

CONFIDENTIAL FILING

June 26, 2016

VIA ELECTRONIC FILING SYSTEM

Mr. Steven V. King, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, and 14-58 CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Mr. King:

MASHELL TELECOM, INC. DBA RAINIER CONNECT (“MASHELL”), a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted Line 3005 financial data. MASHELL respectfully provides the Commission with its confidential financial data so that all its reporting obligations are satisfied.

MASHELL, by its authorized representative, respectfully submits confidential information in compliance with 47 C.F.R. §§ 54.313 and 54.422, under seal, as specified with the Protective Order adopted on November 16, 2012 reference DA 12-1857 (“Protective Order”) and also in conjunction with WAC 480-07-160.

MASHELL requests confidential treatment of certain information submitted with its annual reporting requirements as a privately-held rate of return carrier and high-cost recipient in Docket No. 10-90. The confidential information is required by 47 C.F.R. § 54.313(f)(2) and includes detailed financial information that is competitively sensitive. Disclosure of this confidential information would have a substantial negative impact on MASHELL. Such information would not normally be made available to the public for inspection because of the financial information and should be afforded confidential treatment under WAC 480-07-160.

As specified in the WAC 480-07-140, copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked “REDACTED - FOR PUBLIC INSPECTION” and the confidential submission is marked



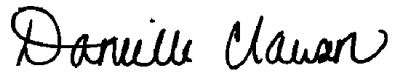
THINK INSIDE THE BOX
Business and Residential Communications

REDACTED FOR PUBLIC INSPECTION

“CONFIDENTIAL PER WAC 480-07-160”. There is no native format available for the attached submission.

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,

A handwritten signature in black ink that reads "Danielle Clause". The signature is written in a cursive, flowing style.

Danielle Clause, Controller
For Mashell Telecom Inc. dba Rainier Connect

Enclosures

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2017
<030> Contact Name: Person USAC should contact with questions about this data	Danielle Clausen
<035> Contact Telephone Number: Number of the person identified in data line <030>	3608324130 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	danielle.clausen@rainierconnect.net
Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035>	Contact Telephone Number - Number of person identified in data line <030>	3608324130 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

<110> Has your company received its ETC certification from the FCC? (yes / no)

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? (yes / no)

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

522431wa100.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	522431
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<039> Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	522431
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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed voice
<410>	Complaints per 1000 customers for fixed voice	3.9E-4
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only fixed broadband
<440>	Complaints per 1000 customers for fixed broadband	0.0
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes

522431wa510.pdf

<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance

**(600) Functionality in Emergency Situations
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	522431
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<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035> Contact Telephone Number - Number of person identified in data line <030>	3608324130 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	522431wa610.pdf

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Danielle Clausen
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<039> Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 522431wa1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
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July 2013

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<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2017
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3608324130 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <https://www.rainierconnect.com/legal-notice-tariffs>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- | | | | |
|---------|---|--|----------------------|
| <2010> | 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support | <input type="text"/> | |
| <2011> | 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support | <input type="text"/> | |
| <2022> | Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only. | <input type="text"/> | |
| <2023> | The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only. | <input type="text"/> | |
| <2024A> | Round 2 Recipient of Incremental Support? | <input type="text"/> | <input type="text"/> |
| <2024B> | Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only. | Name of Attached Document Listing Required Information | <input type="text"/> |
| <2025A> | Round 1 or Round 2 Recipient of Incremental Support? | <input type="text"/> | |
| <2025B> | Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13- | Name of Attached Document Listing Required Information | <input type="text"/> |
| <2015> | 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4) | <input type="text"/> | |

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010> Study Area Code 522431

<015> Study Area Name MASHELL TELECOM INC

<020> Program Year 2017

<030> Contact Name - Person USAC should contact regarding this data Danielle Clausen

<035> Contact Telephone Number - Number of person identified in data line <030> 3608324130 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> danielle.clausen@rainierconnect.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009) Progress Report on 5 Year Plan
Carrier certifies to 54.313(f)(1)(iii)

(3010A) Milestone Certification {47 CFR § 54.313(f)(1)(i)} Yes - Attach Certification

(3010B) Please Provide Attachment Name of Attached Document Listing Required Information

(3012A) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} No - No New Community Anchors

(3012B) Please Provide Attachment Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or
(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information Name of Attached Document Listing Required Information

(3005) Rate Of Return Carrier Additional Documentation (Continued)

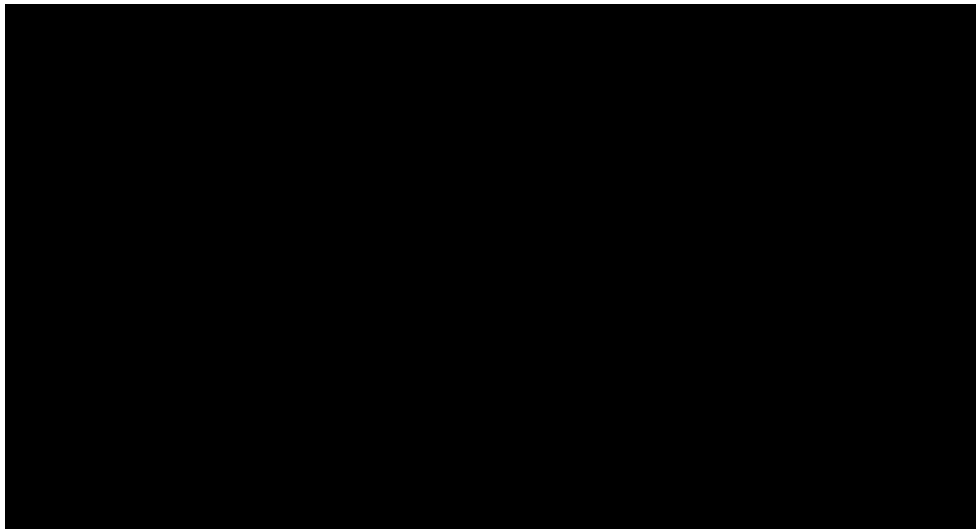
FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	MASHELL TELECOM INC
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/30/2016
Printed name of Authorized Officer:	BRIAN HAYNES
Title or position of Authorized Officer:	PRESIDENT/CEO
Telephone number of Authorized Officer:	3608326161 ext.
Study Area Code of Reporting Carrier:	522431 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039> Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Progress Report
47 C.F.R §54.313(a)(1)
Mashell Telecom, Inc.

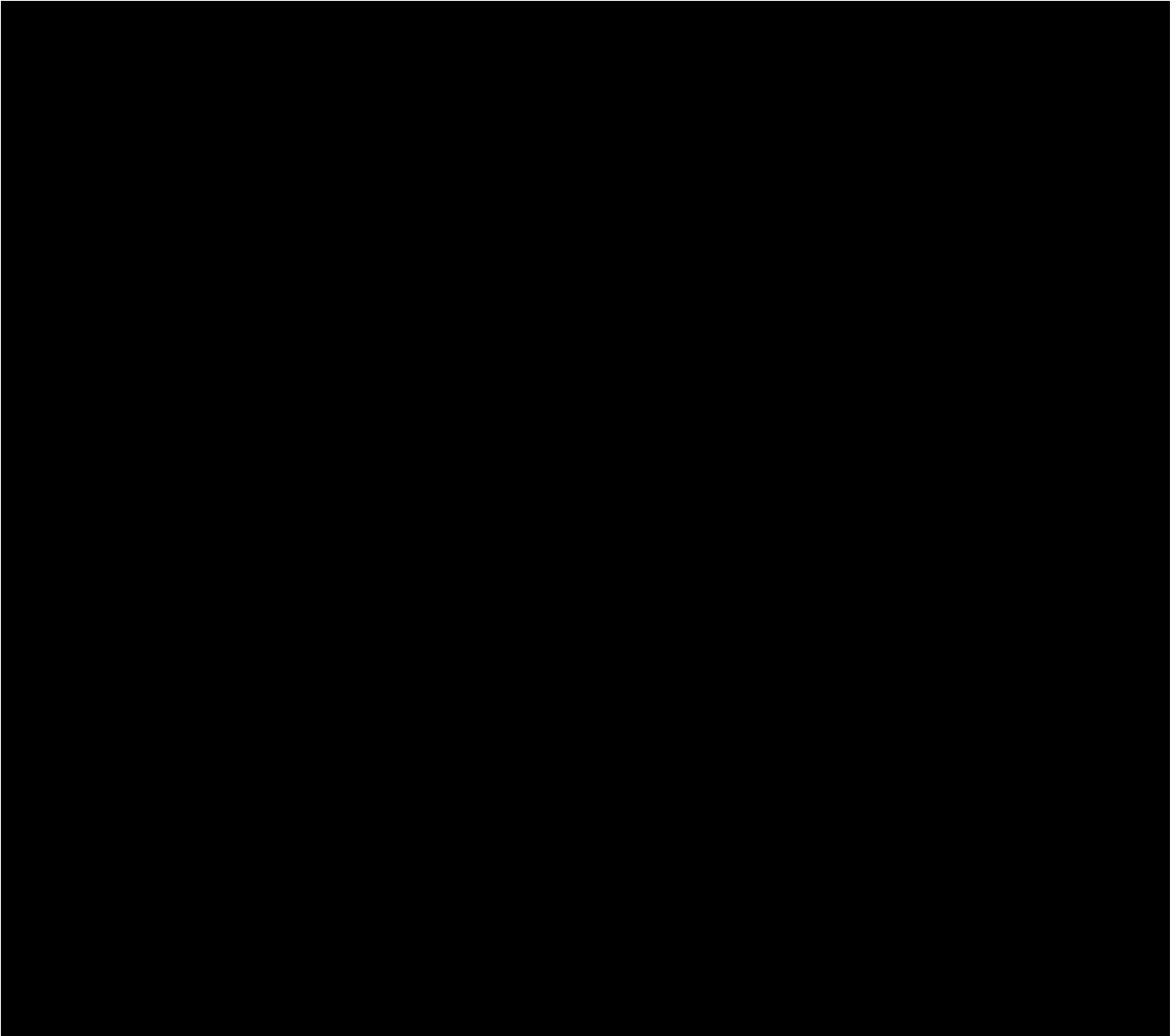
Progress Report–

Mashell Telecom, Inc. submits its five year progress report for Service Quality Improvement pursuant to C.F.R. 54.313(a)(1) detailing its progress towards meeting its targets for improvement and upgrade to Mashell Telecom, Inc.'s network throughout its service area.

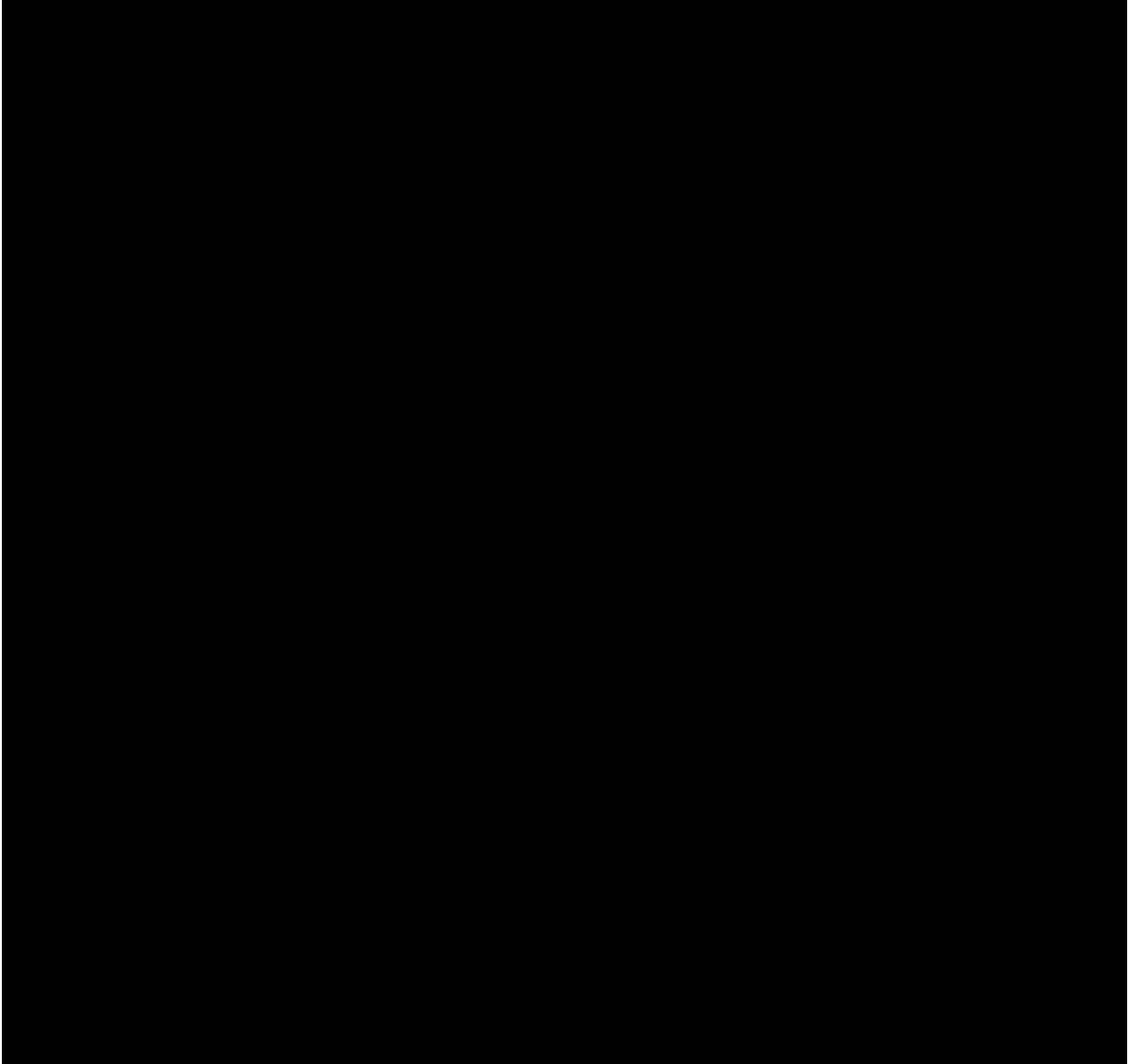
This progress report details how Mashell Telecom, Inc. continues to meet its broadband obligations within its service area, completes service requests within a reasonable amount of time and provides reliable state of the art telecommunications services within its study area that includes 3,143 rural customers. The projects listed within the progress report are designed to continue to provide improved service quality, improved service coverage, and improve service capacity within Mashell Telecom's study area. In addition, this progress report provides sufficient data that details capital and operational expenditures, the amount of USF received allocated between capital and operational expenditures. All USF funds received and detailed within this progress report were used in accordance with federal rules and regulations towards improving service quality, service coverage, and service capacity. All projects are currently being worked on within specified timeframes and will have a simultaneous direct impact to improving service quality, service coverage, and service capacity for voice and broadband networks.

Progress Report
47 C.F.R §54.313(a)(1)
Mashell Telecom, Inc.

The Company projects that the capital expenditures, by Part 32 account, for 2016 through 2020 for the projects related to VOICE & BROADBAND services will be:



Progress Report
47 C.F.R §54.313(a)(1)
Mashell Telecom, Inc.



Response Line 510
Mashell Telecom, Inc.
Study Area 522431

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) MASHELL TELECOM, INC. is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. This document details the processes and procedures that Mashell Telecom, Inc. (the "Company") follows to ensure compliance with service quality standards and consumer protection rules as laid out in FCC Form 481 Instructions.

Mashell Telecom, Inc. provides CPNI training to its new employees and trains existing employees on an annual basis. The Company also conducts subscriber outreach regarding Customer Proprietary Network Information (CPNI) by periodically placing CPNI explanation messages into subscriber's bills. In addition, Mashell Telecom, Inc. trains staff on FTC Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and FTC Red Flag training and understand obligations to adherence of applicable rules.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed.

In addition, employees are periodically briefed on service quality standards and consumer protection issues. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. A recent example is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If complaints are filed with the Company related to service quality standards or consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made. It should be noted that the Company has received very few complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which, as noted above, are not caused by the Company.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) MASHELL TELECOM, INC. (ILEC) is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband service issues on an annual basis. In addition, ILEC has placed on its website at www.rainierconnect.net its network practices and policies regarding FCC's Net Neutrality

Rules. ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers (“ISP”). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA’s website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
Mashell Telecom, Inc.
Study Area 522431

Functionality in Emergency Situations:

Voice & Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) MASHELL TELECOM, INC. meets the requirements to remain functional in emergency situations and has the following capabilities; back-up power is provided to Mashell Telecom, Inc.'s central office by use of a fixed generator and batteries that provide it with 100 hours of emergency power. We have made arrangements for emergency refueling, and have contingency plans in the event that fuel trucks are unable to reach the central office. In addition, Mashell Telecom, Inc. field electronics have 8 hours of battery back-up power extended by use of fixed or mobile generators. Mashell Telecom, Inc. also has SONET technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. Lastly, Mashell Telecom, Inc. is prepared and capable of managing traffic spikes resulting from emergency situations.

Response to Line 1010
Mashell Telecom, Inc.
Study Area 522431

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Mashell Telecom, Inc. (“Company”) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$47.48 as specified in Public Notice DA 15-470 issued on April 16, 2015. Company’s current total residential local end-user rate¹ of \$18.00 (which includes a local fee of \$18.00, mandated state fees of \$0.00 and mandatory extended area service charges of \$0.00) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) “The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average.”

Response Line 3010
Mashell Telecom, Inc.
Study Area 522431

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Mashell Telecom, Inc. ("Company") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time. Details on how Company is meeting its obligations for broadband goals and required obligations are specified within the FCC Form 481 annual filing.



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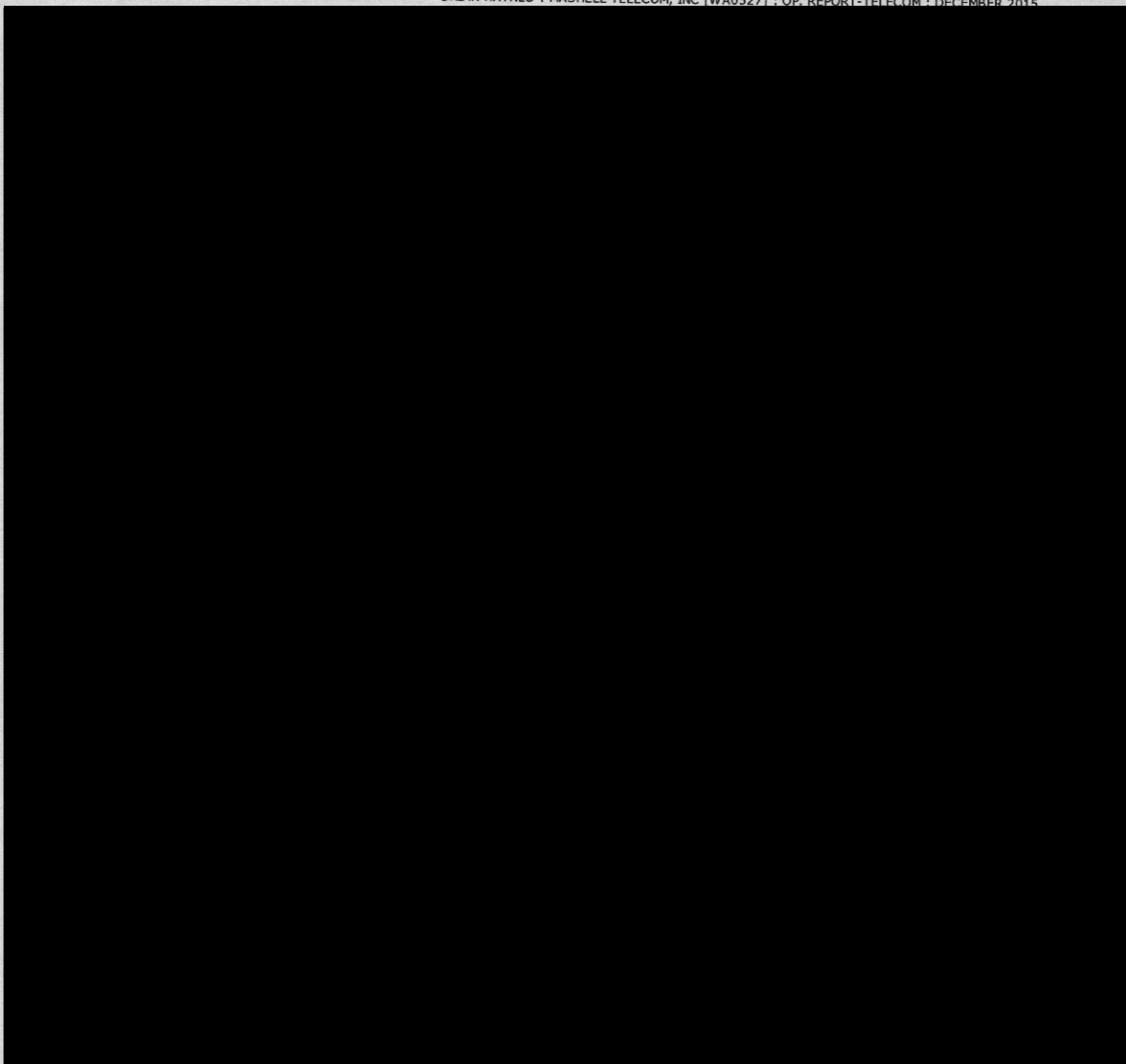
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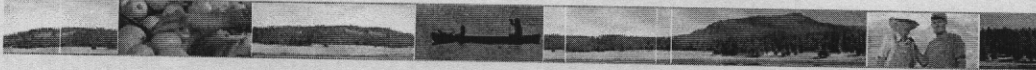
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Part I: Statement of Cash Flows

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.

1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)
- CASH FLOWS FROM OPERATING ACTIVITIES
2. Net Income
- Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities*
3. Add: Depreciation
4. Add: Amortization
5. Other (Explain)
- Changes in Operating Assets and Liabilities*
6. Decrease/(Increase) in Accounts Receivable
7. Decrease/(Increase) in Materials and Inventory
8. Decrease/(Increase) in Prepayments and Deferred Charges
9. Decrease/(Increase) in Other Current Assets
10. Increase/(Decrease) in Accounts Payable
11. Increase/(Decrease) in Advance Billings & Payments
12. Increase/(Decrease) in Other Current Liabilities
13. Net Cash Provided/(Used) by Operations
- CASH FLOWS FROM FINANCING ACTIVITIES
14. Decrease/(Increase) in Notes Receivable
15. Increase/(Decrease) in Notes Payable
16. Increase/(Decrease) in Customer Deposits
17. Net Increase/(Decrease) in Long Term Debt (including current maturities)
18. Increase/(Decrease) in Other Liabilities & Deferred Credits
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital
20. Less: Payment of Dividends
21. Less: Patronage Capital Credits Retired
22. Other (Explain)
23. Net Cash Provided/(Used) by Financing Activities
- CASH FLOWS FROM INVESTING ACTIVITIES
24. Net Capital Expenditures (Property, Plant & Equipment)
25. Other Long-Term Investments
26. Other Noncurrent Assets & Jurisdictional Differences
27. Other (Explain)
28. Net Cash Provided/(Used) by Investing Activities
29. Net Increase/(Decrease) in Cash
30. Ending Cash

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Part H: Current Depreciation Rates

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

Yes No

Equipment Category

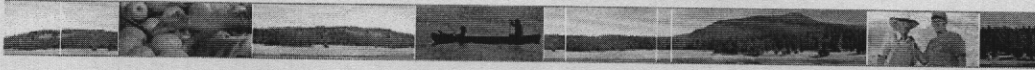
1. Land and support assets - Motor Vehicles
2. Land and support assets - Aircraft
3. Land and support assets - Special purpose vehicles
4. Land and support assets - Garage and other work equipment
5. Land and support assets - Buildings
6. Land and support assets - Furniture and Office equipment
7. Land and support assets - General purpose computers
8. Central Office Switching - Digital
9. Central Office Switching - Analog & Electro-mechanical
10. Central Office Switching - Operator Systems
11. Central Office Transmission - Radio Systems
12. Central Office Transmission - Circuit Equipment
13. Information origination/termination - Station apparatus
14. Information origination/termination - Customer premises wiring
15. Information origination/termination - Large private branch exchanges
16. Information origination/termination - Public telephone terminal equipment
17. Information origination/termination - Other terminal equipment
18. Cable and wire facilities - Poles
19. Cable and wire facilities - Aerial cable - Metal
20. Cable and wire facilities - Aerial cable - Fiber
21. Cable and wire facilities - Underground cable - Metal
22. Cable and wire facilities - Underground cable - Fiber
23. Cable and wire facilities - Buried cable - Metal
24. Cable and wire facilities - Buried cable - Fiber
25. Cable and wire facilities - Conduit systems
26. Cable and wire facilities - Other



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Part G: Investments In Affiliated Companies

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.

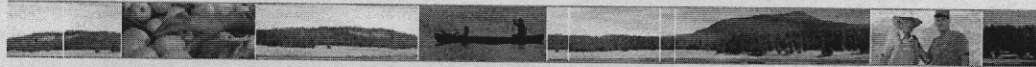
Investments	Current Year Data		Cumulative Investment To Date (d)	Cumulative Data		Current Balance (f)
	Investment This Year (b)	Income/Loss This Year (c)		Cumulative Income/Loss To Date (e)		
(a)						
1. Investment in Affiliated Companies - Rural Development						
2. Investment in Affiliated Companies - Nonrural Development						

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Part F: Funds Invested In Plant During Year

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.

1. RUS, RTB, & FFB Loan Funds Expended
2. Other Long-Term Loan Funds Expended
3. Funds Expended Under RUS Interim Approval
4. Other Short-Term Loan Funds Expended
5. General Funds Expended (Other than Interim)
6. Salvaged Materials
7. Contribution in Aid to Construction
8. Gross Additions to Telecom. Plant (1 thru 7)



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Part E: Toll Data

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.

1. Study Area ID Code(s)

Please use six digit USAC STUDY AREA ID CODE for each separate study area.

Study Area ID Code

2. Types of Toll Settlements (Check one)

Interstate: Average Schedule Cost Basis

Intrastate: Average Schedule Cost Basis

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Part D: System Data

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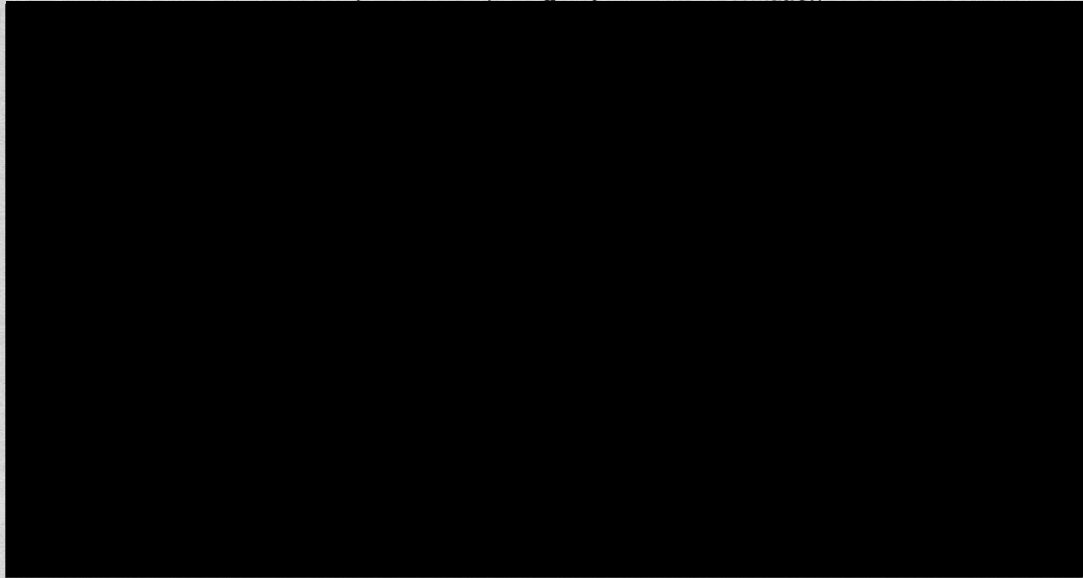
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Part C: Subscriber (Access Line), Route Mile, & High Speed Data Information



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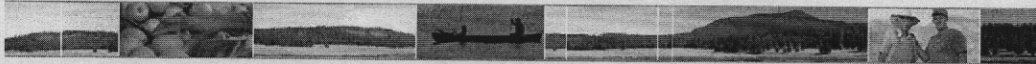
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Part B: Statements of Income and Retained Earnings or Margins

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential. The Prior Year figures have been brought forward from the December 2014 submission and cannot be edited here. If these figures need to be corrected please revise them in that submission and resubmit.

	Item
1.	Local Network Services Revenues
2.	Network Access Services Revenues
3.	Long Distance Network Services Revenues
4.	Carrier Billing and Collection Revenues
5.	Miscellaneous Revenues
6.	Uncollectible Revenues
7.	Net Operating Revenues (1 Thru 5 Less 6)
8.	Plant Specific Operations Expense
9.	Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)
10.	Depreciation Expense
11.	Amortization Expense
12.	Customer Operations Expense
13.	Corporate Operations Expense
14.	Total Operating Expenses (8 Thru 13)
15.	Operating Income or Margins (7 less 14)
16.	Other Operating Income and Expense
17.	State and Local Taxes
18.	Federal Income Taxes
19.	Other Taxes
20.	Total Operating Taxes (17+18+19)
21.	Net Operating Income or Margins (15+16-20)
22.	Interest on Funded Debt
23.	Interest Expense - Capital Leases
24.	Other Interest Expense
25.	Allowance for Funds Used During Construction
26.	Total Fixed Charges (22+23+24-25)
27.	Nonoperating Net Income
28.	Extraordinary Items
29.	Jurisdictional Differences
30.	Nonregulated Net Income
31.	Total Net Income or Margins (21+27+28+29+30-26)
32.	Total Taxes Based on Income
33.	Retained Earnings or Margins Beginning-of-Year
34.	Miscellaneous Credits Year-to-Date
35.	Dividends Declared (Common)
36.	Dividends Declared (Preferred)
37.	Other Debits Year-to-Date
38.	Transfers to Patronage Capital
39.	Retained Earnings or Margins End-Of-Period [(31+33+34)-(35+36+37+38)]
40.	Patronage Capital Beginning-of-Year
41.	Transfers to Patronage Capital
42.	Patronage Capital Credits Retired
43.	Patronage Capital End-Of-Year (40+41-42)
44.	Debt Service Payments for the period(principal interest on long term debt)
45.	Cash Ratio [(14+20-10-11) / 7]

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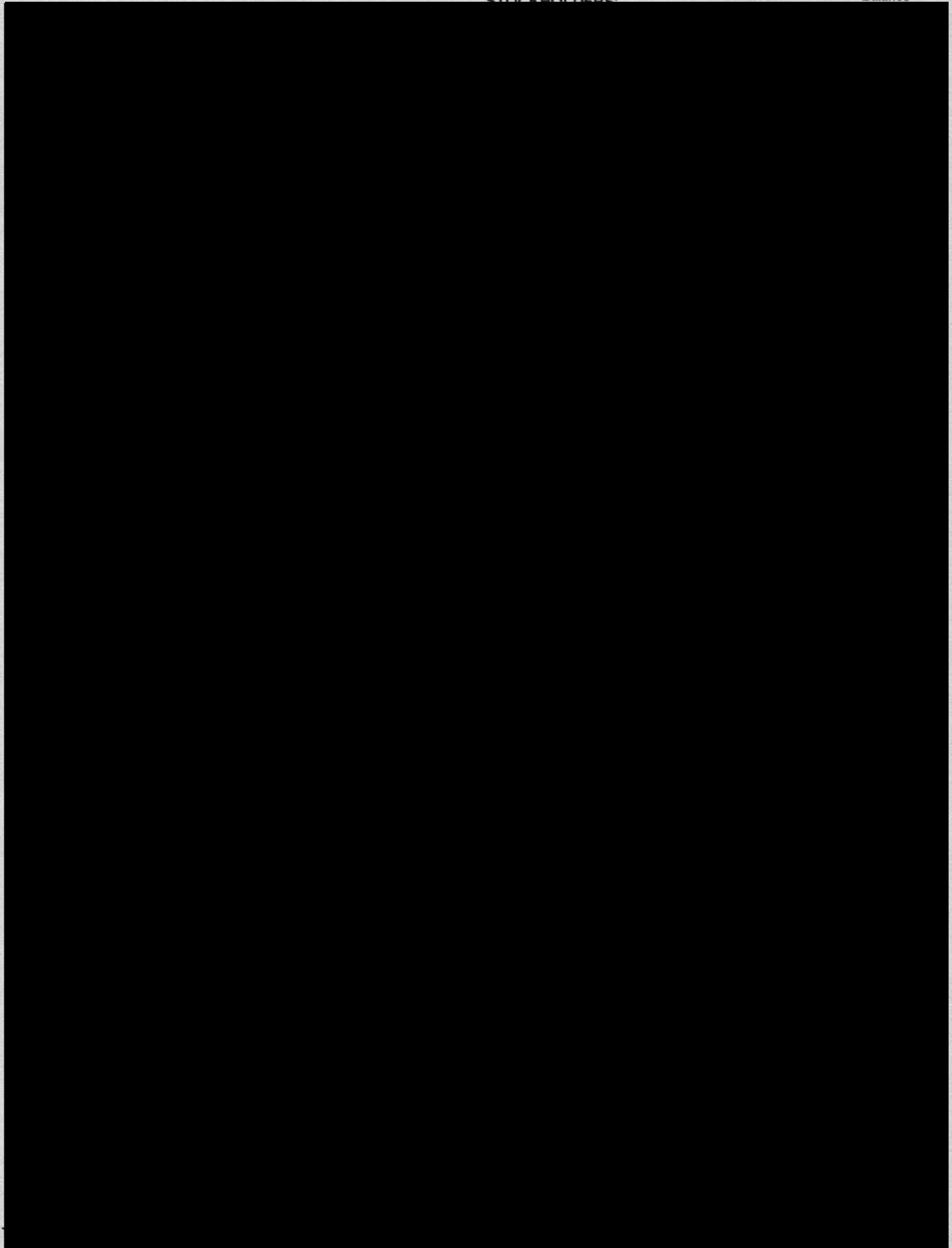
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Part A: Balance Sheet

Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.
The Balance Prior Year figures have been brought forward from the December 2014 submission and cannot be edited here. If these figures need to be corrected please revise them in that submission and resubmit.

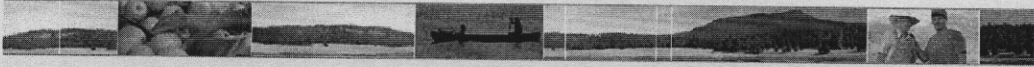
ASSETS	Balance Prior Year	Balance End of Period	LIABILITIES AND STOCKHOLDERS'	Balance	Balance
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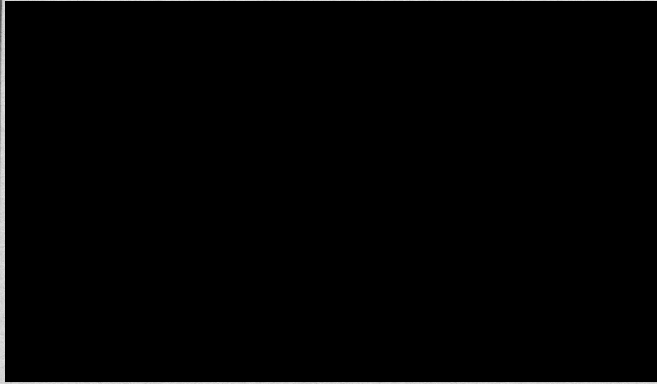
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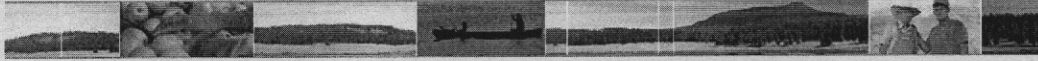
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Borrower Point Of Contact Information

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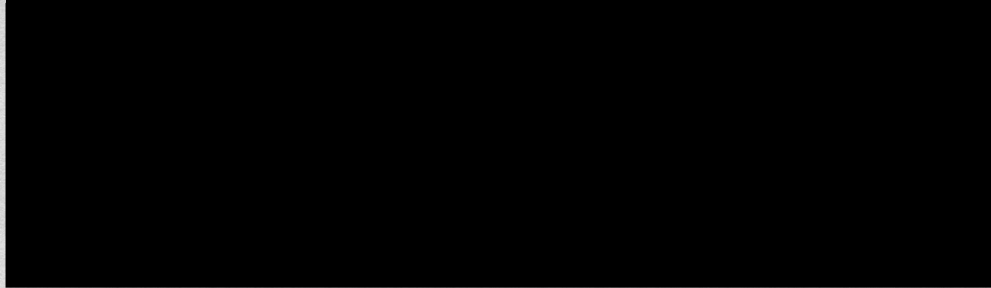
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According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.



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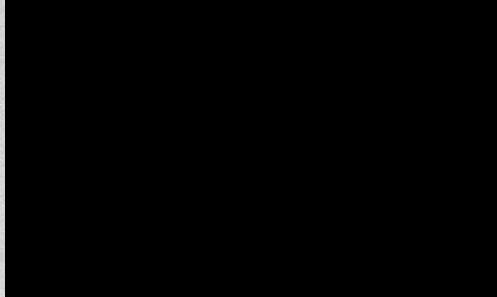
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Operating Report for Telecommunications Borrowers

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