

EXHIBIT 3
BROADBAND PLAN

On July 30, 2020, **Western Wahkiakum County Telephone Company** (“Company”¹) adopted a Broadband Plan, as contemplated by RCW 80.36.650(3)(a)(ii) and WAC 480-123-110(1)(d). That plan was submitted to the Washington Utilities and Transportation Commission (“Commission”) as Exhibit 3 to a petition by the Company for support from the state Universal Communications Services Program established by RCW 80.36.650 (“Program”) for the Program year 2021, which petition was assigned by the Commission Docket No. UT-200704 (“July 2020 Petition”). The Company’s broadband plan for Program year 2023 is a continuation of the Company’s broadband plan that was included in the July 2020 Petition, with the following two modifications:

(1) As previously adopted, the Company’s Broadband Plan made reference to the Company’s understanding that school classrooms were closed due to the then-pending pandemic; at present, it is the Company’s understanding that school classrooms in its service area are expected to reopen for the coming academic year; notwithstanding this reopening, the Company is continuing to maintain the publicly accessible hotspots that were mentioned in its Broadband Plan; and

(2) The Federal Communications Commission (“FCC”) last year adopted an Emergency Broadband Benefit program, followed this year by the Affordable Connectively Program, both of which provide a discount towards broadband service for eligible households. The Company is participating in these programs.

¹ As used in this Exhibit 3, the term “Company” includes, to the extent applicable, the Company’s affiliate that is an internet service provider.

Set forth below is a revised description of the Company's Broadband Plan, reflecting the above-mentioned modifications.

Pursuant to RCW 80.36.650(3), a recipient of support from the Program is to have adopted a plan to provide, enhance, or maintain 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 potential elements include the following: (1) a multi-year investment plan; (2) specific project(s) that are projected to provide or enhance broadband services 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.

The Company has already constructed facilities sufficient for it to satisfy either criterion three or criterion four of WAC 480-123-110 and, as a result, has placed into service robust broadband infrastructure throughout all populated portions of its service area. Consequently, the Company intends to apply for Program support to allow it to continue to provide telecommunications services and broadband services at the levels that it is providing today, with enhancements where and when appropriate. Accordingly, the Company's plan includes the following elements:

Broadband Plan:

The Company has already built broadband-capable, optical fiber to all existing homes and businesses in its service area. It plans to continue its network-wide process of testing and installation of central office equipment and cutting-over customers from older copper service to these new facilities. While the Company has been and is performing this cutover process on a locality-by-locality basis, any customer who requests the fiber-based service is promptly so connected. Subject to such limiting circumstances, if any, as may be applicable, the Company plans to continue this approach to network upgrades and service connection cutovers. Having such upgrades in place will not only improve existing service levels, but also enhance the Company's ability to deliver higher broadband speeds more quickly in response to specific customer requests and minimize the risk that a sudden surge in demand might exceed the Company's ability to satisfy that demand as swiftly as desired.

As of November 1, 2022, approximately 125 locations remain on copper-based facilities for either voice or broadband services. Approximately 110 locations were converted from copper-based facilities to fiber-optic facilities in 2022. The company expects to transition another 100 customers to fiber-optic facilities in 2023.

The cutover for existing customers, as well as installations for newly constructed homes, requires investment in both equipment and labor. In addition, the Company is investing in and maintaining open WI-FI hotspots to help the community cope with the challenges of the Covid-19 pandemic, and the Company plans to continue this practice for so long as, in the Company's judgment, there is a need for such hotspots for that purpose. At present, it is the Company's understanding that classrooms are open to students and the local school in the Company's service area has worked out how to move teaching online if it becomes necessary again. Although all homes in the Company's service area have access to robust internet speeds up to

300 Mbps, some families either have chosen not to subscribe or cannot afford to subscribe to that service. To help address these circumstances, the Company is maintaining hotspots at locations spread out over its service area. These include at the parking lots of the Rosburg Community Hall, the Company's office, and the Appelo Archives Center. These are designed to complement the Company's existing broadband services in its service area.

The Company has been enabled to do all this largely through its borrowing from the Rural Utilities Service of the United States Department of Agriculture ("RUS"), which has funded the construction of the Company's fiber-to-the-home network, the procurement of the necessary fiber optic cable and associated cable-plant components, as well as the replacements and upgrades to the Company's switching and transport electronics. In turn, such borrowing has been facilitated by the support that the Company has received from Federal universal service programs and the state Universal Communications Services Program.

In addition to the foregoing, the Company's broadband plan includes continued investment by the Company in the maintenance and enhancement of its telecommunications and broadband network through support contracts with its primary equipment vendors, including Calix, Ribbon, and Fujitsu. Such support contracts generally provide for both maintenance of existing platforms, and enhancement of the capabilities those platforms offer as such enhancements become available.

The annual Calix support, maintenance, and software update contract expense is \$8,581.10 for Fiber-to-the-Home network elements.

The annual Ribbon Communications support, maintenance, and software update contract expense is \$25,087.41 to maintain the company's Class 5 voice telephone switch.

The annual Fujitsu SONET support, maintenance, and software update contract expense is \$16,261.91 to maintain the company's SONET interconnection network with other voice service providers and the public-switched telephone network.

Moreover, as part of the Company's broadband plan, the Company participates in the FCC's Emergency Broadband Benefit Program and Affordable Connectivity Program, and the Company expects to continue to do so for so long as the FCC offers those programs.

The Company anticipates that, if its application for support from the Program during the coming Program year is granted, its expenditures during that period in providing, enhancing and maintaining broadband services in its service area, including payments in support of the above-mentioned RUS financing, will exceed the funding that it expects to receive from the Program for that period. This expectation reflects the Company's belief that it will continue to be guided by its goal of providing robust broadband capability wherever such capability is needed within the Company's service area.

Expenses anticipated in 2023 include: \$9,500.00 for quarterly maintenance, testing, and repair of the company's standby power generator; \$12,000.00 to complete electrical grounding repairs to the central offices; \$20,000.00 to repair facility damage due to acts of God and other causes; \$30,000.00 for extending existing facilities to new service locations; \$50,000.00 for line extensions to new roads within the service area; \$5,380.00 for GIS software licensing to comply with Federal broadband reporting requirements.