

July 30, 2007

Ms. Carole J. Washburn, Executive Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Re: Request for Certification Pursuant to WAC 480-123-060 and 47C.F.R.

§54.314

Dear Ms. Washburn:

Pursuant to WAC 480-123-060, Mashell Telecom, Inc. ("Company") hereby requests that the Washington Utilities and Transportation Commission certify that the Company has met the requirements of 47C.F.R. §54.314 for eligibility for continued receipt of federal high-cost funds.

The certifications and reports that are specified in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 are enclosed.

If there are any questions concerning the foregoing, please contact the undersigned.

Sincerely,

ARNE L. HAYNES

Enclosures

cc: Betty Erdahl (WUTC Staff)

Rick Finnigan

AFFIDAVIT CONTAINING CERTIFICATIONS PURSUANT TO WAC 480-123-060 AND WAC 480-123-070

I, Arne L. Haynes, being of lawful age, state that I am Chairman of the Board of Mashell Telecom, Inc. ("Company"), that I am authorized to execute this Affidavit on behalf of the Company, and that the facts set forth in this Affidavit are true to the best of my knowledge, information and belief. On this basis, I hereby certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. §54.314, as follows:

- (1) That the Company will use federal high-cost universal service fund support only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
- (2) That during the 2006 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h);
- (3) That during the 2006 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations; and
- (4) That during the 2006 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

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

Dated this 30th day of July, 2007 at 805 Pacific Avenue, Tacoma.

Company: Mashell Telecom, Inc.

Its: Chairman of the Board

REPORTS AS REQUIRED BY WAC 480-123-070 AND WAC 480-123-080

Mashell Telecom, Inc. (the "Company") hereby submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report 1: WAC 480-123-070(1)(a): Attached is a copy of the Company's NECA-1 Report for the calendar years 2005 and 2006, that, as of the date of the report, the Company is reporting as the basis for support from the federal high-cost fund.

<u>Report 2</u>: WAC 480-123-070(1)(b): The Company reports that the investments and expenses reported under Report 1, above, benefited customers as follows:

Through the expenditure of these funds, the Company was able to continue to provide services at a level that the Company believes meets the intent set forth in 47 U.S.C. §254 of providing high quality telecommunications services to customers in the service area for which the Company is designated as an ETC.² The Company has made substantial investments over the past several years which allow it to provide quality telecommunications services to its customers in its designated ETC service area. Those expenditures and investments, including those reflected in Report 1, above; generally benefit all customers receiving the federal high-cost fund supported services from the Company within its designated service area. In addition, during 2006, the Company was engaged in a major investment project within its designated ETC service area as described below:

The Company installed three new customer service areas (CSAs) and expanded on existing CSAs at a cost in excess of \$400,000. The installation and expansion of CSAs provides additional capacity for customers and provides a platform on which additional telecommunications services, including, but not limited to, advanced services, can be provided to customers. This project improves service to the Company's customers with a significant growth potential to adjacent properties in its designated ETC service area.

Report 3: WAC 480-123-070(4): The Company reports that the Company is not aware of any complaints during calendar year 2006 to the Federal Communications Commission or the Consumer Protection Division of the Office of the Attorney General of the State of Washington concerning the services provided to its customers by the Company that are either subject to the regulatory jurisdiction of the Washington Utilities and Transportation Commission or among the services supported by the federal high-cost fund.²

¹ It is the Company's understanding that it is not required to submit the reports described in WAC 480-123-070(2) and (3).

² The references to the services supported by the federal high-cost fund is to the services designated for support as set forth in 47 C.F.R. §54.101(a).

<u>Report 4</u>: WAC 480-123-080(1)(b) and WAC 480-123-080(2): The Company reports as follows:

As they are known to the Company at the date of this Report, the planned investment and expenses related to Washington state for the periods January 1, 2007, through December 31, 2007, and January 1, 2008, through December 31, 2008, that the Company expects to use as a basis to request federal high-cost support are expected to be relatively similar to those investments and expenses the Company has set forth in its information filed under Report 1, above, taking into account normal fluctuations in investment and expense levels. The Company expects that levels of expenses will remain relatively the same as those it experienced in calendar year 2006, subject to the effects of inflation and other commonly experienced changes in cost of labor and materials. The Company does not anticipate major adjustments in staffing levels for the relevant period. The Company expects that it will have relatively the same level of investment related to maintenance, replacement and minor upgrades of equipment and plant as occurred in calendar year 2006. The Company has not completed its budgeting process and does not have final numbers prepared for investment and expense levels for 2008.

In addition to the foregoing, in 2007 the Company began a major construction project to replace aerial cable with buried cable in order to decrease outages and increase reliability of the network. The Company also began several major construction projects to expand services to feed several subdivisions under construction in the ETC's service area. These projects have an expected cost in excess of \$200,000

The expected benefit to customers from the anticipated investment and expenditures is that customers will continue to receive a high level of telecommunications service. As to the specific investment projects identified above, it is expected that customers will benefit by increased reliability of service and the increased availability of a broader range of telecommunications services, including, but not limited to, advanced services. The projects are expected to provide a benefit to all of the Company's customers in the Company's designated ETC service area.

SAC:	522431	SA Name:	Mashell Telecor	n, Inc.	Regio	n: Pacific
I. EXC	HANGE CARRIER/DATA IDENTIFICATION					
(010)	Study Area Code		(010)	522431		
(020)	Contact Name		(020)	Steve Le	entz	
(030)	Contact Telephone Number		(030)	206.302.	6586	
(040)	USF Data Collection Period		(040)	2007-1		
Data Line	Description		Latest View 2006-1 Amount	Data <u>Line</u>	Pending View 2007-1 Amount	Data Source
II. WO	RKING LOOPS					
(060)	Total Loops (Cat. 1.1, 1.2 and 1.3)	-	3,907	(060)	3,868	
(070)	Category 1.3 Loops (Excluding Cat. 1.3 TWX Loops)		3,892	(070)	3,849	**************************************
(080)	Reserved					
III. IN\	ESTMENT, EXPENSE AND TAXES					
Net Pla	ant investment					
(160)	Acct. 2001 - Telephone Plant in Service		13,663,133	(160)	14,226,996	
(170)	Acct. 1220 - Materials and Supplies	-	489,175	(170)	241,356	to the same of the
(190)	Acct. 3100 - Accumulated Depreciation	-	10,654,718	(190)	11,486,442	
(195)	Acct. 3400 - Accumulated Amortization Tangible	-	0	(195)	0	
(200)	Reserved		N O	ΕN	TRY RE	QUIRED
(205)	Reserved		ΝO	ΕN	TRY RE	QUIRED
(210)	Acct. 4340 - Net Noncurrent Deferred Operating Taxes	Income	233,760	(210)	84,606	
(220)	Net Plant Investment (Sum of Lines 160 + 170 Minus Lines 190 Through 210)		3,263,830	(220)	2,897,304	Calculation

SAC: 522431

SA Name: Mashell Telecom, Inc.

Data Line	Description	Latest View 2006-1 Amount	Data <u>Line</u>	Pending View 2007-1 Amount	Data Source
Selecte	d Plant Accounts				
(230)	Acct. 2210 - Central Office Switching Equipment	1,082,351	(230)	1,185,795	
(235)	Acct. 2220 - Operator System Equipment	<u> </u>	(235)	0	-
(240)	Acct. 2230 - Central Office Transmission Equipment	2,937,326	(240)	3,062,633	
(245)	Total Central Office Equipment (Sum of Lines 230 Through 240)	4,019,677	(245)	4,248,428	Calculation
(250)	Circuit Equipment Category 4.13	2,364,416	(250)	2,328,860	
(255)	Acct. 2410 - Cable and Wire Facilities Total	7,929,782	(255)	8,102,041	
(260)	Acct. 3100 (2210) - Accumulated Depreciation Central Office Switching Equipment	1,037,673	(260)	1,041,070	
(265)	Acct. 3100 (2220) - Accumulated Depreciation Operator System Equipment	0_	(265)	0	
(270)	Acct. 3100 (2230) - Accumulated Depreciation Central Office Transmission Equipment	2,440,586	(270)	2,685,304	
(275)	Acct. 3100 (2210–2230) - Total Accumulated Depreciation Central Office Equipment				
	(Sum of Lines 260 Through 270)	3,478,259	(275)	3,726,374	Calculation
(280)	Acct. 3100 (2410) - Accumulated Depreciation Cable and Wire Facilities	5,769,532	(280)	6,189,406	Recorded to the

SAC: 522431

SA Name: Mashell Telecom, Inc.

Data <u>Line</u>	Description	Latest View 2006-1 Amount	Data Line	Pending View 2007-1 Amount	Data Source
(285)	Reserved	ΝO	ΕN	TRY RE	QUIRED
(290)	Reserved	ΝO	ΕN	TRY RE	QUIRED
(295)	Reserved	N O	ΕN	TRY RE	QUIRED
(300)	Reserved	ΝO	ΕN	TRY RE	QUIRED
(305)	Reserved	N O	E N	TRY RE	QUIRED
(310)	Acct. 4340 (2210) - Net Noncurrent Deferred Operating Income Taxes - Central Office Switching Equipment	0	(310)	(17,299)	
(315)	Acct. 4340 (2220) - Net Noncurrent Deferred Operating Income Taxes - Operator System Equipment	0	(315)	0	
(320)	Acct. 4340 (2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Transmission Equipment	84,087	(320)	27,421	
(325)	Acct. 4340 (2210–2230) - Net Noncurrent Deferred Operating Income Taxes - Central Office Equipment (Sum of Lines 310 Through 320)	84,087	(325)	10,122	Calculation
(330)	Acct. 4340 (2410) - Net Noncurrent Deferred Operating Income Taxes - Cable and Wire Facilities	149,673	(330)	121,014	

SAC: 522431

SA Name: Mashell Telecom, Inc.

Data Line	Description	Latest View 2006-1 Amount	Data Line	Pending View 2007-1 Amount	Data Source		
Plant-Specific Operation Expense							
(335)	Acct. 6110 - Network Support Expense Total	24,056	(335)	14,800			
(340)	Acct. 6110 - Benefits Portion of Network Support Expense	7,546	(340)	682			
(345)	Acct. 6110 - Rents Portion of Network Support Expense	0	(345)	0			
(350)	Acct. 6120 - General Support Expense Total	122,792	(350)	244,219			
(355)	Acct. 6120 - Benefits Portion of General Support Expense	5,869	(355)	20,317			
(360)	Acct. 6120 - Rents Portion of General Support Expense	27,442	(360)	91,102			
(365)	Acct. 6210 - Central Office Switching Expense - Total	71,798	(365)	163,947	1994-1994 - 1-1-1894 - 1-1-1894 - 1-1-1894 - 1-1-1894 - 1-1-1894 - 1-1-1894 - 1-1-1894 - 1-1894 - 1-1894 - 1-1		
(370)	Acct. 6210 - Benefits Portion of Central Office Switching Expense	12,062	(370)	25,988			
(375)	Acct. 6210 - Rents Portion of Central Office Switching Expense	. 11	(375)	0			
(380)	Acct. 6220 - Operator System Expense - Total	0	(380)				
(385)	Acct. 6220 - Benefits Portion of Operator System Expense	0	(385)	0	NAME OF THE OWNER, THE		
(390)	Acct. 6220 - Rents Portion of Operator System Expense	0	(390)	0			
(395)	Acct. 6230 - Central Office Expense - Transmission Equipment - Total	94,511	(395)	212,189			

SAC: 522431

SA Name: Mashell Telecom, Inc.

Data Line	Description	Latest View 2006-1 Amount	Data Line	Pending View 2007-1 Amount	Data Source
(400)	Acct. 6230 - Benefits Portion of Central Office Expense - Transmission Equipment	4,207	(400)	15,966	
(405)	Acct. 6230 - Rents Portion of Central Office Expense - Transmission Equipment	0	(405)	0	
(410)	Accts. 6210–6230 - Central Office Expense Total (Sum of Lines 365 + 380 + 395)	166,309	(410)	376,135	Calculation
(415)	Reserved	ΝO	ΕN	TRY RE	QUIRED
(420)	Reserved	ΝO	ΕN	TRY RE	QUIRED
(425)	Reserved	ΝO	ΕN	TRY RE	QUIRED
(430)	Acct. 6410 - Cable and Wire Facilities Expense - Total	286,541	(430)	331,075	
(435)	Acct. 6410 - Benefits Portion Cable and Wire Facilities Expense	35,715	(435)	53,551	
(440)	Acct. 6410 - Rents Portion Cable and Wire Facilities Expense	13,463	(440)	20,465	
(445)	Total Plant-Specific Expense (Sum of Lines 335 + 350 + 365 + 380 + 395 + 415 + 430)	599,699	(445)	966,230	Calculation
Plant-No	onspecific Expense				
(450)	Acct. 6530 - Network Operations Expense - Total	201,137	(450)	168,928	
(455)	Acct. 6530 - Benefits Portion Network Operations Expense	53,190	(455)	38,529	

SAC: 522431

SA Name: Mashell Telecom, Inc.

Data <u>Line</u>	Description	Latest View 2006-1 Amount	Data <u>Line</u>	Pending View 2007-1 Amount	Data Source
(465)	Reserved	ΝO	ΕN	TRY REC	QUIRED
(470)	Reserved	ΝO	ΕN	TRY REC	QUIRED
(480)	Reserved	ΝO	ΕN	TRY REC	QUIRED
(485)	Reserved	N O	ΕN	TRY REC	QUIRED
(500)	Reserved	N O	ΕN	TRY REC	QUIRED
(505)	Reserved	N O	ΕN	TRY REC	QUIRED
Depreci	ation and Amortization Expenses				
(510)	Acct. 6560 (2210) - Depreciation and Amortization Expense - Central Office Switching Equipment	32,259	(510)	57,130	
(515)	Acct. 6560 (2220) - Depreciation and Amortization Expense - Operator System Equipment	0	(515)	0	
(520)	Acct. 6560 (2230) - Depreciation and Amortization Expense - Central Office Transmission Equipment	317,194	(520)	331,672	
(525)	Acct. 6560 (2210–2230) Depreciation and Amortization Central Office Equipment (Sum of Lines 510 Through 520)	349,452	(525)	388,803	Calculation
(530)	Acct. 6560 (2410) - Depreciation and Amortization Expense - Cable and Wire Facilities	437,926	(530)	419,874	
Corpora	te Operating Expenses				
(535)	Acct. 6710 - Executive and Planning Expense - Total	835,275	(535)	681,921	
(540)	Acct. 6710 - Benefits Portion Executive and Planning Expense	258,019	(540)	167,500	

SAC: 522431

SA Name: Mashell Telecom, Inc.

Data <u>Line</u>	Description	Latest View 2006-1 Amount	Data <u>Line</u>	Pendin 2007-1	_	Data Source
(550)	Acct. 6720 - General Administrative Expense - Total	567,868	(550)	6	34,276	
(555)	Acct. 6720 - Benefits Portion - General Administrative Expense	80,013	(555)		80,288	
(565)	Total Corporate Operations Expense (Sum of Lines 535 + 550)	1,403,143	(565)	1,3	16,197	Calculation
Other E	xpenses and Revenues					
(600)	Benefits Portion of All Operating Expenses - Total	591,953	(600)	5	43,745	
(610)	Rents Portion of All Operating Expenses - Total	40,916	(610)	1	11,567	
(620)	Reserved	ΝO	ΕN	TRY	RE	QUIRED
(630)	Reserved	ΝO	ΕN	TRY	RE	QUIRED
Taxes						
(650)	Acct. 7200 - Operating Taxes	123,401	(650)	10	06,632	
(655)	Reserved	ΝO	ΕN	TRY	RE	QUIRED
IV. PAF	RT 36 - COST STUDY DATA					
(700)	Acct. 2410 - Cost Study Average Cable and Wire Facilities	7,760,733	(700)	8,0	15,912	
(710)	Cost Study Average Cable and Wire Facilities Cat. 1 - Total Exchange Line C&WF Excluding					
	Wide Band	7,009,002	(710)	7,27	2,748	***

SAC: 522431

SA Name: Mashell Telecom, Inc.

_				Ū	
Data Line	Description	Latest View 2006-1 Amount	Data Line	Pending View 2007-1 Amount	Data Source
	Decomplien	2000-1 Amount	LIITE	2007-1 Amount	Oodice
	ORTIZABLE TANGIBLE ASSETS o instructions prior to completing this section)				
(MOIGH					
(800)	Acct. 2680 - Amortizable Tangible Assets			_	
	angible Assets	0	(800)	0	
(805)	Acct. 2680 (2230) - Amortizable				
	Tangible Assets - Central Office Transmission Equipment	0	(805)	0	
(0.4.0)	, <i>.</i>		(000)	<u>_</u>	
(810)	Acct. 2680 (2230) - Amortizable Tangible Assets - Central				
	Office Transmission Equipment				
	Allocated to Category 4.13	0	(810)	0	
(815)	Acct. 2680 (2410) - Amortizable				
	Tangible Assets - Cable and Wire Facilities	0	(045)		
	Who I domines	0	(815)		
(820)	Acct. 2680 (2410) - Amortizable Tangible Assets - Cable and				
	Wire Facilities Allocated to				
	Category 1	0	(820)	0	M
(830)	Acct. 6560 (2680) - Depreciation				
	and Amortization Expense -				
	Amortizable Tangible Assets	0	(830)	0	
VI. CO	MMENTS/SIGNIFICANT CHANGE EXPLANATION				

	T REVENUE: OFFSET TO EXPENSE				
(1)	Account 6120 - General Support Expense	0		0	Correct Year Input form
(2)	Account 6210 - Central Office Switching Expense	0		0	Correct Year Input form
(3)	Account 6220 - Central Office Operator Expense	0		0	Correct Year Input form
(4)	Account 6230 - Central Office Transmission Expense	0		0	Correct Year Input form
(5)	Account 6310 - Information Orig/Term Expense	0		0	Correct Year Input form
(6)	Account 6410 - Cable & Wire Facilities Expense	0		0	Correct Year Input form
	TOTAL	0		0	Ln 1-6
	131712				

Mashell Telecom, Inc. National Exchange Carrier Association Universal Service Fund - High Cost Loop Support

7/29/2007

VII. CERTIFICATION FORM		
IAM Chairmon of the		HEREBY CERTIFY THAT I HAVE OVERAL
RESPONSIBILITY FOR THE PREPARATION OF ALL DATA IN THE	EATTACHED	
2007-1 (TITLE OF DATA SUBMISSION)		ashell Telecom, Inc. NAME OF CARRIER)
AND THAT I AM AUTHORIZED TO EXECUTE THIS CERTIFICATION TO ME OR PROVIDED TO ME BY EMPLOYEES RESPONSIBLE FOR THIS SUBMISSION, I HEREBY CERTIFY THAT THE DATA HAVE BARE COMPLETE, ACCURATE, AND CONSISTENT WITH THE RULCOMMISSION.	OR THE PREPARATION OF THE DATA IN BEEN EXAMINED AND REVIEWED AND	
DATE:	July 30, 200	7
CERTIFYING SIGNATURE:	- Christle	yre
NAME:	- HRNE L. HAYS	DES
TITLE:	_ Chairmen	
PERIOD COVERED:	2006-2007	
VII.A. RURAL STATUS: The rural status of this company during the	e next calendar year after this filing will be:	
X RURAL	NON-RURAL	
VII.B. ACQUISITION CERTIFICATION		
X MY COMPANY HAS NOT ACQUIRED AN EXCHANGE DU	RING THE PERIOD COVERED.	
MY COMPANY HAS ACQUIRED THE FOLLOWING EXCH Exchange Name	ANGE(S) DURING THE PERIOD COVERED. Selling Company	No of Long
	Coming Company	No. of Loops
PURSUANT TO FCC RULES, SECTION 69.901(C), EXCHANGE CA UNIVERSAL SERVICE FUND DATA SUBMITTED TO NECA.	RRIERS ARE REQUIRED TO CERTIFY	

(FCC RULES STATE THAT PERSONS MAKING WILLFUL FALSE STATEMENTS IN THIS DATA SUBMISSION CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER THE PROVISIONS OF THE U.S. CODE, TITLE 18, SECTION 1001).