

To: Department of Commerce
National Telecommunications and Information Administration (NTIA)

From: Lane Council of Governments

Subject: Broadband Technology Opportunities Program (BTOP) Extension Request, Oregon South Central Regional Fiber Consortium Lighting the Fiber Middle Mile Project (Award ID: NT10BIX5570032) for Award Period from January 31, 2013 to July 31, 2013

Date: December 18, 2012

To Whom It May Concern:

Lane Council of Governments requests a period of performance extension until July 31, 2013, but not to exceed September 30, 2013, to continue the successful implementation of our Broadband Technology Opportunities Program (BTOP) award. This request includes this project's extension rationale and provides supporting documentation as attachments to the Award Action Request (AAR).

- 1) **Reason(s) for Extension Request:** Lane Council of Governments has experienced circumstances that have caused the need for an extension beyond the original project end date. The narrative below provides an explanation of how the project-specific circumstances resulted in the need for a period of performance extension; our proposed plan for addressing any outstanding issues; and the project benefits that will be delivered during the extension period.

Lane Council of Governments (LCOG) is requesting a no-cost extension to its Round 1 BTOP project. The purpose of the award was to deploy a 110 mile fiber network to connect more than 100 Community Anchor Institutions across the state of Oregon. The project is approximately 80% complete. We are requesting to extend the award period to July 31, 2013 to complete the implementation of the BTOP award. There have been unexpected issues that have impacted the project schedule. Those issues include the following: 1) Environmental and Historic Preservation (EHP) requirements, 2) securing rights of way and pole attachment agreements, 3) weather.

The Environmental Assessment Special Award Condition (EA SAC) took more than a year to resolve. The most important cause for the extended review involved archeological resources and required coordinating an agreement between two Indian tribes, the Oregon SHPO and the Department of Commerce. After initiation, LCOG also experienced compounding delays working with other federal agencies. When LCOG began the project, the Forest Service had a program of granting categorical exemptions for permit requests to cross under highways on Forest Service land. An unrelated suit caused the Forest Service to end all categorical exemptions, requiring an environmental review of LCOG's permit application by the Forest Service. Arrangements with the Bureau of Indian Affairs also took longer than expected.

LCOG also had to negotiate a number of pole attachment agreements and replace a number of utility poles, which took an additional amount of time, but could only be started after the EA was completed.

An earlier and heavier than expected snowfall this Autumn has added an additional delay, so portions of the construction schedule may not be finished by the original January 31, 2013 deadline. The greatest problem this creates is that a portion of the construction is the connection to the final element of the long haul backbone system between Eugene and Klamath Falls. If this connection is not made, the anchor institutions in Klamath County will not be connected to the planned internet access in Eugene. LCOG has also lost more than a month at the end of 2012 because the construction crews used by LCOG, supplied by the Eugene Water and Electric Board (EWEB), spent time in New Jersey assisting with Hurricane Sandy clean-up.

The full benefits of this grant award can be achieved with a no cost extension of six months. Without an extension, LCOG will be forced to stop work on January 31, 2013. We have already held off some of the final construction efforts because we do not want to start a project segment and be half-way through when the funding ends. At that time an estimated ten miles of laterals will not be completed, reducing the total amount of construction from an estimated 104 miles to 94 miles. As mentioned, the snow in Klamath County will also mean that the ring connecting Klamath Falls to Eugene will not be completed. The number of anchor institutions connected to the LCOG fiber system will be reduced from 140 to approximately 110 CAIs connected by the end of the project. Most importantly for the users of the system, LCOG would not be able to install the equipment and supplies that will make connection to the LCOG system practical. This will mean an additional approximately 40 CAIs will be connected to the fiber, but will not receive the level of service originally projected.

9) **Supporting Documentation:** Lane Council of Governments submits the following documentation to assist NTIA with the review of this extension request. The attached materials have been updated according to revised project plans for an extended award period and reflect the narrative provided above.

- **SF-424 Revised Budget**
- **Revised Performance Projections** (justification of all revised project goals provided in above narrative – see table below)

Revised Performance Projections

Performance Indicator	Revised Project Goals
New Network Miles Deployed	104
New Network Miles Leased	354
Existing Network Miles Upgraded	0
Existing Network Miles Leased	0
CAIs Receiving New Access	60
CAIs Receiving Improved Access	80

- **Project Plan (with updated milestones)**

Lane Council of Governments understands that it must continue to comply with all statutory and programmatic requirements and that this is a no-cost period of performance extension request only (i.e., no additional BTOP funding will be provided under this extension request).

Sincerely,

Milo Mecham
Program Manager
Lane Council of Governments

Recipients are encouraged to work with their Federal Program Officer (FPO) prior to submitting the extension request. Upon submission of the extension request and supporting documentation as an AAR, the FPO will forward to the Grants Office. The Grants Office reviews the request and communicates the decision to the recipient.

Category	Total cost	Non-allowable cost	total allowable cost	Remaining expenditure
Administrative and Legal	\$ 39,000	\$ -	\$ 39,000	\$ 1,549
Land, rights of way	\$ 30,000	\$ -	\$ 30,000	\$ 12,000
Relocation	\$ -	\$ -	\$ -	\$ -
Architectural and Engineering	\$ 400,430	\$ -	\$ 400,430	\$ -
Other Engineering	\$ -	\$ -	\$ -	\$ -
Inspection	\$ -	\$ -	\$ -	\$ -
Site work	\$ -	\$ -	\$ -	\$ -
Demolition	\$ -	\$ -	\$ -	\$ -
Construction	\$ 8,390,480	\$ -	\$ 8,390,480	\$ 761,436
Equipment	\$ 1,538,655	\$ -	\$ 1,538,655	\$ 317,235
Miscellaneous	\$ 40,470	\$ -	\$ 40,470	\$ 26,300

Notes

This will be spent on closeout items

This will be spent to gather easements for the Veneta school extension

This construction will be spent on an additional 10 miles of laterals constructed, and an additional 30 CAIs connected

The equipment expenditures for the remaining period will provide optical equipment for an additional 40 CAIs

This will be spent on closeout items, traveling to finalize the inventory. Any leftover funds will be transferred to construction.

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Project Plan (with updated milestones)

The Lane Council of Governments (LCOG) is seeking an extension for its middle mile BTOP project to allow LCOG to complete construction, purchase and deploy all planned equipment and complete an orderly project close out.

The last quarterly report gave the following milestones:

Milestone	Percent complete
2a. Overall Project	75
2b. Environmental Assessment	100
2c. Network Design	100
2d. Rights of Way	95
2e. Construction Permits and Other Approvals	100
2f. Site Preparation	90
2g. Equipment Procurement	70
2h. Network Build (all components - owned, leased IRU, etc	90
2i. Equipment Deployment	40
2j. Network Testing	50

With the extension granted. LCOG proposes the following schedule

Environmental assessment completed by December 31, 2012

Network Design, including recently added routes completed by January 31, 2013

Rights of way completed by March 31, 2013

Site preparation, including new routes, completed by February 28, 2013

Equipment procurement. 80 percent completed by December 31, 2012; 90 percent completed by March 31, 2013, 100 percent completed by May 30, 2013.

Construction of an estimated 110 miles of fiber 90 percent completed by December 31, 2013.

Construction 95 percent completed by March 31. Construction 100 percent completed by May 31, 2013.

Equipment deployment 50 percent complete by December 31, 2012, eighty percent complete by March 31, 2013, 95 percent complete by June 30, 2013, 100 percent complete by July 31, 2013.

This would change the table set forth above as follows:

Milestone	Percent complete			
	December 31	March 31	June 30	July 31
2a. Overall Project	75	85	90	100
2b. Environmental Assessment		100	100	100
2c. Network Design	95	100	100	100
2d. Rights of Way	95	100	100	100
2e. Construction Permits and Other Approvals	95	100	100	100
2f. Site Preparation	90	100	100	100
2g. Equipment Procurement	80	90	100	100
2h. Network Build (all components - owned, leased IRU, etc	90	95	100	100
2i. Equipment Deployment	50	80	95	100
2j. Network Testing	50	90	100	100