

Redacted Version

Declaration Networks Group, Inc. Annual Eligible Telecommunications

Carrier Report for 2019 and Annual Plan

Declaration Networks Group, Inc. (“DNG”),¹ submits its Annual Eligible Telecommunications Carrier Report for 2019 (“2019 Report”) and Annual Plan in accordance with WAC 480-123-060 through WAC 480-123-080.

I. DNG ETC REPORT FOR 2019

A. Annual Certification of Eligible Telecommunications Carrier

With this filing DNG requests continued certification as an ETC in Washington. In accordance with WAC 480-123-060, DNG’s EXHIBIT A contains a certification “that all federal high-cost support provided to the ETC within Washington state was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”

B. Report Required by WAC 480-123-070 for Calendar Year 2019

DNG received an ETC designation in 2019 in connection to being the winning bidder in the Connect America Fund Phase II Auction (“CAF II support). DNG has begun to initiated operations in the State of Washington but did not provide any Lifeline services in Washington state in 2019.

1. Report on use of federal funds and benefit to customers.

Information on the amount of CAF II support received and the capital expenditures made in Washington to build out DNG is available in CONFIDENTIAL EXHIBIT B. DNG did not received any support relating to high cost services other than the CAF II support.

2. Local service outage report.

DNG did not provide local exchange service in Washington in 2019 so there were no outages to report.

3. Report on failure to provide service.

¹ The Commission designated Declaration Networks Group, Inc. as an eligible telecommunications carrier (“ETC”) in certain areas of Stevens County, Washington in Order dated January 31, 2019 in Docket UT-180819.

DNG is in the process of building out their service area. DNG did not provide voice services in Washington in 2019 and only provided broadband service to a limited number of customers in the state of Washington in 2019. DNG did not receive any request for service in its ETC services area in 2019.

4. Report on complaints per one thousand connections.

DNG did not receive any complaints from ETC customers in 2019.

5. Certification of compliance with applicable service quality standards and consumer protection rules.

DNG will be offering fixed wireless services, not mobile wireless. Therefore, some of the provisions of the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service ("CTIA Code") are not applicable to DNG. DNG will comply with those portions of the CTIA Code which are applicable to fixed wireless services. DNG will also comply with the applicable consumer protection and service quality standards of WAC chapter 480-120. Please see Certification contained in EXHIBIT A.

6. Certification of ability to function in emergency situations.

DNG will have adequate amounts of back-up power to ensure functionality without an external power source, and DNG maintains a redundant network backbone with redundant paths to the internet. Power outage protection is available at all site by means of battery back-up for a minimum of 18 hours. Portable generator hookups are available for extended outage periods. Please see Certification contained in EXHIBIT A.

7. Advertising certification.

DNG is in the process of building out their ETC service area and it did not provide ETC service in 2019. DNG will advertise the availability of services supported by federal universal service mechanisms including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers currently not receiving discounts in the area where it has an ETC designation. DNG's sales and marketing efforts are focused on addressing the pain points typically experienced with competitors' offerings (i.e., low speeds, high monthly fees, data caps, and spotty service availability) through key messages that highlight our superior service quality, value and support. Please see Certification contained in EXHIBIT A.

II. WAC 480-123-080 ANNUAL PLAN FOR UNIVERSAL SERVICE SUPPORT EXPENDITURES.

DNG anticipates using the funds received in connection with Connect America Fund Phase II Auction to build out its network where it has ETC designation in the state of Washington. Other

than CAF II support, DNG does not anticipate to receive material federal high cost support in 2020.

Exhibit A

Declaration Networks Group, Inc. ETC Certification 2019

I, Robert Nichols, am the chief executive officer of Declaration Networks Group, Inc. (the "Company"); that I am authorized to make this Verification on behalf of the Company;; and that I certify or declare under penalty of perjury under the laws of the State of Washington that the following is true and correct to the best of my knowledge, information, and belief:

1. The Company used all federal universal service high-cost support received in 2019 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
2. The Company will use any federal universal service high-cost support received in the following year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
3. The Company materially complies with all the requirements of WAC 480-123-070 and WAC 480-123-80.
4. DNG will comply with those portions of the CTIA Code which are applicable to fixed wireless services. DNG will also comply with the applicable consumer protection and service quality standards of WAC chapter 480-120.
5. DNG will have adequate amounts of back-up power to ensure functionality without an external power source, and DNG maintains a redundant network backbone with redundant paths to the internet. Power outage protection is available at all site by means of battery back-up for a minimum of 18 hours. Portable generator hookups are available for extended outage periods.
6. DNG will advertise the availability of services supported by federal universal service mechanisms including advertisement of applicable telephone assistance programs, such as

Lifeline, that is reasonably calculated to reach low-income consumers currently not receiving discounts in the area where it has an ETC designation. DNG's sales and marketing efforts are focused on addressing the pain points typically experienced with competitors' offerings (i.e., low speeds, high monthly fees, data caps, and spotty service availability) through key messages that highlight our superior service quality, value and support.

A handwritten signature in blue ink, appearing to read "Robert Nichols", written over a horizontal line.

Robert Nichols

Date: June 30, 2020

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Exhibit B