
Redacted per WAC 480-07-160

August 25, 2023

Sent via WUTC Electronic Filing Portal

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
Aug 25, 2023

Re: UT-230524 ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber - Eligible Telecommunications Carriers' Annual Recertification Supplemental Filing

Dear Director Maxwell:

Enclosed for filing is ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber's ("ZiPLY Fiber") supplemental filing for 2023 ETC Annual Recertification. The Company considers financial information submitted with this filing confidential and protected under the provisions of WAC 480-07-160. These items are marked "Confidential per WAC 480-07-160". The Company, for commercial reasons, may be harmed if this information is not treated by the Commission as confidential. A confidential and redacted copy of the filing is enclosed.

1. WAC 480-123-060(1) – Certification of Eligible Telecommunications Carrier

ANSWER:

A revised certification is attached.

2. WAC 480-123-070(1)(a) – Report on Use of Federal Funds and Benefits to Customers:

- a) ZiPLY Fiber Northwest stated that "in 2022, ZiPLY Fiber received [REDACTED] in federal high cost and Rural Digital Opportunity Fund support." other than the Rural Digital Opportunity Fund, what other federal high-cost support did ZiPLY Fiber Northwest receive in 2022?

ANSWER:

In 2022, ZiPLY Fiber only received funds from the Rural Digital Opportunity Fund.

- b) ZiPLY Fiber Northwest provided a list of five investments made and expenses incurred by the company in 2022. Please expand in detail on the 5 investments and expenses the company incurred.

ANSWER:

In 2022, Ziplly Fiber received [REDACTED] in Rural Digital Opportunity Fund (“RDOF”) support. These funds, along with other revenues, enabled the Company to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. Examples of the overall investments made, and expenses incurred by the Company in 2022 are:



In 2022, Ziplly Fiber used [REDACTED] of the RDOF award for build preparation and materials purchase. The remainder of the 2022 award will be used in the coming years to complete the identified build locations. The following exchanges were impacted in this initial expenditure:

- Anacortes
- Arlington
- Darrington
- Granite Falls
- Lyman
- Maple Falls
- Marblemount
- Monroe
- Stanwood
- Sultan
- Sumas

3. WAC 480-123-070(1)(b) – Report on Use of Federal Funds and Benefits to Customers:

- a) Please provide how the consumers benefited from the investments and expenses made with support in 2022.

ANSWER:

Ziplly Fiber investments and expenses paid with federal high-cost fund support benefitted consumers in the following ways: These federal high cost funds were used to extend high speed broadband or voice services to consumers eligible for ACP and/or Lifeline services. In addition, federal high cost funds were used to assist with designing and extending high speed broadband services to unserved and underserved consumers in largely rural areas throughout Washington.

4. WAC 480-123-080(1) – Annual Plan for Universal Service Support Expenditures.

ANSWER:

ZiPLY Fiber plans on investing approximately [REDACTED] in 2024. The primary areas expected to receive the investment are:

- Acme
- Maple Falls
- Concrete
- Darrington
- Arlington
- Deming
- Farmington

5. WAC 480-123-080(2) – Substantive Plan of Investments and Expenditures.**ANSWER:**

A major area of our focus in 2024 on the RDOF build will be in the largest areas of the award in Washington. We anticipate major build activity on the Hwy 530 corridor between Arlington and Darrington. Additionally, we anticipate build activity to begin in both the Acme and Deming areas in that large RDOF geography. In the areas, where we are building the properties are expected to go from underserved and unserved to being able to get at least 1 Gigabit symmetrical services.

Additional Questions**6. RDOF**

The Washington Utilities and Transportation Commission (UTC), In collaboration with the Washington State Broadband Office (WSBO) is requesting that ZiPLY Fiber Northwest provide information showing the specific census blocks that ZiPLY Fiber Northwest will deploy broadband to meet its interim 40% broadband buildout obligation associated with RDOF support.

- a) Does ZiPLY Fiber Northwest believe it will be able to deploy to 40% (or more) of its obligation by the December 31, 2025, timeline?

ANSWER:

Yes, ZiPLY Fiber believes it will be able to deploy 40% or more of it's obligation by the December 31, 2025 deadline.

- a) To your knowledge, are there any areas in your study area that the company will not be deploying broadband? What last mile technology will be deployed? What is your planned 2024 capital expenditures to continue or start putting the infrastructure in place to meet your 2025 and subsequent broadband buildout obligation?

ANSWER:

There are not any areas in the Ziplly Fiber study area awarded under RDOF that the company is aware that broadband will not be deployed. Ziplly Fiber will deploy fiber optic cable and electronics capable of symmetrical gigabit service as last mile technology consistent with the RDOF auction bid. Ziplly Fiber plans on investing approximately [REDACTED] 2024. See the response under question 4 for additional details.

7. Tribal Relation

- a. Does Ziplly Fiber Northwest currently have a tribal outreach plan in place for services and equipment located on or provided to tribals lands of Washington state?
- b. Does Ziplly Fiber Northwest currently have a tribal liaison? If so, please share for information purposes only.

ANSWER:

Ziplly Fiber has an outreach plan in place for services and equipment located on or provided to Tribal lands of Washington State. The Ziplly Fiber tribal liaison is Chris St Germaine, Local Partnerships Manager.

If you have any questions concerning this report, please contact me at (503) 431-0458.

Sincerely,



Jessica Epley
VP - Regulatory & External Affairs