

## Attachment B – Proposed Middle Mile Service Offerings

Please complete the table below describing the service offerings that will be available indicating the bandwidth packages, the distance band (length of the network section) or point-to-point (geographical end points) of the specific package, the minimum peak load bandwidth that is available on the route, and the monthly or yearly pricing for the services. The chart may be adapted to adequately describe the service offerings of the project as long as the information described is included. If different packages will be available based on the area that will be receiving the benefits, then separate charts should be developed indicating which are the services for each area.

Service Offering	Distance Band or Point to Point	Minimum Peak Load Network Bandwidth Capacity (Mbps)	Monthly/Yearly Pricing (\$)	Other
DS-3	Point to Point – 3 Year	44.736	\$1,800.00	Pricing on 3 year term
DS-3	Route Protected – 3 Year	44.736	\$2,250.00	Pricing on 3 year term
OC-3	Point to Point – 3 Year	155	\$4,000.00	Pricing on 3 year term
OC-3	Route Protected – 3 Year	155	\$5,000.00	Pricing on 3 year term
OC-12	Point to Point – 3 Year	612	\$8,000.00	Pricing on 3 year term
OC-12	Route Protected – 3 Year	612	\$10,000.00	Pricing on 3 year term
OC-48	Point to Point – 3 Year	2448	\$16,000.00	Pricing on 3 year term
OC-48	Route Protected – 3 Year	2448	\$20,000.00	Pricing on 3 year term
2.5G WAVE	Point to Point – 3 Year	2448	\$12,500.00	Pricing on 3 year term
100Mbps FE	Point to Point – 3 Year	100	\$2,400.00	Pricing on 3 year term
100Mbps FE	Route Protected – 3 Year	100	\$3,000.00	Pricing on 3 year term
GigE	Point to Point – 3 Year	1000	\$8,500.00	Pricing on 3 year term
GigE	Route Protected – 3 Year	1000	\$10,625.00	Pricing on 3 year term

## **ION – Affordable Broadband Connections to Rural Communities**

ION's application is for a 10-segment "middle-mile" project, so only the Competitor Table for the Middle-Mile component of Attachment C is being submitted for review.

Due to the size and geographic territory ION's application covers, which is primarily the rural areas of upstate New York and parts of Pennsylvania and Vermont, Verizon is the only true competitive service provider in the areas ION is intending to bring its high speed fiber backbone. While there may be another service provider in a town or general area where the ION network will have a connection point, it is usually a local provider with little or no broadband access, or broadband access at an extremely high cost via Verizon. So there are no other true middle mile providers in these areas.

Comparing the Verizon pricing below to the ION pricing in Attachment B, it is quite evident that ION's fiber network brings affordable broadband access to the rural areas it connects to. In direct comparison, the ION price is less than the half the Verizon price for the same bandwidth connection, or can provide 3-4 times the amount of bandwidth for the same price. In many areas, the higher bandwidth circuits are simply not available through Verizon or any provider, as they are unable to offer or provide the service. (**Note:** in many regions the price for services is much higher, if service is available at all.)

**ATTACHMENT C – COMPETITOR TABLE – MIDDLE MILE**

**Existing Middle Mile Broadband Service Providers and Services Offered:** Please complete a table describing the competing middle mile providers’ broadband service offerings being advertised in the last mile service areas associated with the proposed middle mile project. **For BIP**, please provide this information for each census designated community within each last mile service area. For each competitor, explain the following: a) technology; b) service tiers; c) point-to-point of the competitor’s service offering; d) speed; and e) pricing. Include any other comments to explain your findings if necessary.

ION HoldCo, LLC							
Service Area	Middle Mile Services Provider	Technology Platform	Service Tier	Point-to-Point	Minimum Peak Load Network Bandwidth Capacity	Pricing	Other Comments
Service Area 1/ Census community 1	Provider A – Verizon		DS-3	Wire center to wire center	44.736 Mbps	\$4855.53	Pricing based on bands/zones, used lowest price band for example. 3 Year term
	Provider B						
Service Area 2/ Census community 2	Provider A - Verizon		DS-3	Wire center to wire center	44.736 Mbps	\$5874.41	Pricing based on bands/zones, used highest price for example. 3 Year term
	Provider B						

## Question 26 – Cost Per Household (BTOP Only)

ION Holdco's (ION) project is a BTOP middle mile backbone fiber project, encompassing 1550 route miles of constructed and leased fiber, with 1308 miles being new construction in the rural areas of upstate New York, northeastern Pennsylvania, and western Vermont.

The project will cost approximately \$46 million to complete and will provide affordable, high availability broadband access to an additional 70+ towns and villages in rural upstate New York, northeastern Pennsylvania, and western Vermont. The project also proposes well over 100 direct connections to governmental, educational, and community organizations throughout the state of New York.

ION's intent is to create as many Points of Presence (POP) locations as possible in the rural communities. ION specifically designed its routes to provide access to as many communities and locations as possible, and will continue to examine other possible connection points.

Cost per Household: approx. \$46M divided by 237,364 = **\$194 per Household**

Cost per Person: approx. \$46M divided by 574,765 = **\$80 per Person**

Cost per Business: approx. \$46M divided by 39,502 = **\$1,164 per Business**

Household, Population, and Business data was obtained using the census data on the Fact Finder section of the [www.census.gov](http://www.census.gov) website. Data from each village or town the proposed ION project has an interconnection point or Point of Presence was used for the purposes of this calculation.

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## **Question 27 – Affordability**

ION's project will enable provisioning of affordable broadband services in the un- and underserved areas to which the network will reach by making available high-capacity transport services at reasonable prices.

In many of the areas covered in ION's application, there currently is no true middle mile backbone infrastructure in place. The incumbent LEC may not be able to provide DS1 or DS3 point-to-point connections, and these services are usually expensive when available. If a cable company is present in the market, their normal practice is to not sell middle mile services to service providers as that would introduce competition into the marketplace. (For price comparisons, when the ILEC has services available, please see Attachments B and C.) As a result, there is currently no commercially viable option for last mile broadband providers, thus they are unable to offer services to end-users in these communities.

The pricing ION will offer to last mile service providers in these newly constructed areas will be consistent with its network pricing being offered and provided in its current markets. ION currently provides a similar array of broadband services across its 2000+ mile network, and has working relationships and agreements with many of the last mile service providers that will utilize ION's expanded service area to provide coverage to the most rural residents.

For the few areas that may have a middle mile competitor, ION has consistently proven they match or have lower pricing than other providers.

An additional benefit of using the ION network is the scope and scale of the entire network, which provides the last mile service provider and their customers with multiple options, and the ability to get to anywhere in the state, as well as anywhere in the world. ION's current network reaches into rural areas of the state, as well as the more densely populated regions, and with their POP location in New York City, customers can connect to over 190 carriers providing services worldwide.

**Question #27: Affordability Proof**

The majority of the areas identified in ION’s middle mile application are Verizon service territories, with little to no middle mile infrastructure or competition.

For the areas that Verizon can actually provide point to point circuits, the pricing is primarily from tariff rates (FCC #11) and shown below. As illustrated in the tables below, the ION pricing provides the customers within the identified areas with a significantly more affordable middle mile option.

**Pricing Comparison Spreadsheet**

Verizon Tarriff Pricing						
Circuit Size	Zone/Band	Mileage	Monthly	2 Year Pricing	3 year Pricing	5 Year Pricing
DS-3	1	5	\$ 5,560.15	\$ 5,282.14	\$ 5,004.14	\$ 3,614.10
DS-3	1	25	\$ 7,785.96	\$ 7,396.66	\$ 7,007.36	\$ 5,060.87
DS-3	1	75	\$ 14,784.75	\$ 14,045.51	\$ 13,306.28	\$ 9,610.09
DS-3	2	5	\$ 5,770.15	\$ 5,481.64	\$ 5,193.14	\$ 3,750.60
DS-3	2	25	\$ 8,405.75	\$ 7,985.46	\$ 7,565.18	\$ 5,463.74
DS-3	2	75	\$ 14,994.75	\$ 14,245.01	\$ 13,495.28	\$ 9,746.59
DS-3	3	5	\$ 5,980.15	\$ 5,681.14	\$ 5,382.14	\$ 3,887.10
DS-3	3	25	\$ 8,615.75	\$ 8,184.96	\$ 7,754.18	\$ 5,600.24
DS-3	3	75	\$ 15,204.75	\$ 14,444.51	\$ 13,684.28	\$ 9,883.09
DS-3	4	5	\$ 6,220.15	\$ 5,909.14	\$ 5,598.14	\$ 4,043.10
DS-3	4	25	\$ 9,320.75	\$ 8,854.71	\$ 8,388.68	\$ 6,058.49
DS-3	4	75	\$ 17,072.25	\$ 16,218.64	\$ 15,365.03	\$ 11,096.96
DS-3	5	5	\$ 6,451.15	\$ 6,128.59	\$ 5,806.04	\$ 4,193.25
DS-3	5	25	\$ 9,551.75	\$ 9,074.16	\$ 8,596.58	\$ 6,208.64
DS-3	5	75	\$ 17,303.25	\$ 16,438.09	\$ 15,572.93	\$ 11,247.11
DS-3	6	5	\$ 6,682.15	\$ 6,348.04	\$ 6,013.94	\$ 4,343.40
DS-3	6	25	\$ 9,782.75	\$ 9,293.61	\$ 8,804.48	\$ 6,358.79
DS-3	6	75	\$ 17,534.25	\$ 16,657.54	\$ 15,780.83	\$ 11,397.26

ION Pricing						
Circuit Size	Linear/Route Protected	Mileage	Monthly	2 Year Pricing	3 year Pricing	5 Year Pricing
DS-3	Linear	N/A	\$ 2,250.00	\$ 1,950.00	\$ 1,800.00	\$ 1,650.00
DS-3	Route Protected	N/A	\$ 2,850.00	\$ 2,450.00	\$ 2,250.00	\$ 2,050.00

14 Pages

Withheld in their entirety  
pursuant to FOIA Exemption 4  
(5 U.S.C. § 552 (b)(4))

Network Design and Implementation Plan Certification (to be complete for projects requesting more than \$1 million in federal assistance)

U.S. Department of Agriculture and U.S. Department of Commerce  
BIP and BTOP Program

We the undersigned, certify that the proposed broadband system will work as described in the System Design and Network Diagram sections, and can deliver the proposed services outlined in the Service Offerings Section. Moreover, the system, as designed, can meet the proposed build-out timeframe based on the resources designated in Project Viability Section, and will be substantially complete in two years, and complete within three years.

8-12-09

(Date)

Joseph Calzane  
(Authorized Representative's Signature)

Joseph Calzane  
Name:  
Vice President

Title:

8-12-09

(Date)

Wade A Ziegeldorf  
(Certifying Engineer's Signature)

Wade A Ziegeldorf  
Name:

Engineering Staff Manager  
Title:



**ATTACHMENT E – PROJECT PLAN (KEY PHASES AND MILESTONES TO DEMONSTRATE DEGREE OF COMPLETION)**

- Use the following table to list the major network build-out phases and milestones that can demonstrate that your entire project will be substantially complete by the end of Year 2 and fully complete by the end of Year 3. This is to be done at the aggregate level (combining all proposed funded service areas.)
- Indicate how the milestones listed below will demonstrate these completion objectives. The applicant should consider such project areas as: a) network design; b) securing all relevant licenses and agreements; c) site preparation; d) equipment procurement; e) inside plant deployment; f) outside plant deployment; g) equipment deployment; h) network testing; i) network complete and operational. The applicant may provide any other milestones that it believes showcase progress.
- Project inception (Year 0) starts at the date when the applicant receives notice that the project has been approved for funding.
- In the table, provide any information (e.g., facts, analysis) to: a) demonstrate the reasonableness of these milestones; b) substantiate the ability to reach the milestones by the quarters indicated.
- On a separate sheet, describe the key challenges, if any, to a timely completion of the project, including any applicable mitigation plans.

Time Period	Quarter	List All Relevant Milestones	Support for Reasonableness/Data Points
Year 0	-	<p>Detailed Preliminary Design Completed</p> <p>Fiber Routing started for all routes</p> <p>Site Selection Options Determined as needed</p> <p>Fiber lease and collocation agreements started</p> <p>Complete Preliminary Bills of Material for DWDM Equipment</p> <p>Complete Preliminary Bills of Material for SONET Transport Equipment</p>	<p>Preliminary Site Selections and Zoning Requirements will be needed to complete Optical Budget on each route segment</p> <p>Detailed Design will still be subject to Optical Budget change</p>
Year 1	Qtr. 1	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p>	<p>A Certificate of Public Convenience and Necessity (CPCN) is required before construction can be completed.</p> <p>Pole Attachment agreements will affect fiber routes and staking as well as collocation agreements and fiber lease agreements where needed.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>

	Qtr. 2	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p>	<p>Permitting and right of way can be more difficult depending on the roadways.</p> <p>Bidding the construction projects will provide the best cost, however costs could be higher due to construction volume at the time of bidding.</p> <p>Vendor lead times are estimated at 6 weeks for optical equipment requiring accounting for the lead time.</p> <p>Leased fiber must be tested to verify that it meets the specifications for DWDM service.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 3	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p>	<p>Fiber construction could be impacted by weather and construction volume during the construction period.</p> <p>All fiber and equipment to be in place to prepare for final testing and equipment configuration.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 4	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p>	<p>New Fiber and complete fiber routes tested for proper construction and slicing</p> <p>Equipment turned up and configured to prepare for service turn-up.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>

Year 2	Qtr. 1	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's,</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's,</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's,</p>	<p>A Certificate of Public Convenience and Necessity (CPCN) is required before construction can be completed.</p> <p>Pole Attachment agreements will affect fiber routes and staking as well as collocation agreements and fiber lease agreements where needed.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 2	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p>	<p>Permitting and right of way can be more difficult depending on the roadways.</p> <p>Bidding the construction projects will provide the best cost, however costs could be higher due to construction volume at the time of bidding.</p> <p>Vendor lead times are estimated at 6 weeks for optical equipment requiring accounting for the lead time.</p> <p>Leased fiber must be tested to verify that it meets the specifications for DWDM service.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>

	Qtr. 3	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p>	<p>Fiber construction could be impacted by weather and construction volume during the construction period.</p> <p>All fiber and equipment to be in place to prepare for final testing and equipment configuration.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 4	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p>	<p>New Fiber and complete fiber routes tested for proper construction and slicing</p> <p>Equipment turned up and configured to prepare for service turn-up.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 1	1-9-Continue Turning up subscribers and customers on all links.	
	Qtr. 2	•	

Year 3	Qtr. 3	•	
	Qtr. 4	•	

## **ATTACHMENT E – KEY CHALLENGES**

The following are the potential challenges to completing the project according to the projected timeline:

- Weather and Plant Conditions
  - A majority of these projects are OSP construction and have to be completed as conditions permit. If delays are experienced, additional crews and resources may be assigned to the project. Certain tasks are required to be completed in sequential order. This and additional resources could cause schedule slippage.
- Lack of Availability of Materials and Equipment
  - Material Lead-times and prices fluctuate with demand. There is a concern with the magnitude of projects potentially starting at the same time due to the ARRA program. Domestic sources of materials and equipment could become scarce. Timely material procurement and alternate sourcing may help mitigate this problem.
- Timely Release of Funds
  - Timely release of funds is required to maintain financial commitments to suppliers and to keep the required material and resources flowing.
- Certificate of Public Convenience and Necessity (CPCN)
  - A CPCN is required to proceed with construction in some areas. These requirements have been accounted for, but in some cases can be delayed due to unforeseen circumstances. Timely gathering of CPCN's should help mitigate this problem.
- Pole Attachments
  - Pole Attachment agreements have been discussed with the organizations along the planned route, and time has been allocated to secure pole attachment agreements. However, some organizations may not provide signed agreements in a timely fashion, which could cause schedule slippage. Timely negotiations, or in some cases a new route could help mitigate this problem.
- Project Permitting
  - Some jurisdictions may not provide timely permits for the project construction areas. Timely permit filings and in some cases different routes could help mitigate this problem.
- Make Ready
  - The amount of make ready on all of the routes is not known. If additional make ready is required, additional project slippage could occur. Timely staking and preparation for the project upon approval could help mitigate this problem.

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**ATTACHMENT E (CONTINUED) – BUILD-OUT TIMELINE**

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Complete the following schedule for each proposed funded service area ( or, if a middle mile project, for each last mile service area) to indicate the planned build-out in terms of: 1) the requested infrastructure funds; and 2) the entities passed. Entities passed include households, businesses, and "strategic institutions" comprised of critical community facilities, community anchor institutions, and public safety entities. In addition, please complete a separate schedule that aggregates all projected broadband subscribers within the proposed funded service area (or if a middle mile project, for each last mile service area). For BIP only, please include this information for the non-funded service areas as well.

(See Spreadsheet)

**ATTACHMENT E – PROJECT PLAN (KEY PHASES AND MILESTONES TO DEMONSTRATE DEGREE OF COMPLETION)**

- Use the following table to list the major network build-out phases and milestones that can demonstrate that your entire project will be substantially complete by the end of Year 2 and fully complete by the end of Year 3. This is to be done at the aggregate level (combining all proposed funded service areas.)
- Indicate how the milestones listed below will demonstrate these completion objectives. The applicant should consider such project areas as: a) network design; b) securing all relevant licenses and agreements; c) site preparation; d) equipment procurement; e) inside plant deployment; f) outside plant deployment; g) equipment deployment; h) network testing; i) network complete and operational. The applicant may provide any other milestones that it believes showcase progress.
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Time Period	Quarter	List All Relevant Milestones	Support for Reasonableness/Data Points
Year 0	-	<p>Detailed Preliminary Design Completed</p> <p>Fiber Routing started for all routes</p> <p>Site Selection Options Determined as needed</p> <p>Fiber lease and collocation agreements started</p> <p>Complete Preliminary Bills of Material for DWDM Equipment</p> <p>Complete Preliminary Bills of Material for SONET Transport Equipment</p>	<p>Preliminary Site Selections and Zoning Requirements will be needed to complete Optical Budget on each route segment</p> <p>Detailed Design will still be subject to Optical Budget change</p>
Year 1	Qtr. 1	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p>	<p>Pole Attachment agreements will affect fiber routes and staking as well as collocation agreements and fiber lease agreements where needed.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>

	Qtr. 2	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p>	<p>Permitting and right of way can be more difficult depending on the roadways.</p> <p>Bidding the construction projects will provide the best cost, however costs could be higher due to construction volume at the time of bidding.</p> <p>Vendor lead times are estimated at 6 weeks for optical equipment requiring accounting for the lead time.</p> <p>Leased fiber must be tested to verify that it meets the specifications for DWDM service.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 3	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p>	<p>Fiber construction could be impacted by weather and construction volume during the construction period.</p> <p>All fiber and equipment to be in place to prepare for final testing and equipment configuration.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 4	<p>2-Almond, Dansville, Hammondsport, Bath, Addison, Hornell Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>4-Crown Point, Bristol, VT, Burlington, VT, Whitehall, Rutland, VT Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>5-Whitesboro, Utica, Herkimer, Vernon Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>7-Hancock, Forest City, South Canaan, Rowland, Port Jervis, Monroe Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p>	<p>New Fiber and complete fiber routes tested for proper construction and slicing</p> <p>Equipment turned up and configured to prepare for service turn-up.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>

Year 2	Qtr. 1	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's,</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's,</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's, complete collocation agreements, negotiate and complete fiber lease agreements</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Complete fiber routing, acquire CPCN, begin staking, acquire pole attachment agreements, finalize equipment BOM's,</p>	<p>Pole Attachment agreements will affect fiber routes and staking as well as collocation agreements and fiber lease agreements where needed.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 2	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites, test leased fiber for DWDM specifications.</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Complete staking, complete permitting, and acquire right of way, bid/negotiate project for construction, order equipment for sites</p>	<p>Permitting and right of way can be more difficult depending on the roadways.</p> <p>Bidding the construction projects will provide the best cost, however costs could be higher due to construction volume at the time of bidding.</p> <p>Vendor lead times are estimated at 6 weeks for optical equipment requiring accounting for the lead time.</p> <p>Leased fiber must be tested to verify that it meets the specifications for DWDM service.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>

	Qtr. 3	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Construct fiber routes, manage construction, complete fiber splicing, install equipment to prepare for turn-up</p>	<p>Fiber construction could be impacted by weather and construction volume during the construction period.</p> <p>All fiber and equipment to be in place to prepare for final testing and equipment configuration.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 4	<p>1- Jamestown, Randolph, Salamanca, Olean, Cuba, Wellsville, Whitesville Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>3-Addison, Painted Post, Corning, Elmira, Erin, Odessa Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>6-Booneville, Alder Creek, Newport, Marcy, Rome, Utica Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>8 -Massena, Hogansburg, Malone, Chateaugay, Plattsburg Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>9-Dryden, Cortland, Morrisville, Vernon, Oneonta, Cooperstown, Cobleskill Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p> <p>10-Star Lake, Tupper Lake, Paul Smiths, Lake Placid, Elizabethtown, Westport Test newly constructed fiber and complete fiber routes for DWDM specifications, and turn-up equipment</p>	<p>New Fiber and complete fiber routes tested for proper construction and slicing</p> <p>Equipment turned up and configured to prepare for service turn-up.</p> <p>Timeline and projected costs are based on previous projects that have been completed in the area by the applicant, taking into account the additional workload and rise in costs anticipated for stimulus projects.</p>
	Qtr. 1	1-9-Continue Turning up subscribers and customers on all links.	
	Qtr. 2	•	

Year 3	Qtr. 3	•	
	Qtr. 4	•	

## **ATTACHMENT E – KEY CHALLENGES**

The following are the potential challenges to completing the project according to the projected timeline:

- Weather and Plant Conditions
  - A majority of these projects are OSP construction and have to be completed as conditions permit. If delays are experienced, additional crews and resources may be assigned to the project. Certain tasks are required to be completed in sequential order. This and additional resources could cause schedule slippage.
- Lack of Availability of Materials and Equipment
  - Material Lead-times and prices fluctuate with demand. While there is a concern with the magnitude of projects potentially starting at the same time due to the ARRA program, ION has secured reasonable lead times with its major equipment manufacturers. Additionally, ION has established pricing levels with its major equipment manufacturers, so price fluctuation issues should have minimal impact.
- Timely Release of Funds
  - Timely release of funds is required to maintain financial commitments to suppliers and to keep the required material and resources flowing.
- Pole Attachments
  - Pole Attachment agreements have been discussed with the organizations along the planned route, and time has been allocated to secure pole attachment agreements. ION has established agreements with the majority of the pole owners associated with this project. NYS Public Service Commission law has a set schedule for pole attachment process and pricing, so pole attachment issues should be minimal. Timely negotiations, or in some cases a new route if there is an issue could help mitigate this problem.
- Project Permitting
  - Some jurisdictions may not provide timely permits for the project construction areas. Timely permit filings, which ION has prior experience with, and in some cases different routes could help mitigate this problem.
- Make Ready
  - The actual amount of make ready on all of the routes is not known. If additional make ready is required, additional project slippage could occur, but timely staking and preparation for the project upon approval will mitigate this problem.

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**ATTACHMENT E (CONTINUED) – BUILD-OUT TIMELINE**

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Complete the following schedule for each proposed funded service area ( or, if a middle mile project, for each last mile service area) to indicate the planned build-out in terms of: 1) the requested infrastructure funds; and 2) the entities passed. Entities passed include households, businesses, and "strategic institutions" comprised of critical community facilities, community anchor institutions, and public safety entities. In addition, please complete a separate schedule that aggregates all projected broadband subscribers within the proposed funded service area (or if a middle mile project, for each last mile service area). For BIP only, please include this information for the non-funded service areas as well.

(See Spreadsheet)

64 Pages

Withheld in their entirety  
pursuant to FOIA Exemption 4  
(5 U.S.C. § 552 (b)(4))

# Charles (Chuck) W. Mason

## Professional Experience

### **Independent Optical Network (ION)**

**Albany, NY**

**October 2005 – Present**

ION is a statewide fiber optic bandwidth provider serving 60 rural communities across New York State, offering transport products such as GigE, fast Ethernet, OC-n and waves to CLECs, Telephone Companies, Cable TV Companies and select rural vertical markets such as Education, Healthcare and Financial Industries.

**VP – Network/Engineering**

***October 2005 – Present***

### **Martin Group Engineering**

**Mitchell, SD**

**2002 - 2005**

Martin Group is general telecommunications consulting and engineering firm, providing services to rural and regional telephone companies throughout the United States.

Chuck's experience with the Martin Group includes the design, build and implementation of statewide networks for multiple states, as well as the design, engineering, and implementation of copper and fiber infrastructure enhancement. Chuck was the original engineer in charge of the design and implementation of the ION fiber network.

**Regional Engineer Manager**

***2002 - 2005***

### **Connectiv Communications**

**VP – Operations and Engineering**

***1996 – 2002***

### **Tel Data Inc.**

**Director/General Manager**

***1993 - 1996***

### **Interwest Telecom Services**

**Senior Manager of Operations**

***1990 – 1993***

### **Teletek, Inc.**

**Director of Operations/General Manager**

***1988 - 1990***

### **Interwest Telecom Services**

**Director of Operations/General Manager**

***1980 - 1988***

### **Education:**

Devry Institute of Technology – AS Electrical Engineering

**1971 - 1973**

Metropolitan State College – BS Electrical Engineering

**1977 – 1980**

Manufacturers Certifications - Various

# Joseph (Joe) Calzone

## Professional Experience

### **Independent Optical Network ("ION") Albany, NY**

ION is a statewide fiber optic bandwidth provider serving 60 rural communities across New York State, offering transport products such as GigE, fast Ethernet, OC-n and waves to CLECs, Telephone Companies, Cable TV Companies and select rural vertical markets such as Education, Healthcare and Financial Industries.

**Vice President – Operations**

*October 2004 – Present*

### **One Communications – previously Choice One Communications Rochester, NY**

One Communications is a \$800+ million Telecommunications Service Provider with 2000 employees serving clients via an IP core network provisioned onto 11,000 route miles of fiber.

**Vice President of Wholesale Sales & Marketing**

*December 2003 – September 2004*

**Vice President of Engineering**

*August 2000 – December 2003*

**Vice President of Network Engineering**

*June 1998 – July 2000*

### **Frontier Communications f/n/a Citizens Communications Various Locations**

Frontier is a \$2 Billion rural local exchange carrier, supporting 3,000,000 access lines across 24 states with nearly 6,000 employees.

**Vice President - National Sales and Service, Stamford, CT**

*February 1997 – May 1998*

**Vice President - Carrier Services, Rochester, NY**

*November 1996 – January 1997*

**VP - Long Distance Eng & Ops, Dallas TX & Johnstown NY**

*February – October 1996*

**Regional VP - Network Access Sales, Rochester NY**

*October 1995 – January 1996*

**Director of Carrier Services Western Region, Santa Barbara, CA**

*June – September 1995*

**Manager of Business Development, Rochester, NY**

*1993 -1994*

**Manager of Carrier Marketing, Rochester, NY**

*1992 - 1993*

**Manager Traffic & Switch Engineering, Rochester, NY**

*1991 - 1992*

**Supervisor of Switching and Equipment Engineering**

*1988 –1990*

**Various Engineering Positions**

*1985 -1988*

### **Education/ Affiliations:**

Saint John Fisher College, Graduate School of Management, Rochester, New York  
Degree/Major Studied: Masters of Business Administration

May 1991

State University of New York College of Technology, Utica, New York  
Degree/Major Studied: Bachelor of Science Computer Science, Minor in Electrical Engineering

May 1985

Member of Institute of Electrical and Electronic Engineering Society

1985 - Present

# James (Jim) R. Becker

## Professional Experience

### **Independent Optical Network (ION)**

#### **Albany, New York**

ION is a statewide fiber optic bandwidth provider serving 60 rural communities across New York State, offering transport products such as GigE, fast Ethernet, OC-n and waves to CLECs, Telephone Companies, Cable TV Companies and select rural vertical markets such as Education, Healthcare and Financial Industries.

**CEO – President**

*June 2006 – Present*

### **Independent Network Operations Consortium (INOC)**

#### **Albany, New York**

INOC is a regional datacenter and wholesale ISP provider, providing Internet, Data, and Network Services to its member companies and customers from its Albany Operations Center. Services include direct bandwidth connections to enterprise/retail businesses, virtual ISP and backbone bandwidth services to regional and local ISPs, co-location services, managed and unmanaged hosting services, data storage services, and disaster recovery solutions.

**Chairman of the Board**

*January 2004 - Present*

**President/General Manager**

*January 2000 - Present*

### **The Middleburgh Telephone Company**

#### **Middleburgh, NY**

Middleburgh Telephone (MIDTEL) is a 112 year-old rural local exchange carrier, supporting 340 square miles in Schoharie County, SW of Albany. MIDTEL provides local, long distance, cable television, cellular and Internet/Broadband services to over 10,000 subscribers. Jim is 4<sup>th</sup> generation in the Becker ownership family.

**VP - Director of Strategic Development**

*February 2002 – Present*

**VP - Operations – MTL D**

*October 1998 – June 2006*

**President/General Manager - MIDTEL NET**

*June 1996 – June 2006*

**President/General Manager - MIDTEL CABLE TV**

*October 1994 – June 2006*

**Various Technical and Engineering responsibilities**

*September 1993 – October 1994*

Jim was responsible for the creation and launching of MIDTEL's Cable Television and Internet services, both of which are hugely successful, as well as MIDTEL's long distance company, MTL D.

## **Education/ Affiliations:**

Clarkson University – MS Mechanical Engineering/Minor in Management

May 1992

New York State Telecommunications Association – Board Member

Current

## **ION Management Team Overview**

ION's management team, consisting of Jim Becker - CEO/President, Joe Calzone – VP of Operations, and Chuck Mason – VP of Network & Engineering is a well-seasoned team with a vast array of telecom experiences ranging across all facets of business. The team has extensive experience building businesses and networks from the ground up, and has had success doing so throughout their careers.

Joe Calzone was ION's first employee and was largely responsible for overseeing the design, implementation, and turn-up of the ION network, as well as the creation of the business. Joe oversaw all facets of the organization while also negotiating fiber lease deals, overseeing the network build out, and corresponding with the board of managers.

Joe's varied telecom experience ranges over 20+ years, and includes sales, marketing, engineering, and operations. Joe gathered his experiences working for Frontier Communications, Citizens Communications, and was one of the first 10 employees at Choice One Communications when the company launched.

Chuck Mason was the lead project manager on the ION network design, build, and turn-up, while working for Martin Group Engineering. In 2005, ION was able to hire Chuck as its VP of Network and Engineering.

Chuck is a 38-year telecom veteran. While at Connectiv, a carrier's carrier network, Chuck managed the middle-mile network and supervised 150 people and thousands of miles of network. While at the Martin Group, Chuck managed the design and construction of other statewide networks prior to the ION project. Chuck brings a wealth of knowledge and experience building and operating networks.

Jim Becker was hired in June 2006 as the CEO/President to help with an equity raise and to steer the ION organization from a strategic and investor level. Jim's experience includes building new networks, back-office operations, operations management, strategic development, and includes multiple successful start-ups.

Jim is part of the ownership family (4<sup>th</sup> generation) of the 112 year-old Middleburgh Telephone Company (MIDTEL), and has 16 years of telecommunications experience. Jim was the creator of MIDTEL's highly successful Cable Television, ISP, and Long Distance companies. Jim is also the founder and President of INOC, a datacenter and wholesale ISP business, located in downtown Albany which has been successfully providing services since 2001. Jim serves on various industry and non-industry board of directors, including the New York State Telecommunications Association.

As you can see above, ION has solid stewardship within the organization with this excellent team of professionals. ION also benefits from the guidance of its 12 Telco owner companies who collectively have over 1200 years of telecommunications operating experience, and from Sovernet Communications' competitive marketplace success.

## **DANC PROJECT MANAGEMENT TEAM**

The Development Authority of the North Country's (DANC) staff participants have extensive experience in design, implementation and supporting carrier class networks. The team is highly trained with vast experience in the communication industry and has a reputation of excellent service and being "easy to work with" (see bios).

Having experience in integrating networks of this magnitude, DANC fully understands the level of project management that is required to successfully implement a project of this scale. In order to ensure that this implementation is successful, we have assembled a project team with expertise in building carrier class networks. DANC will provide a team of experienced engineers and management professionals who possess the required level of expertise and complementary skill-sets necessary to achieve project success.

The dedicated Project Team from DANC will include the following personnel:

David Wolf	General Manager, DANC
Dorlene MacDiarmid	Telecommunications Business Dvlpmt. Rep., DANC
Robert Durantini	Télécommunications Services Manager, DANC
Steve Smithers	Network Engineer, DANC
Mark Borte	Transmission Engineer, DANC
Tim Field	Transmission Engineer, DANC

The DANC Project Team consists of multiple senior level engineers that possess both the project management and technical skills and experience to ensure that this project meets its defined objectives.

### **David Wolf - General Manager**

David Wolf is the General Manager for the Open Access Telecom Network Division of the Development Authority of the North Country (DANC). Mr. Wolf has more than 25 years of telecom network experience in a variety of executive management and engineering roles. Prior to joining DANC, Mr. Wolf was Chief Operating Officer for Patient Portal Connect, Inc./TMS a leading provider of patient communications management services. Mr. Wolf joined Patient Portal/TMS in 2001. In his roles as COO and vice president of corporate development, Mr. Wolf was responsible for developing the business strategy, network plan, network design, technology selection, procurement, implementation and on-going support for a variety of customers. Prior to joining Patient Portal/TMS, Mr. Wolf was Chief Technology Officer at Telergy, a provider of business telecommunications and diverse optical network solutions, from late 1997 to November 2001. At Telergy, he was responsible for designing, implementing and operating all network services, data storage facilities and high speed data platforms. Prior to joining Telergy, Mr. Wolf spent 14 years with Verizon in a variety of engineering and management roles. Mr. Wolf received his Bachelors of Technology degree in chemical engineering from the University of Dayton in 1983, and graduated with honors from Chapman Universities MBA program in 1996. Mr. Wolf is also an adjunct professor at Syracuse University and a member of the board of directors of the Empire Federal Credit Union.

### **Dorlene MacDiarmid – Telecommunications Business Development Rep.**

Dorlene S. MacDiarmid, Telecommunications Business Development Representative, is responsible for a variety of activities supporting the development and operations of the Open Access Telecommunications Network (OATN). She uses her marketing, contract negotiation, customer service, and management experience from the 35 years experience in the telecommunications industry to support the OATN. She contributes outstanding knowledge of pricing, tariffs, inter-carrier business practices and regulatory requirements. Mrs. MacDiarmid's career in the telecommunications industry includes sales and management positions at Dominion Telecom, Telergy Network Services, Northland Communications, and NYNEX. Mrs. MacDiarmid has an AAS in Journalism from Morrisville State College which she has supplemented by numerous Bell System and Bell Core courses related to the telecommunications industry.

Dorlene will play a critical role in contract negotiation, customer care and act as the primary customer interface after the completion of the network.

### **Robert Durantini – Telecommunications Services Manager**

Robert J. Durantini is Telecommunications Services Manager for the Development Authority of the North Country. He holds an Associate of Science degree from SUNY Empire State College in computers and electronics as well as a Bachelor of Science degree in telecommunications from SUNY ESC. Mr. Durantini has over 20 years of telecommunications engineering, project management and supervisory experience with Verizon and Telergy as well as 11 years in the United States Air Force working in the avionics/electronics field. Mr. Durantini has been employed at the Development Authority since 2003, and was primary project engineer/ manager for planning and directing the design, development and implementation of all network systems of the Open Access Telecommunications Network.

Bob will be responsible for all Outside Plant Engineering and will oversee the construction of all outside plant facilities that are required to implement this network. His experience in Outside Plant Engineering and Construction Management as well as experience interfacing with other utilities will be critical to the timely completion of this network.

### **Stephen Smithers – Network Engineer**

Stephen F. Smithers joined the Development Authority of the North Country in 2005, and is the Network Engineer of its Open Access Telecommunications Network (OATN). Mr. Smithers has over 20 years in the Networking field and has attained numerous industry certifications. He holds multiple certifications from Cisco (CCIE, CCNP & CCNA) and has held Microsoft, Nortel and Novell certifications as well. Mr. Smithers' career in the Networking field includes positions held with Telergy, Nynex Business Centers and local computer resellers. His experience with Local Area Networks (LANs) and Wide Area Networks (WANs) provides our OATN customers with friendly and extremely knowledgeable customer support. Steve is organized has exceptional follow-through abilities.

He is able to plan and oversee projects from conception to successful conclusions. Currently he is responsible for the Design, Implementation, Installation and Monitoring of DANC's Data Network. Steve has an extensive background in key elements of this project which include Ethernet, 802.1Q VLAN's, QOS/COS, Firewalls and Routing.

Steve will play a critical role in the deployment of this application. Leveraging his extensive experience in deploying similar private networks, he will lead the design, procurement and implementation of that data network that will deliver services. Upon project completion, Steve will serve as the primary point of contact for all technical related matters.

### **Mark Borte – Transmission Engineer**

Mark Borte is responsible for the operation and maintenance of all optical and electrical transmission equipment in the Open Access Telecommunications Network (OATN). His telecommunications career started as a Communications Specialist in the United States Marine Corps where he received extensive telecom training and applied that training in demanding field applications. Subsequently, he went on to receive a Bachelor of Science degree from the SUNY Institute of Technology in Telecommunications and a Masters Degree in Telecommunication from Syracuse University. For the past 13 years, his professional experience has focused on the design, build and operation of advanced optical networks for telecommunications service providers.

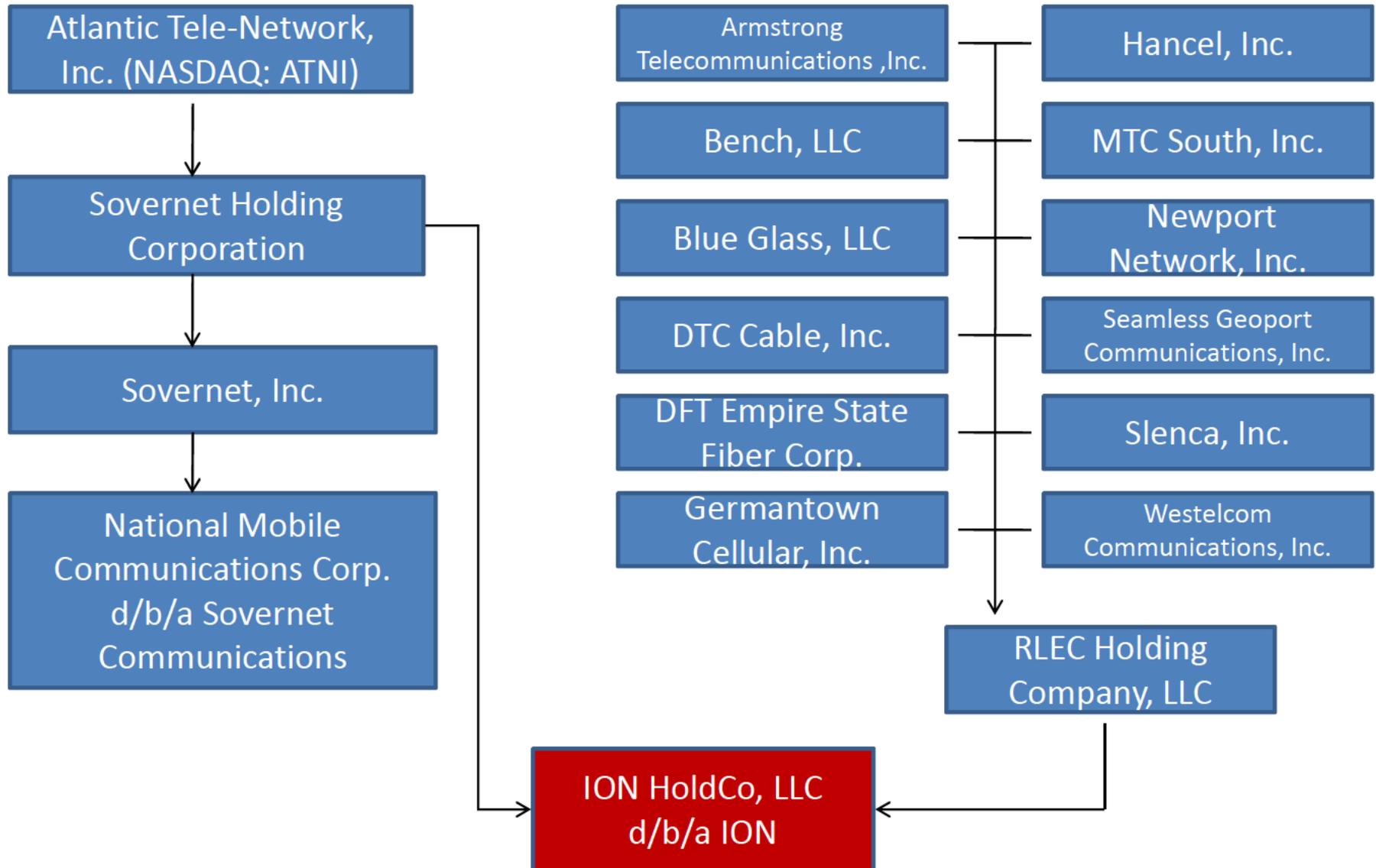
Mark will take responsibility for the field deployment and field support.

### **Tim Field – Transmission Engineer**

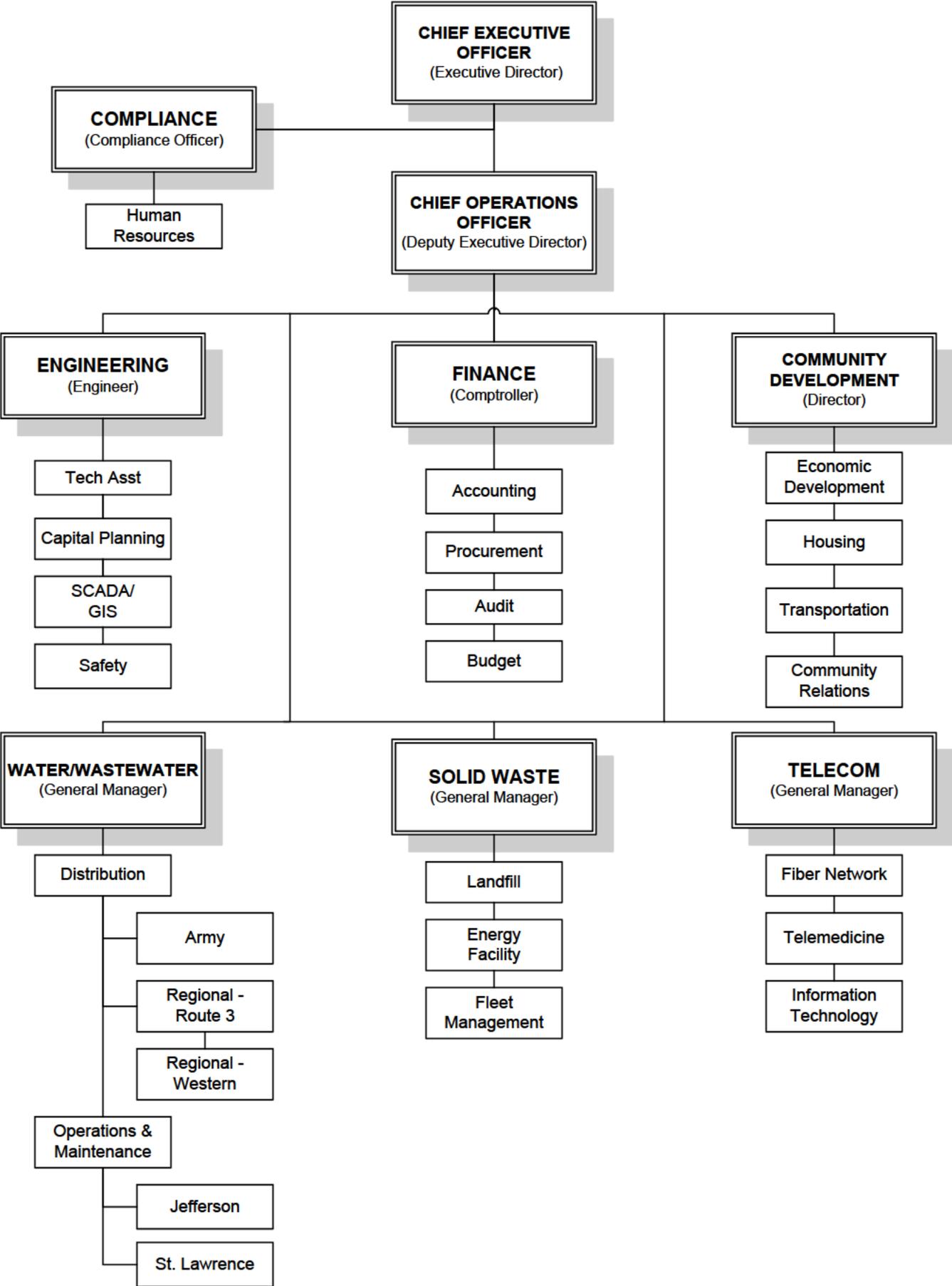
Tim Field joined the Development Authority of the North Country in 2007. Mr. Field was previously with OCM BOCES where he was responsible for a large optical/data network including 20 distance learning sites. His duties include operation and maintenance of all optical and electrical transmission equipment in the Open Access Telecommunications Network (OATN). Mr. Field also provides backup coverage for the Network Engineer. His career includes extensive experience in data communications as well as transmission systems. Mr. Field holds certifications from Cisco, Nortel and CompTIA.

ION ownership, with individual  
RLEC investors listed.

# ION-Related Companies



Development Authority of the North Country  
 Organization Chart – April 2009



# HERZOG LAW FIRM

## Legal Opinion

August 6, 2009

Administrator  
Rural Utilities Service  
U. S. Department of Agriculture Washington,  
D. C. 20250-1500

Assistant Secretary  
National Telecommunications and Information Administration U.S.  
Department of Commerce  
Washington, D.C. 20230

**Re: ION HoldCo, LLC**

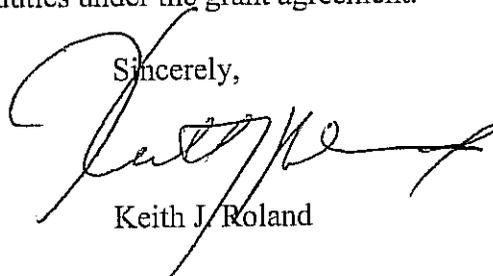
Dear Sir or Madam:

We are special counsel for ION HoldCo, LLC, (the "Applicant"). In such capacity, we acted as counsel to the Applicant in connection with its ability to apply to the Broadband Technology Opportunities Program and in the review of the grant agreement, as referenced in the Notice of Funds Availability.

We are of the opinion that:

- (a) the Applicant is a duly organized and existing limited liability company (LLC) under the laws of the State of New York.
- (b) the Applicant has corporate power: (1) to execute and deliver the grant agreement; and (2) to perform all acts required to be done by it under said agreement.
- (c) no legal proceedings have been instituted or are pending against the Applicant, the outcome of which would adversely affect the Applicant's ability to perform the duties under the grant agreement and there are no judgments against the Applicant which would adversely affect the Applicant's ability to perform the duties under the grant agreement.

Sincerely,



Keith J. Roland

KJR:tlm

Herzog Law Firm P.C.  
7 Southwoods Boulevard  
Albany, NY 12211

V 518 . 465 . 7581  
F 518 . 462 . 2743  
www.herzoglaw.com



## Legal Opinion

August 12, 2009

Administrator  
Rural Utilities Service  
U. S. Department of Agriculture  
Washington, D. C. 20250-1500

Assistant Secretary  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
Washington, D.C. 20230

### **Re: Development Authority of the North Country**

Dear Sir:

We are general counsel for the Development Authority of the North Country (the "Applicant.") In such capacity, we acted as counsel to the Applicant in connection with its ability to apply to the Broadband Initiatives Program and/or the Broadband Technology Opportunities Program and in the review of the Notice of Funds Availability.

We are of the opinion that as of this date:

- (a) the Applicant is a duly organized and existing Public Benefit Corporation under the laws of the State of New York;
- (b) the Applicant has corporate power to enter into an agreement with Rural Utilities Service ("RUS") and/or National Telecommunications and Information Administration ("NTIA") for funding;
- (c) no legal proceedings have been instituted or are pending against the Applicant, the outcome of which would adversely affect the Applicant's ability to enter into an agreement with RUS and/or NTIA for funding, or adversely affect the security to be pledged under any such agreement, and there are no judgments against the Applicant and no liens against any of the personal property of the Applicant, which would adversely affect the security to be pledged under any such agreement; and

Page 2 of 2

(d) The Applicant has the power to own its property and carry out its business as now conducted.

Very truly yours,



JK Hage III

Cc: James W. Wright, Executive Director DANC

## Question 41 – Attachment (Additional Information)

### ION Development Agencies Partners

*Southern Tier West Regional Development and Planning Board* coordinates planning and development activities in Allegany, Cattaraugus, and Chautauqua Counties so as to promote social, physical, and economic development in these counties. See: [www.southerntierwest.org/](http://www.southerntierwest.org/).

*Southern Tier Central Regional Development and Planning Board* provides a variety of services to units of government, agencies, and the private sector in Chemung, Schuyler and Steuben Counties of New York State. See: <http://www.stcplanning.org/>

*Southern Tier East Regional Development and Planning Board's* mission is to partner with member counties to identify and address multi-county issues in order to improve the quality of life within the region. See: <http://www.steny.org/>

*CBN Connect* is intended to be a wholesale "carrier's carrier," providing open services broadband transport throughout the Clinton, Essex and Franklin Tri-County region of New York State. This will not only enable service providers to provide state of the art broadband services in previously unreachable areas, but also in most cases allow the residents to have a choice of service provider. See: [www.cbnconnect.org](http://www.cbnconnect.org). The ION network will provide broadband connectivity out of the proposed CBN services region.

The proposed network within this application, as well as the current ION network will be leveraged to assist these agencies/entities in fulfilling their missions and providing for the residents and businesses in their respective areas. The ION network brings affordable, reliable, high speed broadband connections to these unserved and underserved rural areas, where no other provider has. ION will help support the entities so that they can operate and maintain mission services, while working to attract more last mile service providers and additional businesses to support the local economy. Without ION and the robust network it brings in support, these areas would remain high capacity broadband challenged, and could easily be left behind in the Information Era.

Additionally, ION is working closely with the departments of New York State shown below, in an effort to bring redundant, affordable, high capacity broadband to as many of their specific locations as possible throughout the state.

*New York State Office of Mental Health* -New York State has a large, multi-faceted mental health system that serves more than 500,000 individuals each year. The Office of Mental Health (OMH) operates psychiatric centers across the state, and also regulates, certifies and oversees more than 2,500 programs, which are operated by local governments and nonprofit agencies. These programs include various inpatient and

outpatient programs, emergency, community support, and residential & family care programs.

To complement these various programs, the OMH entities have the ability to apply for premise equipment and health services grants that are available. The specific telemedicine applications of interest to OMH are described in the response to Question 11, but as an overview these grants fall under the Telemedicine category and utilize broadband for tele-psychiatry, tele-counseling, tele-training, electronic medical records, etc.

*New York State Department of Corrections (DOCS)* – The NYS DOCS mission is to enhance public safety by providing appropriate treatment services, in safe and secure facilities, that address the needs of all inmates so they can return to their communities better prepared to lead successful and crime-free lives. As part of its application, ION has lateral network extensions to 14 maximum-security prisons, with DOCS requiring a minimum connection of 1Gbps at each location.

These agencies need high speed and affordable broadband connections to perform their day to day operational duties and improve their ability to provide better, more reliable service to their customers. Both agencies have provided ION with letters of support for this application.

**General Overall Budget For Joint Applications Only:** Please complete the following table only if you are submitting a joint BIP/BTOP Application. Please use the grid on Project Budget Tab in the online system for the BIP budget and then complete the table below for BTOP.

Equipment Category	Grant Request	Equity	Debt	Bonds	Other Funding	Total
Network & Access Equipment (switching, routing, transport, access)	5,077,712	94,377	1,145,191		29,860	6,347,140
Outside Plant (cables, conduits, ducts, poles, towers, repeaters, etc.)	28,947,625	883,564	6,054,859		298,484	36,184,532
Buildings and Land – (new construction, improvements, renovations, lease)	1,596,401		387,950		11,150	1,995,501
Customer Premise Equipment (modems, set-top boxes, inside wiring, etc.)						
Billing and Operational Support Systems (IT systems, software, etc.)						
Operating Equipment (vehicles, office equipment, other)						
Engineering/ Professional Services (engineering design, project management, consulting, etc.)	3,162,876	86,832	673,743		30,144	3,953,595
Testing (network elements, IT system elements, user devices, test generators, lab furnishings, servers/computers, etc.)						
Site Preparation						
Other Grant Admin	940,000		Funded by	Operations	235,000	1,175,000
<b>Total Broadband System</b>	<b>39,724,614</b>	<b>1,064,773</b>	<b>8,261,743</b>		<b>604,638</b>	<b>49,655,768</b>

1 Page

Withheld in its entirety  
pursuant to FOIA Exemption 4  
(5 U.S.C. § 552 (b)(4))

In an effort to streamline the information without being unwieldy, we are providing the following links to both ATN – ION Holdco’s and DANC’s historical financial information.

Please note: ION Holdco’s financial statements are consolidated into Sovernet Communications’ financial information, which as a wholly subsidiary, are consolidated into ATN’s SEC financial statements.

Link for ATN (Atlantic Tele-Network) – ION Holdco financials:

<http://atni.com/financial.php>

Link for DANC (Development Authority of the North Country) financials:

<http://www.danc.org/reports.html>



Business Customers	YEAR 0	YEAR 1				YEAR 2				YEAR 3				YEAR 4				YEAR 5				
		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	
<i>Service Type #1</i>																						
DSL																						
Net add-ons	0	0	0	0	5000	0	10000	0	5000	0	7500	0	0	0	7500	0	0	0	0	5000	0	
Cumulative subscribers	0	0	0	0	5000	5000	15000	15000	20000	20000	27500	27500	27500	27500	40000	40000	40000	40000	40000	45000	45000	
<i>Service Type #2</i>																						
Intergrated DS1																						
Net add-ons	0	0	0	140	420	84	56	84	140	28	56	56	28	28	112	56	28	28	28	28	28	
Cumulative subscribers	0	0	0	140	560	644	700	784	924	952	1008	1064	1092	1120	1232	1288	1316	1344	1372	1400	1428	
<i>Service Type #3</i>																						
GigE or Fast E																						
Net add-ons	0	0	0	0	6	3	6	6	3	6	3	4	4	3	3	3	2	3	3	2	2	
Cumulative subscribers	0	0	0	0	6	9	15	21	24	30	33	37	41	44	47	50	52	55	58	60	62	

Strategic Institution	YEAR 0	YEAR 1				YEAR 2				YEAR 3				YEAR 4				YEAR 5				
		Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	Qtr. 1	Qtr. 2	Qtr. 3	Qtr. 4	
<i>Service Type #1</i>																						
DSL																						
Net add-ons	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Cumulative subscribers																					0	
<i>Service Type #2</i>																						
Integrated DS1																						
Net add-ons	0	0	0	0	28	56	28	28	28	56	28	56	28	28	56	28	28	28	28	28	0	
Cumulative subscribers	0	0	0	0	28	84	112	140	168	224	252	308	336	364	420	448	476	504	532	560	560	
<i>Service Type #3</i>																						
GigE or FastE																						
Net add-ons	0	0	0	0	23	8	12	28	8	2	4	4	2	2	4	4	2	2	4	4	2	
Cumulative subscribers	0	0	0	0	23	31	43	71	79	81	85	89	91	93	97	101	103	105	109	113	115	

## SUBSCRIBER PROJECTION TABLE AND RATE PLANS VOICE SERVICES

**COMPLETE THE CHART BELOW FOR EACH PROPOSED FUNDED SERVICE AREA. FOR ALL OTHER SERVICE AREAS, PLEASE PREPARE A CHART THAT AGGREGATES THIS INFORMATION**

*\* Not Applicable \**

SERVICE AREA NAME: ION Middle Mile - Not Applicable

	Census Community	Year 1		Year 2		Year 3		Year 4		Year 5	
		Res	Bus								
1	NA										
2	NA										
3	NA										
4											
5											
6											
7											
8											
9											
10											
TOTAL											

Rates: NA  
 Residential Service NA  
 Business Service NA  
 Other (Specify): NA

NA

Note: Complete a separate table for each service area.

**VIDEO SERVICES**

**SUBSCRIBER PROJECTS AND RATE PLANS**

**COMPLETE THE CHART BELOW FOR EACH PROPOSED FUNDED SERVICE AREA. FOR ALL OTHER SERVICE AREAS, PLEASE PREPARE A CHART THAT AGGREGATES THIS INFORMATION**

SERVICE AREA NAME: ION Middle Mile - Not Applicable

*\* Not Applicable \**

	Census Community	Year 1			Year 2			Year 3			Year 4			Year 5		
		Pkg 1	Pkg 2	Other												
1	NA															
2	NA															
3	NA															
4																
5																
6																
7																
8																
9																
10																
TOTAL																

Rates: NA  
 Package 1: (ex. 150 basic channels / \$35) NA  
 Package 1: (ex. 150 basic channels and Premium / \$60) NA  
 Other (Specify): NA

*NA*

Note: Complete a separate table for each service area. Column headings should be changed to reflect the name of the service package to be offered. Additional columns may be added for each year if more than three package are offered.

3 Pages

Withheld in their entirety  
pursuant to FOIA Exemption 4  
(5 U.S.C. § 552 (b)(4))

ION Holdco LLC  
Stimulus Funding  
Financial Plan Assumptions

Any ARRA Funding received is netted against the purchase cost of assets. For example, if we purchased an item for \$100,000 and received 80% funding we would record the asset at \$100,000 less the \$80,000 (80%) funding, or \$20,000. Project costs are not depreciated until the project is completed and put into service.

*This policy is consistent with generally accepted accounting principles (GAAP) and therefore appropriate for our business case.*

Depreciable lives:

Fiber Construction                      20 years

Electronics and other                      5 years

*This policy is consistent with industry guidelines; fiber construction is generally long-lived while electronics, subject to technological changes, are generally shorter-lived. Therefore we believe this policy is appropriate for our business case.*

Interest rate on funds borrowed to support the company's contribution to the projects would be borrowed at 4.25% per annum. Borrowings are paid down over the weighted average depreciable lives of the assets purchased.

*Current prime interest rates stand at 3.25%. Using a rate 1% over the prime rate is reasonable and appropriate for our business case.*

Project design and construction management costs are capitalized.

Operating expenses are expensed as incurred; no operating expenses are capitalized or deferred.

*These policies are consistent with ION Holdco LLC accounting policies and with generally accepted accounting principles and therefore appropriate for our business case.*

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Requirements BTOP**

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**U.S. Department of Commerce  
Broadband Technology Opportunities Program**

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(i) I certify that I am authorized to submit this grant application on behalf of the eligible entity(ies) listed on this application, that I have examined this application, that all of the information and responses in this application, including certifications, and forms submitted, all of which are part of this grant application, are material representations of fact and true and correct to the best of my knowledge, that the entity(ies) that is requesting grant funding pursuant to this application and any subgrantees and subcontractors will comply with the terms, conditions, purposes, and federal requirements of the grant program; that no kickbacks were paid to anyone; and that a false, fictitious, or fraudulent statements or claims on this application are grounds for denial or termination of a grant award, and/or possible punishment by a fine or imprisonment as provided in 18 U.S.C. § 1001 and civil violations of the False Claims Act.

(ii) I certify that the entity(ies) I represent have and will comply with all applicable federal, state, and local laws, rules, regulations, ordinances, codes, orders and programmatic rules and requirements relating to the project. I acknowledge that failure to do so may result in rejection or deobligation of the grant or loan award. I acknowledge that failure to comply with all federal and program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

(iii) If requesting BTOP funding, I certify that the entity(ies) I represent has and will comply with all applicable administrative and federal statutory, regulatory, and policy requirements set forth in the DOC Pre-Award Notification, published in the Federal Register on February 11, 2008 (73 FR 7696), as amended; DOC Financial Assistance Standard Terms and Conditions (Mar. 8, 2009); DOC American Recovery and Reinvestment Act Award Terms (April 9, 2009); and any Special Award Terms and Conditions that are included by the Grants Officer in the award."

08-13-2009  
(Date)

  
(Authorized Representative's Signature)

James W. Wright

Name:

Executive Director

Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Requirements BTOP**

**U.S. Department of Commerce  
Broadband Technology Opportunities Program**

(i) I certify that I am authorized to submit this grant application on behalf of the eligible entity(ies) listed on this application, that I have examined this application, that all of the information and responses in this application, including certifications, and forms submitted, all of which are part of this grant application, are material representations of fact and true and correct to the best of my knowledge, that the entity(ies) that is requesting grant funding pursuant to this application and any subgrantees and subcontractors will comply with the terms, conditions, purposes, and federal requirements of the grant program; that no kickbacks were paid to anyone; and that a false, fictitious, or fraudulent statements or claims on this application are grounds for denial or termination of a grant award, and/or possible punishment by a fine or imprisonment as provided in 18 U.S.C. § 1001 and civil violations of the False Claims Act.

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8/04/09

(Date)

Joseph A Calzone  
(Authorized Representative's Signature)

Joseph A CALZONE  
Name:

VP  
Title:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Approval No. 4040-0009

Expiration Date 07/30/2010

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-1 33, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

*SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	*TITLE Executive Director
*APPLICANT ORGANIZATION Development Authority of the North Country	*DATE SUBMITTED 08-13-2009

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Approval No. 4040-0009  
Expiration Date 07/30/2010

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

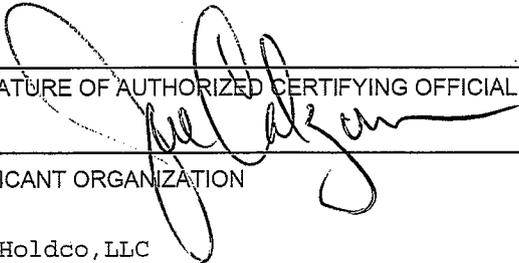
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title, or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-1 33, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

*SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	*TITLE Vice President
*APPLICANT ORGANIZATION ION Holdco, LLC	*DATE SUBMITTED 08-18-2009

### CERTIFICATION REGARDING LOBBYING

Applicants should also review the instructions for certification included in the regulations before completing this form. Signature on this form provides for compliance with certification requirements under 15 CFR Part 28, "New Restrictions on Lobbying." The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Commerce determines to award the covered transaction, grant, or cooperative agreement.

#### LOBBYING

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 15 CFR Part 28, for persons entering into a grant, cooperative agreement or contract over \$100,000 or a loan or loan guarantee over \$150,000 as defined at 15 CFR Part 28, Sections 28.105 and 28.110, the applicant certifies that to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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#### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

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As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above applicable certification.

NAME OF APPLICANT <i>JON Holdco, LLC</i>	AWARD NUMBER AND/OR PROJECT NAME <i>JON Upstate Rural Broadband Initiative</i>
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE <i>Joseph A. Calzone - Vice President</i>	
SIGNATURE <i>Joseph A. Calzone</i>	DATE <i>8/4/09</i>

### CERTIFICATION REGARDING LOBBYING

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NAME OF APPLICANT

Development Authority of the North Country

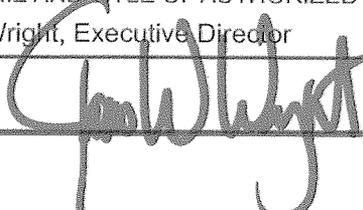
AWARD NUMBER AND/OR PROJECT NAME

Northern New York Open Access Wireless Network

PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

James W. Wright, Executive Director

SIGNATURE



DATE

8/13/2009

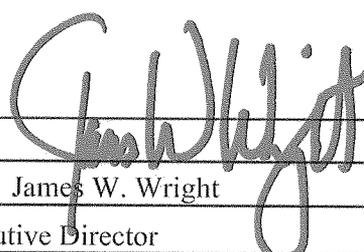
## DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, <i>if known:</i>  Congressional District, <i>if known:</i>	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>   Congressional District, <i>if known:</i>	
<b>6. Federal Department/Agency:</b>	<b>7. Federal Program Name/Description:</b>  CFDA Number, <i>if applicable:</i> _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$ _____	
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):	<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):  <div style="text-align: center; font-size: 2em; font-family: cursive;">  </div>	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less that \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: <u>James W. Wright</u> Title: <u>Executive Director</u> Telephone No.: <u>(315) 785-2593</u> Date: <u>8/13/2009</u>	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

## INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

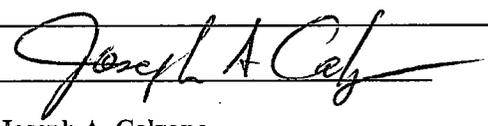
This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.  
  
(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

### Disclosure of Lobbying Activities

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352  
(See reverse for public burden disclosure)

<p><b>1. Type of Federal Action:</b>  a. contract  <u> b </u> b. grant  c. cooperative agreement  d. loan  e. loan guarantee  f. loan insurance</p>	<p><b>2. Status of Federal Action:</b>  a. bid/offer/application  <u> a </u> b. initial award  c. post-award</p>	<p><b>3. Report Type:</b>  a. initial filing  <u> a </u> b. material change</p> <p><b>For material change only:</b>  Year _____ quarter _____  Date of last report _____</p>
<p><b>4. Name and Address of Reporting Entity:</b>  <u> X </u> Prime      _____ Subawardee  Tier _____, if Known:</p> <p><b>ION Holdco, LLC</b>  <b>80 State Street - 7<sup>th</sup> Floor</b>  <b>Albany, NY 12207</b></p> <p>Congressional District, if known: NY 17 - NY 29</p>	<p><b>5. If Reporting Entity in No. 4 is Subawardee, Enter Name and Address of Prime:</b></p> <p>Congressional District, if known:</p>	
<p><b>6. Federal Department/Agency:</b></p> <p>NTIA, Department of Commerce</p>	<p><b>7. Federal Program Name/Description:</b></p> <p>BTOP  CFDA Number, if applicable: 11.557</p>	
<p><b>8. Federal Action Number, if known:</b>  0660-ZA28</p>	<p><b>9. Award Amount, if known:</b>  Applying for approx. \$39M (\$49M Total Project)</p>	
<p><b>10. a. Name and Address of Lobbying Registrant</b>  <i>(if individual, last name, first name, MI):</i></p> <p>Dutko Worldwide, LLC  412 First St., SE  Suite 100  Washington DC 20003</p>	<p><b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i>  <i>(last name, first name, MI):</i></p> <p>Bayliss, Kim K.  Donaldson, Nancy A.  Painter, Sally A.  Tramontano, Karen A.</p>	
<p><b>11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</b></p>	<p><b>Signature:</b> </p> <p><b>Print Name:</b> Joseph A. Calzone</p> <p><b>Title:</b> Vice President</p> <p><b>Telephone No.:</b> (518) 689-4551    <b>Date:</b> 08/04/09</p>	
<p><b>Federal Use Only</b></p>	<p>Authorized for Local Reproduction  Standard Form - LLL (Rev. 7-97)</p>	

### CERTIFICATION REGARDING LOBBYING LOWER TIER COVERED TRANSACTIONS

Applicants should review the instructions for certification included in the regulations before completing this form. Signature on this form provides for compliance with certification requirements under 15 CFR Part 28, "New Restrictions on Lobbying."

#### LOBBYING

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NAME OF APPLICANT

ION Holdco, LLC

AWARD NUMBER AND/OR PROJECT NAME

ION Upstate Rural Broadband Initiative

PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

Joseph A. Calzone - Vice President

SIGNATURE

*Joseph A. Calzone*

DATE

8/4/09

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Development Authority of the North Country

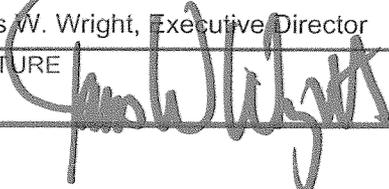
AWARD NUMBER AND/OR PROJECT NAME

Northern New York Open Access Wireless Network

PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

James W. Wright, Executive Director

SIGNATURE



DATE

8/13/2009

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Equal Opportunity and Nondiscrimination Certification**

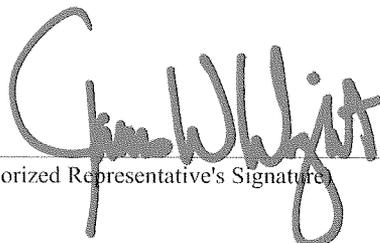
**U.S. Department of Agriculture  
Broadband Initiatives Program**

All loans and grants made under the Broadband Initiatives Program are subject to the nondiscrimination provisions of Title VI of the Civil Rights Act of 1964, as amended, (7 C.F.R. Part 15); Section 504 of the Rehabilitation Act of 1973, as amended, (29 U.S.C. 901 *et seq.*; 7 C.F.R. Part 15b); and the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101 *et seq.*; 45 C.F.R. Part 90), and Executive Order 11375, Amending Executive Order 11246, Relating to Equal Employment Opportunity (3 C.F.R. 1966, 1970).

All recipients of financial assistance from Rural Development, the prospective primary participant commits to carry out Rural Development's established policy to comply with the requirements of the above laws and executive orders to the effect that no person in the United States shall, " on the basis of race, color, national origin, handicap, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Broadband Initiatives Program.

We DANC (Dev Auth North Ctry) (the Applicant) hereby certify that, as a prospective recipient under the said Broadband Initiatives Program, we will comply with the above referenced laws and executive orders.

08-13-2009  
(Date)

  
(Authorized Representative's Signature)

James W. Wright  
Name:

Executive Director  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Equal Opportunity and Nondiscrimination Certification**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

All loans and grants made under the Broadband Initiatives Program are subject to the nondiscrimination provisions of Title VI of the Civil Rights Act of 1964, as amended, (7 C.F.R. Part 15); Section 504 of the Rehabilitation Act of 1973, as amended, (29 U.S.C. 901 *et seq.*; 7 C.F.R. Part 15b); and the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101 *et seq.*; 45 C.F.R. Part 90), and Executive Order 11375, Amending Executive Order 11246, Relating to Equal Employment Opportunity (3 C.F.R. 1966, 1970).

All recipients of financial assistance from Rural Development, the prospective primary participant commits to carry out Rural Development's established policy to comply with the requirements of the above laws and executive orders to the effect that no person in the United States shall, " on the basis of race, color, national origin, handicap, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Broadband Initiatives Program.

We ION HOLD CO LLC (the Applicant) hereby certify that, as a prospective recipient under the said Broadband Initiatives Program, we will comply with the above referenced laws and executive orders.

8/04/09

(Date)

Joseph A Calzone

(Authorized Representative's Signature)

Joseph A Calzone

Name:

VP

Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Regarding Architectural Barriers**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

All facilities financed with Rural Development loans that are open to the public, or in which physically handicapped persons may be employed or reside, must be designed, constructed, and/or altered to be readily accessible to, and usable by, handicapped persons. Standards for these facilities must comply with the Architectural Barriers Act of 1968, as amended, 42 U.S.C. §4151 *et seq.*) and with the Uniform Federal Accessibility Standards (UFAS), (Appendix A to 41 C.F.R. subpart 101-19.6).

As a prospective primary participant recipient of financial assistance from Rural Development, this organization commits to carry out Rural Development's established policy to comply with the requirements of the above referenced law to the effect that all facilities must be readily accessible to and usable by handicapped persons.

We, ION HOLD CO LLC (the Applicant) hereby certify that, as a prospective recipient under the Rural Broadband Initiatives Program, we are in compliance, or will be in compliance upon completion of the Project, with the above referenced law.

8/04/09  
(Date)

Joseph A Calzone  
(Authorized Representative's Signature)

Joseph A Calzone  
Name:

VP  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Regarding Architectural Barriers**

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Broadband Initiatives Program**

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08-13-2009  
(Date)

  
(Authorized Representative's Signature)

James W. Wright  
Name:

Executive Director  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Uniform Relocation Assistance and Real Property Acquisition  
Policies Act of 1970 Certification**

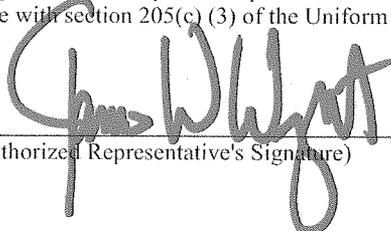
**U.S. Department of Agriculture  
Broadband Initiatives Program**

We DANC (Dev Auth N. Ctr) (the Applicant) assure the U.S. government that we will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 U.S.C. §4601 *et seq.*, and with implementing federal regulations in 49 C.F.R. Part 24 and 7 C.F.R. Part 21.

Specifically, we assure that whenever Federal financial assistance is used to pay for any part of the cost of a program or Project which will result in the displacement of any person:

- (a) Fair and reasonable relocation payments and assistance shall be provided to or for displaced persons in accordance with sections 202, 203, and 204 of the Uniform Act;
- (b) Relocation assistance programs offering the services described in section 205 of the Uniform Act shall be provided to displaced persons; and
- (c) Within a reasonable period of time prior to displacement, comparable replacement dwellings will be available to displaced persons in accordance with section 205(c) (3) of the Uniform Act.

08-13-2009  
(Date)

  
(Authorized Representative's Signature)

James W. Wright  
Name:

Executive Director  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Uniform Relocation Assistance and Real Property Acquisition  
Policies Act of 1970 Certification**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

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8/04/09

(Date)

Joseph A Calzone  
(Authorized Representative's Signature)

Joseph A Calzone  
Name:

VP  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Regarding Debarment, Suspension, and Other Responsibility Matters -  
Primary Covered Transactions**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

This certification is required by the regulations implementing Executive Order 12549, *Debarment and Suspension*, 7 C.F.R. § 3017.510, *Participants' Responsibilities*.

- (1) We Siow Hard Co LLC (the Applicant) (hereinafter the "Company") hereby certify to the best of our knowledge and belief that neither the Company, nor any of its principals:
- (a) are presently debarred, suspended, proposed for Debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
  - (b) have within a 3-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
  - (c) are presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
  - (d) have within a 3-year period preceding this Application had one or more public transactions (Federal, State, or local) terminated for cause or default.
- (2) If we are unable to certify to any of the statements in this certification, we shall attach an explanation hereto.

8/04/09  
(Date)

Joseph A Calzone  
(Authorized Representative's Signature)

Joseph A Calzone  
Name:

VP  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

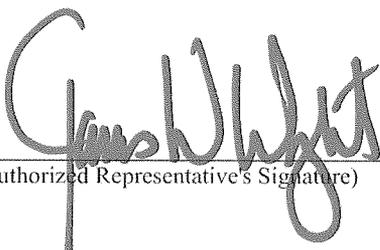
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Primary Covered Transactions**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

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- (a) are presently debarred, suspended, proposed for Debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
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- (2) If we are unable to certify to any of the statements in this certification, we shall attach an explanation hereto.

08-13-2009  
(Date)

  
(Authorized Representative's Signature)

James W. Wright  
Name:

Executive Director  
Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Regarding Lobbying for Contracts, Grants, Loans, and Cooperative Agreements**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

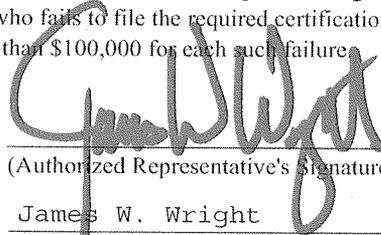
We DANC (Dev Auth N. Ctr) (the Applicant) the undersigned certify, to the best of our knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on our behalf, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant or loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, we shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. See <http://www.whitehouse.gov/omb/grants/sflllin.pdf> for Disclosure Instructions.
- (3) We shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by 31 U.S.C. § 1352. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

08-13-2009

(Date)



(Authorized Representative's Signature)

James W. Wright

Name:

Executive Director

Title:

**Broadband Infrastructure Application  
Submission to RUS (BIP) and NTIA (BTOP)**

**Certification Regarding Lobbying for Contracts, Grants, Loans, and Cooperative Agreements**

**U.S. Department of Agriculture  
Broadband Initiatives Program**

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- (1) No Federal appropriated funds have been paid or will be paid, by or on our behalf, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant or loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, we shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions. See <http://www.whitehouse.gov/omb/grants/sflllin.pdf> for Disclosure Instructions.
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8/04/09  
(Date)

Joseph A Calz  
(Authorized Representative's Signature)

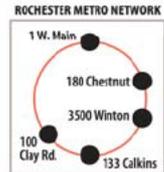
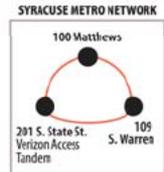
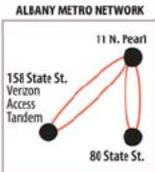
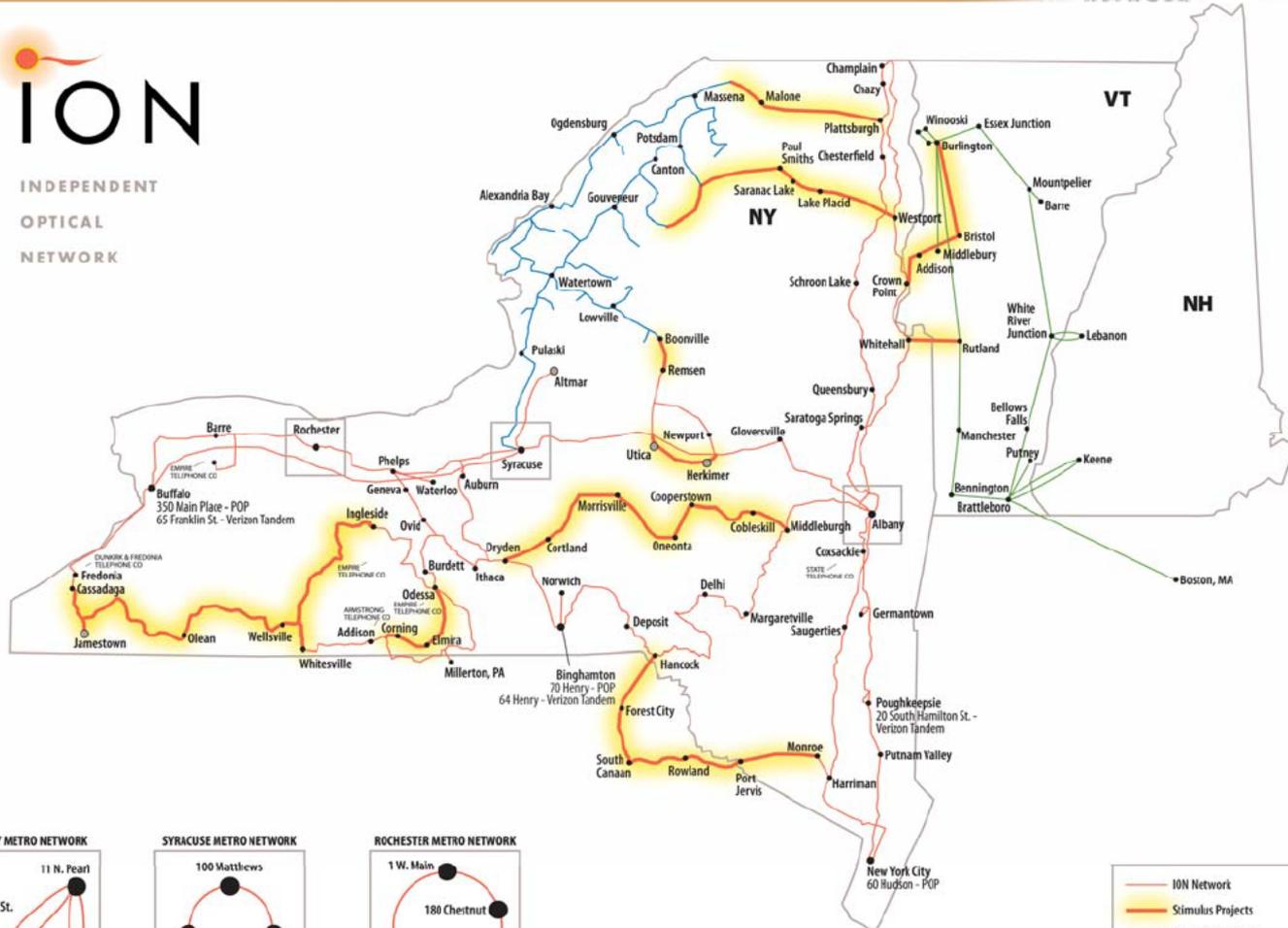
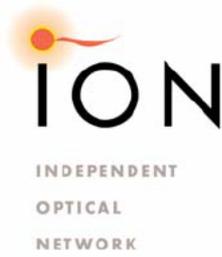
Joseph A Calzone  
Name:

VP  
Title:

139 Pages

Withheld in their entirety  
pursuant to FOIA Exemption 4  
(5 U.S.C. § 552 (b)(4))

# ION Map with Stimulus Projects



- ION Network
- Stimulus Projects
- Sovernet Network
- GATN Network
- ION Market (Future)

# Southern Tier West Fiber Backbone



Total Service Area Population*	19,732
Total Service Area Households*	8,333
Total Service Area Square Miles	2,038

Underserved Population	33,394
Underserved Households	15,775

Anchor Institutions	56
---------------------	----

Underserved Census Blocks	4
Unservd Census Blocks	0

**Map Reference Number: E51D-F1F5-4E06-9F95**

- Questionable Data from the online mapping tool – Total is less than the Underserved Population and Underserved Households

# Western NY Redundant Fiber Ring



Total Service Area Population	109,875
Total Service Area Households	51,127
Total Service Area Square Miles	1,532
Underserved Population	5,405
Underserved Households	2,495
Anchor Institutions	28
Underserved Census Blocks	7
Unserviced Census Blocks	0

Map Reference Number: 6405-A5EA-4BCF-8FB0

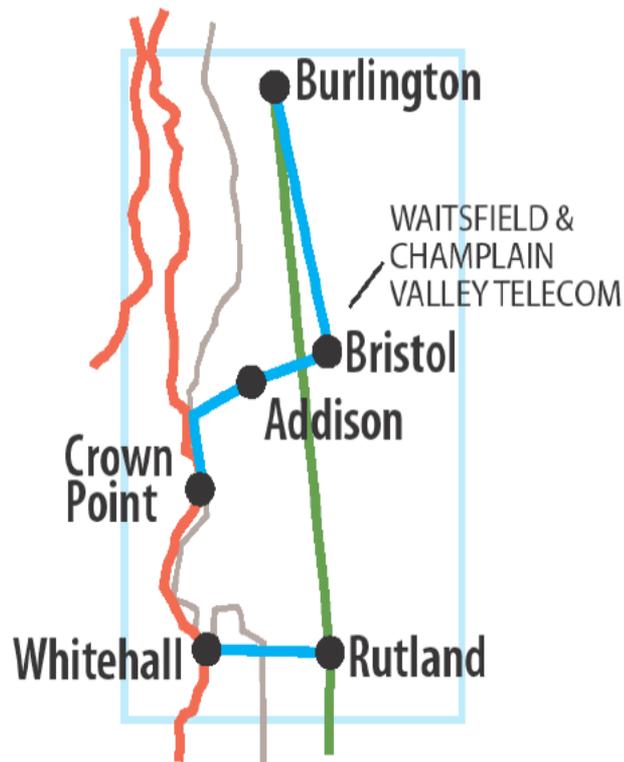
# Steuben & Chemung Counties Fiber Backbone



Total Service Area Population	140,525
Total Service Area Households	59,370
Total Service Area Square Miles	913
Underserved Population	32,593
Underserved Households	13,743
Anchor Institutions	51
Underserved Census Blocks	3
Unserviced Census Blocks	0

Map Reference Number: AF65-776C-433F-930D

# NY – VT & NH Fiber Connectivity



Total Service Area Population	204,327
Total Service Area Households	86,820
Total Service Area Square Miles	1524

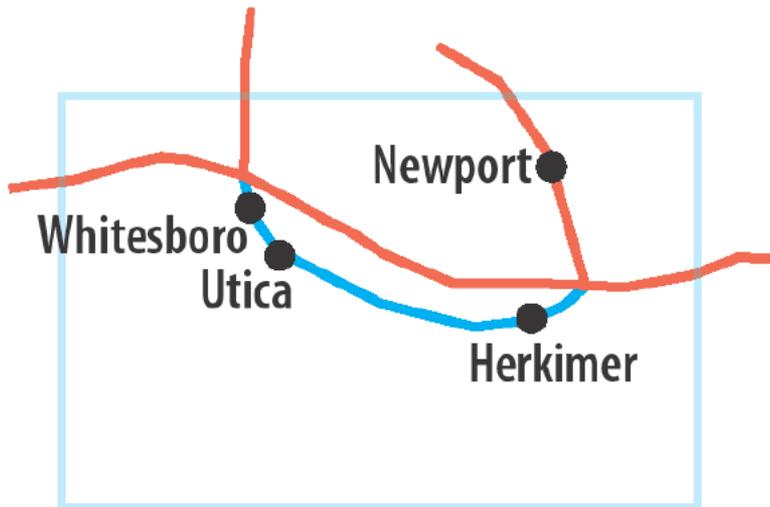
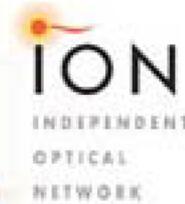
Underserved Population	40,141
Underserved Households	16,579

Anchor Institutions 5+

Underserved Census Blocks	1
Unerved Census Blocks	0

Map Reference Number: 21DE-FFF1-484B-A7A1

# Oneida & Herkimer Counties Fiber Backbone



Total Service Area Population	165,592
Total Service Area Households	72,074
Total Service Area Square Miles	380

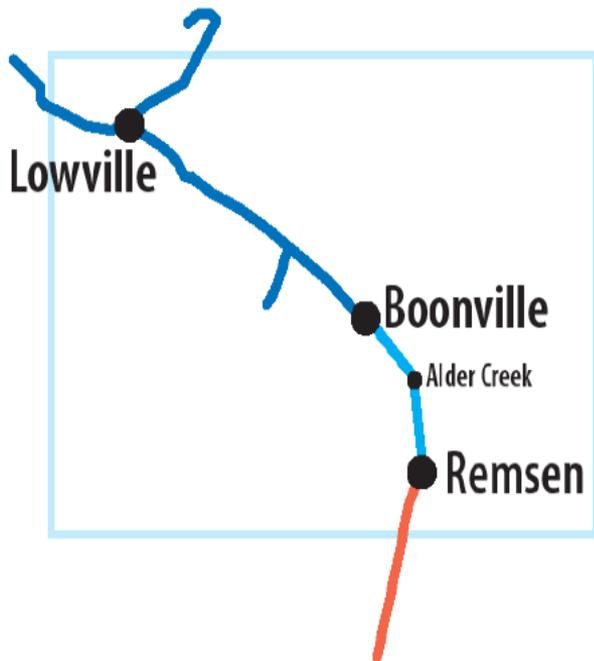
Underserved Population	96,833
Underserved Households	45,145

Anchor Institutions	44
---------------------	----

Underserved Census Blocks	0
Unerved Census Blocks	0

Map Reference Number: 6B9F-FBA0-4BF1-B8CF

# North Country Route Protection

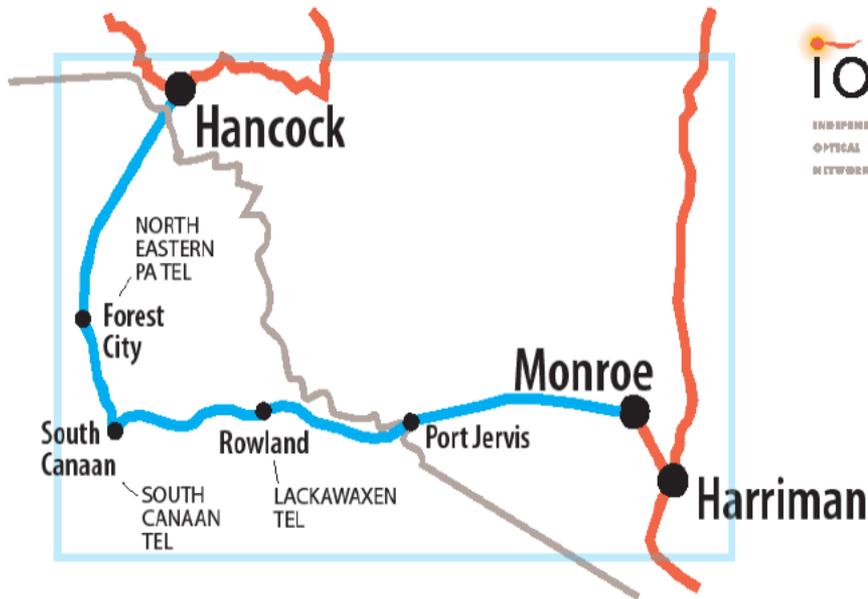
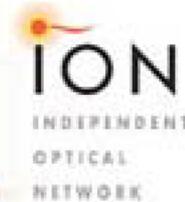


Total Service Area Population	106,372
Total Service Area Households	44,065
Total Service Area Square Miles	754
Underserved Population	39,175
Underserved Households	16,498
Anchor Institutions	25
Underserved Census Blocks	2
Unserviced Census Blocks	0

Map Reference Number: **CEDD-7B94-414C-BE4E**



# NY - PA Fiber Network Redundant Route



Total Service Area Population	383,567
Total Service Area Households	181,926
Total Service Area Square Miles	3,185

Underserved Population	4,768
Underserved Households	2,270

Anchor Institutions	13
---------------------	----

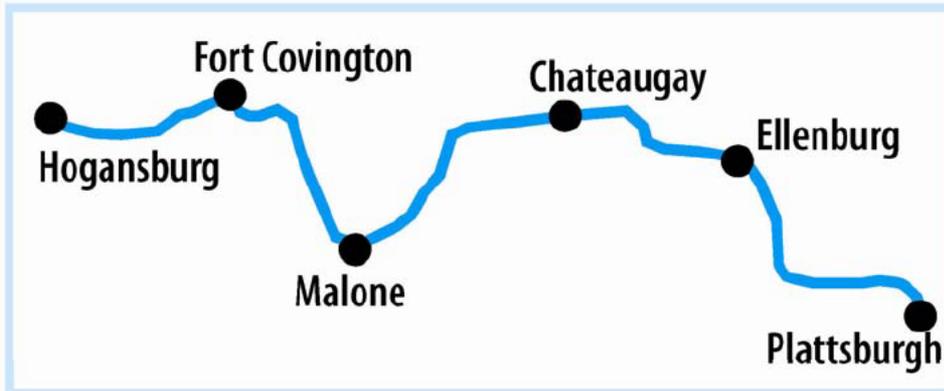
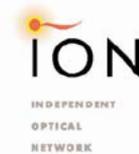
Underserved Census Blocks	1
Unserved Census Blocks	0

**Map Reference Number: C453-8DC1-4974-8412**

Note: Census Blocks Truncated at 7500 Blocks



# North Country Fiber Broadband Backbone



Total Service Area Population	102,332
Total Service Area Households	41,272
Total Service Area Square Miles	1,586

Underserved Population	362
Underserved Households	106

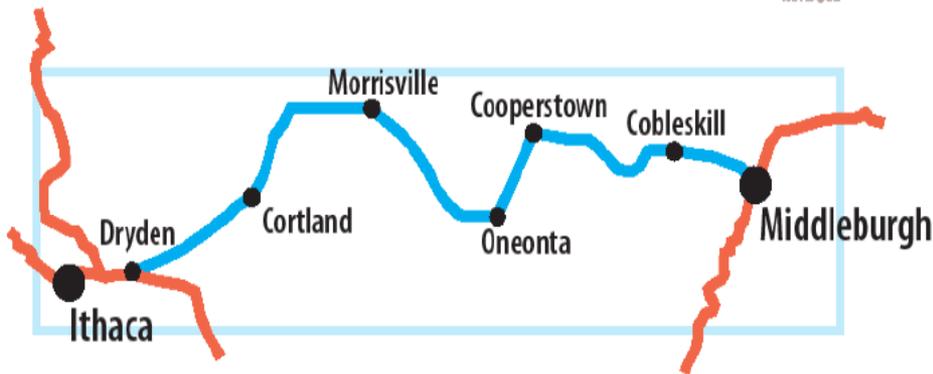
Anchor Institutions	28
---------------------	----

Underserved Census Blocks	6
Unserviced Census Blocks	4

Map Reference Number: 9737-730F-47E8-AF9D



# Southern Tier East 7 County Network



Total Service Area Population	297,494
Total Service Area Households	131,806
Total Service Area Square Miles	4,577

Underserved Population	1,730
Underserved Households	962

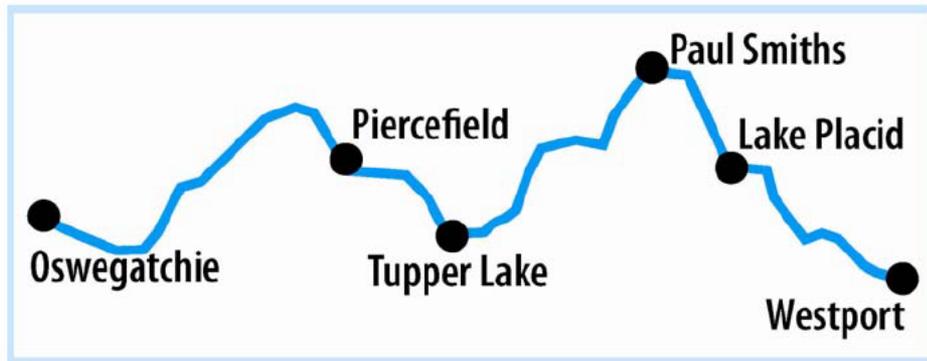
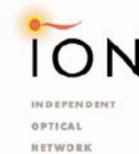
Anchor Institutions	69
---------------------	----

Underserved Census Blocks	5
Unserviced Census Blocks	2

**Map Reference Number: 1977-2A79-4E92-BA0E**

Note: Census Blocks were Truncated at 7500 Blocks

# Southern Adirondack Fiber Backbone



Total Service Area Population	62,545
Total Service Area Households	35,192
Total Service Area Square Miles	3,540

Underserved Population	912
Underserved Households	501

Anchor Institutions	21
---------------------	----

Underserved Census Blocks	3
Unerved Census Blocks	6

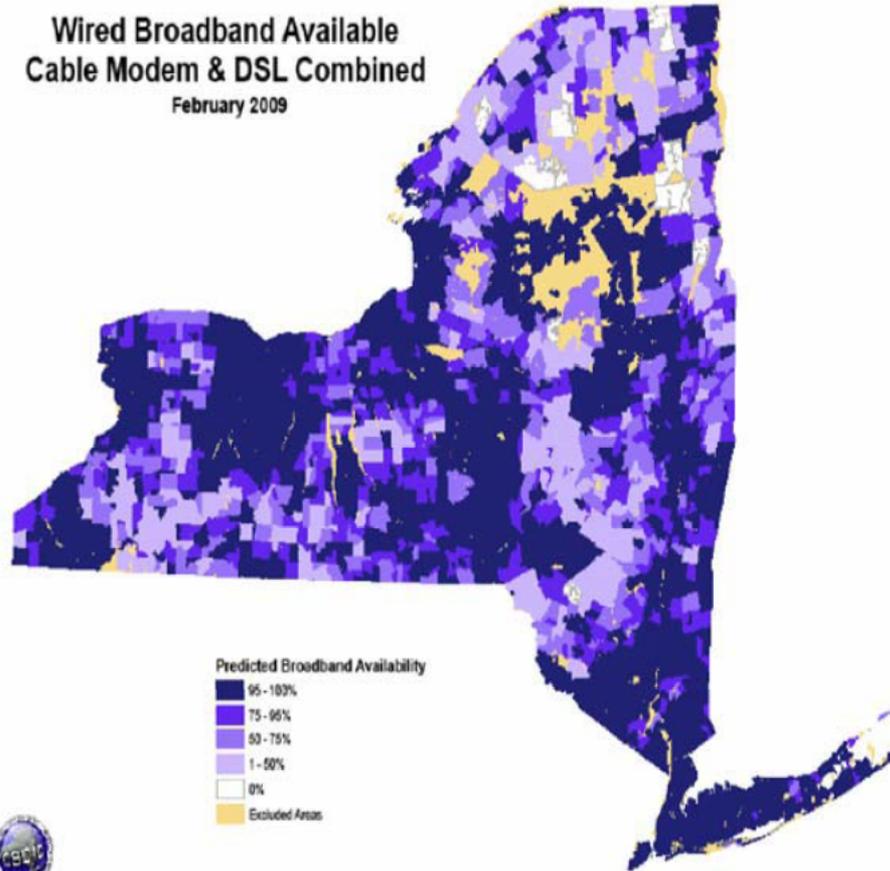
Map Reference Number: 79D0-416D-43C6-9A30



# NYS Broadband Availability

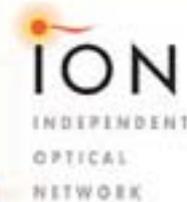


Wired Broadband Available  
Cable Modem & DSL Combined  
February 2009



Map created by NY's Office of Cyber Security and Critical Infrastructure Coordination

## Why these Projects?



- Promoting further broadband capabilities in rural areas, thus giving local businesses increased Internet bandwidth and an improved ability to grow
- Spurs new business development
- Encourages competition, thus increasing services and reducing costs
- Spurs short term and long term employment opportunities
  - ION buys local products
  - Employs a local workforce
  - Hires local companies
  - Enhances the viability of 12 independent telephone companies
    - Helping retain 300+ jobs, 110,000 voice lines, 25,000 broadband services and 12,000+ cable/video services
- Augments other networks and broadband projects in New York
  - Such as Development of the North Country, CBN Connect, Southern Tier West, Southern Tier East

## Question 41 – Attachment (Additional Information)

ION Development Agencies Partners

*Southern Tier West Regional Development and Planning Board* coordinates planning and development activities in Allegany, Cattaraugus, and Chautauqua Counties so as to promote social, physical, and economic development in these counties. See: [www.southerntierwest.org/](http://www.southerntierwest.org/).

*Southern Tier Central Regional Development and Planning Board* provides a variety of services to units of government, agencies, and the private sector in Chemung, Schuyler and Steuben Counties of New York State. See: <http://www.stcplanning.org/>

*Southern Tier East Regional Development and Planning Board's* mission is to partner with member counties to identify and address multi-county issues in order to improve the quality of life within the region. See: <http://www.steny.org/>

*CBN Connect* is intended to be a wholesale "carrier's carrier," providing open services broadband transport throughout the Clinton, Essex and Franklin Tri-County region of New York State. This will not only enable service providers to provide state of the art broadband services in previously unreachable areas, but also in most cases allow the residents to have a choice of service provider. See: [www.cbnconnect.org](http://www.cbnconnect.org). The ION network will provide broadband connectivity out of the proposed CBN services region.

The proposed network within this application, as well as the current ION network will be leveraged to assist these agencies/entities in fulfilling their missions and providing for the residents and businesses in their respective areas. The ION network brings affordable, reliable, high speed broadband connections to these unserved and underserved rural areas, where no other provider has. ION will help support the entities so that they can operate and maintain mission services, while working to attract more last mile service providers and additional businesses to support the local economy. Without ION and the robust network it brings in support, these areas would remain high capacity broadband challenged, and could easily be left behind in the Information Era.

Additionally, ION is working closely with the departments of New York State shown below, in an effort to bring redundant, affordable, high capacity broadband to as many of their specific locations as possible throughout the state.

*New York State Office of Mental Health* -New York State has a large, multi-faceted mental health system that serves more than 500,000 individuals each year. The Office of Mental Health (OMH) operates psychiatric centers across the state, and also regulates, certifies and oversees more than 2,500 programs, which are operated by local governments and nonprofit agencies. These programs include various inpatient and

outpatient programs, emergency, community support, and residential & family care programs.

To complement these various programs, the OMH entities have the ability to apply for premise equipment and health services grants that are available. The specific telemedicine applications of interest to OMH are described in the response to Question 11, but as an overview these grants fall under the Telemedicine category and utilize broadband for tele-psychiatry, tele-counseling, tele-training, electronic medical records, etc.

*New York State Department of Corrections (DOCS)* – The NYS DOCS mission is to enhance public safety by providing appropriate treatment services, in safe and secure facilities, that address the needs of all inmates so they can return to their communities better prepared to lead successful and crime-free lives. As part of its application, ION has lateral network extensions to 14 maximum-security prisons, with DOCS requiring a minimum connection of 1Gbps at each location.

These agencies need high speed and affordable broadband connections to perform their day to day operational duties and improve their ability to provide better, more reliable service to their customers. Both agencies have provided ION with letters of support for this application.

## **Question #8 – Project Overview Attachment**

### **Project 1: Southern Tier West Fiber Backbone - Whitesville to Jamestown**

ION in collaboration with Southern Tier West, Dunkirk-Fredonia Tel and Zito Media Communications propose a three county network, intended to commence with a 115-mile core fiber broadband backbone to be constructed and maintained by ION.

“Last mile” service providers will introduce robust voice and broadband services to schools/colleges, healthcare, government and businesses along this middle mile segment. This build goes through 10 towns with a total population of 81,448; representing 37,673 households, 5,063 businesses and 56 anchor institutions.

### **Project 2: Western New York Redundant Fiber Ring (via Armstrong Tel, Empire Tel and Frontier Communications)**

ION in conjunction with Empire Telephone, Armstrong Telephone, and Frontier Communications propose construction of a 140-mile route protected fiber broadband backbone to connect Odessa, Prattsburg, Alfred, Almond and Naples, NY. This build goes through 11 towns, with a total population of 47,990; representing 20,749 households, 2,677 businesses and 28 anchor institutions.

### **Project 3: Chemung and Steuben County Fiber Backbone Network**

The Chemung and Steuben county areas of NY are vastly underserved with reliable and affordable broadband services. The route will also go through Painted Post, Corning, and Elmira, and will connect to Corning Research and Development and other anchor institutions in the region.

This build goes through 5 towns, with a total population of 65,825; representing 28,810 households, 4,564 businesses, and 51 anchor institutions.

### **Project 4a/4b: New York - VT/N. Hampshire Network Connectivity (Crown Point, NY to Burlington, VT) and (Whitehall, NY to Rutland, VT)**

ION in collaboration with Sovernet Communications, a telecommunications company serving Northern New England with reliable telephone and critical broadband, will construct fiber to connect the ION Upstate New York network to Sovernet’s (OC-192) broadband backbone located in Vermont and Western NH. This build will enable delivery of services to rural areas along this route, reduce the cost of Internet connectivity for northern New England carriers such as Waitsfield-Champlain Telephone Company, and create a redundant, reliable backbone between upstate NY and Northern New

England. The wireless providers AT&T (f/n/a Cingular) and Verizon Wireless are seeking access to this infrastructure to connect existing cell towers and newly created cell towers to Mobile Switching Centers across the three states of New York, Vermont, and New Hampshire.

This build goes through 9 towns with a total population of 93,843; representing 40,193 households, 7,750 businesses, and at least 5 anchor institutions plus those in Rutland and Burlington, VT.

### **Project 5: Herkimer and Oneida County Fiber Backbone Network**

The Herkimer and Oneida county areas of NY are vastly underserved with reliable and affordable broadband services. The route will go through Utica and Herkimer and connect to anchor institutions as well as the major cellular providers in the area.

Regional RLEC's, CLEC's, and Wireless providers all need redundant and affordable fiber broadband access to these areas to better serve their customers and the overall territory. This build goes through 5 towns, with a total population of 90,644; representing 42,428 households, 4,657 businesses and 44 anchor institutions.

### **Project 6: ION and DANC - North Country Route Protection (Boonville to Holland Patent), including strategic lateral links (Projects 6a, 6b, and 6c)**

ION in collaboration with DANC will construct the proposed routes, which provides government (Ft Drum), educational, strategic business, and service provider customers the benefits of affordable access and route protection. The lateral construction includes links to NY Power Authority, State University of NY Institute of Technology, Griffis Business Park (needs Internet 2 for Dept. of Defense), and other strategic locations. It will also allow the hundreds of other businesses in the area to be better served with reliable and affordable broadband services.

This build goes through 5 towns with a total population of 12,334; representing 5,773 households, 1,081 businesses, and 25 anchor institutions.

### **Project 7: New York - Pennsylvania Fiber Network Redundant Route via (3) PA Telephone Companies**

ION will construct and lease fiber from an owner company (Hancock Telephone) thru Port Jervis and on to Monroe, NY. This fiber route goes through the service areas of Lackawaxen, South Canaan, and North Eastern Pennsylvania Telephone Companies, enabling those companies to upgrade their broadband services and improve reliability of

service. This fiber build will also provide ION with an additional route for diversity reasons from the Binghamton, New York area.

This build goes through 9 towns with a total population of 62,477; representing 21,913 households, 4,469 businesses, and 13 anchor institutions.

**Project 8: North Country Broadband Backbone (Massena to Plattsburgh), including strategic lateral links (Projects 8a, 8b, and 8c)**

ION in collaboration with DANC will construct a network from Massena, NY to Plattsburgh, NY that effectively completes a redundant ring across the northern part of the state. These connections will allow ION and DANC to provide much needed affordable broadband access and route redundancy in the vastly un- and underserved northern part of the state. It will provide robust new service availability to the towns and institutions the network goes through. The lateral links include healthcare and New York State Department of Corrections facilities.

This build goes through towns with a total population of 41,123; representing 19,107 households, 2323 businesses, and 28 anchor institutions.

**Project 9: Southern Tier East Fiber Backbone - 7 Community Network**

ION will construct a fiber broadband network across a seven county area; starting from ION's Dryden network POP and ending at the ION network POP in Middleburgh. These counties and the areas within them are vastly under and un-served, and the ION fiber network will provide affordable and reliable broadband access for the creation of new services in these rural areas. The route will be connected to and intends to serve SUNY campuses in Cobleskill, Morrisville, Oneonta, and Cortland, as well as the other anchor governmental, educational, and healthcare institutions, such as Bassett Healthcare.

This build goes through 14 towns with a total population of 86,593; representing 34,834 households, 5,854 businesses, and 69 anchor institutions.

**Project 10: Southern Adirondack Fiber Backbone, including lateral links (Project 10a and 10b)**

In collaboration, ION and DANC will construct 506 miles of fiber in the Southern Adirondacks, which are vastly underserved with reliable and affordable broadband services. It will have direct links to New York State Department of Corrections and healthcare facilities. as well as 20 other strategic institutions.

The primary build goes through 5 towns with a total population of 10,815; representing 4519 households, 586 businesses, and 21 anchor institutions.

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## Question 14 - Proposed Funded Service Area (Middle Mile Project)

Project Name	Population	# of Households	# of Businesses	Total Anchor Institutions
Project 1: Southern Tier West Fiber Backbone - Whitesville to Jamestown	81448	37673	5063	56
Project 2: Western New York Redundant Fiber Ring (via Armstrong Tel, Empire Tel and Frontier)	47990	20749	2677	28
Project 3: Chemung and Stueben County Fiber Backbone Network	65825	28810	2677	51
Project 4 New York - VT/NH Network Connectivity	93843	40193	7750	5
Project 5: Herkimer and Oneida County Fiber Backbone Network	90644	42428	4657	44
Project 6: ION and DANC - North Country Route Protection (Boonville to Holland Patent)	12334	5773	1081	25
Project 7: New York - Pennsylvania Fiber Network Redundant Route via (3) PA Telephone Companies	62477	21913	4469	13
Project 8: North Country Fiber Broadband Backbone (Massena to Plattsburgh)	40757	15827	2951	28
Project 9: Southern Tier East Fiber Backbone - 7 Community Network	86593	34834	5854	69
Project 10: Southern Adirondack Fiber Backbone	10815	4519	986	21
<b>Total</b>	<b>592726</b>	<b>252719</b>	<b>38165</b>	<b>340</b>

\* For contiguous census blocks, please see the online mapping tool. Total number of census blocks are too numerous to list, 10,000 blocks +

## ION-DANC Connected Strategic Institutions - as part of Application

<u>Premise</u>	<u>A.K.A</u>	<u>Number</u>	<u>Street</u>	<u>Town</u>	<u>State</u>
<b>ION Target Institutions</b>					
SUNY Oneonta	Oneonta State College	108	Ravine Parkway	Oneonta	NY
Hartwick College		1	Hartwick Drive	Oneonta	NY
SUNY Cobleskill			Route 7	Cobleskill	NY
Bassett Hospital		1	Atwell Road	Cooperstown	NY
SUNY Morrisville	Morrisville State College		Eaton Street	Morrisville	NY
SUNY Cortland		94	Prospect Terrace	Cortland	NY
Corning Research & Development	CORNING SULLIVAN PARK		Science Center Drive	Painted Post	NY
Verizon Wireless	Higman Hill Road			Corning	NY
Elmira College		1	Park Place	Elmira	NY
Elmira Correctional Facility		1879	Davis St	Elmira	NY
St. James Mercy Health	HealthCare	411	Canisteo Street	Hornell	NY
Stueben County Offices	County Seat	3	Pulteney Square	Bath	NY
Olean Hospital	Health Care	515	Main Street	Olean	NY
Jamestown Community College	College	525	Falconer St	Jamestown	NY
St Bonaventure	University	3261	West State Road	St Bonaventure	NY
<b>DOC's Correctional Facilities</b>					
Attica Correctional Facility	NYSDOCs	16-18	Prospect	Attica	NY
Auburn Correctional Facility	NYSDOCs	36	South St	Auburn	NY
Bedford Hills Correction Facility	NYSDOCs	247	Harris Road	Bedford Hills	NY
Coxsackie Correctional Facility	NYSDOCs		Rte 9W	Coxsackie	NY
Downstate Correctional Facility	NYSDOCs	122	Red SchoolHouse Rd	Fishkill	NY
Eastern NY Correctional Facility	NYSDOCs		Institution Dr	Napanoch	NY
Elmira Correctional Facility	NYSDOCs	1879	Davis St	Elmira	NY
Five Points Correctional Facility	NYSDOCs		State Route 96	Romulus	NY
Great Meadows Correctional Fac	NYSDOCs	11739	State Route 22	Comstock	NY
Green Haven Correctional Facs	NYSDOCs	594	State Route 216	Stormville	NY
Shawangunk Correctional Facs	NYSDOCs	750	Prison Road	Walkill	NY
Sing Sing Correctional Facs	NYSDOCs	354	Hunter st	Ossining	NY
Southport Correctional Facs	NYSDOCs	236	Bob Masia Dr	Pine City	NY
Sullivan Correctional Facility	NYSDOCs	325	Riverside Dr	Fallsburg	NY
Wende Correctional Facility	NYSDOCs	3040	Wende Road	Alden	NY

**DANC Target Institutions**  
Project #1 Expand Network

**Close Ring- Boonville to Utica**

New York Power Authority  
 SUNY Institute of Technology  
 Griffiss Business & Technology Park

Clark Energy Center  
 (Connect Ft. Drum)

Glass Factory Rd  
 12 North Horatio St.  
 153 Brooks Rd

Marcy NY  
 Utica NY  
 Rome NY

**Healthcare**

**OMH SITES in DANC**

Lewis County Community Services Board  
 St. Lawrence County Community Services Board  
 St. Lawrence Psychiatric Center  
 St. Regis Mohawk Education & Comm. Fund, Inc.  
 St. Lawrence Psychiatric Center  
 St. Lawrence Psychiatric Center  
 St. Lawrence Psychiatric Center  
 North Borders  
 Jefferson Cty ICM  
 Calcium School  
 Indian River MH  
 Indian River IS

Lewis Co. Community Mental Health Center Clinic  
 St. Lawrence County Mental Health Clinic  
 Gouverneur Mental Health Clinic  
 St. Regis Mohawk Mental Health Clinic  
 Massena Mental Health Center  
 Ogdensburg Mental Health Clinic  
 Children & Youth Outpatient Clinic  
 Room 14 Data Closet  
 Room 617  
 Room 165  
 Room 202  
 C230 Rm 218

7550 South State Street  
 80 State Highway 310  
 28 William Street  
 412 State Route 37  
 23 Maple Street  
 109 Ford Street  
 1 Chimney Point Drive  
 100 Ford  
 Dulles 317 Washington  
 25440 Indian River Dr..  
 32735A Co Rt 29  
 32430 US RT 11

Lowville NY  
 Canton NY  
 Gouverneur NY  
 Akwesasne NY  
 Massena NY  
 Ogdensburg NY  
 Ogdensburg NY  
 Ogdensburg NY  
 Watertown NY  
 Philadelphia NY  
 Philadelphia NY

**FDRHPO Add'l sites**

Beaver River Health Center  
 South Lewis Health Center  
 Adams Community Health Center  
 Harrisville Family Health Center  
 Sackets Harbor Family Health Center  
 Deferiet Family Health Center  
 LeRay Crossing  
 Fort Drum/Samaritan Behavioral Health Clinic  
 Edwards Health Center  
 Harrisville Medical Center  
 Russell Medical Center  
 Watertown VA Clinic  
 Pulmonary Associates of NNY  
 North Country Orthopaedic Group  
 Watertown Urgent Care  
 Med Ready Medical Group  
 North Country Urgent Care  
 Quik Med Urgent Care  
 Tug Hill Urgent Care  
 Mountain Medical of Watertown  
 Lewis County Mental Health  
 Massena Hospital

9536 State Route 126  
 3926 State Route 12  
 10881 US Route 11  
 14214 Church Street  
 10 Barracks Drive  
 2 Wilma Avenue  
 26908 Independence Way  
 165 Coleman Avenue  
 8 Church Street  
 8224 State Route 3  
 9 Pestle Street  
 1575 Washington Street  
 19320 US Route 11  
 1571 Washington Street  
 1213 Coffeen Street  
 19472 US Route 11  
 21017 State Route 12F  
 727 Washington Street  
 7518 South State Street  
 1213 Coffeen Street  
 S Sate St.  
 1 Hospital Dr.

Beaver Falls NY  
 Lyons Falls NY  
 Adams NY  
 Harrisville NY  
 Sackets Harbor NY  
 Deferiet NY  
 Evans Mills NY  
 Watertown NY  
 Edwards NY  
 Harrisville NY  
 Russell NY  
 Watertown NY  
 Lowville NY  
 Watertown NY  
 Lowville NY  
 Massena NY

**5 DOC Sites**

Ogdensburg Correctional Facility  
 Cape Vincent Correctional Facility  
 Gouverneur Correctional Facility

1 Correction Way  
 Rt. 12E, P.O. Box 599  
 Scotch Settlement Rd.

Ogdensburg NY  
 Cape Vincent NY  
 Gouverneur, NY



Mental Health Association in Franklin County	552 State Route 86	Paul Smiths	NY
Franklin County Public Health	3 Main St.	Saranac Lake	NY
Franklin County Community Services	17 Main Street	Saranac Lake	NY
Adirondack Medical Center	2233 State Route 86	Saranac Lake	NY
Rehabilitation Center	47 Park St	Tupper Lake	NY
Clinic	55 Church St	Tupper Lake	NY
Colby Center Psychiatric	Lake Colby Dr	Saranac Lake	NY
Clinic	45 Church St.	Lake Placid	NY
North Country Behavioral Healthcare	53 Riverside Dr.	Saranac Lake	NY
Alice Hyde Medical Center	133 PARK St.	Malone	NY
Caregivers	3066 State Rt 11#4	Malone	NY
North Country Health Care	24 Fourth	Malone	NY

**EDUCATION**

New York State Education Dept VESID	209 W Main St.	Malone	NY
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**BOCES**

North Franklin Education Center	23 Huskie Lane	Malone	NY
Adirondack Education Center	711 NYS Route 3	Saranac Lake	NY

**Colleges**

Paul Smiths College	Route 30	Paul Smith	NY
ESF-Ranger School	257 Ranger School Rd.	Wahakena	NY
North Country Community College	75 Williams St.	Malone	NY
North Country Community College	Santanoni Dr.	Saranac Lake	NY

**Counties**

Franklin County	355 W Main St	Malone	NY
Essex	Court Street	Elizabethtown	NY
Clinton	137 Margaret St.	Plattsburgh	NY

## List of Total Anchor Institutions respresented under ION-DANC Project

<u>Project #</u>	<u>Institution-Premise</u>	<u>A.K.A</u>	<u>Number</u>	<u>Street</u>	<u>Town</u>	<u>State</u>
1	Olean Hospital		515	Main Street	Olean	NY
1	Jamestown Community College		525	Falconer St	Jamestown	NY
1	St Bonaventure		3261	West State Road	St Bonaventure	NY
1	WOMANS CHRISTIAN ASSOC HOSPITAL		207	Foote Ave	Jamestown	NY
1	JAMESTOWN BUSINESS COLLEGE		7	Fairmount Ave	Jamestown	NY
1	JAMESTOWN HIGH SCHOOL		350	E. Second St	Jamestown	NY
1	SOUTHWESTERN SENIOR HIGH SCHOOL		600	Hunt Rd	Jamestown	NY
1	BETHEL BAPTIST CHRISTIAN ACADE		200	Hunt Rd	Jamestown	NY
1	SOUTHWESTERN ELEM SCHOOL		600	Hunt Rd	Jamestown	NY
1	PERSELL MIDDLE SCHOOL		375	Baker St	Jamestown	NY
1	WASHINGTON MIDDLE SCHOOL		159	Buffalo St	Jamestown	NY
1	JEFFERSON MIDDLE SCHOOL		195	Martin Rd	Jamestown	NY
1	CARLYLE C. RING ELEMENTARY SCHOOL		333	Buffalo St	Jamestown	NY
1	LINCOLN ELEMENTARY SCHOOL		301	Front St	Jamestown	NY
1	SOUTHWESTERN MIDDLE SCHOOL		600	Hunt Rd	Jamestown	NY
1	MILTON J. FLETCHER ELEMENTARY SCHOOL		301	Cole Ave	Jamestown	NY
1	SAMUEL G. LOVE ELEMENTARY SCHOOL		50	E. 8th St	Jamestown	NY
1	CLINTON V. BUSH ELEMENTARY SCHOOL		150	Pardee Ave	Jamestown	NY
1	HOLY FAMILY CATHOLIC SCHOOL		1135	N. Main St	Jamestown	NY
1	GUSTAVUS ADOLPHUS LEARNING CTR		705	Falconer St	Jamestown	NY
1	JAMESTOWN S D A SCHOOL		130	McDaniel Ave	Jamestown	NY
1	MONTESSORI CHIDRENS HOUSE OF J				Jamestown	NY
1	JAMES PRENDERGAST LIBRARY ASSOCIATION		509	Cherry St	Jamestown	NY
1	HAZELTINE PUBLIC LIBRARY		891	Busti-Sugar Grove Rd	Jamestown	NY
1	FLUVANNA FREE LIBRARY		3532	Fluvanna Ave	Jamestown	NY
1	RANDOLPH SENIOR HIGH SCHOOL		18	Main Street	Randolph	NY
1	RANDOLPH ACADEMY		336	Main Street	Randolph	NY
1	G.N. CHAPMAN ELEMENTARY SCHOOL		22	Main Street	Randolph	NY
1	RANDOLPH MIDDLE SCHOOL		18	Main Street	Randolph	NY
1	RANDOLPH FREE LIBRARY		26	Jamestown St	Randolph	NY
1	CUBA MEMORIAL HOSPITAL		140	W. Main St	Cuba	NY
1	CUBA-RUSHFORD HIGH SCHOOL		5476	Rt 305 N	Cuba	NY
1	CUBA ELEMENTARY SCHOOL		15	Elm St	Cuba	NY
1	CUBA-RUSHFORD MIDDLE SCHOOL		5476	Rt 305 N	Cuba	NY
1	CUBA CIRCULATING LIBRARY ASSOCIATION		39	E. Main St	Cuba	NY
1	WELLSVILLE ELEMENTARY SCHOOL		98	School St	Wellsville	NY
1	WELLSVILLE MIDDLE SCHOOL		126	W. State St	Wellsville	NY
1	WELLSVILLE SENIOR HIGH SCHOOL		126	W. State St	Wellsville	NY
1	IMMACULATE CONCEPTION SCHOOL		24	Maple Ave	Wellsville	NY
1	DAVID A HOWE PUBLIC LIBRARY		155	N. Main St	Wellsville	NY
1	JAMESTOWN COMMUNITY COLLEGE-CATTARAUGUS COUNTY		244	N. Union St	Olean	NY
1	OLEAN BUSINESS INSTITUTE		301	N. Union St	Olean	NY
1	CONTINENTAL SCHOOL OF BEAUTY CULTURE		515	N. Union St	Olean	NY
1	CATTARAUGUS COUNTY BOCES SCHOOL OF PRACTICAL NURS		1825	Windfall Rd	Olean	NY
1	SAINT FRANCIS SCHOOL OF PRACTICAL NURSING		2221	W. State St	Olean	NY
1	OLEAN MIDDLE SCHOOL		401	Wayne St	Olean	NY
1	OLEAN MIDDLE SCHOOL		401	Wayne St	Olean	NY
1	EAST VIEW ELEMENTARY SCHOOL		690	E. Spring St	Olean	NY
1	WASHINGTON WEST ELEMENTARY SCHOOL		1626	Washington St	Olean	NY
1	BOARDMANVILLE ELEMENTARY SCHOOL		622	Main Street	Olean	NY
1	IVERS J. NORTON ELEMENTARY SCHOOL		411	W. Henley St	Olean	NY

1	NORTH HILL ELEMENTARY SCHOOL		102	W. Forest Ave	Olean	NY
1	OLEAN SENIOR HIGH SCHOOL		410	W. Sullivan St	Olean	NY
1	ARCHBISHOP WALSH HIGH SCHOOL		208	N. 24th St	Olean	NY
1	SOUTHERN TIER CATHOLIC SCHOOL		205	W. Henley St	Olean	NY
1	OLEAN PUBLIC LIBRARY		134	N. Second St	Olean	NY
2	St. James Mercy Health		411	Canisleo Street	Hornell	NY
2	Stueben County Offices	County Seat	3	Pulteney Square	Bath	NY
2	IRA DAVENPORT MEMORIAL HOSPITAL		350	Route 54	Bath	NY
2	NICHOLAS NOYES MEMORIAL HOSPITAL				Dannsville	NY
2	JONES MEMORIAL HOSPITAL		191	N. Main St	Wellsville	NY
2	SUNY COLLEGE OF TECHNOLOGY AT ALFRED				Alfred	NY
2	Hornell Senior High School				Hornell	NY
2	Hornell Intermediate School				Hornell	NY
2	Bryant School				Hornell	NY
2	St. Ann Elementary School				Hornell	NY
2	Hornell Public Library				Hornell	NY
2	Howard Public Library				Hornell	NY
2	TUSCARORA ELEMENTARY SCHOOL		7	Cleveland Dr	Addison	NY
2	ADDISON PUBLIC LIBRARY		6	South Street	Addison	NY
2	HAVERLING SENIOR HIGH SCHOOL		25	Ellas Ave	Bath	NY
2	VICTORY BAPTIST ACAD		5349	Buck Settlement Rd	Bath	NY
2	GRACE CHRISTIAN ACADEMY		6877	E. Williams St Ext	Bath	NY
2	Vernon E. Whitman Primary School		216	Maple Hts	Bath	NY
2	Haverling Middle School		25	Ellas Ave	Bath	NY
2	Dana L. Lyon Elementary School		25	Ellas Ave	Bath	NY
2	DORMANN LIBRARY		101	W. Morris St	Bath	NY
2	NICHOLAS NOYES MEMORIAL HOSPITAL		111	Clara Barton St	Dansville	NY
2	Dansville Senior High School		282	Main Street	Dansville	NY
2	Dansville Primary School		31	Clara Barton St	Dansville	NY
2	ELLIS B. HYDE ELEMENTARY SCHOOL		280	Main Street	Dansville	NY
2	St. Mary Elementary School		43	Elizabeth Street	Dansville	NY
2	Dansville Public Library		200	Main Street	Dansville	NY
3	Corning Research & Development	CORNING SULLIVAN PARK		Science Center Drive	Painted Post	NY
3	Verizon Wireless	Higman Hill Road			Corning	NY
3	Elmira College		1	Park Place	Elmira	NY
3	Elmira Correctional Facility		1879	Davis St	Elmira	NY
3	CORNING COMMUNITY COLLEGE				Corning	NY
3	Corning Hospital		176	Denison Parkway East	Corning	NY
3	Arnot Ogden Medical Center				Elmira	NY
3	St. Joseph's Hospital				Elmira	NY
3	Elmira Psych Center				Elmira	NY
3	Corning-Painted Post East High School		201	Cantigny St	Corning	NY
3	Corning-Painted Post High School Learning Ctr		1	Academic Dr	Corning	NY
3	Christian Learning Ctr		109	Ellicott St	Corning	NY
3	Kings Way Christian Academy		199	E. Corning Rd.	Corning	NY
3	Corning Free Academy Middle School		11	W. Third St	Corning	NY
3	Northside Blodgett Middle School		143	Princeton Ave	Corning	NY
3	Frederick Carder Elementary School		289	State St	Corning	NY
3	William E. Severn Elementary School		36	McMahon Ave	Corning	NY
3	Winfield Street Elementary		193	Winfield Street	Corning	NY
3	Hugh W. Gregg Elementary School		164	Flint Ave	Corning	NY
3	Kent W. Phillips Elementary School		120	Corning Blvd	Corning	NY
3	All Saints Academy		158	State St	Corning	NY
3	Southeast Steuben County Library			Nassar Civic Plaza	Corning	NY
3	Elmira Business Institute		303	N. Main St	Elmira	NY

3	ARNOT-OGDEN MEDICAL CENTER SCHOOL OF RAD TECHN	600	Roe Ave	Elmira	NY
3	ARNOT-OGDEN MEDICAL CENTER SCHOOL OF NURSING	600	Roe Ave	Elmira	NY
3	SCHUYLER-CHEMUNG-TIOGA BOCES LPN PROGRAM	459	Philo Rd	Elmira	NY
3	SOUTHSIDE HIGH SCHOOL	777	S. Main St	Elmira	NY
3	Elmira Free Academy	933	Hoffman St	Elmira	NY
3	Elmira Alternative High School	414	David St	Elmira	NY
3	Notre Dame High School	1400	Maple Ave	Elmira	NY
3	Elmira Christian Academy	235	E. Miller St	Elmira	NY
3	Broadway Middle School	1000	Broadway	Elmira	NY
3	Ernie Davis Middle School	610	Lake St	Elmira	NY
3	Hendy Avenue School	110	Hendy Ave	Elmira	NY
3	Diven School	1115	Hall St	Elmira	NY
3	Parley Coburn School	216	Mt Zoar St	Elmira	NY
3	Broadway Elementary School	1000	Broadway	Elmira	NY
3	Fassett Elementary School	309	W. Thurston St	Elmira	NY
3	Riverside School	409	Riverside Ave	Elmira	NY
3	Thomas K. Beecher School	310	Sullivan St	Elmira	NY
3	HOLY FAMILY PRIMARY SCHOOL	421	Fulton St	Elmira	NY
3	HOLY FAMILY JUNIOR HIGH SCHOOL	1010	Davis St.	Elmira	NY
3	HOLY FAMILY INTERMEDIATE	301	Demarest Parkway	Elmira	NY
3	ADVENTIST CHRISTIAN SCHOOL	809	Maple Ave	Elmira	NY
3	STEELE MEMORIAL LIBRARY	101	E. Church St	Elmira	NY
3	Corning-Painted Post West High School	35	Victory Hwy	Painted Post	NY
3	HOPE CHRISTIAN ACADEMY	22	Johns St	Painted Post	NY
3	Erwin Valley Elementary School	16	Beartown RD.	Painted Post	NY
3	Calvin U. Smith Elementary	3414	Stanton St	Painted Post	NY
3	Frank F. Pierce Early Childhood Center	3805	E. Meads Creek Rd	Painted Post	NY
3	LINDLEY PRESHO ELEMENTARY SCHOOL	9183	Presho School Rd	Painted Post	NY
4	Crown Point Central School	2758	Main Street	Crown Point	NY
4	Hammond Library		Main Street	Crown Point	NY
4	Whitehall Junior-Senior High School	87	Buckley Rd	Whitehall	NY
4	Whitehall Elementary School	99	Buckley Rd	Whitehall	NY
4	Whitehall Free Library	12	Williams St	Whitehall	NY
5	W.A. Wetzel Elementary School	4329	Peterboro St	Vernon	NY
5	Vernon Public Library	4441	Peterboro St	Vernon	NY
5	Whitesboro Middle School	75	Oriskany Blvd	Whitesboro	NY
5	Westmoreland Road Elementary School	8596	Westmoreland Rd	Whitesboro	NY
5	Harts Hill School	8551	Clarks Mill Rd	Whitesboro	NY
5	Parkway Middle School	65	Oriskany Blvd	Whitesboro	NY
5	Dunham Public Library	76	Main Street	Whitesboro	NY
5	Herkimer County Community College		Reservoir Rd	Herkimer	NY
5	HERKIMER COUNTY BOCES PRACTICAL NURSING PROGRAM	352	Gros Blvd	Herkimer	NY
5	Herkimer High School	801	W. German St	Herkimer	NY
5	Herkimer Elementary School	255	Gros Blvd	Herkimer	NY
5	ST. FRANCIS DE SALES REGIONAL	220	Henry Street	Herkimer	NY
5	FRANK J. BASLOE LIBRARY	245	N. Main St	Herkimer	NY
5	MOHAWK VALLEY PSYCHIATRIC CENTER	1400	Noyes St	Utica	NY
5	ST ELIZABETHS HOSPITAL	2209	Genesee St	Utica	NY
5	ST LUKES MEMORIAL HOSPITAL CENTER		Box 479	Utica	NY
5	MOHAWK VALLEY COMMUNITY COLLEGE-UTICA BRANCH	1101	Sherman Dr	Utica	NY
5	UTICA COLLEGE OF SYRACUSE UNIVERSITY	1600	Burrstone Rd	Utica	NY
5	SUNY INSTITUTE OF TECHNOLOGY AT UTICA-ROME			Utica	NY
5	UTICA SCHOOL OF COMMERCE	201	Bleecker St	Utica	NY
5	FAXTON-ST LUKE'S HEALTHCARE SCHOOL OF RAD TECH		Champlin Rd	Utica	NY
5	SAINT ELIZABETH MEDICAL CENTER SCH OF RADIOGRAPHY	2215	Genesee St	Utica	NY

5	ST ELIZABETH HOSPITAL SCHOOL OF RADIOLOGY	2209	Genesee St	Utica	NY
5	SAINT ELIZABETH COLLEGE OF NURSING	2215	Genesee St	Utica	NY
5	BUSINESS TRAINING INSTITUTE	200	Genesee St	Utica	NY
5	SENATOR JAMES H. DONOVAN MIDDLE SCHOOL	1701	Noyes St	Utica	NY
5	JOHN F. KENNEDY MIDDLE SCHOOL	500	Deerfield Dr	Utica	NY
5	CHRISTOPHER COLUMBUS ELEMENTARY SCHOOL	930	Armory Rd	Utica	NY
5	KERNAN ELEMENTARY SCHOOL	929	York St	Utica	NY
5	GENERAL HERKIMER ELEMENTARY SCHOOL		Keyes Rd	Utica	NY
5	THOMAS JEFFERSON ELEMENTARY SCHOOL	190	Booth St	Utica	NY
5	ALBANY ELEMENTARY SCHOOL	1151	Albany St	Utica	NY
5	JOHN F. HUGHES ELEMENTARY SCHOOL	24	Prospect St	Utica	NY
5	WATSON WILLIAMS ELEMENTARY SCHOOL	107	Elmwood Pl	Utica	NY
5	HUGH R. JONES ELEMENTARY SCHOOL	2630	Remington Rd.	Utica	NY
5	NOTRE DAME JUNIOR SENIOR	2	Notre Dame Way	Utica	NY
5	THE HOUSE OF THE GOOD SHEPHERD	1550	Champlin Ave	Utica	NY
5	Thomas R. Proctor High School	1203	Hilton Ave	Utica	NY
5	OUR LADY OF LOURDES SCHOOL	11	Barton Ave	Utica	NY
5	ST PETER SCHOOL-UTICA	19	Herkimer Rd	Utica	NY
5	UCP OF UTICA	1020	Mary St	Utica	NY
5	SACRED HEART SCHOOL	1110	Ney Ave	Utica	NY
5	HOLY TRINITY SCHOOL	1214	Lincoln Ave	Utica	NY
5	Utica Public Library	303	Genesee St	Utica	NY
6	Adirondack High School	8181	St Route 294	Boonville	NY
6	BOONVILLE SCHOOL	110	Ford St	Boonville	NY
6	ADIRONDACK MIDDLE SCHOOL	8181	St Route 294	Boonville	NY
6	ERWIN LIBRARY & INSTITUTE		Post & Schuyler St	Boonville	NY
6	Whitesboro High School		Rt. 291	Marcy	NY
6	Marcy Elementary School	9479	Maynard Dr	Marcy	NY
6	ROME HOSPITAL & MURPHY MEM HOSPITAL	1500	N. James St	Rome	NY
6	MOHAWK VALLEY COMMUNITY COLLEGE-ROME BRANCH		Floyd Ave	Rome	NY
6	CENTRAL NEW YORK BIBLE INSTITUTE	5963	Sleepy Hollow Rd	Rome	NY
6	Rome Free Academy	95	Dart Circle	Rome	NY
6	ROME CATHOLIC JR SR HIGH SCHOO	800	Cypress St	Rome	NY
6	ROME COMMUNITY CHRISTIAN SCH	5963	Sleepy Hollow Rd	Rome	NY
6	GEORGE R. STALEY UPPER ELEMENTARY SCHOOL	620	Bloomfield St	Rome	NY
6	LYNDON H. STROUGH MIDDLE SCHOOL	801	Laurel St	Rome	NY
6	LOUIS V DENTI ELEMENTARY SCHOOL	1001	Ruby St	Rome	NY
6	GANSEVOORT ELEMENTARY SCHOOL	758	W. Liberty St	Rome	NY
6	FORT STANWIX ELEMENTARY SCHOOL	110	W. Linden St	Rome	NY
6	STOKES ELEMENTARY SCHOOL	9095	Turin Rd	Rome	NY
6	BELLAMY ELEMENTARY SCHOOL	7118	Brennan Ave	Rome	NY
6	JOHN E JOY ELEMENTARY SCHOOL	8194	Bielby Rd	Rome	NY
6	JERRY C. CLOUGH ELEMENTARY SCHOOL	409	Bell Rd	Rome	NY
6	RIDGE MILLS ELEMENTARY SCHOOL	7841	Rome-Westernville Rd	Rome	NY
6	ST PETER ELEMENTARY SCHOOL	400	Floyd Ave	Rome	NY
6	TRANSFIGURATION SCHOOL	400	S. James St	Rome	NY
6	JERVIS PUBLIC LIBRARY	613	N. Washington St	Rome	NY
7	Hancock Junior-Senior High School	67	Education Lane	Hancock	NY
7	MUSLIM PAROCHIAL SCHOOL	RD1 BOX 28J	Roods Creek Rd	Hancock	NY
7	Hancock Elementary School	206	Wildcat Dr	Hancock	NY
7	LOUISE ADELIA READ MEMORIAL	104	Read St	Hancock	NY
7	BON SECOURS COMMUNITY HOSPITAL	160	E. Main St	Port Jervis	NY
7	Port Jervis Senior High School	10	Rt 209	Port Jervis	NY
7	CALVARY CHRISTIAN SCHOOL	22	Rt 209	Port Jervis	NY
7	ANNA S. KUHL ELEMENTARY SCHOOL	10	Rt 209	Port Jervis	NY

7	PORT JERVIS MIDDLE SCHOOL		118	E. Main St	Port Jervis	NY
7	TRINITY CATHOLIC SCHOOL		44	Ball St	Port Jervis	NY
7	PORT JERVIS FREE LIBRARY		138	Pike St	Port Jervis	NY
7	Forest City Regional Elementary School		100	Susquehanna St	Forest City	PA
7	Forest City Regional High School		100	Susquehanna St	Forest City	PA
8	ALICE HYDE MEMORIAL HOSPITAL		115	Park St	Malone	NY
8	NORTH COUNTRY COMMUNITY COLLEGE-MALONE			College Ave	Malone	NY
8	FRANKLIN ACADEMY HIGH SCHOOL		42	Huskie Lane	Malone	NY
8	MALONE MIDDLE SCHOOL		15	Francis St	Malone	NY
8	DAVIS ELEMENTARY SCHOOL		183	Webster St	Malone	NY
8	FLANDERS ELEMENTARY SCHOOL		524	E. Main St	Malone	NY
8	SAINT JOSEPH'S ELEMENTARY SCHOOL		99	Elm St	Malone	NY
8	HOLY FAMILY SCHOOL		10	Homestead Park	Malone	NY
8	THE WEAD LIBRARY		64	Elm St	Malone	NY
8	CHAMPLAIN VALLEY PHYSICIANS HOSPITAL		100	Beekman St	Plattsburgh	NY
8	SUNY COLLEGE AT PLATTSBURGH				Plattsburgh	NY
8	CLINTON COMMUNITY COLLEGE		136	Clinton Point Dr	Plattsburgh	NY
8	CLINTON-ESSEX-WARREN-WASHINGTON BOCES PRAC NURS				Plattsburgh	NY
8	CVPH MEDICAL CENTER SCHOOL OF RADIOLOGIC TECHN		75	Beekman St	Plattsburgh	NY
8	FLYING NUNNS AVIATION		10A	Airport Rd	Plattsburgh	NY
8	PLATTSBURGH SENIOR HIGH SCHOOL		1	Clifford Drive	Plattsburgh	NY
8	LAKESHORE CHRISTIAN SCHOOL		4635	Route 9	Plattsburgh	NY
8	ARTHUR P. MOMOT ELEMENTARY SCHOOL		60	Monty St	Plattsburgh	NY
8	STAFFORD MIDDLE SCHOOL		15	Broad St	Plattsburgh	NY
8	OAK STREET SCHOOL		108	Oak St	Plattsburgh	NY
8	BAILEY AVENUE SCHOOL		50	Bailey Ave	Plattsburgh	NY
8	ST JOHNS ACADEMY		59	Broad St	Plattsburgh	NY
8	ST PETERS SCHOOL		23	St. Charles St	Plattsburgh	NY
8	OUR LADY OF VICTORY ACADEMY		4917	S. Catherine St	Plattsburgh	NY
8	NEW LIFE CHRISTIAN ACADEMY		164	Prospect Ave	Plattsburgh	NY
8	PLATTSBURGH PUBLIC LIBRARY		19	Oak St	Plattsburgh	NY
8	Dannemora Elementary School		40	Emmons St	Dannemora	NY
8	Dannemora Free Library		1168	Cook St	Dannemora	NY
9	SUNY Oneonta	Oneonta State College	108	Ravine Parkway	Oneonta	NY
9	Hartwick College		1	Hartwick Drive	Oneonta	NY
9	SUNY Cobleskill			Route 7	Cobleskill	NY
9	Bassett Hospital		1	Atwell Road	Cooperstown	NY
9	SUNY Morrisville	Morrisville State College		Eaton Street	Morrisville	NY
9	SUNY Cortland		94	Prospect Terrace	Cortland	NY
9	TOMPKINS-CORTLAND COMMUNITY COLLEGE		170	North Street	Dryden	NY
9	DRYDEN ELEMENTARY SCHOOL		16	Union St	Dryden	NY
9	DRYDEN MIDDLE SCHOOL		118	Freeville Rd	Dryden	NY
9	DRYDEN HIGH SCHOOL		118	Freeville Rd	Dryden	NY
9	THE SOUTHWORTH LIBRARY ASSOCIATION		24	W. Main St	Dryden	NY
9	CORTLAND MEMORIAL HOSPITAL		134	Homer Ave	Cortland	NY
9	CORTLAND JUNIOR-SENIOR HIGH SCHOOL		8	Valley View Dr	Cortland	NY
9	CORTLAND CHRISTIAN ACADEMY		15	West Rd	Cortland	NY
9	FRANKLYN S. BARRY SCHOOL		20	Raymond Ave	Cortland	NY
9	ALTON B. PARKER SCHOOL		89	Madison Ave	Cortland	NY
9	RANDALL SCHOOL		31	Randall St	Cortland	NY
9	F.E. SMITH SCHOOL		33	Wheeler Ave	Cortland	NY
9	VIRGIL ELEMENTARY SCHOOL		1208	Church St	Cortland	NY
9	ST MARY'S SCHOOL		61	N. Main St	Cortland	NY
9	PARK SIDE CHRISTIAN SCHOOL		78	Homer Ave	Cortland	NY
9	FINGERLAKES ADVENTIST SCHOOL		1304	Fisher Ave	Cortland	NY

9	VICTORY CHRISTIAN ACADEMY	2910	Douglas Rd	Cortland	NY
9	CORTLAND FREE LIBRARY	32	Church St	Cortland	NY
9	Cazenovia College			Cazenovia	NY
9	BURTON STREET ELEMENTARY SCHOOL	37	Burton St	Cazenovia	NY
9	CAZENOVIA MIDDLE SCHOOL	31	Emory Ave	Cazenovia	NY
9	CAZENOVIA PUBLIC LIBRARY SOCIETY	100	Albany St	Cazenovia	NY
9	CAZENOVIA HS	31	Emory Ave	Cazenovia	NY
9	SUNY COLLEGE OF AGRIC AND TECHN AT MORRISVILLE			Morrisville	NY
9	MORRISVILLE MIDDLE SCHOOL HIGH SCHOOL	5061	Fearon Rd	Morrisville	NY
9	EDWARD R. ANDREWS ELEMENTARY SCHOOL	55	Eaton St	Morrisville	NY
9	MORRISVILLE LIBRARY	87	E. Main St	Morrisville	NY
9	COMMUNITY MEMORIAL HOSPITAL	150	Broad St	Hamilton	NY
9	COLGATE UNIVERSITY	13	Oak Dr	Hamilton	NY
9	HAMILTON JUNIOR-SENIOR HIGH SCHOOL	47	W. Kendrick Ave	Hamilton	NY
9	HAMILTON ELEMENTARY SCHOOL	47	W. Kendrick Ave	Hamilton	NY
9	NEW LIFE CHRISTIAN SCHOOL	248A	RD2	Hamilton	NY
9	MONTESORI CHILDREN'S HOUSE	56	Utica St	Hamilton	NY
9	Hamilton Public Library	13	Broad St	Hamilton	NY
9	MARY IMOGENE BASSETT HOSPITAL	1	Atwell Rd	Cooperstown	NY
9	Cooperstown Central High School	39	Linden Ave	Cooperstown	NY
9	Cooperstown Elementary School	21	Walnut St	Cooperstown	NY
9	Cooperstown Middle School	39	Linden Ave	Cooperstown	NY
9	Brookwood School			Cooperstown	NY
9	Village Library of Cooperstown	22	Main Street	Cooperstown	NY
9	SUNY COLLEGE OF AGRIC AND TECHN AT COBLESKILL			Cobleskill	NY
9	BASSETT HOSPITAL OF SCHOHARIE COUNTY	178	Grandview Dr	Cobleskill	NY
9	WILLIAM H. GOLDING MIDDLE SCHOOL	193	Golding Dr	Cobleskill	NY
9	GEORGE D. RYDER ELEMENTARY SCHOOL	143	Golding Dr	Cobleskill	NY
9	WILLIAM H. GOLDING ES	177	Golding Dr	Cobleskill	NY
9	THE COMMUNITY LIBRARY	5	Union St	Cobleskill	NY
9	MIDDLEBURGH ELEMENTARY SCHOOL	245	Main Street	Middleburgh	NY
9	MIDDLEBURGH MIDDLE SCHOOL	291	Main Street	Middleburgh	NY
9	MIDDLEBURGH HIGH SCHOOL	291	Main Street	Middleburgh	NY
9	ST MARK'S CHRISTIAN SCHOOL	326	Main Street	Middleburgh	NY
9	MIDDLEBURGH LIBRARY		Main Street	Middleburgh	NY
9	A O FOX MEMORIAL HOSPITAL	1	Norton Ave	Oneonta	NY
9	OTSEGO AREA SCHOOL OF PRACTICAL NURSING	1	Norton Ave	Oneonta	NY
9	ONEONTA MIDDLE SCHOOL	130	East Street	Oneonta	NY
9	GREATER PLAINS ELEMENTARY SCHOOL	60	W. End Ave	Oneonta	NY
9	VALLEYVIEW ELEMENTARY SCHOOL	40	Valleyview St	Oneonta	NY
9	RIVERSIDE ELEMENTARY SCHOOL	29	House St	Oneonta	NY
9	CENTER STREET ELEMENTARY SCHOOL	31	Center St	Oneonta	NY
9	ONEONTA HIGH SCHOOL	130	East Street	Oneonta	NY
9	ONEONTA COMMUNITY CHRISTIAN SC	158	River St	Oneonta	NY
9	ST MARYS ELEMENTARY SCHOOL	38	Walnut St	Oneonta	NY
9	UPSTATE HOMES FOR CHILDREN AND	2705	State Highway 28	Oneonta	NY
9	HUNTINGTON MEMORIAL LIBRARY	62	Chestnut Street	Oneonta	NY



**Atlantic Tele-Network, Inc.**

10 Derby Square  
Salem, MA 01970  
Tel: (978) 619-1300  
Fax: (978) 744-3951

August 14, 2009

Broadband Technology Opportunities Program  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
HCHB 4812  
1401 Constitution Avenue, NW  
Washington, DC 20230

Atlantic Tele-Network, Inc (ATN), of Salem, Massachusetts will readily commit the 20% cash match requirement of the BTOP application under the American Recovery Act and Proposal being submitted by ION Hold Co., LLC, (ION).

ION is majority owned by our subsidiary, Sovernet Holding Corp, out of Bellows Falls, VT., and through that relationship the ATN investment funds would be made available to ION with an intra company loan arrangement at a prevailing market rate and amortization schedule. The use of proceeds from this loan will be predominately for infrastructure construction costs but will also contain some funds for allocation to working capital, project management and oversight.

ATN is happy to provide any supporting documentation required to ensure the availability of these funds for use by ION, should they receive funding through this round or future rounds of the application process.

Should you need anything further at this point, please do not hesitate to contact me.

Thank you,

A handwritten signature in cursive script that reads "Justin Benincasa".

Justin Benincasa  
Chief Financial Officer



Dulles State Office Building • 317 Washington Street, Suite 414 • Watertown, New York 13601 • Telephone (315) 785-2593 • Telefax (315) 785-2591 • TDD (800) 662-1220

**Water and Wastewater Facilities**

Warnack Pump Station  
23557 NYS Route 37  
Watertown, New York 13601

Telephone (315) 782-8661  
Telefax (315) 786-2971  
Emergency Telephone (315) 786-4000

**Open Access Telecom Network**

Dulles State Office Building  
317 Washington Street, Suite 406  
Watertown, New York 13601

Telephone (315) 785-2593  
Telefax (315) 785-2591  
Emergency Telephone (866) 669-3262

**Solid Waste Management Facility**

23400 NYS Route 177  
Rodman, New York 13682

Telephone (315) 232-3236  
Telefax (315) 232-3019

WWW.DANC.ORG

August 14, 2009

Broadband Technology Opportunities Program  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
HCHB 4812  
1401 Constitution Avenue, NW  
Washington, DC 20230

The Development Authority of the North Country, Watertown, NY will provide the 20% cash match requirement for our portion of the BTOP application being submitted by ION Hold Co., LLC, (ION), under the American Reinvestment and Recovery Act.

The Development Authority of the North Country is a New York State public benefit corporation. We will utilize a combination of corporate reserves plus available loan funds to provide the 20% cash match. The use of proceeds from this loan will be predominately for infrastructure construction costs but will also contain some funds for allocation to project management and oversight.

The Development Authority is happy to provide any supporting documentation required to ensure the availability of these funds should ION receive funding through this round or future rounds of the application process.

Should you need anything further at this point, please do not hesitate to contact me.

Very truly yours,



James W. Wright  
Executive Director

JWW/hma