



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TECHNOLOGY, MANAGEMENT & BUDGET
LANSING

MICHELLE LANG
ACTING DIRECTOR

Connecting Michigan Communities 3.0 Grant Comment and Objection Instructions

Please read through the entire Connecting Michigan Communities Grant Comment and Objection Instructions document before you begin to respond to the questions. This will help ensure you understand the full scope of the process as well as the details you will need to provide to complete the form.

Submission Deadline: All grant comments and objections are due by 4:00 PM EST, on Monday, April 11, 2022.

Submission Guidelines: Completed Comment and Objection Form(s) and supporting documentation must be received by the Department of Technology, Management, and Budget (DTMB), Center for Shared Solutions by 4:00 PM EST on Monday, April 11, 2022, to be considered. Anyone interested in submitting a comment or objection is required to email their completed form and all attachments to DTMB-CMICGrant@michigan.gov. Submitters will receive an email confirmation in receipt of their submission. It is the Submitters' responsibility to ensure their submission is received by DTMB prior to the submission deadline. Submissions sent to the wrong email address or received after the deadline will be rejected. Official submission date and time will be determined by the time stamp accompanying the email. Submissions dated and time stamped in any other way will be rejected. If a confirmation receipt is not received within two business days, Submitters must contact the CMIC Grant Program Office at (517) 335-3727.

Confidentiality: Any materials submitted to DTMB as part of a comment or objection are subject to public disclosure via Freedom of Information Act requests.

Questions and Contact: If you have questions after reviewing the Comment and Objection Instructions, please see the Frequently Asked Questions (FAQ) document available on the grant website at: www.michigan.gov/CMICGrant. The FAQ will be updated throughout the comment and objection process. Questions and comments can also be submitted via email to: DTMB-CMICGrant@michigan.gov.

OVERVIEW

1. Preliminary grant recommendations will be made by the department following the application period.
2. Within 30 days of the preliminary recommendations being made, the department will publish on the grant website www.michigan.gov/CMICGrant the grant applications, redacted according to Section 14 of the Freedom of Information Act, 1976 PA 442, MCL 15.244, the proposed geographic broadband service area, and the proposed broadband service speeds for each application that receives a preliminary recommendation.
3. The department shall establish a period of at least 60 days from the date the award recommendations are published on the department's website, during which time the department will accept comments or objections concerning each application.
4. The department shall consider all comments or objections received in deciding whether an applicant is eligible for a grant. The department shall not award a grant to an applicant if verifiable information is made available that shows any of the following:
 - 4.1. The proposed project includes an area where at least one provider had deployed broadband service.
 - 4.2. The proposed project includes an area where construction of a network to provide broadband service is underway, and the construction is scheduled to be completed within one year of the date of the application.
 - 4.3. The proposed project includes an area where the construction of a network to provide broadband service is planned and is to be completed no later than two years after the date of an application.
 - 4.4. The proposed project includes a specific geographical area where an internet service provider has been selected to receive, provisionally or otherwise, funding by the Federal Communications Commission (FCC) or the United States Department of Agriculture (USDA) specifically for the expansion of broadband services. This subparagraph does not apply to an area once either of the following has occurred:
 - 4.4.1. The Internet Service Provider does not complete the requirements for obtaining the funding described in this subparagraph.
 - 4.4.2. The time period for the internet service provider to meet its obligation described in this subparagraph has expired and the area remains unserved.
 - 4.5. A location is determined to be "served" if broadband service of at least 25 Mbps download and 3 Mbps upload can be deployed to a location within 10 business days of a request for service being made to the provider without any additional construction cost to the customer.
 - 4.6. If an objection submitted by a provider is determined to contain information that results in an investigation and the objection is found to be inaccurate, the Objector is ineligible to receive a grant under this act the next time grants are issued after filing that false statement.

COMMENT OR OBJECTION SUBMISSION PROCESS

1. Anyone that wishes to file a comment or objection to a preliminary grant recommendation must complete the Comment or Objection Form available on the grant website www.michigan.gov/CMICGrant.
2. All completed Comment and Objection Form(s) and supporting documentation must be submitted between 8:00 AM EST, on Friday, February 11, 2022, and no later than 4:00 PM EST, on Monday, April 11, 2022. Anyone interested in submitting a comment or objection is required to email their completed form and all attachments to DTMB-CMICGrant@michigan.gov. Submitters must complete the appropriate sections of the Comment and Objection Form and clearly label any attachments with the question/statement number from the form. Those submitting a comment or objection will receive a confirmation receipt via email. It is the Submitters' responsibility to ensure their submission is received by DTMB prior to the submission deadline. Submissions sent to the wrong email address or received after the deadline will be rejected. Official submission date and time will be determined by the time stamp accompanying the email. Submissions dated and time stamped in any other way will be rejected. If a confirmation receipt is not received within two business days, Submitters must contact the CMIC Grant Program Office at (517) 335-3727.
3. Any materials submitted to DTMB as part of a comment or objection are subject to public disclosure via Freedom of Information Act requests.
4. Format
 - 4.1. The comment/objection must be typed using the fillable .pdf forms available on the grant website www.michigan.gov/CMICGrant. A handwritten comment/objection will not be accepted.
 - 4.2. The comment/objection form must be submitted following the designated file naming structure. Commenters/objectors are to include their name or the name of their organization followed by the phrase, "Comment," for those submitting a narrative comment (e.g. ABCTelecom_Comment.pdf), and "Objection" for those submitting an objection, (e.g. ABCTelecom_Objection.pdf).
 - 4.3. Attachments should be submitted following the designated naming structure. Commenters/objectors are to use the name of their organization followed by the attachment number and file type (e.g. ABCTelecom_Attachment_1.xlsx).
5. A commenter/objector may submit a comment or objection for more than one preliminary grant recommendation project, but an individual (separate) and complete comment/objection form must be completed for each comment/objection filed.
6. If you have questions after reviewing the Comment and Objection Instructions and Form, please see the Frequently Asked Questions (FAQ) document available on the grant website at: www.michigan.gov/CMICGrant. The FAQ will be updated throughout the comment and objection process. Questions and comments can also be submitted via email to: DTMB-CMICGrant@michigan.gov.

7. A comment/objection may be filed for the full extent or only a portion of a proposed CMIC grant service area of a preliminary grant recommendation, however, the same level of detail is required of objectors for both full and partial preliminary grant recommendation objections.
8. The department reserves the right, at its sole discretion, to reject an objection if it: 1) is received after the deadline; 2) is incomplete or missing any of the required forms, narrative, or attachments, or 3) does not follow the outlined comment/objection requirements.

COMMENT AND OBJECTION FORM INSTRUCTIONS

Section 1 - Commenter/objector name, company and DBA (if applicable), and mailing address. Commenter/objectors are required to provide a single contact person that will be responsible for all communication for the comment/objection period. A telephone number and email address for this primary contact must also be provided.

Section 2 - Identification numbers (if applicable) including but not limited to, Federal Employer Identification Number (EIN), Michigan Tax Identification Number, Michigan Vendor Identification Number (if applicable), Federal Communications Commission (FCC) registration number (FRN), and Service Provider Identification Number (SPIN). These identification numbers will be used by objection reviewers to establish the credibility of commenters/objectors.

Section 3 - Name of the preliminary CMIC grant recommendation project to which the comment or objection applies.

Section 4 - Indicate whether the submission is a narrative comment or filing an objection to the preliminary CMIC grant recommendation project.

All Narrative Commentors - Complete Section 5 and Signature Page

Section 5 - Complete this section if only making a narrative comment on the proposed CMIC project. Please keep the narrative to 2000 characters or less.

All Objectors – Complete Sections 6-9, Signature Page, and Appropriate Sub-Sections

Section 6 - All Objectors must indicate which type of objection is being made, per the grant enabling legislation, from the following options:

- The proposed CMIC project includes an area that already has broadband service of at least 25/3 Mbps from the objector.
- The proposed CMIC project includes an area where construction of a network to provide broadband service is underway by the objector, and the

construction is scheduled to be completed within one year of the date of the application; or

The proposed CMIC project includes an area where the construction of a network to provide broadband service by the objector is planned and is to be completed no later than two years after the date of an application.

- The proposed CMIC project includes a specific geographical area where an internet service provider has been selected to receive, provisionally or otherwise, funding by the FCC or the USDA specifically for the expansion of broadband services.

Section 7 - All Objectors must indicate whether this objection applies to the entire proposed CMIC grant service area or a portion of the proposed CMIC grant service area.

Section 8 - All Objectors must provide a description of the proposed CMIC grant service area to which the objection applies including whether the objection is for the entire proposed service area or a portion.

Attachment 1 - All Objectors must include a map that includes the proposed CMIC grant service area to which the objection applies. Objectors must attach a .pdf map of the objected area, as well as a GIS-compatible file, (i.e. Shapefile set or .kml/kmz file type). The map of the objected area should also include place names, boundaries, buildings, road/street names, street addresses, or other features that clearly identify the location.

Attachment 2 - All Objectors must attach a spreadsheet file that lists the addresses in the proposed CMIC grant service area included in the objection. The spreadsheet must contain columns with the following headings: number, street name, address, city, state, and zip code, as well as the download/upload speed that is or will be available to the address in Megabits per second (Mbps). See example spreadsheet below.

Incomplete, incorrect addresses, and P.O. Boxes will be discarded from the protest list.

Number	Street	Address	City	State	Zip Code	Speed (Mbps)
123	Sample St.	123 Sample St.	Testtown	MI	48888	25/3
456	Sample St.	456 Sample St.	Testtown	MI	48888	25/3

Section 9 - All Objectors must provide a narrative description to accompany the maps (Attachment 1) and spreadsheet of addresses (Attachment 2).

Existing Service – Only complete this sub-section for objections claiming service is already available in the proposed CMIC grant service area

Attachment 3 - Objectors claiming that service is already available in a geographic area of the proposed CMIC grant service area are required to provide a sworn affidavit from an officer of the internet service provider stating:

- 1) broadband service is currently provided at speeds of at least 25 Mbps download and 3 Mbps upload in the specific geographic area; and
- 2) the provider is able to provide broadband service in the specific geographic area at speeds of at least 25 Mbps download and 3 Mbps upload to a customer not later than 30 days after the customer requests installation of that service and without an extraordinary commitment of resources or construction charges or fees exceeding an ordinary service activation fee. The 30-day time period is extended to 60 days if permits are needed before the broadband service is activated.

Attachment 4 - Fixed and mobile wireless providers filing an objection claiming existing service must include wireless service propagation diagrams showing availability in the proposed CMIC grant service area.

Attachment 5: Objectors claiming that service is already available in the proposed CMIC grant service area are required to provide complete and verifiable evidence of existing service. This evidence may include, but is not limited to, tower lease agreements, pole attachment agreements, as-built engineering diagrams of the network in the proposed service area, or similar. Random speed tests demonstrating the ability to deliver 25/3 Mbps service are required. Each test should have an associated address and date/time the test was conducted.

Section 10 – Objectors must provide a narrative description of the evidence of existing service provided.

Proposed Service – Only complete this sub-section for objections claiming service will be constructed in the proposed CMIC grant service area within two years

Attachment 3 - Objectors claiming that construction of a network is planned or currently underway in a specific geographic area of the proposed CMIC grant service area are required to provide a sworn affidavit from an officer of the internet service provider stating:

- 1) The proposed project includes a specific geographic area where construction of a network to provide broadband service is underway by the objector, and the construction is scheduled to be completed within one

year of the date of the application; or

2) The proposed project includes a specific geographic area where the construction of a network to provide broadband service by the objector is planned and is to be completed no later than two years after the date of an application.

Attachment 4 - Fixed and mobile wireless providers filing an objection claiming proposed service must include wireless service propagation diagrams showing availability in the proposed CMIC grant service area.

Attachment(s) 5 - To facilitate the vetting process of an objection, Objectors are encouraged to provide additional evidence of planned service, including but not limited to examples of financial commitment to the project such as letters of credit (or similar), engineering designs of the network in the proposed service area (or similar), tower lease agreements, pole attachment agreements, feasibility studies, consumer surveys, bills of lading for project materials or other ordering documentation (or similar), description of any local, county, state, environmental, historic, architectural, or archeological permits (or similar) that are needed and have been obtained for the network in the objected area.

Federally Funded Area - Only complete this sub-section for objections claiming the proposed CMIC grant service area has been selected to receive funding by the Federal Communications Commission (FCC) or the United States Department of Agriculture (USDA) specifically for the expansion of broadband services.

Section 12 – Indicate the name of the provider awarded the federal funding exactly as it appears on the federal documentation.

Section 13 – Indicate the name of the specific federal program in which the provider was awarded funding.

Section 14 – Provide web links to FCC or USDA resources where the claim may be verified, press releases, data tables, maps, dockets, orders, or similar.

Attachment 7 – Provide a spreadsheet of the census blocks in the proposed CMIC grant service area that are part of the stated federally funded program. This spreadsheet should include the census block ID number as well as the provider receiving the federal funds for the block and the specific federal program applicable to the census block.

Attachment 3 - Objectors claiming the proposed CMIC grant service area has been selected to receive federal funding are required to provide a sworn affidavit from an officer of the internet service provider stating:

1) The specific geographic area of the proposed CMIC grant service area has been selected to receive, provisionally or otherwise, funding by the

Federal Communications Commission or the United States Department of Agriculture specifically for the expansion of broadband services.

2) The Objector has completed the requirements for obtaining the funding described in this section.

3) The time period for the Objector to meet its obligation described in this section has not expired.

COMMENT AND OBJECTION REVIEW

1. Following the comment and objection period, the department shall review and verify each comment/objection for validity and determine if the objection meets the standards outlined in the grant enabling legislation. This review shall include, but is not limited to, desktop data verification research, on-sight field validation, interviews with interested parties, and discussions with the Michigan Public Service Commission and the FCC.
2. For objections based on mobile broadband service, all areas represented as served (both outdoor and indoor) in the Objector's submission must meet at least 25 Mbps download and 3 Mbps upload at the network's edge, measured from stationary user equipment at three feet from ground level with a 95 percent confidence margin for the network area with a uniform network load of 50 percent for the download and upload.
3. Where an objection has been found to be credible, the department will notify the objector and the grant applicant.
4. DTMB, at its sole discretion, will determine whether an objection is credible. If an objection is found to be credible for the entire project area, no funding will be awarded to that project. If an objection is found to be credible for only a portion of a project, the rest of the project may continue through the review process for possible grant award.



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Comment/Objection Submission Checklist

This checklist is part of your comment/objection and is to be returned along with your completed comment/objection form and attachments.

- Read the entire comment/objection information package.
- Comment/objection form is complete and file name meets the standards.
- Attachments have been gathered and file names meet the standards.
 - Attachment 1: Maps of proposed service area to which the objection applies in .pdf format and GIS compatible files.
 - Attachment 2: Spreadsheet in .xlsx format of addresses in the proposed service area to which the objection applies.
 - Attachment 3: Affidavit of: 1) providing existing service, 2) commitment to offer the proposed service, or 3) receipt of federal funding in the CMIC grant funded service area.
 - Attachment 4: Wireless propagation diagrams (required for fixed and mobile wireless objections).
 - Attachment(s) 5: Additional evidence of existing service (if applicable).
 - Attachment(s) 6: Additional evidence of planned deployment (if applicable).
 - Attachment 7: Spreadsheet in .xlsx format of census blocks in the proposed service area to which the objection applies (if applicable).

Attachments must be submitted following the designated naming structure. Applicants are to use the name of their organization followed by the attachment number and file type (e.g. ABCTelecom_Attachment_1.xlsx).

Commenter/Objector Information:

1) Primary Contact Name:

Company/Organization (if applicable):

Mailing Address:

Primary Contact Phone Number:

Primary Contact Email Address:

2) Commenter/Objector Identification Numbers: Please provide the following identification numbers (if applicable):

Federal Employer Identification Number (EIN):

Michigan Tax Identification Number:

Michigan Vendor Identification Number:

Federal Communications Commission Registration Number (FRN):

3) Project Name to which this Comment or Objection is Related:

4) Is this submission a narrative comment or an objection?

- Narrative Comment
- Objection

Complete Only Section 5 and Signature Page for Narrative Comments:

5) Provide your narrative comment in the space provided below (2000 characters max.).

Complete Sections 6 – 15 and Signature Page for All Objections:

6) Please indicate the type of objection being filed:

- The proposed project includes an area that already has broadband service of at least 25/3 Mbps from the objector.
- The proposed project includes an area where the construction of a network to provide broadband service by the objector is under way or will be completed no later than 2 years after the date of an application.
- The project includes an area that has been selected to receive, provisionally or otherwise, funding by the Federal Communications Commission or the United States Department of Agriculture specifically for the expansion of broadband services.

7) Does this objection apply to the entire proposed service area of the preliminary grant recommendation named above or a portion of the proposed service area?

- Entire Proposed Service Area
- Portion of the Proposed Service Area

8) Provide a brief description of the proposed grant service area to which the objection applies, (2000 characters max.):

Attachment 1: Map of proposed service area to which the objection applies in .pdf format and GIS compatible formats.

Attachment 2: Spreadsheet in .xlsx format of addresses in the proposed service area to which the objection applies.

- 9) Provide a brief narrative to accompany the map and spreadsheet of addresses you have attached to this objection, (2000 characters max.):

Existing Service - Only complete this sub-section for objections claiming service is already available in the proposed grant service area.

Attachment 3: Affidavit of providing existing service in the grant funded service area.

Attachment 4: Wireless propagation diagrams (required for fixed and mobile wireless objections)

Attachment(s) 5: Additional evidence of existing service, including random speed tests demonstrating the ability to deliver 25/3 Mbps service.

- 10) Provide a description to accompany attached evidence of existing service and wireless propagation diagrams (if applicable), (4000 characters max.):

Proposed Service - Only complete this sub -section for objections claiming service will be constructed in the proposed service area within two years.

Attachment 3: Affidavit of commitment to offer the proposed service in the grant funded service area.

Attachment 4: Wireless propagation diagrams (required for fixed and mobile wireless objections)

Attachment(s) 6: Additional evidence of planned deployment

- 11) Provide a description to accompany the attached additional evidence of planned deployment supplied, (4000 characters max.):

Federally Funded Area - Only complete this sub-section for objections claiming the proposed service area has been selected to receive funding by the FCC or the USDA specifically for the expansion of broadband services.

Attachment 3: Affidavit the Objector has received federal funding to extend broadband service into the proposed service area to which the objection applies.

Attachment 7: Spreadsheet in .xlsx format of the census blocks to which the objection applies.

- 12) Name of the Provider awarded funding:

- 13) Name of the specific federal program in which the Provider was awarded funding:

- 14) Links to resources verifying the claim:

Signature Page:

I acknowledge:

1. Any materials submitted to DTMB as part of a comment or objection are subject to public disclosure via Freedom of Information Act requests.
2. If an objection submitted is determined to contain information that results in an investigation and the objection is found to be inaccurate, the objector is ineligible to receive a grant under this act the next time grants are issued after filing that false statement.
3. If a grant award recommendation is rejected because the proposed project includes an area where the construction of a network to provide broadband service by the objector is to be completed no later than two years from the date of the original grant application, the internet service provider installing the broadband service in lieu of the grant award recommended applicant shall provide notice to the department when the construction of the broadband service is completed. If no notice is received, the objector is ineligible to receive a grant under this act the next time grants are issued after filing that false statement.

By way of signature, I affirm the information provided is true, complete and accurate to the best of my knowledge.

[Signature]

[Date]

[Printed Name]

[Title]

[Company]