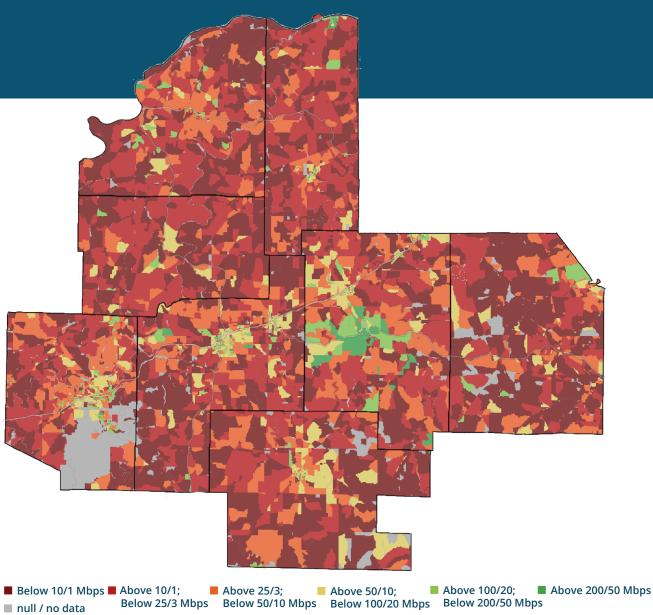
# **Regional Planning Commission**

70% 60,102 6,517

locations without access to 50/10 Mbps 6,517



<sup>■</sup> null / no data Below 25/3 Mibbs Below 50/10 Mibbs Below 100/20 Mibbs Below 200/30 Mibbs

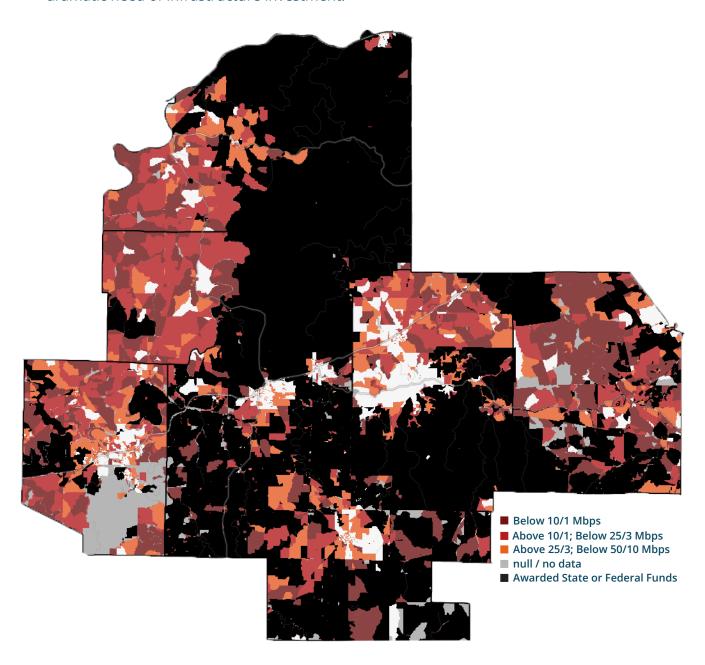
\*Coverage ratings reflect multiple sources, including Ookla Speedtest Intelligence® data licensed by MACOG for the months of December 2020 through July 2023. See Appendix 1 for detailed methodology

# **FUNDED AREAS**

The state of Missouri received federal funding from USDA ReConnect, The Rural Digital Opportunity Fund, and the NTIA. Additional funds from the state were awarded to providers from the Missouri Broadband CARES program, American Rescue Plan Act (ARPA), and the state broadband grant program.

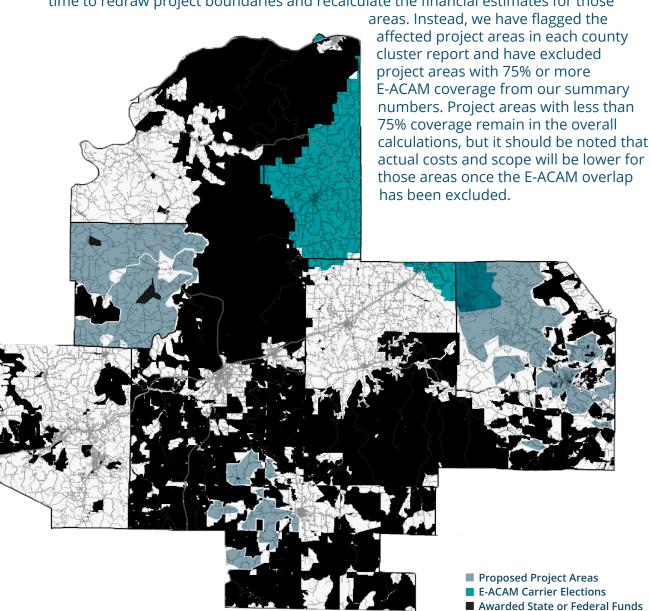
Blocked out areas show existing federal and state awards that were not in default at the time of this report. The remaining areas in red and orange are below 25/3 and 50/10 Mbps respectively and were the areas of focus for the county cluster project planning.

While the Federal definition of "underserved" applies to any location below 100/20, the below 50/10 threshold generates logical, contiguous service areas that remain in dramatic need of infrastructure investment.



The FCC's Connect America Model (CAM) is a long-standing subsidy program that pays telecommunications carriers to offer broadband in their landline telephone territories. The original model targeted 10/1 Mbps. The "alternative" model (ACAM) upped that to 25/3 Mbps. The most recent, "enhanced alternative" model (E-ACAM) offers additional subsidy to carriers who agree to increase speeds to 100/20 Mbps. By the late October 2023 deadline, several of the Missouri-based ACAM providers elected to accept the FCC's E-ACAM offer. As such, these areas become ineligible for BEAD and most other sources of broadband grant funding.

E-ACAM elections will affect 29 project areas in 13 cluster counties, including 10 project areas that have at least 75% of their total area covered by E-ACAM. Because this development came at the end of RCG's period of performance, there was not enough time to redraw project boundaries and recalculate the financial estimates for those

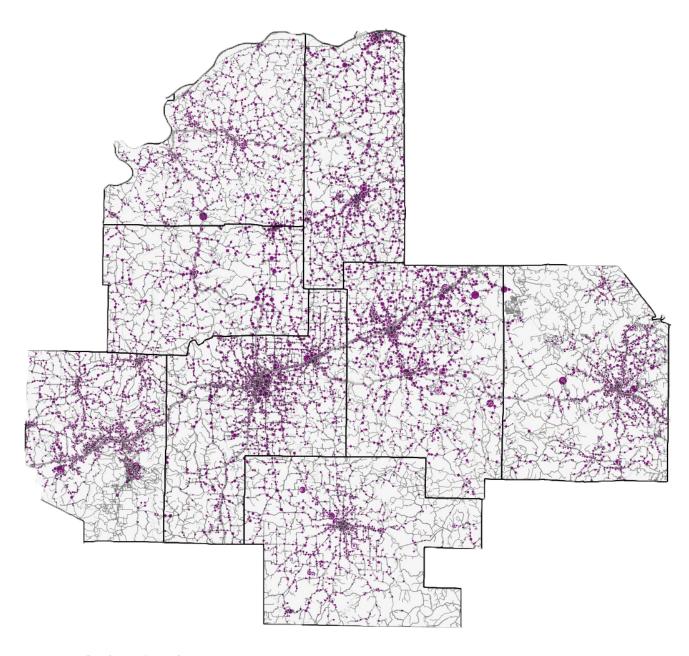


# BUSINESS OPPORTUNITY AREAS

Business demand for broadband varies based on company size and economic sector.

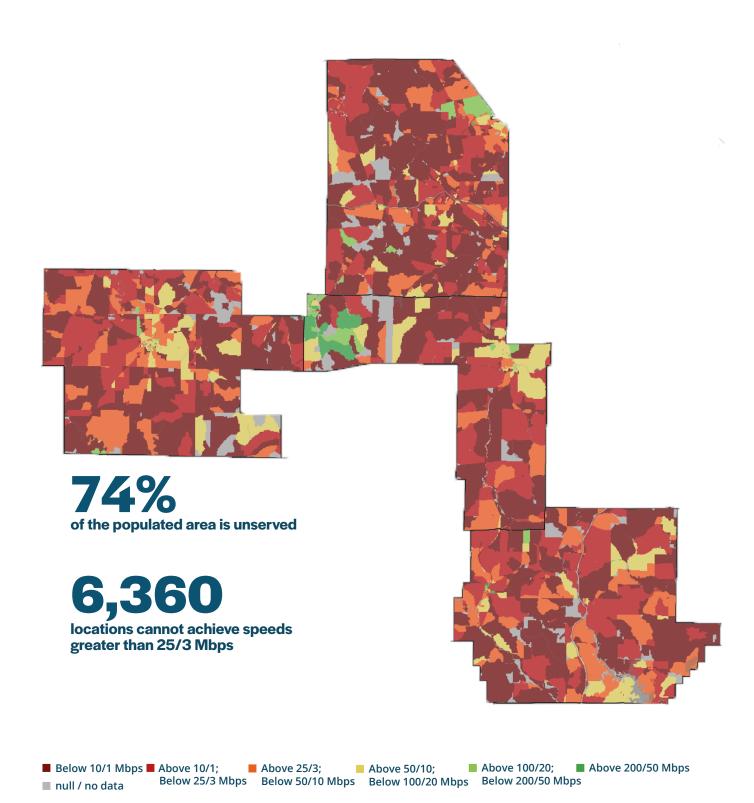
The greater the demand, the bigger the dot. The presence of a high-demand business or multiple businesses of any size will make that area significantly more attractive to a broadband provider.

\*See "Business Broadband Opportunity Index" in Appendix 1 for a detailed explanation of how dot size was determined

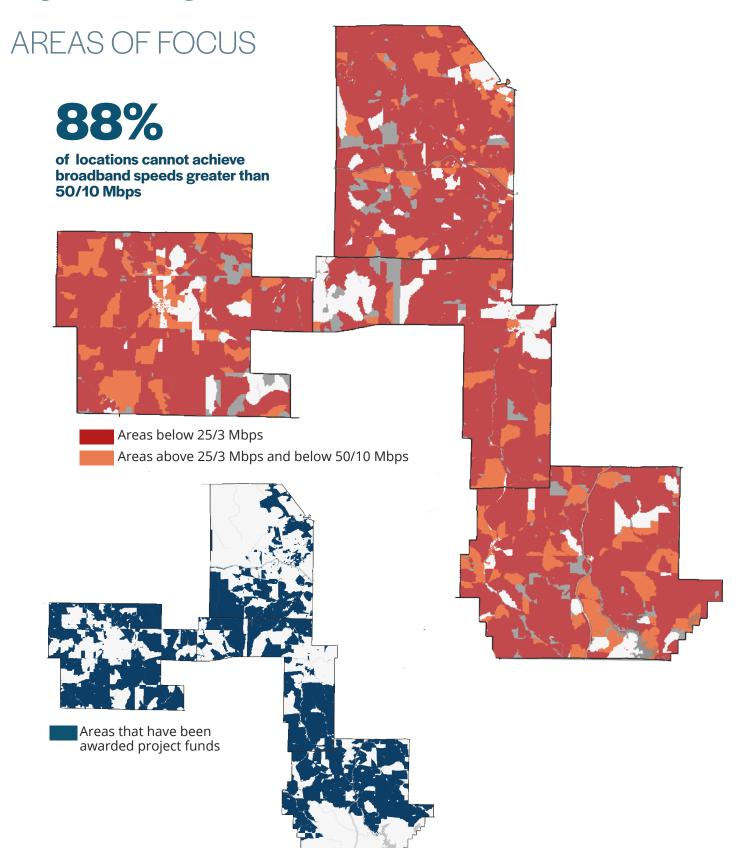


• • Business Locations [the larger the dot the greater the broadband demand]

Dent / Iron / Washington / Wayne \_\_\_\_\_\_\_Project Cluster • Meramec - Ozark Foothills- Southeast Missouri **Regional Planning Commissions** 

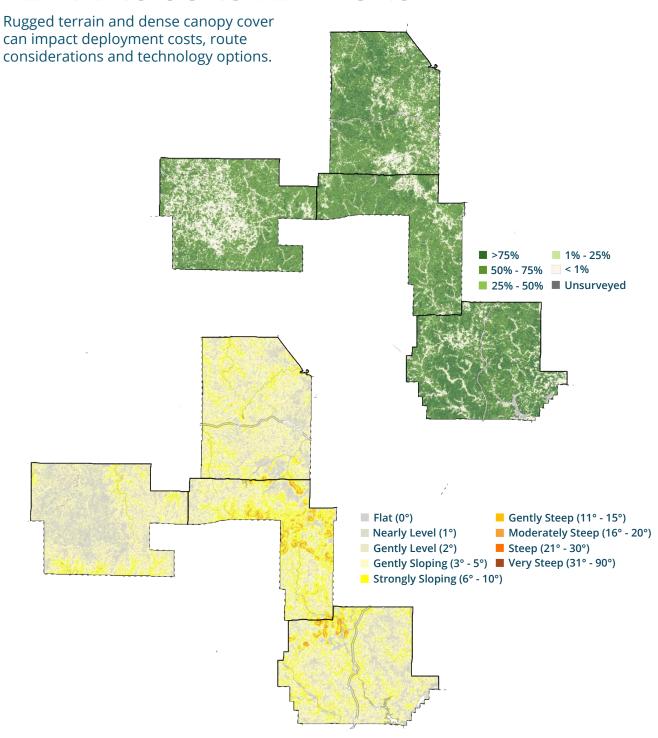


Dent / Iron / Washington / Wayne \_\_\_\_\_\_\_Project Cluster • Meramec - Ozark Foothills- Southeast Missouri **Regional Planning Commissions** 



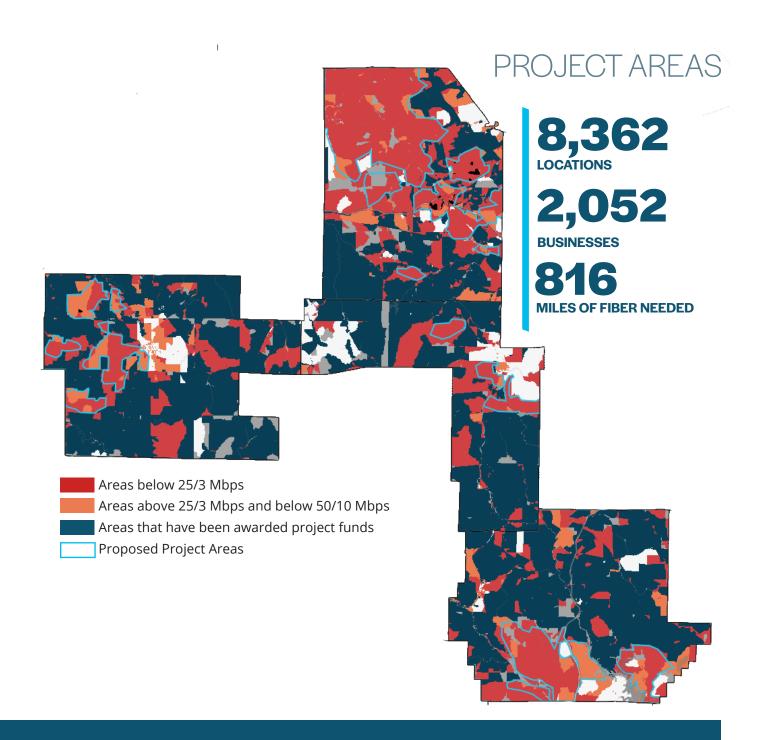
# Dent / Iron / Washington / Wayne \_\_\_\_\_\_\_Project Cluster • Meramec - Ozark Foothills- Southeast Missouri **Regional Planning Commissions**

# PLANNING CONSIDERATIONS



# Dent / Iron / Washington / Wayne \_\_\_\_

# Project Cluster • Meramec - Ozark Foothills- Southeast Missouri Regional Planning Commissions



# Investment Range = \$73.7 - \$162 million<sup>†</sup>

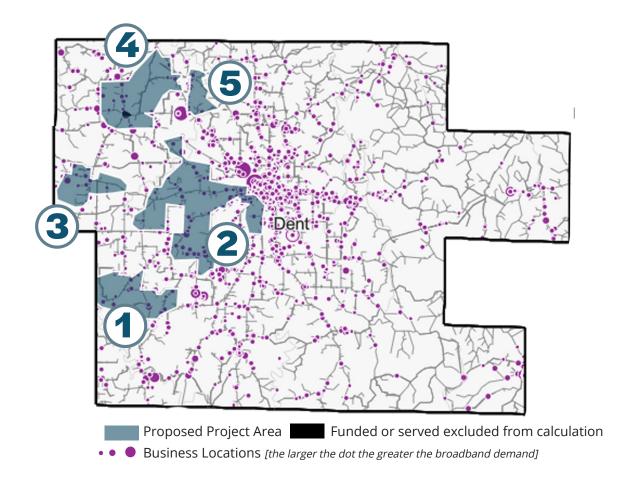
\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the <u>Appendix 1 and 2</u>.

† The Investment range for this cluster area may be lower; due to carrier electing to participate in E-ACAM that can impact eligibility for BEAD funding

#### DENT COUNTY\_

# PROJECT AREAS

While most of Dent County outside of Salem is unserved or underserved, much of that territory is funded-to-served via multiple existing grant awards. In the eastern half of the county, the blocks that remain unserved and unfunded contain mostly locations that are on roads that are part of existing award boundaries. These locations, while technically eligible for funding, are likely to be served as part of the existing funded deployment. In the west, we identified 5 project areas. Although these areas also are surrounded by existing awards, the population is distributed more evenly with many locations far enough away from boundary roads to merit applying for funding.





\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the <u>Appendix 1 and 2</u>.

# **DENT COUNTY**

# PROJECT DETAILS







# **DENT COUNTY**

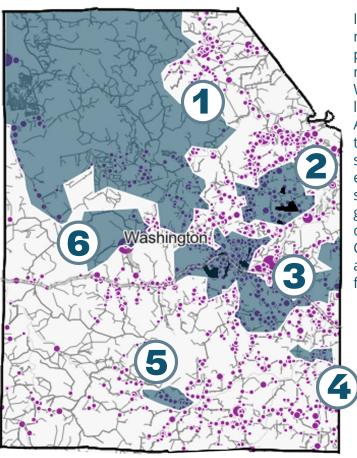
# PROJECT DETAILS





#### WASHINGTON COUNTY.

# PROJECT AREAS



In Washington County, the largest areas of need are in the northwestern and east-central parts of the county. Most of the southern and northeastern blocks are already funded-to-served. We identified 6 potential project areas, with the largest encompassing most of the northwest. Area #3, which includes Potosi, and area #2 to the northeast of Potosi both include multiple small existing award areas. Those locations were excluded from our budget calculations. The smaller areas in the south were designed to fill gaps between existing award territories. Given the overall patchwork nature of awards in Washington County, it is hard to predict whether existing awardees will apply for funds to expand their footprint or challenge competing applications.

Proposed Project Area Funded or served excluded from calculation

• • Business Locations [the larger the dot the greater the broadband demand]

498 fiber miles

5,365 locations

1,521 business locations

10.8 locations per mile

**INVESTMENT** = \$44.3 - \$97.3 million

\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the <u>Appendix 1 and 2</u>.

# **WASHINGTON COUNTY\_**

# PROJECT DETAILS

\*This project area may be partially impacted by E-ACAM Carrier participation, and some locations may not be eligible for BEAD funding. AFRIAL UNDERGROUND \$25.9M-\$34.6M \$33.9M - \$56.9M **COST TO PASS** \$1.5M - \$6M ISP INVESTMENT \$1.5M - \$6M \$19.9M - \$33.1M **FUNDING GAP** \$27.M - \$55.4M annual cost per location \$443-\$738 \$621-\$1,234 over 30 years

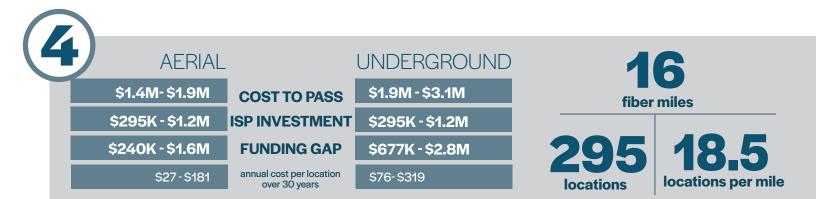
**AERIAL** UNDERGROUND \$3.9M-\$5.2M \$5.1M - \$8.5M **COST TO PASS** fiber miles \$592K - \$2.4M **ISP INVESTMENT** \$592K - \$2,4M \$1.5M - \$4.6M **FUNDING GAP** \$2.7M - \$7.9M annual cost per location \$84-\$258 \$151-\$445 over 30 years locations per mile



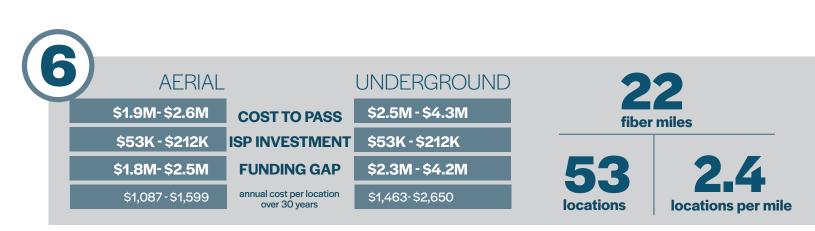
<sup>\*</sup>In this area, density is high enough that an ISP may be willing to deploy with no subsidy.

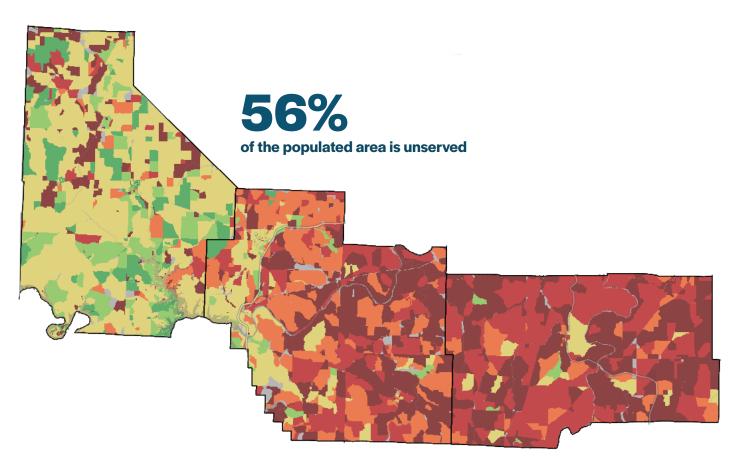
# WASHINGTON COUNTY\_

# PROJECT DETAILS



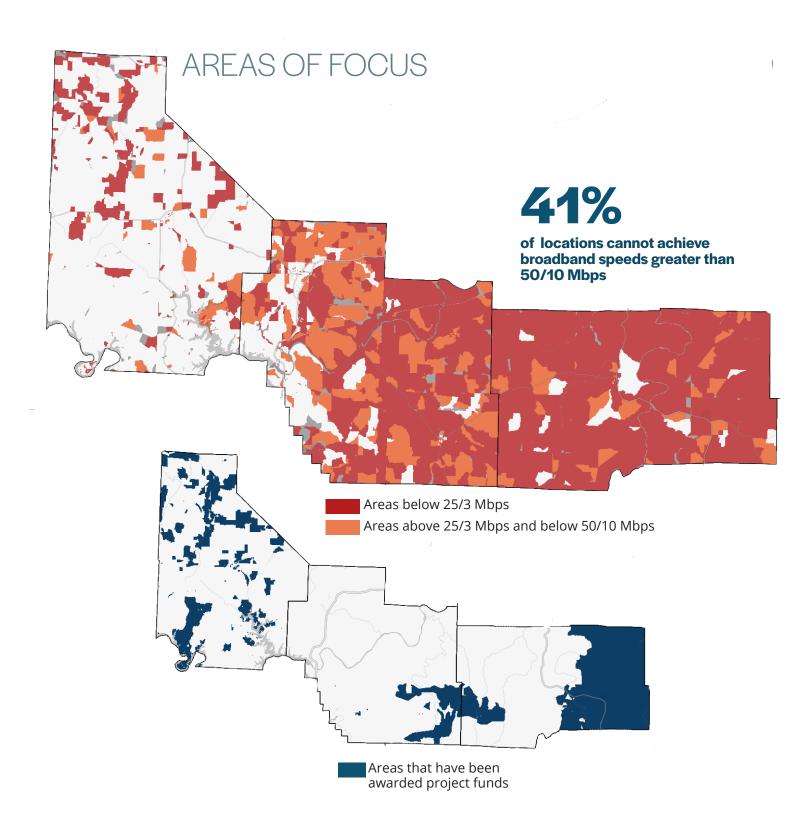


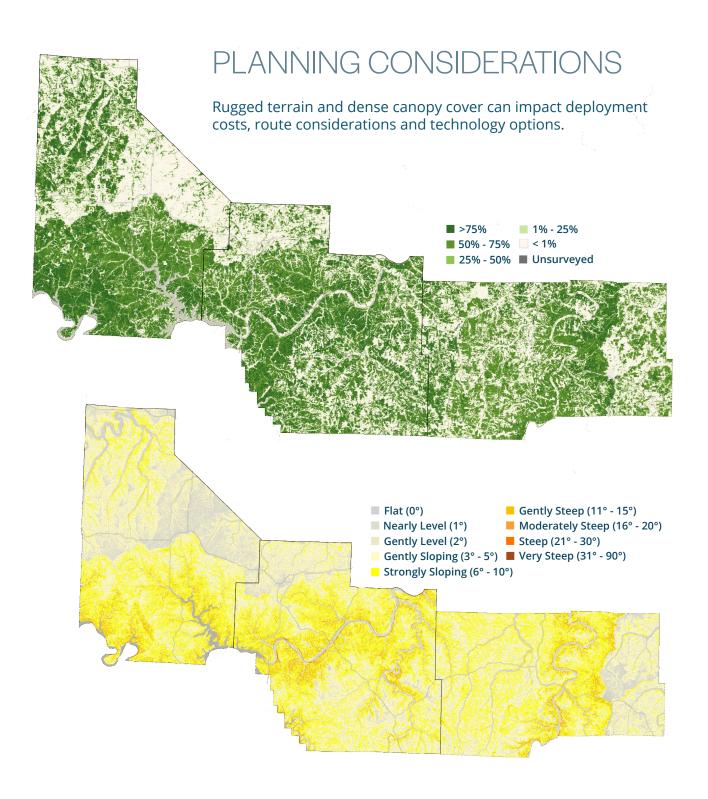




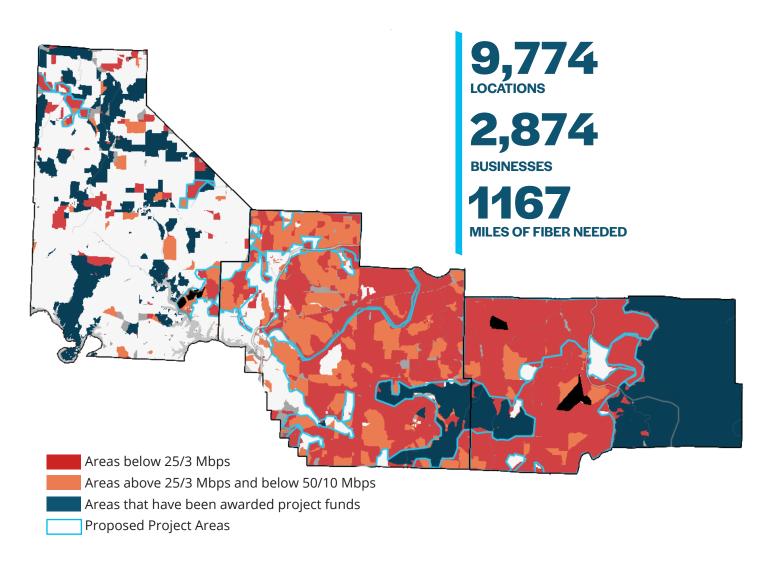








## PROJECT AREAS



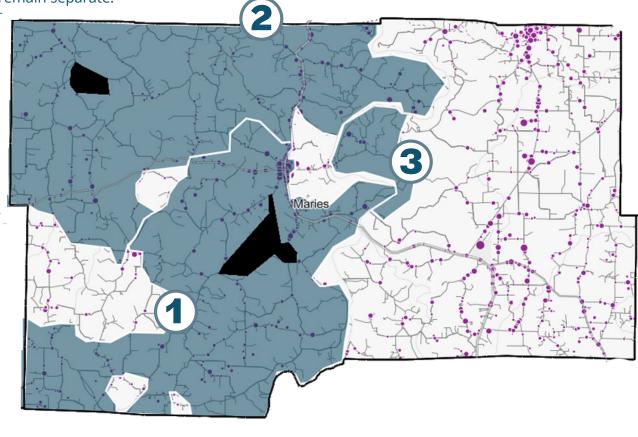
# Investment Range = \$104 - \$228.7 million

\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the Appendix 1 and 2.

#### **MARIES COUNTY**

#### PROJECT AREAS

Except for a handful of blocks that rate above 50/10 Mbps, all of Maries County currently is unserved or underserved. Most of the county east of the Gasconade River has already received grant funding. In the west, a few awards will address some of the need; however, large areas remain unserved and unfunded. We divided this territory into 3 project areas. The two larger areas could be combined into a single project; however, depending on the presence or absence of existing river crossings, project 3 may need to remain separate.



Proposed Project Area Funded or served excluded from calculation

Business Locations [the larger the dot the greater the broadband demand]

317 fiber miles

**2,578**locations

**597** business locations

8\_1
locations per mile

**INVESTMENT** = \$28.2 - \$62.1 million

\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the <a href="Appendix 1">Appendix 1</a> and 2.

# **MARIES COUNTY**

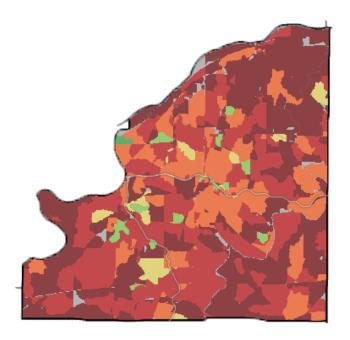
# PROJECT DETAILS



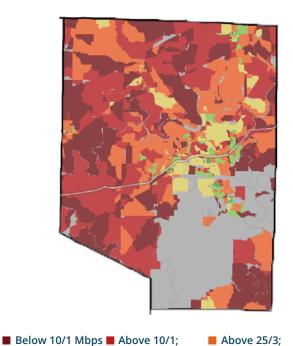




# Pulaski / Osage \_\_\_\_\_ Add-on Technical Assistance • Meramec Regional Planning Commission



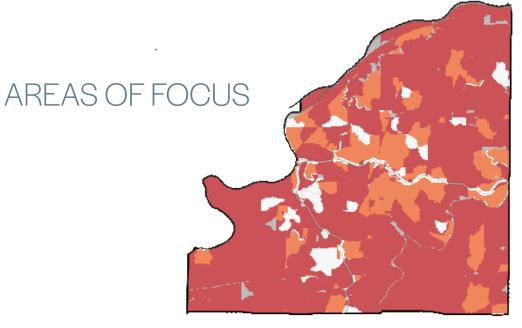
**65%** of the populated area is unserved



null / no data

locations cannot achieve speeds greater than 25/3 Mbps

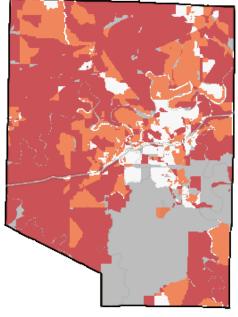
# Pulaski / Osage \_\_\_\_\_\_ Add-on Technical Assistance • Meramec Regional Planning Commission



**79%** 

of locations cannot achieve broadband speeds greater than 50/10 Mbps





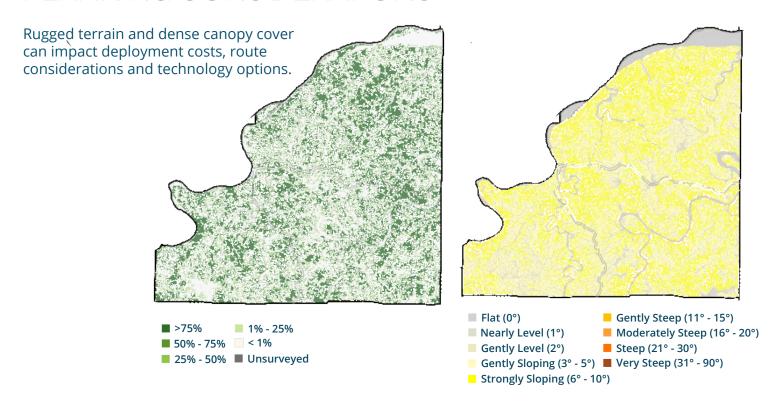
Areas below 25/3 Mbps Areas above 25/3 Mbps and below 50/10 Mbps

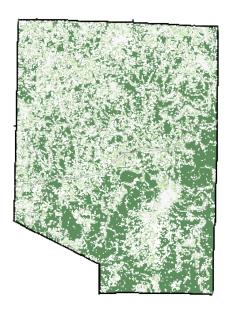


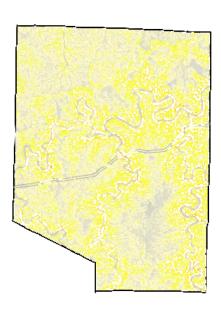
Areas that have been awarded project funds

# 

# PLANNING CONSIDERATIONS

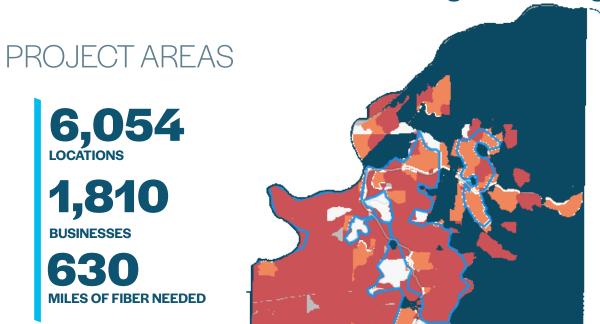




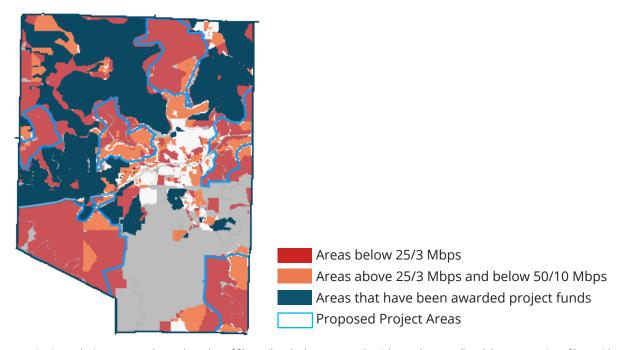


# Pulaski / Osage \_\_\_\_

Add-on Technical Assistance • Meramec Regional Planning Commission



# Investment Range = \$32.4 - \$49.6 million



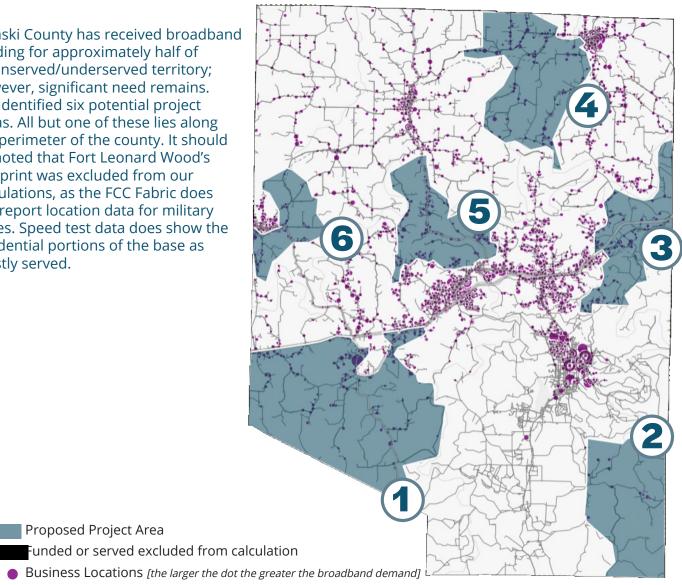
\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the <a href="Appendix 1">Appendix 1</a> and 2.

# **PULASKI COUNTY**

# PROJECT AREAS

Pulaski County has received broadband funding for approximately half of its unserved/underserved territory; however, significant need remains. We identified six potential project areas. All but one of these lies along the perimeter of the county. It should be noted that Fort Leonard Wood's footprint was excluded from our calculations, as the FCC Fabric does not report location data for military bases. Speed test data does show the residential portions of the base as mostly served.

Proposed Project Area



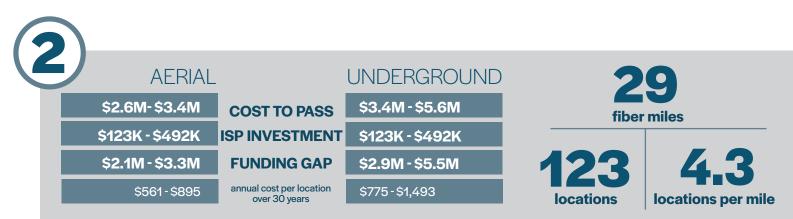
fiber miles INVESTMENT = \$24.6 - \$54 million

\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the Appendix 1 and 2.

# **PULASKI COUNTY**

# PROJECT DETAILS







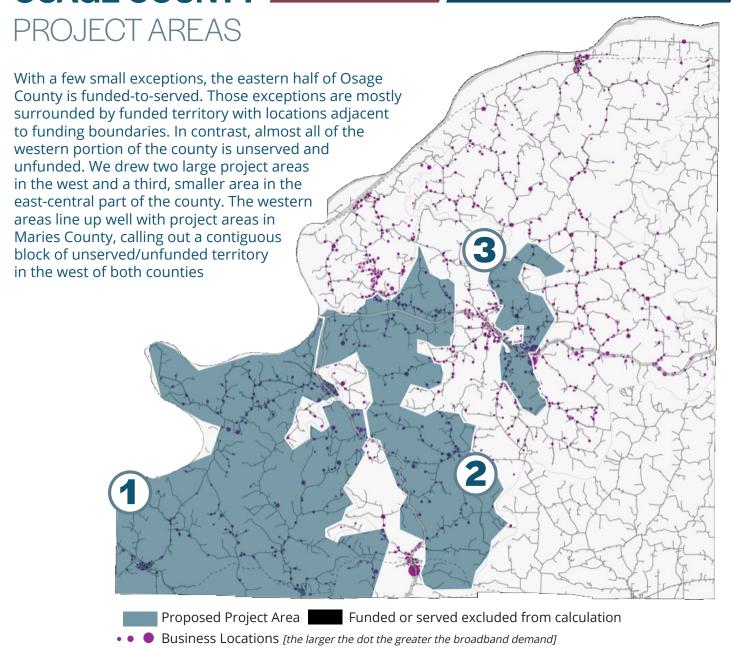




\*In this area, density is high enough that an ISP may be willing to deploy with no subsidy.



#### **OSAGE COUNTY**



354 2,675 881 7.6 locations | 10 loc

\*Investment projections take into account the total number of fiber miles, deployment type [aerial or underground] and the computation of low, mid and high project cost. A full explanation of our methodology and calculation tables can be found in the <a href="Appendix 1">Appendix 1</a> and 2.

# **OSAGE COUNTY**

# PROJECT DETAILS







#### **APPENDIX 1**

#### **Broadband Mapping and Methodology**

#### ABOUT THE MAPPING

Statewide, Regional, and County profiles were created under contract by Reid Consulting Group, LLC. for Missouri Association of Councils of Government (MACOG).

Broadband coverage maps are based on a rating system developed by Reid Consulting Group, LLC. Data sources include Ookla Speedtest Intelligence® data licensed by MACOG for the months of December 2020 through December 2023, carrier filings of available speeds with the FCC Fabric, carrier reports of actual broadband deployments to USAC (HUBB), RDOF Phase 1 eligibility, and population density.

Unserved and underserved ratings are color coded at the census block and block group level:

- Dark Red: Below 10/1 Mbps
- Red: Above 10/1; Below 25/3 Mbps
- Orange: Above 25/3; Below 50/10 Mbps
- Yellow: Above 50/10; Below 100/20 Mbps
- Light Green: Above 100/20; Below 200/50 Mbps
- Green: Above 200/50 Mbps
- Grey: Areas with no data/ speedtests submitted / no population

We conducted analysis of the raw Ookla® data for the months of December 2020 through July 2023, applying the following filters:

#### **Filter**

Include desktop, iOS, and Android app results\*

Exclude results with GPS precision of greater than 200 meters\*\*

Include only results from fixed broadband providers

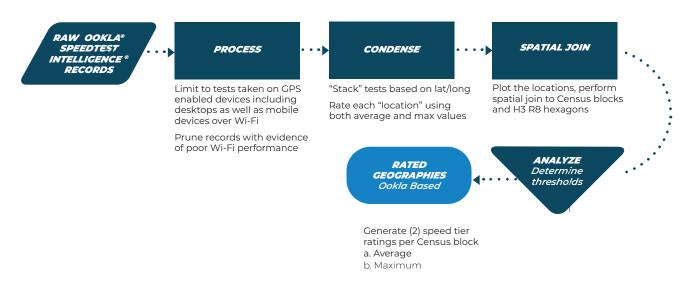
<sup>\*</sup>iOS and Android results were included only if the device was connected to wi-fi during the speed test.

\*\* To protect consumer privacy, Ookla® limits location precision to +/-100 meters. As a result, a single location may include multiple households and many individual tests.

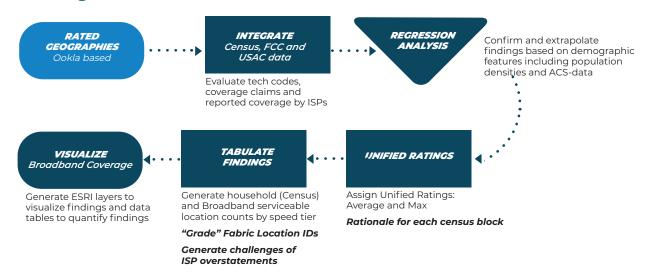
#### ANALYZING THE DATA

Using the Ookla® results we rated each location based on the maximum of up/down speeds for all tests at that location. We then graded census blocks based on the median up/down rating of all locations within each block. Block-by-block ratings were further refined based on RDOF eligibility, past HUBB deployments, and Form 477/ Fabric availability data. For blocks with no Ookla test results, extrapolated ratings were assigned where possible via comparative analysis of population density, block group ratings, FCC Fabric, HUBB data, and RDOF Phase 1 awards. Areas that could not be assigned an extrapolated rating are shown in gray on the map.

#### **Generating Speed Ratings**



#### **Layering Additional Data Sources**



#### BUSINESS BROADBAND OPPORTUNITY INDEX

Business demand for broadband varies based on company size and economic sector. The more employees at any given business location, the greater the demand will be for that location. Certain types of businesses also tend to consume more bandwidth regardless of size. For example, a medical clinic with 50 employees will need significantly more capacity than a construction contractor of similar size.

When planning for broadband expansion, it is important to consider the effect businesses have on overall need. The presence of a high-demand business or multiple businesses of any size in a particular area may make that area significantly more attractive to a broadband provider than the surrounding population density would predict.

The Business Broadband Opportunity Index helps planners visualize this economic impact by mapping the location of every business (as identified by Dun & Bradstreet) with a dot size proportional to that business' expected broadband demand. The larger the dot, the greater the demand. Calculations are as follows:

#### OPPORTUNITY INDEX = BUSINESS SIZE \* INDEX MULTIPLIER

#### **Business Size**

Number of employees as reported in Dun & Bradstreet. If count is blank, assume 1 employee.

#### **Index Multiplier**

A number from 1-5 based on industry sector.

#### On the Map

The greater the demand, the bigger the dot. To aid with visualization, comparative rankings from 1 to 10 are also assigned.

CategoryMultiplierHealthcare5Education & Libraries5Telecom and IT5Banking and Finance5Professional Services4Publishers4Real Estate3Hospitality3Non-Profit3Wholesalers2Dealers and Retail2Transportation2Childcare2Sports, Music & Arts2Religious and Fraternal2Manufacturing2Printing2Restaurants & Food2Farming1Hunting, Fishing1Energy1Raw Materials1Contractors1Textiles1
Education & Libraries Telecom and IT Banking and Finance Professional Services 4 Publishers Real Estate Hospitality Non-Profit Wholesalers Dealers and Retail Transportation Childcare Sports, Music & Arts Religious and Fraternal Manufacturing Printing Restaurants & Food Farming Hunting, Fishing Energy Raw Materials Contractors  5  Childcare Chil
Unclassified 1

# **APPENDIX 2**

#### **Budget Projections**

The budget is based on a fiber-to-the-home network with enough capacity to meet demand for the next 30 years. Expected investments and the funding gap will vary based on the area to be served, the population density, and the presence or absence of other services.

#### **COST ESTIMATES**

#### **Investment Range**

The Project Cluster Investment Range represents the lowest cost to the highest cost of to serve the total number of locations that are identified as below 50/10 Mbps the entire County Cluster. In most cases the lowest cost represents aerial fiber deployment and the highest cost represents underground fiber deployment. For the individual counties, it is the average of the lowest and cost of each project area.

The total cost for each project area is the sum of make-ready and cost-to-pass multiplied by the number of unserved state, county, township, and unincorporated road miles.

Unserved Miles \* (Make-Ready + Cost-to-Pass) + (Number of locations \* Network electronics)

Fiber Miles to Reach Target \* Cost per Mile = Cost to Pass

#### **ISP Investment**

This is the total an internet provider can spend to install fiber and still make a profit, estimated between \$1000 and \$4000 per household. As population density goes down, costs go up while expected investment remains the same.

Households in Service Area \* Investment per household

#### **Funding Gap**

The funding gap is the difference between the total cost of the project and the available or anticipated private investment. For an internet service offering to be sustainable, grant or other public funding must be used to close this gap.

Funding Gap = Total Projected Cost - ISP Investment

#### **30 Year Annual Cost**

The 30 year amortized gap per household is calculated by dividing the funding gap by 30, then dividing the resulting figure by the total number of locations in the project area.

Gap per location = (Funding Gap ÷ Number of households) ÷ 30 years

#### **Fiber Miles**

Fiber distance is based on the number of unserved state, county, local municipal and unincorporated road miles within the county.

#### **Locations per Mile**

Total number of unserved households divided by the number of unserved state, county, township, and unincorporated road miles.

# APPENDIX 3

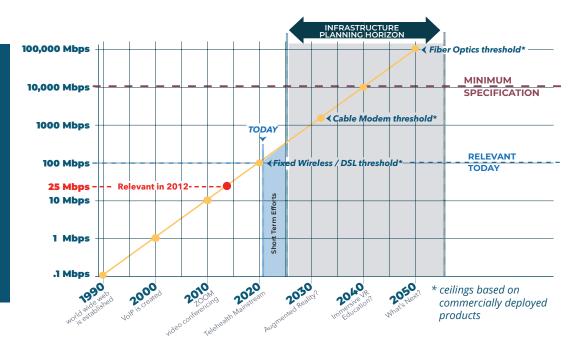
# **Planning for the Future**

#### BUILDING FOR THE FUTURE

For planning purposes, broadband deployments must be treated like infrastructure projects. Much like water, sewer, and roads, broadband networks should be designed to last decades rather than years. Networks installed today should utilize technologies, materials, and design specifications that will deliver 30-to-40-year longevity. Networks also should have sufficient capacity to meet not only current needs but also those of 2055.

Given the capital costs and construction requirements for broadband, we recommend a planning window that starts in 2025 and continues through 2055. This timeline assumes a three to four year deployment window which will vary based on project size, supply chain complexities and labor availability.

Since the web was invented in 1990, broadband demand has increased ten-fold every decade.



When home internet first became common, most households connected using landline modems that operated at 56 Kbps (0.056 Mbps). By 2000, speeds had increased to 1 Mbps. A decade later, a well-served household could expect 10 Mbps. The FCC's current 25/3 Mbps threshold was last relevant in 2012, when the average download speed reached 25 Mbps. Currently, someone living in a well-served area can expect at least 100 Mbps down/20 Mbps up.

With remote work and learning, telehealth, and virtual reality quickly becoming mainstream, it is not difficult to imagine the average speed reaching 1,000 Mbps (1 Gbps) ten years from now. In fact, many internet providers already offer 1 Gbps and 2 Gbps plans with business connections and some residential connections routinely operating at 10 Gbps. Some backbone and middle mile networks already operate on 100 Gbps and 400 Gbps connectivity.

# **APPENDIX 4**

#### **Challenge Process**

Reid Consulting Group filed multiple rounds of FCC bulk challenges on behalf of MACOG. These challenges included addresses from across the state and targeted exaggerated claims from DSL providers and licensed fixed wireless carriers. Justification for these challenges combined knowledge of existing infrastructure with statistical analysis of crowdsourced speed test data. Because the FCC does not consider speed test data alone to be a valid basis for challenge, we cited our speed test analysis only as corroborating evidence to our primary infrastructure arguments. Those arguments were as follows:

#### **DSL Cable Plant in Disrepair**

DSL service, not only in rural Missouri but also across the rest of rural America, is delivered via twisted pair copper telephone cables that were originally installed in the 1940s-1960s. Most of those cables remain in service today. When delivered over well-maintained lines, DSL is capable of delivering reliable broadband service; however, almost all of our country's landline copper telephone cables are 50+ years old. With a useful lifespan of just 30 years, those cables are no longer to deliver reliable telephone service, let alone broadband.

Based on the decrepit condition of the country's twisted pair landline infrastructure, we challenged any location where a DSL provider claimed speeds above 25/3 Mbps.

#### **Speed Rating Threshold**

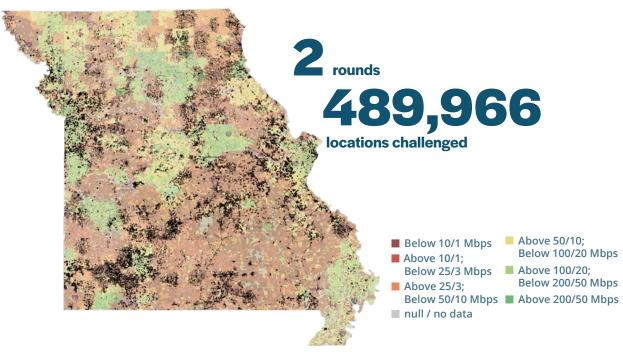
For all technologies, we only challenged locations where our maps showed speeds were below 25/3 Mbps and carrier claims were at least two speed tiers higher. For example, in our first round of fixed wireless challenges, we challenged nearly 48,000 locations that were claimed to be between 100/20 and 200/50 Mbps but which tested below 25/3 Mbps. An additional 27,000+ locations had no test results above 10/1 Mbps. The FCC does not accept this sort of analysis as a challenge justification. We included the data with our challenges anyway, to provide corroboration of our primary justifications and to ensure that the stark difference between carrier claims and citizen reality was documented in public record via the FCC Docket.

#### **Fixed Wireless not a Mass Market Solution**

Fixed wireless providers have significantly overstated their technology's geographic coverage and its ability to provide speeds above 100/20 Mbps at mass market takerates. Our bulk challenge justification cited two specific justifications:

Overly optimistic signal propagation model: Fixed wireless carriers draw a 5-mile radius around each of their macro-towers and claim to offer 100/20 (or in some cases, gigabit speeds) to every location within that radius. Because fixed wireless requires line-of-sight transmission, such coverage is possible only in flat terrain. In hilly areas, particularly the steep terrain of the Ozarks, many subscribers will be unable to "see" a fixed wireless tower. To demonstrate just how widespread this problem can be, we conducted detailed, multi-tower viewshed analyses of multiple areas in the state, each representative of the kind of terrain found in that part of the state. Our analysis showed that even moderately rolling terrain included at least some signal shadows. In steep terrain, more locations were without signal than with. To make matters worse, frequencies above 3 GHz are readily absorbed by the water in tree leaves. These microwave band frequencies are now the most popular fixed wireless frequencies, in part because as frequencies rise, so does theoretical data capacity. With much of the southern part of the state heavily forested, signal attenuation makes fixed wireless even less viable.

**Limited bandwidth on macro sites:** Even if signal propagation were not an issue, bandwidth still would be a problem. For fixed wireless to be a mass-market solution, it must be able to support speeds of at least 100/20 Mbps for 80% of the locations within its coverage radius. Small cell wireless technology is capable of meeting this standard, but all of the providers in Missouri are using only macro towers. For macro-tower fixed wireless, all customers share bandwidth on the same transceiver or, in the best case, on a handful of directional transceivers that divide that tower's territory into quadrants. These transceivers are capable of delivering 100/20 Mbps to a small number of subscribers simultaneously, but if hundreds of subscribers were to connect at the same time, that tower's limited bandwidth would quickly be oversubscribed.



# STATEWIDE CHALLENGES

ISP Reported	Max observed	Rating Delta	<b>Location Count</b>	Challenge Statu
6, Above 200/50	1, Below 10/1	5	1,243	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	2,776	Challenged
5. Above 100/20; Below 200/50	1, Below 10/1	4	27,545	Challenged
5. Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	47,880	Challenged
4. Above 50/10; Below 100/20	1, Below 10/1	3	6,109	Challenged
4. Above 50/10; Below 100/20	2, Above 10/1; Below 25/3	2	15,658	Challenged
3. Above 25/3; Below 50/10	1, Below 10/1	2	60,546	Challenged
3. Above 25/3; Below 50/10	2, Above 10/1; Below 25/3	1	124,639	Not Challenged
	Locations with a Rating Delta of 2	2 or higher	161,757	Challenged
	Locations with a Rating Delta of 3	1	124,639	Not Challenge

ISP Reported	Max observed	Rating Delta	<b>Location Count</b>	<b>Challenge Statu</b>
6, Above 200/50	1, Below 10/1	5	1,182	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	2,537	Challenged
5. Above 100/20; Below 200/50	1, Below 10/1	4	26,302	Challenged
5. Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	44,930	Challenged
4. Above 50/10; Below 100/20	1, Below 10/1	3	2,727	Challenged
4. Above 50/10; Below 100/20	2, Above 10/1; Below 25/3	2	7,741	Challenged
3. Above 25/3; Below 50/10	1, Below 10/1	2	43,362	Challenged
3. Above 25/3; Below 50/10	2, Above 10/1; Below 25/3	1	92,144	Not Challenged
	Locations with a Rating Delta of 2	2 or higher	128,781	Challenged
	Locations with a Rating Delta of 3	1	92,144	Not Challenged

ISP Reported	Max observed	<b>Rating Delta</b>	<b>Location Count</b>	<b>Challenge Statu</b>
6, Above 200/50	1, Below 10/1	5	61	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	239	Challenged
5. Above 100/20; Below 200/50	1, Below 10/1	4	1,243	Challenged
5. Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	2,950	Challenged
4. Above 50/10; Below 100/20	1, Below 10/1	3	3,382	Challenged
4. Above 50/10; Below 100/20	2, Above 10/1; Below 25/3	2	7,917	Challenged
3. Above 25/3; Below 50/10	1, Below 10/1	2	17,184	Challenged
3. Above 25/3; Below 50/10	2, Above 10/1; Below 25/3	1	32,495	Not Challenged
	Locations with a Rating Delta of 2	2 or higher	32,976	Challenged
	Locations with a Rating Delta of 1	L	32,495	Not Challenged

ISP Reported	Max observed	Rating Delta	Location Count	Challenge Statu
6, Above 200/50	1, Below 10/1	5	31,510	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	29,801	Challenged
6, Above 200/50	3, Above 25/3; Below 50/10	3	68,770	Challenged
5, Above 100/20; Below 200/50	1, Below 10/1	4	44,655	Challenged
5, Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	46,371	Challenged
5, Above 100/20; Below 200/50	3, Above 25/3; Below 50/10	2	51,870	Challenged
4, Above 50/10; Below 100/20	1, Below 10/1	3	6,136	Challenged
4, Above 50/10; Below 100/20	2, Above 10/1; Below 25/3	2	7,681	Challenged
3, Above 25/3; Below 50/10	1, Below 10/1	2	41,415	Challenged
3, Above 25/3; Below 50/10	2, Above 10/1; Below 25/3	1	48,398	Not Challenged
3, ABOVE 23/3, BEIOW 30/10	2, Above 10/1, Below 25/5	1	70,330	140t Chanenge
			328,209	Challenged
			48,398	Not Challenged

ISP Reported	Max observed	Rating Delta	Location Count	Challenge Status
6, Above 200/50	1, Below 10/1	5	810	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	2,450	Challenged
5, Above 100/20; Below 200/50	1, Below 10/1	4	30,521	Challenged
5, Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	30,065	Challenged
4, Above 50/10; Below 100/20	1, Below 10/1	3	3,673	Challenged
4, Above 50/10; Below 100/20	2, Above 10/1; Below 25/3	2	3,420	Challenged
3, Above 25/3; Below 50/10	1, Below 10/1	2	25,400	Challenged
3, Above 25/3; Below 50/10	2, Above 10/1; Below 25/3	1	26,683	Not Challenged
			96,339	Challenged
			26,683	Not Challenged

ISP Reported	Max observed	Rating Delta	Location Count	Challenge Status
6, Above 200/50	1, Below 10/1	5	497	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	774	Challenged
5, Above 100/20; Below 200/50	1, Below 10/1	4	921	Challenged
5, Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	1,531	Challenged
4, Above 50/10; Below 100/20	1, Below 10/1	3	2,463	Challenged
4, Above 50/10; Below 100/20	2, Above 10/1; Below 25/3	2	4,261	Challenged
3, Above 25/3; Below 50/10	1, Below 10/1	2	16,015	Challenged
3, Above 25/3; Below 50/10	2, Above 10/1; Below 25/3	1	21,715	Not Challenged

ISP Reported	Max observed	<b>Rating Delta</b>	<b>Location Count</b>	Challenge Status
6, Above 200/50	1, Below 10/1	5	24,189	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	18,746	Challenged
6, Above 200/50	3. Above 25/3; Below 50/10	3	45,664	Challenged
5. Above 100/20; Below 200/50	1, Below 10/1	4	1,925	Challenged
5, Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	2,074	Challenged
5, Above 100/20; Below 200/50	3. Above 25/3; Below 50/10	2	5,861	Challenged

ISP Reported	Max observed	Rating Delta	Location Count	Challenge Status
6, Above 200/50	1, Below 10/1	5	6,014	Challenged
6, Above 200/50	2, Above 10/1; Below 25/3	4	7,831	Challenged
6, Above 200/50	3. Above 25/3; Below 50/10	3	23,106	Challenged
5. Above 100/20; Below 200/50	1, Below 10/1	4	11,288	Challenged
5, Above 100/20; Below 200/50	2, Above 10/1; Below 25/3	3	12,701	Challenged
5, Above 100/20; Below 200/50	3. Above 25/3; Below 50/10	2	46,009	Challenged

# REGIONAL CHALLENGES BY COUNTY: ROUND 2

ovider Claimed Speed	Above 25/3; Belo		Above 50/10;	Abrus 10/1		00/20; Below 2			Above 200/50	Ahay ar is	
aximum Speed Test at Location	Below 10/1	Above 10/1; Below 25/3	Below 10/1	Above 10/1; Below 25/3		Above 10/1; Below 25/3	Above 25/3; Below 50/10	Below 10/1		Above 25/3; Below 50/10	Grand T
Crawford County	473		89	127	139	220	351	7	37	101	
Cable Charter Communications Inc					30	47	<b>329</b> 315				
Fidelity					30	46 1	14			}-	
DSL	402		3	3							
Brightspeed	172	Marana and a second	3	3					}		
Fidelity Telephone LLC Steelville Telephone Exchange, Inc.	40 190										
eth	190				2	4	22	7	37	101	
Charter Communications Inc		0 · · · · · · · · · · · · · · · · · · ·			2	4	21			1	
Sho-Me Technologies, LLC								1			
Steelville Telephone Exchange, Inc. Fixed Wireless	71	38	96	124	107	169	1	6	37	100	
BlueBit Networks	44		<b>86</b> 70	112	21	13	{-				
T-Mobile US	20				2						
Wisper ISP, LLC	7			12	84	156					
Dent County	200	8	5	1	198	176	851				
Cable Fidelity					<b>58</b> 58	<b>72</b> 72	<b>851</b> 851				
DSL	144		5	1	36	/2					
Brightspeed	125		5	1							
Steelville Telephone Exchange, Inc.	19	(nonconomonomonomono)									
Fixed Wireless	56	O			140	104					
UNITED STATES CELLULAR CORPORATION Wisper ISP, LLC	44 12				12 128	104	}		}		
Gasconade County	401		1	2	16	15	أكري	35	183	330	
Cable								5	11	40	
MCC Missouri LLC								5	11	40	
DSL Brightspeed	<b>359</b> 230		1 1	2			}		}	}	
Brightspeed Fidelity Telephone LLC	129		1								00000000
Fiber	123				1			30	172	290	
Brightspeed					1						
Callabyte								18	35	40	
Fidelity								12	3	7	
Fidelity Telephone LLC  Fixed Wireless	42				15	15		12	134	243	
T-Mobile US	33				15	15					~~~~~
UNITED STATES CELLULAR CORPORATION	2										
VERIZON	7										
Maries County	262		18	43	682	780		6			
<b>DSL</b> Brightspeed	<b>224</b> 218		<b>18</b> 13	<b>43</b>	6	38		4	37		
Windstream Missouri, Inc.	6		5	40	6	38		4	37		
Fiber								2			
GTECH Fiber LLC	·							1			
Sho-Me Technologies, LLC								1			
Fixed Wireless UNITED STATES CELLULAR CORPORATION	<b>38</b> 21			~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	<b>676</b> 5	742					
Windstream Missouri, Inc.	5				7						
Wisper ISP, LLC	12	23			664	742					
Osage County	236	33	11	8	603	682		131	256	553	
Cable					1			129	254	548	
Cable America Optimum					1		}	129	254	548	
DSL	123	· · · · · · · · · · · · · · · · · · ·	11	8	1	•••••••••••••••••••••••••••••••••••••••					
AT&T Inc	<del>-</del> -				1					····	
Brightspeed	123		11	8							
Fiber Mid MO Micro Computers						1		2	2	5	
Mid MO Micro Computers Sho-Me Technologies, LLC						1		2	2	5	
Fixed Wireless	113	33			601	681					
UNITED STATES CELLULAR CORPORATION	47				14						
VERIZON	48				4						
Wisper ISP, LLC	18 839			-22	583	681 1137	1675	354	260	204	
Phelps County Cable	839	124	59	33	937 330	1137 586	1675 1674	251 165	360 225	294 206	
Cable America	<u> </u>				208	421	484	165	225	206	
Charter Communications Inc	,	(			31	39	133				
Fidelity					91	126	1057				
DSL Brightspeed	<b>414</b> 414		<b>1</b> 1	<b>3</b>	2	4		1	2		
Windstream Missouri, Inc.	414		1	1	2	4	}	1	2		
Fiber						4 1	1	1 85	133	88	
Brightspeed									1	1	
Charter Communications Inc						1	1				
Fidelity										1	
GTECH Fiber LLC Socket Telecom, LLC								79 5	129 2	47	~~~~~
								1	1	39	
		124	58	30	605	546					
Steelville Telephone Exchange, Inc. Fixed Wireless	425	127	J0.								
Steelville Telephone Exchange, Inc. Fixed Wireless BlueBit Networks	15	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	49		19	9					
Steelville Telephone Exchange, Inc. Fixed Wireless BlueBit Networks T-Mobile US	15 137	59		21	19 27						
Steelville Telephone Exchange, Inc. Fixed Wireless BlueBit Networks	15	59			19	9					

Provider Claimed Speed	Above 25/3; Belo	w 50/10	Above 50/10;	Below 100/20	Above	100/20; Below	200/50		Above 200/50		
Maximum Speed Test at Location	Below 10/1	Above 10/1; Below 25/3	Below 10/1	Above 10/1; Below 25/3	Below 10/1	Above 10/1; Below 25/3	Above 25/3; Below 50/10	Below 10/1	Above 10/1; Below 25/3	Above 25/3; Below 50/10	Grand Total
Pulaski County	325	91	13	87	537	1084	8	374	1225	4197	7941
Cable								336	1091	4089	5516
Cable America								336	1091	4089	5516
DSL	124		12	86	16	117		35	79		469
Brightspeed	119										119
Windstream Missouri, Inc.	5		12	86	16	117		35	79		350
Fiber						2	8	3	55	108	176
Brightspeed						2	8			1	11
GTECH Fiber LLC								2	29	81	112
Windstream Missouri, Inc.								1	26	26	53
Fixed Wireless	201	91	1	1	521	965					1780
T-Mobile US	49				16	7					72
UNITED STATES CELLULAR CORPORATION	105				20						125
VERIZON	6										6
Windstream Missouri, Inc.	12			1	4						17
Wisper ISP, LLC	29	91	1		481	958					1560
Washington County	580	86	11	61	373	576	2	656	907	100	3352
Cable					4	22	2				28
Charter Communications Inc					4	22	2				28
DSL	565		10	15							590
Brightspeed	491		10	15							516
Fidelity Telephone LLC	54										54
Steelville Telephone Exchange, Inc.	20										20
Fiber								656	907	100	1663
yondoo Broadband, LLC								656	907	100	1663
Fixed Wireless	15	86	1	46	369	554					1071
BlueBit Networks	1	6	1	20	1	25					54
T-Mobile US	9	3		4	15	21					52
Wisper ISP, LLC	5	77		22	353	508					965
Grand Total	3316	403	207	362	3485	4670	2887	1460	3005	5575	25370

# **APPENDIX 5**

# Myths, Realities, and Responses

Successful broadband planning requires collaboration between governments, internet service providers, and consumers. Speed test analysis is an essential part of that collaboration, but some internet service providers may object that the maps are inaccurate. Some of these objections may cite common myths about speed testing, but others will be valid concerns. When sharing this report with providers, the following explanations can help steer the conversation toward collaboration.

MYTHS	Bad tests are because of poor Wi-Fi.	Residents only subscribe to low speed packages.	People only test when there is a problem.
REALITIES	Our analysis eliminates speed tests with weak Wi-Fi and includes tests from GPS-enabled wired devices.	According to NRECA, in areas where rural electric cooperatives offer broadband, 25% to 33% of rural subscribers opt for the top speed offered.	Network problems prompt tests, as do resolutions of problems. Sometimes the tests will show the network is working but a streaming service is slow. We focus on the maximum speed ever shown

#### **Problem: Network throttling**

When a provider limits subscriber bandwidth (e.g., 35 or 50 Mbps down instead of 100), then speed test maps will show those customers as underserved, even though the underlying technology can deliver much higher speeds.

#### Solution: Conduct max speed tests during installation and service calls

ISPs can improve their speed ratings by having their technicians conduct GPS-enabled Ookla speed tests as part of each customer premise visit. When installing new service or completing a repair, the technician should:

- Temporarily remove any bandwidth caps on the customer's account.
- Connect to the customer's wi-fi using a GPS-enabled iOS/Android device or plug directly into the fiber interface's Ethernet port using a GPS-enabled laptop.
- Using the Speedtest by Ookla app with precise location tracking enabled, conduct multiple tests to reveal the fastest speed available. Always use the Ookla app. The speedtest.net website does not gather precise enough location data.

This approach should not be considered "gaming the system." For grant planning purposes, it is important to document the highest practical speeds available in each area, even if an ISP does not routinely allow customers full access to those speeds.

#### **Problem: Mis-attributed IP address ranges**

Smaller ISPs sometimes purchase or lease their network address ranges from a middle mile provider. If those address ranges do not have the ISP's name associated with them, then those tests will be filtered out of the results as belonging to an infrastructure device instead of a home or business.

#### Solution: Update IP block ownership data

Ookla uses the Maxmind service to identify ISP network address owners. ISPs can update their address attribution by visiting maxmind.com and completing the form found under Correct a GeoIP ISP or Organization.

#### **Problem: Poor upload speeds**

Cable modem-based systems can support download speeds as fast as 2 Gbps, but they often struggle to deliver upload speeds above 10 Mbps. This is a fundamental limitation of the medium, especially for older cable TV networks.

#### **Solution: Network upgrade**

Cable companies can perform what is known as a "high split upgrade" that increases upload speeds for less than it would cost to deploy fiber. While this is not a long-term solution, it does help older cable plants to meet current federal minimums.

#### Problem: Recent upgrades not showing up

Because speed test data relies on organic consumer behavior patterns, test results can lag behind network changes, especially when a provider raises or removes a speed cap on its customers' accounts without notifying them.

#### Solution: Technician-conducted speed tests and customer test campaigns

If an ISP wants to see a more immediate reflection of recent changes to its existing network, they should add speed testing to their technicians' customer premise visit procedure. We also recommend encouraging customers to conduct their own speed tests. As noted above, these tes