

CONFIDENTIAL FILING

June 29, 2020

VIA E-FILING

Mr. Mark Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
06/30/20 13:26
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: UT-190634 – 2020 Compliance Pursuant to WAC 480-123-130

Dear Mr. Johnson:

Pursuant to WAC 480-123-130, Mashell Telecom, Inc. (“Company”) hereby files the attached under UT-Docket.

The Company, by its authorized representative, respectfully submits confidential information in compliance with WAC 480-07-160. Mashell Telecom, Inc. requests confidential treatment of certain information submitted with its reporting requirements as a privately-held rate of return carrier. The confidential information is required by WAC 480-123-130 and includes detailed investment information that is competitively sensitive. Disclosure of this confidential information would have a substantial negative impact on the Company. 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 “CONFIDENTIAL PER WAC 480-07-160”.

If there are any questions concerning the foregoing, please contact the undersigned at 360-832-4130.

Sincerely,

Danielle Clausen

Danielle Clausen
Enclosures

REPORT OF MASHELL TELECOM, INC. COMPANY UNDER THE
WASHINGTON UNIVERSAL COMMUNICATIONS SERVICES PROGRAM
IN COMPLIANCE WITH WAC 480-123-130

July 1, 2020

Docket No. UT-190634

File electronically

1. WAC 480-123-130(1)(a) - Access Lines Served [NECA 1.3 working loops]

	January 1, 2019	December 31, 2019
Residential	432	408
Business	648	500

2. WAC 480-123-130(1)(b) - Use of Support

The funds received by the Company from the universal communications services program in calendar year 2019 represent monies that the Company formerly received through the Washington Exchange Carrier Association (WECA) pooling process and the reduction of support under the Federal Communications Commission's (FCC's) Connect America Fund InterCarrier Compensation Fund (CAF ICC) program. As such, the funds from the universal communications services program contributed to defrayal of the ongoing operation and maintenance expenses of the Company. The funds from the universal communication services program are contributing to the Company's ongoing provision of high-quality basic telecommunications service to customers residing in the area the Company serves.

In December 2019, the Company received \$234,724 from the universal communications services program for the fiscal year ending June 30, 2020.

During the first six months of 2020, the Company invested more than \$200K in new equipment upgrades to improve and expand broadband services to subscribers. We are constantly working to identify gaps in service, gather service location data and quality of service complaints, and develop strategic planning for plant maintenance and 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. The funds received from the universal communications services program can be viewed as contributing to the Company's ability to perform that project, including, without limitation, the repayment of loan funds.

In the second half of 2020 the Company plans to invest an additional \$300K in equipment and outside plant infrastructure in communities to further drive network upgrades facilitating modern voice, multimedia, and broadband services in the rural areas of Eatonville and Kapowsin.

3. WAC 480-123-130(1)(c) - Unfilled Consumer Requests for New Basic Telecommunications Service*

None

* Service requests that are ongoing but still within normal processing times are not counted as unfulfilled.

4. WAC 480-123-130(1)(e) - FCC Form 477

This form was previously filed on or about March 1, 2020 under Docket UT-200002.

5. WAC 480-123-130(1)(f) - Report on Operational Efficiencies/Business Plan Modifications

The Company continually reviews its operations to determine if efficiencies can be achieved. The Company already has a plan in place to concentrate on improving broadband service while continuing to provide high-quality basic telecommunications service to the customers that are located within the area that the Company serves. The funds received from the universal communications services program can be viewed as assisting in the Company's efforts to obtain operational efficiencies.

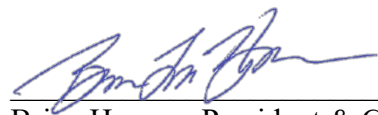
6. WAC 480-123-130(1)(g) and (h) - Other information

N/A

Certified Statement as required by WAC 480-123-130(1)(d):

I, Brian Haynes, am an officer of Mashell Telecom, Inc., and upon personal knowledge and with responsibility therefor, hereby certify under penalty of perjury, that Mashell Telecom, Inc. materially complied with Commission rules under Chapter 480-120 WAC that are applicable to the Company and its provision of service within the area for which the Company received universal communications services program support.

Signed at Tacoma, Washington this 29th day of June, 2020.


Brian Haynes, President & CEO