

Redacted Version

Declaration Networks Group, Inc. Annual Eligible Telecommunications

Carrier Report for 2023 and Annual Plan

Declaration Networks Group, Inc. (“DNG”),¹ submits its Annual Eligible Telecommunications Carrier Report for 2023 (“2023 Report”) and Annual Plan in accordance with WAC 480-123-060 through WAC 480-123-080.

I. DNG ETC REPORT FOR 2023

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 2023

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 voice Lifeline services in Washington state in 2023.

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 receive any support relating to high cost services other than the CAF II support.

2. Local service outage report.

DNG provided voice services to a very limited number of voice customers in 2023 (fifteen total customers) and there were no outages as defined by WAC-480-123-70 Section 2(a) 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 provided limited voice services in Washington in 2023. DNG did not receive any request for service in its ETC services area in 2023.

4. Report on complaints per one thousand connections.

DNG did not receive any complaints from ETC customers in 2023.

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

DNG offers 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 eighteen (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 offered ETC service in the ETC areas that were in-service in 2023. DNG advertises 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. Additionally, information about the Lifeline program is available on DNG's website at: <https://www.neubeam.com/lifeline-information/>. With the wind-down of the ACP discount in May 2024, DNG is offering lifeline discounts on customers' internet service for those who qualify. 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 2024. Declaration Networks Group, Inc (DNG) was awarded an FCC CAF 2 Award in 2018 to provide broadband access to more than two thousand (2,000) specific residential and small business locations in Stevens County, WA. The FCC through USAC provides DNG for a period of ten (10) years a monthly subsidy amounts equal to 1/120th of the total award amount to be used to for the provision, maintenance and upgrade of DNG's network and operations in support of the designated Stevens County locations. DNG has substantially deployed a broadband network that is currently offering broadband services to more than ninety-four and one-half percent (94.5%) of the specific locations for the DNG CAF 2 award, which is ahead of the required sixty percent (60%) at the end of 2023, as prescribed by the FCC CAF 2 program requirements, and above the eighty percent (80%) deployment requirements that are the requirements for the end of 2024.

The construction expenditures will benefit customers by increasing the availability of services in their area. Generally, the DNG Stevens County network consists of more than twenty (20) Towers with Fixed Wireless radios that provide broadband access to more than twenty-one thousand (21,000) locations. DNG has initiated construction activities in Stevens County that additionally includes over One hundred and eighty (180) miles of fiber route miles that will provide Fiber to the Home (FTTH) service for more than two thousand (2,000) locations, as well as additional next generation wireless radio upgrades that will cover more than thirty-six thousand (36,000) locations. See also Confidential Exhibit B.

Exhibit A

Declaration Networks Group, Inc. ETC Certification 2023

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:

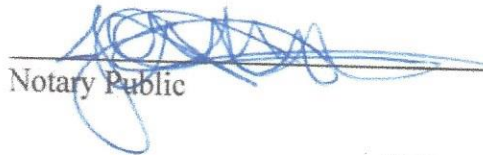
1. The Company used all federal universal service high-cost support received in 2023 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.
2. The Company will use any federal universal service high-cost support received in the coming year (2025) 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 480-123-080.
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.



Robert Nichols

Sworn and subscribed before me this 20 day of June, 2024



Notary Public

My commission expires November 30, 2026



Redacted Version

Exhibit B