

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of Salish
Networks for Designation as an Eligible
Telecommunications Carrier

)
) DOCKET NO. UT-144138
)
) AMENDED PETITION OF SALISH
) NETWORKS, INC. FOR
) CERTIFICATION AS AN ELIGIBLE
) TELECOMMUNICATIONS CARRIER
)
)

Salish Networks, Inc. (Salish) respectfully submits this Amended Petition to the Washington Utilities and Transportation Commission (Commission) for designation as an Eligible Telecommunications Company (ETC) under 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201, and WAC Chapter 480-123. Salish serves customers both on and off the Tulalip Reservation and seeks support from the federal Universal Service Fund (“USF”) to aid in providing advanced telecommunications services in high-cost areas and to low-income consumers.

I. CONTACTS FOR PETITIONER

The contacts for Petitioner in this docket are as follows:

Charles L. Best
Attorney at Law
1631 NE Broadway #538
Portland, OR 97232
Telephone: (503) 287-7160
Facsimile: (503) 287-7160
E-mail: charlesbestlaw@q.com

Travis Hill
Salish Networks, Inc.
2601 88th St. NE
Tulalip, WA 98271
Telephone: (360) 716-5128
Facsimile: (360) 716-0133
E-mail: thill@salishnetworks.com

II. BACKGROUND

Salish is a registered competitive local exchange company (CLEC) authorized by the Commission in UT-130542 to provide telecommunications services in Washington. As a Tulalip tribal enterprise, Salish is currently providing service to customers both on and off the Tulalip Reservation. The company has built a fiber-optic network with self-healing architecture that provides state of the art telecommunications services and advanced Internet based technology to portions of the reservation. Salish plans to expand its network to serve customers who are not on the current fiber network using network elements purchased from Frontier Communications. The company adopted an interconnection agreement with Frontier, which was approved by the Commission in UT-133021. Designation of Salish as an ETC is in the public interest as it will advance the purposes of universal service found in 47 U.S.C. § 254, introduce a new competitor to the designated exchanges, foster access to basic telephone service, advanced telecommunications and information technology in all regions of the Tulalip Reservation.

III. PETITION REQUIREMENTS

WAC 480-123-030 sets forth the requirements for a Petition for designation as an ETC.

Salish presents the following information in compliance with those requirements:

1(a) A description of the area or areas for which designation is sought.

Salish is seeking universal service support for services it will provide both on and off the Tulalip Reservation. Specifically, the company seeks designation for the entire geographic area within the following Exchanges:

- Marysville
- Arlington
- Everett
- Stanwood
- Granite Falls

1(b) A statement that the carrier will offer the services supported by federal universal service support mechanisms throughout the area for which it seeks designation, either using its own facilities or a combination of its own facilities and resale of another carrier's services.

Salish will offer all supported services throughout the areas set forth above. Salish currently provides these services to existing customers through its extensive infrastructure on the Tulalip Reservation and in the neighboring area. As set out in 47 CFR Section 54.101, these services include:

- Voice grade access to the public switched network—Salish's fiber network is currently connected to the public switched network through interconnection with Frontier Communications and provides voice telephony services to its customers

giving them the ability to reach others throughout tribal lands and the rest of the world.

- Minutes of use for local service provided at no additional charge to end users -- Salish will provide various calling plans to customers; all of which offer free, unlimited local usage;
- Dual tone multi-frequency signaling – Salish’s network provides this or its functional equivalent;
- Single party service – The company provides only single party service to its customers;
- Access to emergency service providers-- Direct 911 and enhanced 911 services are provided to all customers through dedicated T1 connectivity to the local public-safety answering point;
- Access to operator services -- These services are currently provided through a contract with National Directory Assistance;
- Access to interexchange services -- Salish provides these service through a presence in Everett Tandem (CLLI EVRTWAXA03T) allowing customers the ability to make and receive intrastate, interstate, and international long distance calls using the provider of their choice;
- Access to Directory Assistance – This service will be provided to customers via the agreement with National Directory Assistance;

- Toll limitations for qualifying low income customers – Salish’s billing system features functionality allowing toll blocking and other toll control services to qualifying low income customers;

To support the voice and data services it provides throughout the Reservation and local community Salish has installed over forty miles of high-count fiber-optic and copper cabling. As such, Salish has invested heavily in the latest technology in the proposed service areas and plans to expand these investments. Salish has purchased and will install additional data/service cabinets to extend the company’s service footprint and offerings. These cabinets will allow Salish to provide increased data transmission rates, through asymmetric digital subscriber line broadband Internet access (ADSL2+), to the vast majority of homes on the Tulalip Reservation. Additionally, it will provide very-high-bit-rate digital subscriber line (VDSL) to select high-density location in the surrounding area. Further, in order to reach homes and businesses that are not currently connected directly to its network, Salish will lease copper cabling through the company’s interconnection agreement with Frontier Communications.

1(c) A description of how the carrier will provide each supported service.

Salish will provide the supported services set forth above through a mixture of Salish owned and operated fiber-optic, coaxial, and copper infrastructure in addition to ADSL2+ and VDSL equipment representing the latest in telecommunications technology. The company will also lease copper cabling to provide supported services. In addition, Salish has purchased a carrier grade Class 5 integrated soft switch capable of delivering supported services in a single site deployment for up to 100,000 subscribers. This switch is rated to provide 99.999% uptime

delivering reliability and redundancy which will ensure high quality service to the company's customers. This switch also allows for easy repairs and upgrades.

1(d) A substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers.

During the first two years of federal support, Salish plans to invest in upgrading its existing facilities. The company will also look to expand its network throughout the Tulalip Reservation and in locations off the Reservation. This expansion will include the deployment of additional fiber-optic and copper infrastructure on the Reservation and in the surrounding area. Salish has already purchased and will install six digital subscriber line access multiplexer (DSLAM) cabinets and other technologies to broaden the reach of Salish's voice and data services. The company anticipates purchasing another three DSLAM cabinets before the end of the year and four more over the next two years to complete its full build out on tribal land. Salish also expects to add three additional DSLAM cabinets in the next two years to complete its off-reservation network in Marysville, Washington.

Salish will prioritize the expansion of basic and enhanced telecommunication and data services to underserved and low-income locations of the Tulalip Reservation and local communities. As is common on many Tribal Reservations nationwide, there are significant interior areas of the Tulalip Reservations that are underserved. Salish is committed to continue deployment of the required infrastructure to meet the growing need for adequate telephone and Internet services. These planned expenditures will ensure that Reservation residents are provided access to basic telephone services using the latest telecommunications technology.

1(e) A statement that the carrier will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers not receiving discounts.

Salish is committed to providing service to all of its customers including those of limited means. The company has outlined a strategic marketing plan that will ensure that programs supported by the Universal Service mechanism are made publically known. To accomplish this goal Salish will:

- Advertise in the Tulalip Tribes Local Newsletter, which is provided and available free to the public throughout the Tulalip Reservation in government buildings and commercial properties;
- Advertise on Channel 99, which is the local Community Access Channel owned and operated by Tulalip Broadband and broadcast on the Reservation Cable system as part of the basic cable TV package;
- Advertise in the Marysville Globe, a small local newspaper that targets the business and residential members of Marysville, Washington and the surrounding communities; and
- Advertise in the Everett Herald, a regional newspaper that services the greater Arlington, Marysville and Everett area.

1(g) Information that demonstrates its ability to remain functional in emergency situations including a description of how it complies with WAC 480-120-411.

Salish has implemented a very robust approach to disaster preparation and emergency operation that give it the ability to remain functional in emergency situations and complies with the requirements of WAC 480-120-411.

For example, the company engages in preventative maintenance to ensure that all its facilities are in safe and serviceable condition. We have installed a fault-tolerant fiber-optic ring within which all critical systems and service locations are fed by divergent paths with self-healing failover capabilities. These capabilities help ensure system availability for customers. Salish strictly maintains the proper calibration and the repair standards recommended by the manufacturer of its equipment in addition to physically monitoring its network which includes driving the length of its cabling infrastructure and visually inspecting the system on a monthly basis. In addition, during periods of inclement weather the company visually inspects its cable after each windstorm, snow fall, or other major weather event. Should damage to the system occur, Salish maintains an “emergency repair kit” in its warehouse that is sufficient to repair multiple cable and equipment failures. Furthermore, in order to promptly repair broken or damaged equipment, the company has multiple types of test and repair tools on-hand for troubleshooting and repairing cabling systems, circuits and equipment. These preparations and precautions allow Salish to immediately correct hazardous conditions endangering persons, property, or the continuity of service when emergencies occur and to promptly correct transmission problems when they are identified.

Additionally, Salish has installed test apparatus at its facilities to determine the operating

characteristics of its network systems. Within Salish's Central Office is a built in Service Assurance Server that relays Voice Quality statistics and trace call features that measure the performance of the network. This information is relayed to Salish's Network Operations Center where technicians monitor the information 24-7 and are immediately alerted to network trouble. Salish also utilizes Solarwinds equipment to monitor IP connectivity. This equipment generates a variety of log files which are monitored by Salish technicians and also generates alarms to alert staff on duty of any problems with the IP network. The company also uses a Firebird FST-2310 test box for installing and troubleshooting T1 and DS3 circuits provided to our customers and other carriers. For fiber end to end connectivity testing, the company employs JDSU OLS-55 and JDSU OLS-35 equipment.

Salish has an extensive power backup system with multiple layers of redundancy to ensure that power outages do not lead to service interruptions. Salish's Data Center can utilize multiple power options. The Snohomish County Public Utility District provides primary power to the facility. Incoming power is sent through a series of conditioners to regulate and filter any spikes, brown outs, or other service anomalies to ensure a clean and stable power source.

An onsite permanently installed auto-start generator provides secondary power to the Center. This generator is designed to auto-start within 15 seconds after the loss of commercial power and will continue to provide power for an additional 30 minutes after primary power has been restored. Salish also maintains 2000 gallons of on-site fuel which provides enough capacity to run generator for 72 hours at full load and a fueling agreement with Nelson Petroleum ensures that additional fuel is available within 24 hours of request. The generator's fuel supply and system functions are remotely monitored and the system is tested every Monday to ensure its availability in case of an emergency.

Emergency short-term power for the Center can also be provided by an Eaton 9390-80 uninterruptible power supply (UPS) with an additional external battery bay system onsite. This system is designed to power the Data Center at full capacity for approximately 30 minutes. This window allows enough time for the company's generator to start up and transition equipment load without a loss of services due to a primary power outage. The functionality of this system is protected by a preventative maintenance and repair agreement with Emerson Power. To ensure redundancy, an extra battery backup system is also in place. In the event of a prolonged failure of power from the utility, generator, and central UPS provided power, this battery system is designed to provide a minimum of 8 hours of operational power to all critical telecommunications equipment required to maintain dial-tone services.

Salish also maintains sufficient portable generators to support its largest remote subscriber carrier site in the event of a power outage. The company's DSLAM Cabinets are designed with emergency battery backup that will provide a minimum of 8 hours of operational power. In addition, the cabinets are designed with a readily accessible external connection for mobile generators. Salish maintains adequate portable generators to power these cabinets and provide emergency services as needed in the event of an outage.

Not only has Salish taken these precautions, it has put in place a number of additional emergency safeguards. All data equipment installed at the Salish's Server Room has been installed on an ISOBase Seismic Isolation system. This system is used to reduce the effect of an earthquake and minimize damage to essential systems. The Server Room has dual independent air handlers and chillers, configured as a lead/lag system with auto-failover, to ensure adequate cooling. Additionally, the company monitors for changing environmental conditions within the Data Center to ensure proper operations of the environmental control systems. Finally, there are

overhead and under floor smoke detectors and heat sensors protecting the Center as well as a pre-action overhead fire sprinkler system and FM200 waterless fire suppression system.

1(h) Information that demonstrates that it will comply with the applicable consumer protection and service quality standards of WAC 480-120.

Salish is committed to providing the best possible service to all customers in its service areas and complies with the applicable service quality and consumer protection standards found in chapter 480-120 of the Washington Administrative Code.

For example, the company has established multiple dedicated connections to the public switch telephone network (PSTN) through Frontier Communications. These include DS3, T1, and dark fiber lines from the Salish's Data Center directly to the Frontier Central Office in Marysville, WA. Utilizing SS7 connections, Salish has also established diverse connections to geographically redundant locations to guarantee completion of long distance communications. Additionally, Salish has IP addresses assigned directly from the American Registry of Internet Numbers (ARIN) and the company is a multi-homed Internet service provider (ISP). Salish also has service agreements with multiple up-stream Internet providers. Its network is configured to ensure accurate routing with auto-failover in case the primary provider is unavailable. Moreover, the company's network connects to each provider from diverse geographic locations to ensure that service is always available.

Should customers need to contact Salish personnel directly, Salish's corporate offices are conveniently located on the Tulalip Reservation, just off of I-5. These offices are open to the public from 8:00am–4:30pm, Monday through Friday. The company currently has sufficient

staffing to support expanded CLEC operations and ensure responsiveness to consumer queries and complaints. Specifically, the company employs six Engineers/Telephony Technicians, four General Customer Service Representatives, two Specialized Telephony Customer Service Representatives who have expertise in working with other telecommunications providers, four Cabling Technicians, and two Billing Staff members. Billing support is offered during normal business hours and customers have the ability to leave a voicemail after hours and receive a return call the next business day. Payments can be made in person at the company's office or via mail, phone and online. Cash, checks, credit, and debit cards are accepted.

Salish has also established a complaint resolution process to ensure that it is able to investigate and resolve customer requests and complaints quickly and fairly. Company policy gives all Customer Service Representatives and Bill Staff members the authority to issue account credits/refunds as well as waive charges, if appropriate to resolve customer complaints. If an employee is not able to resolve a customer's complaint or if the customer requests to speak to management, our staff has been directed to forward the customer's call or contact information to our Client Services Manager. This manager has the authority to respond and correct any account issue or customer complaint. In the unlikely event that the Client Services Manager is not able to resolve a customer's concern, the Operations Manager has the authority to resolve all remaining issues. If a customer is still not satisfied with the resolution by the Operations Manager, they can request to address the issue directly with the Salish Board of Directors.

Technical support is offered 24/7 with on-call technicians to respond to system outages after normal working hours. The company utilizes an integrated customer ticketing system to follow service issues and requests. The ticketing system will auto schedule completion and service times and will email technicians and managers so that they can respond promptly to

customer problems. This system auto-escalates if a ticket is not resolved within the expected time period by notifying a manager of the delay. Managers will follow up with the assigned technician and/or customer to ensure that adequate resources are deployed and an appropriate course of action is completed. Phone and email contact information for technical service, billing, complaints, and the company's general office will be published on the company's website.

III. CONCLUSION

Through this Petition, Salish has established that it meets the requirements set forth in Washington Administrative Code 480-123-030. Moreover, designation of Salish as an eligible telecommunications carrier will provide customers both on and off the Reservation with additional choice in providers and service offerings, advance the purpose of the universal service fund by promoting access to basic telephone services as well as to advanced telecommunications and information technology in Salish's service area. Salish has already built a state of the art network and will use Universal Service Funds to expand its reach and services. The company is in a unique position to market lifeline services to customers in its service territory through local publications and media. As such, Salish's designation as an ETC serves the public interest. Therefore, Salish respectfully request the Commission designate it as an Eligible Telecommunications Carrier in Washington.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing facts are true and correct.

DATED this 15TH day of January, 2015 at Tulalip, Washington.



Martin Napeahi
Treasurer
Salish Networks, Inc.