

**CONFIDENTIAL FILING**

June 21, 2017

**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

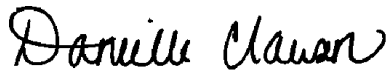


**THINK INSIDE THE BOX**  
Business and Residential Communications

“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	2018
<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



**(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
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2018
<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

<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	
<015>	Study Area Name	MASHELL TELECOM INC	
<020>	Program Year	2018	
<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	
<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	0 . 0	
<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

<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2018
<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
<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	
<515>	Certify compliance with applicable minimum service standards	

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2018
<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

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2018
<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

<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 PDF, 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

<b>(1000) Voice and Broadband Service Rate Comparability Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	522431
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<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

<1000>      Voice services rate comparability certification      Yes

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

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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

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Name of Attached Document

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

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

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<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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<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.

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

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

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

July 2013

<010>	Study Area Code	522431
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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**

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three 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.
- <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 three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only. Name of Attached Document Listing Required Information
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013). Name of Attached Document Listing Required Information
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)



**(2005) 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

**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?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<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)(1)(ii)(A)

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)(1)(ii)(C)



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

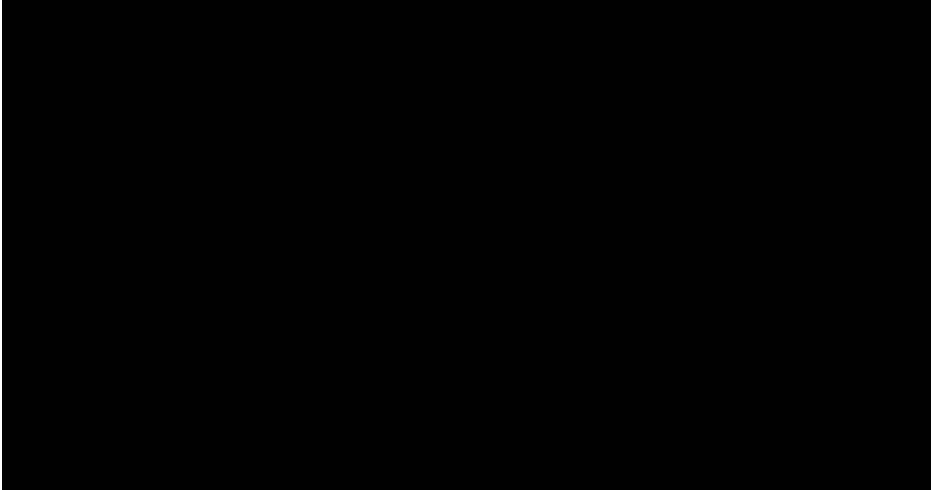
FCC Form 481

Data Collection Form

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

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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

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**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

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**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

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**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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<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

**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 06/21/2017
Printed name of Authorized Officer:	Brian Haynes
Title or position of Authorized Officer:	President/CEO
Telephone number of Authorized Officer:	3608324130 ext.
Study Area Code of Reporting Carrier:	522431 Filing Due Date for this form: 07/03/2017
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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<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

**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









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](http://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 \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. Company’s current total residential local end-user rate<sup>1</sup> 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.<sup>2</sup>

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

<sup>2</sup> 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

### Certification of Public Interest Obligations

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 10 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.

Response Line 3010  
Mashell Telecom, Inc.  
Study Area 522431

### Certification of Public Interest Obligations

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 10 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.





**NAVIGATION**

**Reports**

- [Op. Report-Telecom Certification Point Of Contact](#)
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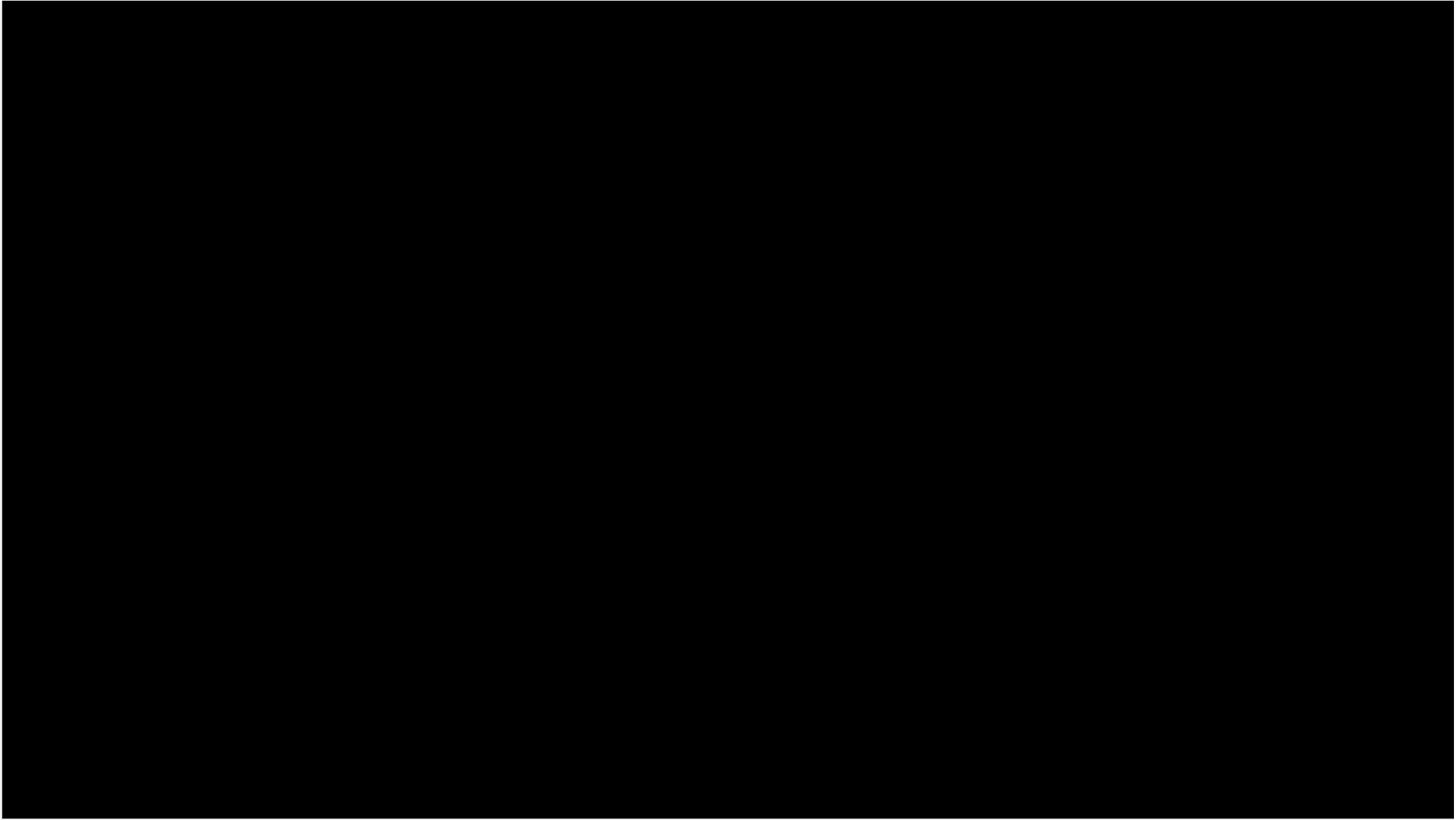
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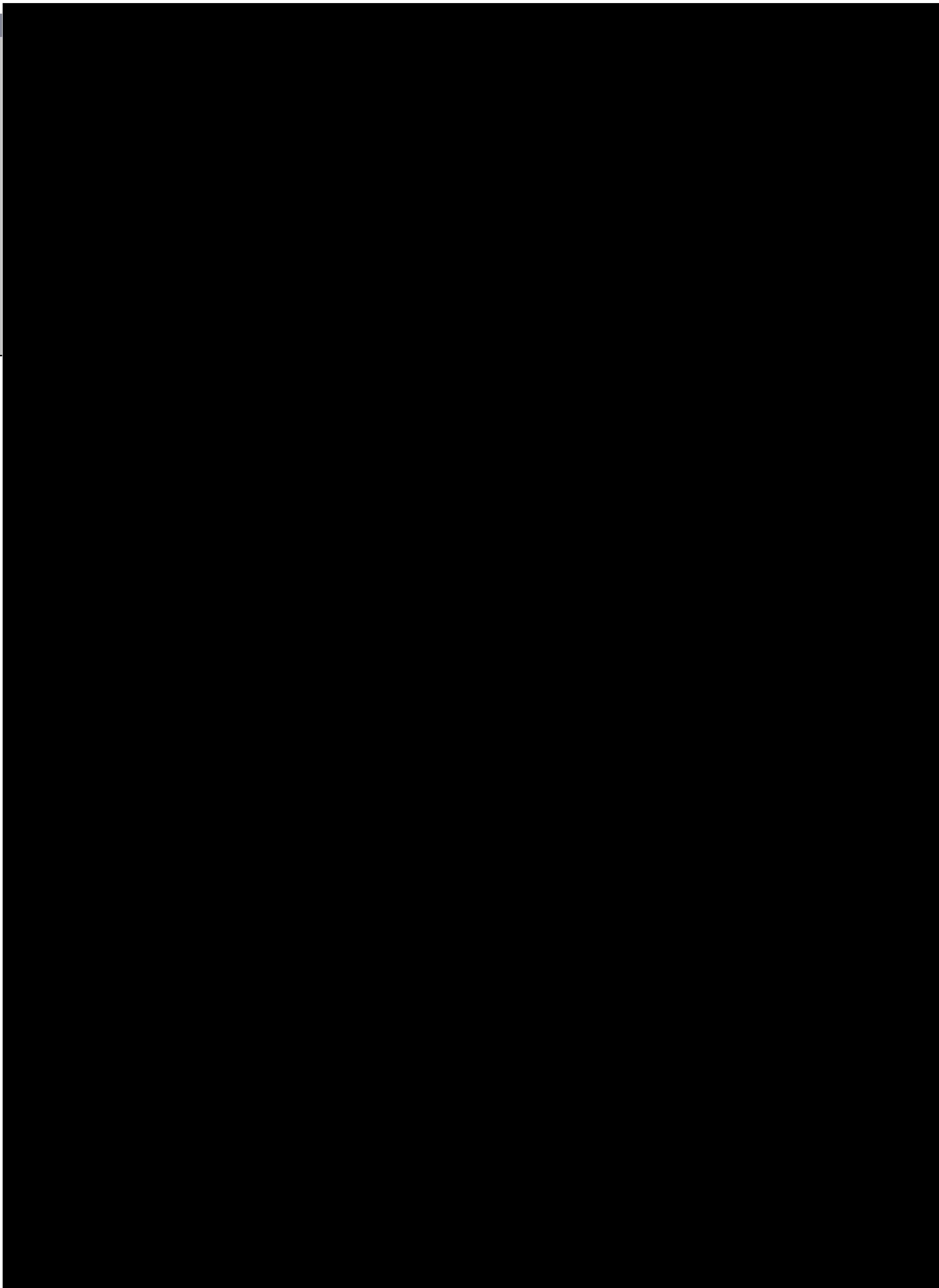


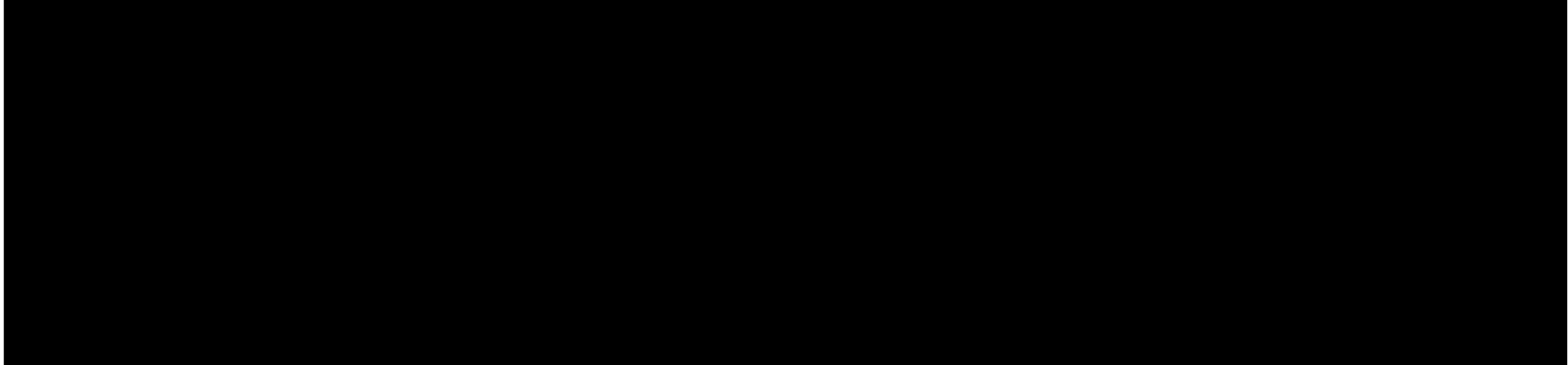
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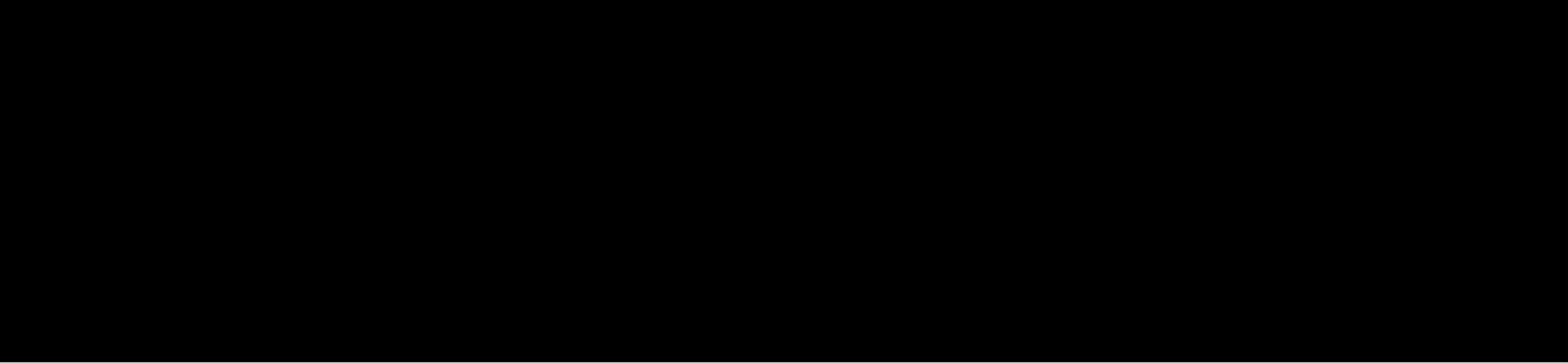




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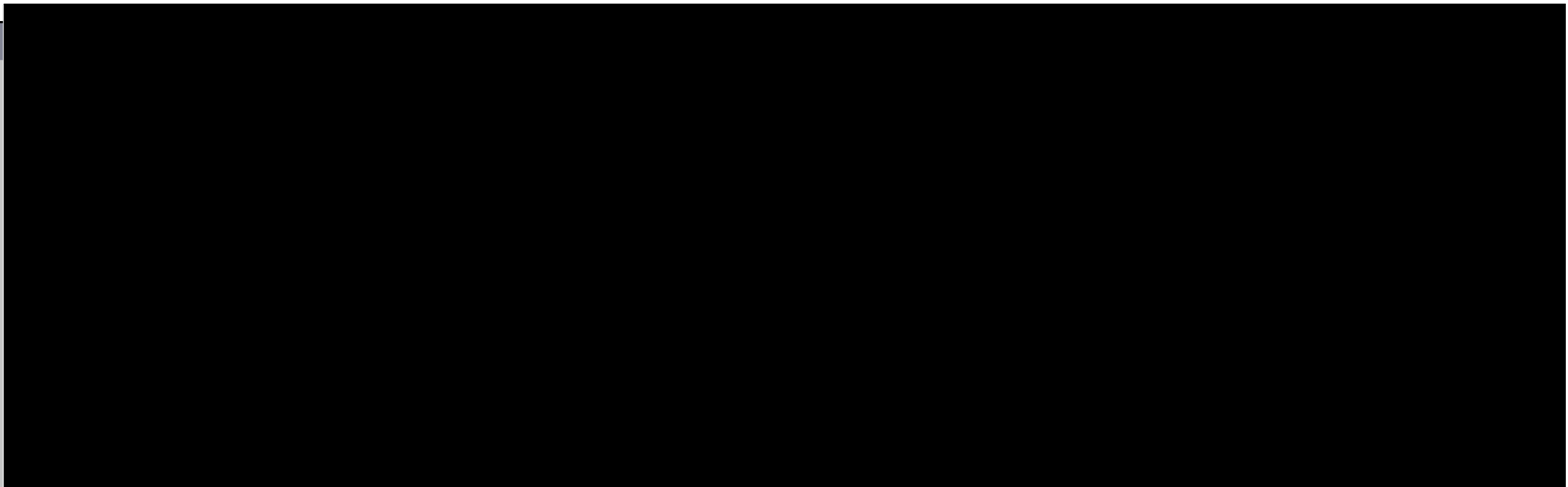
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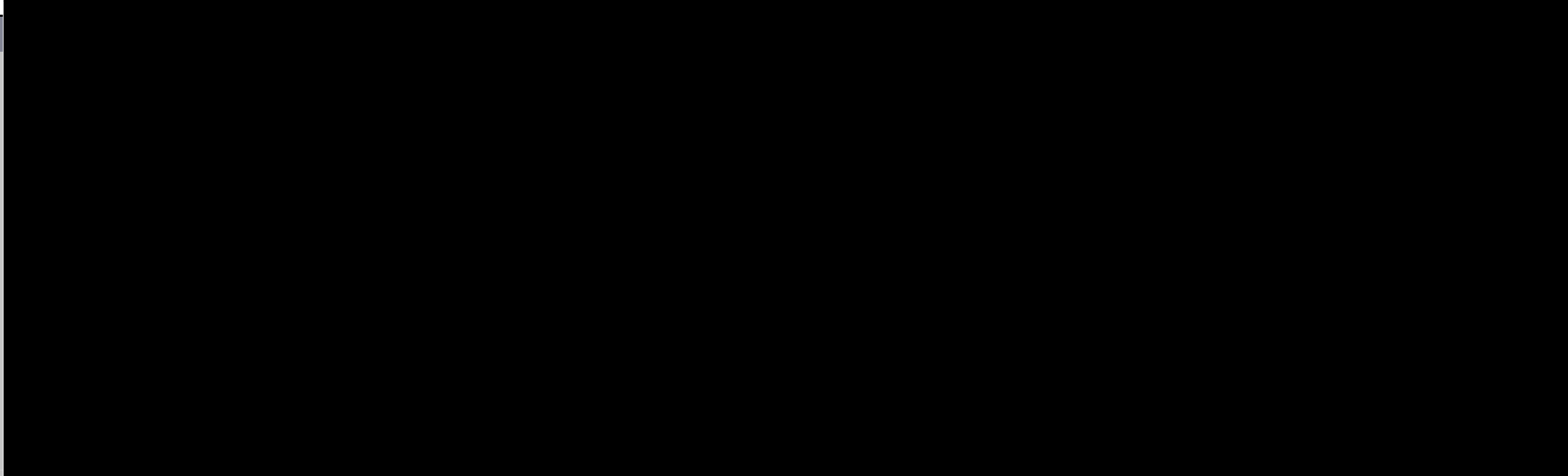
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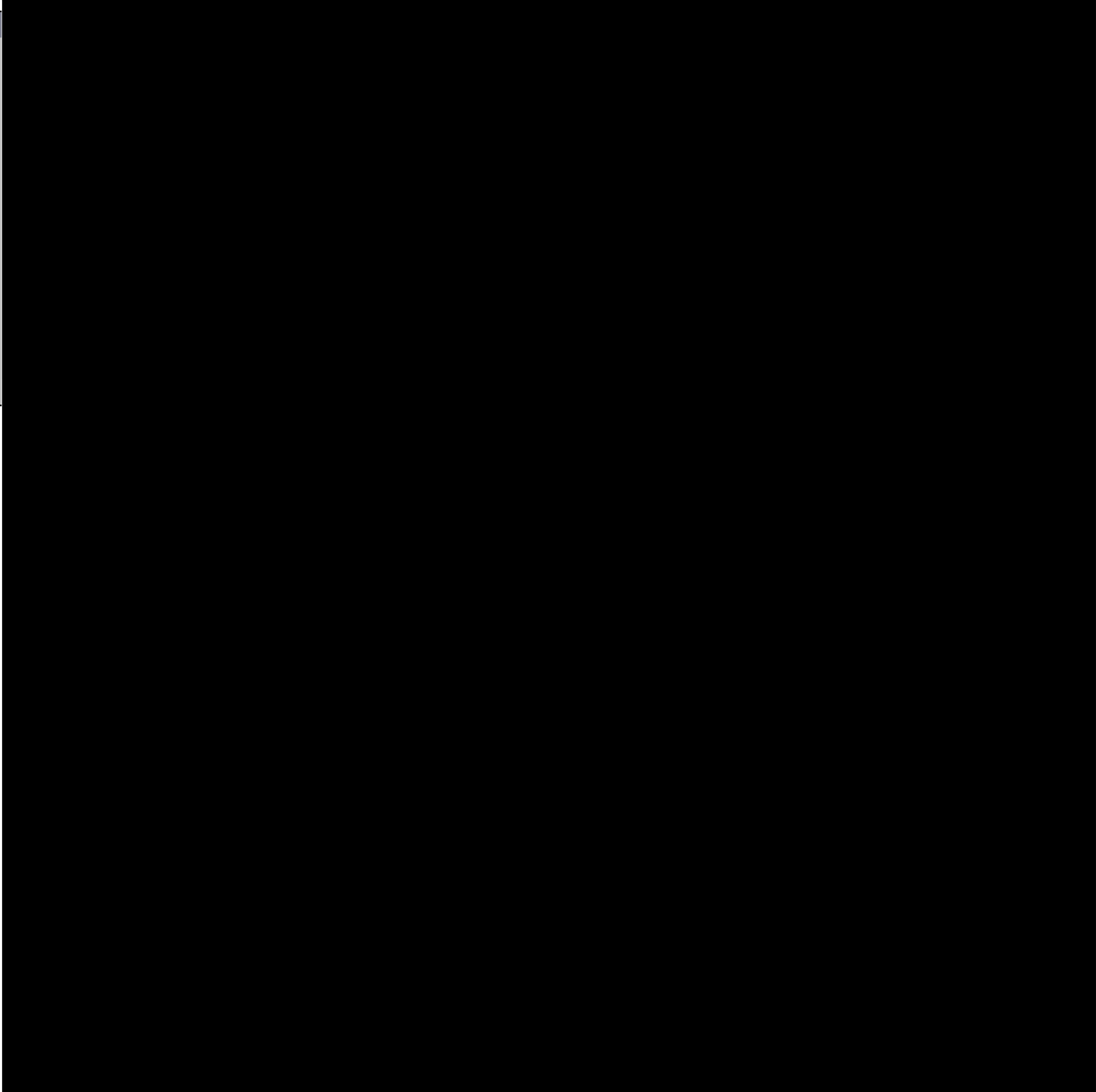
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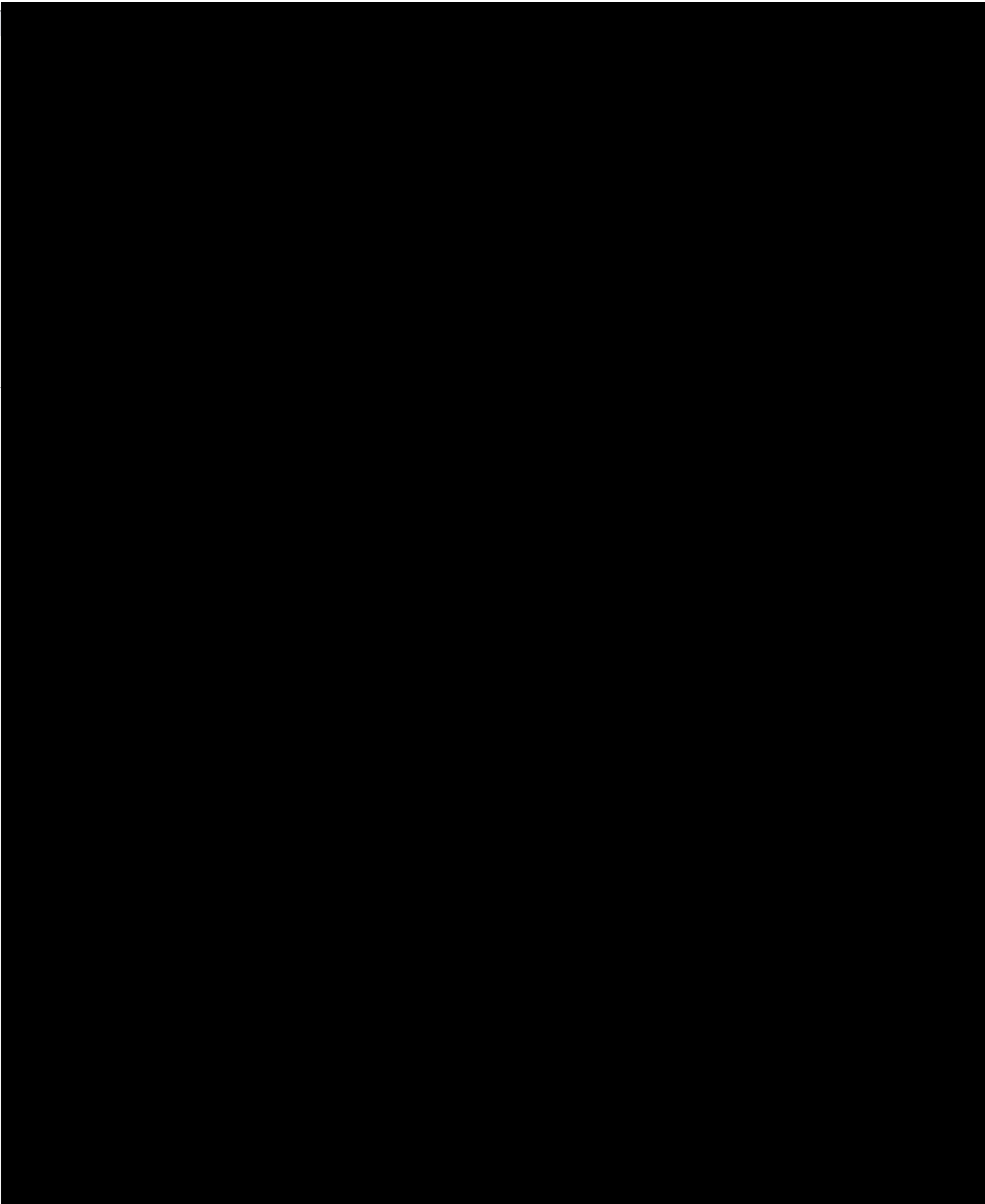
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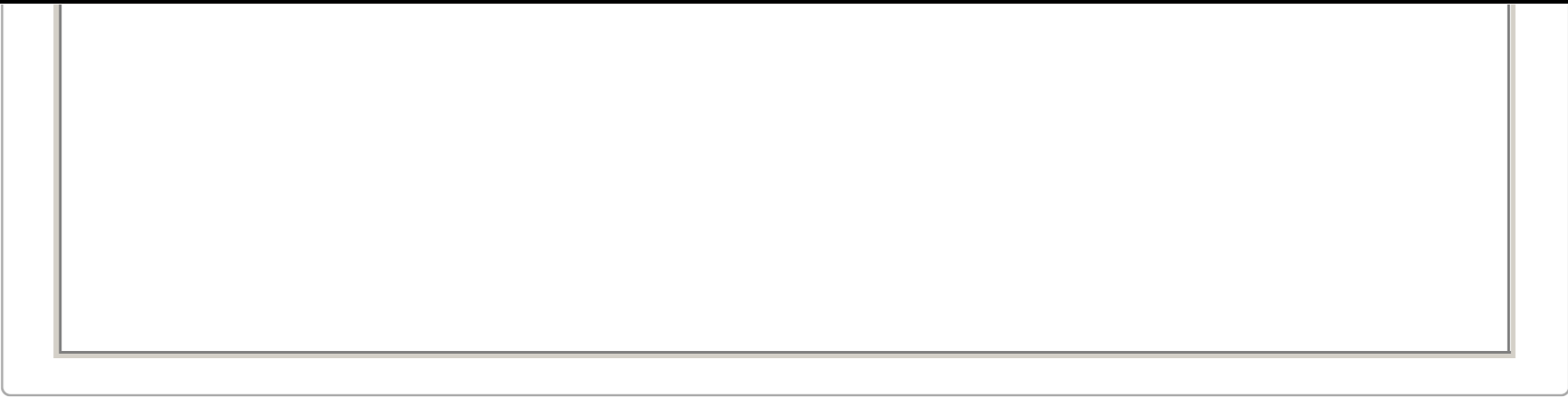
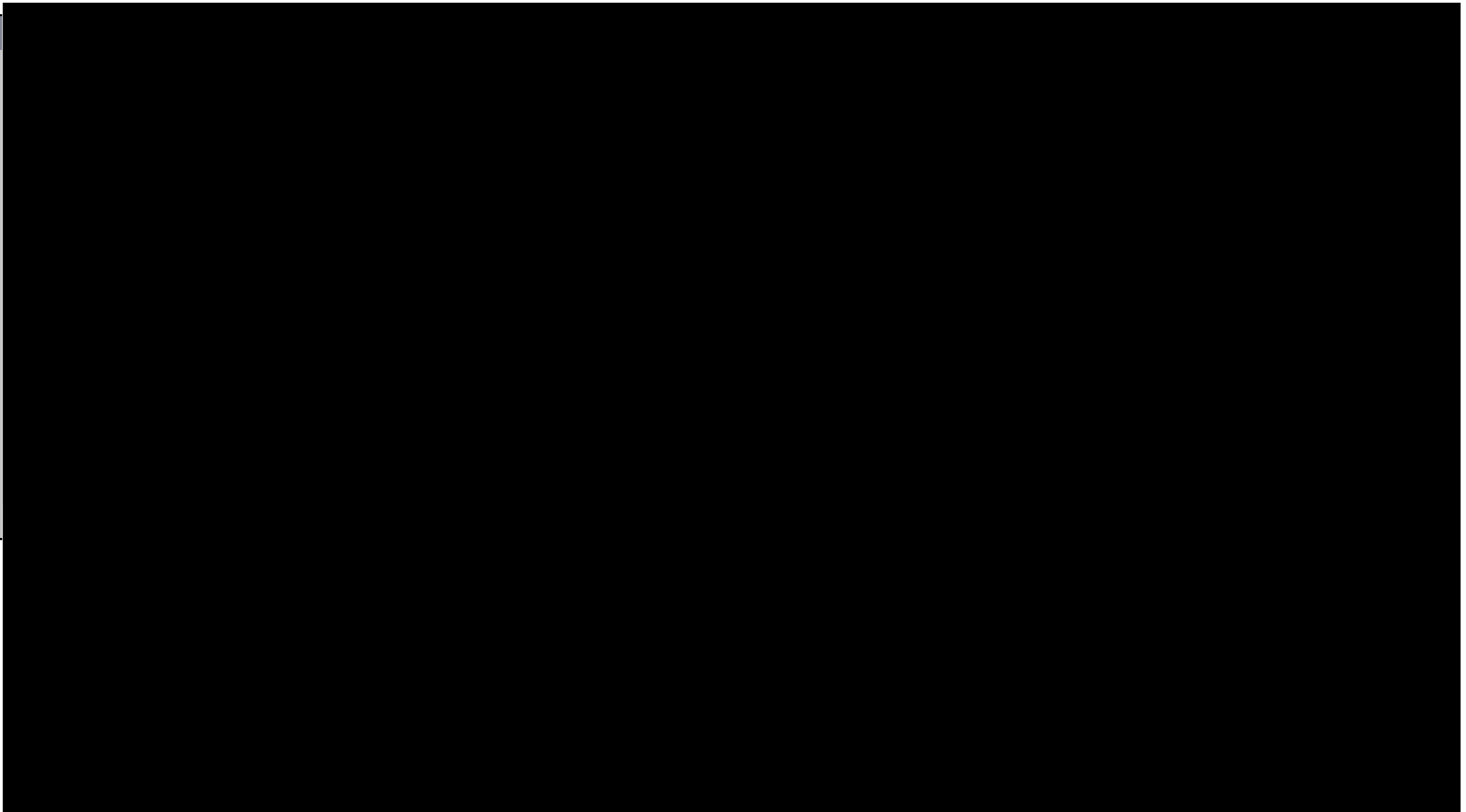




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