

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

FRONTIER COMMUNICATIONS
NORTHWEST, LLC D/B/A ZIPLY FIBER,

Complainant,

v.

KALAMA TELEPHONE COMPANY,

Respondent.

DOCKET UT-200751

ANSWER TO COUNTERCLAIM

Frontier Communications Northwest, LLC d/b/a Ziplly Fiber (Ziplly Fiber), answers the counterclaims made by Kalama Telephone Company (Kalama) in this proceeding and responds as follows:

- 1 As to paragraph 1 of Kalama's counterclaim, Ziplly Fiber denies the allegation.
- 2 As to the first sentence in paragraph 2, Ziplly Fiber denies the allegation. As to the second sentence in paragraph 2, Ziplly Fiber admits providing telecommunications service to some locations in the Kalama exchange under its WUTC Competitive Telecommunications Company certificate.
- 3 Paragraph 3 is denied. Ziplly Fiber and its three lineal corporate predecessors (GTE Northwest Inc., Verizon Northwest Inc., and Frontier Communications Northwest Inc.) hold or held WUTC certificates as Competitive Telecommunications Companies.
- 4 Paragraph 4 is denied.
- 5 Paragraph 5 is denied. See also response to paragraph 3 above.
- 6 As Ziplly Fiber has committed no wrongdoing, and to the extent that the allegations in paragraph 6 presume a legal conclusion, they are denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "George Baker Thomson, Jr.", with a stylized flourish at the end.

George Baker Thomson, Jr.
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PROOF OF SERVICE

I HEREBY CERTIFY that I, as an employee of Frontier Communications Northwest, LLC dba Ziplly Fiber, have served on September 29, 2020 the parties of record in this proceeding a true copy of the following document(s):

Answer to Counterclaim

The document(s) was/were mailed and/or emailed to each of the parties of record in this docket. Each envelope was addressed to the address shown in the official file, with the required first-class postage, and deposited on this date in the United States mail in the City of Everett, County of Snohomish, State of Washington.



Shannon Lipp, Legal Assistant

PARTIES OF RECORD AND OTHERS RECEIVING NOTICE**NOTIFIED BY EMAIL:**

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