

Date: September 17, 2025

To: Docket UT-250672

From: Jodi McBride, Regulatory Analyst, Licensing Division

Subject: UT-250672, Eaton Fiber Washington, LLC (Eaton, or applicant)

Background

On September 2, 2025, Eaton filed an application for registration as a competitively classified telecommunications company.

Scope

Telecom registrations must include the applicant company's most current balance sheet; and its latest annual report, if applicable. RCW [80.36.350](#)

The commission may deny an application for registration if the applicant does not possess adequate financial resources to provide the proposed services. A hearing is required to deny application. WAC [480-121-040](#).

The role of licensing in reviewing an application is a minimum balance sheet requirement.

Discussion

On the application form the Current Balance Sheet and Latest Annual Report boxes were not checked, however financial documentation was submitted in support of the application. Eaton is a newly formed entity that does not have its own financial statement or balance sheet. Tillman Global Holdings IX, LLC (Tillman) is the parent company for Eaton. Tillman filed a letter of guarantee on behalf of Eaton in which Tillman committed to providing financial resources required of Eaton as well as to satisfy obligations made by Eaton in furtherance of the UTC telecom registration.

In support of the current registration, Eaton submitted Tillman's balance sheet. The financial documents shows that the total assets equal the sum of the total liabilities and the total shareholders' equity, so the balance sheet filed is in fact in balance.

RCW [80.36.300](#)(5) states that the legislature's policy for the State of Washington is, among other things to, "Promote diversity in the supply of telecommunications services and products in telecommunications markets throughout the state." The minimum balance sheet requirement has been met.

Recommendation

Staff recommends that the Commission secretary grant the application without hearing.