

JUL 18 2018

FCC Mailroom

**RAINIERconnect**

2516 Holgate St | Tacoma, WA 98402 | www.rainierconnect.com

**REDACTED- FOR PUBLIC INSPECTION**

July 16, 2018

**VIA ELECTRONIC FILING SYSTEM**

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

DOCKET FILE COPY ORIGINAL

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 financial data, in compliance with 47 C.F.R. §§ 54.313 and 54.422

As specified in the Protective Order issued on November 16, 2012 by the Commission, 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 Clausen, Controller  
For Mashell Telecom, Inc. dba Rainier Connect

Enclosures

.cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division  
Mr. Steven V. King, Washington Utilities and Transportation Commission



**THINK INSIDE THE BOX**  
Business and Residential Communications

No. of Copies rec'd 0+1  
List ABCDE

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**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2019
<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
Form Type	54.313 and 54.422

REDACTED - FOR PUBLIC INSPECTION

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

**<210> For the prior calendar year, were there any reportable voice service outages?**

[illegible]

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010>	Study Area Code	522431
<015>	Study Area Name	MAGNELL TELECOM INC
<020>	Program Year	2019
<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
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice	



**(500) Compliance With Service Quality Standards and Consumer Protection Rules**  
**Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010>	Study Area Code	522431
<015>	Study Area Name	NASHVILLE TELECOM INC
<020>	Program Year	2019
<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@zainierconsnet.net
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010>	Study Area Code	522431
<015>	Study Area Name	MAGNETA TELECOM INC
<020>	Program Year	2019
<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
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	522431wa610.pdf

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

522431

MAGHELL TELECOM INC

2019

Danielle Clausen

3608324130 ext.

danielle.claussen@rainierconnect.net

Masshell Telecom, Inc.

Marshall Inc.

Masbell Telecom, Inc.

<a1>

## Affiliates

SAC

pany

-- See attached worksheet	--
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Study Area Code

Study Area Name

MAGHELL, TELECOM INC

Program Year

2019

Contact Name - Person USAC should contact regarding this data

**Danielle Clausen**

Contact Telephone Number - Number of person identified in data line &lt;030&gt;

3608324130 ext.

Contact Email Address - Email Address of person identified in data line &lt;030&gt;

[danielle.clausen@rainierconnect.net](mailto:danielle.clausen@rainierconnect.net)

No

\_\_\_\_\_

\_\_\_\_\_

<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

<925> Compliance with Land Use permitting requirements

<926> Compliance with Facilities Siting rules

<920> 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.



<b>(1000) Voice and Broadband Service Rate Comparability Data Collection Form</b>		<b>FCC Form 481 OMB Control No. 3050-0986/OMB Control No. 3050-0819 July 2018</b>
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<010>	Study Area Code	522431
<015>	Study Area Name	NASHVILLE TELECOM INC
<020>	Program Year	2019
<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

<1000> Voice services rate comparability certification **Yes**

522431wa1010.pdf

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

<b>(1100) No Terrestrial Backhaul Reporting</b>		<b>FCC Form 481</b>	
<b>Data Collection Form</b>		<b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b>	
		<b>July 2018</b>	

<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2019
<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

<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes
--------	--	-----

<1130>		
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<1140>	Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.	
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<b>(1200) Terms and Condition for Lifeline Customers</b>		<b>FCC Form 481</b>	
<b>Lifeline</b>		<b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b>	
<b>Data Collection Form</b>		<b>July 2018</b>	

<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2019
<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

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website      HTTP    <https://www.rainierconnect.com/legal-notices/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.

(2005) 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 2018

<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035>	Contact Telephone Number - Number of person identified in data line <030>	3609324130 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of 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(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

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)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2017.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



(3005) Rate Of Return Carrier Additional Documentation Data Collection Form		FCC Form 481 OMB Control No. 3060-0966/OMB Control No. 3060-0819 July 2018	
<010>	Study Area Code	522431	
<015>	Study Area Name	MASHELL TELECOM INC	
<020>	Program Year	2019	
<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	

## CAF BLS Reporting

(3008A)	Please indicate whether new locations were deployed during the prior calendar year.	(Yes/No)	Yes
(3008B)	Please enter the number of new locations deployed in the prior calendar year associated with each of the following speed tiers.		
(3008B1)	Number of newly built locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.		0
(3008B2)	Number of newly built locations with access to broadband speeds of 25/3 Mbps or higher.		1189
(3008C)	Please provide the percentage of deployment across the entire study area.		

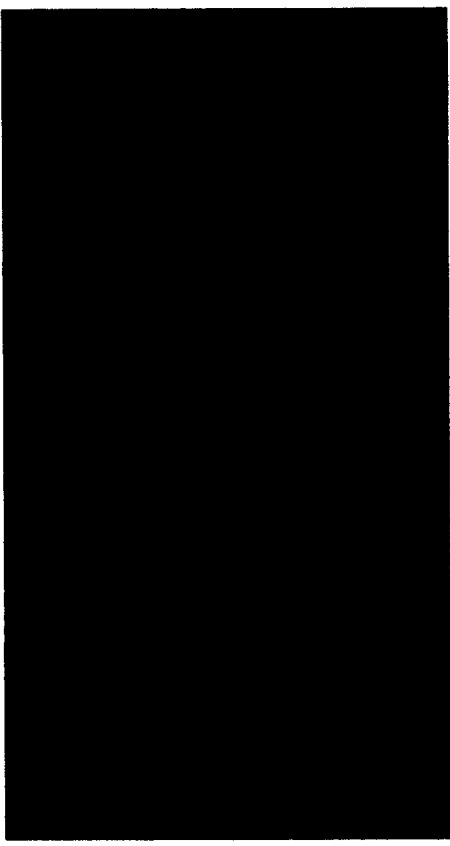
<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035>	Contact Telephone Number - Number of person identified in data line <030>	3608324130 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure 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.

<b>Progress Report on 5 Year Plan</b>	
(3009)	Carrier certifies to 54.313(f)(1)(iii)
Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations (47 CFR § 54.313(f)(1)(i))
(3010B)	Please Provide Attachment
(3012A)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))
(3012B)	Please Provide Attachment
(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
<div style="display: flex; justify-content: space-around;"> <div> <p>(Yes/No)</p> <p><input checked="" type="radio"/> <input type="radio"/></p> </div> <div> <p>(Yes/No)</p> <p><input checked="" type="radio"/> <input type="radio"/></p> </div> </div>	
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:	
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation
(3018)	If the response is no on line 3014, is your company audited?
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 Borrowers
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
(3021)	Management letter and/or audit opinion 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)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows
(3026)	Attach the worksheet listing required information

(10102) Date of Return Courier Additional Documentation (Continued) Data Collection Form		FCC Form 481 OMB Control No. 3008-0186/OMB Control No. 3008-0039 July 2018
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Q1D> Study Area Code	522431
Q1S> Study Area Name	MAGBELL TELECOM INC
Q2D> Program Year	2019
Q3D> Contact Name - Person USAC should contact regarding this data	Danielle Clausen
Q3S> Contact Telephone Number - Number of person identified in data line Q3D>	3608324130 ext.
Q3P> Contact Email Address - Email Address of person identified in data line Q3D>	danielle.clausen@telinconnect.net



<010>	Study Area Code	522431
<015>	Study Area Name	MAURELL TELECOM INC
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035>	Contact Telephone Number - Number of person identified in data line <030>	3609324130 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

**4005 Rural Broadband Experiment**

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

**Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)**

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

**Community Anchor Institutions – FCC 14-98 (paragraph 79)**

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

**4003b.** Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Name of Attached Document Listing Required Information



<010>	Study Area Code	922431
<015>	Study Area Name	RADELL TELECOM INC
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035>	Contact Telephone Number - Number of person identified in data line <030>	3609324139 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net

5005 Alaska Plan

(5010) Do you participate in the Alaska plan? (Yes/No)

(5011) Please indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas previously served exclusively by performance-limiting satellite backhaul. (Yes/No)

(5012) If the filing carrier identified in its approved performance plans that it relies exclusively on satellite backhaul for a certain portion of the population in its service area, indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas that were previously served exclusively by satellite backhaul. (Yes/No)

[illegible]

Certification - Reporting Carrier  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010> Study Area Code	522431
<015> Study Area Name	MASHELL TELECOM INC
<020> Program Year	2019
<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

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 07/12/2018
Printed name of Authorized Officer: Brian Haynes	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 3608324130 ext.	
Study Area Code of Reporting Carrier: 522431	Filing Due Date for this form: 07/16/2018
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.	

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Certification - Agent / Carrier  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2018

<010> Study Area Code	522431
<015> Study Area Name	MAGHELL TELECOM INC
<020> Program Year	2019
<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

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: _____	
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 Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
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.	

REDACTED - FOR PUBLIC INSPECTION

## Attachments



**FCC Form 481**  
**OMB Control No. 3060-0986/OMB Control No. 3060-0819**  
**July 2018**

[illegible]

Response Line 610  
Mashell Telecom, Inc.  
Study Area 522431

Functionality in Emergency Situations:

Voice & Broadband Network

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 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.

Response to Line 1010  
Mashell Telecom, Inc.  
Study Area 522431

### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Mashell Telecom, Inc. ("Company") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$45.38 as specified in Public Notice DA 17-1093 issued on November 8, 2017. Company's current total residential local end-user rate<sup>1</sup> of \$18.00 (which includes a local fee of \$18.00, mandated state fees of \$0.00 and mandatory extended area service charges of \$0.00) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response Line 3010  
Mashell Telecom, Inc.  
Study Area 522431

**Certification of Public Interest Obligations**

Pursuant to 47 C.F.R. § 54.202(a) Mashell Telecom, Inc. ("Company") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time.



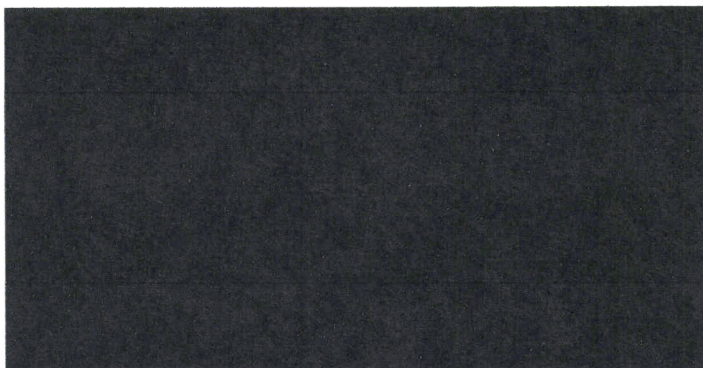
NAVIGATION

**Reports**

[Op. Report-Telecom](#)  
[Certification](#)  
[Point Of Contact](#)  
[Part A](#)  
[Part B](#)  
[Part C](#)  
[Part D](#)  
[Part E](#)  
[Part F](#)  
[Part G](#)  
[Part H](#)  
[Part I](#)  
[Notes](#)

## Borrower Point Of Contact Information

*Your response is required by 7 U.S.C. 901 et seq. and subject to federal laws and regulations regarding confidential information, will be treated as confidential.*



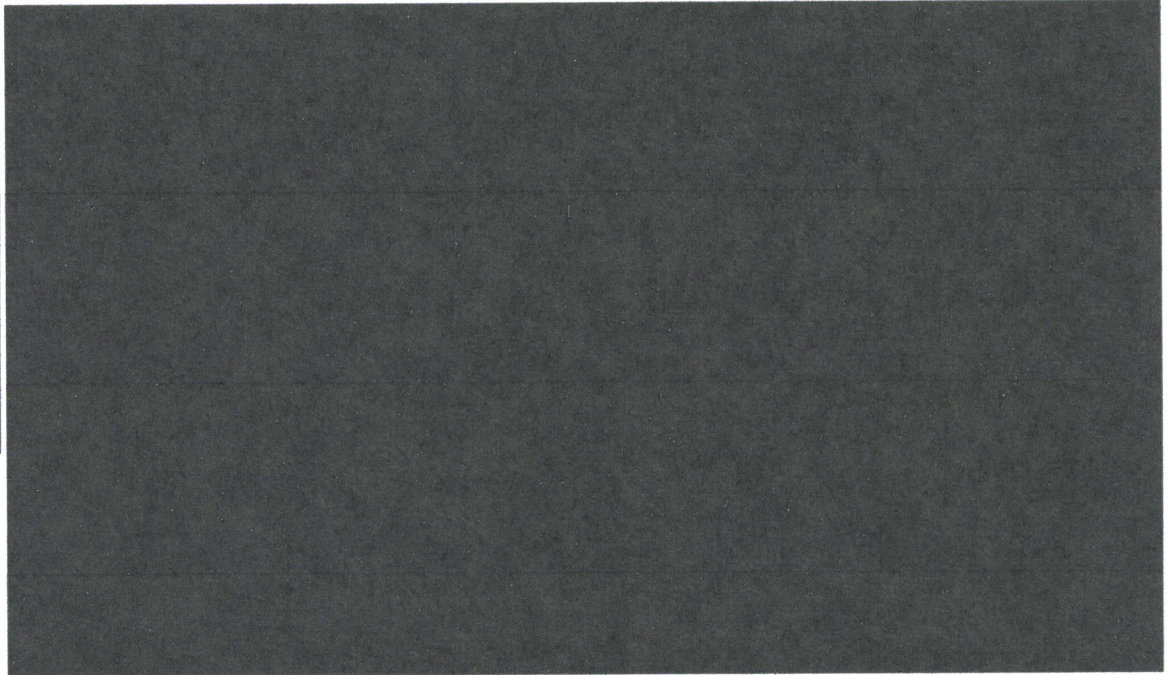




NAVIGATION

**Reports**

[Op. Report-Telecom  
Certification](#)  
[Point Of Contact](#)  
[Part A](#)  
[Part B](#)  
[Part C](#)  
[Part D](#)  
[Part E](#)  
[Part F](#)  
[Part G](#)  
[Part H](#)  
[Part I](#)  
[Notes](#)



[Save](#)



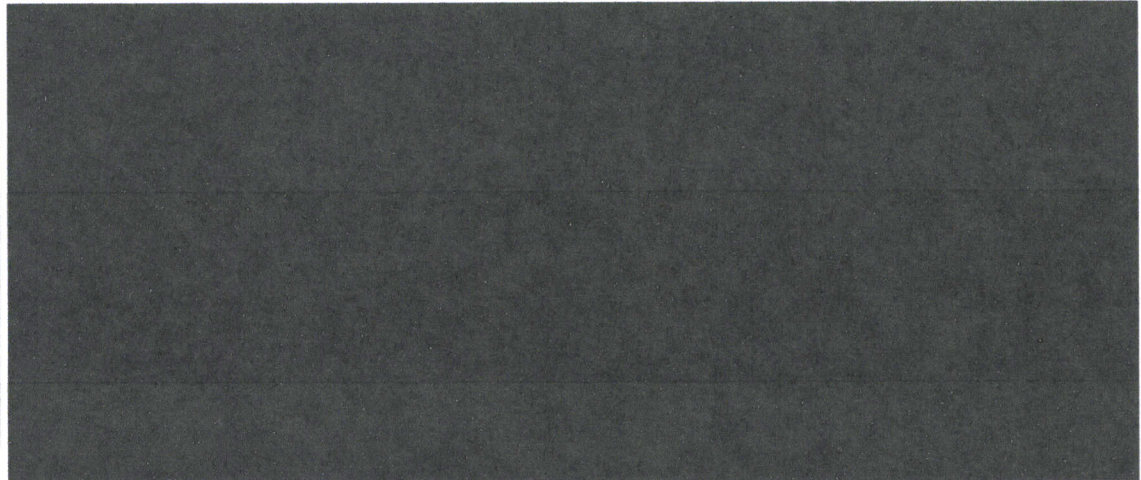
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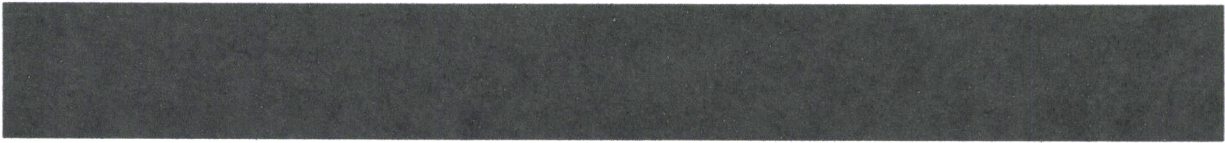
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**Part A: Balance Sheet**

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The Balance Prior Year figures have been brought forward from the December 2016 submission and cannot be edited here. If these figures need to be corrected please revise them in that submission and resubmit.

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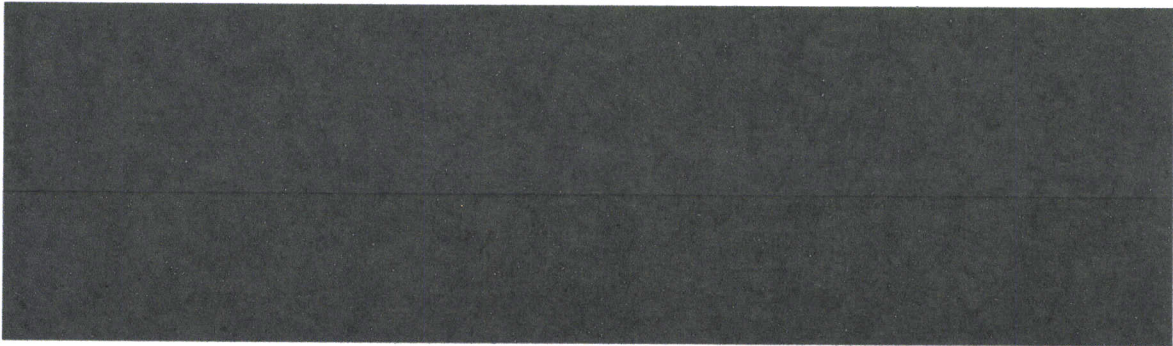
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## Part B: Statements of Income and Retained Earnings or Margins

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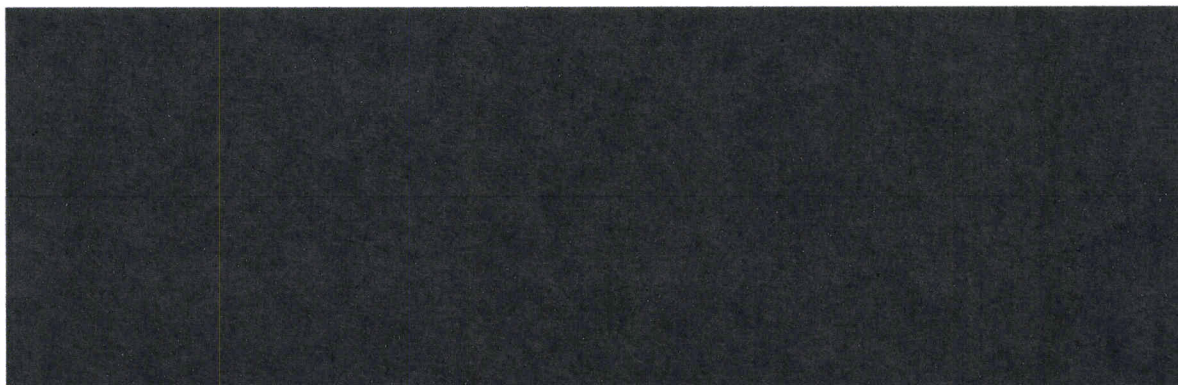
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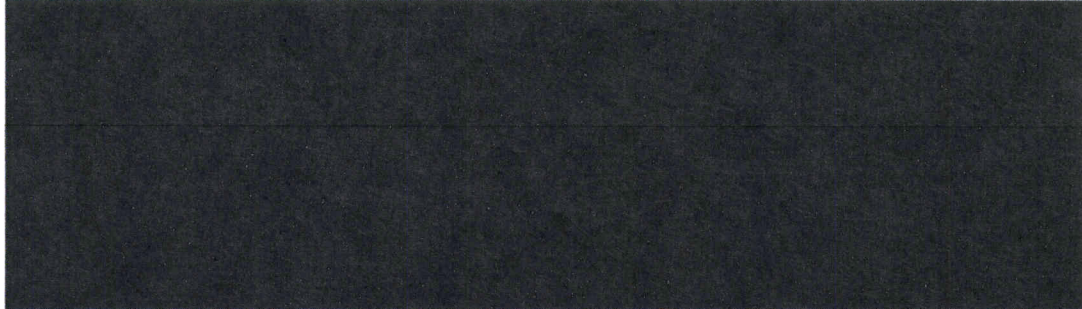
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## Part D: System Data

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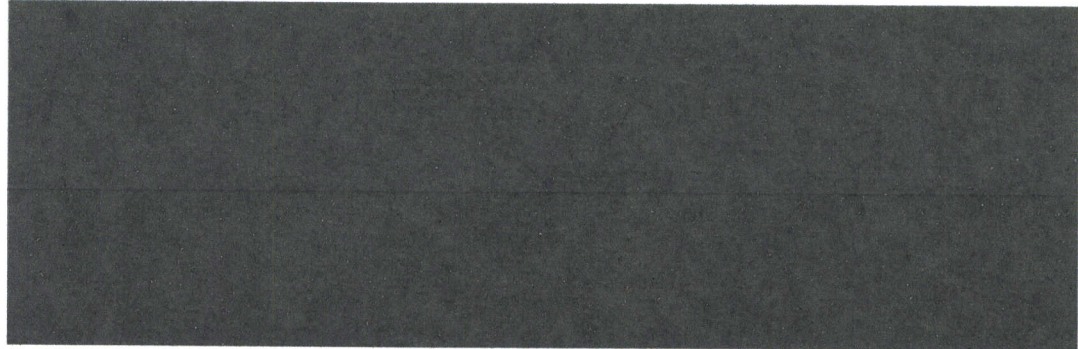
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## Part F: Funds Invested In Plant During Year

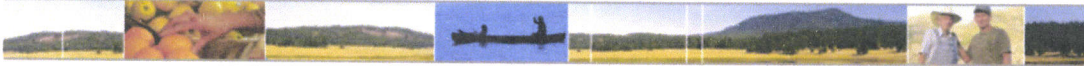
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## Part G: Investments In Affiliated Companies

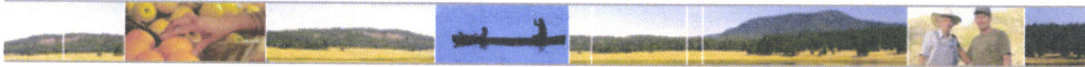
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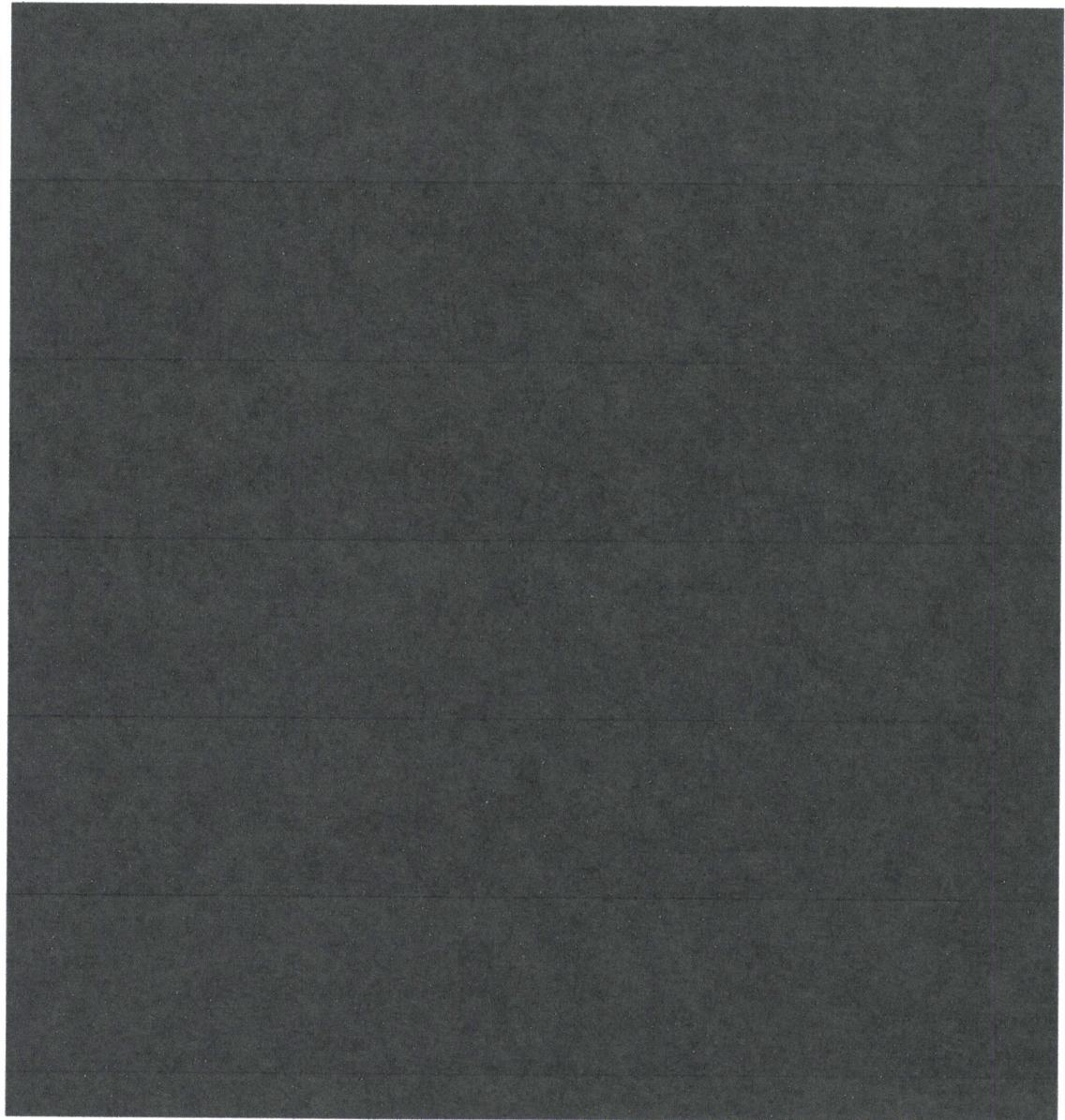
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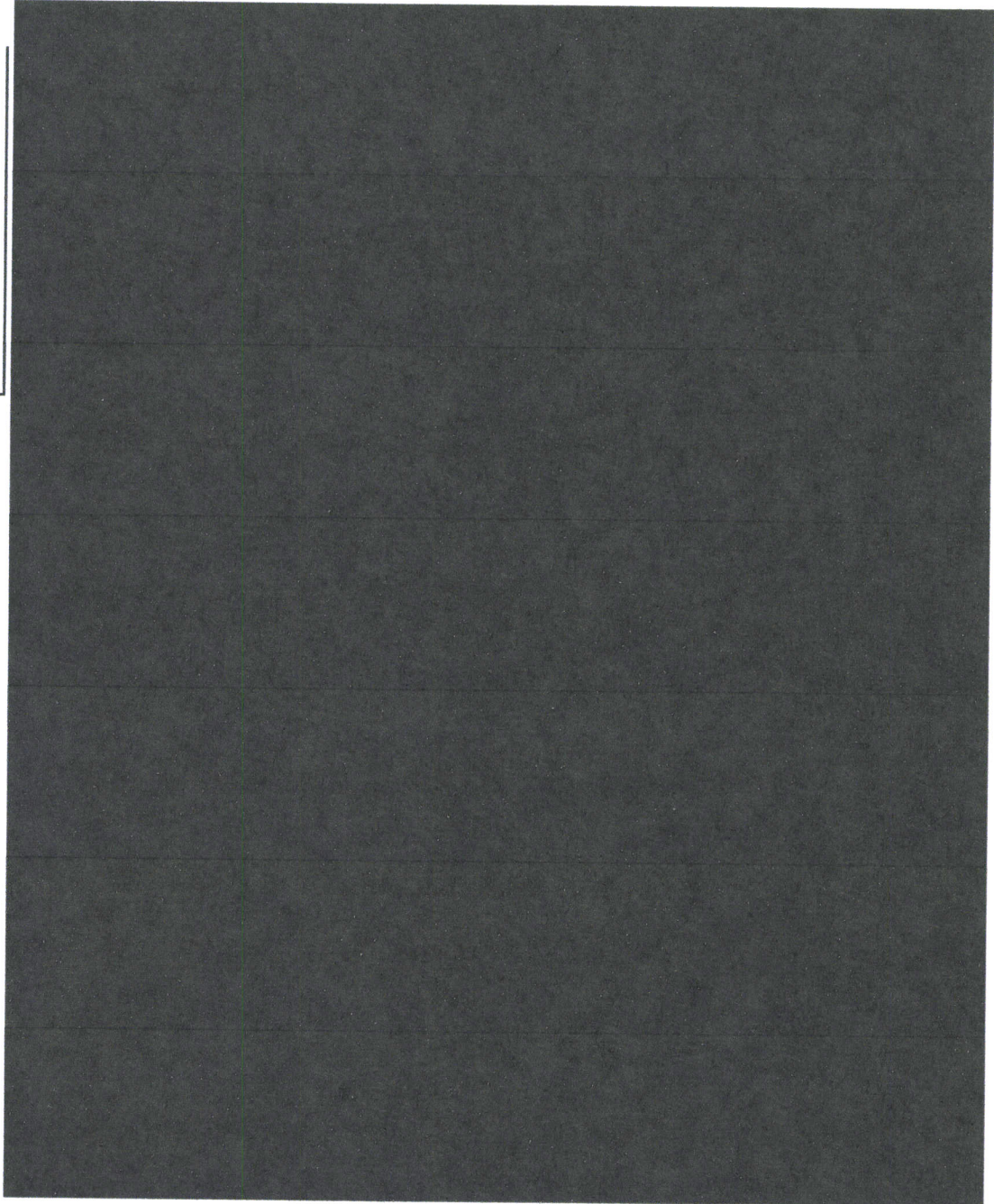
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