

Northeast Nebraska Telephone Company - Polk County – Attachment Letter J

As a community-based broadband service provider, Northeast Nebraska Telephone Company's (NNTC) success is integrally tied to the well-being and success of all residents within its service area, as such NNTC is committed to assuring that all individuals in the project area have access to comparable high-speed internet and the necessary knowledge and skills to use available digital technologies as a means of improving their life circumstances.

NNTC also understands the crucial need to address both the Internet access affordability issues and digital literacy concerns that prevent many lower-income individuals and families from subscribing to and using available broadband to their full benefit.

The COVID-19 pandemic put an additional and disproportionate strain on residents lacking access to reliable, high-speed broadband service. The pandemic drove almost all commercial, educational, healthcare, religious and social activities online and made the internet an ever more crucial link to the essential things that people need. Further, the negative impacts associated with COVID-19 and a lack of broadband availability and affordability were especially harsh with respect to lower income individuals and families. In today's world, neither the above referenced disproportionate impacts caused by the pandemic nor broader poverty concerns can be addressed in a satisfactory way absent the availability of higher broadband service speeds and an advanced, readily scalable broadband network platform.

With respect to the proposed project area, it should be noted that U.S. Census statistics, as of 2022, indicates that the median household income for households in Polk County is lower than that of the median household income for the State of Nebraska as a whole (5.6% less). The percentage of persons living in poverty in Polk County is just above the state's average, 12.6% in Polk County versus the state's rate of 11.2%, in 2022.

Although "Income and Poverty" statistics are not specific to the more limited proposed project area they do suggest that maintaining affordability in the proposed project area is a relevant and significant concern. U.S. Treasury "Guidance" for the Coronavirus Capital Projects Fund puts an emphasis on efforts to address broadband service affordability for those customers who without some financial assistance may not otherwise be able to subscribe to the services available. The NPSC CPF Grant Program requirements more specifically require that "all applicants must demonstrate that they are participating or will participate in the FCC's Affordable Connectivity Program (ACP), or any subsequent subsidy program(s) identified by Treasury, once a grant funded project is deployed." NNTC exists as a regulated "incumbent local exchange carrier" and an "Eligible Telecommunications Carrier"(ETC) under both state and federal law and as such already participates in the federal Affordable Connectivity Program and the federal Lifeline Program (currently offering ACP discounts to 35 (2 tribal) of its existing broadband subscribers and Lifeline Program discounts to a 53 subscribers (2 tribal). If NNTC requested CPF grant is awarded and NNTC can extend its broadband services to the project area, it would also offer existing ACP and Lifeline benefits to all qualifying lower income subscribers and communicate the opportunities to all subscribers in English and Spanish.

It should also be noted that NNTC is committed to efforts that will best inform and assist eligible low-income consumers of broadband service discounts so that they may take full advantage of any monthly discounts available under the FCC's ACP and/or "Lifeline Programs", or other federal or state programs aimed at making essential broadband services more affordable." With respect to the ACP program, NNTC has already taken specific steps enabling wide-spread use of that discount program by its existing eligible broadband consumers. Both opportunities are listed as individual discount opportunities in the main dropdown menu on our website's homepage. We've also included these opportunities with links to the FCC's website in an online survey which was received via postcard to nearly all residents of the proposed area in Polk County.

NNTC recognizes and is committed to ensuring that its Internet and Voice services offered in the project area always remain affordable to all locations within the project area. If NNTC's CPF grant is awarded, when offering its broadband services to customers in the area served by NNTC, will offer both ACP and Lifeline benefits to all qualifying lower income subscribers. In addition, as it does within its existing service area, NNTC will continue to offer a good internet service option designed to fit diverse customer needs and circumstances, including lower priced options which, in accordance with the federal CPF guidelines, "are sufficient for a household with multiple users to simultaneously telework and engage in remote learning."

NNTC will offer the following 100/100 Mbps plan to low-income consumers in addition to the availability of Lifeline and ACP discounts.

Many people are without internet access and the devices that gain them entry to that which an online presence provides. Today, the consequences of being excluded were painfully exposed during the COVID-19 pandemic.

A recent NTCA – Rural Broadband Association "Foundation for Rural Service" (FRS) White Paper which examines more generally the importance of broadband in meeting nation-wide challenges properly notes that "while [broadband] capabilities are certainly important across all sectors, they are especially critical in the broader conversation about quality of life in rural America. Challenges associated with healthcare, education, poverty, access to services, economic opportunities and more are often exacerbated in rural settings due to factors such as geography (low population density, difficult terrain for building infrastructure, distance from medical facilities and other critical services, etc.)"

NNTC is a proud member of the NTCA and FRS and we believe that bringing a higher capacity and more resilient broadband infrastructure is a mission critical first step to successfully address remote learning, remote work and telehealth needs for all individuals residing in the project area.

Remote Learning:

During the pandemic, students without internet subscriptions were placed at a severe and structural disadvantage in keeping up with their peers who had such access. Educators fear that the degree of learning loss among those students without sufficient or reliable internet access may have set them back irrevocably.

During the COVID-19 pandemic public schools serving residents within or near the proposed project area relied extensively on continuing daily classes through the use of online interactive video platforms like “Zoom” and using other online tools and email correspondence to provide assignments, communicate with their students collectively or individually, and continue progression through their various classes and planned grade curriculums. An inability to access the internet in the home or at any nearby location for purposes of participating in online classes and completing school assignments has been and continues to be particularly distressing, depriving their children of essential educational opportunities and putting them at risk of falling behind in advancing both their near-term and long-term educational goals.

As indicated in the FRS White Paper referenced earlier, “pandemic revealed the critical nature of broadband when response efforts sent millions of students and employees home to continue their education and work. . . . Never before has reliable access to high-speed internet been as important as it has been during the COVID-19 pandemic.” While schools within the project area have resumed in-person instruction, the essential nature of internet access as it relates to continuing education for both children and adults cannot be understated. Students and teachers having sufficient and reliable internet access is needed not only for interactive video instruction, but for correspondence between teachers and students regarding school assignments, assistance with homework assignments, online research, educational reference materials and software applications, etc.

The internet or “[d]igital access” available to students for attending class remotely or otherwise being able to engage in online learning may also vary significantly depending on access to usable computer devices within the household. Families with lower income or lower levels of educational attainment are also less likely to have a computer, tablet or other devices that may be necessary to access and fully utilize online learning platforms.

Telehealth:

Various medical hospitals and clinics are located within or in proximity to the project area. These medical provider facilities like other health care providers throughout the U.S., have substantially increased the use of telehealth in their operations, making the availability of a good broadband connection for patient video conferencing appointments with doctors and nurses critically important.

All of these medical facilities offered during the pandemic and continue not only telehealth services including services such as virtual two-way video appointments with physicians, physicians assistants and nurses, telehealth counseling for both physical and mental health, at-home dialysis, and online portal access, etc. All these telehealth services/applications are dependent on a reliable home broadband connection.

Remote Work and other Work Related Broadband Needs:

There is one “critical community facility” within the proposed project area, a Pre-K – 12 school with 366 students. There is not a county courthouse, medical clinic or hospital within the proposed project area. These essential community facilities are located outside the project, a fair distance from many of the area residents and businesses.

The remoteness of the project area locations underscores the importance of the affected residents and businesses having access to high-speed broadband for virtually accessing online information and applications for their work, education, health or other personal needs (such as those used for video conferencing, distance learning, email correspondence, file or content sharing, telehealth, remote work, remote banking, precision agricultural applications, and buying or selling goods or services, etc.).

The critical need for reliable, high-speed broadband services is most evident when considering the farm and livestock locations operating in the proposed project area. High-performance broadband is a must have technology for modern agriculture and critical for farmers in their efforts to successfully manage and operate their businesses, the same as it is for small businesses in urban and suburban America. High speed broadband access is central to farm business sustainability. Today’s farmers rely on a broadband connection for many different farm office/operations center tasks and for using many “precision agriculture,” Internet of Things (IOT) technologies tailored to their individual crop and/or livestock operations as a means of maximizing production, increasing efficiencies, and reducing costs. This includes using broadband connectivity for: payroll; banking transactions and reporting; recordkeeping; accessing online information for making production and input decisions; participating in remote training sessions; USDA and state level reporting; following commodity markets; gaining access to new markets; communicating with customers; ensuring regulatory compliance; uploading and reviewing weather data; raw IOT sensor data; smart crop and livestock monitoring; drone farming; operating autonomous farm machinery; etc. “It takes reliable and high-speed internet access to utilize these [many] tools, to store the data and to leverage [the] information that available to make informed decisions.” “Improved Rural Broadband would increase Crop Yields, Farm Profits,” published by the U.S. Farmers and Ranchers Organization, June 14, 2021, found at: <https://usfarmersandranchers.org/stories/economic-sustainability/improved-rural-broadband-would-increase-crop-yields-farm-profits/>. Relative to the broadband services needed, more specifically, a study published by the Benton Institute for Broadband and Society, “Broadband Solutions for the Farm Office, Field, and Community” at

<https://www.benton.org/publications/future-american-farming> notes that “[n]etworks need to be scalable to continue to meet future needs as new applications for precision agriculture develop. The bandwidth required to support precision agriculture technology has increased exponentially, and that growth will continue.” Accordingly, the study finds that “[f]iber-based broadband technology is best suited to meet the increasing demands of farmers.

The shift to telework has worked well for those who have jobs that could quickly adjust by going remote but not so for those working in service industry, health care, home care, retail and delivery drives unable to avoid leaving their homes for work performance. A full economic recovery from the pandemic requires broadband not only for remote work, but also as a means of assuring that everyone has access to markets and services from their home and they need broadband and affordable internet access to do so.

Planned actions to increase digital literacy and inclusion:

NNTC will also, in addition to increasing awareness of the federal ACP and Lifeline broadband services discount programs, through its community involvement, marketing efforts, website content and other subscriber communications will work toward improving the digital technology knowledge and skills of residents throughout the proposed projects area. This will include a focus on informed of other resources and tools that may be best suited to improving the digital knowledge and skills of its subscribers, including for example instruction to subscribers in the following areas: assisting subscribers in understanding the basics of being connected to broadband and troubleshooting home Wi-Fi issues through our company provided router.

NNTC has contacted the following community leaders:

1. Polk County Commissioner and Chairman Jerry Westring was mailed a letter and the community feedback form, along with a self-addressed stamped envelope. NNTC’s GM Pat McElroy called Jerry on Wednesday, January 10th, regarding NNTC’s grant proposal.
2. Polk County Commissioner Mike Boss was mailed a letter and the community feedback form, along with a self-addressed stamped envelope. NNTC’s GM Pat McElroy called Mike on Wednesday, January 10th, regarding NNTC’s grant proposal and left a message. After a return call, Mike and Pat discussed the project and Mike was in favor of having fiber in the area.
3. Polk County Commissioner Ron Boruch was mailed a letter and the community feedback form, along with a self-addressed stamped envelope. NNTC’s GM Pat McElroy called Ron on Wednesday, January 10th, regarding NNTC’s grant proposal and left a message. After a return call and conversation, Ron was in favor of a fiber build in this area.
4. Polk County Rural Public Power District GM, Barb Fowler was mailed a letter and the community feedback form, along with a self-addressed stamped envelope. NNTC’s GM Pat McElroy called Barb on Wednesday, January 10th, regarding NNTC’s grant proposal and left a message. After a return call, Pat discussed the project with Barb. Barb is in favor of the fiber build because of the poor internet

- connection at the rural power hub site. Barb said she'd be happy to send in the community feedback form to the PSC.
5. Polk County Rural Public Power District Board Member and resident of the proposed area, Ryan Twogood was mailed a letter and the community feedback form, along with a self-addressed stamped envelope. NNTC's GM Pat McElroy called Ryan Wednesday, January 10th, regarding NNTC's grant proposal and left a message. NNTC's Marketing Manager Melissa Lanzourakis visited with Twogood at his residence on Friday, January 5th regarding his current internet experience and asked Twogood to perform a speed test, which is shown in attachment M.

Copies of these 5 letters may be found in Attachment Letter G_3.

NNTC has also sent online surveys via a mailed postcard to homeowners, renters and business owners regarding their current internet experience and their thoughts on fiber internet being brought to their area. In Attachment Letter G_4, please find a copy of the postcard sent to those in this proposed service area, along with returned surveys from the residents. Surveys did provide information with links to the Lifeline Program, the Affordable Connectivity Program and Nebraska Relay.