



October 27, 2022

VIA ELECTRONIC FILING SYSTEM

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

Received
Records Management
10/27/22 10:15:26
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: **2023 Petition to Receive USF Support - Exhibit 3 Revision**

Dear Ms. Maxwell:

MASHELL TELECOM, INC. DBA RAINIER CONNECT ("MASHELL"), a privately-held rate of return carrier receiving high cost support, has electronically submitted a 2023 Petition to Receive USF Support to the Commission Exhibit 3 Revision as requested by the Commission.

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

Sincerely,

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



THINK INSIDE THE BOX
Business and Residential Communications

EXHIBIT 3

PLAN TO PROVIDE, MAINTAIN, OR ENHANCE BROADBAND SERVICES

This Broadband Plan is being submitted by Mashell Telecom, Inc. in compliance with RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d). Under the terms of the legislation incorporated into RCW 80.36.650(3), a recipient of support from the state Universal Communications Program is to submit a broadband plan showing how the provider will provide, maintain, or enhance broadband services in its service area. As set out in WAC 480-123-110(1)(d), the broadband plan is to include specific elements, but only to the extent applicable to that particular broadband plan. The broadband plan does not have to include all elements but it can include any of the following elements: (1) a multi-year investment plan; (2) specific projects that are projected to provide or enhance broadband service at speeds required by the Commission or the Federal Communications Commission; (3) a plan for maintenance of broadband services in the provider's service area; (4) a description of how the provider will enhance broadband services in its service area; and (5) any other information that the Commission may request to assist in the Commission's review and analysis of the provider's broadband plan. Where there are specific projects, the project information is to include an estimated timeline, geographic location, number of locations passed, and upload and download speeds that are projected to be produced by the project.

Mashell Telecom, Inc. has constructed sufficient facilities for it to fall into either criterion three or criterion four of WAC 480-123-110 and as a result has constructed substantial broadband infrastructure throughout much or all of its service territory. This means that the company is looking for program support to allow it to continue to provide telecommunications services and broadband services at the levels that are provided today, with enhancements becoming available where appropriate.

The Company has already met the Federal Communications Commission's total broadband deployment obligations associated with federal high-cost program support as of the date of the Petition to which this is an Exhibit. In addition, the Company also meets the additional locations requested by the Commission as part of the State Universal Communications Program. Since January 1, 2018, the Company has invested over \$6 million to deploy secure and resilient broadband infrastructure to expand access for communities in both our Eatonville and Kapowsin exchanges. In 2019, the Company completed a five-year plan (2015-2019) to upgrade aging portions of its outside plant and network infrastructure to a Fiber-to-the-premise (FTTP) architecture. The FTTP network architecture provides customers' access to voice, multimedia, and data services over one unified access platform.

We are constantly working to identify gaps in service, gather service location data and quality of service complaints, and develop strategic planning for future broadband deployment and adoption. One example of this, is the recent launch of our student's access initiative program. The Company worked with schools to get students who cannot otherwise afford it a broadband connection so that the students can continue their education during the pandemic while schools are physically closed. In addition, all customer requests for increased speeds are individually considered for economic feasibility and completed where and when possible.

Our FTTP network currently provides 1G/1G synchronous service. The company currently offers 25/3Mbps or greater speeds to 62% of serviceable locations. The company's five-year investment plan provides for capital expenditures to expand our FTTP network annually to service an additional thirty five percent of our customer base that currently has service speeds below 25/3Mbps. The Company goal is to

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

Supply chain shortages experienced in prior years and early 2022 are no longer an issue and the company has successfully deployed fiber to 100 locations year to date. The Company is on target to hit 90% of the aforementioned projected goal for the current year. For 2023, estimated repairs and maintenance expense and capex total \$381K. Repairs and maintenance costs consist primarily of general support equipment such as vehicles, tools, and buildings as well as general annual repairs related to service outages and facility relocation. The FTTP plant is relatively new and the Company does not forecast significant repairs and maintenance expense.

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

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