

**CONFIDENTIAL FILING**

June 26, 2015

**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**

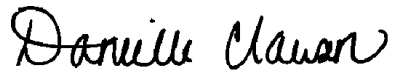
Business and Residential Communications

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

|  |                                     |
|--|-------------------------------------|
| <010> Study Area Code  | 522431                              |
| <015> Study Area Name  | MASHELL TELECOM INC                 |
| <020> Program Year   | 2016                                |
| <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 |

| ANNUAL REPORTING FOR ALL CARRIERS | 54.313<br>Completion<br>Required | 54.422<br>Completion<br>Required |
|-----------------------------------|----------------------------------|----------------------------------|
|-----------------------------------|----------------------------------|----------------------------------|

|   |  |                                     | (check box when complete)           |                                     |
|---|--|-------------------------------------|-------------------------------------|-------------------------------------|
| <100> Service Quality Improvement Reporting   | (complete attached worksheet)                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <200> Outage Reporting (voice)  | (complete attached worksheet)                                  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <210> <input checked="" type="checkbox"/> <-- check box if no outages to report                         |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <300> Unfulfilled Service Requests (voice)  | <input type="text" value="0"/>                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <310> Detail on Attempts (voice)  | <input type="text" value=""/><br>(attach descriptive document) | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <320> Unfulfilled Service Requests (broadband)  | <input type="text" value="0"/>                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <330> Detail on Attempts (broadband)  | <input type="text" value=""/><br>(attach descriptive document) | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <400> Number of Complaints per 1,000 customers (voice)  |  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <410> Fixed   | <input type="text" value="0.0"/>                               | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <420> Mobile  | <input type="text" value="0.0"/>                               | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <430> Number of Complaints per 1,000 customers (broadband)  |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <440> Fixed   | <input type="text" value="3.8E-4"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <450> Mobile  | <input type="text" value="0.0"/>                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <500> Service Quality Standards & Consumer Protection Rules Compliance                                  | (check to indicate certification)                              | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <510> <input type="text" value="522431wa510.pdf"/><br>(attached descriptive document)                   |  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <600> Functionality in Emergency Situations   | (check to indicate certification)                              | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <610> <input type="text" value="522431wa610.pdf"/><br>(attached descriptive document)                   |  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <700> Company Price Offerings (voice)   | (complete attached worksheet)                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <710> Company Price Offerings (broadband)   | (complete attached worksheet)                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <800> Operating Companies and Affiliates  | (complete attached worksheet)                                  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| <900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>               | (if yes, complete attached worksheet)                          | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1000> Voice Services Rate Comparability Certification  | <input type="text" value="Yes"/>                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1010> <input type="text" value="522431wa1010.pdf"/><br>(attach descriptive document)                   |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1100> <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification) |  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1110>  | (complete attached worksheet)                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| <1200> Terms and Condition for Lifeline Customers   | (complete attached worksheet)                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

|  |                                   |                          |                          |                          |
|--|-----------------------------------|--------------------------|--------------------------|--------------------------|
| <2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers | (check to indicate certification) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <2005>   | (complete attached worksheet)     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

|        |                                   |                                     |                          |                          |
|--------|-----------------------------------|-------------------------------------|--------------------------|--------------------------|
| <3000> | (check to indicate certification) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <3005> | (complete attached worksheet)     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**(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 2016  
\_\_\_\_\_  
<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  
<111> year plan" filed with the FCC? (yes / no)    
\_\_\_\_\_

If your answer to Line <111> is yes, then you are required to 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.

522431wa100.pdf

<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.

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

|     |
|-----|
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |
| Yes |

**(200) Service Outage Reporting (Voice)**  
**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 2016  
<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

| <220> | <a>                         | <b1>                 | <b2>                 | <b3>               | <b4>               | <c1>                            | <c2>                         | <d>                                      | <e>   | <f>   | <g>                          | <h>                        |
|-------|-----------------------------|----------------------|----------------------|--------------------|--------------------|---------------------------------|------------------------------|--|---|---|------------------------------|----------------------------|
|       | NORS<br>Reference<br>Number | Outage Start<br>Date | Outage Start<br>Time | Outage End<br>Date | Outage End<br>Time | Number of<br>Customers Affected | Total Number of<br>Customers | 911 Facilities<br>Affected<br>(Yes / No) | Service Outage<br>Description (Check<br>all that apply) | Did This Outage<br>Affect Multiple<br>Study Areas<br>(Yes / No) | Service Outage<br>Resolution | Preventative<br>Procedures |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |
|       |                             |                      |                      |                    |                    |                                 |                              |  |   |   |                              |                            |









|   |                                     |
|---|-------------------------------------|
| <010> Study Area Code   | 522431                              |
| <015> Study Area Name   | MASHELL TELECOM INC                 |
| <020> Program Year  | 2016                                |
| <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 |

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

<920> Tribal Government Engagement Obligation

<921>

- <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.

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**(1100) No Terrestrial Backhaul 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  | 2016                                |
| <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 |

<1130>

**(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

|       |   |                                     |
|-------|---|-------------------------------------|
| <010> | Study Area Code   | 522431                              |
| <015> | Study Area Name   | MASHELL TELECOM INC                 |
| <020> | Program Year  | 2016                                |
| <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 |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP <http://www.rainierconnect.com/legal-notices-tariffs>

- <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**

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                              |
| <015> | Study Area Name   | MASHELL TELECOM INC                 |
| <020> | Program Year  | 2016                                |
| <030> | Contact Name - Person USAC should contact regarding this data                 | Danielle Clausen                    |
| <035> | Contact Telephone Number - Number of person identified in data line <030>     | 306324130 ext.                      |
| <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 Connect America Phase I support, frozen 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}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}

|  |
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|  |

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

|  |
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**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)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020>

|  |
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|  |

- <2021> Interim Progress Community Anchor Institutions

|  |
|--|
|  |
|--|

|   |                                     |
|---|-------------------------------------|
| <010> Study Area Code   | 522431                              |
| <015> Study Area Name   | MASHELL TELECOM INC                 |
| <020> Program Year  | 2016                                |
| <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 |

CHECK the boxes below to note compliance on its 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.

522431wa3010.pdf

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011)

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  
(3014) If yes, does your company file the RUS annual report

(Yes/No)    
(Yes/No)

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

(3017) If the response is yes on line 3014, attach your company's RUS annual  
report and all required documentation

522431wa3017.pdf

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

(3020)

(3021)

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

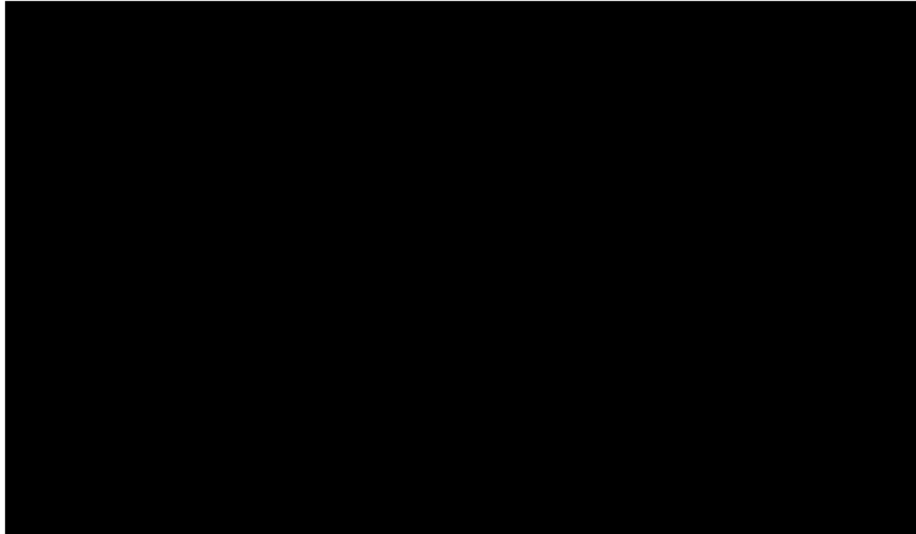
(3024) Underlying information subjected to an officer certification.

(3025)

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

|   |                                     |
|---|-------------------------------------|
| <010> Study Area Code   | 522431                              |
| <015> Study Area Name   | MASHELL TELECOM INC                 |
| <020> Program Year  | 2016                                |
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| <039> Contact Email Address - Email Address of person identified in data line <030> | danielle.clausen@rainierconnect.net |



**Certification - Reporting Carrier  
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  | 2016                                |
| <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 |

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

|   |   |
|---|---|
| <b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>   |   |
| 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<br>Date 06/25/2015                 |
| 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<br>Filing Due Date for this form: 07/01/2015 |
| 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

|   |                                     |
|---|-------------------------------------|
| <010> Study Area Code   | 522431                              |
| <015> Study Area Name   | MASHELL TELECOM INC                 |
| <020> Program Year  | 2016                                |
| <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 |

**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 or Employee of Agent:   |                                |
| Signature of Authorized Agent or Employee of Agent:  | Date:                          |
| Printed name of Authorized Agent or Employee of Agent:   |                                |
| 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

**(700) Price Offerings including Voice Rate Data  
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  | 2016                                |
| <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 |

<701> Residential Local Service Charge Effective Date 

|          |
|----------|
| 1/1/2015 |
|----------|

  
 <702> Single State-wide Residential Local Service Charge 

|  |
|--|
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<703>

| <a1>  | <a2>                | <a3>       | <b1>      | <b2>                           | <b3>                         | <b4>                        | <b5>                                   | <c>                           |
|-------|---------------------|------------|-----------|--------------------------------|------------------------------|-----------------------------|--|-------------------------------|
| State | Exchange (ILEC)     | SAC (CETC) | Rate Type | Residential Local Service Rate | State Subscriber Line Charge | State Universal Service Fee | Mandatory Extended Area Service Charge | Total per line Rates and Fees |
| WA    | Eatonville/ETVLWACS |            | FR        | 16.0                           | 0.0                          | 0.0                         | 0.0                                    | 16.0                          |
| WA    | Kapowsin/KPWSWAXA   |            | FR        | 16.0                           | 0.0                          | 0.0                         | 0.0                                    | 16.0                          |
|       |                     |            |           |                                |                              |                             |  |                               |
|       |                     |            |           |                                |                              |                             |  |                               |
|       |                     |            |           |                                |                              |                             |  |                               |
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|       |                     |            |           |                                |                              |                             |  |                               |
|       |                     |            |           |                                |                              |                             |  |                               |

(710) Broadband Price Offerings  
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  | 2016                                |
| <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 |

<711>

| <a1>  | <a2>               | <b1>             | <b2>                 | <c>   | <d1>                                      | <d2>  | <d3>     | <d4>                               |
|-------|--------------------|------------------|----------------------|-------|---|-------|----------|------------------------------------|
| State | Exchange (ILEC)    | Residential Rate | State Regulated Fees |       | Broadband Service - Download Speed (Mbps) |       |          |                                    |
| WA    | Eatonville/ETVLWAC | 41.95            | 0.0                  | 41.95 | 6.0                                       | 0.512 | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Eatonville/ETVLWAC | 51.95            | 0.0                  | 51.95 | 12.0                                      | 1.0   | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Eatonville/ETVLWAC | 61.95            | 0.0                  | 61.95 | 20.0                                      | 1.0   | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Eatonville/ETVLWAC | 41.95            | 0.0                  | 41.95 | 1.5                                       | 0.768 | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Kapowsin/KPWSWAXA  | 41.95            | 0.0                  | 41.95 | 1.5                                       | 0.768 | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Kapowsin/KPWSWAXA  | 41.95            | 0.0                  | 41.95 | 6.0                                       | 0.512 | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Kapowsin/KPWSWAXA  | 51.95            | 0.0                  | 51.95 | 12.0                                      | 1.0   | 999999.0 | Other, No Limit on Usage Allowance |
| WA    | Kapowsin/KPWSWAXA  | 61.95            | 0.0                  | 61.95 | 20.0                                      | 1.0   | 999999.0 | Other, No Limit on Usage Allowance |
|       |                    |                  |                      |       |   |       |          |                                    |
|       |                    |                  |                      |       |   |       |          |                                    |
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**(800) Operating Companies  
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  | 2016                                |
| <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 |
| <810> | Reporting Carrier   | Mashell Telecom, Inc.               |
| <811> | Holding Company   | Mashell Inc.                        |
| <812> | Operating Company   | Mashel Telecom, Inc.                |

| <813>      | <a1>                  | <a2>   | <a3>   |
|------------|-----------------------|--------|--|
| Affiliates |                       | SAC    | Doing Business As Company or Brand Designation |
|            | Mashell Telecom, Inc. | 522431 | Rainier Connect, Rainier Group, Local Access   |
|            |                       |        |  |
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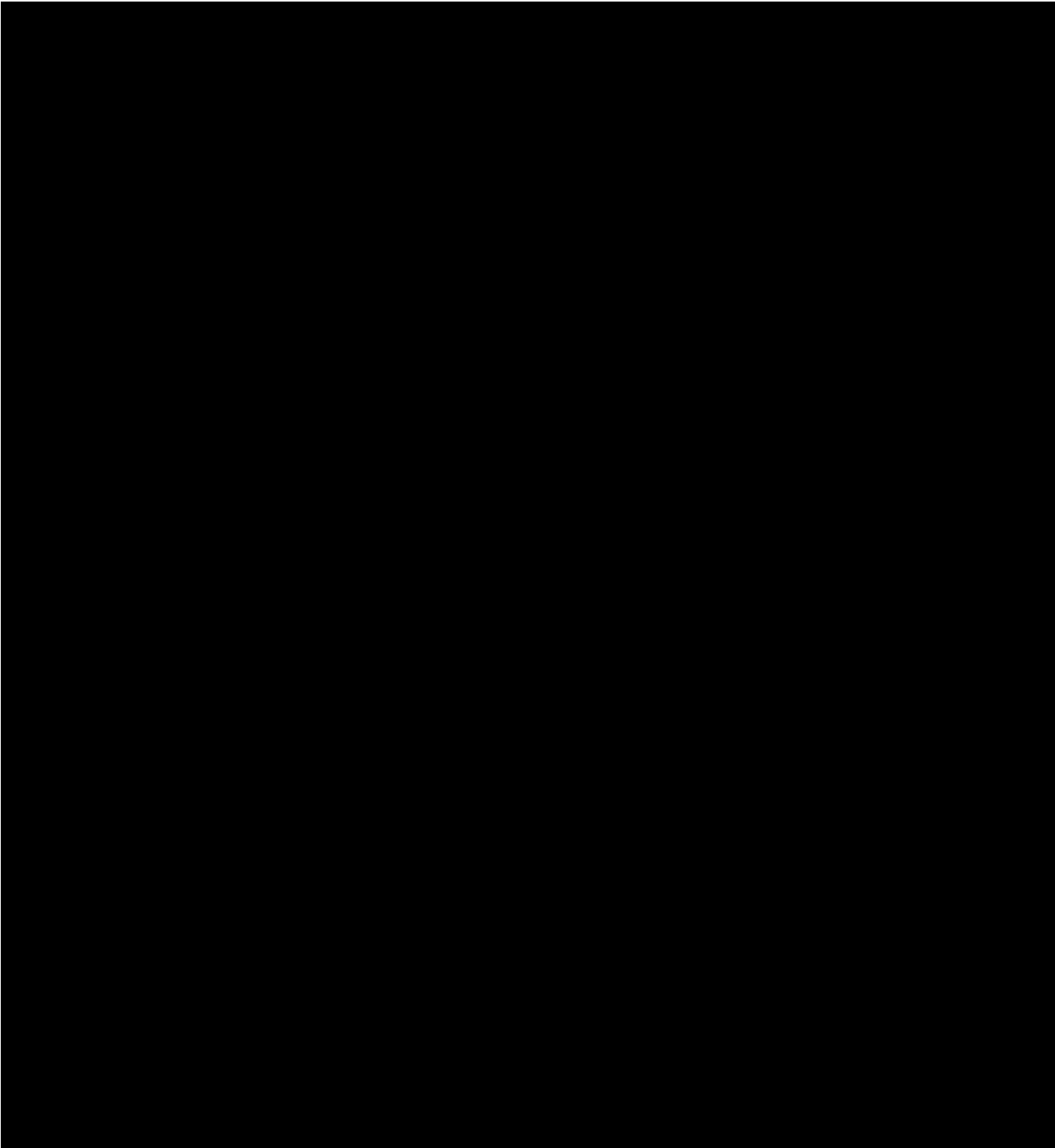
Progress Report  
 47 C.F.R §54.313(a)(1)  
 Mashell Telecom, Inc.

**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 was 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.

| <b>2015 Network Improvements/Upgrades VOICE and BROADBAND</b>  |                             |                                  |                                |                          |
|--|-----------------------------|----------------------------------|--------------------------------|--------------------------|
| <b>Project Description</b>   | <b>Estimated Start Date</b> | <b>Estimated Completion Date</b> | <b>Area Served</b>             | <b>Population Served</b> |
| Replace core data network routers  | May 2015                    | October 2015                     | Eatonville, WA<br>Kapowsin, WA | 3,143                    |
| Purchase Facilities that are currently rented for Central Office Operations and Warehouse Facilities | February 2015               | October 2015                     | Eatonville, WA<br>Kapowsin, WA | 3,143                    |
| Install new transport (ROADM/DWDM) equipment   | February 2015               | November 2015                    | Eatonville, WA<br>Kapowsin, WA | 3,143                    |
| Interconnection to middle mile fiber provider  | January 2015                | December 2015                    | Eatonville, WA<br>Kapowsin, WA | 3,143                    |



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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 \$47.48 as specified in Public Notice DA 15-470 issued on April 16, 2015. Company’s current total residential local end-user rate<sup>1</sup> of \$16.00 (which includes a local fee of \$16.00, 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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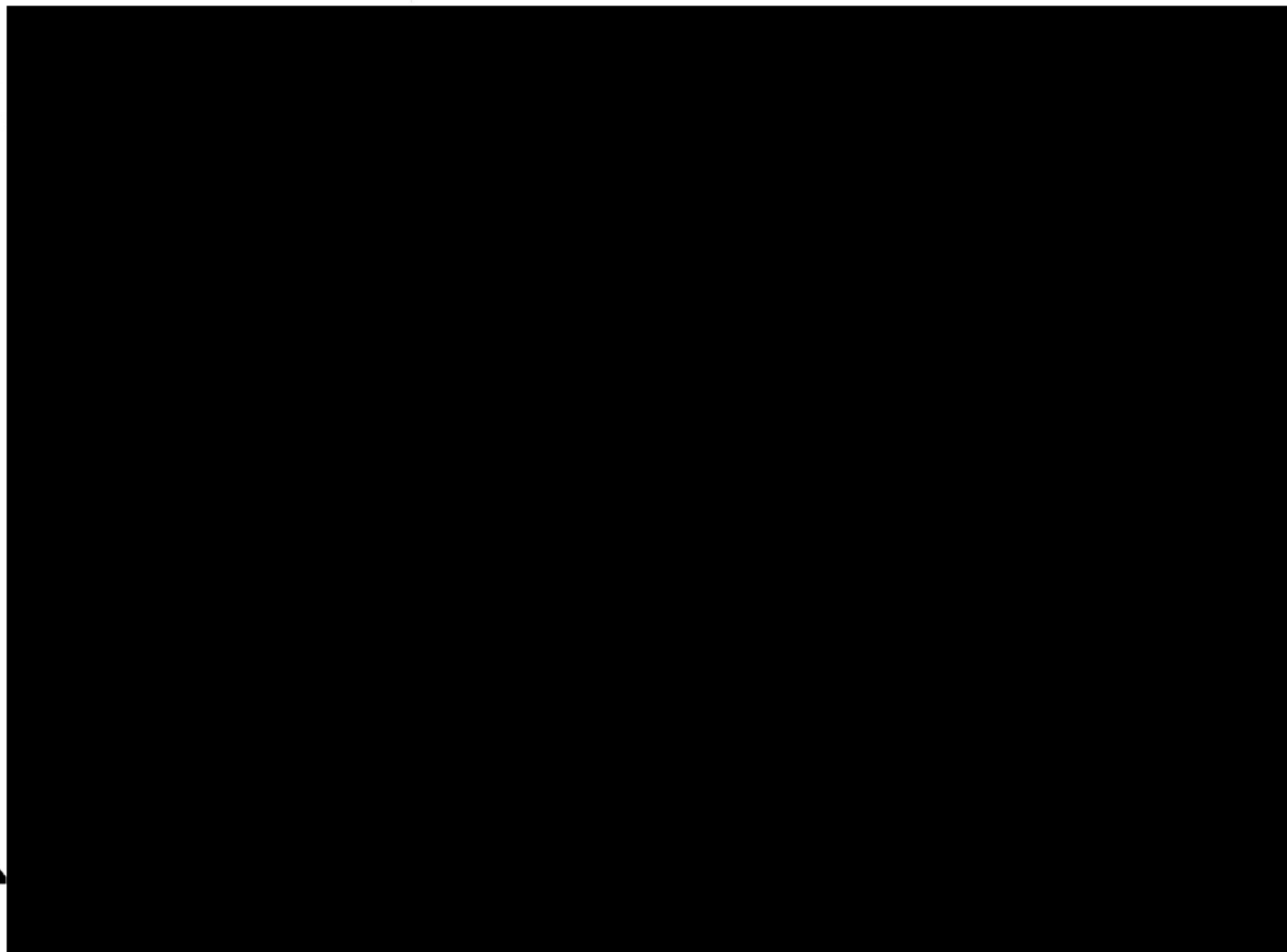
<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<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.”

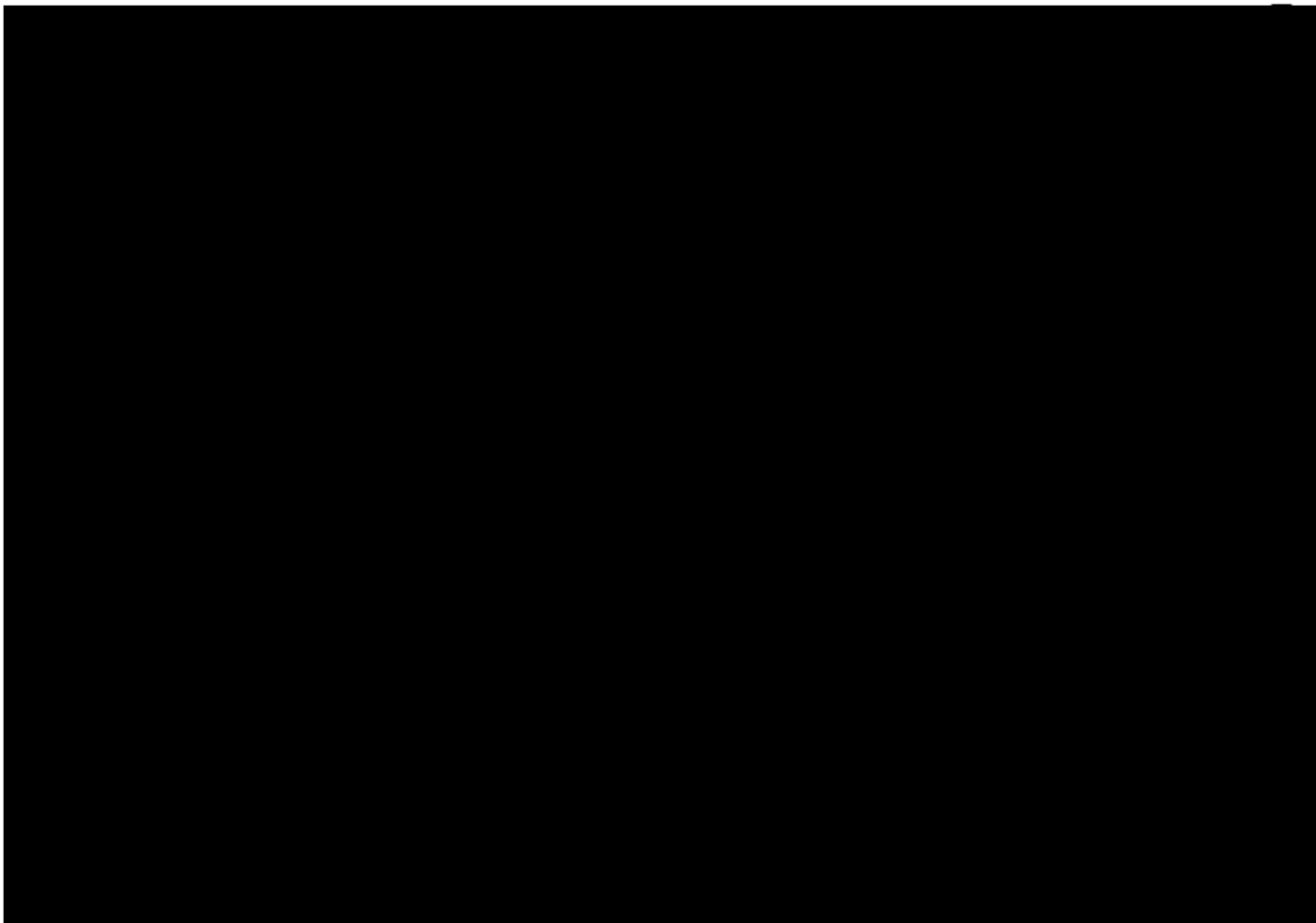
Response Line 3010  
Mashell Telecom, Inc.  
Study Area 522431

#### Milestone Certification

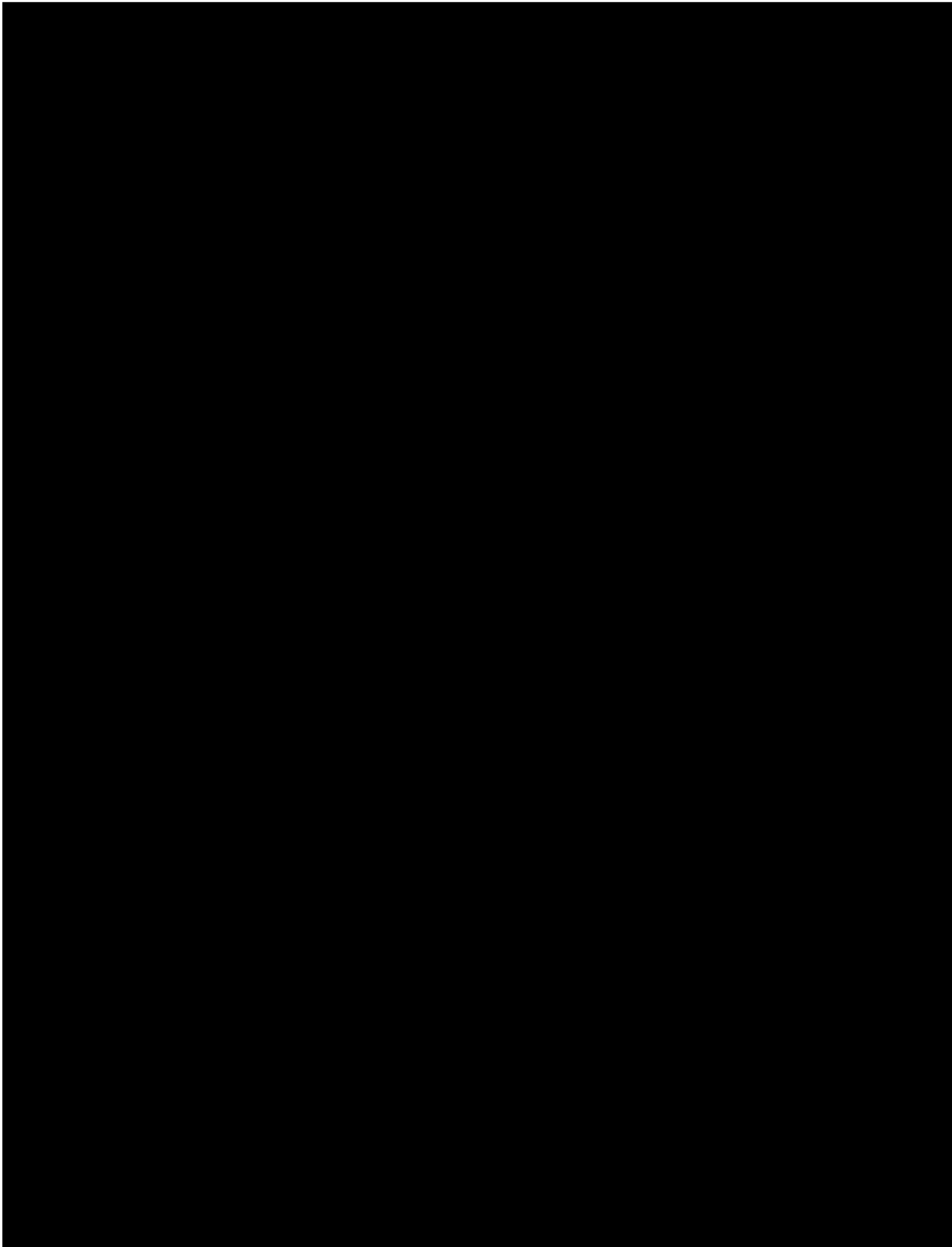
Pursuant to 47 C.F.R. § 54.202(a) Mashell Telecom, Inc. ("Company") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over 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.



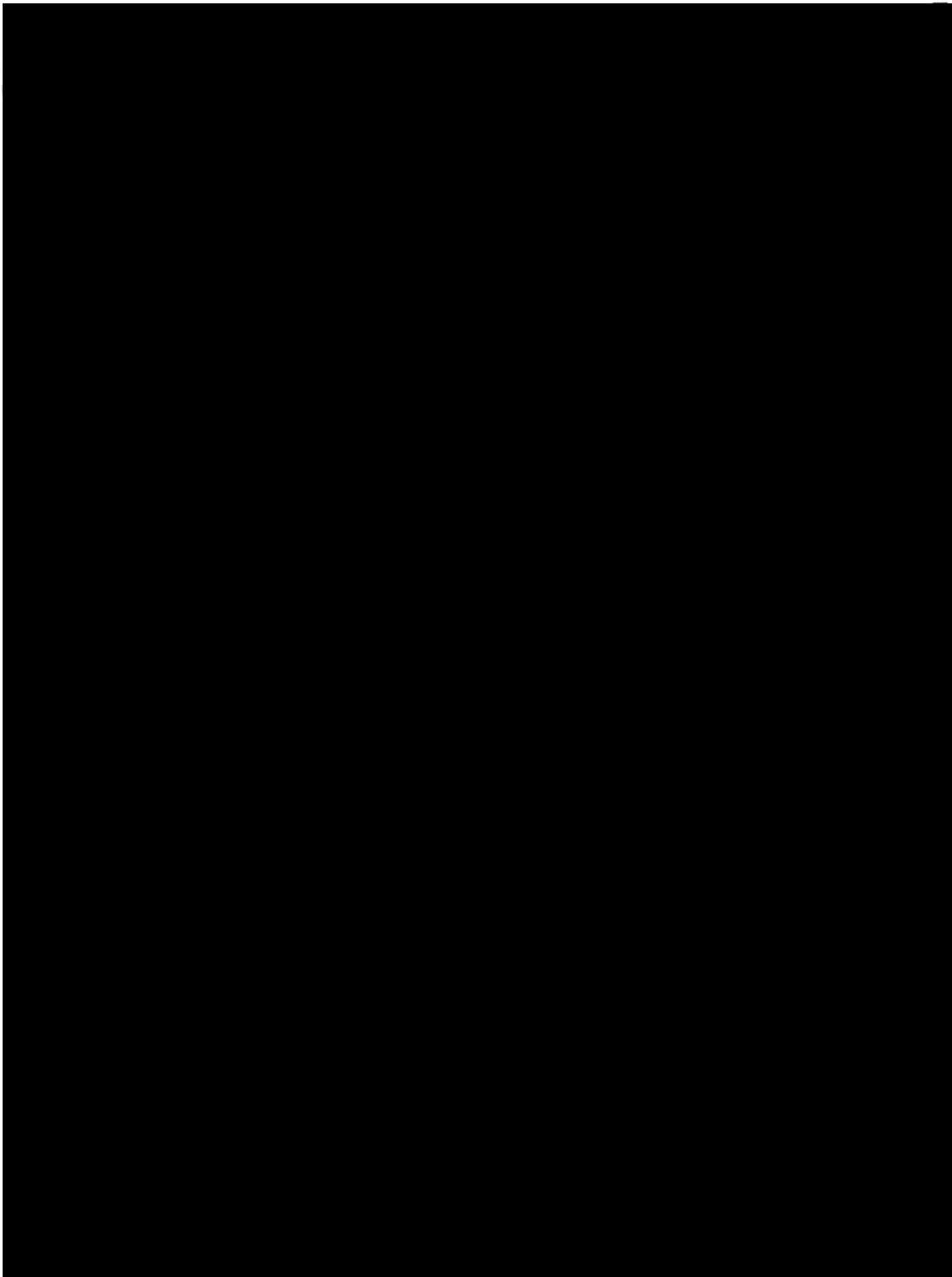
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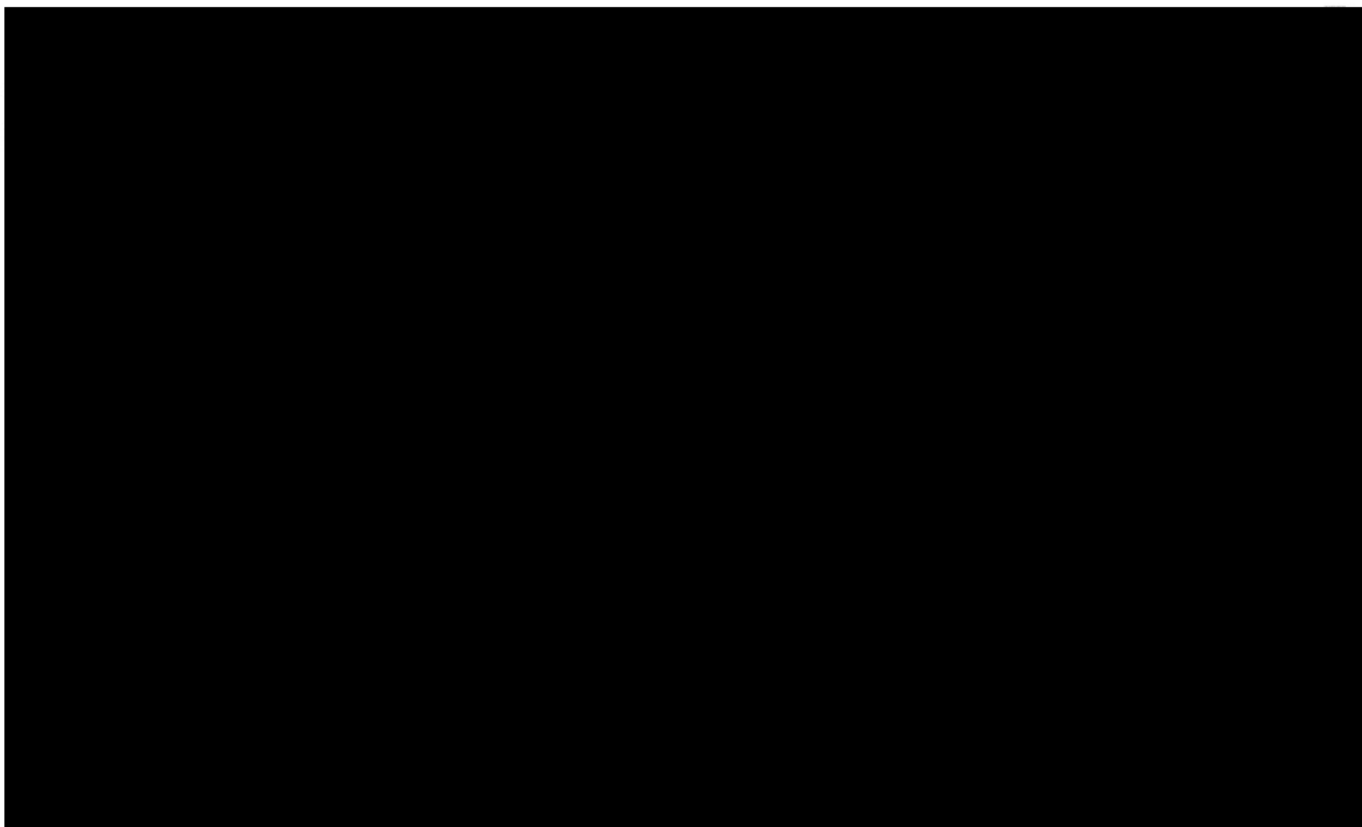
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[Accessibility Statement](#) | [Privacy Policy](#) | [Non-Discrimination](#)

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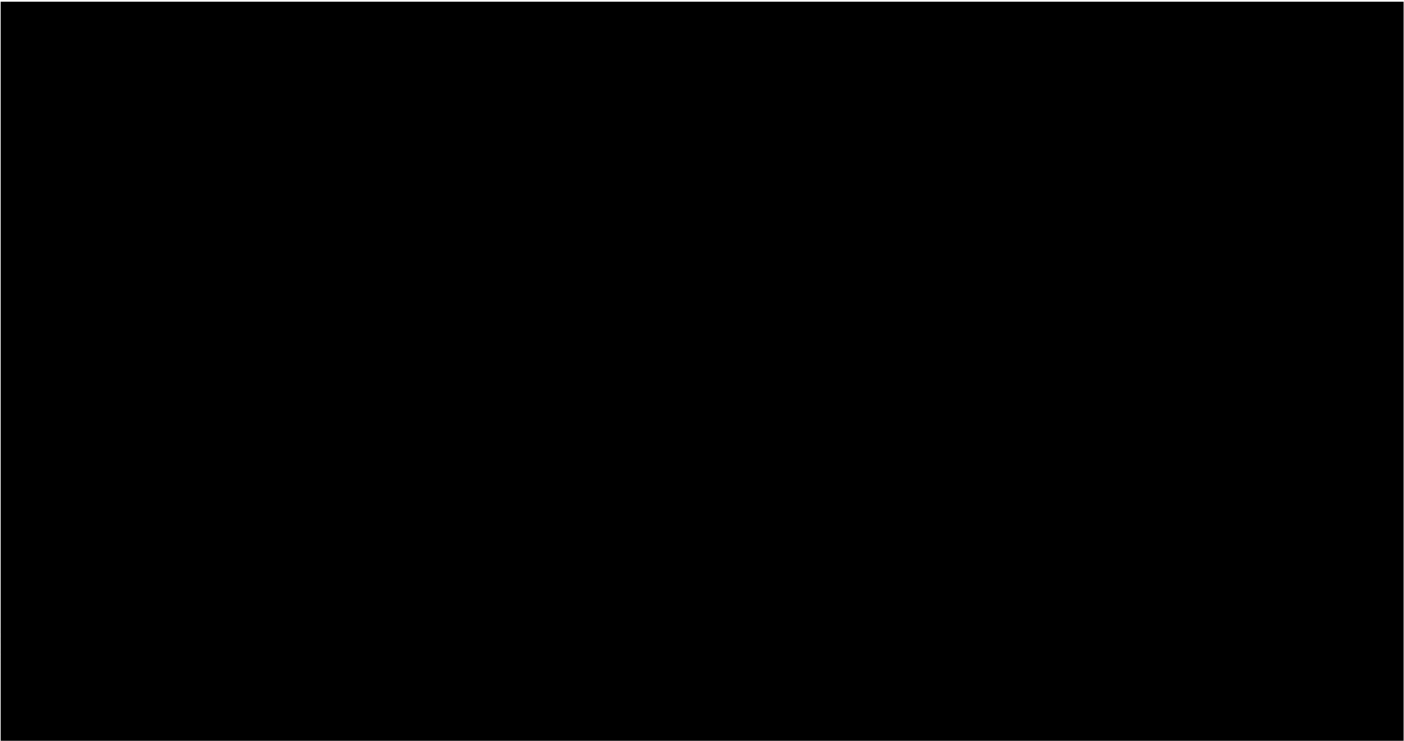
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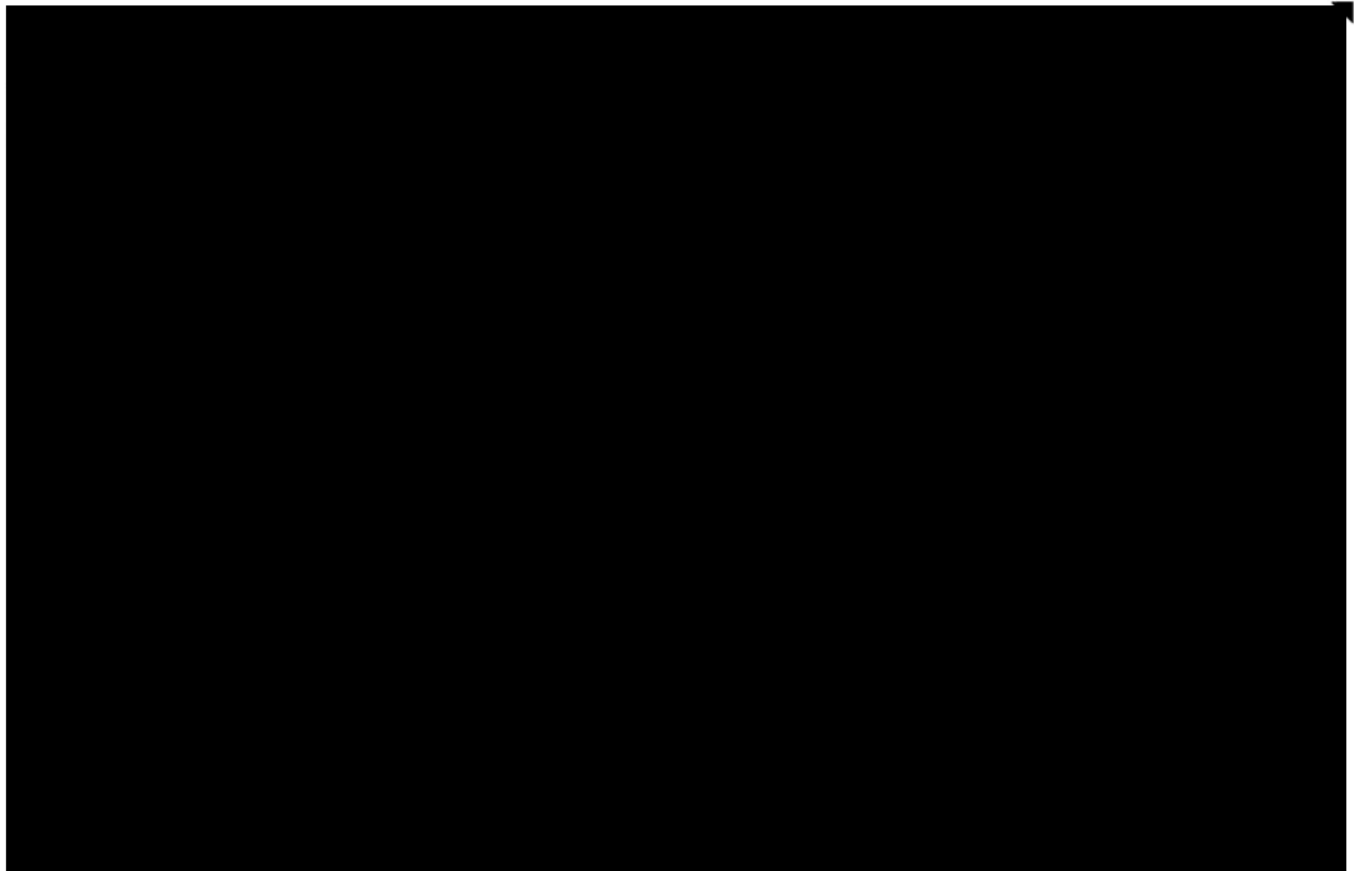
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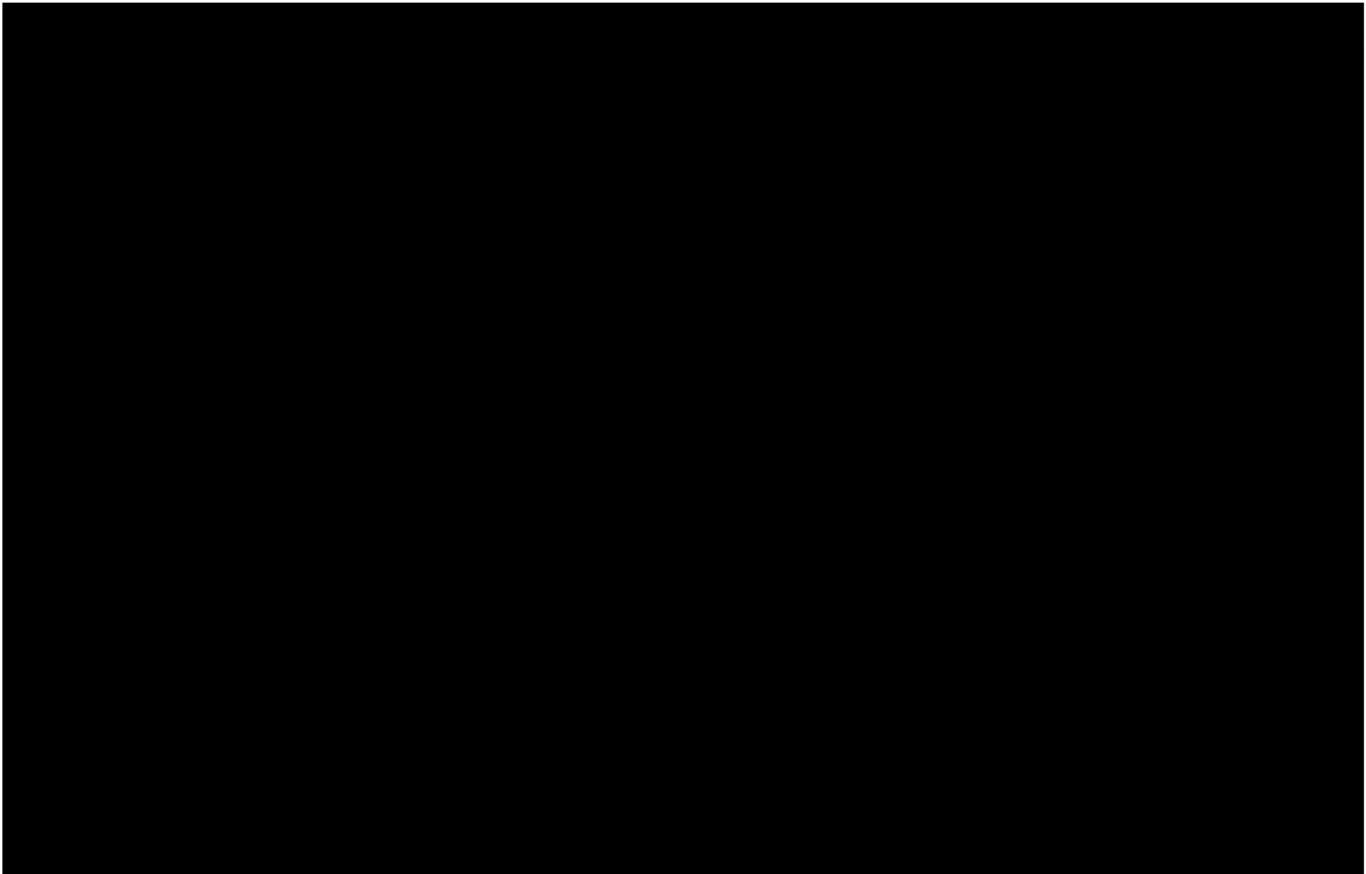
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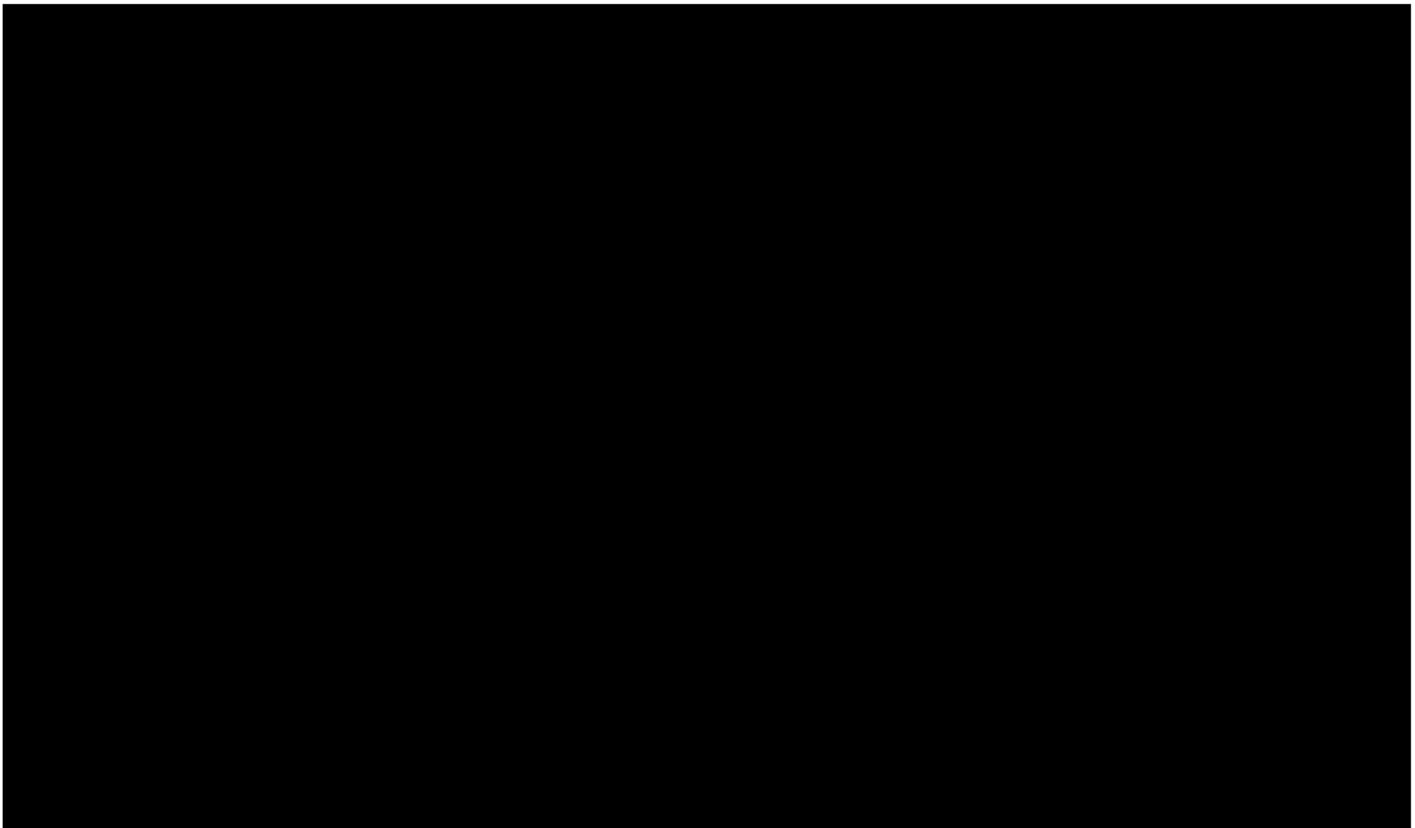
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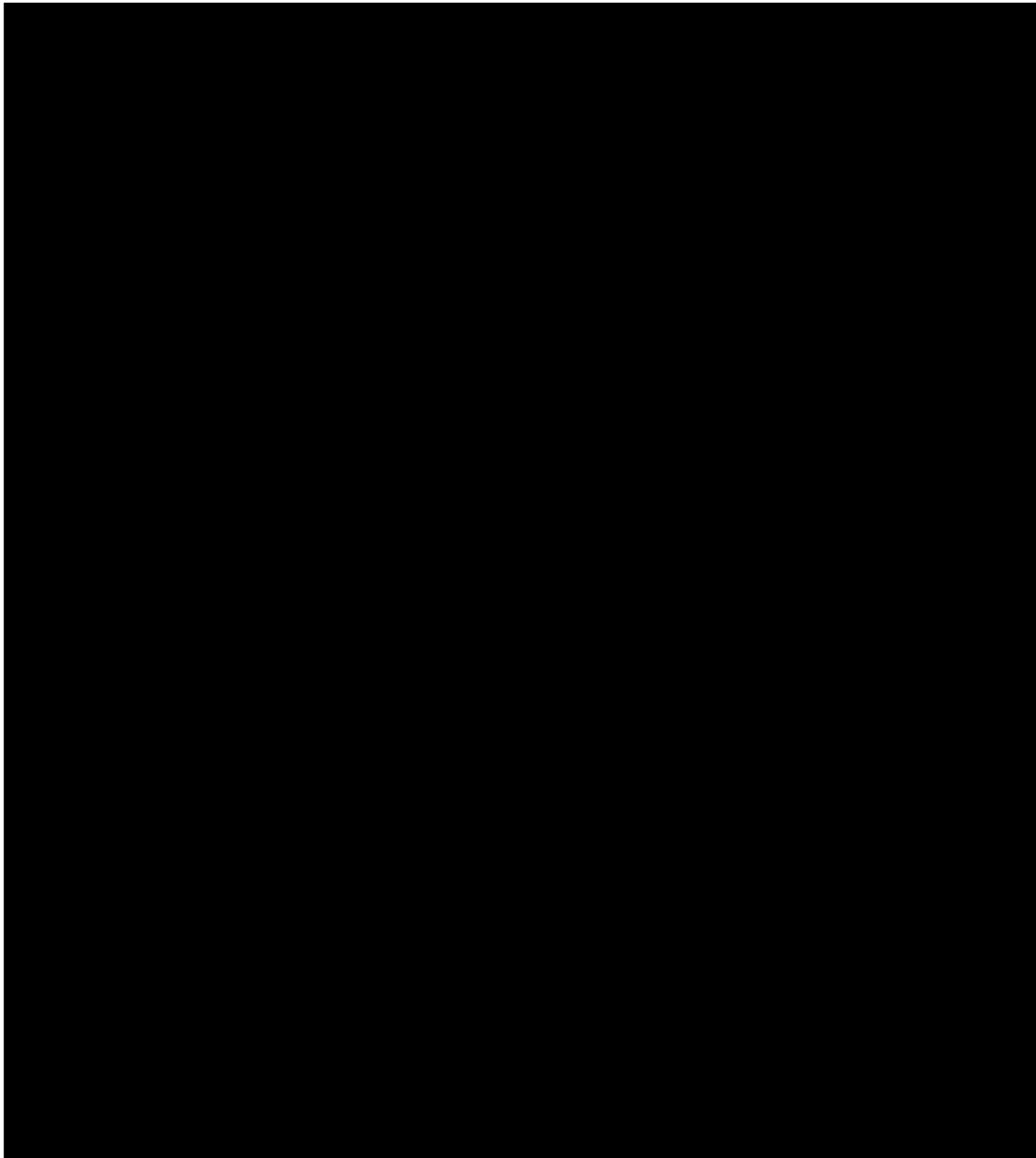
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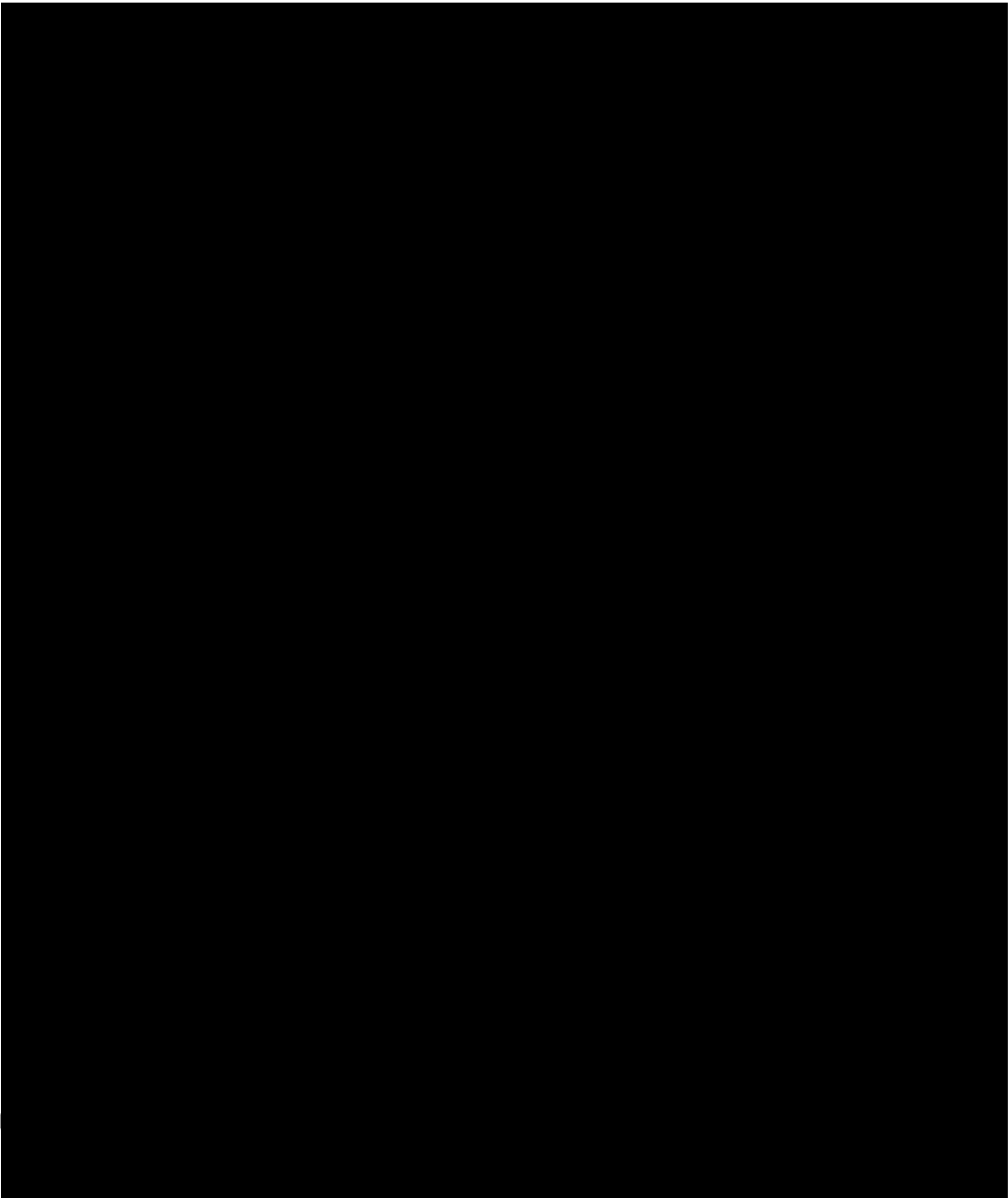
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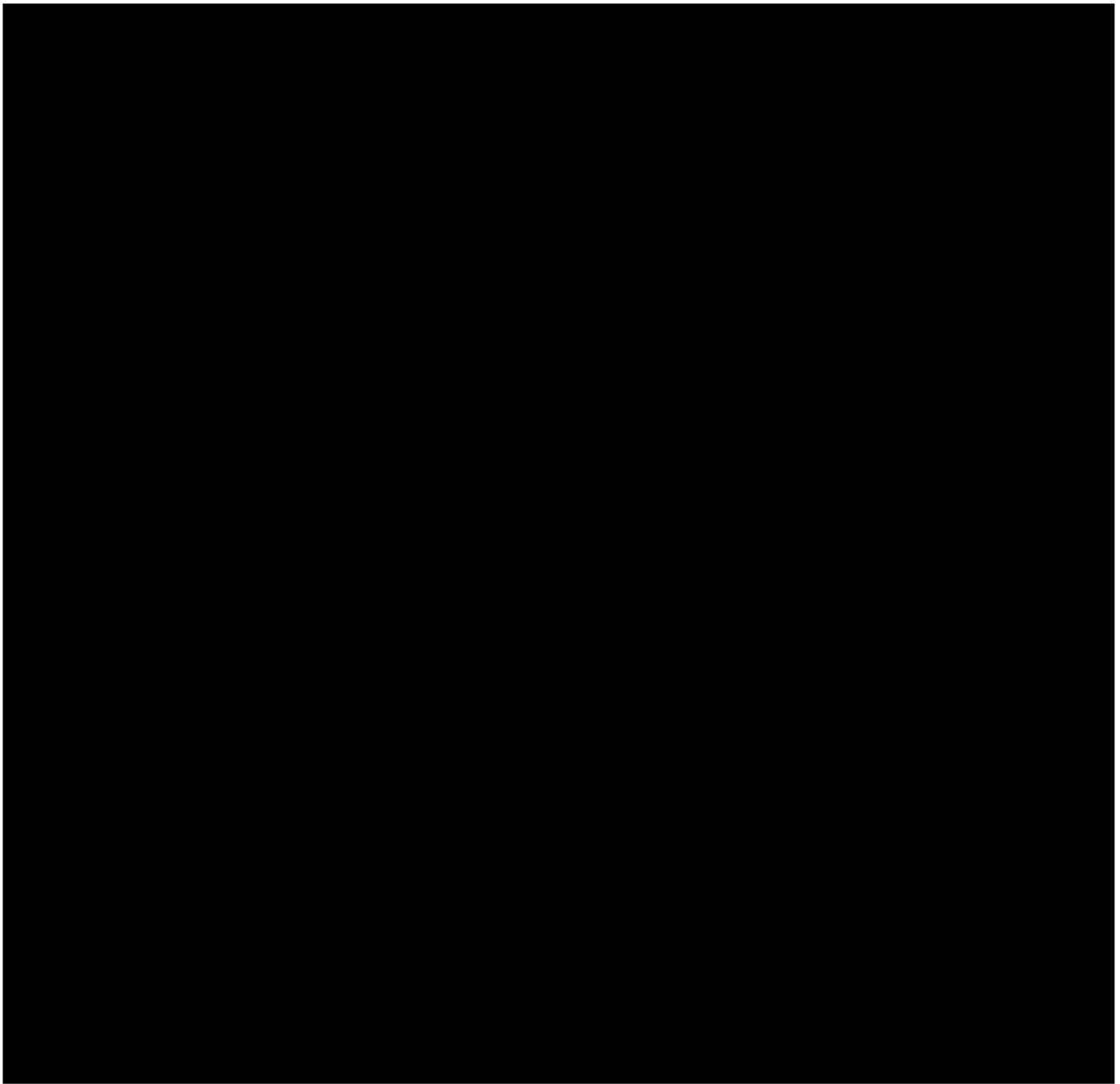


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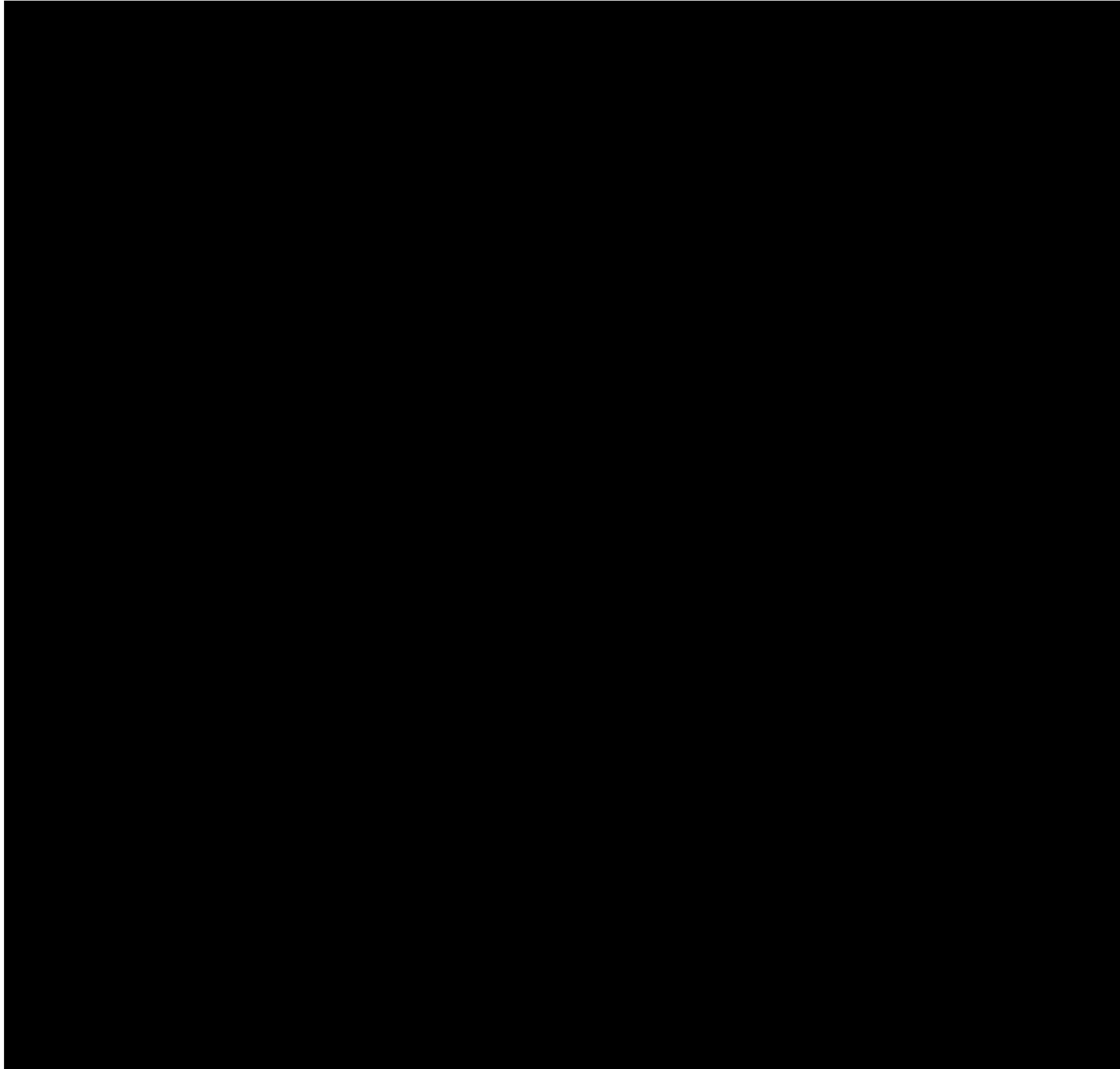


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