

UT-220546

**RAINIER**connect

2516 Holgate St | Tacoma, WA 98402 | www.rainierconnect.com

July 20, 2022

**VIA ELECTRONIC FILING SYSTEM**

Ms. Amanda Maxwell, Executive Director & Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Received  
Records Management  
07/21/22 11:22  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

RE: **2023 Petition to Receive USF Support**

Dear Ms. Maxwell:

MASHELL TELECOM, INC. DBA RAINIER CONNECT ("MASHELL"), a privately-held rate of return carrier receiving high cost support, has electronically submitted a 2023 Petition to Receive USF Support to the Commission.

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

Sincerely,

*Danielle Clausen*

Danielle Clausen  
Senior VP of Finance  
Mashell Telecom Inc. dba Rainier Connect Enclosures



**THINK INSIDE THE BOX**  
Business and Residential Communications

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**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

IN RE

PETITION OF MASHELL TELECOM, INC.  
TO RECEIVE SUPPORT FROM THE  
UNIVERSAL SERVICE  
COMMUNICATIONS PROGRAM

DOCKET NO.

PETITION FOR SUPPORT

COMES NOW MASHELL TELECOM, INC. (the "Company") and, pursuant to Chapter 480-123 of the Washington Administrative Code ("WAC"), including, but not limited to, WAC 480-123-110, hereby petitions the Washington Utilities and Transportation Commission (the "Commission") to receive support from the Universal Service Communications Program (the "Program") for the Program year 2023.

**I. Demonstration of Eligibility under WAC 480-123-100**

1. WAC 480-123-100(1)(a): The Company is a local exchange company as defined in WAC 480-120-021 that serves fewer than forty thousand access lines within the state.
2. WAC 480-123-100(1)(b): The Company is an incumbent local exchange carrier as defined in 47 U.S.C. Sec. 251(h) or has been designated as an incumbent local exchange carrier by

1 the Federal Communications Commission.

2 3. WAC 480-123-100(1)(c): The Company offers basic residential and business exchange  
3 telecommunications services as set forth in WAC 480-120-021 and RCW 80.36.630.

4 4. WAC 480-123-100(1)(d): The Company has established a plan, as described in WAC 480-  
5 123-110, to provide, maintain or enhance broadband service (See II.4, below).

6 5. WAC 480-123-100(1)(e): The Company has been designated by the Commission as an  
7 eligible telecommunications carrier ("ETC") for purposes of receiving federal universal  
8 services support pursuant to 47 C.F.R. Part 54 Subpart D - Universal Service Support for  
9 High Cost Areas with respect to the service areas for which the Company is seeking  
10 Program support.

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12 **II. Demonstration of Eligibility under WAC 480-123-110**

13 1. WAC 480-123-110(1)(a): The name of the legal entity that provides communications  
14 services and is seeking Program support is as follows: Mashell Telecom, Inc. [d/b/a Rainier  
15 Connect].

16 2. WAC 480-123-110(1)(b): A corporate organization chart showing the relationship between  
17 the Company and affiliates as defined in RCW 80.16.010 is attached hereto as Exhibit 1. <sup>1</sup>  
18 A detailed description of any transactions between the Company and the affiliates named in  
19 Exhibit 1 recorded in the Company's operating accounts is attached hereto as Exhibit 2. <sup>2</sup>

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<sup>1</sup> Pursuant to agreement with Commission Staff, Exhibit 1 is limited to those affiliates having transactions  
24 with the Company that are to be identified in Exhibit 2.

25 <sup>2</sup> Pursuant to agreement with the Commission Staff, Exhibit 2 is limited to transactions other than  
26 employment compensation and benefits pursuant to employ benefit plans.

- 1 3. WAC 480-123-110(1)(c): A service area map for the Company can be found at Sheet No.  
2 Fifth Revised Sheets No. 105 and Original Sheet No. 105.1 of the Company's Tariff WN U-  
3 3.
- 4 4. WAC 480-123-110(1)(d): The Company's broadband plan to provide, maintain, or enhance  
5 broadband services in its service area is attached hereto as Exhibit 3.
- 6 5. WAC 480-123-110(1)(f): A sworn statement by a Company officer certifying that the  
7 Company complies with state and federal accounting, cost allocation, and cost adjustment  
8 rules pertaining to incumbent local exchange carriers is attached as Exhibit 4.
- 9 6. WAC 480-123-110(1)(g): The number of residential local exchange access lines served by  
10 the Company as of December 31, 2021, was 372. The number of residential local exchange  
11 access lines served by the Company as of December 31, 2020, was 401. The number of  
12 business local exchange access lines served by the Company as of December 31, 2021, was  
13 304. The number of business local exchange access lines served by the Company as of  
14 December 31, 2020, was 312. The number of broadband connections served by the  
15 Company as of December 31, 2021, was 2,735. The number of broadband connections  
16 served by the Company as of December 31, 2020, was 2,433. Of the approximately 4,427  
17 serviceable locations the Company has, roughly 2,735 are capable of broadband speeds of  
18 25 Mbps downstream / 3 Mbps upstream, or better. The unbundled monthly recurring rate  
19 charged by the Company for residential local exchange access service on December 31,  
20 2021, was \$18.00. The unbundled monthly recurring rate charged by the Company for  
21 residential local exchange access service on December 31, 2020, was \$18.00. The  
22 unbundled monthly rate charged by the Company for single line business local exchange  
23 access service on December 31, 2021, was \$24.00. The unbundled monthly rate charged by  
24 the Company for single line business local exchange access service on December 31, 2020,  
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1 was \$24.00. (The Company has other business local exchange service rates, but the  
2 Company understands that WAC 480-123-110(1)(g) is requesting the single line business  
3 local exchange access service rate.) The unbundled monthly rate charged for broadband  
4 service as of December 31, 2021, and as of December 31, 2020, is set out in the attached  
5 Exhibit 5.

- 6 7. WAC 480-123-110(1)(h): The requested statements are attached as Exhibit 6.
- 7 8. WAC 480-123-110(1)(h)(i): A sworn statement by a Company officer certifying that the  
8 Company is in compliance with the Federal Communications Commission's obligation for  
9 deployment of broadband at speeds specified by the Federal Communications Commission  
10 applicable to the Company and that the Company meets one of the eligibility criteria set out  
11 in WAC 480-123-110(1)(j)(ii), (iii) or (iv) is attached at Exhibit 7.
- 12 9. All exhibits attached hereto are incorporated into this Petition as though fully set forth.


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14  
15 Respectfully submitted this 20<sup>th</sup> day of July, 2022.

16 MASHELL TELECOM, INC.  
17 d/b/a RAINIER CONNECT

18 By   
19 Brian Haynes, President

CERTIFICATION

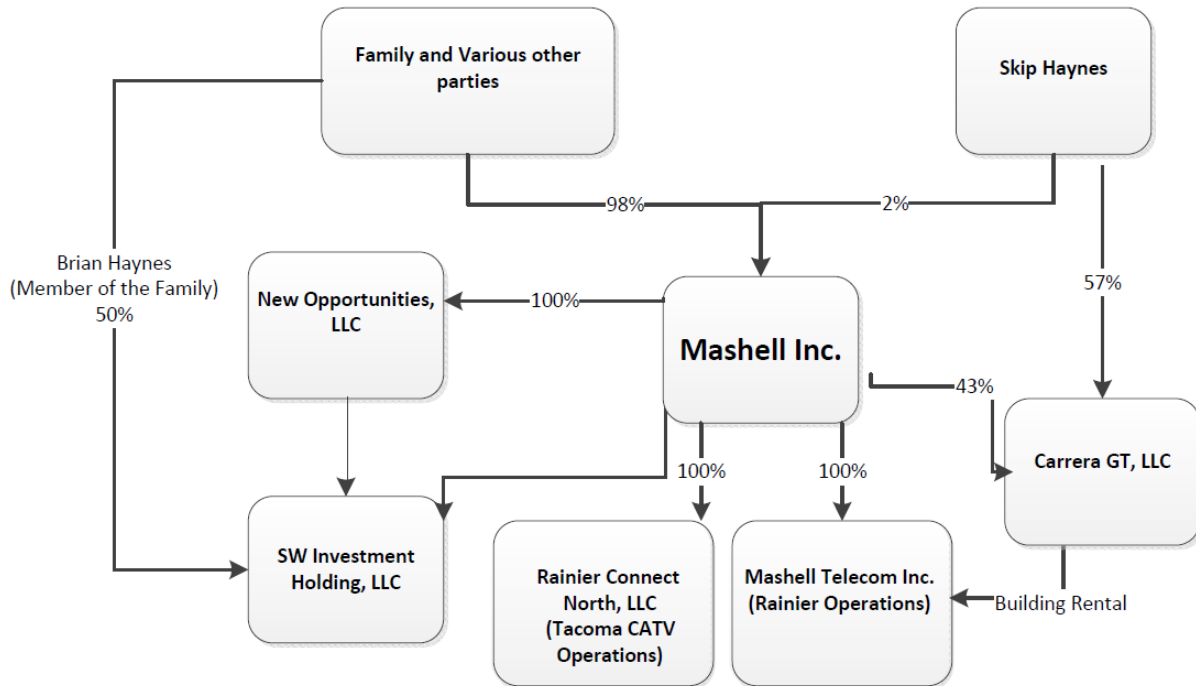
I, Brian Haynes, an officer of the Company that is responsible for the Company's business and financial operations, hereby certify under penalty of perjury that the information and representations set forth in the Petition, above, are accurate and the Company has not knowingly withheld any information required to be provided to the Commission pursuant to the rules governing the Program.



Brian Haynes, President

EXHIBIT 1

CORPORATE ORGANIZATION CHART



## **EXHIBIT 2**

### **AFFILIATED TRANSACTIONS**

Mashell Telecom, Inc. rents office space, utilized as corporate headquarters and network operations center, from its affiliate, Carrera GT, LLC. This leased property facilitates both the ILEC and CLEC operations of the business and is appropriately allocated between regulated and nonregulated operations using Part 64 factors and recorded in account 6121.0, Land & Building Expense-Rents.

The Company has a management agreement with Rainier Connect North (RCN) to provide support to RCN's entire subscriber base. This agreement applies only to CLEC operations and all associated expenses and revenue are properly allocated to nonregulated operations.



### **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 \$6 million 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 during the pandemic while schools are physically closed. In addition, 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 62% of serviceable locations. The company's five-year investment plan provides for capital expenditures to expand our FTTP network annually to service an additional thirty three percent of our customer base that currently has service speeds below 25/3Mbps. The Company

goal is to have ninety five percent of our network capable of 25/3Mbps speeds by 2025, with sixty seven percent in 2022 and seventy two percent in 2023.

Approximately 5% of subscribers on the network are not eligible for FTTP due to cost constraints. For these customers, Mashell Telecom, Inc. plans to place remote terminals strategically in order to shorten and groom copper loops and begin offering higher data rates in areas that were previously limited by loop distance. We have not engineered this project and do not have a current timeline on implementation.

The foregoing Broadband Plan was adopted by Mashell Telecom, Inc. on July 1st, 2022.

## 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.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 20<sup>th</sup> day of July, 2022.

  
\_\_\_\_\_  
Brian Haynes / President and CEO

## EXHIBIT 5

### BROADBAND SERVICE RATES

#### FIBER

Residential 20MB/20MB	\$40.00
Residential 100MB/100MB	\$80.00
Residential 1GB/1GB	\$100.00
Business 50MB/25MB	\$99.95
Business 150MB/75MB	\$169.95
Business 500MB/250MB	\$349.99

#### DSL

Business-1.5MB/1.5MB	\$19.63
Business-6MB/512K	\$19.63
Business-12MB/1MB	\$29.63
Business-20MB/1MB	\$36.63
Residential-1.5MB/1.5KB	\$68.95
Residential-512KB/512KB	\$68.95
Residential-6MB/512K	\$68.95
Residential-12MB/1MB	\$75.95
Residential-20MB/1MB	\$86.95

#### CABLE MODEM

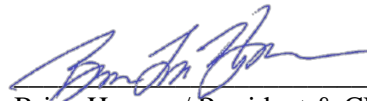
Business 30MB/10MB	\$66.95
Business 55MB/20MB	\$76.95
Business 150MB/20MB	\$99.95
Business 250MB/20MB	\$120.95
Business 500MB/20MB	\$140.95
Business 1GB/20MB	\$180.95
Residential 30MB/10MB	\$29.95
Residential 55MB/20MB	\$34.95
Residential 150MB/20MB	\$44.95
Residential 250MB/20MB	\$59.95
Residential 500MB/20MB	\$69.95
Residential 1GB/20MB	\$79.95

**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) under penalty of perjury, hereby certify 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 2023 which the company is applying for support from the program.

Dated this 20<sup>th</sup> day of July 2022.



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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.

This Certification is a sworn statement made under the penalty of perjury as set forth in RCW 9A.72.085 and is made this 20<sup>th</sup> day of July, 2022.

  
\_\_\_\_\_  
Brian Haynes / President & CEO