

EXHIBIT 3

PLAN TO PROVIDE, MAINTAIN, OR ENHANCE BROADBAND SERVICES

This Broadband Plan is being submitted by Mashell Telecom, Inc. in compliance with RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d). Under the terms of the legislation incorporated into RCW 80.36.650(3), a recipient of support from the state Universal Communications Program is to submit a broadband plan showing how the provider will provide, maintain, or enhance broadband services in its service area. As set out in WAC 480-123-110(1)(d), the broadband plan is to include specific elements, but only to the extent applicable to that particular broadband plan. The broadband plan does not have to include all elements but it can include any of the following elements: (1) a multi-year investment plan; (2) specific projects that are projected to provide or enhance broadband service at speeds required by the Commission or the Federal Communications Commission; (3) a plan for maintenance of broadband services in the provider's service area; (4) a description of how the provider will enhance broadband services in its service area; and (5) any other information that the Commission may request to assist in the Commission's review and analysis of the provider's broadband plan. Where there are specific projects, the project information is to include an estimated timeline, geographic location, number of locations passed, and upload and download speeds that are projected to be produced by the project.

Mashell Telecom, Inc. has constructed sufficient facilities for it to fall into either criterion three or criterion four of WAC 480-123-110 and as a result has constructed substantial broadband infrastructure throughout much or all of its service territory. This means that the company is looking for program support to allow it to continue to provide telecommunications services and broadband services at the levels that are provided today, with enhancements becoming available where appropriate.

The Company has already met the Federal Communications Commission's total broadband deployment obligations associated with federal high-cost program support as of the date of the Petition to which this is an Exhibit. In addition, the Company also meets the additional locations requested by the Commission as part of the State Universal Communications Program. Since January 1, 2018, the Company has invested over [REDACTED] to deploy secure and resilient broadband infrastructure to expand access for communities in both our Eatonville and Kapowsin exchanges. In 2019, the Company completed a five-year plan (2015-2019) to upgrade aging portions of its outside plant and network infrastructure to a Fiber-to-the-premise (FTTP) architecture. The FTTP network architecture provides customers' access to voice, multimedia, and data services over one unified access platform.

We are constantly working to identify gaps in service, gather service location data and quality of service complaints, and develop strategic planning for future broadband deployment and adoption. One example of this, is the recent launch of our student's access initiative program. The Company worked with schools to get students who cannot otherwise afford it a broadband connection so that the students can continue their education from home. In addition,

REDACTED FOR PUBLIC INSPECTION

all customer requests for increased speeds are individually considered for economic feasibility and completed where and when possible.

Our FTTP network currently provides 1G/1G synchronous service. The company currently offers 25/3Mbps or greater speeds to 49% of serviceable locations. Currently reported 25/3 Mbps availability to homes passed is under-reported due to the lack of data in our mapping records for homes passed and serviceable within 10 days. This amount cannot be directly quantified at the current time but is estimated at an additional 12% of passings. The discrepancy will be addressed with continued efforts the Company is making to incorporate a one-to-one relationship for addresses passed as well as continued clean up related to the broadband data location fabric. There is currently no defined timeline for completion of this effort.

The company's five-year investment plan provides for capital expenditures to expand our FTTP network annually to service an additional twenty-four percent of our customer base that currently has service speeds below 25/3Mbps. The Company goal is to have eighty percent of our network capable of 25/3Mbps speeds by 2027, with fifty-two percent in 2023 and fifty-nine percent in 2024. These percentages do not include the 12% estimate mentioned above. The current broadband deployment plan has been revised to recognize resource constraints related to staffing and capital investment available for deployment. We recognize this 2023 Broadband Plan as revised is less aggressive than the previous 2022 broadband plan; however, still ambitious based on the investment required to deploy FTTP to the remaining locations in our service area.

Supply chain shortages experienced in prior years and early 2022 are no longer an issue and the company has successfully deployed fiber to 32 locations year to date. The Company is on target to hit 75% of the projected goal for the current year. For 2024, estimated repairs and maintenance expenses and capex total [REDACTED]. Repairs and maintenance costs consist primarily of general support equipment such as vehicles, tools, and buildings as well as general annual repairs related to service outages and facility relocation. The FTTP plant is relatively new and the Company does not forecast significant repairs and maintenance expenses.

The foregoing Broadband Plan was adopted by Mashell Telecom, Inc. on July 1st, 2023.

EXHIBIT 4

CERTIFICATION RELATING TO ACCOUNTING STANDARDS

I, **Brian Haynes**, am an officer of **Mashell Telecom, Inc.**, (the Company as set out in the Petition to which this is an Exhibit). Thereby, I certify that the Company complies with state and federal accounting, cost allocation, and cost adjustment rules pertaining an incumbent local exchange carrier for the period of time that the Company will receive support under the Petition to which this is an Exhibit.

I declare under penalty of perjury under the law of Washington that the foregoing is true and correct as set forth in RCW 5.50.050. Signed on this 18th day of September, 2023, at Tacoma, Washington.



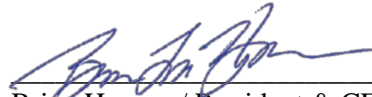
Brian Haynes / President and CEO

EXHIBIT 6

CONTINUED OPERATIONS CERTIFICATE

I, **Brian Haynes**, an officer of **Mashell Telecom, Inc.**, (the Company as set out in the Petition to which this is an Exhibit) declare under penalty of perjury under the law of Washington that if the company receives program support, we will continue to provide communications services throughout our service territory in Washington for which the company is seeking and receives Program support, and the company's affiliate will continue to provide broadband services during the entirety of the 2024 which the company is applying for support from the program.

Signed on this 18th day of September, 2023, at Tacoma, Washington.



Brian Haynes / President & CEO

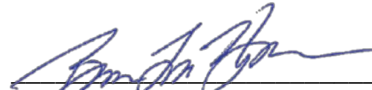
EXHIBIT 7

CERTIFICATION OF ELIGIBILITY

I, **Brian Haynes**, am an officer of **Mashell Telecom, Inc.** (the Company as set out in the Petition to which this is an Exhibit) and thereby certify that the Company is in compliance with the Federal Communications Commission's obligation for deployment of broadband at speeds specified by the Federal Communications Commission that apply to the Company.

Further, I certify that the Company has already met the Federal Communications Commission's total deployment obligations associated with federal high-cost program support as of the date of the Petition to which this is an Exhibit. Further, I certify that the Company has since January 1, 2018, deployed broadband to the number of locations that Washington Utilities and Transportation Commission has determined by order.

I declare under penalty of perjury under the law of Washington that the foregoing certification is true and correct as set forth in RCW 5.5.010 and is made this 18th day of September, 2023, at Tacoma, Washington.



Brian Haynes / President & CEO