

Application to DHCD Submitted through CAMS

CHARLES CITY COUNTY GOVERNMENT

Charles City County/Comcast District 3 Infrastructure

Application ID: 107412172023155249

Application Status: Pending

Program Name: Virginia Telecommunication Initiative 2024

Organization Name: CHARLES CITY COUNTY GOVERNMENT

Organization Address: 10900 COURTHOUSE ROAD
CHARLES CITY, VA 23030

Profile Manager Name: Abbey Pemberton

Profile Manager Phone: (804) 652-4705

Profile Manager Email: apemberton@charlescityva.us

Project Name: Charles City County/Comcast District 3 Infrastructure

Project Contact Name: Michelle Johnson

Project Contact Phone: (804) 652-4702

Project Contact Email: mjohnson@charlescityva.us

Project Location: 10900 COURTHOUSE RD
CHARLES CITY, VA 23030-3426

Project Service Area: Charles City County

Total Requested Amount: \$3,260,703.00

Required Annual Audit Status: Accepted

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Budget Information:

Cost/Activity Category	DHCD Request	Other Funding	Total
Telecommunications	\$3,260,703.00	\$4,119,561.00	\$7,380,264.00
Construction	\$1,780,558.00	\$2,249,550.00	\$4,030,108.00
Other: New Equipment Materials	\$299,156.00	\$377,953.00	\$677,109.00
Other: Engineering Design	\$34,171.00	\$43,172.00	\$77,343.00
Other: Permits Make Ready	\$1,115,326.00	\$1,409,099.00	\$2,524,425.00
Other: Survey	\$31,492.00	\$39,787.00	\$71,279.00
Total:	\$3,260,703.00	\$4,119,561.00	\$7,380,264.00

Budget Narrative:

The proposed Project represents a partnership between Comcast and the County. Comcast, the co-applicant, upon award of the VATI grant, will be responsible for any matching funds and will provide the labor and materials to complete the provision of services to the Project Area delineated in Attachment 16 – Point and Polygon Shapefiles. In addition, the County has been allocated \$2,643,508 in grant funding under RUS Reconnect for Congressionally Directed Spending projects. The estimated in-kind contribution by Charles City County is greater than \$200,000.00 and is valued based on salary and benefits of key leadership team members to include County Administrator, Assistant County Administrator and Finance Director.

Questions and Responses:

1. Project Description and Need

Describe why and how the project area(s) was selected. Describe the proposed geographic area including specific boundaries of the project area (e.g. street names, local and regional boundaries, etc.). Attach a copy of the map of your project area(s). Label map: Attachment 1 – Project Area Map.

Answer:

Charles City County (“County”) and Comcast Cable Communications, LLC (“Comcast”[\[1\]](#)) appreciate the opportunity to respond to the Commonwealth of Virginia’s Department of Housing and Community Development’s (“DHCD”) Virginia Telecommunication Initiative (“VATI”) with respect to deploying broadband infrastructure to eligible service areas in the County (“Project Area”). Comcast and the County propose to deploy qualifying broadband service to 399 [households](#) in the Project Area (the “Project”). The Project’s geographic area includes approximately 77 miles of infrastructure throughout the Comcast service area and other adjacent areas, which do not already have access to broadband service, as noted on the attached Project Area Map (Attachment 1) and further detailed below. The Project Area was selected based on a review of the Federal Communication Commission’s (“FCC”) Broadband Data Collection (“BDC”) and other publicly available information, and Comcast’s internal data. After consultation between the County and Comcast, the Project meets eligibility criteria established by the Virginia General Assembly and DHCD for a VATI award. Because VATI eligibility criteria is more restrictive than some federal programs, the Project also meets eligibility criteria for the Coronavirus State and Local Fiscal Recovery Fund (“SLFRF”) and the Capital Projects Fund (“CPF”) established under the American Rescue Plan Act of 2021 (“ARPA”). Comcast proposes to extend its network so that homes and businesses in the Project Area are serviceable with broadband speeds that reliably meet or exceed 100 Mbps download and at least 20 Mbps upload speeds **[Redacted]**. The proposed project will provide fiber-based internet infrastructure and service to Charles City County constituents in Voting

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District Three and service laterals for all structures that were not previously served. The focus on Voting District three is due in part to the areas limited implementation in FY20. The FY20 Charles City County VATI grant was able to partially implement broadband infrastructure via a Virginia Technology Initiative Grant in 2020 that excluded significant areas in Voting District Three. Additional project selection priorities included soliciting community engagement. The County has received many comments from citizens and businesses on the lack of broadband in certain areas of the County. Additionally, the County has worked to identify areas where broadband [service](#) is needed. This information led to the development of a broadband plan that identifies unserved areas of the County that should be targeted for internet service.

District Three is unserved based on data available through the Federal Communications Commission and Charles City County Census data. District Three is bounded by the James and Chickahominy Rivers, Adkins Road/State Route 618. It has the largest land area of the County's three voting districts, which made the cost per unit to service households in the district prohibitive for a prior grant award for fiber infrastructure deployment. The geographic area for this proposed project includes approximately 100 miles of infrastructure generally dispersed throughout Voting District Three of the County, as noted on the attached Project Area map. The area represents the largest of the three voting districts, hosting a population of 2,435, 58% representing minorities. The Project Area targets a significant portion of remaining locations that are currently unserved throughout the County. Comcast currently offers service to approximately **[Redacted]** premises in the County. The Project will greatly improve broadband coverage in the County, and funding for the two applications submitted by the County would provide near ubiquitous broadband coverage to County residents.

While the County understands that funding from the Broadband Equity, Access and Deployment ("BEAD") Program will be available in the future, speed of deployment is crucial for these residents. The proposed VATI Project could be completed within 18 months, providing broadband service and improving the quality of life for residents in this disadvantaged part of the County. The application also leverages ReConnect funds which were appropriated by Congress to support the expansion of broadband services in Charles City County. Inflation continues to decrease the value of that ReConnect grant, so the County is eager to leverage these funds to finally accomplish our goal of universal broadband service. An approved VATI grant will also accelerate the digital equity work of the Chickahominy tribe that is being supported by Comcast and Code VA. Comcast recently awarded \$25,000, provided 100 laptops, and installed a Lift Zone to support the Chickahominy Indian Tribe with free, high-speed WiFi to help its tribal citizens with digital literacy and skills training. These donations are part of Project UP, Comcast's \$1 billion commitment to advance digital equity through programs and community partnerships that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators. CodeVA, a Richmond-based non-profit that provides computer science education, and that also partners with the Virginia Tribal Education Consortium (VTEC), will use the \$25,000 grant to teach senior tribal citizens the digital literacy skills needed to stay connected and succeed in today's digital world.

Please see complete response to this question included as an optional attachment and labeled "VATI 2024 Application Charles City Project #2 Redacted, page # 3 .

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2. List existing providers in the proposed project area and the speeds offered. Describe your outreach efforts to identify existing providers and how this information was compiled with source(s).

Answer:

To the best of Comcast's and the County's collective knowledge and based on publicly available data and Comcast's internal database systems and tools, there are no existing providers of qualifying broadband in the Project Area to render any part of the Project Area ineligible for a VATI award. Comcast provides service to areas adjacent to the Project.

3. Describe if any areas near the project have received funding from federal grant programs, including but not limited to Connect America Funds II (CAF II), ACAM, ReConnect, Community Connect, and Rural Digital Opportunity Funds (RDOF). If there have been federal funds awarded near the project area(s), provide a map showing these areas, verifying the proposed project area does not conflict with these areas. Label Map: Attachment 2 – Documentation on Federal Funding Area.

Answer:

To the best of Comcast's and the County's knowledge, no areas within or immediately adjacent to the Project Area have received funding from federal grant programs such as CAF II, ACAM, RDOF, ReConnect, and Community Connect, as noted on Attachment 2 – Documentation on Federal Funding Area. [Charles](#) City County, with the support of Congressman McEachin, has been allocated \$2,643,508 in grant funding under the RUS ReConnect program through the Congressionally Directed Spending [provisions](#). The County's awarded application to RUS for the RUS grant funds described a partnership with Comcast to reach unserved areas included in this VATI application. Comcast, the County and RUS are in the process of negotiating an agreement under which the County and Comcast agree to the terms and conditions of the RUS grant program. Finalization of that agreement is contingent on Comcast receiving a waiver of certain provisions of the RUS Reconnect program. If the RUS agreement is executed, the County will contribute \$2,643,508 in matching funds to the project.

4. Overlap: To be eligible for VATI, applicants must demonstrate that the proposed project area(s) is unserved. An unserved area is defined as an area with speeds below 100/20 Mbps and with less than 25% service overlap within the project area for wireless projects and 20% for wireline projects. Describe any anticipated service overlap with current providers within the project area. Provide a detailed explanation as to how you determined the percentage overlap. Label Attachment: Attachment 3 – Documentation Unserved Area VATI Criteria.

Answer:

Comcast and the County anticipate no overlap of other ISP service areas within the Project Area. As noted above, the Project Area was selected based on a review of the Federal Communication Commission's ("FCC") Broadband Data Collection ("BDC") and other publicly available information, and Comcast's internal data. After consultation between the County and Comcast, the Project meets the eligibility criteria established by the Virginia General Assembly and DHCD for a VATI award. Because VATI eligibility criteria is more restrictive than some federal programs, the Project also meets eligibility criteria for the Coronavirus State and Local Fiscal Recovery Fund ("SLFRF") and the Capital Projects Fund ("CPF") established under the American Rescue Plan Act of 2021 ("ARPA").

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5. Total Passings: Provide the number of total serviceable units in the project area. Applicants are encouraged to prioritize areas lacking 25 Megabits per second download and 3 Megabits per second upload speeds, as they will receive priority in application scoring. For projects with more than one service area, each service area must have delineated passing information. Label Attachment: Attachment 4 – Passings Form.
- Of the total number of VATI passings, provide the number of residential, business, non-residential, and community anchors in the proposed project area.
 - If applicable, of the total number of RDOF passings, provide the number of residential, business, non-residential, and community anchors in the proposed project area.
 - If applicable, provide the number of passings that will require special construction costs, defined as a one-time fee above normal service connection fees required to provide broadband access to a premise . Describe the methodology used for these projections.
 - If applicable, provide the number of passings included in the application that will receive broadband access because special construction costs have been budgeted in the VATI application. Describe the methodology used for determining which passings with special construction costs were budgeted in the application.
 - Provide the number of passings in the project area that have 25/3 Mbps or less. Describe the methodology used for these projections. (up to 15 points)

Answer:

A. Comcast proposes to extend service to 399 locations that currently do not have access to broadband at speeds of at least 100Mbps/20Mbps. As noted in Attachment 4 – Passings Form, the Project Area includes 382 residential locations and 17 business locations. Please note that Charles City County's anchor institutions including the Roxbury Business Park, Charles City County Public Schools, Courthouses, the Heritage Public Library, the government center, and the Chickahominy Tribal Center are located primarily in Voting Districts One and Two, which were served by a previous VATI grant award.

B. Not Applicable

C. The Project is designed to achieve functionally universal broadband coverage in the County by extending infrastructure from Comcast's existing network in the County so [that](#) each of the 399 premises **[Redacted]**, meaning there will be no additional charges to connect to the customer's premises when the home or business owner decides to subscribe to service. This is conditioned on Comcast receiving any necessary right of access where private property construction is required.

D. As described above, Comcast's approach to this project is to complete all construction [work](#) necessary so that each location will not be subject to special construction costs, and therefore no such costs are included in this proposal.

E. Comcast and Charles City County analyzed the areas in the County that do not have access to Internet speeds of at least 25/3 Mbps using the FCC's BDC, its internal database, and publicly available data. Based on that review, Comcast and the County estimate 384 of the passings in the Project Area have access to Internet speeds of 25/3 Mbps or less.

6. Describe if any blocks awarded in Rural Digital Opportunity Fund (RDOF) are included in the VATI application area. If RDOF areas are included in the VATI application, provide a map of these areas and include information on number of passings in RDOF awarded areas within the VATI application area, and Census Block Group ID number for each block group in the project area. Label Attachment: Attachment 5 – RDOF Awarded Areas Form in VATI Area

Answer:

There are no RDOF award areas in Charles City County.

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7. **For wireless projects only:** Please explain the ownership of the proposed wireless infrastructure. Please describe if the private co-applicant will own or lease the radio mast, tower, or other vertical structure onto which the wireless infrastructure will be installed.

Answer:

Not Applicable.

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8. Network Design: Provide a description of the network system design used to deliver broadband service from the network's primary internet point(s) of presence to end users, including the network components that already exist and the ones that would be added by the proposed project. Provide a detailed explanation of how this information was determined with sources. Provide information on how capacity for scalability, or expansion, of how the network can adapt to future needs. If using a technology with shared bandwidth, describe how the equipment will handle capacity during peak intervals. For wireless projects, provide a propagation map for the proposed project area with a clearly defined legend for scale of map. Label Map: Attachment 6 – Propagation Map Wireless Project.

Answer:

Comcast's network, the Xfinity 10G Network, includes both hybrid fiber coax ("HFC") and fiber-to-the-home ("FTTH") technologies to deliver data to customers at speeds that meet or exceed the requested speed requirements. Comcast has multiple ways to deliver fast, reliable Internet services. Regardless of the infrastructure selected in the deployment of the network, whether Ethernet passive optical network ("EPON," a FTTH technology) or HFC, Comcast delivers a consistent, fast, reliable, and secure Internet experience to its customers. Technology decisions are driven by many variables, including type and proximity of the existing network and the characteristics of the proposed area. Comcast proposes to construct a fiber to the premises ("FTTP") network to the vast majority of the Project Area. This network will be capable of gigabit symmetrical speeds upon completion of construction. Specific product offerings will be based on then-current consumer demand and market conditions. Based upon preliminary design work, Comcast is building in a contingency that a limited number of locations in the Project Area would be best served by HFC, taking into account both efficiency and speed of deployment. This portion of the network will be capable of providing 1 Gbps/100 Mbps speeds as a result of enhancements Comcast is making to its network currently. The next generation, DOCSIS 4.0^[1], will allow Comcast to offer multi-gig symmetrical services starting this year. DOCSIS 4.0 is a technology platform that Comcast is using to digitize and virtualize much of the physical device technology and to move many of those activities into the cloud, allowing Comcast to innovate at the speed of software and to deliver multigigabit upload and download speeds to tens millions of Americans over the connections they already have in their homes. Comcast began launching the latest phase of its 10G work in 2021. This work involves updating equipment throughout its network, accelerating the digitization and virtualization efforts, and making a mid-split architectural transition that will allow Comcast to increase performance in the near term, while also readying its network for the full 10G upgrade. With the transition to mid-split architecture, which is scheduled to be complete by the end of 2025, Comcast will be able to deliver speeds above 1 Gbps downstream speeds and 100 Mbps upstream speeds. Thus, by the time any new networks are built, Comcast will be delivering on its promise to continue to offer its customers the best broadband experience and will be on the path to delivering service speeds well above 100/100 Mbps. Comcast has been deploying similar technologies for years as part of this evolution – in the industry it is known as Distributed Access Architecture (DAA) and "virtualized" Cable Modem Termination Systems (vCMTS). By leveraging full duplex and extended-spectrum capabilities, Comcast will be able to deliver those multi-gigabit speeds over its existing hybrid fiber-coaxial network. In preparation for faster network speeds, earlier this year, Comcast launched its latest Wi-Fi 6E Gateway, one of the first in the world to support multi-gigabit symmetrical Wi-Fi. Because Comcast is evolving its entire network architecture, equipment, and customer devices, it is uniquely positioned to deliver these advancements in speed, reliability, and performance to everyone it serves, not just a select few. And because much of this work is powered by software, these changes can be made with far less disruption to customers than other technologies. For more information on Comcast's multi-gig network deployment, see

<https://corporate.comcast.com/press/releases/comcast-expand-evolve-wifi-largest-multi-gigabit-network>. For information on Comcast's Network Performance, please see Comcast's Network Performance Report at https://update.comcast.com/wp-content/uploads/sites/33/dlm_uploads/2022/02/0222_2021NetworkReport_V19.pdf

Please see complete response to this question included as an optional attachment and labeled "VATI 2024 Application Charles City Project #2 Redacted, page # 8 .

9.

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Speeds: Describe the internet service offerings, including download and upload speeds, to be provided after completion of the proposed project. Detail whether that speed is based on dedicated or shared bandwidth, and detail the technology that will be used. This description can be illustrated by a map or schematic diagram, as appropriate. List the private co-applicant's tiered price structure for all speed offerings in the proposed project area, including the lowest tiered speed offering at or above 100/20 Mbps. (up to 10 points)

Answer:

Comcast will offer customers multiple choices of residential and commercial broadband services, depending on the customers' specific needs. Upon completion of the project, Comcast will be able to provide broadband speeds of at least 1 Gbps download and 100 Mbps upload. The fiber network will be capable of gigabit symmetrical speeds. Specific product offerings will be based on then-current consumer demand and market conditions. Included for reference and informational purposes only, the tables below (Xfinity Residential Service Tiers and Comcast Business Tiers) reflect service tiers, speeds, and pricing generally available for Comcast's current hybrid fiber-coaxial ("HFC") network offered in Virginia, including more densely populated areas. Comcast is currently pricing the services for the Project's EPON network and expects pricing to be consistent across all future networks in the County.

Xfinity Residential Service Tiers (currently offered in the County)

Tier

Speeds Up To (Download / Upload)

Standalone Pricing

Connect

75 Mbps / 10 Mbps

\$65.00 monthly

Connect More

200 Mbps / 10 Mbps

\$87.00 monthly

Fast

400 Mbps / 10 Mbps

\$102.00 monthly

Superfast

800 Mbps / 20 Mbps

\$107.00 monthly

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Gigabit

1 Gbps / 20 Mbps

\$112.00 monthly

Gigabit Extra

1.2 Gbps / 35 Mbps

\$117.00 monthly

Gigabit x2

2 Gbps / 100Mbps

\$130.00 monthly

**Gigabit x2 is only available in network enhanced areas with xFi Complete*

As noted above, Comcast is currently pricing the services for the all-fiber EPON network being proposed in response to this RFP. Comcast recently began launching all-fiber service in neighboring states and expects the pricing to be consistent across future EPON networks in Virginia. The chart below is provided to be illustrative of the speed tiers and pricing of Comcast's gigabit symmetrical service.

Xfinity Residential Service Tiers (EPON Markets)

Tier

Speeds Up To (Download / Upload)

Standalone Pricing

Connect

75 Mbps / 75 Mbps

\$65.00 monthly

Connect More

200 Mbps / 200 Mbps

\$87.00 monthly

Fast

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400 Mbps / 400 Mbps

\$102.00 monthly

Superfast

800 Mbps / 800 Mbps

\$107.00 monthly

Gigabit

1 Gbps / 1 Gbps

\$112.00 monthly

Comcast is committed to ensuring its network is reliable and customers are receiving service speeds to which they subscribed. Comcast network engineers and technicians work diligently to proactively monitor network performance and have systems in place that measure speed and latency to end users. Comcast's Xfinity Internet Measurement Platform is a cutting-edge system with an independently validated methodology that automatically measures the quality of end-user connections. This includes both speed and latency measurements. The system runs over 700,000 tests per day across all regions and times of day – and it can provide reporting on performance in specific areas. Tests are run from millions of Comcast cable modem gateways to servers in regional data centers – where network interconnection to Content Delivery Networks and other networks often occurs - providing an accurate picture of ISP access network performance. Moreover, tests run continuously throughout the day, capturing both peak & off-peak performance and measuring downstream speed, upstream speed, idle latency, and working latency. The tests do NOT evaluate the performance of the local Wi-Fi network because that is not indicative of network performance – tests are appropriately focused on the service provided to the end user's home. In some limited cases, a comparable independent measurement system may be used instead of this system or as a validation check on the system.

Please see complete response to this question included as an optional attachment and labeled "VATI 2024 Application Charles City Project #2 Redacted, page # 10 .

10. Explain how the proposed project achieves universal broadband coverage for the locality or fits into a larger plan to achieve universal broadband coverage for the locality. If applicable, explain the remaining areas of need in the locality and a brief description of the plan to achieve universal broadband coverage. (up to 50 points)

Answer:

The proposed Project, together with the County's second application, will achieve near-ubiquitous coverage in the County. It would expand Comcast's existing service area to include locations that do not currently have access to service based on County data, the FCC's BDC map, and Comcast's internal data analysis.

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11. Project Readiness

Describe the current state of project development, including but not limited to: planning, preliminary engineering, identifying easements/permits, status of MOU or MOA, and final design. Prepare a detailed project timeline or construction schedule, identifying specific tasks, staff, contractor(s) responsible, collection of data, etc., and estimated start and completion dates. Applicants are encouraged to extensively discuss, where applicable, easements relating to railroad crossings, federally-owned lands and parks, partnerships with the Virginia Department of Transportation, and mobile home parks. Applicants must include Memorandums of Understanding (MOUs) or Memorandums of Agreement (MOAs) between applicants (drafts are allowable). Label Attachments: Attachment 7 – Timeline/Project Management Plan; Attachment 8 – MOU/MOA between Applicant/Co-Applicant; (up to 10 points)

Answer:

Comcast has completed the planning and preliminary engineering phase for the proposed Project. Final engineering, design, and construction will commence upon the award of the grant. The initial tasks include project engineering and right-of-way preparation. This Project includes a combination of underground and aerial construction. Given that Comcast already has facilities near the Project Area, which it can leverage in this Project, Comcast will be able to implement the Project quickly, upon receiving the final permits. Throughout the Project's duration, a dedicated Comcast team member will be in contact providing status and answering any questions the community may have, and the County will communicate progress and issue press releases and other forms of community outreach including social media. Comcast anticipates completing the project within 18 months after contract execution between the County and DHCD. As contemplated by the 2024 VATI guidelines, Comcast may request an extension if it encounters permitting, pole attachment, or other circumstances beyond its control that may delay the project timeline. Comcast will activate service as areas are completed so many residents and businesses will be able to access service earlier than the end of the project. Comcast will leverage existing pole attachment agreements with all the pole-owning utilities in the Project Area. Having deployed thousands of miles of plant in Virginia, Comcast has extensive experience working with pole owners and their processes to obtain the required permits to attach to poles. Other permitting and supply chain delays not reasonably anticipated by Comcast may also pose a risk to timely completion, however, Comcast's extensive network of engineers, technicians, vendors, and partners provides an edge in ensuring a timely delivery of projects. The scale of Comcast's business also allows it to lock in competitive pricing on materials and equipment and effectively manage large projects.

See Attachment 7 for the Timeline and Project Management Plan and Attachment 8 for the MOU/MOA between Applicant/Co-Applicant (Draft).

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12. Has the applicant or co-applicant received any VATI grants? If so, provide a list of these grants, with a detailed summary of the status of each.

Answer:

Between 2017 and 2021, DHCD awarded Comcast five (5) VATI grants. Comcast has [successfully](#) met or exceeded the requirements of each of those awards, having constructed the projects on time and within the proposed budget. Comcast has deployed broadband, with speeds up to 1.2 Gbps and with services options designed for low-income households, to over 3,500 locations throughout the project footprints. Comcast was awarded a sixth VATI grant in 2022 in Stafford County and is nearly complete with that project as well. Charles City County in partnership with Comcast was awarded a VATI grant in 2020 that covered 2/3 of the county with broadband infrastructure, primarily in Districts One and Two. The project was recently closed out successfully after the parties satisfied multi year reporting requirements.

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13. Matching funds: Complete the funding sources table indicating the cash match and in-kind resources from the applicant, co-applicant, and any other partners investing in the proposed project (VATI funding cannot exceed 80 percent of total project cost). In-kind resources include, but are not limited to: grant management, acquisition of rights of way or easements, waiving permit fees, force account labor, etc. Please note that a minimum 20% match is required to be eligible for VATI, the private sector provider must provide 10% of the required match. If the private co-applicant cash match is below 10% of total project cost, applicants must provide financial details demonstrating appropriate private investment. If applicants and co-applicants are seeking to include prior expended funds as matching funds, Attachment 11 must be completed. Label Attachments: Attachment 9 - Funding Sources Table; Attachment 10 – Documentation of Match Funding; Attachment 11 - Prior Expended Match Form

Answer:

The proposed Project represents a partnership between Comcast and the County. Comcast, the co-applicant, upon award of the VATI grant, will be responsible for \$1,476,053 in [matching](#) funds and will provide the labor and materials to complete the provision of services to the Project Area delineated in Attachment 16 – Point and Polygon Shapefiles. As noted above, Comcast is also working with the County to negotiate an agreement under which the County would receive \$2,643,508 in grant funding under RUS Reconnect for Congressionally Directed Spending projects. If VATI funding is awarded to the project, and contingent upon negotiation of a grant agreement on mutually agreeable terms, the County will contribute additional matching funds to the project lessening the amount requested from DHCD under VATI.

Comcast will provide approximately 20% of the projected construction costs of \$7,380,264 totaling approximately \$1,476,053. The County will assist by providing in-kind contributions including application analysis and preparation, coordination with DHCD, assistance with right-of-way permitting, and participating in further concert with Comcast as the Project is approved and construction begins. The estimated in-kind contribution by Charles City County is greater than \$250,000.00 and is valued based on the salary and benefits of key leadership team members including the County Administrator, Assistant County Administrator, and Finance Director.

A breakdown of costs is attached below. Please see Attachment 9 – Funding Sources Table and Attachment 12 - Derivation of Cost for additional details.

Locations: 399

Mileage: 77

Homes per Mile: 5.2

Total Cost: \$7,380,264

Comcast Match: \$1,476,053

RUS Funding: \$2,643,508*

VATI Gap Funding: \$3,260,703

*Pending final negotiation of an agreement under which the County and Comcast agree to the terms and conditions of the RUS grant program.

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14. Leverage: Describe any leverage being provided by the applicant, co-applicant, and partner(s) in support of the proposed project. (up to 10 points)

Answer:

In addition to the leverage funds of \$4.1 million from other sources (Comcast and RUS) the County will provide support for the project by assisting with permitting and grant administration. Key leadership team members include the County Administrator, Finance Director, and Community Development Director/Assistant County Administrator. These parties are estimated to devote 1/3 of their time for the project and grant management over an estimated 24 months, pre and post-contract execution and project implementation, at an estimated cost above \$248,667.00 including salary and fringe benefits. The County proposes to provide extensive support to the project/grant without charging administrative costs to the project. The County will also assist with local marketing of the availability of service to residential and business [customers](#). When Comcast constructs service to a new area, we design the project to make every location drop serviceable so that all locations in the project are considered standard installations. Comcast absorbs the costs of installing a drop when we install a customer, which averages \$500 per location, or \$00 if every resident in the Project Area subscribed to service.

Once the Project is complete, Comcast can leverage teams in other regions to support the County in times of emergency and can open its WiFi network to support emergency response. Comcast's financial stability and geo-distributed cybersecurity operations center will provide peace of mind and reliable service to the County. As noted throughout this response, Comcast continually invests in its network to ensure it can offer innovative products that meet the needs of residents and businesses in the County. Comcast is also a member of CableLabs, a premier innovation lab for future-forward research and development that facilitates cutting-edge solutions that incorporate university research, vendors, telecommunications companies and other industries. The partnership with CableLabs and others in the telecommunications industry supports the development of many technological advancements that keep Comcast on the cutting edge and prepared for the digital future.

In-Kind/ Free Service Installations - Comcast's standard installation fee of \$100.00 is waived for all residents and businesses who subscribe to service as a result of this project. For Sector 3 the in-kind value of installing service at 399 homes is \$39,900.

15. Communications Plan: Describe efforts to keep the public informed of project progress and the broadband adoption plan.

a. Explain how you plan on communicating the project status to stakeholders, including but not limited to County leadership, project areas residents, etc. (Up to 10 points)

b. 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. (up to 10 points)

c. Describe any digital literacy efforts to ensure residents and businesses in the proposed project area sufficiently utilize broadband. Please list any partnering organizations for digital literacy, such as the local library or cooperative extension office.

Answer:

A. Comcast will keep the public informed of Project progress and drive broadband adoption through a variety of means including mailing information to residents, local media, and outreach to the community. Also, Comcast will drive the adoption of the affordable subscriber options, Internet Essentials, and Internet Essentials Plus, to all eligible residents. Interested residents will be able to sign up for service by calling Comcast's toll-free telephone number, using Comcast's website or in

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person at the nearest Xfinity store. Comcast employs a sales and marketing team of professionals to support these efforts and call center team members are skilled in addressing questions regarding Comcast's products and services. If conditions allow, a public meeting or event can be held in conjunction with the County in or near the Project Area to inform the residents about the upcoming work and answer questions. Comcast will continue to meet regularly with the County to discuss Project status and will provide written progress update reports throughout the duration of the Project. Comcast is available at any time to address any questions or concerns that may arise during the Project.

B. Forecasting a take rate with a high degree of accuracy is most challenging as the actual number of customers who choose to subscribe is beyond the parties' control. Comcast's take rate estimate for the Project Area is based upon several unique factors. The County's support for the Project and involvement with the community is expected to add heightened awareness earlier than might otherwise occur. The public nature of the VATI program is also expected to add to the early awareness of residents of broadband availability and positively enhance the take rate. In Comcast's experience, take rates are relatively higher in areas that have not had access to broadband service in the past. Comcast anticipates no different outcome with this Project. Nonetheless, as Comcast bears all operational risk once the Project construction is complete and the proposed Project Area represents less than 1% of Comcast's current Virginia locations served, there is no risk to the Commonwealth, or County, of lower-than-average take rates. Comparisons between applicants may not provide a useful measure of broadband access as each applicant will have different service offerings, marketing campaigns, and other intangibles that could drive take rates. For example, Comcast take rates may vary from those of other providers because Comcast offers more services than broadband alone – including video, telephone, mobile telephone, and home security outlined in Attachment 21 – and offers bundled pricing promotions from time to time. These additional products and pricing options can change the value proposition of Comcast service for each household and business which is unique among providers.

C. Comcast is committed to serving all residences and businesses within the Project Area on a non-discriminatory basis with a variety of service options for affordable home Internet for qualifying households. Under Comcast's Internet Essentials offering – the most comprehensive and successful low-income broadband adoption program in the nation – qualifying households can obtain broadband service at speeds of up to 50Mbps/10Mbps for \$9.95/month (plus applicable taxes, fees, and surcharges), or speeds of up to 100Mbps/20Mbps for \$29.95/month (plus applicable taxes, fees, and surcharges), as well as free digital skills training in person and online. Customers have the option to purchase a low-cost Internet-ready computer. Comcast has continued a commitment it made in 2011 to keep its Internet Essentials price at \$9.95/month (plus applicable taxes, fees, and surcharges). In 2022, Comcast introduced a new tier of Internet Essentials called Internet Essentials Plus for \$29.95/month (plus applicable taxes, fees, and surcharges), that delivers speeds up to 100/20Mbps. Current Internet Essentials customers can upgrade to this plan, and new qualifying customers can subscribe directly to this tier.

Since launching in 2011, Comcast has made dozens of improvements to the Internet Essentials program, including expanding eligibility 12 times—bringing Internet Essentials to new audiences such as public housing residents, low-income veterans, seniors, and even community college students. Comcast has a history of increasing speeds and enhancing its Internet Essentials program and anticipates continuing to do so in the future. Illustrating this impact, in a 2021 Comcast survey, 76% of participants in Comcast's Internet Essentials broadband adoption program said their service has helped someone in their household

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find a job, and 78% of households with lost wages due to COVID-19 believe Internet Essentials has helped reduce that loss. 79% said the service has helped them find health and/or medical information. Significantly, 90% reported a positive impact on their child's grades. In 2020, Comcast established its award-winning "Lift Zones" initiative to complement the Internet Essentials program. Working with its network of thousands of non-profit partners and city leaders, Comcast launched more than 1,250 Lift Zones by the end of 2022. Lift Zones—including a location at the Chickahominy Indian Tribe in Charles City County--provide free, robust WiFi in community centers to support students who, for a variety of reasons (including homelessness or housing insecurity), are simply unable to participate in distance learning at home. Lift Zones also serve diverse adult populations, as they enable access to hundreds of hours of free digital skills training for remote work, telehealth services, and more.

Please see complete response to this question included as an optional attachment and labeled "VATI 2024 Application Charles City Project #2 Redacted, page #16 .

16. Project Management: Identify key individuals who will be responsible for the management of the project and provide a brief description of their role and responsibilities for the project. Present this information in table format. Provide a brief description of the applicant and co applicant's history and experience with managing grants and constructing broadband communication facilities.

Answer:

Charles City County's leadership and executive administrative team consists of team members with collective grant management experience of more than fifty years. The team consists of Ms. Michelle Johnson, County Administrator, Mrs. Abby Pemberton, Finance Director, and Ms. Rhonda L. Russell, Community Development Director/Assistant County Administrator. Additionally, the project will be supported by Comcast, the county's VATI grant partner. Ms. Johnson will serve as the Chief Administrative Officer responsible for signing and monitoring the DHCD contract and providing direct oversight and management of the overall project. Ms. Johnson is the County Administrator for Charles City County. Ms. Johnson is a graduate of Virginia State University, where she earned a Bachelor of Science degree in accounting. She is also a graduate of Leadership Metro Richmond, class of 2016. Ms. Johnson worked in corporate America and state government for several years after graduating and began her public service career in Charles City County in 2003. Ms. Johnson has managed budgets of more than \$25 million, and as many as 100 employees. Dr. Russell will serve as the Grant Administrator. She is primarily responsible for aiding in the areas of overall grant administration including record keeping, preparation of required reports to the VDHCD in conformance with grant requirements, and coordinating management team meetings. Dr. Russell has extensive public service and management experience amassed over a twenty-year local government career where she has managed as many as thirteen employees, departmental budgets of more than \$500,000.00, written, received, and implemented multiple grant awards for housing rehabilitation, broadband, and sewer infrastructure and lead abatement projects, totaling more than \$50 million. Additionally, Dr. Russell's noteworthy academic preparation includes an undergraduate Planning Degree, from Va. Tech, Blacksburg, Virginia, a Master of Public Administration degree, from Old Dominion University, Norfolk, Virginia, and a terminal degree in Organizational Leadership with a concentration in Human Services Administration, Nova Southeastern University, Fort Lauderdale, Florida. Mrs. Christina Jones will serve as the project's Financial Manager. In this capacity, she will oversee the overall implementation of the project including signing and approving any financial reports and documents related to the project including requests for contract extensions, budget revisions, annual reports, draw-down forms, and close-out forms. Mrs. Jones is an alumnus of Virginia State University and holds a degree in business management. Mrs. Jones has extensive experience in both the private and public sectors.

Comcast's operations in the Commonwealth are managed through Comcast's Beltway Region, with regional headquarters located at 1215 E Fort Ave., Ste #103, Baltimore, MD. Comcast's team of project managers, engineers, and technicians have the necessary technical, front-line support, and established back-office expertise to complete this proposed Project and provide continued 24/7 network support. The following CVs provide examples of the experienced personnel Comcast has available to complete the Project. Comcast has significant experience constructing broadband communications facilities, including partnerships with public agencies to deploy broadband infrastructure in unserved areas. It is a leading

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communications provider in Virginia, offering video, high-speed Internet, home security, and phone services to residential customers under the Xfinity brand and also providing services to businesses through its Comcast Business suite of products. Comcast has invested in technology to build an advanced network that delivers among the fastest broadband speeds, and brings customers personalized video, communications, and home management offerings. Comcast has invested billions of dollars to create a network across the U.S. that makes broadband widely available, as part of its commitment to provide superior services to its customers. As noted above, Comcast was awarded six (6) VATI grants in 2018, 2019, 2020 and 2022. Comcast has successfully met or exceeded the requirements of 5 awards, having constructed the projects on time and within the [proposed](#) budget, and is currently completing the sixth project in Stafford County. Comcast has deployed broadband, with speeds up to 1.2 Gbps and with services options designed for low-income households, to over 3,500 locations throughout the project footprints. In 2018 Comcast also earned a Last Mile Broadband grant from the Virginia Tobacco Region Revitalization Commission to provide broadband access to nearly 7,000 homes and businesses. Construction was completed in 2020 and ahead of schedule. Comcast provided access to 1,000 more homes and addresses than originally estimated. During this period, Comcast has partnered with other states and counties on broadband expansion projects funded in part by the American Rescue Plan Act (“ARPA”) and Capital Projects Fund (“CPF”). Comcast’s successful completion of these construction projects, including meeting all Treasury compliance requirements, has resulted in years-long partnerships with states including Maryland, Pennsylvania, Delaware, West Virginia, and Massachusetts. Comcast was awarded several grants under the various broadband expansion programs administered by the Maryland Department of Housing and Community Development’s Office of Statewide Broadband, the Delaware Broadband Initiative, and the Massachusetts Technology Collaborative (“Mass Tech”). Comcast completed the projects on time, on budget, and in many cases was able to reach more homes than originally [anticipated](#). Comcast is currently expanding service to unserved and underserved areas through participation in the following programs: West Virginia Line Extension and Development (“LEAD”) and Major Broadband Funding Strategies (“MBPS”) Programs and the Commonwealth of Pennsylvania Unserved High-Speed Broadband (“UHSB”) Program. In addition, Comcast is working with Washington and Dauphin Counties in Pennsylvania, and multiple other local jurisdictions to extend service to thousands of unserved and underserved locations.

Please see complete response to this question included as an optional attachment and labeled "VATI 2024 Application Charles City Project #2 Redacted, page # 19 .

17. **Project Budget and Cost Appropriateness**

Budget: Applicants must provide a detailed budget that outlines how the grant funds will be utilized, including an itemization of equipment, construction costs, and a justification of proposed expenses. If designating more than one service area in a single application, each service area must have delineated budget information. For wireless projects, please include delineated budget information by each tower. Expenses should be substantiated by clear cost estimates. Include copies of vendor quotes or documented cost estimates supporting the proposed budget. Label Attachments: Attachment 12 – Derivation of Costs; Attachment 13 - Documentation of Supporting Cost Estimates. (up to 10 points)

Answer:

Comcast estimates that this Project will cost \$7,380,264. Comcast’s construction estimates are determined through a detailed project analysis that includes a desktop survey, an analysis of permitting costs, a network impact study to determine necessary hub site preparation and possible infrastructure requirements, and a financial evaluation for overall build costs and likely return-on-investment. When contract labor is utilized, costs are accrued according to the fee schedule in the

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contract. The design and construction process is standard within the telecommunications industry. It is appropriate to use public funds for this proposed Project because private, at-risk capital is not likely to be invested by service providers in this area due to low population density.

Comcast is seeking support of \$5,904,211 from the [VATI](#) program to expand broadband service to unserved homes and businesses in the Project Area. Comcast, upon award of the grant, will be responsible for \$1,476,053 or 20% matching funds and will provide the labor and materials to complete the provision of services to the Project Area described in this response. As noted in Section 14 (Matching Funds), VATI Funding may be reduced using County matching funds appropriated through RUS Reconnect for Congressionally Directed Spending, pending negotiation of a grant agreement on mutually agreeable terms.

Project Costs Breakdown

Project Phase

Cost

New Equipment/Materials

Redacted

New Construction

Redacted

Engineering/Design

Redacted

Permits/Make-Ready

Redacted

Surveys

Redacted

Total

\$ 7,380,264

Comcast's expenses fall into five (5) categories: New Equipment/Materials, New Construction, Permits, Engineering and Surveys. New Equipment/Materials includes mainly "outside plant equipment" such as nodes and optical equipment, power supplies, fiber cable, coaxial cable, conduit, vaults, pedestals and strand. This category also includes "inside plant equipment" such as ethernet switches. New Construction expenses cover the cost of installing the plant including make-

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ready construction. For underground construction, this involves directional boring; installing pedestals, vaults, and conduits; pulling in cable; demolition and build-back and debris removal. Aerial construction includes placing strand, lashing cables, placing anchors, and placing poles. This category also includes fiber and coaxial splicing and testing the new network. Engineering/Design covers design of the network, including the completion of permit-ready detailed drawings based on walk-out surveys. The Permits/Make-Ready category includes the cost of submitting make-ready applications to pole owners and fees for any other permits required by the project. Survey expenses include the cost of performing a walkout survey, completing pole profiles, make ready assessment, and geotechnical surveys for underground work. Comcast's expenses fall into five (5) categories: New Equipment/Materials, New Construction, Permits, Engineering and Surveys.

New Equipment/Materials includes mainly "outside plant equipment" such as nodes and optical equipment, power supplies, fiber cable, coaxial cable, conduit, vaults, pedestals and strand. This category also includes "inside plant equipment" such as ethernet switches. New Construction expenses cover the cost of installing the plant including make-ready construction. For underground construction, this involves directional boring; installing pedestals, vaults, and conduits; pulling in cable; demolition and build-back and debris removal. Aerial construction includes placing strand, lashing cables, placing anchors, and placing poles. This category also includes fiber and coaxial splicing and testing the new network. Engineering/Design covers design of the network, including the completion of permit-ready detailed drawings based on walk-out surveys. The Permits/Make-Ready category includes the cost of submitting make-ready applications to pole owners and fees for any other permits required by the project. Survey expenses include the cost of performing a walkout survey, completing pole profiles, make ready assessment, and geotechnical surveys for underground work.

18. The cost benefit index is comprised of state cost per unit passed. Individual cost benefit scores are calculated and averaged together to create a point scale for a composite score. Provide the following:
- a. Total VATI funding request
 - b. Number of serviceable units
(up to 125 points)

Answer:

1. *Total VATI funding request* – \$3,260,703
2. *Number of serviceable units* – 399

Upon completion of the Project, Comcast would handle all network upgrades, maintenance and repair to ensure fast, reliable, and scalable broadband service to residents and businesses and not seek additional public funding for the Project area. In addition, Comcast would reinforce DHCD's economic development work by encouraging broadband adoption through outreach activities as described in section 20(f) below.

19.

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Commonwealth Priorities (Up to 50 points)

Additional points will be awarded to proposed projects that reflect Commonwealth priorities. If applicable, describe the following:

- a. Businesses, community anchors, or other passings in the proposed project area that will have a significant impact on the locality or region because of access to broadband.
- b. Unique partnerships involved in the proposed project. Examples include electric utilities, universities, and federal/state agencies.
- c. Digital equity efforts to ensure low to moderate income households in the proposed project area will have affordable access to speeds at or above 100/20 mbps, include information regarding the internet service provider's participation in the Affordable Connectivity Program
- d. The co-applicant's efforts to mitigate supply chain constraints, including labor shortages and order-to-delivery delays on telecommunications materials required to construct broadband networks.
- e. The applicant's and co-applicant's efforts to promote broadband adoption, including, but not limited to: telehealth, smart farming, e-entrepreneurship, and distance learning.

Answer:

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A. Comcast and the County's proposed Project will provide a broadband network capable of delivering speeds that reliably meet or exceed 100 Mbps download and at least 20 Mbps upload speeds and be scalable to a minimum of 100 Mbps symmetrical for download and upload speeds based on future technology advances to 382 residential customers and 17 businesses. The Project will greatly improve the County's economic vitality by supporting business growth and job creation by providing access to broadband service in unserved areas of the County. The Project provides the infrastructure needed to improve residents' quality of life by enabling residents to bridge the local skills gap, expand their career pathways, access and engage in telehealth opportunities, pursue education, and more. Upon completion of this project, residents and businesses would have access to some of the fastest and most reliable broadband speeds available nationwide.

B. As noted throughout this response, Comcast has significant experience in partnering with local government in broadband deployment projects. As a leading broadband provider in the Commonwealth and the country, Comcast understands what is necessary to deploy broadband infrastructure in locations with varied geography and population densities. Comcast has successfully engaged in public-private partnerships and understands the importance of them in expanding the network to serve otherwise uneconomical areas in many localities, including the County.

C. As of August 14, 2023, ACP has helped to connect more than 20 million households to broadband access. At a May 2022 White House event, Comcast was recognized for stepping up with innovative offerings like Internet Essentials Plus to help eligible households take full advantage of the ACP credit. (<https://www.meritalk.com/articles/white-house-lines-up-broadband-providers-websites-for-acp/>). Under ACP, qualifying households may receive a credit of up to \$30/month (\$75/month in Tribal lands) toward any Xfinity Internet service tier, including Internet Essentials and Internet Essentials Plus, and/or Xfinity Mobile service. If customers have both Xfinity Internet and Xfinity Mobile, the ACP credit will first be applied toward Internet and any remaining credit will be automatically applied to their Xfinity Mobile data usage and/or services fees.

Internet Essentials and Internet Essentials Plus are each fully covered by the ACP credit. In addition, an Internet Essentials customer (paying \$9.95/month) who is enrolled in ACP can have the remaining ACP credit applied to their Xfinity Mobile service. For example, an Internet Essentials participant (paying \$9.95/month) who adds one line of Unlimited on Xfinity Mobile (\$45/month) will only pay \$24.95/month after applying the remainder of the ACP credit. For more information, see <https://corporate.comcast.com/press/releases/comcast-affordable-connectivity-program-internet-essentials-service-xfinity-mobile>.

Please see complete narrative response to Question No. 1 included as an optional attachment and labeled. "VATI 2024 Application Charles City- Project #2 Redacted" page #25.

20.

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Additional Information

Please attach any letters of support from stakeholders. If the applicant is not a locality(s) in which the project will occur, please provide a letter of support from that locality.

Attachment 14 – Letters of Support.

Provide the two most recent Form 477 submitted to the FCC, or equivalent, as well as point, polygon, and, for wireless providers, RSSI shapefiles for the project area **in .zip file form**. With attachments 17 through 20, attach any other information that the applicant desires to include. Applicants are limited to four additional attachments.

Label Additional Attachments as:

- a. Attachment 15 –Two most recent Form 477 submitted to the FCC or equivalent
- b. Attachment 16 - Point and Polygon shapefiles, in.zip file form, showing proposed passings and project area
- c. Attachment 17 - For wireless applicants: shapefiles, in .zip file form, indicating RSSI projections in the application area
- d. Attachment 18 – XXXXXXXX
- e. Attachment 19 – XXXXXXXX
- f. Attachment 20 – XXXXXXXX

Answer:

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Charles City County and Comcast partnered to submit applications for VATI funding in FY2022 and FY2023. An evaluation of the application score sheets noted subpar scores in coordination with the Chickahominy Tribe, high costs per serviceable unit and the exclusion of community service facilities as serviceable units. Our VATI 2025 application addresses these noted deficiencies as follows:

Coordination with the Chickahominy Tribe- Charles City County enjoys a transparent and seamless relationship with Chickahominy Tribe leadership. Included in this application is a letter of support from the Chickahominy Tribe. Both the County and Comcast are supporting the Chickahominy's efforts in the areas of digital literacy and expansion of broadband infrastructure for tribal members.

Cost of Serviceable Units- The high unit costs for broadband infrastructure in District Three are due significantly to the low density of development in this area. The VATI 2024 application reduces the per unit costs to service each residence by expanding match dollars for the grant with both private and grant dollars. The applicant desires to expend the Reconnect grant funds awarded to Charles City County for District Three Broadband implementation, \$2,643,508.00 in conjunction with a VATI award. These funds have not been tasked to a project for implementation. A VATI award will limit will allow the County to complete expansion to unserved locations using the Reconnect funds before overall projects implementation costs increase due to steadily increasing rates for material and labor.

Exclusion of Community Service Facilities- Charles City County and Comcast partnered in FY20 to submit a VATI application that was subsequently awarded. The VATI FY20 grant funds provided broadband infrastructure for more than 2/3 of the County, primarily in Districts 1 and 2. All of the County's community service facilities including public schools, recreation facilities, government buildings, libraries, and many churches are in Districts 1 and 2. These facilities were serviced in the VATI FY20 funded grant. A limited number of facilities proposed for connection using VATI 2025 funds include a fire station, and a few churches.

Attachments:

Map(s) of project area, including proposed infrastructure

Attachment1ProjectAreaMapCharlesCityProject21217202352626.pdf

Documentation of Federal Funding (CAF/ACAM/USDA/RDOF, etc...) in and/or near proposed project area.

Attachment2DocumentationofFederalFundingAreaCharlesCity1217202352632.pdf

Documentation that proposed project area is unserved based on VATI criteria

Attachment3DocumentationUnservedAreaVATICriteria1217202352638.pdf

Propagation Map if Wireless Project

Attachment6PropagationMapWirelessProjectsonly1217202352714.pdf

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Timeline/Project Management Plan

Attachment7TimelineProjectManagementPlan1217202352706.pdf

MOU/MOA between applicant/co-applicant (can be in draft form)

Attachment8MOUMOA1217202352722.pdf

Documentation of Supporting Cost Estimates

Attachment13DocumentationofSupportingCostEstimatesCharlesCityProject2Redacted1219202342850.pdf

Letters of Support

SupportLetters1217202353645.zip

Two most recent Form 477 submitted to the FCC or equivalent

Attachment15TwomostrecentForm477submittedtotheFCCorequivalent1217202352746.pdf

Point and Polygon shapefiles, in .zip file form, showing proposed passings and project area

CharlesCity2ProposedProjectAttachment1631219202333502.zip

For wireless applicants: shapefiles, in .zip file form, indicating RSSI projections in the application area

Attachment17RSSIProjectionShapefiles1219202332903.pdf

Optional

VATI2024Signed1219202341044.pdf

Optional

VATI2024ApplicationCharlesCityProject2REDACTED1219202340400.pdf

Optional

ChicahominyTribeLetterofSupport1218202340644.pdf

Documentation of Match Funding

Attachment10DocumentationforMatchFundingCharlesCity1218202322306.pdf

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Derivation of Cost/Project Budget (Use template provided)

Attachment12DerivationofCostsCharlesCityProject2Redacted1219202340550.pdf

Funding Sources Table (Use template provided)

Attachment9FundingSourcesCharlesCityProject212182023113322.pdf

Prior Expended Match Form (use template provided)

Attachment11PriorExpendedMatchForm12182023113313.pdf

Passings Form (Use template provided)

Attachment4PassingsFormCharlesCityProject212182023113255.pdf

Documentation of RDOF awarded area in VATI project Area (Use template provided)

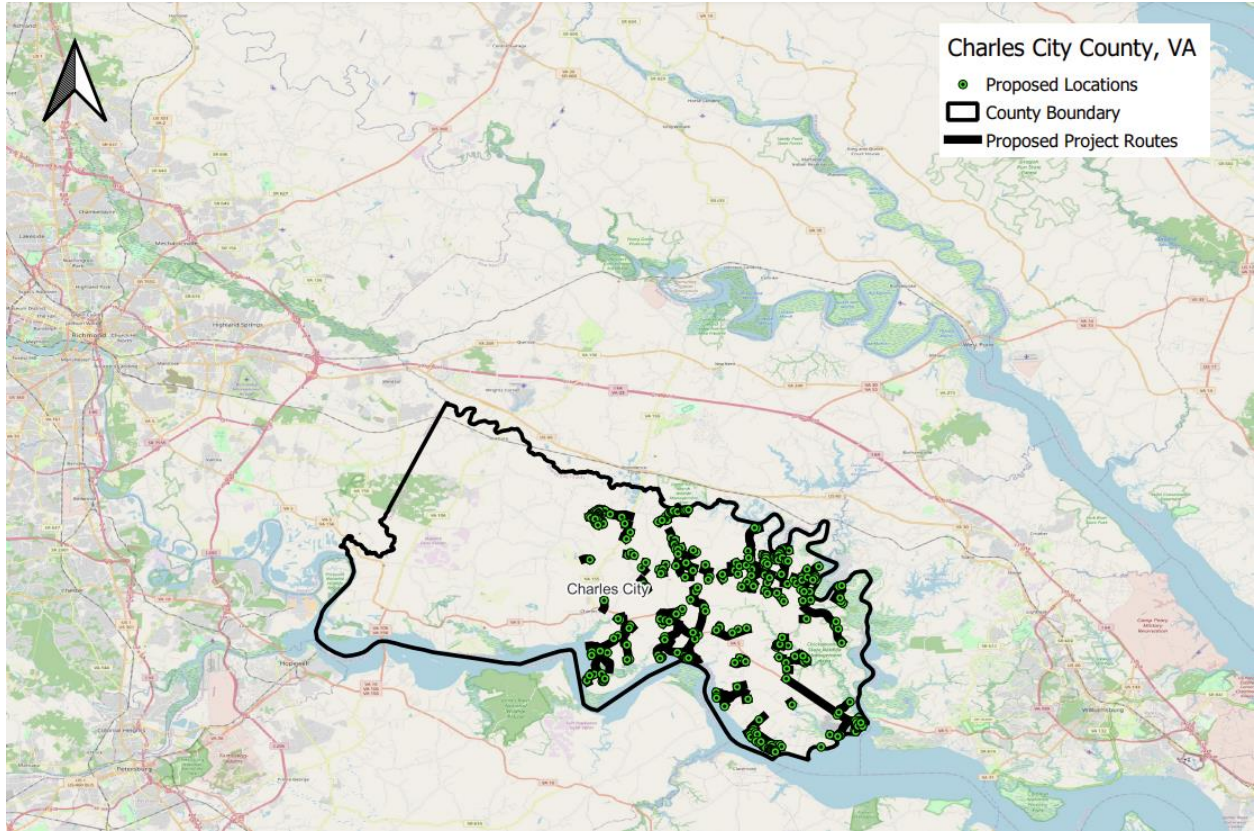
Attachment5RDOFAwardedAreasincludedinVATIApplication12182023113304.pdf

Notes:

VATI 2025 Application Charles City County and Comcast partnered to submit applications for VATI funding in FY2022 and FY2023. An evaluation of the application score sheets noted subpar scores in coordination with the Chickahominy Tribe, high costs per serviceable unit and the exclusion of community service facilities as serviceable units. Our VATI 2025 application addresses these noted deficiencies as follows: 1) Coordination with the Chickahominy Tribe- Charles City County enjoys a transparent and seamless relationship with Chickahominy Tribe leadership. Included in this application is a letter of support from the Chickahominy Tribe. Both the County and Comcast are supporting the Chickahominy's efforts in the areas of digital literacy and expansion of broadband infrastructure for tribal members. 2) District Three are due significantly to the low density of development in this area. The VATI2025 application reduces the per unit costs to service each residence by expanding match dollars for the grant with both private and grant dollars. The applicant desires to expend the Reconnect grant funds awarded to Charles City County for District Three Broadband implementation, \$2,643,508.00 in conjunction with a VATI award. These funds have not been tasked to a project for implementation. A VATI award will limit will allow the County to complete expansion to unserved locations using the Reconnect funds before overall projects implementation costs increase due to steadily increasing rates for material and labor. 3) Exclusion of Community Service Facilities- Charles City County and Comcast partnered in FY20 to submit a VATI application that was subsequently awarded. The VATI FY20 grant funds provided broadband infrastructure for more than 2/3 of the County, primarily in Districts 1 and 2. All of the County's community service facilities including public schools, recreation facilities, government buildings, libraries, and many churches are in Districts 1 and 2.

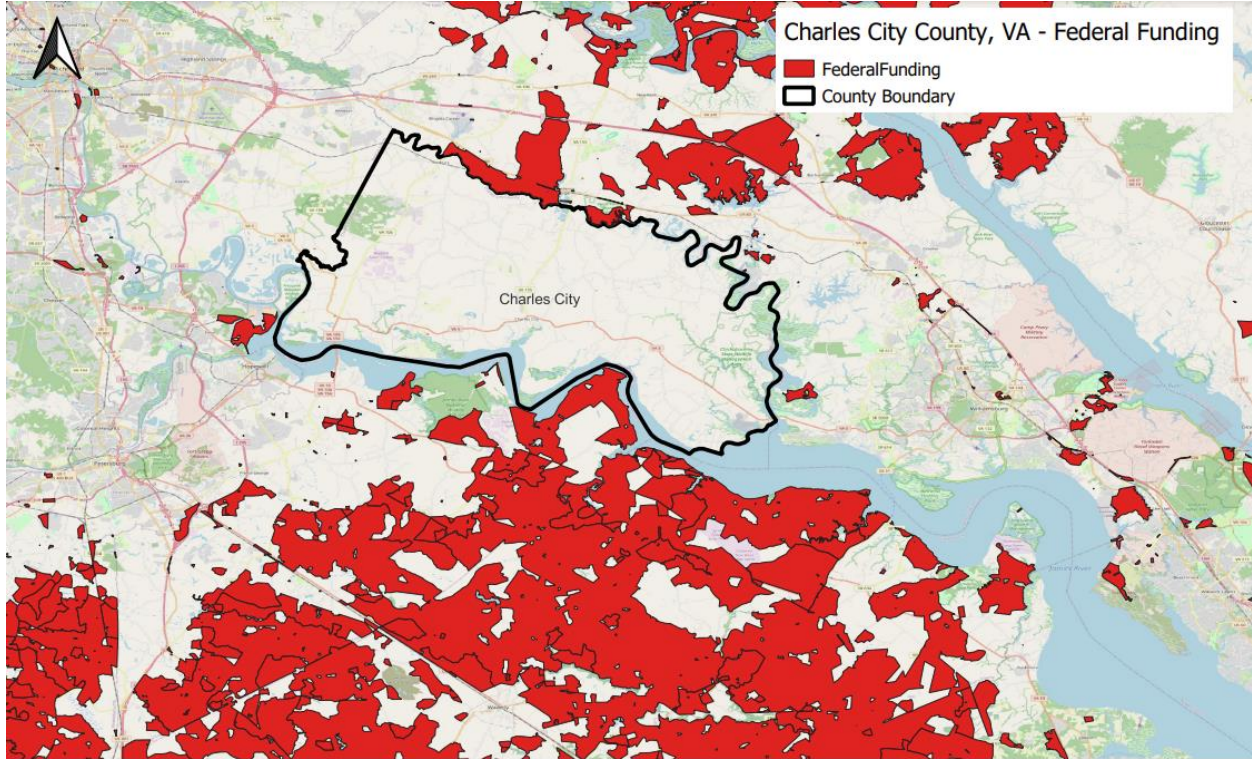
Attachment 1 – Project Area Map

Charles County – Project 2



Attachment 2 – Documentation of Federal Funding Area

Charles City County

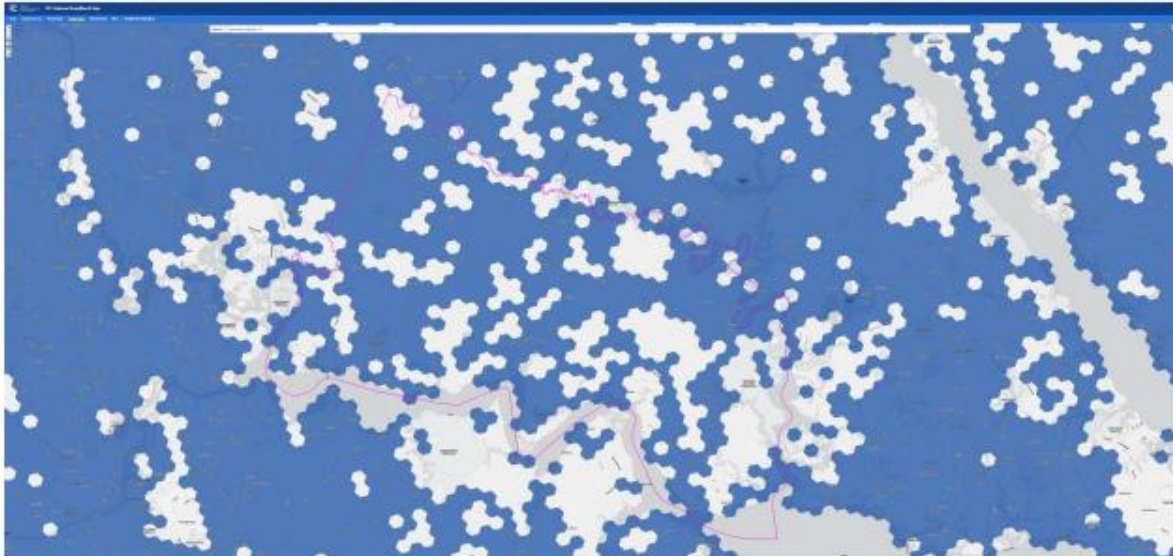


The map above notes no federal programs have issued awards in Charles City County, VA

Source: <https://fundingmap.fcc.gov/home> ; accessed December 13, 2023

Attachment 3 – Documentation Unserved Area VATI Criteria

Charles City County



Source: <https://broadbandmap.fcc.gov/area-summary> ; Accessed on December 16, 2023

Attachment 4 – Passings Form

Charles City County – Project 2

Type of Passing	Total Number of Passings in the Project Area	Passings in the Project Area, without Special Construction Costs Required	Passings with Special Construction Costs budgeted in the Application ¹	Number of Passings in Project Area with Speeds at 25/3 or below
Residential	382	0	382	368
Business	17	0	17	16
Community Anchor	0	0	0	0
Non-Residential	0	0	0	0
TOTAL	399	0	399	384

¹ Please refer to Section 6.c. and 6.d. in the “Project Description and Need” section of Comcast’s application for further explanation.

Attachment 5 – RDOF Awarded Areas included in VATI Application

Attachment 5 is not applicable to this grant application as there are no RDOF awarded areas included in the VATI Application.

Attachment 6 – Propagation Map (Wireless Projects only)

Attachment 6 is not applicable to this grant application.

Attachment 7 – Timeline Project Management Plan

Comcast has decades of experience building broadband networks and has a track record of success with completing projects on or ahead of schedule. Comcast’s employees and contractors have constructed and maintained thousands of miles of network infrastructure in Pennsylvania. Comcast has experience with estimating costs, designing, building, and operating systems in rural areas, including recent expansion to unserved areas.

Comcast has completed the planning and preliminary engineering phase for the proposed project. Final engineering, design and construction will commence upon execution of a final grant agreement if Comcast is awarded the grant. The initial tasks of design and construction include project engineering and right of way preparation. Given that Comcast already has facilities near the Project Area which it can leverage in this project, based on Comcast’s initial assessment, Comcast will be able to complete the project on a rolling basis within months of executing the grant agreement.

The chart below is for illustrative purposes only based on our current understanding of similar proposed projects, contains assumptions based on current market dynamics and is subject to change.

Estimated Project Management Schedule

Phase	Days	Month																	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Field Engineering - Phased	90																		
Design Engineering - Phased	90																		
Permitting - Phases	330																		
Materials Procurement - Phased	150																		
Make-Ready	390																		
Construction - Phased	420													33%			66%		100%
Community Awareness	360																		
Customer Installation - Phased	300									1 st Install									
Progress Reports	540																		
Project Closeout - Phased	210																		

Upon award notification and completion of a fully executed grant agreement, and contingent on obtaining a mutually acceptable franchise agreement, where required, Comcast and its contractors will complete the following project tasks:

Field Engineering – Phased

- Outside Plant / Walk-Out:
 - Comcast will complete a walk out and survey of the preliminary design route for the Project Areas. This visual review of the planned project route will help determine potential challenges for construction, pole profiling for permitting, and field measurements which will be utilized in the engineering design phase. Comcast typically follows utility routes such as power or telephone, whether they are aerial or underground.
 - With the completion of the project walk out, Comcast will determine if the proposed route (or segments of) will be constructed as underground if the aerial utility routes are deemed unfavorable or contain significant challenges that would result in excessive costs to construct.
 - Comcast will collect all utility pole information including existing attachment measurements and route information and prepare permit applications to pole owners, appropriate Right of Way (ROW) authorities.

Design Engineering – Phased

- Network:
 - Comcast will complete a detailed engineering package that includes the entire defined project build route and a list of all required materials to complete the project build.
 - The engineering package will consist of geospatial drawings of the physical route (aerial versus underground), list all physical structures and other possible obstructions, provide required materials and their physical placement, and note construction requirements to complete the project.
- Equipment and Materials:
 - Comcast will complete a full design to identify necessary equipment and materials to support delivery of all planned services from Comcast headend.

Permitting - Phased

- Network:
 - Comcast will obtain permits for all new utility pole attachments with appropriate pole owners.

- For any new permitted utility pole that is located on private property, Comcast will follow applicable state and federal regulations regarding utility easements.
- Comcast shall prepare and submit all other permits such as municipal, county, state, and railroad permits as required.
- Comcast will leverage existing pole attachment agreements with all the pole owning utilities in the project area. Having deployed over thousands of miles of plant in Pennsylvania, Comcast, has extensive experience working with pole owners and their processes to obtain the required permits to attach to poles. That being said pole permits, other permitting, and supply chain delays not reasonably anticipated by Comcast may pose a risk to timely completion, however, Comcast's extensive network of engineers, technicians, vendors, and partners provides an edge in ensuring a timely delivery of projects. For transparency, Comcast's project schedule incorporates the program's allowed extension periods should the standard permitting process extend beyond Comcast's reasonable expectations.

Materials Procurement – Phased

- Comcast will source and warehouse all required equipment and materials identified in the design engineering stage.

Make Ready – Phased

- Network:
 - Comcast will request pole engineering to evaluate if there are safety concerns and capacity for new pole attachment(s).
 - Comcast will obtain make-ready requirements and costs from pole owners to prepare the pole to accommodate the new pole attachment(s).
 - Comcast will pay applicable make-ready invoicing to prepare for the new pole attachment(s).
 - Once all make-ready construction has been completed, Comcast will obtain an attachment permit from the pole owner to commence construction.

Construction – Phased

- Network:
 - Once all applicable permits for Comcast have been issued, Comcast will complete all construction requirements as provided in the engineering package.

- Equipment:
 - Comcast will complete equipment installations within the Comcast headend if needed to support delivery of Comcast services.

Community Awareness – Phased

- Operations:
 - Comcast will initiate an outreach and communications plan to create service availability awareness for residences and businesses prior to construction release and will continue post-construction release.
 - Comcast will utilize a sales and marketing team to support construction efforts and a call center team that can address questions regarding Comcast's products and services. If conditions allow, a public meeting or event can be held in or near the Project Area to inform the residents about the upcoming work and answer questions.

Customer Installation – Phased

- Operations:
 - When construction is completed Comcast will release addresses from construction to sales and service systems
 - As residents order service from Comcast, Comcast will complete the installation, test, and turn-up of all customer premise equipment (CPE) at the residence or business to support the services.

Project Closeout – Phased

- Comcast will complete a full review of the completed construction against the engineering package to verify that all requirements have been completed.
- Comcast will complete a full review of all equipment and hardware to verify that all materials have been received and placed into service.
- Comcast will complete a final review of all vendor invoices against their completed work and materials to verify billing accuracy.
- Comcast will complete all closeouts to complete the project.

Throughout the duration of the project a dedicated Comcast team will be in contact providing status and answering any questions.

**AGREEMENT BETWEEN
GOVERNMENT
AND
COMCAST CABLE COMMUNICATIONS, LLC
FOR A BROADBAND EXPANSION PROJECT**

This Agreement is dated **DATE** (the “Effective Date”) between **Government** (the “**Government**”) and Comcast Cable Communications, LLC (“Comcast”), each a “Party” and, together, the “Parties.”

WHEREAS, the **Government** is authorized to expend American Rescue Plan Act (“ARPA”) funds to ensure that unserved residents and businesses in the **Government** have access to broadband in order to promote economic development within the Project Area; and

WHEREAS, Comcast provided an estimate of costs to support a “Project,” whereby Comcast will design, build, own, operate, manage and maintain a [**type of network**] cable network extension that will provide access to broadband internet service to certain unserved residents in the Project Area;

WHEREAS, the **Government** determined that the public interest is served by contracting with Comcast to bring broadband to certain residents in the Project Area; and

WHEREAS, the Parties intend to fund the Project as set forth in this Agreement.

Now THEREFORE, the Parties hereto do mutually agree as follows:

1. Definitions

- a) “Broadband Service” means high speed internet service capable of 100Mbps download and 20 Mbps upload speeds and be scalable to a minimum of 100Mbps symmetrical for download and upload speeds based on future technology advances.
- b) “Cable Franchise Agreement” means the grant of authority issued to Comcast by the **Entity** to own and operate its network in the public rights of way dated **DATE**.
- c) “Confidential Information” means, but is not limited to, information, drawings, data, specifications, technical information, and other information or materials furnished or made available by the disclosing Party to the receiving Party that reasonably should be considered proprietary and/or confidential and/or that the disclosing Party has indicated is proprietary and/or confidential.
- d) “Excusable Delay Event” means a delay that results from: (1) an event described in Section 18 of this Agreement that impacts Comcast’s ability to achieve Final Completion of the Project- including, but not limited to make-ready work that is not completed within six (6) months of Comcast's submission of a proper application for utility pole attachments.
- e) “Final Completion” means the date certified in writing by Comcast that construction of the Network has been completed by the Comcast and the locations in the Project Area

are Serviceable.

- f) “Network” means the [type of network] communications network extension that Comcast builds in the Government.
- g) “Project” means the work funded by the Parties under this Agreement.
- h) “Project Area” means the residential or business addresses intended to be served by the Network funded by the Project as set forth in Exhibit A.
- i) “Serviceable” means a location in the Project Area which has access to the Broadband Service, subject to the installation conditions of the Cable Franchise Agreement.

2. Notice of Federal Contract

The Government was awarded federal funds under ARPA and has elected to use a portion of such federal funds to provide contracts as part of the Project. This Agreement is considered a contract as defined in 2 CFR §200.1. As defined by 2 CFR §200.1, “contract” means “a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a Federal award.”

3. Term and Termination.

- a) This Agreement shall commence on the Effective Date and shall expire upon the date of Final Completion, unless terminated sooner in accordance with the provisions of this Agreement. Notwithstanding the forgoing, Comcast may terminate this Agreement at any time, with or without reason, at its convenience by giving the Government thirty (30) days prior written notice of such termination.
- b) This Agreement may be terminated for default for a breach of any one or more material terms of this Agreement that the breaching party fails to remedy in accordance with this section. In the event of a breach of one or more material terms of this Agreement, the non-breaching party must provide written notice of the breach(es) to the breaching party. In the event that the breaching party does not cure the breach(es) within thirty (30) calendar days from receipt of the non-breaching party’s written notice (or such longer time to which the Parties may agree), the non-breaching party may terminate this Agreement, in whole or in part.
- c) Termination of this Agreement by either Party as permitted herein shall not limit the legal rights and remedies otherwise available to either Party.

4. Project Description.

Comcast shall construct a Network capable of delivering Broadband Service to certain unserved premises in the Project Area. The Project Area includes NUMBER () residential/business premises that currently lack access to a reliable wireline connection that delivers broadband internet speeds, making said premises unserved according to the criteria

established by the U.S. Department of the Treasury (“Treasury”) pursuant to ARPA.

5. Performance of the Work.

- a) Comcast, a contractor defined under 2 CFR 200.331(b), will design, build, own, operate, manage and maintain the Network that will provide access to Broadband Service in the Project Area. Upon Final Completion, Comcast will operate the Network consistent with the terms of its Cable Franchise Agreement.
- b) Final Completion of the Project shall be within **MONTHS (1)** months after Comcast receives all required permits, other permissions or consent necessary for the Project; provided, however, that the date for Final Completion will be extended for each day of delay caused by the occurrence of an Excusable Delay Event. The Parties agree that they have a shared interest in pursuing options that would expedite the construction and completion of the Project in order to accelerate access to Broadband Service in the Project Area. In furtherance of this shared interest, the Parties shall cooperate to identify appropriate mechanisms to accelerate Project performance, including, but not limited to assisting in expediting the issuance of necessary permits.
- c) Comcast acknowledges that it is solely responsible for all Project decisions, the preparation of all plans and specifications, and for developing, performing, and completing the Project. As a contractor under this Agreement, the Parties agree that Comcast shall not be required to comply with the cost principles (2 CFR 200 Subpart E or 48 CFR Part 31) and the procurement practices (2 CFR 200.317-327 and 2 CFR Part 200 Appendix II) in 2 CFR Part 200.

6. Project Personnel.

Each Party shall provide written notice to the other Party within five (5) business days of the Effective Date identifying the person serving as each Party’s project manager to support effective communication and to report on the Project’s progress. Each Party’s notice shall also include the address, phone numbers, and email address for the Project Manager. In the event there is a change in a Party’s Project Manager, the affected Party shall provide (a) prompt written notice to the other Party of the change and (b) the new Project Manager’s contact information.

7. Ownership of Project and Service Requirements.

- a) Comcast shall retain ownership in and have exclusive use of the Network and all equipment used or deployed in connection with the Project. All right, title, and interest in the Network, including all equipment, supplies, or intangibles acquired or improved in connection with the Network shall vest in Comcast and such ownership is not conditional.
- b) Comcast shall operate and maintain the Network consistent with applicable industry standards and offer the Broadband Service Serviceable location in the Project Area under terms, conditions and prices reasonably consistent with what Comcast offers to its customers in the Project Area.

8. Payment.

- a) In consideration of Comcast's agreement to complete the Project, the **Government** shall pay to Comcast an amount of **AMOUNT** DOLLARS (\$) payable as set forth in Section 9. The **Government** represents and warrants that it is authorized to expend such funds and that it shall comply with any and all applicable laws related to the expenditure of such funds. Comcast shall not be required to offset any income received from the services it provides in the Project Area against any payment made by the **Government** to Comcast under this Agreement.
- b) Comcast contribute **AMOUNT** DOLLARS (\$) for the Project.
- c) As a contractor under this Agreement, the Parties agree that any income generated by Comcast from this Contract shall not be considered program income as defined in 2 CFR 200.1 and Comcast may use any income generated from this Contract without restriction. The Parties agree that income from indefeasible rights of use (IRUs) and leases relating to broadband infrastructure that Comcast receives shall not be considered program income as defined in 2 CFR 200.1.

9. Invoicing and Payment.

- a) Reporting/Payment Schedule
 - i. Comcast shall submit invoices for payment and Project status reports to the **Government** Project Manager.
 - ii. Comcast shall submit invoices, accompanied by a Project status report, with appropriate supporting documentation, to the **Government**, no more frequently than quarterly. Comcast shall be permitted to account for all cost expenditures submitted to the Government using its existing GAAP accounting standards and shall not be subject to cost accounting standards set forth in 2 CFR 200 Subpart E or 48 CFR Part 31.
 - iii. The **Government** shall pay Comcast within thirty (30) days of receipt of an invoice and Project status report.

10. Audit and Monitoring.

The Parties agree that Comcast, as a contractor under this Agreement, is not subject to the audit requirements at 2 CFR Part 200, Subpart F.

11. System for Award Management.

Comcast shall maintain an active System for Award Management (SAM) registration at all times while this Agreement is in effect.

12. Retention of Records

Records and accounts which support this Agreement shall be maintained for a period of three years pursuant to 2 CFR 200.334.

13. Confidentiality.

- a) The Parties agree that during and after the expiration or termination of this Agreement, neither Party, nor any person, firm, corporation or other entity affiliated with, owned in whole or in part by, employed by or otherwise connected with the receiving Party, shall directly or indirectly, without the express written consent of the disclosing Party, divulge, use, sell, exchange, furnish, give away, or transfer in any way the Confidential Information of the disclosing Party.
- b) The Parties agree that, during the term of this Agreement and for a period of three (3) years from the expiration or termination thereof, any Confidential Information received from the other Party:
 - i. Will only be used for the purpose of performing obligations and exercising rights under the Agreement;
 - ii. Will not be disclosed to any third party without prior written approval of the disclosing Party, except for disclosures to third parties that are expressly contemplated hereunder;
 - iii. May only be disclosed within the receiving Party's organization to employees that have a "need-to-know" such information in connection with the performance of the receiving Party's obligations under the Agreement and who have been advised of the obligations regarding Confidential Information under the Agreement;
 - iv. Will be treated with at least the same degree of care as the receiving Party treats its own Confidential Information, but in no event less than a reasonable degree of care;
 - v. Will be copied only to the extent necessary for the purposes of this Agreement; and
 - vi. Will remain the property of the disclosing Party.
- c) In the event that the receiving Party is served with a subpoena or other validly issued administrative or judicial process demanding the Confidential Information of the disclosing Party, the receiving Party shall promptly notify the disclosing Party so that the disclosing Party may seek a protective order or other remedy. The Parties shall reasonably cooperate with each other to quash such process or otherwise to limit the scope of any required disclosure. Unless the demand shall have been timely limited, quashed, or extended, the receiving Party shall be entitled to comply with such demand to the extent permitted by law. In the event that disclosure of any Confidential

Information is compelled, either Party shall seek an appropriate protective order from the court or administrative body to limit access to the Confidential Information.

- d) Upon the expiration or termination of this Agreement or upon the disclosing Party's request, the Contractor shall return all Confidential Information to the disclosing Party or at the disclosing Party's option, destroy all Confidential Information and provide, within ten (10) days of the disclosing Party's request, a written certification that all Confidential Information in all formats, including without limitation, paper, electronic and disk form, have been returned or destroyed, as the case may be.
- e) Each Party acknowledges that unauthorized disclosure or use of the other Party's Confidential Information could cause irreparable harm and significant injury to the disclosing Party that may be difficult to ascertain. Accordingly, each Party agrees that the disclosing party shall have the right to seek immediate injunctive relief from breach or threatened breach of this Agreement prohibiting any unauthorized disclosure or use of the Confidential Information, in addition to any other rights and remedies the disclosing Party may have.
- f) The confidentiality provisions of this section shall survive the termination or expiration of this Agreement.

14. Limitation of Liability.

- a) NOTWITHSTANDING ANY PROVISION IN THIS AGREEMENT TO THE CONTRARY, UNDER NO CIRCUMSTANCE OR LEGAL THEORY (TORT, CONTRACT OR OTHERWISE), SHALL COMCAST BE LIABLE TO THE GOVERNMENT FOR INDIRECT, EXEMPLARY, SPECIAL, OR CONSEQUENTIAL DAMAGES INCLUDING, BUT NOT LIMITED TO, LOSS OF REVENUE, PROFIT OR USE OR COST OF CAPITAL OR OF SUBSTITUTE USE OR PERFORMANCE (COLLECTIVELY "CONSEQUENTIAL DAMAGES"), ARISING UNDER THIS AGREEMENT, IRRESPECTIVE OF WHETHER OR NOT THE GOVERNMENT HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES.
- b) THE MAXIMUM LIABILITY OF COMCAST UNDER THIS AGREEMENT SHALL NOT EXCEED THE AMOUNT THE GOVERNMENT WILL PAY TO COMCAST AS SET FORTH IN SECTION 8.a OF THIS AGREEMENT.

15. Changes.

In the event the Government requests any change to the Project that causes an increase in the cost or time required for performance of the Project, Comcast shall notify the Government of such within thirty (30) calendar days from the date of receipt of the Government's written request. If the Parties agree to such changes in writing, the funding for the Project and the Final Completion date shall be equitably adjusted to incorporate such changes. Any request for work to be performed by Comcast outside the scope of this Agreement must be addressed under a separate agreement and be executed by the Parties prior to performance.

16. Assignment; Transfer.

Neither Party may assign this Agreement in whole or in part, or delegate any of its duties or obligations thereunder, without the prior written consent of the other Party, except that without such consent Comcast (i) may assign this Agreement to a successor (by purchase, merger, operation of law, or otherwise) to all or substantially all of its business; and (ii) may assign this Agreement to an affiliate or subsidiary, provided such entity agrees in writing to be bound by the terms hereof. Any purported assignment in contravention of this section shall be null and void. Subject to the foregoing, this Agreement will bind and inure to the benefit of any permitted successors or assigns. Nothing herein is intended to limit Comcast's use of third-party consultants and contractors to perform the Project.

17. Nondiscrimination.

Comcast agrees to comply with all applicable federal, state, and local statutes, rules and regulations promoting fair employment practices or prohibiting employment discrimination and unfair labor practices. Comcast shall not discriminate in the hiring of any applicant for employment nor shall any qualified Comcast employee be demoted, discharged or otherwise subject to discrimination in the tenure, position, promotional opportunities, wages benefits or terms and conditions of their employment because of race, color, national origin, ancestry, age, sex, religion, disability, handicap, sexual orientation, gender identification, or for exercising any rights afforded by law.

18. Excusable Delay Event.

Neither party shall be liable to the other or be deemed to be in breach of this Agreement for any failure or delay in rendering performance arising out of causes beyond its reasonable control and without its fault or negligence. Such causes may include, but are not limited to, delays in obtaining permits, permissions, or consents required for or associated with the Project, acts of God or of a public enemy, fires, floods, epidemics, quarantine restrictions, strikes, freight embargoes, or unusually severe weather.

19. Governing Law and Venue.

This Agreement shall be interpreted and enforced in accordance with the laws of the **JURISDICTION** without regard to its conflict of laws principles. Any dispute arising under this Agreement that is not settled between the Parties shall take place in any court of competent jurisdiction in the **JURISDICTION**. Each Party shall bear its respective legal costs. **TO THE FULLEST EXTENT PERMITTED BY APPLICABLE LAW, EACH PARTY IRREVOCABLY WAIVES ANY RIGHT IT MAY HAVE TO A TRIAL BY JURY IN CONNECTION WITH ANY LITIGATION ARISING OUT OF THIS AGREEMENT.**

20. Compliance With Laws.

- a) In general. The Parties agree to comply with all applicable local, state and federal laws, regulations, and ordinances in the performance of this Agreement.
- b) Other than those sections of 2 CFR 200 specifically cited in this Agreement, Comcast

shall only be required to comply with those sections of 2 CFR 200 Appendix II applicable to a for profit contractor.

- c) Prevailing wage laws. In the event Comcast is required to comply with a prevailing wage labor requirement, the **Government** acknowledges that it shall be the **Government**'s responsibility to provide Comcast with the specific wage determinations applicable to the work to be performed by Comcast under this Agreement that will be subject to such requirement. Any failure of the **Government** to do so that delays Comcast's performance under this Agreement shall be deemed an Excusable Delay Event.

21. Modification; Amendment.

This Agreement shall not be modified or amended, in whole or in part, except by written agreement signed by the Parties.

22. Survival.

The provisions of this Agreement that, by their sense and context, are intended to survive performance by either Party or the Parties shall also survive the completion, expiration, termination, or cancellation of this Agreement.

23. Headings; Exhibits.

The headings of paragraphs in this Agreement are for convenience only; they form no part of this Agreement and shall not affect its interpretation. All schedules, exhibits or attachments referred to in this Agreement shall be incorporated in and constitute a part of this Agreement.

24. Construction.

In the event that any portion of this Agreement is held to be invalid or unenforceable, the Parties shall replace the invalid or unenforceable portion with another provision that, as nearly as possible, reflects the original intention of the Parties, and the remainder of this Agreement shall remain in full force and effect.

25. Counterparts.

This Agreement may be executed and delivered in counterparts, all of which taken together shall constitute a single instrument.

26. Entire Understanding.

This Agreement constitutes the entire understanding of the parties related to the subject matter hereof, and supersedes all prior agreements, proposals, representations, statements, or understandings, whether written or oral, concerning the Project or the Parties' rights or obligations relating to the Project.

27. Waivers.

Conditions, covenants, duties and obligations contained in this Agreement may be waived only by written agreement executed by the Parties. Forbearance or indulgence in any form or manner by a Party shall not be construed as a waiver, nor in any way limit the remedies available to that Party.

28. Notice.

Any notice provided in accordance with this Agreement shall be in writing and shall be sent by electronic mail to the Project Manager with a copy to the individuals listed below.

Government:

Comcast:

with a copy to:

Comcast Cable Communications Management, LLC
One Comcast Center
1701 JFK Blvd.
Philadelphia, PA 19103
Attn.: Cable Law Department – Operations
Legal_Notices@comcast.com

Any notice shall be deemed delivered and received when submitted in writing in person or whendelivered by any other appropriate method evidencing actual receipt by the receiving party.

(Signature Approvals follow immediately below)

IN WITNESS WHEREOF, the Parties hereto have caused this Agreement to be executed by a duly authorized representative by their hands and seals, intending to be so bound, as of the day and year firstabove written.

ATTEST: _____

COMCAST CABLE COMMUNICATIONS, LLC

By: _____

Name: _____

Title: _____

ATTEST: _____

GOVERNMENT

By: _____

Name: _____

Title: _____

Attachment 9 – Funding Sources Table

Charles City County – Project 2

Please fill in the chart below with a description of the project funding source (local, federal, state, private, other), the amount from that source, the percentage of total project funding that source represents, and a description of the current status of the funds (pending, secured, etc.).

SOURCE	AMOUNT	%	STATUS
REQUESTED VATI	\$ 3,260,703	44%	Pending
PRIVATE	\$ 1,476,053	20%	CONFIRMED
RUS*	\$ 2,643,508	36%	Pending approval
TOTAL	\$ 7,380,264	100 %	

*Charles City County, with the support of Congressman McEachin, has been allocated \$2,643,508 in grant funding under the RUS ReConnect program through the Congressionally Directed Spending provisions. The County’s awarded application to RUS for the RUS grant funds described a partnership with Comcast to reach unserved areas included in this VATI application. Comcast, the County and RUS are in the process of negotiating an agreement under which the County and Comcast agree to the terms and conditions of the RUS grant program. Finalization of that agreement is contingent on Comcast receiving a waiver of certain provisions of the RUS Reconnect program.



December 18, 2023

Tamarah Holmes
Director, Office of Broadband
Virginia Department of Housing and Community Development
600 East Main Street, Suite 300
Richmond, VA 23219

Dear Ms. Holmes:

The purpose of this letter is to provide documentation regarding the in-kind contributions for the project proposed to the Virginia Telecommunication Initiative (“VATI”) program.

The proposed project represents a partnership between Comcast and Charles City County (“County”). As indicated in the applications, Comcast will provide approximately 33% of the projected construction costs of \$8,210,320 totaling \$2,709,406 for Project 1 and 20% of the projected construction costs of \$7,380,264 totaling \$1,476,053 for Project 2.

In addition, with the support of Congressman McEachin, the County has been allocated \$2,643,508 in grant funding under RUS Reconnect for Congressionally Directed Spending projects. The County’s RUS application described a partnership with Comcast to reach unserved areas included in this VATI application. If VATI funding is awarded to Project 2, and contingent upon negotiation of a grant agreement on mutually agreeable terms, the County will contribute \$2,643,508 in matching funds to the project lessening the amount requested from DHCD under VATI.

Should you have any questions regarding the information above, please do not hesitate to contact me or Kevin Broadhurst at 302-661-4420 or kevin_broadhurst@comcast.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Raymon Roundtree".

Raymon Roundtree
Regional Senior Vice President
Beltway Region

Attachment 11 – Prior Expended Match Form

Attachment 11 is not applicable to this grant application.

Attachment 12 – Derivation of Costs (Project Budget)

Charles County – Project 2

Project Phase	Total	VATI	Non-VATI	Source of Estimate	Date
New Equipment/ Materials	[Redacted]	[Redacted]	[Redacted]	Comcast	12/14/23
New Construction	[Redacted]	[Redacted]	[Redacted]	Comcast	12/14/23
Engineering/ Design	[Redacted]	[Redacted]	[Redacted]	Comcast	12/14/23
Permits/Make Ready	[Redacted]	[Redacted]	[Redacted]	Comcast	12/14/23
Surveys	[Redacted]	[Redacted]	[Redacted]	Comcast	12/14/23
Total	\$7,380,264	\$3,260,703	\$4,119,561		

Schedule F-2

Project Construction Budget

Budget Category Budget Line Item	Unit	No. of Units	Unit cost	Total	Grant	Match	Other Funding *	Description
BROADBAND NETWORK								Note: These items are general in nature, applicants should modify as required to describe their specific project.
Electronic Equipment (cabinets, switches, routers, wireless radios, etc.)	Electronic Equipmen	See below (Total)	See below (Total)	\$			\$	
<i>Provide specific type of equipment to be funded</i>	EA							
SERVICE POWER INSERTER. For XM or XM2 Series. PN# 020-019-31(SPI-XM). ALPHA	EA	1						POWER SUPPLY ACCESSORIES
FOSC B6 Closure No Splice Trays	EA	77						FIBER SPLICE ENCLOSURES
FOSC 450 B & BS Splice Tray Kit - 24-fiber capacity	EA	77						FIBER SPLICE ENCLOSURES
FIBER SPLICE SLEEVE. SINGLE. 62 MM. FOSC ACC. RN# SMOUV1120-01. PN# 693979. RAYCHEM. 100 PER PACKAGE	EA	9						FIBER OPTIC SPLICES
24X42X76. Super vented. PEDESTAL NODE HDPE	EA	1						PEDESTALS
24X42X76 LIGHT GRREN 7/16 LOCK ARMORCAST. P6001260ACH	EA	1						VAULTS
Vault 30x48 36 deep bolt down with Shield lid Comcast logo	EA	189						VAULTS
Vault 24x36 24 deep bolt down with Shield lid Comcast logo	EA	4						VAULTS
VAULT W/L BOLT SPLIT-LID W/ 1010 PLUG (NO PED) HDPE LID/BODY 24 X 36 X 24 PN# SGLB2436241B410. CHANNEL	EA	4						VAULTS
Optimus Pedestal Insert 10103 (18) with two Fiber Tap Brackets LB1 lock Lt. Green anti insect vents ground	EA	4						VAULTS
12.5 Volt Valve Regulated Lead Acid 240 Runtime Minutes Standby Power Supply Battery Pink Comcast Embossed Pure Lead	EA	3						BATTERIES - POWER SUPPLY
50-90 VAC. POWER INSERTER POWER SWITCH MULTIFUNCTION. PN# ST11 SPSM. SMART TECH 21 INC. DIE CAST ALUM. CDV POWERING	EA	1						POWER INSERTERS
BATTERY CABLE KIT. XM/XM2 90V SERIES. PN# BCK-HD(874-202-20). ALPHA	EA	1						POWER SUPPLY ACCESSORIES
GROUND MOUNTED. ENCLOSURE. 3 BATTERY. 120V. 80A. W/BX-BTB AND EA-P-120	EA	1						POWER SUPPLY CABINETS
PRECAST PAD 44 X 27 UPE SERIES PCO replaces CIFA 16440 & 16441	EA	1						POWER SUPPLY CABINETS
XM3 Power Supply 1620W (18A at 90V 60V option) 120VAC Embedded DOCSIS Transponder-DM3 APPS card and Smart AlphaGuard 1 or 2 string	EA	1						POWER SUPPLY
SAG harness-wire kit. 3 battery. for XM3. 873-848-20. PN# SAG-BSC-3	EA	1						POWER SUPPLY ACCESSORIES
1x4 Field Installable Optical Splitter Component	EA	4						FIBER OPTIC SPLITTERS
FLM Housing	EA	1						FLM Housing
Modules	EA	4						Modules
Place New Ground Mounted Power Supply	Per Each Power Supply	1						Labor
Install Misc	Per Each Misc	4						Labor
Power Supply Meter Installation	Each Per Quote	1						Labor
Outside plant (fiber, coaxial, copper, etc.)	All Outside plant	See below (Total)	See below (Total)	\$			\$	
<i>Provide specific types of material to be funded</i>	LF							
5/8 INCH SQUARE NUT. HOT DIP GALVANIZED	EA	1,140						NUTS
GUY ATTACHMENT. FORMED STEEL ONE BOLT. 2 X 3/16 INCH 11/16 HOLE. HOT DIP GALVANIZED	EA	114						GUY ATTACHMENTS
CABLE IN CONDUIT. .625 INCH. P3 CABLE. IN 2 INCH CONDUIT. SCHEDULE 40. TERRA COTTA	FT	35						CONDUIT
CONDUIT INNERDUCT 2 SCH 40 TERRA COTTA W/1100 LB PULL TAPE	FT	152,057						CONDUIT
SERVICE MAST DEADEND. STRAP. 1 INCH TO 4 INCH DIA. G90 GALVANIZED STEEL. DROP CABLE DEADEND ATTACHMENT	EA	114						STRAPS
7/8 INCH X 6 FOOT. SUBSCRIBER TERMINAL. DROP TUBING. RISER. GRAY PLASTIC. 1/2 I.D.	EA	114						GUARDS
96 FIBER. SINGLE MODE (ITU G.652.D). RIBBON CABLE. SA/SJ. 12F/RIBBON. GEL FREE TUBE. 0.35/0.35/0.25 dB/km at 1310/1383/1550 nm (1383 nm uncabled)	FT	464,569						FIBER RIBBON
144 Count Low Water Peak Loose Fibers. Dry Core and Dry Tube Epoxy Glass or Equiv Strength Member 600 Pounds; Tensile Strength Single Armor-Single Jacket .35/.25dB/km@1310/1550nm	FT	36,432						FIBER
STRAPS LASHING STAINLESS STEEL FOR STRAND-MOUNTING FOSC 400 CLOSURES	EA	77						STRAPS
ANCHOR SCREW TRIPLEYE 6"	EA	114						GUY ATTACHMENTS
MACHINE. BOLT. 5/8 X 16 INCH. HOT DIP GALVANIZED	EA	1,140						BOLTS
5/8 INCH X 8 FEET. GROUND ROD. BONDED COPPER. UL LISTED	EA	2						GROUND ROD
GROUND CLAMP. 5/8 GROUND ROD. HEX HEAD BOLT. 1/0 STR-3 SOL. HEAVY DUTY. UL LISTED	EA	3						CLAMPS
SPLICE STRAND 1/4 STRAND 35 LONG	EA	114						STRAND SPLICES
SPLIT BOLT CONNECTOR (#3). 2-#8 SOLID TO #2 SOLID. #14 SOLID MIN TAP WIRE SIZE. UL LISTED	EA	1,140						SPLIT BOLT CONNECTORS
1/4 INCH. STRAND. EXTRA HIGH STRENGTH CLASS C COATING. COASTAL. 7 WIRE. .080 WIRE DIAMETER. 5000 FT REEL	EA	285,102						STRAND
WASHER. SQUARE. 2 X 1/8 INCH. 11/16 INCH HOLE SIZE. HOT DIP GALVANIZED	EA	2,281						WASHERS
0.045. LASHING WIRE. 302. STAINLESS STEEL	CX	475						LASHING WIRE
LOCK. HIDDEN SHACKLE PADLOCK. KEY NUMBER 412K241	EA	4						LOCKS

2 INCH X 8 FEET, U FLANGED, RISER, GUARD, IVORY, PLASTIC	EA	114							GUARDS
Composite New Greenfield Residential (SDU/MDU) Aerial Construction	Per CBS Ft	285,102							Labor
Composite New Greenfield (SDU/MDU) Underground 4 Directional Bore Construction for Coax/Fiber	Per Bore Ft	150,551							Labor
Splice Loose Tube Fiber (Per Fusion 5-12)	Per Each Fiber	846							Labor
FLM Optimization	Each	1							Labor
Test and Tag MST Port	Per Each	399							Labor
Mount/Install/Setup MST	Per Each	12							Labor
Install New Splice Enclosure - Aerial	Per Each	50							Labor
Install New Splice Enclosure - Underground	Per Each	26							Labor
Rock Aider	Foot	17,928							Labor
Bid Work - Bury Fiber Drop Conduit 12	Quote	23,940							Labor
Customer Drops									
Provide a description of drop material to be funded	LF								
Customer premises equipment									
Provide a description of CPE to be funded	EA								
Towers - new or upgraded New towers constructed must be owned by applicant									Not Grant Eligible
Provide description of tower study or structural improvement to be funded	EA								Not Grant Eligible
									Not Grant Eligible
Buildings - new construction or renovation	EA								Not Grant or Match Eligible
Provide description of building purchase or improvement to be funded									Not Grant or Match Eligible
									Not Grant or Match Eligible
Bandwidth Costs									Not Grant Eligible
Provide the credit being provided by MdBC for the use of their infrastructure	LS								Not Grant Eligible
									Not Grant Eligible
Engineering	All Engineering	See below (Total)	See below (Total)	\$		\$			
Engineering costs must be tied to a Funded Capital Asset	LS								
Walkout and Field Verification of Existing Outside Plant - Coax and/or Fiber - Large Upgrade Projects > 20 000 ft.	Foot	435,653							Walkout Costs
Walkout for Permit Fielding <300' Complex	Each	1							Walkout Costs
Walkout for Permit Fielding Aerial	Each	1,140							Walkout Costs
Walkout for Permit Fielding greater than 300' Complex Underground	Foot	150,251							Walkout Costs
Walkout and Fielding for Power Supply Permit	Each	1							Walkout Costs
Permit Application within 300' Complex	Each	1							Permit Costs
Permit Application greater than 300' Complex Aerial	Each	1,140							Permit Costs
Permit Application greater than 300' Complex Underground	Foot	150,251							Permit Costs
Power Supply Permit Applications	Each	1							Permit Costs
Permit Payments Through 3rd Party - Make Ready	Aerial Miles	54							Permit Costs
Drafting Base Map Strand and Trench Information - Large Upgrade Projects > 20 000 ft.	Foot	435,653							Design Costs
System Design - Fiber - Large Upgrade Projects > 20 000 ft.	Foot	31,680							Design Costs
As-Built - Coax/Fiber - Large Upgrade Projects > 20 000 ft.	Foot	435,653							Design Costs
FTTP SFU Design/Draft - Fiber (VHUB Forward) - Base per project <2 000'	Each	1							Design Costs

FTTP SFU Design/Draft - Fiber (VHUB Forward) - Base per project - Base + per foot >2 000'	Foot	401,973						Design Costs
	Hourly	5						Design Costs
Add lines as necessary to provide a full construction budget for the constructed network								
Total Broadband System			7,380,264.00	3,260,703.00	1,476,053.00	2,643,508.00		
OTHER CONSTRUCTION RELATED COSTS								
Provide a complete description of Other construction related costs								
Total Other Costs			0.00	0.00	0.00	0.00		
SUMMARY OF EXPENDITURES								
Broadband System			7,380,264.00	3,260,703.00	1,476,053.00	2,643,508.00		
Other			0.00	0.00	0.00	0.00		
TOTAL PROJECT CONSTRUCTION COSTS			7,380,264.00	3,260,703.00	1,476,053.00	2,643,508.00		

* to be used for ineligible items necessary for the project

*Comcast will invoice for any Network Infrastructure Grant Program projects on a reimbursement basis. A reimbursement voucher(s) would include a detailed materials list, copies of vendor invoices, and documentation of payment of Comcast expenses. Reimbursement vouchers may include confidential and proprietary information which Comcast would submit following applicable program guidelines and law."



COMMONWEALTH OF VIRGINIA

HOUSE OF DELEGATES
RICHMOND

DELORES L. MCQUINN

POST OFFICE BOX 406

RICHMOND, VIRGINIA 23218

COMMITTEE ASSIGNMENTS:

EDUCATION

TRANSPORTATION

December 1, 2023

Mr. Brian Ham, Director
Department of Housing and Community Development (DHCD)
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Director Ham,

I write to bring to your attention an application from Charles City County for grant funding through the 2024 Virginia Telecommunication Initiative (VATI) Broadband Grant Program. I ask for your full and fair consideration of their request.

Charles City County proposes to partner with Comcast, to complete the buildout of fiber infrastructure to provide access to District Three constituents not serviced by previous grant initiatives and households previously excluded because they are more than 350' from public roads. Comcast proposes to extend its network so that homes and businesses in the project area are serviceable with broadband speeds of up to 1.2 gigabit per second ("Gbps") over a hybrid fiber coaxial network for residential customers and 10 Gbps for Business customers. An estimated 2,900 additional households and businesses would be serviced within the proposed project scope.

I have had the pleasure of representing Charles City County and have come to know intimately the unique challenges of the area; a need for broadband expansion has long been at the forefront.

Broadband access is crucial to our students and workers' success, for new employment opportunities, telehealth medicine, and so much more. As a legislator during this unprecedented time, I am committing to advocating for additional resources to connect our communities and make them stronger. Again, I ask for your full and fair consideration of Charles City County for grant funding through the Virginia Telecommunication Initiative grant.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McQuinn", enclosed in a rectangular box.

Delegate Delores L. McQuinn
70th District
House of Delegates

CONGRESSWOMAN JENNIFER MCGLELLAN
4TH DISTRICT, VIRGINIA

2417 RAYBURN HOB
WASHINGTON, DC 20515

11 S. 12TH STREET, SUITE 401
RICHMOND, VA 23219



HOUSE ARMED SERVICES COMMITTEE
SUBCOMMITTEES
SEAPOWERS AND PROJECTION FORCES
INTELLIGENCE AND SPECIAL OPERATIONS

HOUSE COMMITTEE ON SCIENCE,
SPACE, & TECHNOLOGY
SUBCOMMITTEE
SPACE AND AERONAUTICS

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
WASHINGTON, D.C. 20515

December 8, 2023

Mr. Brian Ham, Director
Department of Housing and Community Development (DHCD)
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Director Ham,

I write to ask your consideration of Charles City County for grant funding through the 2024 Virginia Telecommunication Initiative (VATI) Broadband Grant Program. I ask for your full and fair consideration of their request.

Charles City County proposes to partner with Comcast, to complete the buildout of fiber infrastructure to provide access to District Three constituents not serviced by previous grant initiatives and households previously excluded because they are more than 350 feet from public roads. Comcast proposes to extend its network so that homes and businesses in the project area are serviceable with broadband speeds of up to 1.2 gigabit per second ("Gbps") over a hybrid fiber coaxial network for residential customers and 10 Gbps for Business customers. An estimated 2,900 additional households and businesses would be serviced within the proposed project scope.

I have represented Charles City County as a legislator on both the state and federal levels, and intimately understand the unique challenges facing the area, including the critical need for broadband expansion. Broadband access is crucial to our students and workers' success, for new employment opportunities, telehealth medicine, and so much more. As a legislator during this unprecedented time, I am committing to advocating for additional resources to connect our communities and make them stronger. Again, I ask for your full and fair consideration of Charles City County for grant funding through the Virginia Telecommunication Initiative grant.

Sincerely,

A handwritten signature in black ink that reads "Jennifer L. McClellan".

Jennifer L. McClellan
Member of Congress



Chickahominy Indian Tribe

8200 Lott Cary Road, Providence Forge, Virginia 23140
Ph: (804) 829-2027

Tribal Council

December 18, 2023

Bryan Horn, Director
Virginia Department of Housing and Community Development
600 East Main Street, Suite 300
Richmond, VA 23219-2430

*Stephen R. Adkins,
Chief*

*Wayne B. Adkins,
1st Asst. Chief*

*Reginald C. Stewart,
2nd Asst. Chief*

*Vanessa Y. Adkins,
Secretary*

*Rhonda G. Canaday,
Treasurer*

Adam L. Adkins

Camille D. Adkins

Heath W. Adkins

E. Preston Adkins

Troy L. Adkins

Ross A. Stewart

Donovan L. Wynn

Dear Mr. Horn,

I am writing to express support from the Chickahominy Indian Tribe for the application from Charles City County for grant funding through the 2024 Virginia Telecommunication Initiative (VATI) Broadband Grant Program.

Charles City County proposes to partner with Comcast to complete buildout of broadband infrastructure to unserved and underserved residents of the County. I support the proposed project and request that the Department of Housing and Community Development approve the application so all residents, including members of the Chickahominy Tribe can benefit from broadband service. This project will significantly improve the quality of life for residents impacted by the lack of high-speed internet access by facilitating remote work, access to telemedicine, and educational and job opportunities. The Chickahominy Tribe has been engaged with Comcast and the County on this effort and is confident that approval of this project will drastically reduce the rural digital divide for members of our tribe and the larger Charles City County Community.

Comcast recently awarded \$25,000, provided 100 laptops and installed a Lift Zone to support the Chickahominy Indian Tribe with free, high-speed WiFi to help its tribal citizens with digital literacy and skills training. These donations are part of Project UP, Comcast's \$1 billion commitment to advance digital equity through programs and community partnerships that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers and creators. CodeVA, a Richmond-based non-profit that provides computer science education, and that also partners with the Virginia Tribal Education Consortium (VTEC), will use the \$25,000 grant to teach senior tribal citizens the digital literacy skills needed to stay connected and succeed in today's digital world.

Thank you for your time and consideration of Charles City County's VATI application. If you have any further questions or concerns related to this letter, please feel free to contact me at 804-387-8926.

Sincerely,

A handwritten signature in blue ink that reads "Reggie Stewart". The signature is written in a cursive style with a light blue background behind the text.

Reggie Stewart
Chickahominy Indian Tribe

Attachment 15 – Two most recent Form 477 submitted to the FCC or equivalent

As required by the Federal Communications Commission (FCC), Comcast has submitted the Form 477 data for each year since the FCC began collecting the data and Comcast was obligated to file. Information regarding Comcast's two most recent Form 477 submissions to the FCC can be located at

<https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477>.

Attachment 17 – RSSI Projection Shapefiles

Attachment 17 is not applicable to this grant application.



COMMONWEALTH OF VIRGINIA
COUNTY *of* CHARLES
CITY
P.O. Box 128 Charles City,
Virginia 23030

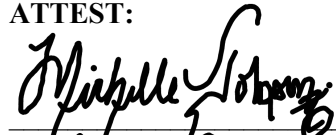
Resolution 2024
Charles City County, Virginia FY24 VATI
Virginia Department of Housing and Community Development

- WHEREAS:** Charles City County has overwhelming support from residents and the business community to provide broadband services to all residential and business properties countywide;
- WHEREAS:** The provision of fiber based broadband infrastructure countywide is one of the County's highest priorities as it pertains to equalizing education, Et. Al opportunities, creating jobs, and enhancing the quality of life for Charles City constituents;
- WHEREAS:** The Project fits into the County's local broadband plan and its funding would represent 100% coverage countywide. 100% fiber-based infrastructure would be transformation for Charles City County because broadband is a necessity for the community to attract business, for students to use educational resources, and for access to opportunities like healthcare;
- WHEREAS:** Charles City County proposes to partner with Comcast, to complete the buildout of fiber infrastructure to provide access to District Three constituents not serviced by previous grant initiatives and households previously excluded because they are more than 350' from public roads. Comcast proposes to extend its network so that homes and businesses in the project area are serviceable with broadband speeds of up to 1.2 gigabit per second ("Gbps") over a hybrid fiber coaxial network for residential customers and 10 Gbps for Business customers. An estimated 2,900 additional households and businesses would be serviced within the proposed project scope;
- WHEREAS:** Charles City County is the recipient of an award for more than \$2.5 million for broadband expansion in the County in the 2022 House Appropriations Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies bill, that will be appropriated as match funds for the FY23 VATI grant application; and
- WHEREAS:** Comcast has committed to contribute match funds in support of the FY24 Virginia Telecommunications Initiative;

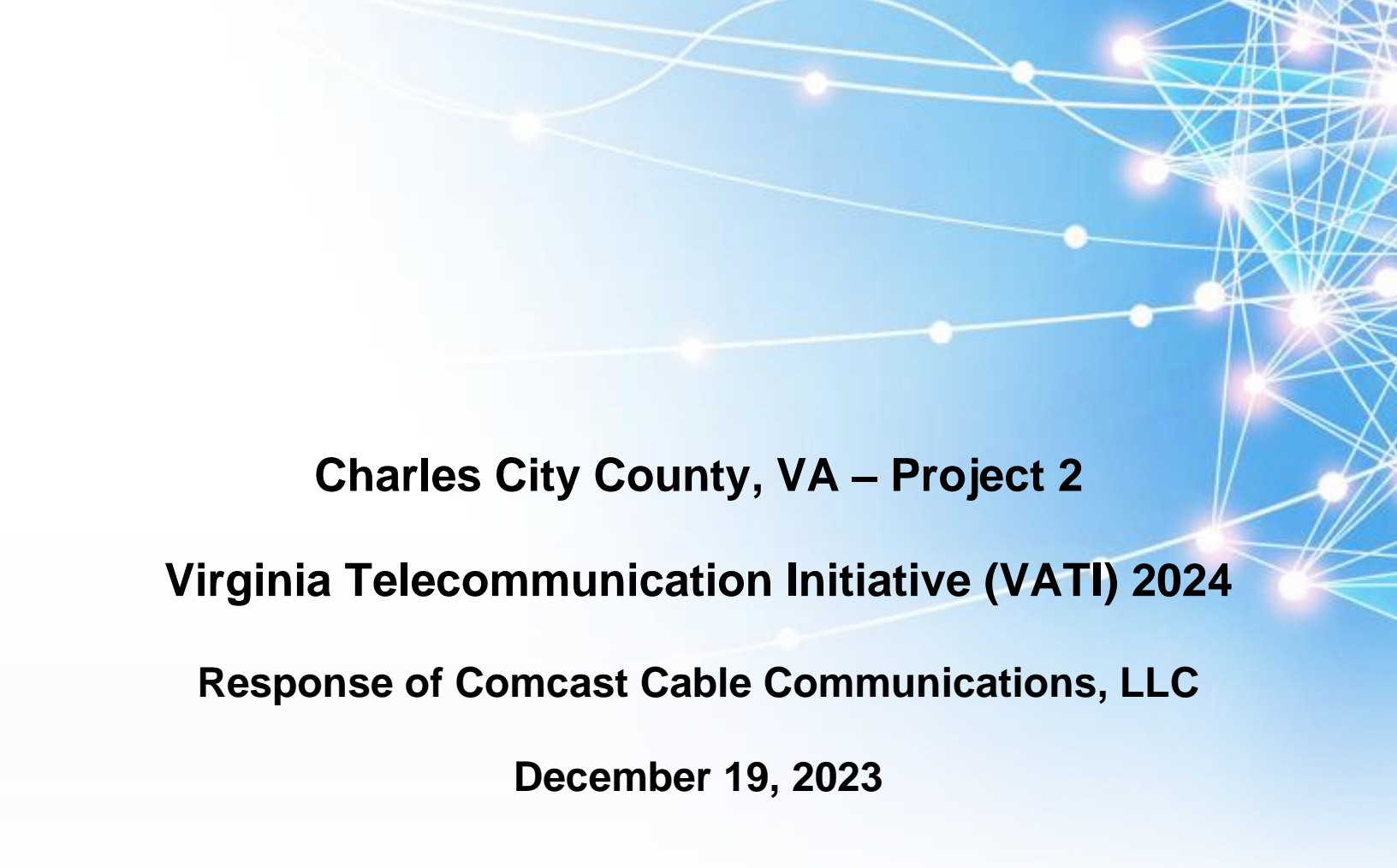
NOW, THEREFORE BE IT RESOLVED, that Charles City County states its intent to authorize the submission of the FY25 Virginia Department of Housing and Community Development (VATI) proposal.

BE IT FURTHER RESOLVED that Ms. Michelle Johnson, County Administrator, is hereby authorized to sign and submit appropriate documents for the submittal of the Virginia Telecommunications Initiative proposal and any subsequent contract documents to satisfy program requirements.

ATTEST:

A handwritten signature in black ink, appearing to read "Michelle Johnson", written over a horizontal line.

Michelle Johnson, County Administrator
Clerk, Charles City County Board of Supervisors

A network diagram background with glowing nodes and connecting lines in shades of blue and white, set against a light blue gradient.

Charles City County, VA – Project 2
Virginia Telecommunication Initiative (VATI) 2024
Response of Comcast Cable Communications, LLC
December 19, 2023

COMCAST
BUSINESS

xfinity

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Project Description and Need

- 1. Describe why and how the project area(s) was selected. Describe the proposed geographic area including specific boundaries of the project area (e.g., street names, local and regional boundaries, etc.). Attach a copy of the map of your project area(s). Label map: Attachment 1 – Project Area Map.*

Charles City County (“County”) and Comcast Cable Communications, LLC (“Comcast”¹) appreciate the opportunity to respond to the Commonwealth of Virginia’s Department of Housing and Community Development’s (“DHCD”) Virginia Telecommunication Initiative (“VATI”) with respect to deploying broadband infrastructure to eligible service areas in the County (“Project Area”). As detailed further below, Comcast and the County propose to deploy qualifying broadband service to 399 households in the Project Area (the “Project”).

The Project’s geographic area includes approximately 77 miles of infrastructure throughout the Comcast service area and other adjacent areas, which do not already have access to broadband service, as noted on the attached Project Area Map (Attachment 1) and further detailed below.

The Project Area was selected based on a review of the Federal Communication Commission’s (“FCC”) Broadband Data Collection (“BDC”) and other publicly available information, and Comcast’s internal data. After consultation between the County and Comcast, the Project meets eligibility criteria established by the Virginia General Assembly and DHCD for a VATI award. Because VATI eligibility criteria is more restrictive than some federal programs, the Project also meets eligibility criteria for the Coronavirus State and Local Fiscal Recovery Fund (“SLFRF”) and the Capital Projects Fund (“CPF”) established under the American Rescue Plan Act of 2021 (“ARPA”).

¹**Note:** Comcast Cable Communications, LLC is a wholly owned indirect subsidiary of Comcast Corporation. Comcast Corporation is a publicly traded company that through its cable division subsidiaries, including, but not limited to Comcast Cable Communications, LLC, provides cable television, voice and internet services. For the purposes of this response, the term “Comcast” throughout this response may refer to Comcast Corporation, Comcast Cable Communications, LLC, or the Comcast Corporation cable division operating Comcast subsidiaries or affiliates holding cable television franchises in the relevant jurisdictions. In the event of a grant award, for the avoidance of any doubt, the contracting entity for Comcast will be Comcast Cable Communications, LLC and all grant obligations binding upon Comcast Cable Communications, LLC must be agreed to in a separate writing between the parties.

Comcast proposes to extend its network so that homes and businesses in the Project Area are serviceable with broadband speeds that reliably meet or exceed 100 Mbps download and at least 20 Mbps upload speeds **[Redacted]**.

The proposed project will provide fiber-based internet infrastructure and service to Charles City County constituents in Voting District Three and service laterals for all structures that were not previously served. The focus on Voting District three is due in part to the areas limited implementation in FY20. The FY20 Charles City County VATI grant was able to partially implement broadband infrastructure via a Virginia Technology Initiative Grant in 2020 that excluded significant areas in Voting District Three.

Additional project selection priorities included soliciting community engagement. The County has received many comments from citizens and businesses on the lack of broadband in certain areas of the County. Additionally, the County has worked to identify areas where broadband service is needed. This information led to the development of a broadband plan that identifies unserved areas of the County that should be targeted for internet service.

District Three is unserved based on data available through the Federal Communications Commission and Charles City County Census data. District Three is bounded by the James and Chickahominy Rivers, Adkins Road/State Route 618. It has the largest land area of the County's three voting districts, which made the cost per unit to service households in the district prohibitive for a prior grant award for fiber infrastructure deployment. The geographic area for this proposed project includes approximately 100 miles of infrastructure generally dispersed throughout Voting District Three of the County, as noted on the attached Project Area map. The area represents the largest of the three voting districts, hosting a population of 2,435, 58% representing minorities.

The Project Area targets a significant portion of remaining locations that are currently unserved throughout the County. Comcast currently offers service to approximately **[Redacted]** premises in the County. The Project will greatly improve broadband coverage in the County, and funding for the two applications submitted by the County would provide near ubiquitous broadband coverage to County residents.

While the County understands that funding from the Broadband Equity, Access and Deployment ("BEAD") Program will be available in the future, speed of deployment is crucial for these residents. The proposed VATI Project could be completed within 18 months, providing broadband service and improving the quality of life for residents in this disadvantaged part of the County. The application also leverages ReConnect funds which were appropriated by Congress to support the expansion of broadband services

in Charles City County. Inflation continues to decrease the value of that ReConnect grant, so the County is eager to leverage these funds to finally accomplish our goal of universal broadband service. An approved VATI grant will also accelerate the digital equity work of the Chickahominy tribe that is being supported by Comcast and Code VA. Comcast recently awarded \$25,000, provided 100 laptops, and installed a Lift Zone to support the Chickahominy Indian Tribe with free, high-speed WiFi to help its tribal citizens with digital literacy and skills training. These donations are part of Project UP, Comcast's \$1 billion commitment to advance digital equity through programs and community partnerships that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators. CodeVA, a Richmond-based non-profit that provides computer science education, and that also partners with the Virginia Tribal Education Consortium (VTEC), will use the \$25,000 grant to teach senior tribal citizens the digital literacy skills needed to stay connected and succeed in today's digital world.

- 2. List existing providers in the proposed project area and the speeds offered. Describe your outreach efforts to identify existing providers and how this information was compiled with source(s).*

To the best of Comcast's and the County's collective knowledge and based on publicly available data and Comcast's internal database systems and tools, there are no existing providers of qualifying broadband in the Project Area to render any part of the Project Area ineligible for a VATI award. Comcast provides service to areas adjacent to the Project.

- 3. Describe if any areas near the project have received funding from federal grant programs, including but not limited to Connect America Funds II (CAF II), ACAM, ReConnect, Community Connect, and Rural Digital Opportunity Funds (RDOF). If there have been federal funds awarded near the project area(s), provide a map showing these areas, verifying the proposed project area does not conflict with these areas. Label Map: Attachment 2 – Documentation on Federal Funding Area.*

To the best of Comcast's and the County's knowledge, no areas within or immediately adjacent to the Project Area have received funding from federal grant programs such as CAF II, ACAM, RDOF, ReConnect, and Community Connect, as noted on Attachment 2 – Documentation on Federal Funding Area.

Charles City County, with the support of Congressman McEachin, has been allocated \$2,643,508 in grant funding under the RUS ReConnect program through the

Congressionally Directed Spending provisions. The County's awarded application to RUS for the RUS grant funds described a partnership with Comcast to reach unserved areas included in this VATI application. Comcast, the County and RUS are in the process of negotiating an agreement under which the County and Comcast agree to the terms and conditions of the RUS grant program. Finalization of that agreement is contingent on Comcast receiving a waiver of certain provisions of the RUS Reconnect program. If the RUS agreement is executed, the County will contribute \$2,643,508 in matching funds to the project.

4. *Overlap: To be eligible for VATI, applicants must demonstrate that the proposed project area(s) is unserved. An unserved area is defined as an area with speeds below 100/20 Mbps and with less than 25% service overlap within the project area for wireless projects and 20% for wireline projects. Describe any anticipated service overlap with current providers within the project area. Provide a detailed explanation as to how you determined the percentage overlap. Label Attachment: Attachment 3 – Documentation Unserved Area VATI Criteria.*

Comcast and the County anticipate no overlap of other ISP service areas within the Project Area. As noted above, the Project Area was selected based on a review of the Federal Communication Commission's ("FCC") Broadband Data Collection ("BDC") and other publicly available information, and Comcast's internal data. After consultation between the County and Comcast, the Project meets eligibility criteria established by the Virginia General Assembly and DHCD for a VATI award. Because VATI eligibility criteria is more restrictive than some federal programs, the Project also meets eligibility criteria for the Coronavirus State and Local Fiscal Recovery Fund ("SLFRF") and the Capital Projects Fund ("CPF") established under the American Rescue Plan Act of 2021 ("ARPA").

5. *Total Passings: Provide the number of total serviceable units in the project area. Applicants are encouraged to prioritize areas lacking 25 Megabits per second download and 3 Megabits per second upload speeds, as they will receive priority in application scoring. For projects with more than one service area, each service area must have delineated passing information. Label Attachment: Attachment 4 – Passings Form.*
 - a. *Of the total number of VATI passings, provide the number of residential, business, non-residential, and community anchors in the proposed project area.*

Comcast proposes to extend service to 399 locations that currently do not have access to broadband at speeds of at least 100Mbps/20Mbps. As noted in Attachment 4 – Passings Form, the Project Area includes 382 residential locations and 17 business locations. Please note that Charles City County’s anchor institutions to include the Roxbury Business Park, Charles City County Public Schools, Courthouses, Heritage Public library, government center, Chickahominy Tribal Center are located primarily in Voting Districts One and Two, which were served by a previous VATI grant award.

b. If applicable, of the total number of RDOF passings, provide the number of residential, business, non-residential, and community anchors in the proposed project area.

Not Applicable.

c. If applicable, provide the number of passings that will require special construction costs, defined as a one-time fee above normal service connection fees required to provide broadband access to a premise. Describe the methodology used for these projections.

The Project is designed to achieve functionally universal broadband coverage in the County by extending infrastructure from Comcast’s existing network in the County so that each of the 399 premises **[Redacted]**, meaning there will be no additional charges to connect to the customer’s premises when the home or business owner decides to subscribe to service. This is conditioned on Comcast receiving any necessary right of access where private property construction is required.

d. If applicable, provide the number of passings included in the application that will receive broadband access because special construction costs have been budgeted in the VATI application. Describe the methodology used for determining which passings with special construction costs were budgeted in the application.

As described above, Comcast’s approach to this project is to complete all construction work necessary so that each location will not be subject to special construction costs, and therefore no such costs are included in this proposal.

e. Provide the number of passings in the project area that have 25/3 Mbps or less. Describe the methodology used for these projections. (Up to 15 points)

Comcast and Charles City County analyzed the areas in the County that do not have access to Internet speeds of at least 25/3 Mbps using the FCC's BDC, its own internal database and publicly available data. Based on that review, Comcast and the County estimate 384 of the passings in the Project Area have access to Internet speeds of 25/3 Mbps or less.

6. *Describe if any blocks awarded in Rural Digital Opportunity Fund (RDOF) are included in the VATI application area. If RDOF areas are included in the VATI application, provide a map of these areas and include information on number of passings in RDOF awarded areas within the VATI application area, and Census Block Group ID number for each block group in the project area. Label Attachment: Attachment 5 – RDOF Awarded Areas Form in VATI Area*

There are no RDOF award areas in Charles City County.

7. *For wireless projects only: Please explain the ownership of the proposed wireless infrastructure. Please describe if the private co-applicant will own or lease the radio mast, tower, or other vertical structure onto which the wireless infrastructure will be installed. Also, provide an estimate of the number of simultaneous subscribers that can be served in an area at the chosen speed.*

Not Applicable.

8. *Network Design: Provide a description of the network system design used to deliver broadband service from the network's primary internet point(s) of presence to end users, including the network components that already exist and the ones that would be added by the proposed project. Provide a detailed explanation of how this information was determined with sources. Provide information on how capacity for scalability, or expansion, of how the network can adapt to future needs. If using a technology with shared bandwidth, describe how the equipment will handle capacity during peak intervals. For wireless projects, provide a propagation map for the proposed project area with a clearly defined legend for scale of map. Label Map: Attachment 6 – Propagation Map Wireless Project.*

Comcast's network, the Xfinity 10G Network, includes both hybrid fiber coax ("HFC") and fiber-to-the-home ("FTTH") technologies to deliver data to customers at speeds that meet or exceed the requested speed requirements. Comcast has multiple ways to deliver fast, reliable Internet services. Regardless of the infrastructure selected in the deployment of the network, whether Ethernet passive optical network ("EPON," a FTTH technology) or

HFC, Comcast delivers a consistent, fast, reliable, and secure Internet experience to its customers.

Technology decisions are driven by a number of variables, including type and proximity of the existing network and characteristics of the proposed area. Comcast proposes to construct a fiber to the premises (“FTTP”) network to the vast majority of the Project Area. This network will be capable of gigabit symmetrical speeds upon completion of construction. Specific product offerings will be based on then-current consumer demand and market conditions. Based upon preliminary design work, Comcast is building in a contingency that a limited number of locations in the Project Area would be best served by HFC, taking into account both efficiency and speed of deployment. This portion of the network will be capable of providing 1 Gbps/100 Mbps speeds as a result of enhancements Comcast is making to its network currently.

The next generation, DOCSIS 4.0², will allow Comcast to offer multi-gig symmetrical services starting this year. DOCSIS 4.0 is a technology platform that Comcast is using to digitize and virtualize much of the physical device technology and to move many of those activities into the cloud, allowing Comcast to innovate at the speed of software and to deliver multigigabit upload and download speeds to tens millions of Americans over the connections they already have in their homes.

Comcast began launching the latest phase of its 10G work in 2021. This work involves updating equipment throughout its network, accelerating the digitization and virtualization efforts, and making a mid-split architectural transition that will allow Comcast to increase performance in the near term, while also readying its network for the full 10G upgrade. With the transition to mid-split architecture, which is scheduled to be complete by the end of 2025, Comcast will be able to deliver speeds in excess of 1 Gbps downstream speeds and 100 Mbps upstream speeds. Thus, by the time any new networks are built, Comcast will be delivering on its promise to continue to offer its customers the best broadband experience and will be on the path to delivering service speeds well above 100/100 Mbps.

Comcast has been deploying similar technologies for years as part of this evolution – in the industry it is known as Distributed Access Architecture (DAA) and “virtualized” Cable Modem Termination Systems (vCMTS). By leveraging full duplex and extended spectrum

²Currently, Comcast employs Data Over Cable Service Interface Specification (DOCSIS) 3.1 technology in its broadband network infrastructure. DOCSIS is an international telecommunications standard that permits the addition of high bandwidth data transfer to an existing cable TV system. DOCSIS is a proven, flexible protocol which offers the technological foundation upon which Comcast can meet any current or future anticipated need.

capabilities, Comcast will be able to deliver those multi-gigabit speeds over its existing hybrid fiber coaxial network. In preparation for faster network speeds, earlier this year, Comcast launched its latest Wi-Fi 6E Gateway, one of the first in the world to support multi-gigabit symmetrical Wi-Fi.

Because Comcast is evolving its entire network architecture, equipment, and customer devices, it is uniquely positioned to deliver these advancements in speed, reliability, and performance to everyone it serves, not just a select few. And because much of this work is powered by software, these changes can be made with far less disruption to customers than other technologies. For more information on Comcast's multi-gig network deployment, see <https://corporate.comcast.com/press/releases/comcast-expand-evolve-wifi-largest-multi-gigabit-network>.

For information on Comcast's Network Performance, please see Comcast's Network Performance Report at https://update.comcast.com/wp-content/uploads/sites/33/dlm_uploads/2022/02/0222_2021NetworkReport_V19.pdf

- 9. Speeds: Describe the internet service offerings, including download and upload speeds, to be provided after completion of the proposed project. Detail whether that speed is based on dedicated or shared bandwidth and detail the technology that will be used. This description can be illustrated by a map or schematic diagram, as appropriate. List the private co-applicant's tiered price structure for all speed offerings in the proposed project area, including all speed offerings. Please note, DHCD reserves the right to request verified speed tests distributed throughout a service area at times of peak network usage from a co-applicant's existing network to verify a co-applicant's capability to provide broadband service at speeds at or above 100/20 Mbps. Describe the co-applicant's methodologies for conducting speed tests. (Up to 10 points)*

Comcast will offer customers multiple choices of residential and commercial broadband services, depending on the customers' specific needs. Upon completion of the project, Comcast will be able to provide broadband speeds of at least 1 Gbps download and 100 Mbps upload. The fiber network will be capable of gigabit symmetrical speeds. Specific product offerings will be based on then-current consumer demand and market conditions.

Included for reference and informational purposes only, the tables below (Xfinity Residential Service Tiers and Comcast Business Tiers) reflect service tiers, speeds, and pricing generally available for Comcast's current hybrid fiber coaxial ("HFC") network offered in Virginia, including more densely populated areas. Comcast is currently pricing

the services for the Project's EPON network and expects pricing to be consistent across all future networks in the County.

Xfinity Residential Service Tiers (currently offered in the County)

Tier	Speeds Up To (Download / Upload)	Standalone Pricing
Connect	75 Mbps / 10 Mbps	\$65.00 monthly
Connect More	200 Mbps / 10 Mbps	\$87.00 monthly
Fast	400 Mbps / 10 Mbps	\$102.00 monthly
Superfast	800 Mbps / 20 Mbps	\$107.00 monthly
Gigabit	1 Gbps / 20 Mbps	\$112.00 monthly
Gigabit Extra	1.2 Gbps / 35 Mbps	\$117.00 monthly
Gigabit x2	2 Gbps / 100Mbps	\$130.00 monthly

**Gigabit x2 is only available in network enhanced areas with xFi Complete*

As noted above, Comcast is currently pricing the services for the all-fiber EPON network being proposed in response to this RFP. Comcast recently began launching all fiber service in neighboring states and expects the pricing to be consistent across future EPON networks in Virginia. The chart below is provided to be illustrative of the speed tiers and pricing of Comcast’s gigabit symmetrical service.

Xfinity Residential Service Tiers (EPON Markets)

Tier	Speeds Up To (Download / Upload)	Standalone Pricing
Connect	75 Mbps / 75 Mbps	\$65.00 monthly
Connect More	200 Mbps / 200 Mbps	\$87.00 monthly
Fast	400 Mbps / 400 Mbps	\$102.00 monthly
Superfast	800 Mbps / 800 Mbps	\$107.00 monthly
Gigabit	1 Gbps / 1 Gbps	\$112.00 monthly

Comcast is committed to ensuring its network is reliable and customers are receiving service speeds to which they subscribed. Comcast network engineers and technicians work diligently to proactively monitor network performance and have systems in place that measure speed and latency to end users.

Comcast’s Xfinity Internet Measurement Platform is a cutting-edge system with an independently validated methodology³ that automatically measures the quality of end

³ See “Design Audit Report of Comcast’s Network Performance Measurement System” from NetForecast, April 2020, at <https://www.netforecast.com/wp-content/uploads/Comcast-Design-Audit-Report-NFR5133F.pdf>.

user connections. This includes both speed and latency measurements. The system runs over 700,000 tests per day across all regions and times of day – and it can provide reporting on performance in specific areas. Tests are run from millions of Comcast cable modem gateways to servers in regional datacenters – where network interconnection to Content Delivery Networks and other networks often occurs - providing an accurate picture of ISP access network performance. Moreover, tests run continuously throughout the day, capturing both peak & off-peak performance and measure downstream speed, upstream speed, idle latency, and working latency. The tests do NOT evaluate the performance of the local Wi-Fi network because that is not indicative of network performance – tests are appropriately focused on the service provided to the end user’s home. In some limited cases, a comparable independent measurement system may be used instead of this system or as a validation check on the system.

10. Explain how the proposed project achieves universal broadband coverage for the locality or fits into a larger plan to achieve universal broadband coverage for the locality. If applicable, explain the remaining areas of need in the locality and a brief description of the plan to achieve universal broadband coverage. (Up to 50 points)

The proposed Project, together with the County’s second application, will achieve near ubiquitous coverage in the County. It would expand Comcast’s existing service area to include locations which do not currently have access to service based on County data, the FCC’s BDC map, and Comcast’s internal data analysis.

Project Readiness

11. Describe the current state of project development, including but not limited to planning, preliminary engineering, identifying easements/permits, status of MOU or MOA, and final design. Prepare a detailed project timeline or construction schedule, identifying specific tasks, staff, contractor(s) responsible, collection of data, etc., and estimated start and completion dates. Applicants are encouraged to extensively discuss, where applicable, easements relating to railroad crossings, federally owned lands and parks, partnerships with the Virginia Department of Transportation, and mobile home parks. Applicants must include Memorandums of Understanding (MOUs) or Memorandums of Agreement (MOAs) between applicants (drafts are allowable). Label Attachments: Attachment 7 – Timeline/Project Management Plan; Attachment 8 – MOU/MOA between Applicant/Co-Applicant; (up to 10 points)

Comcast has completed the planning and preliminary engineering phase for the proposed Project. Final engineering, design and construction will commence upon the award of the

grant. The initial tasks include project engineering and right of way preparation. This Project includes a combination of underground and aerial construction. Given that Comcast already has facilities near the Project Area, which it can leverage in this Project, Comcast will be able to implement the Project quickly, upon receiving the final permits.

Throughout the duration of the Project a dedicated Comcast team member will be in contact providing status and answering any questions the community may have, and the County will communicate progress and issue press releases and other forms of community outreach including social media.

Comcast anticipates completing the project within 18 months after contract execution between the County and DHCD. As contemplated by the 2024 VATI guidelines, Comcast may request an extension if it encounters permitting, pole attachment, or other circumstances beyond its control which may delay the project timeline. Comcast will activate service as areas are completed so many residents and businesses will be able to access service earlier than the end of the project.

Comcast will leverage existing pole attachment agreements with all the pole owning utilities in the Project Area. Having deployed thousands of miles of plant in Virginia, Comcast has extensive experience working with pole owners and their processes in order to obtain the required permits to attach to poles. Other permitting and supply chain delays not reasonably anticipated by Comcast may also pose a risk to timely completion, however, Comcast's extensive network of engineers, technicians, vendors, and partners provides an edge in ensuring a timely delivery of projects. The scale of Comcast's business also allows it to lock in competitive pricing on materials and equipment and effectively manage large projects.

See Attachment 7 for Timeline and Project Management Plan and Attachment 8 for the MOU/MOA between Applicant/Co-Applicant (Draft).

12. Has the applicant or co-applicant received any VATI grants? If so, provide a list of these grants, with a detailed summary of the status of each.

Between 2017 and 2021, DHCD awarded Comcast five (5) VATI grants. Comcast has successfully met or exceeded the requirements of each of those awards, having constructed the projects on time and within the proposed budget. Comcast has deployed broadband, with speeds up to 1.2 Gbps and with services options designed for low-income households, to over 3,500 locations throughout the project footprints. Comcast was awarded a sixth VATI grant in 2022 in Stafford County and is nearly complete with that project as well.

Charles City County in partnership with Comcast was awarded a VATI grant in 2020 that covered 2/3 of the county with broadband infrastructure, primarily in Districts One and Two. The project was recently closed out successfully after the parties satisfied multi year reporting requirements.

13. Matching funds: Complete the funding sources table indicating the cash match and in-kind resources from the applicant, co-applicant, and any other partners investing in the proposed project (VATI funding cannot exceed 80 percent of total project cost). In-kind resources include, but are not limited to grant management, acquisition of rights of way or easements, waiving permit fees, force account labor, etc. Please note that a minimum 20% match is required to be eligible for VATI, the private sector provider must provide 10% of the required match. If the private co-applicant cash match is below 10% of total project cost, applicants must provide financial details demonstrating appropriate private investment. If applicants and co-applicants are seeking to include prior expended funds as matching funds, Attachment 11 must be completed. Label Attachments: Attachment 9 - Funding Sources Table; Attachment 10 –Documentation of Match Funding; Attachment 11 – Prior Expended Match Form

The proposed Project represents a partnership between Comcast and the County. Comcast, the co-applicant, upon award of the VATI grant, will be responsible for \$1,476,053 in matching funds and will provide the labor and materials to complete the provision of services to the Project Area delineated in Attachment 16 – Point and Polygon Shapefiles.

As noted above, Comcast is also working with the County to negotiate an agreement under which the County would receive \$2,643,508 in grant funding under RUS Reconnect for Congressionally Directed Spending projects. If VATI funding is awarded to the project, and contingent upon negotiation of a grant agreement on mutually agreeable terms, the County will contribute additional matching funds to the project lessening the amount requested from DHCD under VATI.

Comcast will provide approximately 20% of the projected construction costs of \$7,380,264 totaling approximately \$1,476,053. The County will assist by providing in-kind contributions including application analysis and preparation, coordination with DHCD, assistance with right of way permitting, and participating in further concert with Comcast as the Project is approved and construction begins. The estimated in-kind contribution by Charles City County is greater than \$100,000.00 and is valued based on salary and

benefits of key leadership team members to include County Administrator, Assistant County Administrator and Finance Director.

A breakdown of costs is attached below. Please see Attachment 9 – Funding Sources Table and Attachment 12 - Derivation of Cost for additional details.

Locations: 399

Mileage: 77

Homes per Mile: 5.2

Total Cost: \$7,380,264

Comcast Match: \$1,476,053

RUS Funding: \$2,643,508*

VATI Gap Funding: \$3,260,703

*Pending final negotiation of an agreement under which the County and Comcast agree to the terms and conditions of the RUS grant program.

14. Leverage: Describe any leverage being provided by the applicant, co-applicant, and partner(s) in support of the proposed project. (Up to 10 points)

In addition to the leverage funds of \$4.1 million from other sources (Comcast and RUS) the County will provide support for the project by assisting with permitting and grant administration. Key leadership team members include the County Administrator, Finance Director and Community Development Director/Assistant County Administrator. These parties are estimated to devote 1/3 of their time for project and grant management over an estimated 24-months, pre and post contract execution and project implementation, at an estimated costs of \$228,667.00 to include salary and fringe benefits. The County proposes to provide extensive support to the project/grant without charging administrative costs to the project. The County will also assist with local marketing of the availability of service to residential and business customers.

When Comcast constructs service to a new area, we design the project to make every location drop serviceable so that all locations in the project are considered standard installations. Comcast absorbs the costs of installing a drop when we install a customer, which averages \$500 per location, or \$199,500 if every resident in the Project Area subscribed to service.

Once the Project is complete, Comcast can leverage teams in other regions to support the County in time of emergency and can open its WiFi network to support emergency

response. Comcast's financial stability and geo-distributed cybersecurity operations center will provide peace of mind and reliable service to the County.

As noted throughout this response, Comcast continually invests in its network to ensure it can offer innovative products that meet the needs of residents and businesses in the County. Comcast is also a member of CableLabs, a premier innovation lab for future-forward research and development that facilitates cutting-edge solutions that incorporate university research, vendors, telecommunications companies and other industries. The partnership with CableLabs and others in the telecommunications industry supports the development of many technological advancements that keep Comcast on the cutting-edge and prepared for the digital future.

In-Kind/ Free Service Installations - Comcast's standard installation fee of \$100.00 is waived for all residents and businesses who subscribe to service as a result of this project. For Sector 3 the in-kind value of installing service at 399 homes is \$39,900.

15. Communications Plan: Describe efforts to keep the public informed of project progress and the broadband adoption plan.

- a. Explain how you plan on communicating the project status to stakeholders, including but not limited to County leadership, project areas residents, etc. (Up to 10 points)*

Comcast will keep the public informed of Project progress and drive broadband adoption through a variety of means including mailing information to residents, local media, and outreach to the community. Also, Comcast will drive adoption of the affordable subscriber options, Internet Essentials and Internet Essentials Plus, to all eligible residents. Interested residents will be able to sign up for service by calling Comcast's toll-free telephone number, using Comcast's website or in person at the nearest Xfinity store. Comcast employs a sales and marketing team of professionals to support these efforts and call center team members are skilled in addressing questions regarding Comcast's products and services. If conditions allow, a public meeting or event can be held in conjunction with the County in or near the Project Area to inform the residents about the upcoming work and answer questions.

Comcast will continue to meet regularly with the County to discuss Project status and will provide written progress update reports throughout the duration of the Project. Comcast is available at any time to address any questions or concerns that may arise during the Project.

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- b. 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. (Up to 10 points)*

Forecasting a take rate with a high degree of accuracy is most challenging as the actual number of customers who choose to subscribe is beyond the parties' control. Comcast's take rate estimate for the Project Area is based upon several unique factors. The County's support for the Project and involvement with the community is expected to add heightened awareness earlier than might otherwise occur. The public nature of the VATI program is also expected to add to the early awareness of residents of broadband availability and positively enhance the take rate.

In Comcast's experience, take rates are relatively higher in areas that have not had access to broadband service in the past. Comcast anticipates no different outcome with this Project. Nonetheless, as Comcast bears all operational risk once the Project construction is complete and the proposed Project Area represents less than 1% of Comcast's current Virginia locations served, there is no risk to the Commonwealth, or County, of lower-than-average take rates.

Comparisons between applicants may not provide a useful measure of broadband access as each applicant will have different service offerings, marketing campaigns, and other intangibles that could drive take rates. For example, Comcast take rates may vary from those of other providers because Comcast offers more services than broadband alone – including video, telephone, mobile telephone, and home security outlined in Attachment 21 – and offers bundled pricing promotions from time to time. These additional products and pricing options can change the value proposition of Comcast service for each household and business that is unique among providers.

- c. Describe any digital literacy efforts to ensure residents and businesses in the proposed project area sufficiently utilize broadband. Please list any partnering organizations for digital literacy, such as the local library or cooperative extension office.*

Comcast is committed to serving all residences and businesses within the Project Area on a non-discriminatory basis with a variety of service options for affordable home Internet for qualifying households. Under Comcast's Internet Essentials offering – the most comprehensive and successful low-income broadband adoption program in the nation – qualifying households can obtain broadband service at speeds of up to 50Mbps/10Mbps for \$9.95/month (plus applicable taxes, fees, and surcharges), or speeds of up to

100Mbps/20Mbps for \$29.95/month (plus applicable taxes, fees, and surcharges), as well as free digital skills training in person and online. Customers have the option to purchase a low-cost Internet-ready computer.

Comcast has continued a commitment it made in 2011 to keep its Internet Essentials price at \$9.95/month (plus applicable taxes, fees, and surcharges). In 2022, Comcast introduced a new tier of Internet Essentials called Internet Essentials Plus for \$29.95/month (plus applicable taxes, fees, and surcharges), that delivers speeds up to 100/20Mbps. Current Internet Essentials customers can upgrade to this plan, and new qualifying customers can subscribe directly to this tier.

Since launching in 2011, Comcast has made dozens of improvements to the Internet Essentials program, including expanding eligibility 12 times—bringing Internet Essentials to new audiences such as public housing residents, low-income veterans, seniors, and even community college students. Comcast has a history of increasing speeds and enhancing its Internet Essentials program and anticipates continuing to do so in the future.

Illustrating this impact, in a 2021 Comcast survey, 76% of participants in Comcast's Internet Essentials broadband adoption program said their service has helped someone in their household find a job, and 78% of households with lost wages due to COVID-19 believe Internet Essentials has helped reduce that loss. 79% said the service has helped them find health and/or medical information. Significantly, 90% reported a positive impact on their child's grades.

In 2020, Comcast established its award-winning “Lift Zones” initiative to complement the Internet Essentials program. Working with its network of thousands of non-profit partners and city leaders, Comcast launched more than 1,250 Lift Zones by the end of 2022. Lift Zones—including a location at the Chickahominy Indian Tribe in Charles City County-- provide free, robust WiFi in community centers to support students who, for a variety of reasons (including homelessness or housing insecurity), are simply unable to participate in distance learning at home. Lift Zones also serve diverse adult populations, as they enable access to hundreds of hours of free digital skills training for remote work, telehealth services, and more.

Comcast has a long history of partnering with and supporting the communities it serves. Recently, Comcast has been focused on creating a world of unlimited possibilities through Project UP, championing Diversity, Equity & Inclusion, and protecting the environment. A few key accomplishments include:

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- Reaching our most inclusive employee representation in the ten years since we have been tracking diversity data:
 - Our overall workforce is 36% women and 45% people of color as of the end of 2021.
 - 47% of our new hires last year were women and 57% were people of color.
 - Reducing our Scope 1 and 2 greenhouse gas emissions by 19% from 2020 to 2021, marking progress toward our carbon neutral goal.

For more information, please see the 2023 Impact Report (<https://corporate.comcast.com/impact/report/2023>) and the 2022 Internet Essentials Progress Report (<https://corporate.comcast.com/stories/2022-internet-essentials-progress-report>)

16. Project Management: Identify key individuals who will be responsible for the management of the project and provide a brief description of their role and responsibilities for the project. Present this information in table format. Provide a brief description of the applicant and co-applicant's history and experience with managing grants and constructing broadband communication facilities. Project Budget and Cost Appropriateness (135 points)

Charles City County's leadership and executive administrative team consists of team members with collective grant management experience of more than fifty years. The team consists of Ms. Michelle Johnson, County Administrator, Mrs. Abby Pemberton, Finance Director, and Ms. Rhonda L. Russell, Community Development Director/Assistant County Administrator. Additionally, the project will be supported by Comcast, the county's VATI grant partner. Ms. Johnson will serve as the Chief Administrative Officer responsible for signing and monitoring the DHCD contract and providing direct oversight and management of the overall project. Ms. Johnson is the County Administrator for Charles City County. Ms. Johnson is a graduate of Virginia State University, where she earned a Bachelor of Science degree in accounting. She is also a graduate of Leadership Metro Richmond, class of 2016. Ms. Johnson worked in corporate America and state government for several years after graduating and began her public service career in Charles City County in 2003. Ms. Johnson has managed budgets of more than \$25 million, and as many as 100 employees. Dr. Russell will serve as the Grant Administrator. She is primarily responsible for aiding in the areas of overall grant administration including record keeping, preparation of required reports to the VDHCD in conformance with grant requirements, and coordinating management team meetings. Dr. Russell has extensive public service and management experience amassed over a twenty-year local government career where she has managed as many as thirteen employees, departmental budgets of more than \$500,000.00, written,

received, and implemented multiple grant awards for housing rehabilitation, broadband, and sewer infrastructure and lead abatement projects, totaling more than \$50 million. Additionally, Dr. Russell's noteworthy academic preparation includes an undergraduate Planning Degree, from Va. Tech, Blacksburg, Virginia, a Master of Public Administration degree, from Old Dominion University, Norfolk, Virginia, and a terminal degree in Organizational Leadership with a concentration in Human Services Administration, Nova Southeastern University, Fort Lauderdale, Florida. Mrs. Christina Jones will serve as the project's Financial Manager. In this capacity, she will oversee the overall implementation of the project including signing and approving any financial reports and documents related to the project including requests for contract extensions, budget revisions, annual reports, draw-down forms, and close-out forms. Mrs. Jones is an alumnus of Virginia State University and holds a degree in business management. Mrs. Jones has extensive experience in both the private and public sectors.

Comcast's operations in the Commonwealth are managed through Comcast's Beltway Region, with regional headquarters located at 1215 E Fort Ave., Ste #103, Baltimore, MD.

Comcast's team of project managers, engineers, and technicians have the necessary technical, front-line support and established back-office expertise to successfully complete this proposed Project and provide continued 24/7 network support. The following CVs provide examples of the experienced personnel Comcast has available to complete the Project.

Beltway Region Leadership

Key Individual	Title	Responsibilities
Ray Roundtree	Regional Senior Vice President	Mr. Roundtree is responsible for the organization's operational, strategic, and financial performance across Maryland, Virginia, Washington DC, and parts of Delaware, North Carolina and West Virginia.
Dee Ademeyo	Vice President of Finance	Ms. Ademeyo leads all financial and accounting functions while helping to drive a great customer and employee experience. Prior to this position, Ms. Ademeyo was the Vice President of Accounting Operations for Comcast Business and previously served as the Controller for Spectrum Arena and the Regional Finance Manager for Global Spectrum.

Misty Allen	Vice President of Government and Community Affairs	Ms. Allen leads the government, regulatory and community affairs teams in the Beltway Region. Prior to joining Comcast, Ms. Allen led state and local government affairs strategies at Baltimore Gas and Electric (BGE) as the Director of Government and Legislative Affairs.
Dan Carr	Vice President of Comcast Business	Mr. Carr has regional responsibility for all sales, sales support, revenue, operating profit and loss and customer satisfaction for Comcast Business products and services. Before joining the Beltway Region, Mr. Carr had national responsibility for sales operations and support for Comcast Business, supporting the development of a high-performing field sales organization and the critical functions necessary to ensure productivity across all sales channels.
Robert Jones	Vice President of Technical Operations	Mr. Jones leads the day-to-day operations for the Installation & Service team and works with Headquarters and Northeast Division Technical Operations leaders to implement strategies focused on delivering the best customer and employee experiences.
Alex Hodjatzadeh	Vice President of Engineering Operations	Mr. Hodjatzadeh manages all network maintenance and construction teams who expand and maintain the Beltway Region's vast networks and also implement new technology-based products and services. Mr. Hodjatzadeh joined Comcast in 2019 as the Senior Director of Finance for Technical Operations and Capital, and most recently served as Senior Director of Construction.

Project Management

Name	Title	Role	Responsibility
Kristen Ritchey		Proposal Point of Contact	Ms. Ritchey leads rural broadband expansion efforts for Comcast and will be responsible for making sure the project meets state requirements and coordinate reporting and compliance activities.

Kevin Broadhurst	VP, Government Affairs	Government Affairs Representative	Mr. Broadhurst will be the primary contact for the County and the Commonwealth and make sure any questions or concerns are addressed.
Tony Voros	Director, Construction	Construction Supervision	Mr. Voros will oversee all construction activities related to the project and ensure they are completed according to VATI program guidelines.
Edward Rowan	Senior Director, Business Development	Project Identification	Mr. Rowan leads Comcast's network expansion efforts and was responsible for identifying the unserved and underserved locations included in the Project. He will provide support for construction and compliance.

Comcast has significant experience constructing broadband communications facilities, including partnerships with public agencies to deploy broadband infrastructure in unserved areas. It is a leading communications provider in Virginia, offering video, high-speed Internet, home security, and phone services to residential customers under the Xfinity brand and also providing services to businesses through its Comcast Business suite of products. Comcast has invested in technology to build an advanced network that delivers among the fastest broadband speeds, and brings customers personalized video, communications, and home management offerings. Comcast has invested billions of dollars to create a network across the U.S. that makes broadband widely available, as part of its commitment to provide superior services to its customers.

As noted above, Comcast was awarded six (6) VATI grants in 2018, 2019, 2020 and 2022. Comcast has successfully met or exceeded the requirements of 5 awards, having constructed the projects on time and within the proposed budget, and is currently completing the sixth project in Stafford County. Comcast has deployed broadband, with speeds up to 1.2 Gbps and with services options designed for low-income households, to over 3,500 locations throughout the project footprints. In 2018 Comcast also earned a Last Mile Broadband grant from the Virginia Tobacco Region Revitalization Commission to provide broadband access to nearly 7,000 homes and businesses. Construction was completed in 2020 and ahead of schedule. Comcast provided access to 1,000 more homes and addresses than originally estimated.

During this period, Comcast has partnered with other states and counties on broadband expansion projects funded in part by the American Rescue Plan Act (“ARPA”) and Capital

Projects Fund (“CPF”). Comcast’s successful completion of these construction projects, including meeting all Treasury compliance requirements, has resulted in years-long partnerships with states including Maryland, Pennsylvania, Delaware, West Virginia and Massachusetts

Comcast was awarded several grants under the various broadband expansion programs administered by the Maryland Department of Housing and Community Development’s Office of Statewide Broadband, the Delaware Broadband Initiative, and the Massachusetts Technology Collaborative (“Mass Tech”). Comcast completed the projects on time, on budget, and in many cases was able to reach more homes than originally anticipated.

Comcast is currently expanding service to unserved and underserved areas through participation in the following programs: West Virginia Line Extension and Development (“LEAD”) and Major Broadband Funding Strategies (“MBPS”) Programs and the Commonwealth of Pennsylvania Unserved High-Speed Broadband (“UHSB”) Program. In addition, Comcast is working with Washington and Dauphin Counties in Pennsylvania, and multiple other local jurisdictions to extend service to thousands of unserved and underserved locations.

17. Budget: Applicants must provide a detailed budget that outlines how the grant funds will be utilized, including an itemization of equipment, construction costs, and a justification of proposed expenses. If designating more than one service area in a single application, each service area must have delineated budget information. For wireless projects, please include delineated budget information by each tower. Expenses should be substantiated by clear cost estimates. Include copies of vendor quotes or documented cost estimates supporting the proposed budget. Label Attachments: Attachment 12 – Derivation of Costs; Attachment 13 - Documentation of Supporting Cost Estimates. (Up to 10 points)

Comcast estimates that this Project will cost \$7,380,264. Comcast’s construction estimates are determined through a detailed project analysis that includes a desktop survey, an analysis of permitting costs, a network impact study to determine necessary hub site preparation and possible infrastructure requirements, and a financial evaluation for overall build costs and likely return-on-investment. When contract labor is utilized, costs are accrued according to the fee schedule in the contract. The design and construction process is standard within the telecommunications industry.

It is appropriate to use public funds for this proposed Project because private, at-risk capital is not likely to be invested by service providers in this area due to low population density.

Comcast is seeking support in the amount of \$5,904,211 from the VATI program to expand broadband service to unserved homes and businesses in the Project Area. Comcast, upon award of the grant, will be responsible for \$1,476,053 or 20% matching funds and will provide the labor and materials to complete the provision of services to the Project Area described in this response. As noted in Section 14 (Matching Funds), VATI Funding may be reduced using County matching funds appropriated through RUS Reconnect for Congressionally Directed Spending, pending negotiation of a grant agreement on mutually agreeable terms.

Project Costs Breakdown

Project Phase	Cost
New Equipment/Materials	\$ [Redacted]
New Construction	\$ [Redacted]
Engineering/Design	\$ [Redacted]
Permits/Make-Ready	\$ [Redacted]
Surveys	\$ [Redacted]
Total	\$ 7,380,264

Comcast's expenses fall into five (5) categories: New Equipment/Materials, New Construction, Permits, Engineering and Surveys.

New Equipment/Materials includes mainly "outside plant equipment" such as nodes and optical equipment, power supplies, fiber cable, coaxial cable, conduit, vaults, pedestals and strand. This category also includes "inside plant equipment" such as ethernet switches.

New Construction expenses cover the cost of installing the plant including make-ready construction. For underground construction, this involves directional boring; installing pedestals, vaults, and conduits; pulling in cable; demolition and build-back and debris removal. Aerial construction includes placing strand, lashing cables, placing anchors, and placing poles. This category also includes fiber and coaxial splicing and testing the new network.

Engineering/Design covers design of the network, including the completion of permit-ready detailed drawings based on walk-out surveys.

The Permits/Make-Ready category includes the cost of submitting make-ready applications to pole owners and fees for any other permits required by the project.

Survey expenses include the cost of performing a walkout survey, completing pole profiles, make ready assessment, and geotechnical surveys for underground work.

18. The cost benefit index comprises state cost per unit passed. Individual cost benefit scores are calculated and averaged together to create a point scale for a composite score. Provide the following: (up to 125 points)

- a. *Total VATI funding request – \$3,260,703*
- b. *Number of serviceable units – 399*

Upon completion of the Project, Comcast would handle all network upgrades, maintenance and repair to ensure fast, reliable, and scalable broadband service to residents and businesses and not seek additional public funding for the Project area. In addition, Comcast would reinforce DHCD's economic development work by encouraging broadband adoption through outreach activities as described in section 20(f) below.

Commonwealth Priorities

19. Additional points will be awarded to proposed projects that reflect Commonwealth priorities. If applicable, describe the following:

- a. *Businesses, community anchors, or other passings in the proposed project area that will have a significant impact on the locality or region because of access to broadband.*

Comcast and the County's proposed Project will provide a broadband network capable of delivering speeds that reliably meet or exceed 100 Mbps download and at least 20 Mbps upload speeds and be scalable to a minimum of 100 Mbps symmetrical for download and upload speeds based on future technology advances to 382 residential customers and 17 businesses.

The Project will greatly improve the County's economic vitality by supporting business growth and job creation by providing access to broadband service in unserved areas of the County. The Project provides the infrastructure needed to improve residents' quality of life by enabling residents to bridge the local skills gap, expand their career pathways,

access and engage in telehealth opportunities, pursue education, and more. Upon completion of this project, residents and businesses would have access to some of the fastest and most reliable broadband speeds available nationwide.

b. Unique partnerships involved in the proposed project. Examples include electric utilities, universities, and federal/state agencies

As noted throughout this response, Comcast has significant experience in partnering with local government in broadband deployment projects. As a leading broadband provider in the Commonwealth and the country, Comcast understands what is necessary to deploy broadband infrastructure in locations with varied geography and population densities. Comcast has successfully engaged in public-private partnerships and understands the importance of them in expanding the network to serve otherwise uneconomical areas in many localities, including the County.

c. Digital equity efforts to ensure low to moderate income households in the proposed project area will have affordable access to speeds at or above 100/20 Mbps, include information regarding the internet service provider's participation in the Affordable Connectivity Program.

As of August 14, 2023, ACP has helped to connect more than 20 million households to broadband access. At a May 2022 White House event, Comcast was recognized for stepping up with innovative offerings like Internet Essentials Plus to help eligible households take full advantage of the ACP credit. (<https://www.meritalk.com/articles/white-house-lines-up-broadband-providers-websites-for-acp/>).

Under ACP, qualifying households may receive a credit of up to \$30/month (\$75/month in Tribal lands) toward any Xfinity Internet service tier, including Internet Essentials and Internet Essentials Plus, and/or Xfinity Mobile service. If customers have both Xfinity Internet and Xfinity Mobile, the ACP credit will first be applied toward Internet and any remaining credit will be automatically applied to their Xfinity Mobile data usage and/or services fees.

Internet Essentials and Internet Essentials Plus are each fully covered by the ACP credit. In addition, an Internet Essentials customer (paying \$9.95/month) who is enrolled in ACP can have the remaining ACP credit applied to their Xfinity Mobile service. For example, an Internet Essentials participant (paying \$9.95/month) who adds one line of Unlimited on Xfinity Mobile (\$45/month) will only pay \$24.95/month after applying the remainder of the ACP credit. For more information, see

[https://corporate.comcast.com/press/releases/comcast-affordable-connectivity-program-internet-essentials-service-xfinity-mobile.](https://corporate.comcast.com/press/releases/comcast-affordable-connectivity-program-internet-essentials-service-xfinity-mobile)

- d. The co-applicant's efforts to mitigate supply chain constraints, including labor shortages and order-to-delivery delays on telecommunications materials required to construct broadband networks.*

The scale of Comcast's business allows Comcast to work with suppliers in obtaining equipment and materials, to lock in competitive pricing on materials and equipment, and effectively manage large projects. In a time characterized by logistical constraints and supply chain delays, Comcast's extensive network of engineers, technicians, vendors, and partners provides an edge in ensuring a timely delivery of projects.

- e. The co-applicant's efforts to mitigate costs and delays that may be associated with make-ready and other permitting requirements anticipated for network deployment.*

Comcast has pole attachment agreements with the pole owners in the Project Area and is well versed in applying for permits under those agreements. Having deployed thousands of miles of plant in Virginia, Comcast, has extensive experience working with pole owners and their processes in order to obtain the required permits to attach to poles. Other permitting delays not reasonably anticipated by Comcast may also pose a risk to timely completion, however, the experience of Comcast's employees and partners will help mitigate any issues that arises. Also, Comcast has authorization to work in the public right of ways under its franchise agreement with the County and will work with the County to obtain the necessary permits. The proposed Project involves a combination of underground and aerial construction.

- f. The applicant's and co-applicant's efforts to promote broadband adoption, including, but not limited to telehealth, smart farming, e-entrepreneurship, and distance learning.*

If selected, Comcast will drive broadband adoption for all consumers through a variety of means including mailing information to residents, local media, and outreach to the community. Comcast will also drive adoption of its affordable subscriber options, Internet Essentials and Internet Essentials Plus, to all eligible residents. Interested residents will be able to sign up for service by calling Comcast's toll-free telephone number, using Comcast's website, or in person at the nearest Xfinity store. Comcast employs a sales and marketing team of professionals to support these efforts and call center team members are skilled in addressing questions regarding Comcast's products and services.

If conditions allow, a public meeting or event can be held in conjunction with the County in or near the proposed Project Area to inform the residents about the upcoming work and answer questions. Comcast will partner with local leaders, community organizations, and non-profit groups to further maximize the broadband adoption rate in the Project Area.

The new infrastructure, combined with broadband adoption efforts, would improve quality of life in the County by enabling residents to bridge the local skills gap, expand their career pathways, access and engage in telehealth opportunities, pursue education, and more. Today, many employment opportunities are disseminated via online sources. Access to broadband will enable residents to easily search for and apply to open job listings, communicate with potential employers, and work from home. Broadband access will also enable residents to take greater control over their health care, enabling remote access to important health-related resources and technology, as well as direct communication with health care providers.

Furthermore, broadband access enables residents to pursue education programs from their own homes. Online courses can be taken by homeschooled children, college students, entrepreneurs, freelancers, officegoers, and retirees. Certain higher education institutions provide online programs allowing students to obtain a degree remotely, as an alternative to the traditional on-campus higher education experience. Without high-speed Internet and increased broadband capacity, residents lack the connectivity they need to pursue a modern education and compete in today's world.

Comcast promotes the development of digital skills in communities by investing in hyper-local organizations and special projects that build digital literacy skills for today's workforce economy. This work includes increasing basic digital and tech skills; advancing skills in online banking, telehealth, online safety, career development and STEAM; accelerating broadband adoption; expanding workforce training/certifications for adults; strengthening and forging partnerships to meet local business and community needs, and supporting Digital Navigator programs. Comcast recently awarded \$25,000, provided 100 laptops and installed a Lift Zone to support the Chickahominy Indian Tribe and its citizens with digital literacy and skills training. Comcast is currently providing support to the Chickahominy Indian Tribe as they identify a consultant to develop a plan to extend broadband service to additional members.

Additional Information

20. Provide any other information that the applicant desires to include. Applicants are limited to four additional attachments.

Charles City County and Comcast partnered to submit applications for VATI funding in FY2022 and FY2023. An evaluation of the application score sheets noted subpar scores in coordination with the Chickahominy Tribe, high costs per serviceable unit and the exclusion of community service facilities as serviceable units. Our VATI 2025 application addresses these noted deficiencies as follows:

Coordination with the Chickahominy Tribe - Charles City County enjoys a transparent and seamless relationship with Chickahominy Tribe leadership. Included in this application is a letter of support from the Chickahominy Tribe. Both the County and Comcast are supporting the Chickahominy's efforts in the areas of digital literacy and expansion of broadband infrastructure for tribal members.

Cost of Serviceable Units - The high unit costs for broadband infrastructure in District Three are due significantly to the low density of development in this area. The VATI 2025 application reduces the per unit costs to service each residence by expanding match dollars for the grant with both private and grant dollars. The applicant desires to expend the Reconnect grant funds awarded to Charles City County for District Three Broadband implementation, \$2,643,508.00 in conjunction with a VATI award. These funds have not been tasked to a project for implementation. A VATI award will limit will allow the County to complete expansion to unserved locations using the Reconnect funds before overall projects implementation costs increase due to steadily increasing rates for material and labor.

Exclusion of Community Service Facilities - Charles City County and Comcast partnered in FY20 to submit a VATI application that was subsequently awarded. The VATI FY20 grant funds provided broadband infrastructure for more than 2/3 of the County, primarily in Districts 1 and 2. All of the County's community service facilities including public schools, recreation facilities, government buildings, libraries, and many churches are in Districts 1 and 2. These facilities were serviced in the VATI FY20 funded grant. A limited number of facilities proposed for connection using VATI 2025 funds include a fire station, and a few churches.