

REDACTED-FOR PUBLIC INSPECTION

June 26, 2014

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, 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 480-07-160, two 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”.



THINK INSIDE THE BOX
Business and Residential Communications

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

CONFIDENTIAL FILING

June 26, 2014

VIA OVERNIGHT DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Ms. Dortch:

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 (“Protective Order”) and also in conjunction with 47 C.F.R. §§ 0.457 and 0.459. Further justification for this confidential filing is identified below in accordance with 47 C.F.R. §0.459(b).

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 both 47 C.F.R. §§ 0.457 and 0.459.

47 C.F.R. § 049(b): Information provided by MASHELL includes specific information related to financial data and is subject to protection for the following reasons:

47 C.F.R. § 049(b)(1) Identification of the specific information for which confidential treatment is sought:

MASHELL requests that all financial data, and loop/subscriber counts and route mile data be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. MASHELL maintains this information is confidential, competitively sensitive data not normally made available to the public. Release of this information would have a substantial negative competitive impact on MASHELL. The non-redacted version of the cover letter for MASHELL's submission and each page of the file containing confidential information is marked, "CONFIDENTIAL FINANCIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

47 C.F.R. § 049(b)(2) Identification of the Commission proceeding in which the information was submitted:

The information is being submitted in compliance with 47 C.F.R. § 54.313(f)(2) and is to be filed in WC Docket No. 10-90. Privately held rate of return carriers that receive high-cost support must complete the FCC Form 481 to include a full and complete annual support of Mashell's financial condition and operations as of the end of the preceding fiscal year (sections of which MASHELL is requesting be afforded confidential treatment).

47 C.F.R. § 049(b)(3) Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged:

The information designated as confidential is detailed financial information including a balance sheet, income statement, cash flow statement that is competitively sensitive information not normally released to the public. Release of any of this commercial or financial information would have a substantial negative competitive impact on MASHELL.

47 C.F.R. § 049(b)(4)&(5) Explanation of the degree to which the information concerns a service that is subject to competition and how disclosure of the information could result in substantial competitive harm:

This type of commercial and financial information is generally not subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that the release of this type of information likely would produce competitive harm. Release of the information designated as confidential would allow competitors to become aware of sensitive proprietary information regarding the operation of MASHELL's business and would cause MASHELL substantial competitive harm.

47 C.F.R. § 049(b)(6)&(7) Identification of measures taken by Mashell to prevent unauthorized disclosure: availability of the information to the public and extent of any previous disclosure of the information to third parties;

MASHELL treats and has treated the non-public information included in this submission as confidential and has protected it from disclosure to parties outside Mashell. Any financial information required to be submitted to a state regulatory authority has been filed as confidential information, not available to the public, in accordance with state rules and/or statutes.

47 C.F.R. § 049(b)(8) Justification of the period during which Mashell asserts that material should not be available for public disclosure;

MASHELL cannot determine any date on which this information should not be considered confidential. However MASHELL does believe that this information should be treated confidential for a minimum of 10 years.

47 C.F.R. § 049(b)(8) Other information Mashell believes may be useful in assessing whether its request for confidentiality be granted;

Under applicable Commission rules and court rulings, the information designated by Mashell as confidential should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act protects information that is commercial or financial in nature; obtained from a person outside government; and privileged or confidential.

As specified in the Protective Order, two 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"

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

Sincerely,



Danielle Clause, Controller
For Mashell Telecom Inc. dba Rainier Connect

Enclosures

.cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2015
<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	54.422
	Completion Required	Completion Required

			<i>(check box when complete)</i>	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<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)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<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)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)				
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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="0.0"/>	<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	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<510> <input type="text" value="522431wa510.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610> <input type="text" value="522431wa610.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	<input checked="" type="radio"/> <input type="radio"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<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	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	REDACTED-FOR PUBLIC INSPECTION	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	<i>(complete attached worksheet)</i>	<input checked="" 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	2015
<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 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.docx

<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.

112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

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

<010>	Study Area Code	522431
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<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.

Select (Yes,No, NA)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
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July 2013

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<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

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(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
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<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
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<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-notice-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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

CHECK the boxes below 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)}
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

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

- <2012> 2013 Frozen Support Certification
- <2013> 2014 Frozen Support Certification
- <2014> 2015 Frozen Support Certification
- <2015> 2016 and future Frozen Support Certification

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>

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2015
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<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.

(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))

[Redacted]

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)
(3016)

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

[Redacted]

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) Management letter issued by the independent certified public accountant that performed the company's financial audit.

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)

522431wa3026.xlsx, 522431wa3026.pdf

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

**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
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<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:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
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 Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	ext.
Study Area Code of Reporting Carrier:	522431 Filing Due Date for this form: 07/01/2014
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
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<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: ext. _____	
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: ext. _____	
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

**5-Year Service Quality Improvement Plan
47 C.F.R. §54.202(a)(1)
Mashell Telecom, Inc.**

June 26, 2014

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Ms. Karen Majcher
Vice President – High Cost Low Income Division
Universal Service Administrative Company
2000 L Street NW, Suite 200
Washington, D.C. 20036

RE: WC Docket No. 10-90: Annual Reporting Requirements for High-Cost Recipients §54.202(a)(1).

Pursuant to 47 C.F.R. §54.202(a)(1) of the Federal Communications Commission's rules, enclosed please find the Initial 5-Year Service Quality Improvement Plan for Mashell Telecom, Inc., Study Area Code 522431.

Should you have any questions regarding this filing, please contact me via email at danielle.clausen@rainierconnect.net or by phone at 360-832-4130.

Sincerely,



Danielle Clausen
Controller

Enclosures

cc: Washington Utilities & Transportation Commission

5-Year Service Quality Improvement Plan
47 C.F.R. §54.202(a)(1)
Mashell Telecom, Inc.

Five-Year Service Quality Improvement Plan –

§ 54.202(a) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each applicant shall estimate the area and population that will be served as a result of the improvements. Except, a common carrier seeking designation as an eligible telecommunications carrier in order to provide supported services only under subpart E of this part does not need to submit such a five-year plan.

The receipt of USF support, combined with other funding sources will allow Mashell Telecom, Inc. to continue to provide reliable, state-of-the-art, high-quality voice and broadband service to its 2,716 rural customers. Mashell Telecom, Inc. has two wire centers: ETVLWACS in Eatonville, WA and KPWSWAXA in Kapowsin, WA .

Mashell Telecom, Inc. anticipates that it will make the following improvements and/or upgrades to its network over the next five years that will jointly impact voice and broadband services:

2014 Projected Network Improvements/Upgrades VOICE and BROADBAND				
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
Upgrade remote circuit equipment	July 2014	July 2014	Barney's Corner	300
Consolidate CO SONET circuit equipment and migrate to modern platform	January 2014	October 2014	Eatonville, WA Kapowsin, WA	2,716
Upgrade switching capacity on new switch to retire legacy phone switch.	January 2014	October 2014	Eatonville, WA Kapowsin, WA	2,716
Upgrade CO circuit equipment to offer FTTx technologies such as GPON and Active Ethernet.	June 2014	June 2014	Eatonville, WA Kapowsin, WA	2,716
Upgrade CO broadband switching equipment from 1G to 10G interface capacity.	June 2014	July 2014	Eatonville, WA Kapowsin, WA	2,716

**5-Year Service Quality Improvement Plan
47 C.F.R. §54.202(a)(1)
Mashell Telecom, Inc.**

2015 Projected Network Improvements/Upgrades VOICE and BROADBAND				
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
Replace core data network routers	May 2015	October 2015	Eatonville, WA Kapowsin, WA	2,716
Purchase Facilities that are currently rented for Central Office Operations and Warehouse Facilities	February 2015	February 2015	Eatonville, WA Kapowsin, WA	2,716
Install new transport (ROADM/DWDM) equipment	February 2015	October 2015	Eatonville, WA Kapowsin, WA	2,716
Interconnection to middle mile fiber provider	January 2015	December 2015	Eatonville, WA Kapowsin, WA	2,716

2016 Projected Network Improvements/Upgrades VOICE and BROADBAND				
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
Install FTTP Remote equipment (OLT)- Eatonville Wire Center	January 2016	March 2016	Eatonville, WA	1376
Purchase Bucket Vans	January 2016	March 2016	Eatonville, WA	2,716
Purchase Optical Power Meters	January 2016	March 2016	Eatonville, WA	2,716
Purchase Optical Power Meters	March 2016	March 2016	Eatonville, WA	2,716
Purchase OTDR and Fiber identifiers	January 2016	March 2016	Eatonville, WA	2,716
Fiber overbuild of copper plant- Eatonville Wire Center	January 2016	December 2016	Eatonville, WA	1376

**5-Year Service Quality Improvement Plan
47 C.F.R. §54.202(a)(1)
Mashell Telecom, Inc.**

2017 Projected Network Improvements/Upgrades VOICE and BROADBAND				
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
Install FTTP Remote equipment (OLT) Kapowsin Wire Center	January 2017	March 2017	Kapowsin, WA	348
Install Remote fiber management Kapowsin Wire Center	January 2017	March 2017	Kapowsin, WA	348
Fiber overbuild to replace segments of plant Kapowsin Wire Center	January 2017	December 2017	Kapowsin, WA	348

2018 Projected Network Improvements/Upgrades VOICE and BROADBAND				
Project Description	Estimated Start Date	Estimated Completion Date	Area Served	Population Served
Extend Fiber from existing DSLAM's to new remote locations. (Shorten copper loop lengths by 40-50%).	January 2018	December 2018	Eatonville, WA	992
Install new DSLAM's following fiber extension.	January 2018	December 2018	Eatonville, WA	992

Response Line 510
Mashell Telecom, Inc.
Study Area 522431

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 its 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.

Response Line 610
Mashell Telecom, Inc.
Study Area 522431

Functionality in Emergency Situations:

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 a 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.

	Number of fields with invalid data
3005a BalanceSheet	0
3005b IncomeStatement	0
3005c Cashflow	0

Mandatory fields that are blank			
Worksheet	Input Item	Line Item	Error Status
3005a BalanceSheet	Study Area Code	<010>	OK
3005a BalanceSheet	Study Area Name	<015>	OK
3005a BalanceSheet	Program Year	<020>	OK
3005a BalanceSheet	Contact Name - Person USAC should contact regarding this data	<030>	OK
3005a BalanceSheet	Contact Telephone Number - Number of person identified in data line <030>	<035>	OK
3005a BalanceSheet	Contact Telephone Email Address - Email Address of person identified in data line <030>	<039>	OK
3005c Cashflow	Explanation for cell C20	5	OK
3005c Cashflow	Explanation for cell C39	22	OK
3005c Cashflow	Explanation for cell C45	27	OK

Totals that can not be zero			
Worksheet	Input Item	Line Item	Error Status
3005a BalanceSheet	Total Assets	24	OK
3005a BalanceSheet	Total Liabilities and Equity	59	OK
3005b IncomeStatement	Input items for prior year		OK
3005b IncomeStatement	Input items for current year		OK

