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Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

**RE: Docket No. UT-240182-Island Network, LLC dba Rock Island Communications
Petition for Designation as an Eligible Telecommunication Carrier – RESPONSE TO
STAFF QUESTIONS**

Dear Mr. Killip,

Staff has requested additional information regarding the Petition of Island Network, LLC dba Rock Island Communications (“Rock Island” or the “Company”) where the Company is seeking designation as an Eligible Telecommunications Carrier for purposes of becoming eligible to receive Rural Digital Opportunity Funds.

In addition to the responses below, Rock Island provides as Attachment C the Company’s Project Overview and Deployment Strategy. The Company provides the following responses to Staff:

1. At page 1 of the petition, at the end of the first paragraph, there is an incomplete sentence. Please explain?
RESPONSE: Attachment A contains a revised page 1 of the application.
2. At page 2 of the petition, at the end of the first full paragraph, it states “Central Washington.” Does the company agree that San Juan County is more physically located in the “northwest quadrant of Washington State?”
RESPONSE – Attachment B is a revised page 2 of the application.
3. At page 3 of the petition, it discusses the Commnet Agreement; please provide a copy of the agreement (both in redacted and unredacted versions)?
RESPONSE: This was provided to Staff on May 16, 2024.
4. At page 4 of the petition, under subsection vii.; please provide additional details on how the company remains functional in emergencies, the types and capacities of battery backup power and mobile backup generators a) that are currently deployed, and b) that are planned to be deployed?

RESPONSE: The grid is a fully redundant, active ethernet ring network. The sites deploying the last mile connections and connections to wireless sites are a dual lag 40Gig ring network with connectivity to at least one and up to three separate CO locations in the county. All sites at minimum are equipped with an eight-hour battery run time. All wireless sites and some FTTH cabinets are equipped with standby automatic transfer generators and fuel storage to handle multi-day outages of the power grid. The transport network is fully redundant 100Gig lags on two separate cable paths out of county to the Westin and South Hill Exchanges in Seattle and Kent Washington State. Additional back-up facilities are positioned on each island for emergency recovery with a full-time field staff of 12 persons residing in county and on call.

5. At page 7 of the petition, under section D.; please confirm that speeds of 100 Mbps download and 20 Mbps upload are the minimum broadband speeds that will be provided?

RESPONSE: The Company confirms these speeds will be the minimum standard for deployed technology service speeds available.

6. Please list all voice and broadband service offerings in the State of Washington and state the price of each by the following categories:

RESPONSE:

- a. RDOF area price(s)
 - i. 25/25Mb Fixed Wireless \$80/mo
 - ii. 100/20Mb Fixed Wireless \$90/mo
 - iii. 150+/20Mb Fixed Wireless \$105/mo
 - iv. 100/100Mb Fiber Internet \$85/mo
 - v. 200/200Mb Fiber Internet \$100/mo
 - vi. 500/500Mb Fiber Internet \$130/mo
 - vii. 1000/1000Mb Fiber Internet \$185/mo
 - viii. 2000/2000Mb Fiber Internet \$285/mo
- b. Non-RDOF area price(s)
 - i. 25/25Mb Fixed Wireless \$80/mo
 - ii. 100/20Mb Fixed Wireless \$90/mo
 - iii. 150+/20Mb Fixed Wireless \$105/mo
 - iv. 100/100Mb Fiber Internet \$85/mo
 - v. 200/200Mb Fiber Internet \$100/mo
 - vi. 500/500Mb Fiber Internet \$130/mo
 - vii. 1000/1000Mb Fiber Internet \$185/mo
 - viii. 2000/2000Mb Fiber Internet \$285/Kasey

7. How is 911 service provisioned in the RDOF areas?

RESPONSE: Our Partnership is with SkySwitch who is a wholesale phone provider who handles all routing over our internet network from the customer site out. Rock Island is a reseller of this services for VOIP phone service.

8. How is 911 service provisioned in the Non-RDOF areas?

RESPONSE: Our Partnership is with SkySwitch who is a wholesale phone provider who handles all routing over our internet network from the customer site out. Rock Island is a reseller of this services for VOIP phone service.

9. What are the estimated timeframes for your deployment of RDOF locations?

RESPONSE:

a. How many RDOF locations were deployed in the proposed designation area(s) as of 12/31/2023?

**1288 Fiber Locations
3183 Wireless Locations**

b. How many estimated RDOF locations will your company deploy to by the end of this year (2024)?

**350 Additional Fiber Locations
1250 Additional Wireless Locations**

c. How many estimated RDOF locations will your company deploy to by the end of this year (2025)?

**250 Additional Fiber Locations
752 Additional Wireless Locations**

10. What work has your company completed to make sure you can meet the 2025 deployment benchmark obligation(s)?

RESPONSE: We already have the middle mile and transport networks completed for all the additional new site locations for wireless. We have performed site acquisition for the wireless locations and we are currently in the middle of excavating 30 miles of new fiber within the census blocks for additional services ready by 2024/2025.

11. Please provide a .csv file with the location data for each census block (and .shp file as well if possible).

RESPONSE: This was provided to Staff on May 16, 2024.

If you have any questions regarding this filing, please contact me at (407) 794-3488 or regulatory@csilongwood.com.

Respectfully submitted,

/s/ Mark Lammert

Mark Lammert
Attorney-in-Fact
Island Network, LLC dba Rock Island Communications

Attachment A

Island Network, LLC dba Rock Island Communications

Correction to Page 1 of Petition

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Petition of Island Network, LLC
dba Rock Island Communications
For Designation as an Eligible
Telecommunications Carrier to
Receive Rural Digital Opportunity
Fund (“RDOF”) Support

Docket No. UT-_____

**PETITION OF ISLAND NETWORK, LLC DBA ROCK ISLAND
COMMUNICATIONS FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER TO RECEIVE RURAL DIGITAL
OPPORTUNITY FUND (“RDOF”) SUPPORT**

Island Network, LLC dba Rock Island Communications (“Rock Island” or the “Company”) respectfully submits this Petition for designation as an Eligible Telecommunications Carrier (“ETC”) to the Washington Utilities and Transportation Commission (“Commission”) pursuant to 47 U.S.C. § 214(e) of the Commission Act of 1934, as amended (the “Act”), Part 54, Subpart C of the rules of the Federal Communication Commission (“FCC”), and WAC § 480-123-030 through 040. Rock Island seek designation throughout Washington.

Sections 214(e)(2) and 254 of Title 47 of the United States Code expressly authorize the Commission to designate a company that meets the requirements of 47 U.S.C. § 214(e)(1) – such as Rock Island – as an ETC. Moreover, Washington State law requires that the Commission “will approve a petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030 the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.” As demonstrated in this Petition, Rock Island meets all state and federal requirements for ETC designation, and, as shown by the

Attachment B

Island Network, LLC dba Rock Island Communications

Correction to Page 2 of Petition

description herein of Rock Island's planned voice and broadband deployment projects, designating Rock Island as an ETC in the proposed area would advance the goals of universal service and is in the public interest. Rock Island requests an order from the Commission granting ETC designation conditioned upon Rock Islands's acquisition of Commnet's [RDOF I] award and assumption of the associated obligations within San Juan County.

In support of this Petition, Rock Island states as follows:

I. BACKGROUND

Rock Island is a Washington corporation headquartered in Eastsound, Washington. Rock Island has been registered with the Washington Secretary of State since 2015, UBI Number 603-466-410. Rock Island was classified as a competitive telecommunications carrier by the Commission on December 27, 2023, in docket UT-231008, and has provided voice and Internet service in Northwest Washington since 2001.

Rock Island was founded as a wholly owned for profit subsidiary of Orcas Power & Light Cooperative (OPALCO), the local non-profit electric cooperative in San Juan County, Washington. Rock Island provides the rural area of San Juan County in Washington State with telecommunications service, delivered at a reasonable price. Rock Island currently provides voice and broadband services to approximately 6,500 customers of rural San Juan County, Washington, using 5G fixed wireless and active ethernet fiber-to-the-home technologies.

Rock Island's address and telephone number are set forth below:

Attn: Alan Smith
Island Network, LLC dba Rock Island Communications
208 Enchanted Forest Road, Suite D
Eastsound, WA 98245
(360) 378-5884
<https://rockisland.com/>

Attachment C

Island Network, LLC dba Rock Island Communications

Project Overview

PROJECT OVERVIEW

Rock Island Communications as to the state of Washington, hereby submits its Initial Project Overview exhibit, (Rock Island Communications is a wholly owned Subsidiary Company of the Power Cooperative, Orcas Power and Light Cooperative, OPALCO) the original applicant's winning bids (CommNet Wireless) were all for the Above Baseline level, *i.e.*, 100/20 Mbps speeds with low latency and 2 TB of monthly usage. This exhibit summarizes how Rock Island Communications intends on satisfying the original Applicant's intentions by way of transfer of award meet or exceed those thresholds within the required time periods of the RDOF program.

The subsidiary ISP (Rock Island) was birthed from a critical failure of local internet infrastructure in the San Juan Islands. Orcas Power and Light Cooperative is the sole provider of power in San Juan County, as it receives its power from a submarine cable handoff from Bonneville Power Administration. Rock Island is a dedicated subsidiary charged with delivering a true broadband solution to the members of the cooperative. Their service territories are fully congruent and the infrastructure for broadband is simultaneously used to support the microgrid and Supervisory Control and Data Acquisition (SCADA) for the power utility. Cooperatives are formed from a collective interest in expanding access to utilities in remote areas. Orcas Power and Light is a posterchild of the success a cooperative can have as it collectively constructed a 20-island grid for power in a challenging remote island archipelago. With wireless technologies, even more remote, non-power-served islands have access to broadband from the Rock Island Network within the County boundary for the service territory.

Basic System Design

Rock Island will provide both voice and broadband service using a combination of fixed wireless technology and fiber to the premise (FTTX). Rock Island is in a long term MVNO partnership with T-Mobile USA and has been granted access to all spectrum owned by T-Mobile in San Juan County, Washington. Rock Island also intends to use 60 MHz of CBRS spectrum (3.5-3.65 GHz) which is readily available to the Applicant by combining PALs and GAA. Applicant will use technologies based on open industry standards, such as LTE and 5G. Rock Island will backhaul all services on fiber technology to connect each fiber fed customer and wireless site to its core network and the internet using its existing redundant 100 Gig fiber transport paths to two separate, existing internet exchange presences.

To meet both the 100 Mbps downlink and 20 Mbps uplink speeds, Rock Island will ensure that the wireless design delivers strong enough signal across a sufficient spectrum to deliver a high quality of experience for its customers. To meet the low latency requirement (<100 ms), Rock Island will expand its well-proven, currently-deployed wireless network (38 existing

sites in San Juan County) and individual fiber to the premise, to the locations served by this award.

Voice Service

Rock Island has been serving voice subscribers for 30 years, and its voice offerings have always met the quality requirements imposed upon Auction 904 participants. Rock island is partnered with a Managed Voice Service Provider (“MVSP”) for Auction 904 voice services. Rock Island’s current MVSP provides standalone residential voice service, standalone business voice service, hosted PBX service and SIP trunking utilizing Network Function Virtualization-based Voice over LTE (NFV based VoLTE).

Network Performance

Rock Island relies upon its real-world experience in operating its existing networks, which have demonstrated a specific percentage usage rate during the busy hour, with a busy hour usually occurring in the early evening. Because Rock Island’s experience in networks is specific to these winning-bid markets here, the translation of real-world usage distribution data enables the optimum in network design for the prospective subscribers for the Auction 904 markets. Rock Island will expand facilities sufficient in capacity to enable all of those simultaneous users to receive service at the Above Baseline level. Each Auction 904 network will be monitored consistently, and its engineering design constantly modified and enhanced throughout its lifetime, to maintain the Above Baseline speed and latency requirements.

Rock Island will project per-site capacity demands based on considerations of existing and forecasted subscription rates/usage as well as industry projections on per-user data usage year-over-year growth rates. Rock Island monitors, in real-time, its penetration rate and site health to ensure the capacity requirements are met. And as needed, if penetration rates increase above that originally projected design, transfer customers to fiber technologies where available to increase service reliability on wireless.

Rock Island may choose to leverage what new innovative features/technologies are launched by wireless standards through its partner, T-Mobile, or individually in the years to come, ensuring its ability to meet and maintain service requirements as efficiently as possible. Which of these techniques to use in any given situation necessarily must be decided after the initial construction is completed, and the network is launched in the involved area. The choice will be based upon the initial build-out, the geographic distribution of the unexpected demand or usage, and all the other factors mentioned above. Rock Island’s network operations personnel are experienced, especially in delivering quality service to remote and rural San Juan County, and those personnel will ensure that Rock Island will continue to meet the required system performance metrics throughout the life of the program.

Rock Island intends to thoroughly characterize the network to ensure that each customer has sufficient signal strength and quality to ensure the ability to efficiently deliver broadband service at Above Baseline levels.

Network Management

Rock Island maintains a local presence of network operations and design facilities, as well as an equipment warehouse, and a locally based staff of 36 full time employees including engineers, technicians and specialists at its two office and warehouse locations in San Juan County. These facilities already support Rock Island's domestic fiber and wireless operations across San Juan County, serving 22 inhabited islands in the County. Rock Island already serves 52% of voice and broadband subscribers in San Juan County. The added traffic generated by the Auction 904 build-out will be less than the normal internal growth from non-auction facilities. Stated simply, Rock Island has economies of scale from its incumbent operations that enable it to maintain and service the Auction 904 networks without having to create new support structures.

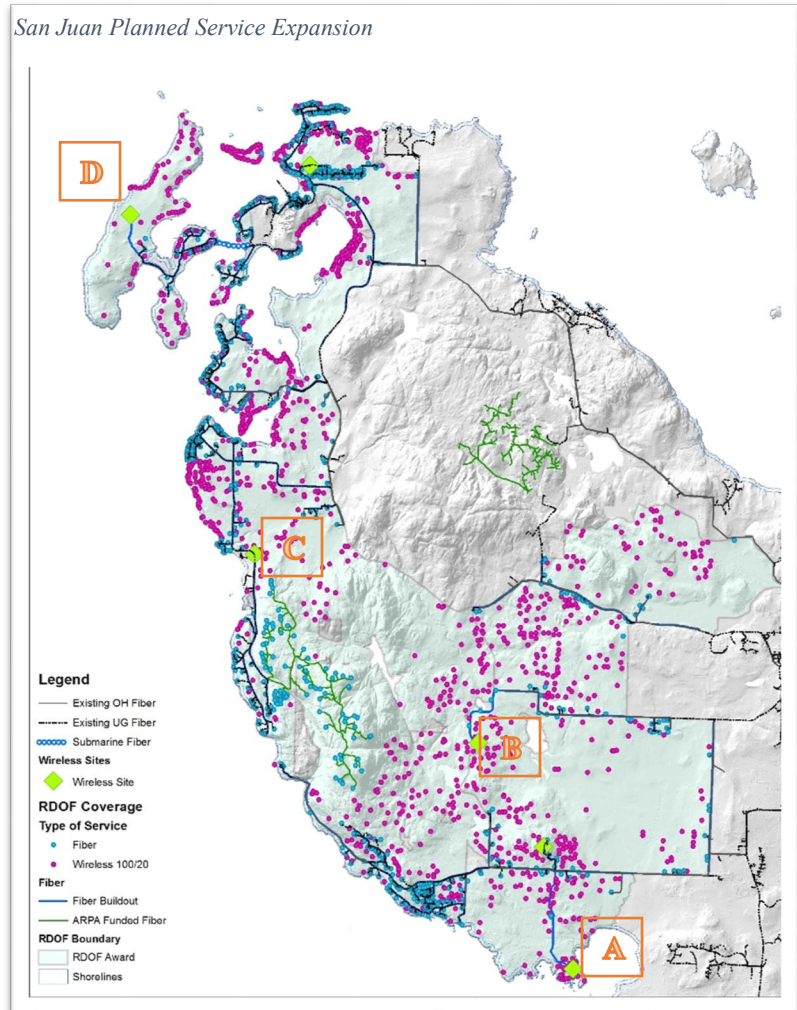
With Rock Island's seasoned staff of professionals, the ISP has delivered on a remarkable 99.99% reliability rate for services in San Juan County, as well as back to local exchanges in the South Puget Sound area. Since the local landscape and sometimes inadvertent storms that frequent the marine environment of the Salish Sea can impact power availability, many additional steps have been taken by Rock Island to ensure up-time performance despite power grid failures. All active site cabinets which feed fiber customers are equipped with 8-hour battery run time. If power loss extends beyond four hours, the 24/7 staffed Network Operation Center (NOC) dispatches field crews to connect temporary standby generators to the active site location. Each warehouse location houses five temporary standby generators that can be deployed by field personal. All locations managed during an event are staffed with field teams until the event is fully clear and all sites are returned to nominal operation.

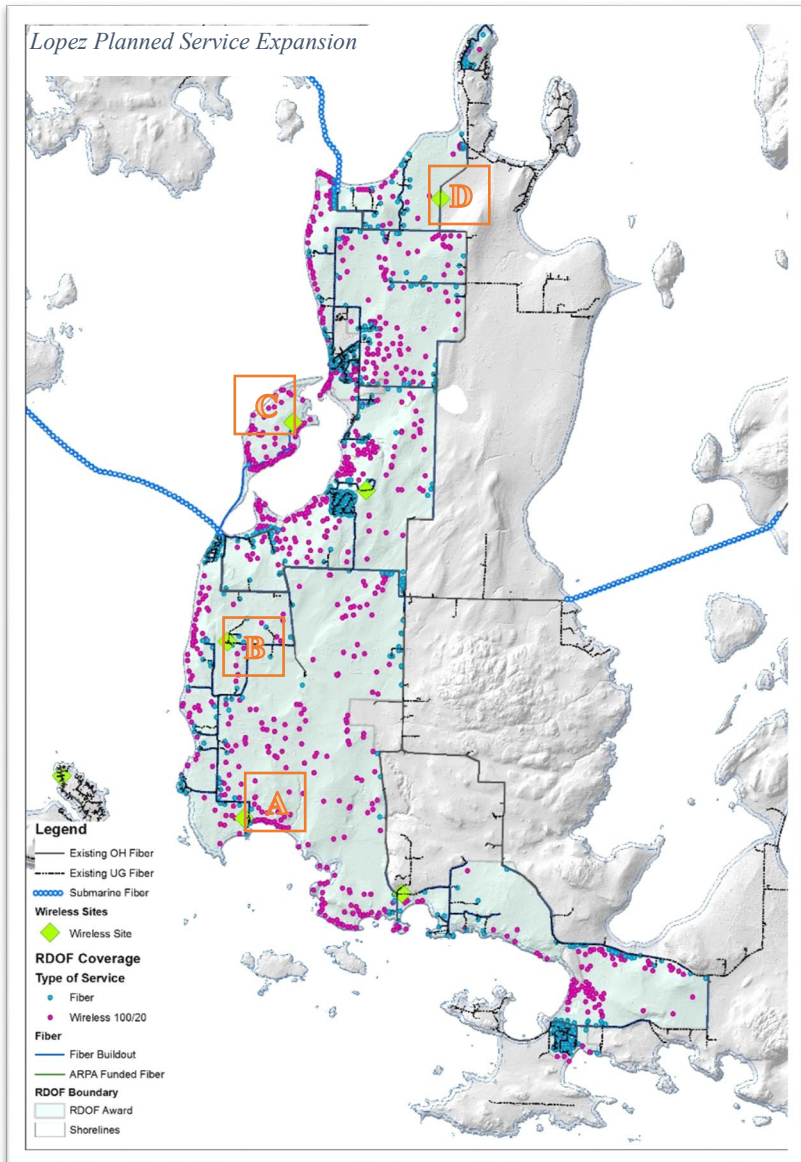
Since wireless sites are more critical for communication and emergency services provided to local agencies of San Juan County, these sites are equipped with permanent standby generators and locally stored fueling for long term events. During an event, these sites roll automatically to backup generator support via the Automatic Transfer Switch (ATS). If a site fails to roll over to back up generation, the NOC dispatches field staff to the site while it remains on its DC battery supply to enable the cutover. This rarely occurs during active events, since the generation equipment performs weekly operating tests which are monitored by the NOC. Total standby time varies for each site depending on location and the associated response times. Sites accessible by local, on-island staff, are equipped with a minimum 48-hour runtime of standby power. While non-staffed and non-ferry served island locations are equipped with a minimum 72-hour standby runtime.

Expansion Plans for RDOF Blocks

For the areas under consideration for transfer from CommNet to Rock Island, Rock Island currently maintains a strong presence of both fiber to the home service and fixed wireless service. The plan is to maintain a hybrid option of service which will provide a minimum of 100/20 Mb speeds and in many other cases, full gigabit service to these locations in the census blocks. To meet the required 100% coverage by the end of the funding program, Rock Island will install eight new wireless sites on San Juan Island and Lopez Island to increase the throughput capacity of the wireless coverage for these challenging topographies. Rock Island's partner, T-Mobile, has already completed the radio frequency designs and Rock Island has secured the site locations needed to install new radio communication equipment on existing utility infrastructure within already obtained easements. New fiber backhaul will be extended to these sites which will create additional fiber to the home options of gigabit service along the transport paths. These new sites will provide a minimum of 100/20 Mb, low latency service by 2028 to all locations.

The first new site is scheduled to be constructed on Lopez Island in August 2024. These sites are supplemental to the already existing 38 sites Rock Island maintains in San Juan County. These existing sites have been on an upgrade project schedule since 2022 which has been adding twice the spectrum capacity to each site. 19 of the 38 sites are complete as of January 2024 with the remaining sites scheduled for completion by 2026. The presence of wireless and fiber to the premise service from Rock Island which meets or exceeds the funding program requirements is available today to 1,561 of the 3,672 (42.5%) broadband service locations within the census blocks for this award. Given the already scheduled upgrades to sites, the additional funding obtained for gigabit fiber service to over 150 locations within the blocks through ARPA and these planned new sites, this additional funding from the RDOF award will enable Rock Island to meet the milestone coverage obligations ahead of schedule for the RDOF program.



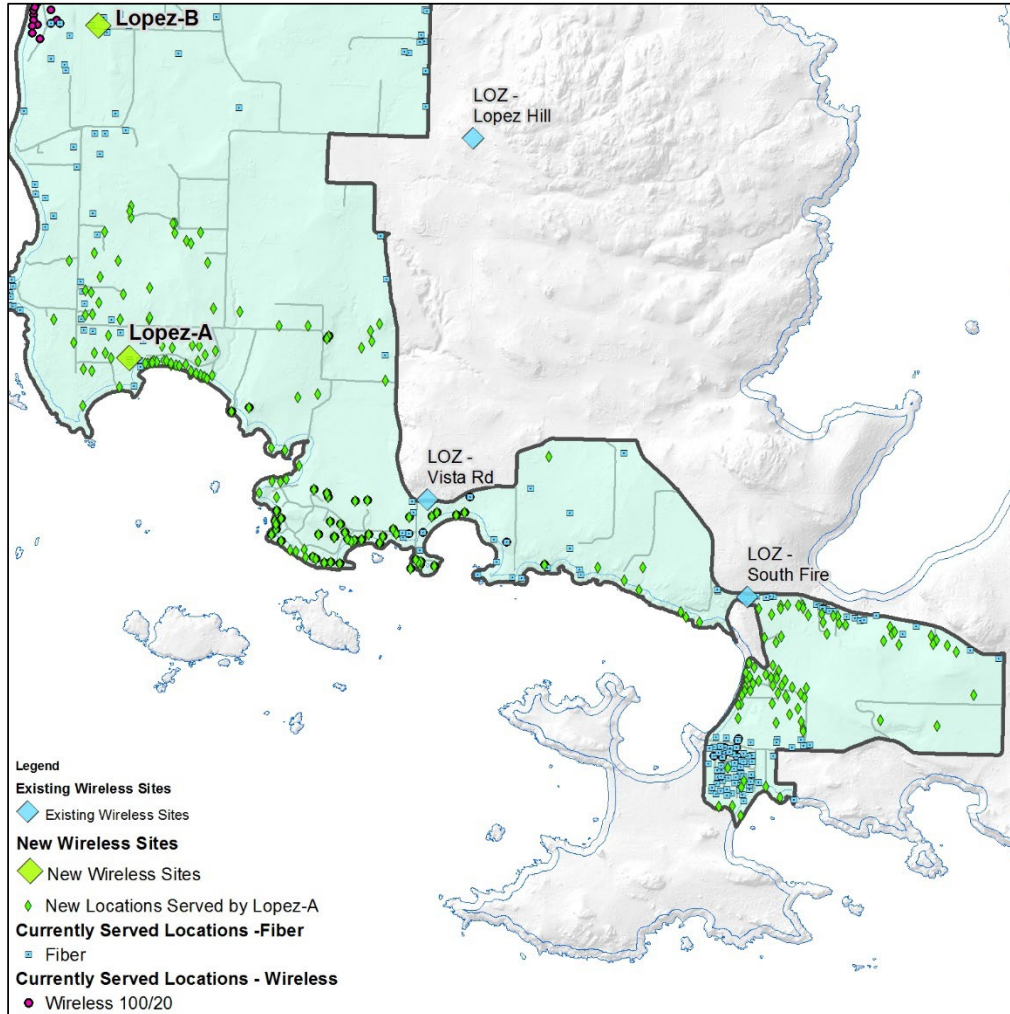


Since Rock Island exists under the cooperative utility designation, the access to easements and facilities for these improvements are already established. This streamlines the construction process for all projects, both for fiber excavation and wireless installation. In addition, multiple subcontracted service companies are signed under a Master Service Agreement to complete work under a unit price contract. This allows Rock Island to accurately project costs and speeds up the project deployment for specific projects while maintaining ease of flexibility in design and scope changes.

Ultimately, Rock Island has the underlying goal of deploying fiber to all locations in San Juan County. This directive comes from the board of directors that govern the power cooperative and Rock Island as a business. Wireless is a faster deployment technology, but it is not a future proof solution for long term broadband needs. Rock Island will continue to aggressively seek funding from programs supporting fiber to the home such as BEAD to further expand this advanced service option to local residents.

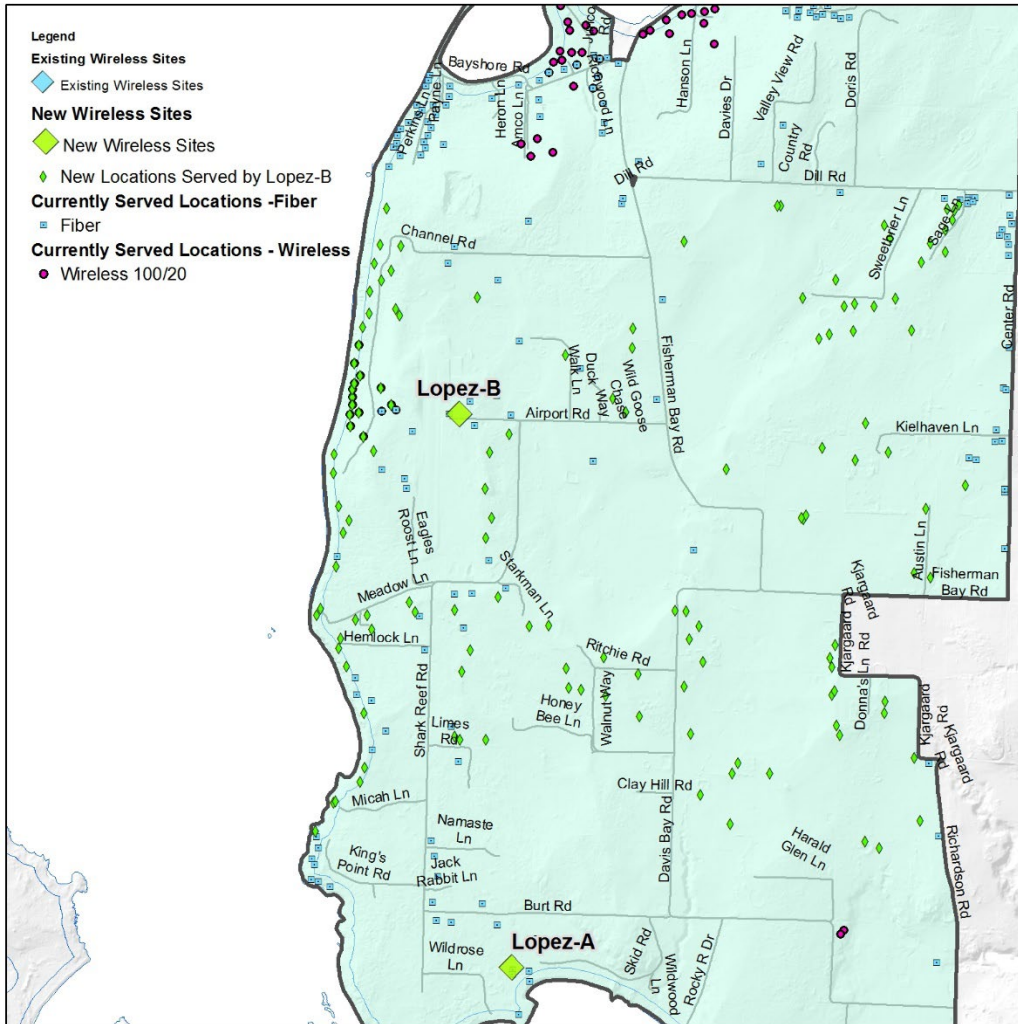
Expansion Plan Details

Lopez Site A –



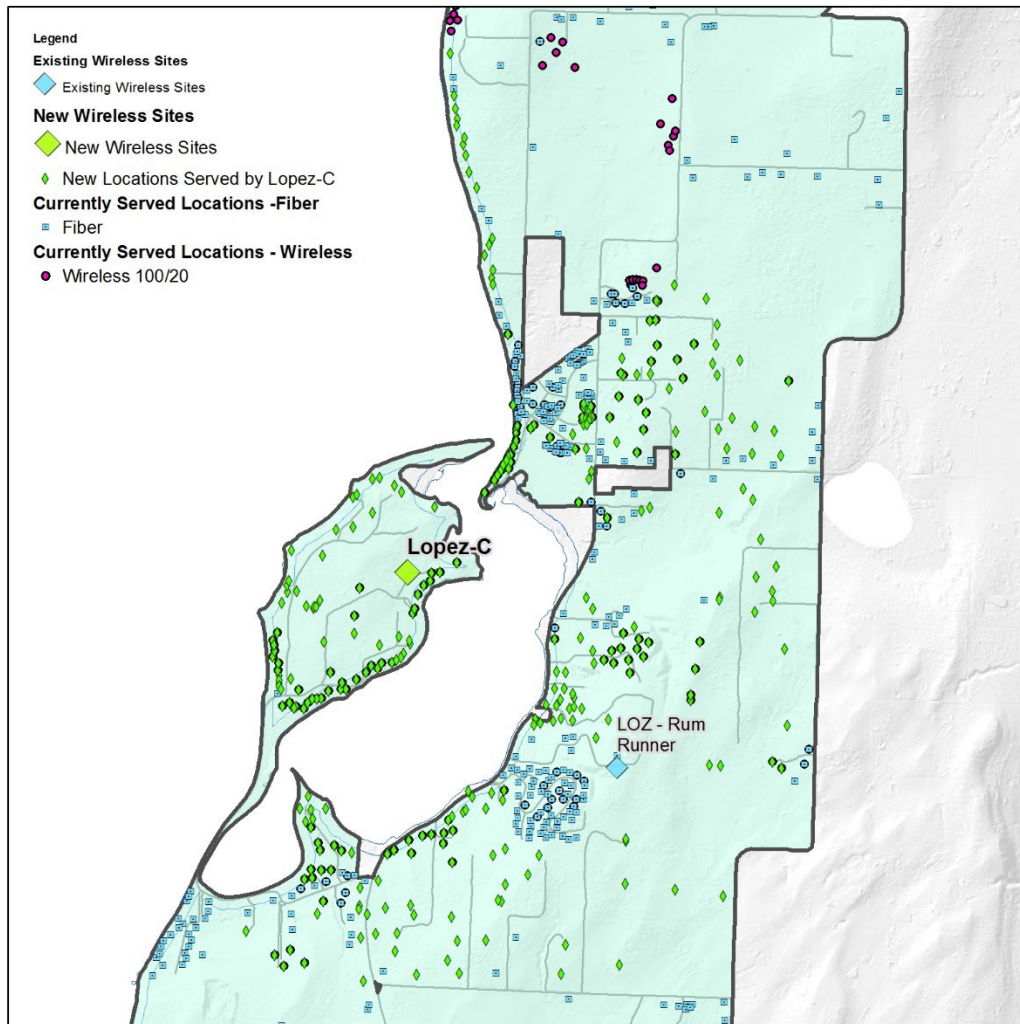
This site location assists in filling in the southern shoreline exposure on Lopez Island. The new site compliments two other southern sites already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. Along with the planned upgrades to the existing sites, this site will provide required wireless service to **219 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

Lopez Site B –



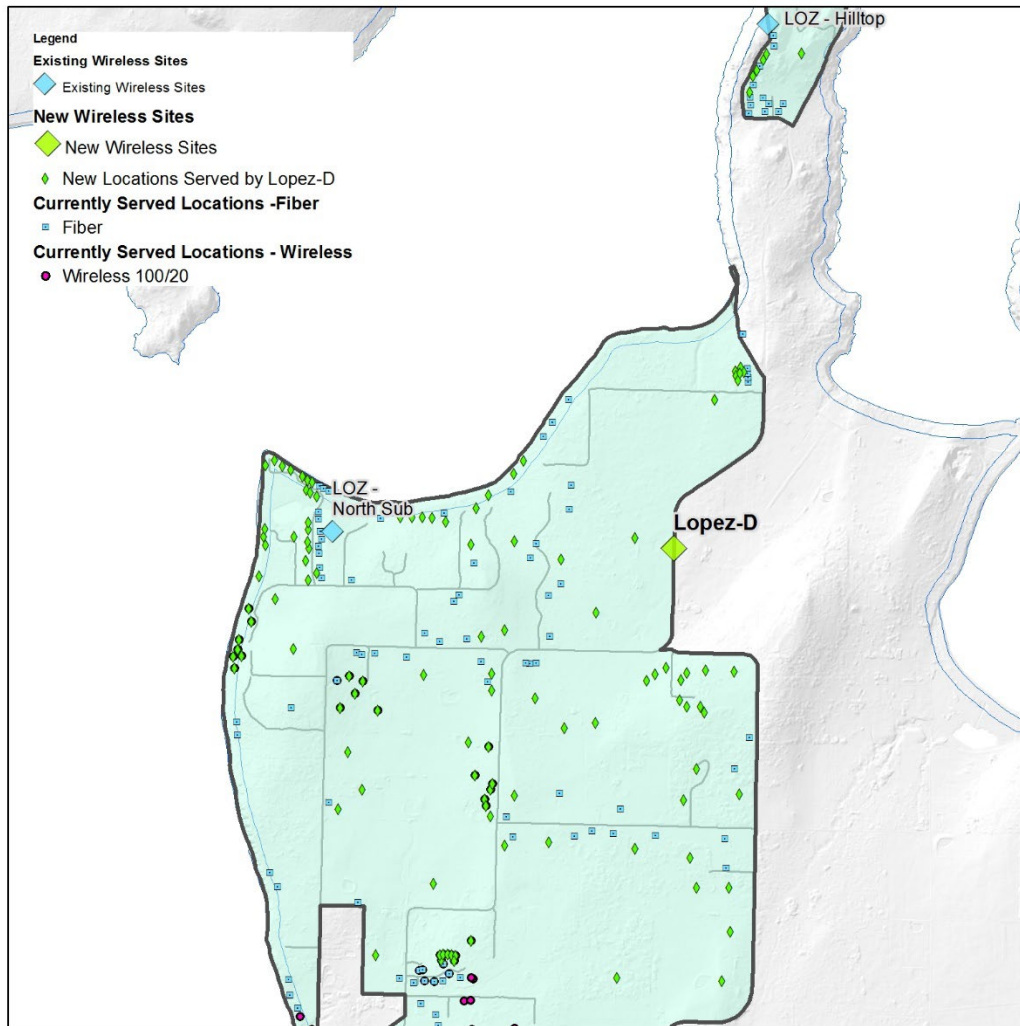
This site location assists in filling in the western valley of the west shoreline on central Lopez Island. The new site will provide wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. This site will provide required wireless service to **134 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

Lopez Site C –



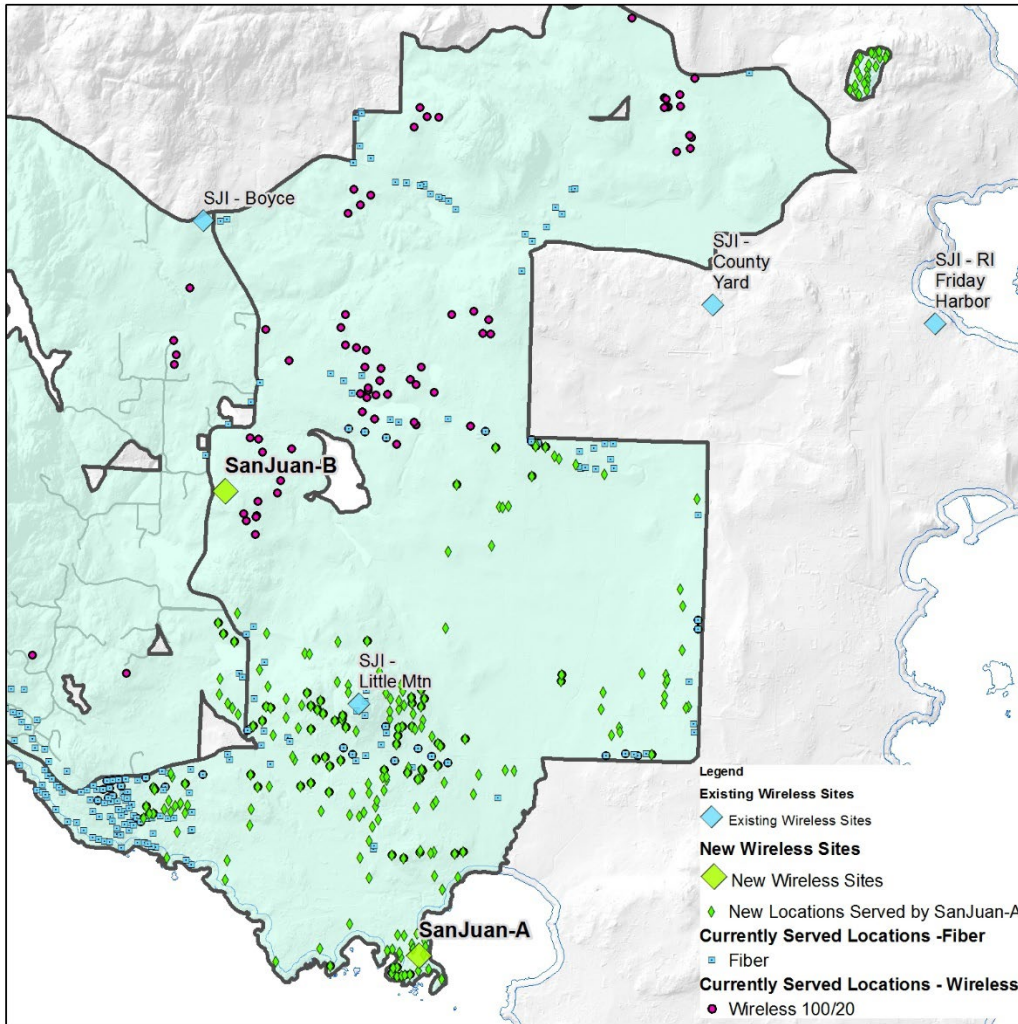
This site location assists in filling in the urban growth area and marine area known as Fisherman Bay on Lopez Island. The new site compliments one other site already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. With the existing site already upgraded, this additional site will provide required wireless service to **316 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

Lopez Site D –



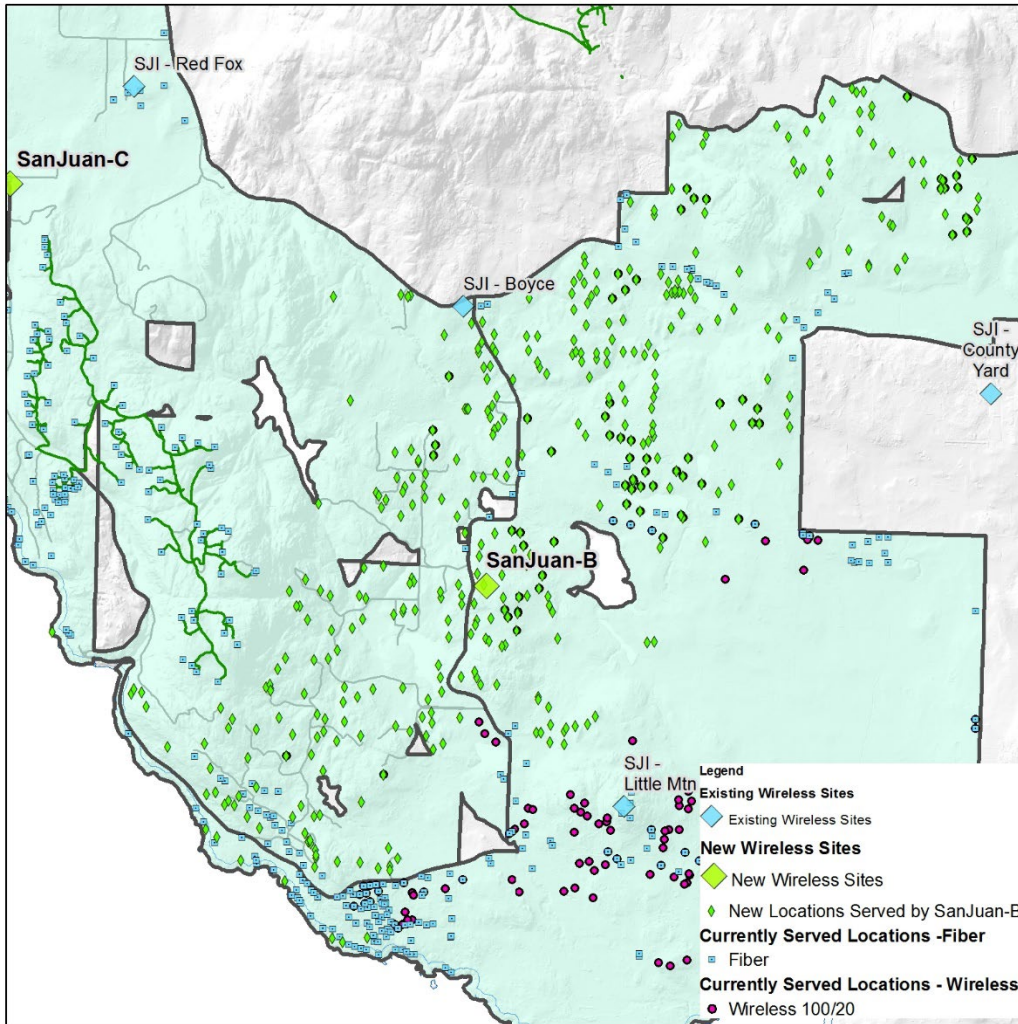
This site location covers the western portion of the northern valley on Lopez Island. The new site complements two other sites already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. Along with the planned upgrades to the existing sites, this site will provide required wireless service to **116 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

San Juan Site A –



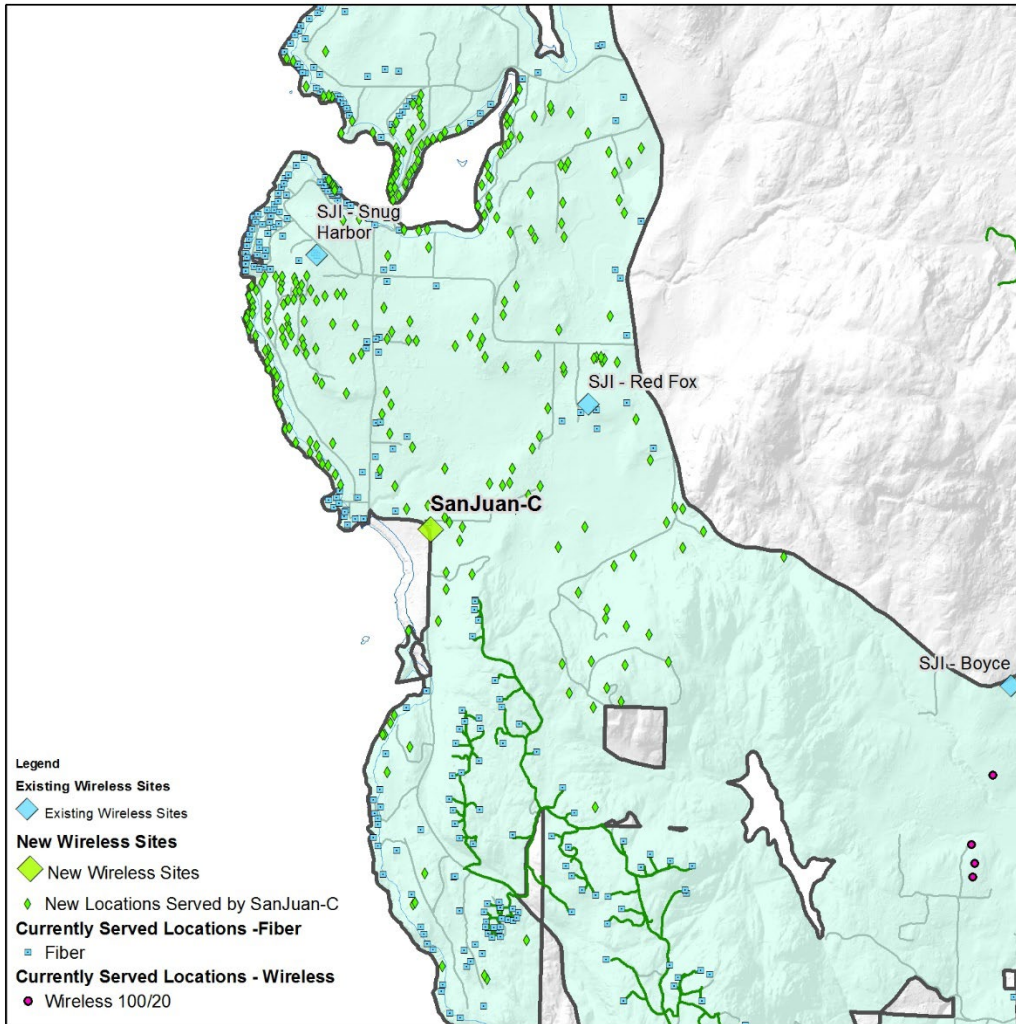
This site location assists in filling in the southern shoreline exposure on San Juan Island. The new site compliments one other southern site already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. Along with the planned upgrades to the existing site, this site will provide required wireless service to **234 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

San Juan Site B –



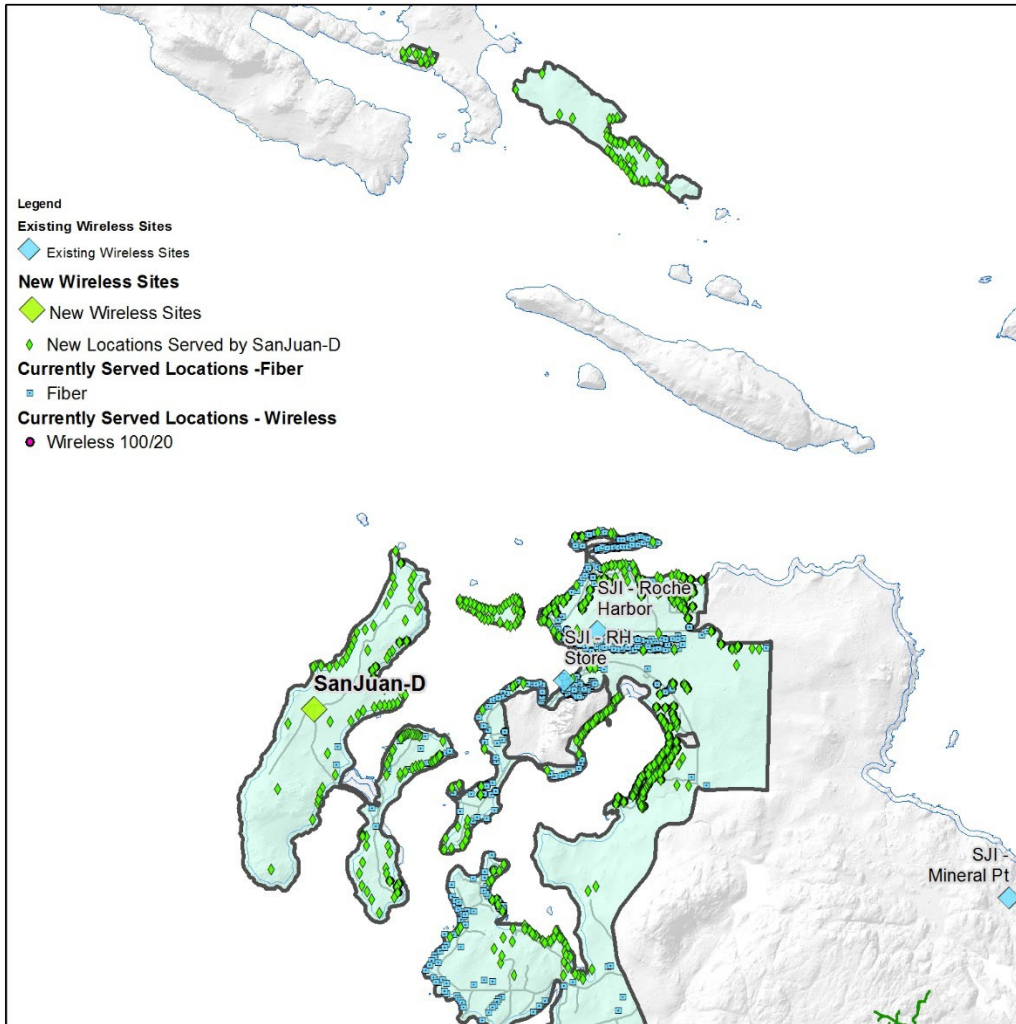
This site location provides a large portion of service for an interior area on San Juan Island. The new site compliments two other sites already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. Along with the planned upgrades to the existing sites, this site will provide required wireless service to **424 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

San Juan Site C –



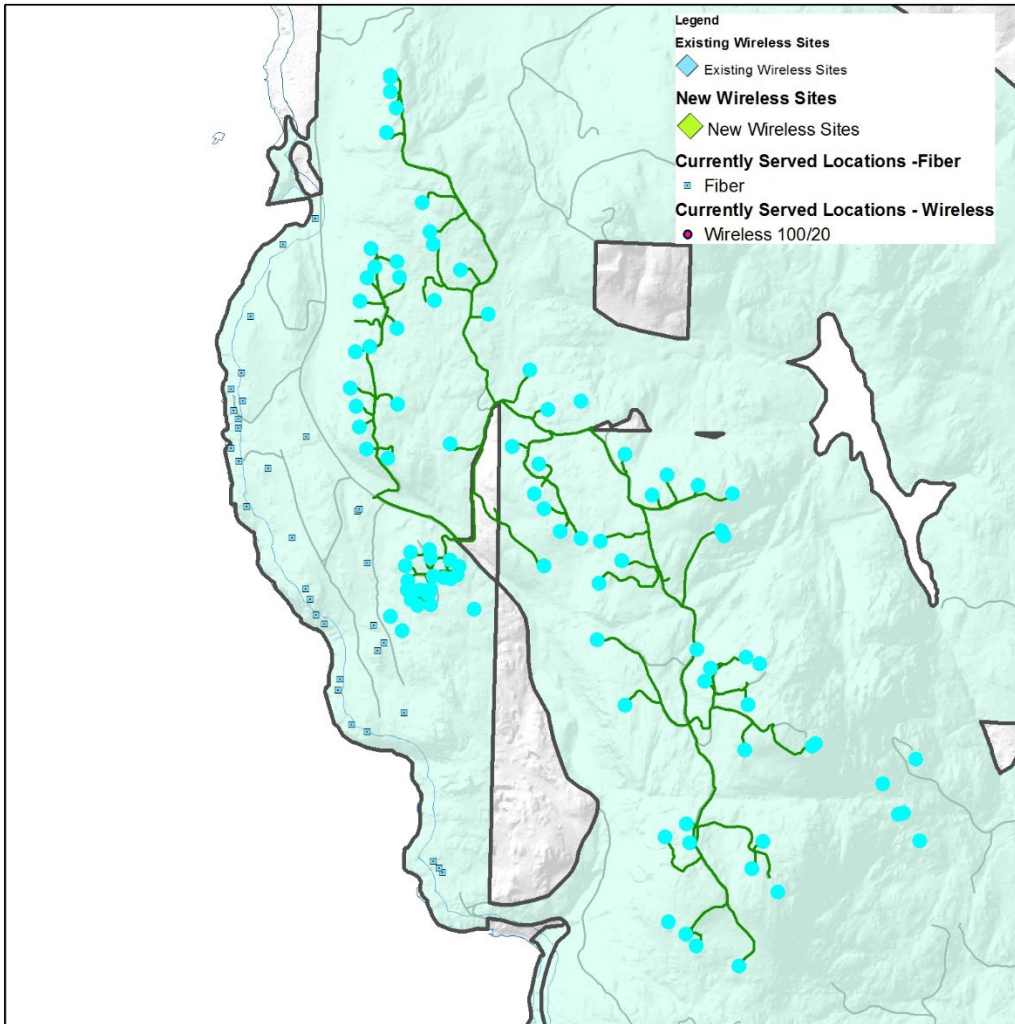
This site location will serve a westerly shoreline area of San Juan Island. The new site compliments two other sites already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. Along with the planned upgrades to the existing sites, this site will provide required wireless service to **282 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

San Juan Site D –



This site location will serve a northwesterly shoreline area of San Juan Island which includes a populous area of Roche Harbor and some remote island locations of Stuart Island. The new site compliments two other sites already providing wireless service in the area for a complete 100/20 option for all locations in the RDOF census block award. Along with the planned upgrades to the existing sites, this site will provide required wireless service to **484 locations** within the census block. The remaining locations have service availability by means of existing gigabit fiber to the home infrastructure from Rock Island.

ARPA Grant Award -



In addition to the new wireless sites, Rock Island is currently under way in deploying to **95 locations** on the westerly shoreline of San Juan Island by means of a fully awarded grant for fiber to the home. Construction has been underway since March of 2024 and will be completed by the grant deadline of October 2026. Since these locations are the most challenging for wireless coverage due to topography, it is a critical addition to meeting the RDOF commitment.

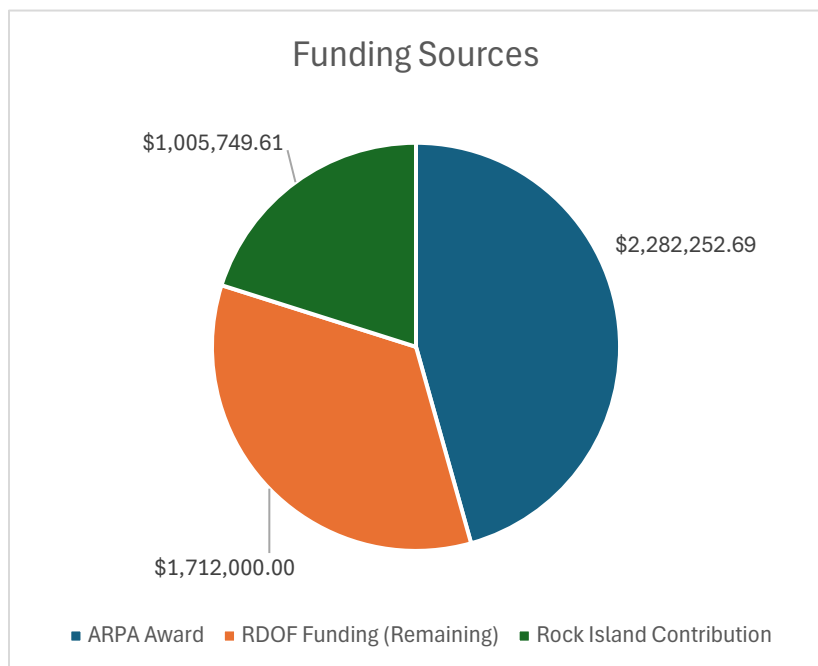
Project Budget

The remaining funding available in this RDOF award to CommNet does not fully fund the project scope necessary to deliver on the program milestones. However, Rock Island has already invested over \$6 Million in infrastructure in these locations using private funding and has allocated an additional \$1 Million towards the expansion of this project.

Careful modeling from our GIS system as well as deep familiarity with the cost of construction over the past 10 years and over 500 miles of fiber expansion in the county, Rock Island inserted those modeling costs into our budget for this extension of the project. Since Rock Island was awarded a grant for fiber deployment to some service locations within this award, the feasibility and affordability of the remaining deployment need is made possible given the low dollar amount awarded in the subsidy to CommNet through the reverse auction (RDOF).

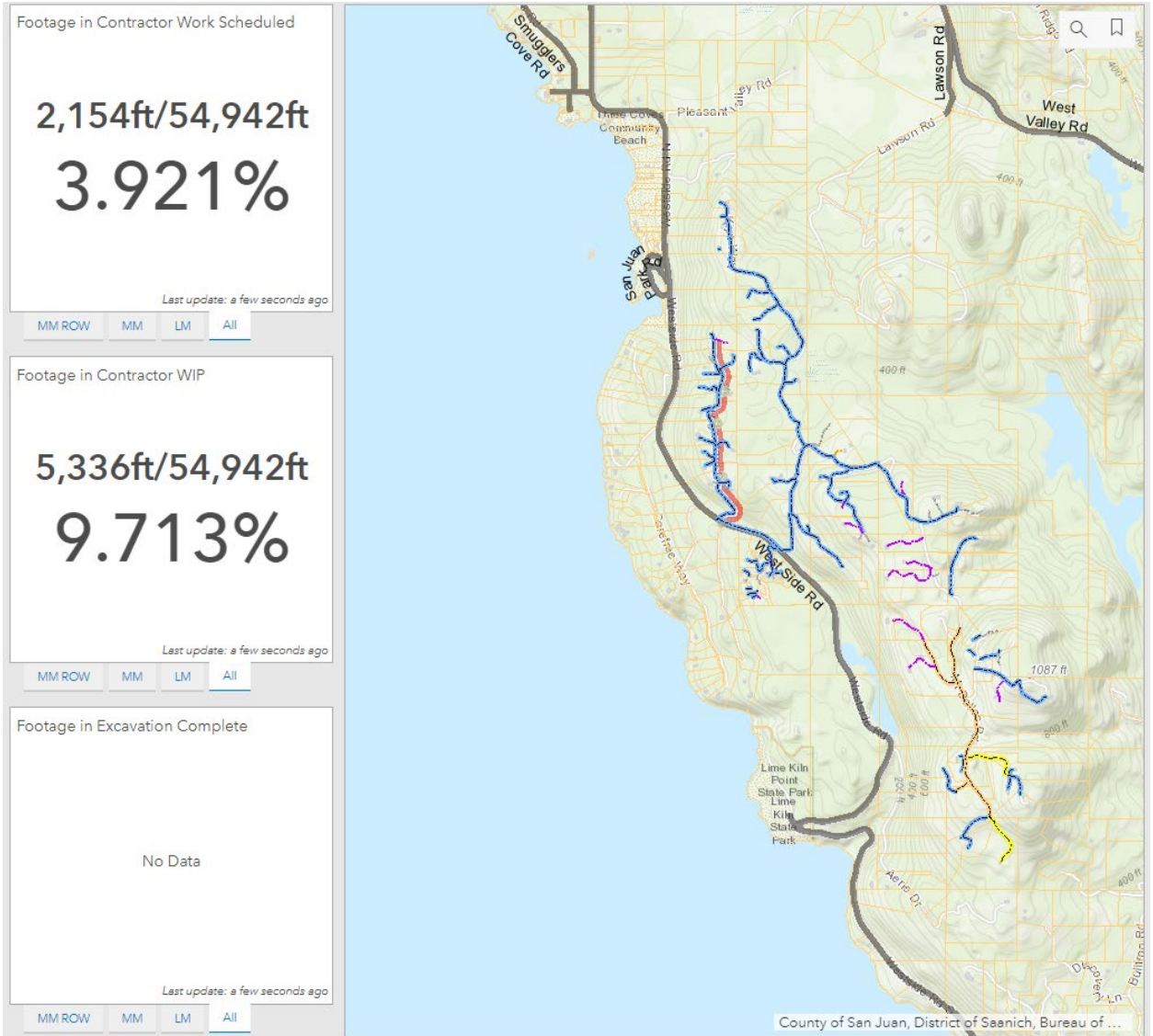
Type	Qty	UOM	Unit Budget	Totals
Project Materials	25,334	ft	4.55	\$ 115,269.70
Construction of Fiber	25,334	ft	\$ 36.40	\$ 922,157.60
Construct Wireless Site	7	ea	\$ 127,600.00	\$ 893,200.00
Fiber to the Home	320	Last Miles	\$ 9,450.00	\$ 3,024,000.00
Admin and Engineering	275	hrs	\$ 165.00	\$ 45,375.00
Total Project				\$ 5,000,002.30

The available funding from Rock Island's private lender available for this project is approx. \$1.4 Million. This guarantees full funding of the project budget, if the RDOF award is successfully transferred to Rock Island and Rock Island can successfully obtain a status as an ETC.



Project Schedule

ARPA Fiber Deployment – Progress 05/2024



Project: Rock Island RDOF Block Deployment

Island Network LLC

San Juan County, WA

Project start date: 3/31/2024

Milestone marker: 1 

Milestone description	Budget	Progress	Start	Days
Fiber Construction				
ARPA Fiber to the Home Deployment (West San Juan 320 locations)	\$ 3,024,000.00	15%	3/31/2024	310
Fiber Transport - San Juan Site A	\$ 155,614.10	0%	6/1/2027	40
Fiber Transport - San Juan Site B	\$ 186,736.91	0%	3/1/2026	45
Fiber Transport - San Juan Site D	\$ 363,099.56	0%	6/1/2027	60
Fiber Transport - Lopez Site A	\$ 103,742.73	0%	3/1/2025	20
Fiber Transport - Lopez Site C	\$ 228,234.01	0%	6/1/2027	85
Lopez Wireless Sites - New				
Lopez Wireless Site A Construction	\$ 111,650.00	0%	3/1/2025	30
Lopez Wireless Site B Construction	\$ 111,650.00	30%	8/1/2024	30
Lopez Wireless Site C Construction	\$ 111,650.00	0%	6/1/2027	30
Lopez Wireless Site D Construction	\$ 111,650.00	0%	5/1/2027	30
San Juan Wireless Sites - New				
San Juan Wireless Site A Construction	\$ 111,650.00	0%	6/1/2027	30
San Juan Wireless Site B Construction	\$ 111,650.00	0%	3/1/2026	30
San Juan Wireless Site C Construction	\$ 111,650.00	0%	10/1/2026	30
San Juan Wireless Site D Construction	\$ 111,650.00	0%	6/1/2027	30
Wireless Site Upgrades (Related to RDOF Area)				
SEO- Snug		10%	5/24/2025	30
SEO- Red Fox		10%	10/6/2025	30
SEO - Hilltop		10%	6/23/2026	30
SEO - Vista		100%	Complete	
SEO - Boyce		10%	6/23/2026	30
SEO - Little Mountain		100%	Complete	
SEO - Roche		100%	Complete	
SEO- Ben Nevis		10%	5/9/2027	30
SEO - Orcas West		100%	Complete	
SEO - Rum Runner		100%	Complete	
Budget Total	\$ 4,954,627.30			

*As of 05/24/2024