

January 16, 2018

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VIA EMAIL AND HAND DELIVERY
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Cynthia Walker
Division Director
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Notice of Planned Deployment of Broadband Passings by Charter Communications Operating SoCal I. LLC, Bright House Networks, LLC, and Falcon Cable Systems Company II, LP

Dear Director Walker:

Assembly Bill 1665 (2017) established a statutory right of first refusal (“ROFR”) over the deployment of certain broadband internet access facilities. The ROFR, codified at Public Utilities Code Section 281(f) and implemented by Resolution T-17590, may be exercised by any existing facilities-based broadband service provider (“existing provider”) to prevent the Commission from awarding California Advanced Services Fund (“CASF”) grant funding to a project that would deploy or upgrade broadband internet access facilities within an unserved area.¹

Charter Communications Operating SoCal I, LLC, Bright House Networks, LLC and Falcon Cable Systems Company II, LP (collectively “Charter”) hereby submits this letter in the spirit of the ROFR process to provide notice of the planned deployment of broadband passings to current video-only cable service areas in Monterey, Tulare, Kings and Modoc Counties within the areas designated for broadband deployment as listed as **Exhibit 1** during 2018 (the “Upgrade Area”).² **Exhibit 1** identifies each community, the approximate numbers of homes passed³ and the

¹ See § 281(f)(4)(A)(i) (“The commission shall annually offer an existing facility-based broadband provider the opportunity to demonstrate that it will deploy broadband or upgrade existing facilities to a delineated unserved area within 180 days.”). All future code citations are to the Public Utilities Code.

² Because January 15, 2018 was a state holiday, the due date for this letter was automatically extended to January 16, 2018 (as confirmed with CPUC Staff). As such, this letter is timely submitted.

³ Homes passed described in Exhibit 1 reflects an estimate of existing homes and businesses with current video-only cable services from Charter where the company has determined to upgrade in fulfillment of its merger commitment to provide broadband service. While it is possible and quite likely that Charter will extend its network, nothing herein shall be deemed to require Charter build to more locations than contemplated by its merger commitment.

responsible legal entity. Charter here also provides a list of all census blocks in the Upgrade Area as **Exhibit 2** and respectfully requests that the Commission deny applications for CASF funding to build in these Upgrade Areas. As detailed further below, Charter's plan to upgrade the Upgrade Area is in furtherance of Conditions 2(a) and 2(b) contained in D.16-05-007, the Commission's decision approving the transfer of control of Time Warner Cable Information Services (California) LLC ("TWCIS") and Bright House Networks Information Services (California), LLC ("BHN") to Charter Communications, Inc.

As a condition of exercising its ROFR, an existing provider typically must complete the broadband upgrades in the unserved area within 180 days unless a need for an extension is demonstrated.⁴ To exercise the ROFR for a given year, an existing provider must submit a ROFR demonstration letter to the Commission by January 15 of that year and complete the related broadband upgrades by July 15th.⁵ In addition, as recognized in an amendment to the CPUC CASF website on January 10, 2018, a provider may also submit a ROFR letter indicating an intent to build in a given area beyond the 180-day ROFR period and before the next ROFR process begins.⁶ For projects scheduled to be completed prior to July 15th of the ROFR period, once the Commission receives the ROFR letter, it shall not approve CASF funding for another broadband project in the same area.⁷ For projects scheduled to be completed in the second half of the calendar year, the submission of a letter does not bar the Commission from approving a grant to build in the same area. The upgrades noticed by this letter largely have construction completion dates in the second half of 2018 and thus do not fall squarely within the ROFR process. However, as a discussed below, in the spirit of the ROFR process, providers are encouraged to avoid those areas where build-out will occur in the second half of 2018 given that any funding award would be duplicative, waste limited public resources and would be subject to individual challenges.

Effective Right of First Refusal for Upgrades Required by D.16-05-007

The network upgrades for the Upgrade Area largely result from merger commitments made by Charter and memorialized in D.16-05-007. Specifically, Charter has committed to complete deployment of approximately 70,000 residential and commercial broadband passings to current video-only cable service areas in parts of Monterey, Tulare, Kings and Modoc County.⁸ Many of the upgrades were completed in 2017. The upgrades planned for completion in accordance with its merger commitments are the subject of this notice.

⁴ See § 281(f)(4)(A)(i) and (ii).

⁵ Res. T-17590 at 1, 8–9.

⁶ See www.cpuc.ca.gov/casf.

⁷ § 281(f)(4)(A)(ii).

⁸ See D.16-05-007, pp. 70-71, conditions 2(a) and 2(f).

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The D.16-05-007 upgrades must be completed by May 12, 2019.⁹ To meet the May 2019 deadline, Charter will continue its broadband deployment activities throughout 2018 with estimated construction completion dates planned to occur by the end of 2018, but no later than May 2019.

Given that the network upgrades at issue were ordered by the Commission, Charter requests that CASF applicants avoid the Upgrade Area in future applications for CASF funding without regard to the construction completion date. Charter submits that the Commission should deny CASF funding for applications related to the Upgrade Area. CASF applications for such projects would be duplicative and wasteful, and Charter would challenge such applications if not denied on an individual basis.¹⁰

Moreover, denial of applications for funding for deployment within the Upgrade Area is in the public interest. Given that the upgrades were a condition of approval for the transfer of control of TWCIS and BHN, Charter necessarily will complete the upgrades. The Commission and CASF applicants should therefore regard the ROFR established by this letter as extending to the entire ROFR Project Area and any other area where Charter will perform upgrades contemplated by D.16-05-007.

Please contact the undersigned counsel for Charter at jmctarnaghan@perkinscoie.com or 415-344-7007 if you have any questions.

Respectfully submitted,



James W. McTarnaghan
Counsel for Charter
Attachments

cc: Selena Huang
Tom Glegola
CASF Distribution List

⁹ See *id.* at 71. Charter notes that the underlying agreements provide for possible extensions where completion is delayed associated with a delay in the timely receipt of necessary governmental, regulatory and third-party permits, licenses and approvals, including but not limited to pole attachment permits, easements, rights of way access and utility make-ready requests and nothing herein constitutes a waiver of these provisions.

¹⁰ To the extent that CASF funding is granted to overbuild areas where Charter is otherwise required to upgrade under merger commitments, Charter would reasonably request that the Commission modify its obligations since the areas would no longer be underserved.

EXHIBIT 1

LIST OF COMMUNITIES

COMMUNITY	COUNTY	HOMES PASSED (APPROXIMATE)	LEGAL ENTITY
Avenal, CA	Kings	2,486	Bright House Networks, LLC
Aromas, CA	Monterey	580	CCO SoCal I
Las Lomas/Pajaro, CA	Monterey	1,283	CCO SoCal I
Soledad, CA	Monterey	4,502	CCO SoCal I
Chualar, CA	Monterey	281	CCO SoCal I
Greenfield, CA	Monterey	3,571	CCO SoCal I
King City, CA	Monterey	3,203	CCO SoCal I
Lemon Cove/Lind Cove, CA	Tulare	399	CCO SoCal I
Woodlake/Elderwood, CA	Tulare	2,668	CCO SoCal I
Orosi/Cutler/Sultana/Orange Cove, CA	Tulare	6,310	CCO SoCal I
Carmel Highlands, CA	Monterey	691	CCO SoCal I
Laguna Seca/Rancho Tierra Grande/ Bay Ridge/Laureles Grade Road, CA	Monterey	617	CCO SoCal I
Springville, CA	Tulare	1,662	CCO SoCal I
Three Rivers, CA	Tulare	1,494	CCO SoCal I
Camp Nelson, CA	Tulare	801	CCO SoCal I
Alturas, CA	Modoc	1,921	Falcon Cable Systems Company II, LP

EXHIBIT 2
LIST OF CENSUS BLOCKS IN UPGRADE AREA

<u>CENSUS BLOCK</u>	<u>CENSUS BLOCK</u>	<u>CENSUS BLOCK</u>	<u>CENSUS BLOCK</u>
060490003003089	060530113031236	060490001004032	060190065011035
060490001001032	060530148002009	060490001003040	060310017013002
060530132001015	060490001001002	061070001003172	060530146012006
060490003001705	060530146012008	060530146013000	060530116041077
060490003003075	061070001002121	061070006003012	061070001005000
060539900000039	060530101012010	060539900000038	061070027001010
061070007011022	060530111023065	060530107021034	061070006001011
060530116041075	060490001001006	060490001002001	060530111023155
060530112042017	061070027003024	060530116041076	060490001002018
060490001003041	060530113042039	061070007023003	060190065012011
060490003003090	060530102021009	060490001001069	060490001005010
061070001004015	060490001002055	061070027002103	060490001001053
061070027004019	060490001001043	060310017014027	061070001003176
060530101022011	061070027002110	061070027001112	061070002023059
060530101022000	060530112022022	061070001003125	061070002022113
060530101022018	060490001001016	060310017011065	061070027001129
060530116041049	060490001001035	060530146012005	061070001003096
060490001002029	060530101021010	060530112022021	060530111013020
060530111023137	060490003003072	061070006001013	061070002012004
060530116024000	060490001003052	061070007024014	061070002023050
060490003003987	061070001004054	060530148002027	060310017011086
060490001001031	060490003003085	060530113043013	060490001005060
061070027002055	060490001003038	060490001001028	060190065021011
061070007011016	060490003003076	061070001005006	060530101012027
060490001002053	060530113031051	060310017011131	060530113021003

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
061070002014013	060530111013046	060490001003010	060490001005028
061070014005002	061070001004052	060530112022006	061070001005014
060490001002034	060490001003006	060310017011083	060530111022021
060490001003013	060490001005029	061070006001016	061070007022028
061070006003013	060490001005068	060490001001015	060530112022014
061070001003184	061070002015009	061070001005019	060530112023013
060310017013012	060530112031019	061070027001045	060190065022021
060530111022041	061070027001064	060530111023153	061070007011010
061070027001068	060490001001039	061070001002106	060530132001091
060530113023023	061070007021013	061070007023023	060530111021020
060490001002005	061070007012034	060190065011019	061070002012014
060310017014016	061070001005035	060530116041086	060530113031057
060490001004028	060310017011127	061070007011006	061070007024019
060190065013000	061070007023005	060530111022034	061070002011001
061070007023000	061070003012010	060310017013000	060530113042018
061070007021019	061070001001095	060310017014012	060530113023012
060490001002022	061070002011029	060530113043004	060530112021015
060310017012000	060190065021031	061070001002127	061070003012031
061070002011015	061070006002000	060310017011113	061070001005043
061070006003011	061070006002000	061070027001214	060310017013058
061070002013023	060530112031001	060530112022010	060530113043008
060310017014018	060310017013020	061070014002023	060190065021049
061070002012019	061070002015004	060490001001056	060530111013027
061070007012036	060190065011032	060530111023104	060530116041043
061070001002082	060530111022028	061070001004022	061070007022014
060490001005048	060310017012021	060190065013014	060530111023142
061070027002116	060490001005075	061070002023038	060530111022001
060490001003045	060530113021033	061070014002014	060490001005015

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
061070002013032	061070002023058	060490001003000	060310017011101
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060530101022017	060490001002008	061070001005005	061070002014007
061070001003173	060310017013021	060310017013053	061070007012073
060490001003002	060190065012005	060310017014031	061070007024018
060490001001055	060530113043015	060530112042011	060530111022006
060530101012002	060190065021015	061070027002113	061070027003007
060530113023014	060310017013068	060530112023023	060530111013004
061070002013006	061070007011030	060310017014023	061070003012016
060530146012071	060190065021009	060530111022008	060530101022009
061070002014004	060530101022008	060530112022029	060530113041241
060530111022052	060530111013044	060530113043027	060530113031077
060530112021002	061070014005007	061070007012000	060530116023020
061070002023053	061070014005007	060310017014038	061070039021125
060490001002019	060530112022011	060310017013027	060490001003008
061070007012039	061070002014008	061070002021010	060190065021043
060190065022058	060530112031005	061070027001047	060310017011121
061070003012021	060530148002004	060190065021006	060490001001026
060490001005053	060530113042025	060190065022026	060530112023011
061070039021005	060190065021024	061070001005020	060310017014006
061070014002002	061070002012001	060310017014032	060530111013018
060490001003050	060530113041225	061070002023024	060530113041229
060530111021011	061070001004004	060190065013020	060490001002009
060530148002012	061070014002011	060190065021003	060530112032010
060530111023146	060490001004015	060490001005047	060530111022049
061070007024017	060190065011034	061070001001128	061070002013005
060530112041313	061070002011023	060530112042019	061070006003008
060530111022003	061070006004037	061070014005009	061070002023044

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
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061070007012071	060490001003032	060310017013018	060530112033013
061070002013020	061070027004000	060490001002037	061070001004146
061070014002032	060490001005079	061070003012000	061070006001005
060490001001013	060490001003025	061070007021014	060310017011119
060490001004012	060490001001068	061070002011011	061070027001049
060530112023004	060310017013060	060530102021006	060190065021029
060530111013026	060530116041071	060530112033014	061070001001088
060490001005012	060310017014014	060530111012007	061070003012006
061070007022031	061070014005037	060530112023029	061070002014005
061070002021006	061070001004056	060530113023027	061070002014023
060530111013021	060530113043009	060530112023022	060490001005070
060310017012004	061070002013027	061070007024008	060530113032008
061070014002005	060490001004013	060310017011132	061070039021121
061070027001205	060530101022006	061070002023062	060690002005009
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060530112021007	061070002013019	060490001005031	061070001002125
061070007024012	060490001004018	061070027001207	060530111013002
060690002005008	061070027001131	060530113021045	061070002013022
060530112032003	061070003012052	061070006004043	060530146012004
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060310017013025	060490001001073	060490001001062	060490001002004
061070001003177	060190065011037	060530113042047	060310017011074
060310017011045	060530101022004	060530113021036	061070027002091
061070001002109	061070006003018	060530113043000	061070027004020
061070002021020	060530113041232	060530111022022	061070014003006
061070001004089	060490001003016	061070002015003	061070007022004
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EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
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060490001005061	060530132001032	061070027004039	061070007023022
060490001004020	060310017012033	061070027004082	061070002013016
060530113023003	060530112041298	061070001002092	061070007012032
060530112023008	060310017011098	060310017011082	061070027001137
060530112041312	060530148002021	061070001004003	060530116041052
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061070027002096	060530112022012	060530113022005	061070001001116
061070006003005	060490001005055	060190065021047	061070007023010
060530113042024	060530113023002	060310017012019	060530113041234
060490001001014	060490001004016	060190065013002	060530111022038
061070014005003	060530113023025	060530113031073	060530101012012
060530101012008	060530112033011	061070002014025	060490001002043
060190065013016	060490001005074	060310017013067	060690002005000
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061070001004005	060190065013013	060530111022007	061070006004034
061070014002017	060310017013016	060490001001034	060530111022032
061070014002017	060530112033003	060310017013005	061070001003095
061070014002020	060190065013026	060190065013005	061070006001028
060490001003048	060530101011000	061070027001133	060310017014009
061070027003010	060310017014029	061070002021024	061070006002007

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
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061070014005001	060530111013043	061070001004114	061070001004002
061070006001001	060310017011073	060310017014028	060490001001051
061070002012020	060490001005001	060530101022013	060530112031008
060310017011117	060310017014004	061070002012017	061070007012003
060190065021033	061070002021011	060530112022013	060190065013019
060490001005066	060530101012003	061070027001132	061070027004227
060530132001017	060490001003049	060530111023103	061070001004008
061070002021017	060490001005009	060490001005007	060310017013017
060490001002045	061070003012020	061070003012030	060490001002050
061070007012053	061070001005047	061070007023009	061070002013002
061070014002018	060530113022006	061070027004080	060490001005049
060490001002000	060530113043018	060530113043031	060530111022000
061070002011035	060530113041242	061070027001046	060310017011078
061070027001140	061070003012022	060530113041228	060310017012012
060530112023002	061070027003006	060190065022040	061070002014020
060490001003003	061070007024003	060530113043030	061070027001139
060530116041080	061070007011011	061070007012041	060530112032001
060310017011109	060530113043021	060490001005035	061070007022027
060490001003021	060690002005002	061070007021010	061070002013004
060190065011018	061070007011019	061070027004026	061070006003029
060530116041074	061070006001017	061070003012014	060530112042003
060490001004019	060530112023033	060530148002008	061070007022032
061070006001027	061070006001007	060530101012004	061070007021021
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061070027003008	060310017011111	060690002005006	061070002013030
061070014002021	060190065021027	060310017014003	061070014005022

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
061070001005031	060310017014011	061070001004012	061070014005011
060190065021051	060490001004022	061070003012007	061070002013026
060530111021006	061070007023002	061070002013017	060190065021023
061070006002014	060530113042022	060190065011017	061070014005013
060530132001026	060310017012026	061070007012060	061070002022098
060530112031006	060190065022034	060310017011077	060530113043020
061070001004092	061070006002001	060310017013072	060190065022045
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060530113021022	061070027001143	060530112042010	060490001002038
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061070006004046	061070002021018	060310017014042	060530112022030
061070007024006	060530113031079	060190065021007	060310017013007
061070027003026	060530111013014	060190065011036	060530112022009
060530101012007	060530113041227	061070027004027	060530111012001
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061070001003168	060530112042013	060490001001029	060530111022033
060530111023150	061070002013011	061070014003004	060530112023003
060530112042009	061070006003022	060530111013008	061070003012036
061070002023023	060190065021002	060530112032000	061070027004022
060490001003001	060310017013033	060490001001041	060530111022029
061070002013001	061070006003001	061070007023018	061070002014012
060530111022020	061070014005016	061070014005025	060530112042005
060490001001009	060530101012016	060530111021015	060310017011134
060530116023003	061070007022030	061070027001065	060490001002002
060490001002027	060490001002014	061070002013033	061070039021000
061070007023015	061070003012008	060490001001052	061070007023007
060530111022046	060530111013013	060490001001065	060530112023024

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060310017013032	061070006003017	060190065013022	061070027004041
061070002023028	061070002023051	061070003012017	060530112032005
060490001005018	060530111013032	060530111012005	061070001003178
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060530146011007	060530112031016	061070027002064	061070027001039
060190065021044	060530113043026	060490001002051	060530113032001
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060310017013056	060310017013038	061070001002107	061070002011018
061070007012081	060530112031010	061070027003003	060530132001054
060690002005014	060530111023160	060310017011112	061070002013024
060490001001066	061070014002012	060530111023099	060530112042002
060190065022025	061070003012037	061070002011016	061070014003000
060530112021013	060530101011003	061070007012051	060310017011076
060190065012000	060530113032002	060530112033001	061070002011004
060690002005015	060490001002036	060190065013028	060190065021026
061070001001106	060530113021025	060310017013059	061070002011019
060490001003030	060190065012006	060310017012016	060530132001055
061070006002003	060530111023110	060530111022014	060530113041239
061070007022003	061070006001015	061070001001130	061070027003002
060310017014024	061070001002128	060530113023004	060310017011085
061070007021028	060530113023009	061070014002027	060490001005051
060190065013007	060530113043002	060490001001064	060310017014007
061070027004083	061070002022099	061070027001052	060190065011016
061070002021016	060530113031067	060530112021014	060190065012004
060310017011084	060490001002012	061070002021013	061070001004009
061070007011033	061070002023054	061070007012047	060530113021028
060190065012009	060310017013004	061070027001120	061070006002006
060310017013078	060530111022030	060190065021040	061070006001020

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060310017013011	060190065022036	060530111023112	060530113043025
060310017013047	060530148002011	060310017013045	060490001001038
060530113021044	061070002022092	060530107021047	060530113043016
060490001004031	061070006001000	060530113041266	061070007021023
060490001001067	061070006001000	061070007024009	061070007022011
061070006003007	061070001005009	060530116024001	060490001001008
061070007011031	060530113043017	061070014002030	060310017012010
060530113021016	060530112032004	060530111012004	061070002013034
060530111013007	060490001002047	060490001002020	061070007012062
061070006003004	060530148002022	061070027001202	060310017013052
060310017013030	060190065022017	061070007021024	061070027004014
061070001004016	061070001001152	060310017012017	060310017011120
060530111023156	061070007022022	061070007022015	060530113031059
061070007011021	060190065021000	061070002012009	061070001004051
061070014002004	060490001003019	061070014005031	060190065022030
060530113043006	061070001003088	060490001005011	060490001004014
061070002011007	060490001003005	060490001005037	060530146012009
060530112041314	061070027001124	061070002015013	060190065022031
060310017014045	060490001003042	061070002014014	060530112033007
060530146013006	061070007012038	060190065012010	061070003012025
060310017011096	060530111013041	060530111023100	060530111012003
060310017011090	061070007021027	060310017013046	061070001002093
061070006002009	060490001003047	061070027002063	060310017013006
060530112023001	060530111023140	061070002021021	061070001003097
061070001003187	060190065021041	061070002012006	061070003012013
060530112022018	060530111013003	060530111022031	060530111013000
061070002011030	060530148002006	061070002013015	060490001002048
060530113043014	060490001003054	061070002011013	060310017012013

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060530113021015	061070001002137	060530116041057	060190065012016
060530148002029	060530112032002	060530111023143	060530113021026
061070006002012	060530113021032	061070001001107	060530116041065
060530112021003	061070014002057	060490001005072	060490001001027
060190065013008	060530101022007	061070001001120	061070006003028
061070027004016	060490001005013	060530111013010	060530113022002
060530112041127	060530113031065	060310017012011	061070001005018
060530111022027	060530112022007	061070007012052	061070002015011
060310017014030	061070001002123	061070027001001	060190065022028
060310017012025	060490001005030	061070006001008	061070007021003
061070014005012	060310017013063	061070001005025	060530111013001
060490001001057	061070014003003	061070027001050	061070007022020
060530112023020	060310017014044	060530111022004	060310017011129
060530111021019	060310017011072	060490001005020	060530112023030
060310017012029	060530101022012	061070006003000	060190065012001
060310017011067	061070001005007	060530146012002	060530113023016
061070007022006	060190065022049	060530111012006	061070006001010
060490001005056	060310017013069	060530111021017	061070027001051
061070001004057	061070003012018	060310017012036	061070007011008
060530112023016	060530146011002	060310017014017	060310017011118
061070003012051	061070007022029	060530148002005	060530112033004
061070006003025	060190065021017	060490001001047	060530111023144
060310017011089	061070002011003	060530113043028	060490001004017
060190065021052	060530132001035	061070006001021	060490001003020
060490001005036	060530146013001	061070002023027	060530111023111
060530113042034	060490001001042	061070027003000	060190065021039
060530113043022	060190065021054	061070001004006	060530113041330
060530113022010	061070006003003	061070001005017	060190065022039

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060490001001054	060530111013031	061070027001211	060530132001063
060490001003055	061070001001103	060530113043023	060530112033012
060530113021046	060530146011000	061070007022018	060310017013024
060530111021016	061070001004007	060490001005052	060690002005007
061070001003101	060490001003022	061070001005027	061070014002015
060530112023000	060530113041237	060190065022029	060530146011005
061070006002008	060530148002003	061070027004037	060310017014046
061070039021002	061070007012076	060310017011107	061070027001122
060190065022020	060190065012002	060490001003056	061070002011008
060530101022015	061070006001022	060310017011063	060530148002010
060490001005022	061070006001012	060530111013005	060530101022019
061070001005004	060530112031009	061070002012012	061070001004001
061070002015016	060871104002014	060490001003012	061070002023025
060310017011088	061070001003126	061070027001014	060530111023147
061070007021002	060530113041223	061070014003001	060490001002021
061070007024015	061070027004031	060490001002026	061070014005004
060530111023138	060310017014008	060310017012038	060190065021042
061070002013013	061070007022010	061070007024010	060310017011106
060530112042006	060530111013033	060310017012018	061070027004033
060530116041072	061070001001109	061070001005045	060530112033008
061070002013021	060530113041244	061070007023019	061070001002094
060530101022003	061070001005051	060490001001048	060310017014040
060190065013011	060530111022047	060530113031064	061070001001108
060530101012009	060530113043011	060530111022039	060530111023151
060310017011099	061070001001110	060490001001007	061070002021053
060490001005059	060490001001081	060190065011025	060530111021010
060530111022053	061070007012057	061070027004032	061070007011020
061070002014001	060530132001031	060530112042004	061070007022002

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
061070002015012	060530116041064	060530101021006	060530111022005
061070001005024	061070002015007	060871103004011	060490001005077
060530113031235	061070002015007	061070002013025	060530111023101
060310017012032	060530101012000	060490001001037	061070007022021
060530113043007	060530112022025	060530112042020	060530113021009
060490001005034	060310017013009	061070006003014	060490001003053
060530112041301	060530112022031	060530113022007	060310017013057
060530111023164	061070014005026	060530111021014	061070001005003
060490001004026	060190065022047	060530113042017	060530113042020
060530113022001	060310017013075	060490001005026	061070002012005
060530113041238	060530113023019	060530112032007	060530111022040
061070027001126	061070007024005	061070002023052	060530113041331
061070002013018	061070002023035	060530112022015	060530146011001
061070006002013	060490001001072	060530111013040	061070002023046
061070001005013	060530113031075	061070006002015	060530112031002
061070014003002	061070001001115	060530113021013	061070001004088
060530113023018	060490001003028	060490001002041	061070002023057
060490001005067	060530101012011	060310017014022	060310017011116
060490003001703	061070027004018	061070027001115	060490001001071
061070002014000	061070007022017	061070007022016	060530111013028
061070007021009	060490001004006	060490001001010	060530112022004
060190065022044	060490001005017	060530113041233	061070002013014
060190065021036	060530148002001	060530112023015	061070002023041
061070027004012	060190065021037	060530113031068	060190065021038
060530113042023	060310017014034	060190065022043	060530112023009
061070007012042	061070007011005	061070006003002	060530148002013
060190065012014	061070002013028	060190065013023	061070006001002
061070002013012	061070007011029	061070007012083	061070006004044

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060190065011028	061070002014019	060530112021005	060190065022037
060530116041060	060310017012008	061070001002090	060310017012023
060490001001033	061070002013010	060190065022023	060490001005014
061070007011000	060530113043032	060530111012002	060530113023015
061070003012048	061070006003027	060530148002002	060190065011038
060530132001057	060690002005013	061070001005026	060530112042000
060310017011136	060530112041125	061070001003115	061070001003121
060530111011241	060490001003018	061070002021028	060530111021004
060530112041109	061070027001043	061070007023001	061070002012008
060310017014021	060530113021037	061070002021026	060530116041054
061070027003005	061070027003001	060310017012006	060530111011238
060490001003057	060190065012017	060530111013036	060490001004030
061070027003027	061070014005027	060530102021012	060530113023007
061070002011006	060530111013019	061070001004090	060530113042021
061070002014009	061070007023013	060310017011122	060490001004010
060310017013049	060530116023001	060490001001025	061070002022116
061070001002110	060530113023000	060530113023024	060530101021013
061070002014017	061070014005030	060530113042019	060310017013028
061070014002006	060490001002028	060190065012015	060530113023021
061070001001114	060310017011135	060490001004009	061070007022012
060530113031062	060310017014020	060530112042015	061070027002117
061070027001066	060310017012009	061070027004099	060530116041079
061070001003086	061070001005001	060530146012000	061070002023047
061070002013000	060530112021008	061070006002004	060530112022017
060190065011033	060490001002025	060530101012005	060310017013077
060490001005078	061070001005002	061070007012033	060310017014036
060190065022051	060530113041222	061070001003164	061070006001003
060530112023034	061070006003019	061070027003019	061070006001003

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
061070001005011	061070027003004	061070007021015	061070027001136
061070007011003	060530132001059	060530112042001	060530111013022
061070007022008	060310017014041	061070002011021	060530148002023
060530116041055	060530113041245	061070002014016	060530113021042
061070001004010	061070006002010	061070007011001	061070002013008
061070014002001	060310017011087	061070007021011	060490001001060
060310017011091	061070007012079	061070027004015	061070007011034
060530113021023	060530101021007	061070002014022	061070002011009
060530116041078	060190065012013	061070001001111	061070006002016
060310017014035	060190065022050	060530112022026	060530112023032
061070007022000	061070003012012	061070027004098	060310017014019
061070002021009	061070027003018	060530111013016	060530111022050
060190065021053	061070001005052	060310017012022	061070006003021
061070007023008	061070007011023	061070007023012	060190065013001
060190065021004	060490001003026	060490001005041	060530113043001
061070039021123	060530113022011	061070027001135	061070007022026
060490001005008	061070002014006	061070002012010	061070039021132
060490001005046	061070003012023	060310017012014	060490001003015
060190065021035	061070014005036	061070001002122	061070002022096
061070007021005	060190065013018	060310017012015	060190065021034
060530107021046	060190065011029	061070007012004	060530112032006
061070002021029	061070014005024	061070006004025	060530111012000
060530113021040	060530101012006	060490001005071	060490001005042
060530111013006	061070014002013	060490001005038	060190065021008
061070027001042	060190065012007	061070007024000	060530116023002
061070001004044	061070014005005	061070014002029	061070006001004
061070003012045	061070002015006	060530111022010	060490001002017
061070003012050	060190065021050	060530146011003	060190065021022

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060310017014037	061070001005039	061070002013007	060190065021005
061070002015008	061070001005032	061070002021008	061070006001026
061070002015008	061070027001206	060530113042029	060530113043003
061070001003128	061070039021122	061070001003182	060530113042035
061070007022005	060530112033010	060490001005062	061070002023019
060530112022019	060530111022025	060310017013054	060490001001036
061070007012001	061070003012038	061070002021025	060190065021014
061070027002068	060530111013030	061070007012065	061070001001105
061070001004014	060530112031007	061070039021130	061070027003012
060310017011093	061070002023061	060530113022009	060310017011105
060310017013043	061070014002026	061070001003169	060310017013031
060490001002052	061070027001141	060490001005033	060310017012034
060490001001040	060490001003035	060490001003007	060310017014000
060310017015488	061070002014003	061070002022100	061070003012033
060190065022018	061070002011026	061070002011024	060530111013038
060310017013076	061070007022001	060490001005025	060530113042027
060190065022016	060530111021007	060490001001049	060530102023015
060490001002003	060530113043010	060490001001044	060530112033006
060530111023097	061070007021007	060190065022054	060530111013039
060310017014025	060310017014039	060530101022014	061070006001025
060310017013036	060310017013040	060310017011071	061070003012028
061070002023063	060530112031018	061070007023004	061070002012007
061070002023048	060310017014002	060310017011124	060310017013048
060690002005010	060490001002024	061070001005036	060310017011125
060190065013009	060190065021021	061070002014021	060310017013050
060190065022011	060530113021041	060490001001063	061070007011018
060530146013004	060190065022042	060490001002010	061070002015010
061070027001117	061070002023055	060310017013026	061070002015010

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060530111013034	061070001005015	060190065022015	061070007021020
060530112033002	061070007024016	061070001003191	061070007022024
060490001003037	060190065022033	060530111022018	061070007024004
061070001002112	061070027003023	061070007011013	060530116041059
061070002012016	060530113042032	061070001004055	060530116023007
060530112033005	060530132001056	061070007024011	060530112022005
061070002011010	060310017011114	061070027001134	060530112023014
060310017013022	060530112032011	060490001004007	060530112031017
061070027001061	060530111022012	060530146012007	061070002011033
060530141073120	060310017012001	061070002021005	061070001004091
060310017011130	060490001002023	061070001001118	061070001005008
060530112023028	060530112022032	060530111013029	061070027001210
061070027001203	060190065013006	061070002023018	061070001001104
060190065021013	060530111011048	060530111023102	061070001001117
060530112042007	060310017012030	060530111022035	061070002023017
060490001005054	061070027002107	060490001001018	060530111021018
060530113043034	060190065011060	060490001005004	060530111021009
060530111021008	060490001001075	060490001002007	060530111022019
060530116041082	061070014002022	060490001002039	060530112021010
060530113021008	061070003012027	060490001002040	061070027002067
061070006003009	060530111021012	060490001002049	061070001005022
061070002023060	060310017014026	060190065013003	060190065022048
060310017013065	061070001005023	060530112042008	060490003003095
061070002021022	060310017012002	061070007012035	060490001002046
061070006004027	060530113032010	060530113022008	060490001002044
061070001002138	060530112032009	061070003012039	060490001004008
061070007012072	060490001003011	061070003012029	060490001005044
061070007012056	060530111011239	061070007021026	060490001005023

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060190065013012	060490001001030	060530113041192	060530113042026
061070007011007	060190065022038	061070001005012	060530113031323
061070006002011	060490001005058	061070002011000	061070014002008
060530113022003	060490001005003	061070027001057	061070007012014
061070003012032	060490001005065	061070027001067	060310017012028
061070003012047	060190065013010	061070002021023	060310017013035
060530113042036	060190065011026	060530101012028	060530111013009
060530113043005	061070006003016	061070002014024	060530116023019
061070014002003	061070006003024	061070001002113	060530112031011
061070014002024	060530113021035	061070002022097	060530112032008
061070007022013	060530113023008	060530111022044	061070027001125
060310017011097	061070039021126	060530111022017	061070027004025
060310017013042	061070027004023	061070027002066	061070027004036
060310017013039	061070007012074	060490001001046	061070027004028
061070002015017	061070007021017	060490001001045	061070027003015
060530112023006	061070007021001	060190065021010	061070001005034
060530112023027	061070007023021	060490001002006	061070001005021
060530112021004	060310017011108	060490001003024	060530113042030
060530112023005	060310017012007	060490001003046	060530101022010
061070001004000	060310017013015	060490001005005	061070001003166
061070002011012	060310017013074	060190065021019	061070027001041
060530113042031	060530112023026	060190065021016	060530132001034
060530132001060	060530112031013	060530115021000	061070002022115
061070002021027	060530112031015	060530113032003	060530111022045
061070001002083	060530112032012	061070006003026	060530111023098
061070002023036	061070014005014	060530113021027	060530112021012
060530112021009	061070027004038	060530113021031	061070006004045
060490001001082	060530113041235	060530113021012	060490001001076

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060490001005019	061070027003021	060310017013051	060490001004021
060190065022019	060530146011006	060310017013044	060490001005032
060490001003023	060530101021004	060530116023000	060490001005063
060490001003051	061070002014015	061070002011027	060490001005016
060190065013004	061070002014010	060530112021000	060530113023011
060190065013015	061070002021015	060530115021012	060530113021024
061070006004035	061070001001129	061070002012013	061070007021018
061070007011009	060530111013035	061070001003092	060310017014033
061070007012002	060530111021003	061070001004011	060310017013034
060530113023005	060530111022051	061070001005041	060310017014001
061070003012035	060530111022023	061070001005028	061070027004030
061070003012034	061070002023021	060530113041219	061070002012018
061070003012011	060190065021012	060530132001058	061070001004145
061070007021025	060190065021001	061070027003014	061070001004013
061070007023020	060490001002054	061070027003009	060530113041221
060310017013064	060490001003009	061070027001063	061070027003013
060530112031012	060490001005021	061070027002111	061070027003011
060530112022028	060490001005076	061070027001013	060530101012013
061070002012002	060310017015479	061070001003102	061070002015018
060530112041300	061070007011032	061070001003185	061070002021014
061070014005008	061070003012005	061070002013003	060530111013015
061070027004228	061070003012015	061070002014002	060530111013024
061070002012003	061070014002000	060530111022048	060530111023161
061070001003193	061070007023014	060530111013023	060530111023163
061070001005037	060310017014005	060530111021000	061070027002112
061070001005038	060310017011102	060530111023162	060490001001061
060530132001062	060310017011103	060490003003094	060490001001017
061070027003025	060310017012024	060490001002011	060190065021046

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060190065022052	060530112023012	060190065012003	061070002023042
060490001004011	060530112023025	060530112042014	060530111021013
060490001005000	061070002013009	060530113021047	060690002005011
060190065012012	060530112033009	061070006001023	060490001003044
060190065013024	061070014005023	060530113043024	060490001003029
060190065011064	060530113041243	060530113043019	060490001005027
060530113032004	061070002011032	061070003012019	060190065012008
060530113032006	061070027003022	061070007021006	061070006003010
060530113032007	060530101022005	061070007022025	060530112041126
061070007011017	061070027001138	060310017011126	061070007011024
060530113021034	061070001003127	060310017013070	060530113023020
060530113022004	061070002015000	060310017014010	060530113023026
060530113023013	060530111021001	060530116041058	061070039021124
061070001003190	060530111022013	060530112023007	061070014002010
061070007021000	060530112021006	060530112023021	061070014002009
061070007021022	061070027002109	060530112031020	061070007012043
061070007021004	060490001001020	060530112032013	061070007023017
061070007022007	060190065021030	061070002011014	060310017011110
060310017011104	060190065021045	061070001005030	060310017013010
060310017011075	060490001003017	061070001005040	061070014005010
060310017011128	060490001003014	061070027003017	061070001004058
060310017012035	060490001004024	061070027001059	061070001005029
060310017013013	060490001005045	061070027001044	060530101022016
060310017013001	060490001005069	060530146011008	060530102021008
060310017013029	060490001005024	060530146012003	061070002015014
060310017013062	060490001005002	061070002021004	060490001001070
060530112023017	060490001005073	061070002021012	060190065021048
060530112022027	060190065011024	061070002022114	060490001003027

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060490001003031	061070002021007	060310017013014	061070006001024
060490001004029	061070002023049	060530101012001	060530113021021
060490001005057	061070002023026	061070027004097	060530113043033
060490001005039	060530111021002	060530113041231	061070027004024
060190065013027	060530111022015	061070001005042	061070014002025
060190065021020	060530111022024	061070001005046	061070014002025
060190065021025	060530111023157	061070001005044	060310017014043
061070006003023	061070027002059	061070002011034	060310017012039
061070007011012	060490001001058	061070002012000	060310017013071
060530113021038	060490001001077	061070002012011	060530111013011
060530113021043	060490001002016	061070027001204	060530111013012
060530113022000	060530148002007	060530146012010	060530116041053
060530113023017	061070006003015	061070002014011	061070027004035
061070039021127	061070006003006	061070002015005	061070001004053
061070003012026	061070006004036	061070002015015	061070027002108
061070014002028	061070006002005	060530111013017	060530113041230
060530146012001	060530113021002	060530111013042	061070002011005
060310017012020	061070006001018	060530111023159	060530102023001
060310017013023	061070039021004	060190065022041	061070027003016
060530116023006	060530113031061	060190065022027	061070027001004
060530116023005	061070014002016	060490001002013	061070027002118
060530112023018	061070007012058	060490001003039	061070001003162
061070014005006	061070007022019	060490001005064	061070002014018
061070002011020	061070007023006	060490001005006	060530112021011
061070002011028	061070007024001	060190065013017	061070001002091
061070002011002	060310017011123	061070007012082	061070002023020
061070002011017	060310017012031	061070007011027	061070002023037
060530111011018	060310017012037	060530112041107	061070027002065

EXHIBIT 2: LIST OF CENSUS BLOCKS IN UPGRADE AREA (Continued)

CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK	CENSUS BLOCK
060530141073122	060530111021005	061070002011031	061070007012040
060490001001050	060530111023152	061070002011022	060310017014015
060190065022055	060530111023145	061070002012015	060310017011066
060490001003043	060530112021001	061070027004040	060310017011081
060490001003033	061070007023016	061070027001123	060310017011133
060190065013025	060530113031060	060530146011004	060310017013003
060530113032009	060490001004023	060530101021005	060310017013037
061070007012078	060490001004027	061070002015001	060310017014013
061070006004024	060490001005050	061070002015001	060530112031003
061070006001009	060190065021018	060530111013037	061070014005000
060530113023010	060530148002028	060530111023141	061070027004017
061070006001014	060530113031056	061070007022009	061070027001142
061070007024013	060530112042016	060490001001024	061070001002111
060310017011100	060530113021029	060190065021032	061070027001128
060310017012027	060530113021039	060190065022046	061070001003119
060530116041073	061070006001006	060490001002042	
060530112022020	061070006002002	060490001003036	
060530107021027	061070003012004	060490001005040	
061070014005015	061070007022023	060490001005043	
061070002011025	060310017011064	060190065021028	
061070027003020	060310017013066	060530115021010	
060530101021012	060530116041056	060530112042012	
060530101021008	060530112023010	061070007011025	
061070027001130	060530112031004	060530113021030	
060530132001061	061070002013031	061070006001019	
061070001002108	061070014005021	061070039021001	
061070001002126	061070001005033	061070014002007	
061070002022101	060530113041240	060530146013005	