BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Proceeding to Consider Rules to Implement the Broadband Equity, Access, and Deployment Program	Rulemaking 23-02-016

APPLICATION FOR REHEARING OF RESOLUTION T-17920 BY FURTHER REACH INC.

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I. INTRODUCTION

Pursuant to Public Utilities Code Section 1731(b) and Rule 16.1 of the Commission's Rules of Practice and Procedure, Further Reach Inc. ("Further Reach") respectfully submits this Application for Rehearing of Resolution T-17920, adopted September 17, 2026 and issued September 18, 2026. This application is filed within 30 days of issuance and is timely under Section 1731(b)(1).

In Resolution T-17920, the Commission removed 2,381 locations from BEAD eligibility under reason code 5 as already served by Further Reach. It left in Appendix B3 another 1,585 locations that the same FCC data show served by the same provider, with the same technology codes, at 100/20 Mbps or better. No finding in the resolution explains the difference. The criteria Appendix F states, whether removal "could translate into reduced awards" and whether a location was among the "high-cost locations" subgrantees were asked to remove (Appendix F, p. 4), concern cost. Cost is not a condition of reason code 5.

Treating locations the same FCC data show served the same way differently, with no stated reason, is an abuse of discretion. A decision that leaves that difference unexplained is not supported by its findings. The reasons the resolution gives, that Staff lacked discretion beyond NTIA's curing requests and that NTIA approved Appendix B3, do not distinguish the locations removed from those kept. Each is a legal error under Public Utilities Code Section 1757.1(a).

II. GROUNDS FOR REHEARING

As Section 1732 requires, Further Reach states the following grounds specifically.

1. **Abuse of discretion (Section 1757.1(a)(1)).** The Commission applied its reason-code-5 standard to 2,381 Further Reach locations and refused to apply the same standard to 1,585 locations that meet it on the same FCC data.

2. **Decision not supported by the findings (Section 1757.1(a)(4)).** The resolution contains no finding that distinguishes the 1,585 locations from the 2,381. Findings 7 and 10 state only that the projects comply with NTIA's rules and that the revised Final Proposal is reasonable; neither addresses whether the 1,585 are already served.

3. **Failure to proceed in the manner required by law (Section 1757.1(a)(2)).** The resolution retained Further Reach locations on the ground that Staff lacked discretion beyond NTIA's curing requests. The Commission is not bound by the limits of Staff's delegation. NTIA's May 28, 2026 cost request named no project or location, and of its June 23 list NTIA wrote that "California is encouraged to consider these locations." (Appendix F, p. 2; Appendix E, Round 7, p. 64.) The cost conditions stated in Appendix F are not conditions of reason code 5, which the Guidance makes available "[o]nly for locations with qualifying broadband service in the current National Broadband Map." (Final Proposal Guidance v2.1, p. 51.)

Further Reach asks the Commission to move the 1,585 locations to Appendix B4 on the same terms as the Further Reach locations already removed, or in the alternative, to state the criterion that distinguishes them and the evidence supporting it.

III. BACKGROUND

A. Procedural History

Further Reach has been a party to R.23-02-016 since October 3, 2025.

Resolution T-17898 (December 18, 2025) approved a Final Proposal that left most locations in Further Reach's existing-service claim CA-4540 BEAD-eligible. In D.26-06-034 the Commission modified T-17898 and denied rehearing, as modified. Further Reach's petition for writ of review is pending in the Court of Appeal (A176142). Nothing in this application concedes that the National Broadband Map is the only evidence of service, that absence from the map is conclusive, or that the determinations under review in A176142, or the Commission's explanations of them in D.26-06-034, were correct. Where this application cites D.26-06-034, it relies on the rules the Commission stated there.

On May 28, 2026, NTIA issued a curing request finding that, "as a whole, the plan's costs to deploy BEAD are excessive." The request "did not specify a specific project or BSLs connections that were deemed to have excessive costs." (Appendix F, pp. 1–2.) On June 23, 2026, NTIA sent the Commission a list of locations "believed to no longer be eligible" under reason codes 3 and 5 and wrote that "California is encouraged to consider these locations." (Appendix E, Round 7, pp. 63–64.) Appendix F describes this as NTIA's direction "to apply reason codes 3 and 5 to nearly 80K Low Earth Orbit (LEO) preliminarily awarded locations." (Appendix F, p. 4.)

Draft Resolution T-17920 issued July 31, 2026. Further Reach commented on August 20, 2026. The Commission adopted T-17920 on September 17, 2026.

B. The Removals

Appendix B4 lists 64,077 locations removed under reason code 5 with the note "6/9/2026." Each carries evidence type "X," which the Final Proposal Guidance defines as "other evidence." (Final Proposal Guidance v2.1, p. 88.) The resolution describes removals as made "based on NTIA's assessment and Reason Code guidance" and attributes the curing changes in part to "BSL Fabric updates that identified specific BSLs as already served." (Resolution T-17920, pp. 4, 6; see id., p. 6, fn. 3.) It does not otherwise identify the evidence. Each of the 2,379 Further Reach locations noted "6/9/2026" is shown in the FCC's availability data as of December 31, 2025 as served by Further Reach at 100/20 Mbps or better by fixed wireless. (Attachment 2.)

C. Further Reach Locations Removed

The Commission removed 2,381 locations under reason code 5 and listed Further Reach (provider 430037) as the serving provider, at technology code 70 (2,171 locations) or 72 (210 locations). 2,379 carry the note "6/9/2026"; two relocated locations carry "5/24/2026." Attachment 2 lists them.

- 2,040 were in low-earth-orbit projects. All 2,040 were on NTIA's June 23, 2026 list, whose reason-code-5 tab lists locations "still in Fabric Version 8, but ... 'served' in the FCC National Broadband Map," counting technologies "reported at the location with speeds of 100/20 or higher," including code 70 (unlicensed fixed wireless). (Appendix E, Round 7, pp. 60, 63–64, attachment "California_LEO_Locations.xlsx".)

- 341 were in fiber project CA-224. None of the 341 was on NTIA's June 23 list. The resolution does not say why they were removed.
- 1,053 were not in Further Reach's June 2025 claim.
- 355 had been rejected under Appendix A of the Restructuring Policy Notice in July 2025.

D. Further Reach Locations Left in Appendix B3

1,585 locations remain in Appendix B3 that the FCC's availability data as of December 31, 2025 show served by Further Reach at technology code 70 (1,298 locations) or 72 (287 locations), at 100/20 Mbps or better, with low latency. None was on NTIA's June 23 list. Attachment 1 lists each by Appendix B3 project with its FCC technology code; the Appendix B3 fields and the FCC record values common to the listed locations are stated in the attachment's heading.

During curing the projects were renumbered. (Appendix E, Round 1, p. 14; Round 8, p. 68.) Project CA-224 was CM61-BEAD-CA-224-9383 in the approved Final Proposal and is CM61-BEAD-CA-224-14250 in Appendix B3. All 1,140 CA-224 locations in Attachment 1 were in project CM61-BEAD-CA-224-9383, the same project from which the 341 were removed. Project CA-33 was CM61-BEAD-CA-33-1695 and is CM61-BEAD-CA-33-14240.

Further Reach requests that the Commission take official notice of the FCC's National Broadband Map availability data for provider 430037 as of December 31, 2025, and of NTIA's guidance Using BEAD Non-Service Reason Codes During the Period of Performance (July 2026), under Rule 13.10 of the Rules of Practice and Procedure and Evidence Code section 452, subdivisions (c) and (h). Attachments 1 and 2 report the FCC's own records for each location and add nothing to them.

Project	Further Reach locations left in Appendix B3	Total locations in the project in Appendix B3	Further Reach locations removed from the same project
CA-224	1,140	3,892	341
CA-33	445	15,973	0
Total	1,585		341

IV. LEGAL STANDARD

An application for rehearing must "set forth specifically the ground or grounds on which the applicant considers the decision or order to be unlawful." (Pub. Util. Code § 1732.)

The Commission has held that Further Reach's challenge to Resolution T-17898, adopted in the same rulemaking on the same subject, is reviewable under Section 1757.1. (D.26-06-034, p. 5.) The same section governs T-17920. Three of its grounds apply: the decision is an abuse of discretion (§ 1757.1(a)(1)); the Commission has not proceeded in the manner required by law (§ 1757.1(a)(2)); and the decision is not supported by the findings (§ 1757.1(a)(4)).

Abuse of discretion "occurs when a decision is arbitrary, capricious, or entirely lacking in evidentiary support." (D.26-06-034, p. 6, citing California Community Choice Assn. v. Public Utilities Com. (2024) 103 Cal.App.5th 845, 856.) The Commission has applied that standard to Further Reach's locations by asking whether the facts differed, "thereby warranting different outcomes." (D.26-06-034, p. 10.) Where the facts do not differ, different outcomes without a stated reason are arbitrary.

V. THE RESOLUTION IS UNLAWFUL AND ERRONEOUS

A. The Commission Abused Its Discretion by Applying Its Reason-Code-5 Standard to 2,381 Further Reach Locations and Not to 1,585 Locations the Same FCC Data Show Served the Same Way (§ 1757.1(a)(1))

Whatever prompted each removal, the Commission removed 2,381 Further Reach locations under reason code 5, and the resolution does not say which of the bases it describes (Section III.B) applied to any of them. The 1,585 locations in Attachment 1 meet the same test in the same FCC data: the same provider, the same technology codes, 100/20 Mbps or better.

No fact in the record explains the difference. Each criterion that might be offered fails on the Commission's own record:

Possible distinction	**Why it does not explain the result**
Technology of the BEAD award	The Commission removed 341 Further Reach locations from fiber project CA-224. 1,140 of the 1,585 are in that same project.
NTIA's June 23 list	None of the 341 or the 1,585 was on NTIA's list or in any other location file NTIA attached to its curing requests (Appendix E). The list explains the 2,040 low-earth-orbit removals, not the 341.
Appendix A review	355 of the removed locations had been rejected under Appendix A in July 2025. The Commission removed them.
Reduction of the award (Appendix F)	Appendix F states that "the CPUC sought opportunities to remove locations using the Reason Code process where feasible, for projects where such removals could translate into reduced awards and

	yield a higher non-deployment ratio." (Appendix F, p. 4.) Appendix F also states that Staff solicited "the removal of high-cost locations from proposed subgrantees." (Id.) Whether a location is costly to serve does not change whether Further Reach serves it. Cost is not a condition of reason code 5 (Section V.E).
Provisional awardee's agreement	The Guidance lists "Attestation from the provisional awardee that it concurs to not accept a BEAD project for the location(s)" as an example of reason-code-5 evidence. (Final Proposal Guidance v2.1, p. 51.) If that is what separates the 341 from the 1,140, the 1,140 were kept because their awardee wanted them. The attestation is a listed form of evidence, not a condition; the condition is qualifying service in the map, which the 1,140 show on the same data as the 341.

The Commission did not state a reason, and the record supplies none. Removing some locations and retaining others that the same FCC data show served the same way is arbitrary. That is an abuse of discretion.

B. The Resolution Is Not Supported by the Findings (§ 1757.1(a)(4))

Whether a location is already served is the issue that decides its placement in Appendix B3 or B4. It is material to the result for each of the 1,585 locations. The resolution makes no finding on it for any of them. Findings 7 and 10 state that the projects "comply with NTIA's BEAD programmatic rules" and that the revised Final Proposal is "consistent with federal BEAD requirements." (Resolution T-17920, p. 9.) Neither addresses whether the 1,585 are served.

The resolution's findings and appendices support removal of the 2,381. They do not support retention of the 1,585, because the same facts are present for both. A decision that reaches different results on the same facts, without a finding explaining the difference, is not supported by its findings.

If the Commission denies this application, it must identify the criterion that distinguishes the 1,585 from the Further Reach locations it removed, and the record evidence supporting it. If its reason is that removal would not reduce an award, it must say so.

C. The Resolution's Stated Reasons Do Not Distinguish the Two Sets (§ 1757.1(a)(1), (a)(2))

The response to Further Reach's comments gives two reasons for retaining the 872 claim locations: that Staff lacked discretion because T-17920 only ratifies revisions made in

response to NTIA's curing requests (see Resolution T-17898, p. 28, Ordering Paragraphs 2 and 3), and that NTIA has approved every location in Appendix B3:

> *"Staff do not have discretion to remove the 872 locations as part of this Resolution. Consistent with the authority granted to Staff in Resolution T-17898, the purpose of Resolution T-17920 is to ratify revisions to the BEAD Final Proposal based on curing requests from NTIA. Thus, any removal of locations from Appendix B3 and any changes to the BEAD Final Proposal were made at the direction of NTIA. NTIA made no curing requests involving the 872 locations identified by Further Reach, thus Staff did not re-evaluate these locations as part of Resolution T-17920.*
>
> *NTIA has now approved all locations in Appendix B3, including the 872 locations, and the Assistant Secretary of Commerce for Communications and Information has approved the Commission's BEAD Final Proposal. Therefore, no changes to the draft Resolution are warranted based on Further Reach's comments." (Resolution T-17920, p. 8.)*

Neither reason supports the result. First, the lack of discretion described is Staff's, under the delegation in T-17898. The Commission adopted T-17920 itself, ratified Appendix B in full (Ordering Paragraph 1, p. 11), and undertook to determine whether Staff's revisions were "consistent with applicable BEAD program requirements" (p. 2). Treating the limits of Staff's delegation as limits on the Commission's own authority is not the review that ratification required.

The Commission also relied on Staff's statement in T-17898 that it "will continue working with NTIA to make any needed adjustments prior to issuing BEAD awards" when it denied Further Reach's last application. (Resolution T-17898, p. 24; D.26-06-034, p. 13.) That statement was not limited to locations NTIA raised. The Commission cannot rely on it to deny one application and limit it to NTIA's requests to deny the next.

Second, "at the direction of NTIA" does not distinguish the two sets. NTIA asked for "greater scrutiny of its projects based on excessive cost characteristics at the project level and for the state as a whole" (Appendix F, p. 1); its request "did not specify a specific project or BSLs connections" (id., p. 2), and it did not direct that any served location be kept. The resolution attributes the decrease in eligible locations primarily to Fabric updates and to "NTIA's request that California remove high-cost locations based on NTIA's determination that those locations were ineligible" (Resolution T-17920, p. 6, fn. 3), but the 341 were not on NTIA's June 23 list (Appendix E, Round 7), and NTIA's May 28 request named no location.

Third, NTIA's approval does not supply the Commission's reason for treating the same facts differently. NTIA does not receive the evidence behind reason codes with the

Final Proposal (Final Proposal Guidance v2.1, p. 10); none of the 1,585 was on its June 23 list (Appendix E, Round 7); and it approved on July 17, 2026, before Further Reach's August 20 comments. (Resolution T-17920, pp. 2, 7.)

D. The Commission May Correct the Error Now

The Commission may answer that 1,373 of the 1,585 locations were not in Further Reach's 2025 claim or its August 20, 2026 comments. That is not a reason to retain them. Reason code 5 is applied by the Eligible Entity, not the provider, and it required no provider filing: 1,053 of the locations the Commission removed were not in Further Reach's claim. Further Reach's comments objected that 872 claim locations were left in Appendix B3 while the Commission's July 31 exhibits identified 1,344 claim locations as served by a non-subsidized provider. (Resolution T-17920, p. 7.) The response did not address that objection on its merits. (Id., p. 8.) This application raises the same objection for every location the FCC data show Further Reach serving at 100/20 Mbps or better by fixed wireless, including 1,373 that were not in the claim. Sections 1731(b)(1) and 1732 make the application for rehearing the step that preserves an issue for review. The inconsistency arose in T-17920: the 2,381 removals were made during curing, after T-17898, and could not have been raised against T-17898.

NTIA's approval on July 17, 2026 does not bar correction. Ordering Paragraph 1 ratifies "the revised BEAD Final Proposal as set forth in Appendices A, B, and C." (Resolution T-17920, p. 11.) In that ratification the Commission removed the 2,381 and retained the 1,585 that the same FCC data show served the same way. That different treatment is a matter determined in T-17920. The resolution provides for ratification of changes that require NTIA approval (Ordering Paragraph 3, p. 11), and a change that needs NTIA's approval is one Staff can seek. NTIA's guidance states that reason code 5 "may only be applied prior to subgrant agreement execution," and that a removal of 20 percent or 200 locations from a project, whichever is smaller, must be approved by NTIA. (NTIA, Using BEAD Non-Service Reason Codes During the Period of Performance (July 2026), p. 6.)

E. Award Reduction Is Not a Lawful Condition for Applying Reason Code 5 (§ 1757.1(a)(1), (a)(2))

The Final Proposal Guidance makes reason code 5 available "[o]nly for locations with qualifying broadband service in the current National Broadband Map" and requires evidence

that the location is served. (Final Proposal Guidance v2.1, p. 51.) It does not condition removal on whether removal would reduce an award.

The Guidance also says reason code 5 "must be utilized by Eligible Entities wherever possible and accounted for in the Final Proposal." (Id., p. 47.) The Commission has applied that phrase to a Further Reach location. Staff "determined that it was possible to remove Location 24 from BEAD eligibility using Reason Code 5 and applied it" after Further Reach supplied subscriber records. (D.26-06-034, p. 11.) The Commission's explanation turns on the evidence of service.

Appendix F states cost conditions: removal "where feasible, for projects where such removals could translate into reduced awards and yield a higher non-deployment ratio," and the solicitation of "the removal of high-cost locations from proposed subgrantees." (Appendix F, p. 4.) If the 1,585 were retained because removing them would not reduce an award, the Commission applied a condition the rule does not contain. The Guidance addresses cost through a separate code, reason code 7, sub-code "X: Excessive cost" (Final Proposal Guidance v2.1, p. 52). That code requires "a strong showing" (id., pp. 45–46) and may be used only "after it has completed Subgrantee Selection and has consulted with NTIA" (id., p. 13). NTIA's curing instructions say the same: an Eligible Entity unable to justify a project above NTIA's cost threshold "must apply Reason Code 7X to the project locations." (Appendix E, Round 1, p. 5.) The Guidance describes the reason-code process as a means of "efficiently using its BEAD allocation and preventing overbuilding." (Final Proposal Guidance v2.1, p. 43.) An award-reduction test for reason code 5 merges the two codes and defeats that purpose.

This defect does not depend on project boundaries. It applies equally to the 1,140 locations in project CA-224 and the 445 in project CA-33. Within CA-224 the Commission's own action confirms it: the Commission removed 341 Further Reach locations from that project and kept 1,140 that the same FCC data show served the same way.

F. The Restructuring Policy Notice's Unlicensed Fixed Wireless Process Does Not Distinguish the Two Sets

The Commission may answer that, under the Restructuring Policy Notice, locations served by a technology-code-70 provider remain BEAD-eligible when the provider does not respond or does not meet Appendix A. (D.26-06-034, pp. 3, 9.) That rule does not explain the result in T-17920, because the Commission did not treat it as a bar there. In T-17920 the

Commission removed under reason code 5 954 technology-code-70 locations that Further Reach never submitted under the Notice's process, and 355 locations for which Staff had found Further Reach's Appendix A showing insufficient. Forty-one of those 355 were in project CA-224 and were not on NTIA's June 23 list or in any other location file NTIA attached to its curing requests (Appendix E). Of the 2,381 locations removed, 2,171 are technology code 70, including 318 of the 341 in project CA-224; NTIA's June 23 list, the source of 2,040 of them, counted code-70 service shown in the map as service (Section III.C). Further Reach does not contend that any of these removals was improper. It contends only that the Notice's process cannot be the reason the 1,298 technology-code-70 locations in Attachment 1 were kept while 2,171 technology-code-70 Further Reach locations were removed. The Notice's process does not reach the 287 technology-code-72 locations in Attachment 1 at all; it applies to locations the map shows served by a technology-code-70 provider. (D.26-06-034, p. 7, quoting the Notice at p. 14.) Nothing in this section concedes that the Notice's process was correctly applied to claim CA-4540, including Location 24; that question is before the Court of Appeal in A176142.

G. Further Reach's Other Claim Locations

Further Reach does not contend that T-17920 determined anew the placement of the 660 locations in its claim CA-4540 that remain in Appendix B3 and are not listed in Attachment 1. The resolution states that Staff "did not re-evaluate" the 872 claim locations Further Reach's comments identified "as part of Resolution T-17920" (Resolution T-17920, p. 8), and their placement is before the Court of Appeal in A176142.

VI. RELIEF REQUESTED

Further Reach respectfully requests that the Commission:

1. Grant this Application for Rehearing;

2. Modify Resolution T-17920 to find that the 1,585 locations listed in Attachment 1 are already served by a non-subsidized service under reason code 5, provider 430037, at the technology code shown for each in the FCC data, and to move them from Appendix B3 to Appendix B4;

3. To the extent NTIA approval is required for that change, direct Staff to request NTIA's approval of it within 30 days of the order, and in any event before executing

subgrant agreements for projects CA-224 and CA-33, and to submit the change for ratification as Ordering Paragraph 3 of Resolution T-17920 requires;

4. In the alternative, state, for the 1,140 locations in project CA-224 and the 445 in project CA-33, the criterion on which the Commission retained them, the record evidence supporting it, and how that criterion distinguishes them from the Further Reach locations the Commission removed.

Further Reach does not seek, and nothing in this application requests, any change to the treatment of the 2,381 locations in Appendix B4. Further Reach does not contend that the evidence on which the Commission removed them was insufficient.

VII. ATTACHMENTS

Attachment 1: The 1,585 Further Reach locations retained in Appendix B3, listed by Appendix B3 project with the FCC technology code for each. The heading states the Appendix B3 fields and the FCC availability record as of December 31, 2025 common to the listed locations and marks the exceptions.

Attachment 2: The 2,381 Further Reach locations removed to Appendix B4 under reason code 5, listed by prior project with the Appendix B4 technology code for each. The heading states the Appendix B4 fields and the FCC availability record as of December 31, 2025 common to the listed locations and marks the exceptions.

Dated: 16 October 2026

Respectfully submitted,

/s/ Tamir Scheinok

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ATTACHMENT 1

FURTHER REACH LOCATIONS RETAINED IN APPENDIX B3 (1,585)

Source: Resolution T-17920 Appendix B3 (adopted September 17, 2026), joined on location ID to the FCC National Broadband Map availability data for provider ID 430037 (Further Reach) as of December 31, 2025. Each entry is the location ID followed by the FCC technology code at which the data show Further Reach serving that location (70, unlicensed fixed wireless; 72, licensed-by-rule fixed wireless).

Fields common to every listed location: Appendix B3 award technology 50 (fiber); Appendix B3 award speed 2,500/2,500 Mbps for project CM61-BEAD-CA-224-14250 and 5,000/5,000 Mbps for project CM61-BEAD-CA-33-14240; FCC record 200/200 Mbps, low latency, except as marked. Markers: * in ULFW Existing Service Claim CA-4540 (June 2025) (212 locations); † FCC record 100/100 Mbps, low latency (39 locations).

Counts: CM61-BEAD-CA-224-14250, 1,140 locations (technology code 70: 878; 72: 262). CM61-BEAD-CA-33-14240, 445 locations (technology code 70: 420; 72: 25). Total 1,585 (70: 1,298; 72: 287).

A. Project CM61-BEAD-CA-224-14250 (formerly CM61-BEAD-CA-224-9383) — 1,140 locations

1313225414 72	1313225535 72	1313227239 70	1313228376 72	1313228881 72
1313228912 72	1313229569 72	1313229600 70	1313229691 70	1313229722 70
1313230906 70	1313232198 70	1313232467 70	1313234297 70	1313235586 70
1313236068 70	1313236520 72*	1313236765 72	1313236944 72	1313237993 70
1313238111 72	1313239569 70	1313244726 70*	1313245147 70*	1313253400 70
1313253428 72*	1313253519 70	1313254474 70	1313255041 70	1313259235 70
1313260855 70	1313261875 70	1313262160 70	1313264524 70*	1316207975 70
1316208457 72	1316209030 70	1316209241 70	1316209362 70	1316209848 70
1316209879 70	1316224685 70	1316225051 70	1316225120 70	1316225183 70
1316225749 70	1316225866 70	1316225876 72	1316225880 72	1316225881 72
1316225882 70*	1316225883 72	1316225893 72	1316225894 72	1316225895 72
1316225896 72	1316225897 72	1316225899 72	1316225900 72	1316225901 72

1316225902 72	1316225903 72*	1316225904 72	1316225905 72	1316225906 70
1316225907 72	1316225912 72	1316225913 70	1316225948 72	1316225951 70
1316225952 72	1316225953 72	1316225954 70	1316225955 72	1316225956 72
1316225957 72	1316225958 72	1316225959 70	1316225960 70†	1316225961 72
1316225962 72	1316225963 70	1316225964 72	1316225965 72	1316225966 72
1316225975 70	1316225979 70	1316225981 72	1316226009 70	1316226010 70*
1316226011 70	1316226014 70	1316226049 70	1316226050 70	1316226051 70
1316226052 70	1316226056 70	1316226057 70	1316226058 72	1316226059 70
1316226060 70	1316226061 70	1316226064 70*	1316226068 70	1316226069 72
1316226070 72	1316226071 70	1316226072 72	1316226073 70	1316226074 70
1316226075 70	1316226076 70	1316226077 70	1316226078 70	1316226079 70*
1316226080 72	1316226081 70	1316226082 70	1316226083 70	1316226084 70*
1316226087 70	1316226088 70*	1316226089 70*	1316226090 70	1316226092 70*
1316226093 70	1316226094 70	1316226095 70	1316226096 70	1316226097 70
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1316226145 70	1316226146 72*	1316226148 72	1316226150 70	1316226151 70*
1316226152 70	1316226153 70	1316226154 70	1316226156 70	1316226157 70*
1316226158 72	1316226160 70	1316226163 72	1316226165 72	1316226167 70*
1316226168 70*	1316226217 72*	1316226219 70	1316226220 70	1316226221 70
1316226223 70	1316226224 70	1316226227 70	1316226228 70	1316226241 72
1316226242 70	1316226244 70	1316226245 70	1316226247 70	1316226248 70
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1316226258 72	1316226259 72	1316226260 72	1316226261 72	1316226263 70*
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1316226269 72	1316226272 72*	1316226273 72	1316226274 72*	1316226275 72
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1316226283 70	1316226284 70	1316226285 72*	1316226287 72	1316226288 70
1316226289 70	1316226291 72	1316226292 72*	1316226294 72*	1316226295 72
1316226296 72	1316226297 72	1316226298 72	1316226299 72*	1316226300 72
1316226301 72	1316226307 70	1316226353 70†	1316226354 70	1316226355 70

1316226356 70	1316226357 70	1316226358 72	1316226359 70	1316226360 70
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70*†

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1483015859 70	1483015884 70	1483016046 70*	1483016242 72	1483020024 70

B. Project CM61-BEAD-CA-33-14240 (formerly CM61-BEAD-CA-33-1695) — 445 locations

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1316250992 70 1316250993 70 1316251001 70 1316251008 70* 1316251009 70*
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1483004766 70 1483008687 70 1483017344 70* 1483017458 70 1483019031 70

ATTACHMENT 2

FURTHER REACH LOCATIONS REMOVED TO APPENDIX B4 UNDER REASON CODE 5 (2,381)

Source: Resolution T-17920 Appendix B4 (adopted September 17, 2026), rows with reason code 5 and provider ID 430037; prior project from the Final Proposal approved by Resolution T-17898; FCC National Broadband Map availability data for provider ID 430037 (Further Reach) as of December 31, 2025. Each entry is the location ID followed by the Appendix B4 technology code (70 or 72), which is also the technology code at which the FCC data show Further Reach serving that location.

Fields common to every listed location: Appendix B4 reason code 5; evidence type X; provider 430037; note "6/9/2026"; FCC record 200/200 Mbps, low latency, except as marked. Markers: * in ULFW Existing Service Claim CA-4540 (June 2025) (1,328 locations); † FCC record 100/100 Mbps, low latency (28 locations); ‡ relocated location, Appendix B4 note "5/24/2026", no FCC record under this location ID (2 locations).

Counts: CM61-BEAD-CA-291-9420 (award technology 61, low-earth-orbit), 1,525 locations. CM61-BEAD-CA-183-1905 (award technology 61, low-earth-orbit), 515 locations. CM61-BEAD-CA-224-9383 (award technology 50, fiber; now CM61-BEAD-CA-224-14250), 341 locations. Total 2,381 (technology code 70: 2,171; 72: 210).

A. Prior project CM61-BEAD-CA-291-9420 (low-earth-orbit) — 1,525 locations

1313221759 70	1313231839 70	1313233307 70*	1313234959 70	1313235526 70
1313259204 70	1316224450 70*	1316224637 70*	1316224678 70	1316224683 70
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1316224947 70	1316224948 70	1316224951 70	1316224958 70	1316225009 70
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1316225165 70	1316225168 70	1316225238 70	1316225290 70	1316225298 70*
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1316226225 72	1316226243 72*	1316226270 72	1316226271 72	1316226370 72
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B. Prior project CM61-BEAD-CA-183-1905 (low-earth-orbit) — 515 locations

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1316250752 70	1316250786 70	1316250849 70*	1316250879 70	1316250977 70*
1316250995 70*	1316251122 70	1316251162 70	1316251214 70	1316251215 70
1316251217 70	1316251238 70	1316251433 70*†	1316251453 70	1316251485 70*
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1316251956 72	1316252613 72	1316252939 72	1316253060 70*	1316253074 70*
1316253080 70*	1316253083 70*	1316253095 70*	1316253125 70*	1316253210 70*
1316253215 72	1316253223 72*	1316253224 72	1316253236 72*	1316253255 70
1316253313 70*	1316253314 70	1316253355 70*	1316253393 70*	1316253397 70*
1316253398 70*	1316253402 70	1316253418 70	1316253459 70*	1316253461 70*
1316253466 72*	1316253480 70	1316253507 70*	1316253510 70*	1316253519 70*
1316253529 70*	1316253604 70	1316253613 70*	1316253633 72	1316253636 72*
1316253643 70*	1316253644 70	1316253668 70*	1316253888 70*	1316253895 70*
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1378285369 70*	1378300878 72*	1378300879 72*	1378300880 72*	1378300881 72
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1483010846 70*	1483010953 70	1483010954 70*	1483011332 70*	1483011512 70*
1483012162 70	1483013716 70*	1483016849 70	1483017269 70	1483017306 70

C. Prior project CM61-BEAD-CA-224-9383 (fiber) — 341 locations

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1316224813 70*	1316224814 72	1316224815 70*	1316224816 70	1316224817 70
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