

Clinton County

Applicant

FOR OFFICE USE ONLY:

Version # _____

APP # 230151

Applicant Information

- a. Applicant Name Frontier North Inc.
- b. Does Business as
- c. Address 401 Merritt 7
- d. Address 2
- e. City Norwalk State CT Zip 06851
- f. Federal ID Number 35-1869961 DUNS Number Unique Entity Id. KNWSWV596 MB5
- g. Agency Type
- Licensed under the Michigan Telecommunications Act (1991 PA 179, MCL484.2101 to 484.2603)
- Franchise holder under the Uniform Video Services Local Franchise Act(2006 PA 480, MCL 484.3301 to 484.3315)
- Broadband Service Provider currently providing service in Michigan
- Public private-partnership between a governmental entity and an internet service provider
- Private, Non-Profit

As an applicant to the ROBIN Program I certify that I have read and understand the ROBIN Program Guidance and any linked or accompanying information in its entirety and understand the program guidelines, restrictions, reporting, compliance, and regulations.

- Agree Disagree

Please provide additional details on how you are eligible for this program

Frontier is eligible for the ROBIN grant as a holder of a license under the Michigan Telecommunications Act, 1991 PA 179.MCL 484.2101 to 484.2603. In addition, Frontier is current providing broadband service in Michigan. Attached is a copy of Frontier's state-issued license and Frontier's currently available broadband services in Michigan are reflected at www.Frontier.com.

Please provide evidence of eligibility [433__Frontier_MI License_Frontier North Inc.pdf](#)

Are you registered with the Michigan Public Service Commission's Intrastate Telecommunications Service Providers Registry (ITSP)?

- Yes No Unsure

Have you provided broadband availability data to the Federal Communications Commission within the last two years?

- Yes No Unsure

Applicant Identification Numbers: Please provide the following identification numbers for the applicant (if available):

Michigan Tax Identification Number: 35-1869961

Michigan Vendor Identification Number (SIGMA ID): Forthcoming

Federal Communications Commission Registration Number (FRN): 0004350237

Service Provider Identification Number (SPIN): 143004789

Project Information

- a. Project Name Clinton County
- b. Is implementing agency same As Applicant Yes No

Facesheet for Realizing Opportunities with Broadband Infrastructure Networks Grant - 2023
Agency: Frontier North Inc.
Application: Clinton County

c. Implementing Agency Name			
d. Project Start Date	Sep-01-2023	End Date	Aug-30-2025
e. Amount of Funds Requested	\$16,370,190.87	Project Cost	\$27,746,086.21

Facesheet for Realizing Opportunities with Broadband Infrastructure Networks Grant - 2023
 Agency: Frontier North Inc.
 Application: Clinton County

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Contacts

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c. Financial Officer

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d. Primary Grant Contact

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 E-mail Address diane.williams-stinson@ftr.com

Project Overview

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APP # 230151

Project Overview

Please provide a Project Summary not exceeding 250 words

Frontier North, Inc. ("Frontier") is partnering with Clinton County to bring 5 Gigabit symmetrical (5000 Mbps/5000 Mbps) Fiber-to-the-Premises ("FTTP") services to 3,604 unserved and underserved locations within Clinton County. The Project requires \$27,746,086.21 in funding for the grant eligible locations. We request a grant of \$16,370,190.87 to connect grant eligible locations. Frontier and the Town will jointly fund all other costs according to the terms of their formal Public Private Partnership Agreement. As a complement to this Project, Frontier intends to, in partnership with the County, extend fiber to thousands of additional locations in the County to ensure broader availability of ultra-high-speed fiber broadband services to residences, businesses, and community anchor institutions in the community.

This application includes locations serviced by Point Broadband and CMS using fixed wireless technology and erroneously designated as "served" in recently released MIHI maps. Based on the County's feedback from residents and its own investigation (including attempts to order service), 100/20 Mbps service is not available at these locations. Furthermore, where deployed in Clinton County, this technology is subject to significant capacity and reach limitations such that residents subscribing to fixed wireless service are not able to achieve speeds consistently. Accordingly, these locations are improperly designated as served and should be deemed grant-eligible.

Please briefly describe why this project needs funding from the ROBIN Grant Program and why the project could not proceed without this funding. (250 words max.):

The grant eligible locations included in this Project are high-cost and deploying fiber to them in the absence of a contribution of public funding would be economically prohibitive. As demonstrated in the Budget Section, Project cash flow would be inadequate to sustain the Project and service future customers without the requested funding. As a result, without grant funding from the state, the Project Area would likely be bypassed.

If this Project is funded, Frontier intends to privately fund fiber expansion to significantly more locations within the County that complements the expansion of fiber to grant-eligible locations. As a result, symmetrical gigabit fiber will be more broadly available in and around the Project area. By leveraging the complementary independently financed expansion, Frontier is able to bring economies of scale to the funding request for grant-eligible locations. Specifically, the broader project approach allows Frontier to distribute fixed equipment and fiber deployment costs from the central office to the grant-eligible areas across significantly more customer locations and thereby reduce the funding requested versus a standalone grant-eligible-only project. In addition, this approach reduces the overall payback period of the grant-eligible project due to inclusion of the more profitable locations in its overall economic analysis.

Is the proposed project a last-mile or middle-mile infrastructure proposal as defined in the ROBIN Grant Program Guidance?

- Last-Mile
 Middle-Mile

Project Service Delivery

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Proposed Service Area Information

PLEASE READ THE FOLLOWING CAREFULLY

ENTER INFORMATION IN THIS SECTION ONLY IF YOU SELECTED 'LAST-MILE' AS A PROJECT TYPE

Please provide a brief description of the proposed service area (250 words max.):

Frontier and Clinton County's Project Area includes grant-eligible locations in and around communities across Clinton County. Of these 3,604 locations, 688 are currently without broadband service of at least 25 Mbps download and 3 Mbps upload (unserved) and 2,916 do not have broadband service of at least 100 Mbps download and 20 Mbps upload (underserved). There are locations serviced by Point Broadband and CMS Internet (481 locations) using fixed wireless technology included in these totals that are erroneously reported as served and should be deemed grant-eligible. Included in the attached PDF map file are a sample of screenshots from Point Broadband's website showing 100/20 Mbps service is not available.

After Project completion, these locations will have access to 5 Gbps symmetrical service.

Please upload a PDF overview map of proposed service area

[436_Frontier_Clinton_County_Maps and Screenshots.pdf](#)

Proposed infrastructure to be deployed including route locations

Please upload a GIS-compatible file(s) of the proposed infrastructure to be deployed including route locations and other supportive infrastructure to be deployed as a result of the grant. This file(s) should contain the actual proposed locations of infrastructure to be deployed including, but not limited to: fiber transport, fiber to the premise, coaxial, or other similar network routes, cabinets, nodes, pedestals, splice enclosures, towers, huts, etc.

Acceptable file types: ESRI Geodatabase (.gdb), ESRI Shapefile (.shp, .shx, .dbf, .sbn or .sbx, .fbn or .fbx, .ain or .aih, .atx, .ixs, .mxs, .prj, and .xml), Google Earth files (.kml or .kmz).

Please refer to the Application guidance to view an example of the output from such a GIS-compatible file

Name	Attachment
Frontier_Clinton_County_KML Mapping	437_0_Frontier_Clinton_County_KML Mapping.kml

Spreadsheet of street addresses

Please upload a spreadsheet of street addresses/locations within the proposed service area. Spreadsheet should include full address string (number, street, city, state, zip), location type (residential, business, institution, other), latitude and longitude (if available), and whether the address is currently unserved at 25/3 Mbps or 100/20 Mbps or unknown.

[278_Frontier_Clinton_County_AddressList.xls](#)

Locations by Type

Locations Passed: Please indicate the total number of locations by type that will be able to receive improved broadband services as a result of the proposed project:

Type	Locations
Households	3,571

Businesses	29
Community Anchor Institutions	4
Total Locations Passed	3,604

Please list the jurisdictions impacted by the proposed service area:

City(ies)/Village(s): Fowler

Township(s): Bath Charter, Bengal, Dallas, Duplain, Eagle, Essex, Greenbush, Lebanon, Olive, Riley, Victor, Westphalia

County(ies):

Clinton

State House District(s):

State House District 93

State Senate District(s):

State Senate District 24

Description of the broadband service to be provided

Does the proposed service area include (wholly or partially) a Qualified Opportunity Zone? Yes No

If yes, please list the Census Tract numbers for the impacted Qualified Opportunity Zones

Please provide a brief description of the broadband service to be provided including, but not limited to, the technology to be used, will bandwidth be dedicated or shared, etc. (250 words max.):

Frontier and Clinton County propose to deploy an FTTP network that offers symmetrical 5 Gbps broadband. The bandwidth offered by this network is dedicated, and will use xPON - Gigabit Passive Optical Network ("GPON") (ITU-T G.984), XGS-PON (ITU-T G.9807.1). Frontier has experience deploying and operating xPON architecture across its footprint. Its best-in-class network technology currently provides symmetrical 5 Gbps with <100 ms latency. xPON technology is capable of supporting 10, 25 and 50 Gbps speeds and Frontier is testing these speeds in preparation for deployment as market demand and customer premises equipment materialize in future years. As reflected by the publicly-available results of the FCC's Measuring Broadband America Program, xPON technologies readily meet speed and latency requirements. Frontier and Clinton County have proposed this network because fiber is the technology that supports the highest speed tiers available today and is the most scalable, best-in-class broadband infrastructure designed for ever-increasing application needs, higher quality demands, and lower response/latency demands for increasingly sophisticated and interactive applications. Frontier has demonstrated its ability to readily scale capacity. On January 30, 2023, Frontier was the first provider in the nation to introduce 5 Gbps symmetrical residential service throughout its entire fiber network, having also been the first to similarly launch 2 Gbps service in 2022.

Minimum Mbps

Are you able to provide the minimum 100/100 Mbps required service speed to all locations identified in the proposed service area? Yes No

If No, the ROBIN Program allows for a minimum service speed of 100/20 Mbps in cases of extreme geographical, topographical, or financial impracticability of delivering 100/100 Mbps. Such connections must be scalable to 100/100 Mbps. Applicants must provide substantial evidence as to the impracticability of delivering 100/100 Mbps and the justification for providing a connection speed of 100/20 Mbps instead.

Affordability and Service Limitations

Using the table, please indicate the download and upload speeds of the services to be offered in the proposed service area, the non-discounted or rack rate monthly pricing of unbundled internet-only service should be included for each service offered, as well as the monthly data allowance for customers (if applicable). Applicants must certify their commitment to providing the proposed level of service and cost for at least one (1) year after grant closeout. After this period, grantees are expected to maintain pricing and speed levels for the ROBIN project area consistent with those found in the grantee's non-ROBIN service areas elsewhere in the state.

Download Speed (Mbps)	Upload Speed (Mbps)	Monthly Cost \$	Monthly Data Allowance (GB)
500	500	59.99	N/A
1,000	1,000	79.99	N/A
2,000	2,000	109.99	N/A
5,000	5,000	164.99	N/A

Affidavit of commitment

[442_Frontier_Certification of Service and Rate Commitment.pdf](#)

FCC's Affordable Connectivity Program (ACP)

Do you participant in the FCC's Affordable Connectivity Program (ACP)? Yes No

If No, applicant must participate in ACP within 6 months of receiving a ROBIN grant award. Please attach evidence that they are pursuing ACP participation.

Do you provide a low-cost service offering in conjunction with the ACP that provides ACP eligible households with a net \$0 monthly cost of service? Yes No

If yes, please describe the low-cost service offering.

Frontier offers qualified low-income households affordable internet services and does so through participation in the Federal Affordable Connectivity Program (ACP). ACP is a non-transferable (from one person to another) government assistance program that provides a discount on the cost of broadband internet access service. Once a household's ACP eligibility has been established, they may sign up for one of Frontier's low-income product offerings. Frontier service plans currently available to ACP qualified customers include the following:

- Fiber 100*: \$0.00 per month (\$29.99 with a \$29.99 ACP credit)
- Fiber 500*: \$14.99 per month (\$44.99 with a \$30.00 ACP credit)
- Fiber 1 Gig*: \$34.99 per month (\$64.99 with a \$30.00 ACP credit)
- Fiber 2 Gig*: \$ 69.99 per month (\$99.99 with a \$30.00 ACP credit)
- Fiber 5 Gig*: \$124.99 per month (\$154.99 with a \$30.00 ACP credit)

* All speeds are symmetrical.

In addition, Frontier participates in the Federal low-income Lifeline program, which offers a monthly discount of up to \$9.95 per household and can be combined with the ACP credit if the customer also purchases a voice service.

Project Costs and Budget

Project Costs and Budget

Please complete the following table with project cost information.

Total Project Cost:	27,746,086.21
Total Grant Request:	16,370,190.87
Total Match Amount:	11,375,895.34
Total Match Percentage:	41.00

Total matching funds: Please complete the table below summarizing the source, amount, and type of matching funds contributed to the project. Applicants should also indicate if the match is secured or not.

Source	Amount	Type	Secure
Frontier	8,939,798.34	Cash	Yes
Clinton County	2,436,097.00	Cash	Yes

Match commitment letters or evidence

Name of Attachment	Match commitment letters or evidence
Frontier_Affadavit of Financial Capability.pdf	319_0_Frontier_Affadavit of Financial Capability.pdf
Frontier_Audited Financial Statements 2020-2022	319_1_Frontier_Audited Financial Statements 2022-2020.pdf
MI Clinton County MOU with Frontier Fully Executed	319_2_MI Clinton County MOU with Frontier Fully Executed.pdf
Bath Charter Township Funding LOI	319_3_Bath Charter Township Funding LOI.pdf
Eagle Township Funding LOI	319_4_Eagle Township Funding LOI.pdf
Victor Township Funding LOI	319_5_Victor Township Funding LOI.pdf

If matching funds or in-kind contributions listed above are not yet secured, please describe the process remaining to secure the funds and the anticipated timeline to do so. (250 words max.):

Budget Summary for Realizing Opportunities with Broadband Infrastructure Networks Grant - 2023
 Agency: Frontier North Inc.
 Application: Clinton County

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	Category	Total	Requested	Cash	Inkind	Narrative
1	Building and Labor					
2	Last Mile Construction Labor					
3	Middle Mile Construction Labor					
4	Last Mile Construction Material					
5	Middle Mile Construction Material					
6	Customer Premise Equipment					
7	Customer Premise Installation					
8	Electronics					
9	Permits					
10	Professional Services and Engineering					
11	Other					
TOTAL EXPENDITURES						

Budget Additional Information

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Budget Narrative

Please provide a brief narrative to accompany your project budget (max 400 words).

Attach additional information as necessary

[449_Frontier_Certification_of_Prevaling_Wage.pdf](#)

Five-year stand-alone project financial plan/forecast.

Please use the table to complete a five-year stand-alone project financial plan/forecast.

Five-Year Stand-Alone Project Financial Plan

Project Name	Year 1	Year 2	Year 3	Year 4	Year 5
Anticipated Revenue					
Anticipated Expenses					
Anticipated Grant Funds					
Cash Flow					
Cummulative Cash Flow					

Please provide a brief narrative to accompany your five-year stand-alone project financial plan/forecast (400 words max.):

Additional forecast information

Project Readiness

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Engineering designs, diagrams, and maps

Budgetary engineering designs, diagrams, and maps that show the proposed project. Design documents must clearly demonstrate the applicant’s complete understanding of the project and ability to provide the proposed solution. This information must be certified by a professional engineer.

Name of Attachment:	Budgetary engineering designs
Frontier FTTP Designs Confidential	353_0_Frontier_FTTP_Designs_Confidential.pdf
Frontier Scalability	353_1_Frontier_Scalability.pdf
Frontier_Clinton_County_MI_PE_Certification	353_3_Frontier_Clinton_County_MI_PE_Certification.pdf
Frontier_Clinton_County_Maps	353_3_Frontier_Clinton_County_Maps.pdf

Please provide a brief statement to accompany your attached engineering designs, diagrams, and maps indicating your readiness to build, manage, and operate the proposed network.

As an existing telecommunications provider in the County, Frontier works closely with government stakeholders and agencies responsible for overseeing work within the public Right-of-Way (ROW). When a Frontier project is selected for broadband funding, our initial focus is placed on special permits that tend to have longer lead times. In addition, Frontier and Clinton County have committed to work collaboratively in furtherance of the Project and a broader expansion of FTTP in the Community. The County has committed to streamline permitting to the extent feasible. Following detailed engineering, Frontier and the County will begin applying for standard permits that typically have a 60–90-day approval timeline depending on the agency.

Fiber will be placed in existing conduit or on existing poles where applicable. Where conduit or poles do not exist, fiber will be placed in an existing easement and/or right-of-way following the existing copper facilities path. If Frontier needs to place a new fiber optics path, Frontier will contact required environmental agencies and obtain permits and environmental studies as required. Frontier has extensive existing assets such as land, buildings, power systems, poles, conduit, rights of way, supplies on hand and work vehicles that it will leverage to ensure the lowest possible total costs for this Project and to keep the project schedule within grant program timeframes. This Project will also leverage existing middle mile Inter-Office Facilities, network monitoring teams and systems, product management personnel and customer sales and support centers to ensure reliable and relevant services at competitive and affordable rates.

Frontier will draw upon its vast experience in planning, engineering, constructing, provisioning and operating FTTP networks that provide symmetrical gigabit service to residential and commercial customers. This expertise is critical to overall project success. It also identifies and mitigates any potential project issues, promptly responding to unexpected events and contingencies, and timely plan revisions when needed. The Project and the ongoing provision of gigabit broadband service will also rely on Frontier’s existing capabilities for installing and providing service to end users, further supplementing the cost efficiency of the Project. The Project would also leverage Frontier’s service-

related capabilities including its established sales, customer support and service functions.

Evidence of network scalability

Evidence of network scalability

Name of Attachment	Evidence of network scalability
Frontier Scalability	357_0_Frontier_Scalability.pdf

Please provide a description and evidence that the proposed infrastructure is scalable to meet the anticipated future connectivity demands of the proposed service area. Please indicate the end-user connection speed to which the proposed network is designed to scale. This information must be certified by the equipment manufacturer or a professional engineer. (250 words max.):

A fiber network provides the Project locations with the fastest symmetrical services available today and the ready ability to cost-effectively augment capacity to meet future needs. The optical equipment utilized is designed to support up to 10G symmetrical.

With fiber, capacity augmentation and increased performance can be achieved through the addition and/or upgrade of system electronics, a task that does not require significant construction or cost. Thus, the planning and timing of future upgrades is driven by the comparatively short timelines for engineering, procurement and installation of new electronics in the network and at the customer premises and not major external construction factors.

Project Schedule

28. Please use the table below to complete a project schedule outlining individual tasks and their timing by quarter and year. All projects must be complete by December 31, 2026. (If you need to add additional lines, click on 'Save' and the system will add an additional five lines each time.)

Task	2023		2024		2025		2026							
	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Contract Execution (signed agreement + 30 days): Identify Priority Areas, Issue Network Plans, Vendor Selection for Buried Construction, if needed	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Detailed Design (signed agreement + 30-240 days): Design Low Level Routes, Complete Make-Ready Engineering, Submit All Permit Applications, Create Bill of Materials and Order Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction (signed agreement + 180-625 days): Notify Residents via Door Hangers, All Permits Approved, Perform Make-Ready Construction, Place Strand, Conduit and Fiber, Splice and Test Fiber	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Network Activation (signed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Project Readiness for Realizing Opportunities with Broadband Infrastructure Networks Grant - 2023
 Agency: Frontier North Inc.
 Application: Clinton County

agreement + 270-700 days): Install Network Equipment, Test and Activate Network Electronics, Start Marketing Activities, Start Customer Installations (locations will be opened on a rolling basis throughout this period)														
Project Closeout (signed agreement + 300-730 days): Continue Network Equipment Installation and Activation, Closeout Permits and Submit Project Documentation, Continue Marketing, Continue Customer Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Anticipated completion date

Please indicate the anticipated date upon which service to the last location in the proposed project area will be made available. 08/30/2025

Please list any factors that would change or delay the proposed schedule.

Although Frontier does not anticipate any significant change or delay to the proposed schedule, the following factors have the potential to affect the Project schedule: an unusual delay in permit approvals, an unusually long winter or prolonged rain that negatively impacts the construction window, unexpected delay in delivery of supplies or equipment, and/or an unexpected need for environmental or historical review.

Have all the required local/city/county/state approvals and/or permits necessary for this project to proceed been obtained? Yes No

If No, what remains to be done and what is required for completing the process of obtaining approvals? Include any permitting timeline in the project schedule.

As an existing telecommunications provider in the County, Frontier works closely with government stakeholders and agencies responsible for overseeing work within the public Right-of-Way (ROW). If a Frontier project is selected for broadband funding, our initial focus will be placed on special permits that tend to have longer lead times. Following detailed engineering, Frontier will begin the process of applying for standard permits that typically have a 60-90-day approval timeline depending on the agency.

Will this project require state or federal environmental review, approval, or permits? Yes No Unsure

If Yes, what remains to be done and what is required for completing the process of obtaining approvals? Include any permitting timeline in the project schedule.

Will this project require state or federal historic, architectural, or archeological review, approval, or permits? Yes No Unsure

If Yes, what remains to be done and what is required for completing the process of obtaining approvals? Include any permitting timeline in the project schedule.

Project Readiness

Additional evidence of project readiness

Name of Attachment:	Evidence of project readiness
	390_0_Frontier_Certifi

Project Readiness for Realizing Opportunities with Broadband Infrastructure Networks Grant - 2023
 Agency: Frontier North Inc.
 Application: Clinton County

Certification of Project Readiness.pdf	Certification of Project Readiness.pdf
MI Clinton County MOU with Frontier Fully Executed.pdf	390_1_MI Clinton County MOU with Frontier Fully Executed.pdf

Please provide any additional evidence of your project’s readiness. This evidence can include, but is not limited to, letters of intent, memorandums of understanding, land/tower lease agreements, right-of-way agreements, permits, etc. Provide a short narrative to accompany this additional evidence.

Frontier and Clinton County have established a Public Private Partnership to expand FTTP to businesses and residents in the community and are committed to not only jointly financing this fiber expansion but also to working collaboratively to facilitate fiber deployment and consumer adoption of fiber services, including low-income consumers. Clinton County conducted a competitive bid process and selected Frontier as its partner based on Frontier’s formal submissions, which included required detail about Frontier’s capabilities, location data, project scope, expected cost, and confirmation of capabilities with identified references. As a result, Clinton County has already vetted Frontier and had determined it has the ability to undertake and complete fiber deployment that includes the grant eligible locations. A copy of the Memorandum of Understanding between Frontier and Clinton County is attached.

Applicant Capacity

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Brief history of your organization

Please provide a brief history of your organization including experience relevant to the proposed project and your technical, financial, and managerial capabilities to complete the project within the designated project period. (250 words max.):

Frontier is a telephone and fixed wireline broadband service provider in Michigan. Frontier serves millions of residential, small business and enterprise customers across 25 states. In 2021, Frontier launched its Building Gigabit America™ initiative to expand FTTP to 10 million locations by the end of 2025 and is already halfway to meeting this goal. Since starting its major fiber expansion, Frontier has honed its deployment capabilities and deployed fiber to a record 1.2 million new locations across its footprint in 2022. Frontier’s deployment capabilities are the envy of the industry—it has a well proven ability to execute complex network and FTTP deployment projects across a variety of different scenarios, including remote, rural, suburban, urban communities, and Tribal lands.

Frontier’s 85+ years of knowledge and expertise in building, operating and maintaining telecommunications networks with the best of today’s innovation and its commitment to deliver premier internet connectivity—symmetrical gigabit FTTP—best positions the company to serve the Project Area. Frontier’s Executive Management Team has decades of experience as telecommunications industry leaders and is supported by highly knowledgeable and skilled senior leaders and telecommunications professionals located in Michigan and the other states Frontier serves. Frontier augments its operational and expansion needs through an established network of fiber deployment partners and technical expert vendors.

Organization Chart & Resumes

Applicant organizational chart

Name of Attachment	Organizational chart
Frontier Organizational Chart	329_0_Frontier_Orga nization Chart.pdf

Resumes of key officers, management personnel, and proposed project management team

Personnel Name	Resume
John Stratton	332_0_John Stratton_resume.pdf
Nick Jeffery	332_1_Nick Jeffery_resume.pdf
Alan Gardner	332_2_Alان Gardner_resume.pdf
Charlon McIntosh	332_3_Charlon McIntosh_resume.pdf
Diane Williams-Stinson	332_4_Diane Williams- Stinson_resume.pdf
Erin Kurtz	332_5_Erin Kurtz_resume.pdf
Ettienne Brandt	332_6_Ettienne Brandt_resume.pdf
Jeremy Ferkin	332_7_Jeremy Ferkin_resume.pdf

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Jerry Kole Sanders	332_8_Jerry Kole Sanders_resume.pdf
Mark Nielsen	332_10_Mark Nielsen_resume.pdf
Melissa Pint	332_11_Melissa Pint_resume.pdf
Ron Poteete	332_12_Ron Poteete_resume.pdf
Scott Beasley	332_13_Scott Beasley_resume.pdf
Veronica Bloodworth	332_14_Veronica Bloodworth_resume.pdf
Vishal Dixit	332_15_Vishal Dixit_resume.pdf
John Harrobin	332_15_John Harrobin_resume.pdf

Audited Financial Statements

Three years of audited financial statements

Attachment Name	Audited Financial Statements
Frontier Audited Financial Statements 2022-2020	336_0_Frontier_Audited Financial Statements 2022-2020.pdf

Please provide a brief statement to accompany your attached audited financial statements and documentation.

Frontier's 2022 Financial Reports show Frontier has sufficient funding for its proposed contribution toward the Project costs. As of December 31, 2022, Frontier had total liquidity of \$2.8 billion, including a cash and short-term investments balance of approximately \$2.1 billion and \$0.7 billion of available borrowing capacity on its revolving credit facility. Frontier's net leverage ratio on December 31, 2022, was approximately 3.4x. Frontier has no long-term debt maturities prior to 2027.

Partners, subcontractors, or vendors associated with the project's deliverables

Describe any partners, subcontractors, or vendors associated with the project's deliverables, including but not limited to adoption, deployment, and service delivery. Describe each party's role in the project. This should include a discussion of whether and to what extent the applicant, as well as its anticipated partners, subcontractors, or vendors are organizations incorporated, headquartered, or with a principal place of business in Michigan.

Frontier complements and augments its internal planning, design, construction and technical expertise, and its operational and expansion activities through an established network of fiber deployment partners and technical expert vendors. Frontier has established arrangements with several national and regional vendors and construction firms for its fiber construction projects, including in Michigan. Frontier is likely to engage one or more construction firms to help place underground and aerial fiber needed for this Project, and a specific choice of vendor will depend on the exact timing of a Project award and execution of formal grant documents. Frontier may also supplement its workforce, as needed with contracted engineering, fiber optic cable and electronic experts, and drop cable installation resources.

Frontier is committed to broadband adoption and offers low-income consumers subsidized services to ensure all residents can realize the benefits of fiber. Frontier and Clinton County have agreed to work in concert to promote adoption of fiber services, with a particular focus on low-income

consumers. Specifically, the County will assist, through its community agencies and resources that serve low-income populations, in informing and educating low-income residents on the availability of the program, eligibility requirements and the process for enrollment in the ACP program.

Safety and training standards

Describe the safety and training standards in place for your employees, including professional certification, licensure, and/or robust in-house training opportunities.

Learning and development is essential to both the short- and long-term growth of Frontier's workforce. It is critical to maximizing people performance and business success. Therefore, it is essential that Frontier's workforce has the knowledge and skills to meet the demands of a dramatically changing work environment. Frontier continuously looks to upskill its changing workforce to ensure that they have the right skills and capabilities. To do so, Frontier provides its workforce a simple, modern, engaging and intuitive learning experience to increase their skills and abilities. This is accomplished through several means.

Frontier provides employees access to an online Learning Management System, Cornerstone. This System is the main technology that Frontier uses to develop a competitive and engaged workforce and support a culture of continuous learning. The System also provides Frontier the means to manage and track employee progress and compliance through training & educational content. It contains workforce development modules for Learning & Development, Performance Management, Succession Planning, Content specific learning libraries (such as professional skills, leadership and management) and Compensation. The targeted Learning Libraries allow anytime access to close skill gaps and build professional, leadership and management skills and abilities through courses and other means such as videos, articles, podcasts and books.

Frontier also offers employees a Tuition Assistance Program for coursework leading to a degree or certification in a relevant field of study from accredited universities and institutions. Through this Program, Frontier provides 100 percent tuition for union employees (as spelled out in each union contract) and 50 percent reimbursement for non-union employees up to \$5500 a year.

Also indicative of a highly skilled workforce is the average length of time in service for Frontier's 14,000+ employees. Frontier's union employees comprise 68 percent of its workforce and have an average of 18.8 years in service with the Company. Frontier's non-union workforce, comprising 32 percent of its workforce, has an average of 13.5 years in service.

Frontier has a robust safety program composed of both in-person as well as on-line training. Topics are determined by OSHA requirements and our own internal risk analysis based on monthly generated metrics. Examples of training programs are: 1. Critical Skills Training: On a quarterly basis technical workforce must take refresher training in a high-risk subject area and then demonstrate to their supervisor their ability to perform the skill safely. 2. Monthly Safety Training: This goes out to the entire workforce on a given Safety topic. 3. Safety Shorts: A weekly safety training program that provides training and reminders on a focused topic. 4. New Hire Training. 5. Safety Alerts: Periodic training that is provided to the workforce based on Frontier experience, a current event, or change in requirement. Safety Training is tracked through our Learning Management System (Cornerstone) and the Employee Health and Safety Proprietary scorecard.

Violations of federal or state labor and employment laws

Have there been any recent violations of federal or state labor and employment laws by your organization? Yes No Unsure

If Yes, please describe in detail.

Labor standards

Does your company incorporate strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate? Yes No

If Yes, please describe.

Frontier and its subsidiaries maintain compliance with federal and state labor and employment laws, including but not limited to, Title VII of the Civil Rights Act of 1964, 29 U.S.C. §2000e et seq.; the Age Discrimination In Employment Act of 1967, 29 U.S.C. §621 et seq. ("ADEA"); the Federal Rehabilitation Act of 1973, 29 U.S.C. §701 et seq.; the Americans with Disabilities Act of 1990, 42 U.S.C. §12101 et seq.; the Family and Medical Leave Act of 1993, 29 U.S.C. §2601 et seq.; the Fair Labor Standards Act of 1938, 29 U.S.C. §201 et seq.; the Equal Pay Act of 1963, 29 U.S.C. §206(d) et seq.; the Employee Retirement Income Security Act of 1974, 29 U.S.C. §301 et seq.; and their State counterparts.

Each year all Frontier employees are required to complete the Frontier "Code of Ethics" (Code) training. Frontier's Code includes Frontier's commitment to creating and maintaining a diverse and inclusive work environment that emphasizes treating all with dignity and respect. In addition, Frontier works to ensure equal opportunities for success in all aspects of employment. Our Company does not make any employment-related decisions based on race, color, religion, national origin, ancestry, sexual orientation, gender, marital status, age, physical or mental disability, veteran status, or any other legally protected status. The Code also indicates Frontier does not tolerate illegal discrimination, harassment, or threats of any kind. Comments or conduct relating to a person's race, color, religion, national origin, ancestry, sexual orientation, gender, marital status, age, physical or mental disability, or veteran status that fail to respect the dignity of the individual are unacceptable. Such unacceptable behavior can be either sexual or non-sexual in nature and can include, among other things, the following: derogatory comments or jokes, visual displays, such as offensive photographs, videos, and drawings, unwelcome conduct, including physical contact, such as touching, hugging, and massaging, and assault, bullying, or intimidation. Frontier does not tolerate harassment or discrimination (whether committed by a coworker, a supervisor or even a non-employee) and does not tolerate retaliation against anyone for a good faith report of discrimination or harassment. Employees are directed to report any possible illegal or unethical conduct. Those reports are quickly investigated and the appropriate action, if any, is taken.

Frontier currently employees approximately 10,000 union employees which makes up 68% of the employee population. These employees are covered by one of 54 collective bargaining agreements representing 72 Locals from Communication Workers of America (CWA), International Association of Machinists (IAM), International Brotherhood of Electrical Workers (IBEW), United Steelworkers, and Worker's United.

Hiring Policy

For this project, will additional labor force needs be met by hiring staff directly with your organization or contracted through another entity?

Directly with company

Contracted through another agency

If direct hire, please estimate the total number of new, directly hired staff needed to complete this project.

If this project will be completed using contracted labor, describe your policies and practices that ensure contractors and subcontractors meet high labor standards.

Frontier hires subcontracting firms, as needed, to complement its internal functional teams and expertise. The work includes detailed engineering, placement of fiber optic cables and electronics, as well as installation of drop cable facilities directly to customer premises. Frontier's contracts require all contractors to conform to applicable laws, codes and regulations and actively monitors their performance through regular inspections, including at the conclusion of project work.

Frontier vetted multiple construction vendors in 3Q 2021 to assure availability of construction resources for upcoming FTTP projects. The vendors are able to provide detailed engineering services, including securing permits required for the build, procurement of material, and construction of Outside Plant (?OSP?) associated with Frontier's planned projects. These vendors have the capacity to handle both Frontier's ?business as usual? projects and approved grant-related builds. Frontier also has sourcing contracts with a variety of outside plant material vendors that we partner with to meet our forecasted needs and we continue to vet new vendors, as needed. Frontier generates material forecasts for each opportunity they respond. Frontier has long term contracts with material vendors and commitments for delivery of ~15M feet of fiber monthly starting in 2023. Frontier continues to add to material, engineering, and construction capacity. At this time, particulars about which subcontractors or vendors Frontier may use for this project has not been determined but will be known as quickly after an award is finalized as practicable.

Prioritization efforts to hire local workers

Describe any prioritization efforts to hire local workers and/or workers from historically disadvantaged communities for this project.

Frontier broadly advertises its workforce needs and conducts outreach locally, as appropriate. Certain functions, by nature of their scope of responsibilities, are tethered to a specific location. Frontier is prepared to work with the County leaders to access local talent pools to the extent possible and as needed to operate its network and service consumers. Frontier must hire locally for certain customer facing servicing positions—like installation and service technicians. Frontier also centralizes many corporate functions like marketing, finance, legal, etc. Frontier permits remote work for many positions that can be done remotely. As a result, the opportunity for local hiring is not limited to field positions.

Frontier and its subsidiaries maintain compliance with federal and state labor and employment laws, including but not limited to, Title VII of the Civil Rights Act of 1964, 29 U.S.C. §2000e et seq.; the Age Discrimination In Employment Act of 1967, 29 U.S.C. §621 et seq. ("ADEA"); the Federal Rehabilitation Act of 1973, 29 U.S.C. §701 et seq.; the Americans with Disabilities Act of 1990, 42 U.S.C. §12101 et seq.; the Family and Medical Leave Act of 1993, 29 U.S.C. §2601 et seq.; the Fair Labor Standards Act of 1938, 29 U.S.C. §201 et seq.; the Equal Pay Act of 1963, 29 U.S.C. §206(d) et seq.; the Employee Retirement Income Security Act of 1974, 29 U.S.C. §301 et seq.; and their State counterparts.

Community and Economic Impact

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Community Support for this project

Demonstration of interest/impact/support from communities **(If you need to upload additional support letters, click on 'Save' and the system will add an additional five lines.)**

Name of Community / Organization	Support Letters
Bath Charter Township Funding LOI	414_0_Bath Charter Township Funding LOI.pdf
Bengal Township Support Letter	414_1_Bengal Township Support Letter.pdf
Bingham Township Support Letter	414_2_Bingham Township Support Letter.pdf
City Of Ovid Support Letter	414_3_City Of Ovid Support Letter.pdf
City Of St Johns Support Letter	414_4_City Of St Johns Support Letter.pdf
Dallas Township Support Letter	414_5_Dallas Township Support Letter.pdf
DeWitt Charter Township Support Letter	414_6_DeWitt Charter Township Support Letter.pdf
Eagle Township Funding LOI	414_7_Eagle Township Funding LOI.pdf
Essex Township Support Letter	414_8_Essex Township Support Letter.pdf
Greenbush Township Support Letter	414_9_Greenbush Township Support Letter.pdf
Lebanon Township Support Letter	414_10_Lebanon Township Support Letter.pdf
Olive Township Support Letter	414_11_Olive Township Support Letter.pdf
Ovid Township Support Letter	414_12_Ovid Township Support Letter.pdf
Victor Township Funding LOI	414_13_Victor Township Funding LOI.pdf
Watertown Charter Township Support Letter	414_14_Watertown Charter Township Support Letter.pdf
MI Clinton County MOU with Frontier Fully Executed	414_15_MI Clinton County MOU with Frontier Fully Executed.pdf

Please provide a description of the community support for this project to accompany relevant attachments. Community support can be expressed through public-private partnerships, letters of support, memorandums of understanding, community broadband plans, or other relevant and appropriate documents.

Clinton County and the communities within it support expansion of the fiber broadband network. The County has determined that increasing access to broadband is vital to the maintenance and growth of its economy and workforce. Access to reliable high-speed internet also plays a central role in the quality of life for county residents. The importance of this understanding led Clinton County seek an ISP partner via an RFP process. The outcome of this process is that Clinton County has agreed to formalize a public-private partnership with Frontier if ROBIN grant funds are awarded to this application. As part of this proposed partnership, Clinton County has committed to contributing \$2,436,097 in ARPA funds toward the project. Community support is further demonstrated by the attached letters of intent and support from 15 Clinton County townships and cities. Many of these townships and cities have also committed funds to further bolster this broadband expansion.

Community Interest

Demonstration of customer interest

Name of Attachment	Customer Interest
Clinton County Broadband Survey - Mitchell	394_0_Clinton County Broadband Survey - Mitchell.pdf

Please provide a brief statement to accompany the demonstration of customer interest you have attached to this application. This description should include the method used for gauging customer interest and the results.

In January 2022, Clinton County engaged Mitchell Research & Communications, Inc. to conduct a survey of county residents on broadband issues. Responses were collected via telephone and online through a SurveyMonkey link on the Clinton County webpage. The responses were summarized based on area within the county. In turn, these areas were assigned to one of two regions in the county, each with approximately half of the county’s population. Overall, Region I is more rural than Region II and generally aligns with the areas for expanded service proposed in this application. Survey responses across the county do not indicate satisfaction with the current reliability, speed, or cost of current service options. Additionally, 85% of respondents indicated that high-speed internet is “absolutely necessary” to quality of life. Participants have a strong interest in high speed internet. The survey asked if participants would prefer a 100Mbps service priced at \$49.95 or a 1 Gbps service priced at \$79.99. Although the mean score for the less expensive option is much higher, there still is interest in the more expensive option. It should be noted that Frontier currently offers fiber broadband services starting at \$49.95 (with promotional discounts).

Community Anchor Institutions (CAI) served

Please list the specific community anchor institutions (CAIs) to be served by the proposed project. Attach evidence of support for the project from impacted CAIs (if applicable). **(If you need to upload additional support letters, click on 'Save' and the system will add an additional five lines.)**

CAI Name	Address	Type of CAI	Letter of Support
Township of Bengal	6586 W M 21 , Saint Johns, MI 48879	Other (Municipal Building)	458_1_Bengal Township Support Letter.pdf

SPIN Information

Evidence of application for a SPIN (if applicable) **If the proposed project includes connections to schools or libraries, please ensure you have entered your SPIN at the beginning of this application. For applicants without a SPIN please provide evidence of your application for a SPIN.**

Name of Evidence	Evidence of Application for SPIN

If the proposed project includes connections to schools or libraries, please provide your SPIN or evidence of application for a SPIN from the FCC Universal Service Administrative Company (USAC) and demonstration of your knowledge of E-rate and working with the FCC/USAC.

Need for improved broadband service for businesses

Evidence of interest, impact, or support from businesses. **(If you need to upload additional Evidence of Interest, click on 'Save' and the system will add an additional five lines.)**

Name of Attachment	Evidence of interest
LEAP Broadband Letter of Business Need	398_0_LEAP Broadband Letter of Business Need.pdf
Economic Impact Analysis of COVID-19 on the Tri-County Region	398_1_Economic Impact Analysis of COVID-19 on the Tri-County Region.pdf

Please provide a brief description of the businesses needing improved broadband service in the proposed project area and the level of improvement needed. Attach statements or evidence regarding the benefits from the proposed connectivity solution and how it will impact those businesses.

All businesses increasingly need high-speed broadband connectivity to conduct business and service customers. Frontier's symmetrical fiber services offer a range of connectivity capabilities for businesses of all sizes from the local bakery to the local hospital or manufacturing outlet. This Project will equip businesses to work more efficiently and productively and provide them invaluable interconnection to markets outside the local area. In addition, fiber connectivity opens additional cost-saving and e-commerce opportunities on both a local and global basis and broadens and strengthens the talent, vendor, resource, and customer pool for local businesses. The positive impacts of fiber services will also extend to businesses outside the Project Area, which will have a greater ability to connect with and service local residents. Reliable high-speed symmetrical internet service also facilitates the creation and success of home-based businesses.

"Economic Impact Analysis of COVID-19 on the Greater Lansing Tri-County Region," a report developed by the Tri-County Regional Planning Commission in 2021, found that although many workers in the Greater Lansing area would be able to work remotely, median internet speed in many rural areas may not be sufficient to support this shift. Of the region's three counties, Clinton County's speeds were identified as the slowest. In addition to supporting shifts to remote work, improved broadband would strengthen small businesses, particularly sole proprietorships that often operate out of their homes. The Lansing Economic Area Partnership (LEAP) highlights the importance of this in its attached letter of support.

Direct job creation

Evidence of job creation

[459__Clinton County Broadband Economic Model_13March2023.pdf](#)

Describe and account for any direct job creation in the proposed service area related to this project, if funded. Provide supplemental evidence if available. Job creation here means those jobs created in the community as a result of new internet connectivity being deployed, not any jobs created to deploy the proposed network.

The symmetrical fiber broadband services made available by the Project will positively impact quality of life in Clinton County by facilitating participation in our increasingly digital society and create greater access to effective and efficient distance learning, telemedicine, and telework opportunities that rely on communications applications which require high upload speeds. Additionally, the Project will promote economic development of the served locations and surrounding community by bringing fiber broadband to locations that are currently unserved and/or underserved. These businesses and community anchor institutions will save costs, expand the scope of their services, increase productivity and will better serve the community. Attached is a file containing the results of an Economic Impact Model by Guidehouse for Clinton County showing evidence of an additional 1,772 jobs created as a result of completing the proposed project (see page 2 of the attached).

Affordable broadband access is critical to the success of addressing the workforce needs of employers within

the County, which increasingly rely on highly trained and digitally sophisticated personnel. The Project and attendant Frontier and Clinton County financed expansion to additional locations in the community will better support workforce access to job opportunities and training courses. The project will also promote economic growth in and around serviced areas such as the development of new home-based and local small businesses. The Project will also provide students critical access to remote learning and skill building resources. If approved, Project will help enable Clinton County students to position themselves and their community for personal and economic success.

Training and Awareness

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Proposed digital literacy training events, materials

Please describe any proposed digital literacy training events, materials, and/or resources that will be provided to residents or businesses impacted by the proposed connectivity. Include the number and type of events, including commitments from any partners included in the digital literacy training and the anticipated outcomes from related activities. The description must provide clear detail and contain measurable metrics for the proposed programs or partnerships.

Frontier has partnered with Learning.com to deliver digital literacy instructional solutions for learners of all ages in communities for which Frontier has received broadband infrastructure funding. This partnership combines Frontier's broadband expertise with Learning.com's 20+ years of experience working with school districts throughout the US, to teach technology and digital literacy skills.

The Partnership proposes a digital literacy instructional solution, with a special curriculum focused on adult learners and seniors, that enables individuals and/or community anchor institutions ("CAI") to build digital literacy skills for in-need persons in their communities. The solution will include curriculum, training, implementation, and community outreach support and would offer communities the ability to provide online or in person digital literacy instruction to the community. Available digital literacy training materials will include:

- Understanding Computer Fundamentals
- Understanding & Maximizing Online Safety
- Using the Internet Effectively & Responsibly for Online Communication, Collaboration, & Research
- Effective Keyboarding
- Utilizing Technology & Business Productivity Applications

The Partners recognize that many of the CAIs that will serve as the primary contact for their underserved communities do not have experience delivering digital literacy skills instruction and are committed through training, implementation, and community outreach support to assist to build capacity in this area. Frontier and Learning.com are in the process of refining their available curricula and expect to offer two options:

(1) Participating learners will be provided a unique learner ID for the curriculum. The learner ID may be in the form of login credentials or a QR code to login into the training platform. Once the learner has logged in, they may be presented with a prescribed learning path or a choice of specific skill areas.

(2) The Partnership will use a train-the-trainer model for CAIs to serve their learning community using Learning.com's Digital Literacy Solution. Training can be provided via live online webinars or face-to-face sessions. All training can be customized to meet the specific needs of CAIs and the underserved community they serve. Under this approach, the Partnership would be prepared to provide a dedicated resource to support CAIs. This Program Manager will provide support promoting the availability of digital literacy instruction, implementation planning, and facilitate training and support resources to ensure success.

Frontier and Learning.com are committed to working with the County to access digital literacy funding and to provide digital literacy training that best meets the County's needs, as mutually

agreed.

Please upload evidence of training partnership, materials, etc.

[508_Frontier_Digital_Literacy_Learning.com_Partnership_Letter.pdf](#)

Materials and Method(s) to be used

Please describe the materials and method(s) to be used for providing residents and businesses with information promoting the use of an internet connection for improving quality of life, access to resources, economic opportunity, etc., in the proposed service area. Partnerships with local CAIs that build awareness for enriching online opportunities for residents and businesses are highly encouraged.

Examples of these opportunities include, but are not limited to, telehealth applications, access to government services, e-learning, job and career readiness programs, public safety information, cybersecurity training, etc. This description must provide clear detail and contain measurable metrics.

Frontier and the County have committed to work together to ensure that residents and businesses are educated about the benefits of fiber to individuals and communities. Frontier intends to broadly advertise the availability of its services and its performance capabilities to grant supported locations, through a variety of channels including but not limited to direct mail, in person community outreach, online and in coordination with the County. In anticipation of this effort, Clinton County has reached out to several local libraries, school systems, and community organizations to gather information and gauge willingness to support future digital training work. At least ten of these local organizations have expressed interest in the possibility of engaging residents in digital training and education.

Frontier and the County intend to work together to promote digital literacy and the availability of Frontier's Affordable Connectivity Program offerings. In addition, Frontier provides a variety of educational tools on Frontier.com to help consumers understand what a fiber connection can enable them to do. Frontier and the County are an established partnership and are each committed to working together to drive adoption in the community, including through new or different strategies based on community responses and needs. Further, the County is confident that improved fiber availability will better enable it to promote and maximize participation in its existing and/or to be developed government services, e-learning, job and career readiness programs, public safety information, any digital literacy programs such as that discussed above, and other community resources. Frontier and the County's shared goal is conducting outreach to 100% of the locations included in the Project and will look to expand outreach beyond the Project area.

Evidence of awareness activities

[511_Frontier_Digital_Literacy_Curriculum.pdf](#)

Commitment to improving the adoption rate of broadband services

Describe how the project commits to improving the adoption rate of broadband services, including, but not limited to, special service rates, internet-enabled devices that meet the needs of the user, and digital skills training.

As noted in elsewhere in this application, Frontier is a participant in the Affordable Connectivity Program and offers 100 Mbps symmetrical service to income eligible consumers at zero cost with the applicable discount. Frontier and Clinton County are committed to broadband adoption and have agreed to work in concert to promote adoption of fiber services, with a particular focus on low-income consumers. Specifically, the County will assist, through its community agencies and resources that serve low-income populations, in informing and educating low-income residents on the availability of the program, eligibility requirements and the process for enrollment in the ACP program.

Promotion of customer take rate

Explain how you plan to promote customer take rate, including marketing activities, outreach plan, and other actions to reach the identified serviceable units within the project area. Provide the anticipated take rate and describe the basis for the estimate.

Frontier and Clinton County intend to work in concert to ensure community awareness of the Project and availability of high-speed services by utilizing a variety of Frontier and official County communications channels. For instance, as construction projects in neighborhoods are about to begin, direct mail and door hangers are utilized to notify customers of the construction process and provide contact information for more information. In addition, Frontier expects to use some or all of the following marketing efforts, which it has successfully utilized for other similar projects to raise community awareness of new and upcoming broadband services:

- Direct mailers
- Local newsprint
- Outdoor signage
- Media ads
- Ribbon Cutting or other local events

If awarded grant funding, Frontier and Clinton County will also meet with other community stakeholders, like local governments, community anchor institutions and chambers of commerce to educate them about the Project and capabilities of fiber infrastructure.

Based on Frontier's extensive experience in the broadband market and its proprietary market research and financial modeling, Frontier anticipates a subscription rate of approximately 60% two years after completion of the Project.