Redacted Version Shaded information is designated as confidential per WAC 480-07-160

Supplement to Declaration Networks Group, Inc. Annual Eligible Telecommunications

Carrier Report for 2022 and Annual Plan

Declaration Networks Group, Inc. ("DNG"), submits this supplement to its Annual Eligible Telecommunications Carrier Report for 2022 ("2022 Report") and Annual Plan in accordance with WAC 480-123-060 through WAC 480-123-080.

I. Requested Revisions

A. Certification of Eligible Telecommunications Carrier as required by WAC 480-123-060(1).

- DNG provided a certification that did not include the correct language under 2. of the verification filed in Exhibit A. The language for 2. should include, "in the coming year (2024)" instead of the following year.
 - Please resubmit the appropriate document as Revised Exhibit A in order to include, "in the coming year (2024)" (ie. include all certifications and verifications for DNG) with that correction along with updated signature and date.

RESPONSE: See Exhibit A.

- B. AC 480-123-080(1) Annual Plan for Universal Service Support Expenditures.
- DNG did not provide the company's planned gross capital expenditures and operating expenses the coming calendar year (2024).
- Provide a new Exhibit (that may be confidential) in order to the report with the planned use of federal support (including investment, expenses, and planned projects) for the coming calendar year (2024).

RESPONSE: See Confidential Exhibit B.

C. WAC 480-123-080(2) – Substantive Plan of the Investments and Expenditures, and how they will benefit customers.

- DNG not provide a substantive plan of the investments and expenditures to be made and a substantive description of how those investment and expenditures will benefit customers.
- Provide a) substantive plan of the investments and expenditures (that may be filed as confidential) to be made with federal support and b) how they will benefit customers.

RESPONSE: Declaration Networks Group, Inc (DNG) was awarded an FCC CAF 2 Award in 2018 to provide broadband access to more than 2,000 specific residential and small business locations in Stevens County, WA. The FCC through USAC provides DNG for a period of 10 years a monthly subsidy amounts equal to 1/120th of the total award amount to be used to for the provision, maintenance and upgrade of DNG's network and operations in support of the designated Stevens County locations. DNG has substantially deployed a broadband network that is currently offering broadband services to more than 70% of the specific locations for the DNG CAF 2 award, which is ahead of the required 40% at the end of 2022, and 60% at the end of 2023 as prescribed by the FCC CAF 2 program requirements.

The construction expenditures will benefit customer by increasing the availability of services in their area. Generally, the DNG Stevens County network consists of more than 20 Towers with Fixed Wireless radios that provide broadband access to more than 21,000 locations. DNG has planned construction activities in Stevens County that additionally includes over 180 miles of fiber route miles that will provide Fiber to the Home (FTTH) service for more than 2,000 locations, as well as additional next generation wireless radio upgrades that will cover more than 36,000 locations. See also Confidential Exhibit B.

Exhibit A

Declaration Networks Group, Inc. ETC Certification 2023

- I, Robert Nichols, am the chief executive officer of Declaration Networks Group, Inc. (the "Company"); that I am authorized to make this Verification on behalf of the Company; and that I certify or declare under penalty of perjury under the laws of the State of Washington that the following is true and correct to the best of my knowledge, information, and belief:
- 1. The Company used all federal universal service high-cost support received in 2023 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
- 2. The Company will use any federal universal service high-cost support received in the coming year (2024) only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
- 3. The Company materially complies with all the requirements of WAC 480-123-070 and WAC 480-123-080. DNG's buildouts in Washington State have far exceeded the required milestones set out by the FCC CAF 2 program as DNG had completed more than seventy percent (70%) of the eligible locations in the State of Washington as of December 31, 2022, at which point 40% build-out was required by the CAF 2 program, and 60% build-out is required by Dec 31, 2023. DNG investment plan for 2023 and 2024 will be consistent with previous years and focused on the provision, maintenance and upgrading of facilities. The capital expenditures will benefit the existing and potential customers with access to reliable broadband services at affordable rates and with the speeds and capacity that allow customers to perform on-line applications including education, streaming entertainment, telehealth, telework and social networking.

DNG will comply with those portions of the CTIA Code which are applicable to fixed wireless services. DNG will also comply with the applicable consumer protection and service quality standards of WAC chapter 480-120.

DNG will have adequate amounts of back-up power to ensure functionality without an 5. external power source, and DNG maintains a redundant network backbone with redundant paths to the internet. Power outage protection is available at all site by means of battery back-up for a minimum of 18 hours. Portable generator hookups are available for extended outage periods.

DNG will advertise the availability of services supported by federal universal service 6. mechanisms including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers currently not receiving discounts in the area where it has an ETC designation. DNG's sales and marketing efforts are focused on addressing the pain points typically experienced with competitors' offerings (i.e., low speeds, high monthly fees, data caps, and spotty service availability) through key messages that highlight our superior service quality, value and support.

Robert Nichols

Sworn and subscribed before me this 22nd day of August, 2023

My commission expires 11/30/2020

Redacted Version

Exhibit B