

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010> Study Area Code	522449
<015> Study Area Name	Frontier Communications Northwest, Inc.
<020> Program Year	2022
<030> Contact Name: Person USAC should contact with questions about this data	Jessica Epley
<035> Contact Telephone Number: Number of the person identified in data line <030>	5034310458 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	jessica.epley@ziply.com
Form Type	54.313 and 54.422



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

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<039>	Contact Email Address - Email Address of person identified in data line <030>	jessica.epley@ziply.com
<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**

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<515>	Certify compliance with applicable minimum service standards	

**(600) Functionality in Emergency Situations  
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<039> Contact Email Address - Email Address of person identified in data line <030>	jessica.epley@ziply.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	522449WA610.pdf



**(900) Tribal Lands Reporting  
Data Collection Form**

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<900> Does the filing entity offer tribal land services? (Y/N) Yes

Nooksack Indian Tribe, Colville Tribes, Lummi Nation, Shoalwater Bay Tribe, The Tulalip Tribes of Washington

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

522449WA920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <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
- <926> 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.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 522449WA1010.pdf

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Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 522449WA1030.pdf

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Name of Attached Document



<b>(1100) No Terrestrial Backhaul Reporting Data Collection Form</b>	<b>FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 December 2020</b>
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<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<1140> Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.

<b>(1200) Terms and Condition for Lifeline Customers</b> <b>Lifeline</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>December 2020</b>
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<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP <https://ziplyfiber.com/corporate/terms>

“Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <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.
✓

<b>(2005) Price Cap Carrier Additional Documentation</b> <b>Data Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 December 2020
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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) Not Applicable

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband Not Applicable

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient? Yes

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2018. 1199645

<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 522449WA2018.xlsm

**Connect America Phase II – FCC Form 470 Postings**

<2019> For the filing due July 1 following full implementation of this requirement, answer yes, no, or not applicable to this certification request Not Applicable

**(3005) Rate Of Return Carrier Additional Documentation**  
Data Collection Form

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(3007) Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator?

(3007a)	(3007b)
Name of Consultant	Name of Consultant Firm/Third Party

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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.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}			
(3010B)	Please Provide Attachment <b>Rate-of-Return Community Anchor Institutions</b>	Name of Attached Document Listing Required Information		<input type="text"/>
(3012A)	Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.			
(3012B)	Please Provide Attachment Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(f)(1)(ii)	Name of Attached Document Listing Required Information		<input type="text"/>
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input type="radio"/> <input type="radio"/>	
(3014)	If yes, does your company file the RUS annual report 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:	(Yes/No)	<input type="radio"/> <input type="radio"/>	
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information		<input type="text"/>
(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:	(Yes/No)	<input type="radio"/> <input type="radio"/>	
(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		<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>	
(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:		<input type="checkbox"/>	
(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		<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information		<input type="text"/>

<b>(3005) Rate Of Return Carrier Additional Documentation (Continued)</b>	FCC Form 481
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**Financial Data Summary**

(3027) Revenue	<input type="text"/>
(3028) Operating Expenses	<input type="text"/>
(3029) Net Income	<input type="text"/>
(3030) Telephone Plant In Service(TPIS)	<input type="text"/>
(3031) Total Assets	<input type="text"/>
(3032) Total Debt	<input type="text"/>
(3033) Total Equity	<input type="text"/>
(3034) Dividends	<input type="text"/>

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#### 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.

#### RBE Community Anchor Institutions

<4003a> Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year

<4003b> Please Provide Attachment: Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by FCC 14-98 (paragraph 79)

Name of Attached Document Listing Required Information





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<6010> Enter the total amount of Phase II Auction Support, if any, the carrier used for capital expenditures

#### Phase II Auction and New York Funds Certification

<6011> Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient's penultimate year of support (Yes/No)

#### Phase II Auction Community Anchor Institutions

<6012a> Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year

<6012b> Please Provide Attachment Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by FCC 14-98 (paragraph 79) Name of Attached Document Listing Required Information

#### Phase II Auction FCC Form 470 Postings

<6013> For the filing due July 1 following full implementation of this requirement answer yes or no to this certification request

#### Phase II Auction Post-Final Deployment Milestone Performance Certification

<6014> Starting the first July 1st after meeting the final service milestone, certify (yes or no) that the Phase II-funded network that the Phase II auction recipient operated in the prior year meets the relevant performance requirements in § 54.309

<b>(7005) Phase-Down Support Reporting Data Collection Form</b>	<b>FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 December 2020</b>
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<7010> Phase II Auction recipient performance requirements certification (Yes/No)

<b>(8005) Uniendo a Puerto Rico Fixed and Mobile Funds Certification Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>December 2020</b>
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<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	jessica.epley@ziplay.com

**<8010> Uniendo a Puerto Rico Stage 2 Fixed – Capital Expenditures**  
Enter the total amount of Uniendo a Puerto Rico Stage 2 fixed support, if any, the carrier used for capital expenditures.

**<8011> Uniendo a Puerto Rico Stage 2 Fixed – Available Funds Certification**  
Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient’s penultimate year of support.

**<8012a> Uniendo a Puerto Rico Stage 2 Fixed – Community Anchor Institutions**  
Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

**<8012b> Uniendo a Puerto Rico Stage 2 Fixed – Community Anchor Institutions**  
Please Provide Attachment  
Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(e)(2)(A). Allowable File Types.

	Name of Attached Document Listing Required Information
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**<8013> Uniendo a Puerto Rico Stage 2 Fixed – FCC Form 470 Postings**  
For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

**<8014> Uniendo a Puerto Rico Stage 2 Fixed – Post-Final Deployment Milestone Performance Certification**  
Starting the first July 1st after meeting the final service milestone, certify (yes or no) that the Uniendo a Puerto Rico Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in § 54.309.

**<8020> Uniendo a Puerto Rico Stage 2 Fixed – Support Reimbursement Certification**  
54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

**<8030> Uniendo a Puerto Rico Stage 2 Fixed – Disaster Preparedness and Response Documentation**  
54.313(n): Recipients of fixed support from Stage 2 of the Uniendo a Puerto Rico Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

**<8040> Uniendo a Puerto Rico Stage 2 Mobile – Support Reimbursement**  
54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 mobile support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

**<8050> Uniendo a Puerto Rico Stage 2 Mobile – Disaster Preparedness and Response Documentation**  
54.313(n): Recipients of mobile support from Stage 2 of the Uniendo a Puerto Rico Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation

**<8060> Uniendo a Puerto Rico Stage 2 Mobile – Mobile Disbursements Certification**  
54.313(o): Recipients of Uniendo a Puerto Rico Fund Stage 2 mobile support shall certify that they are in compliance with all requirements for receipt of such support to continue receiving Stage 2 mobile disbursements

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<9010> **Connect USVI Stage 2 Fixed – Capital Expenditures**

Enter the total amount of Connect USVI Fund Stage 2 fixed support, if any, the carrier used for capital expenditures.

<9011> **Connect USVI Stage 2 Fixed – Available Funds Certification**

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1st after receiving support until the recipient's penultimate year of support.

<9012a> **Connect USVI Stage 2 Fixed – Community Anchor Institutions**

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

Please Provide Attachment

<9012b> Using link, download template and list the number, name and address for each community anchor institution. Attach the document which contains the community anchor institution details as required by 47 C.F.R. § 54.313(e)(2)(i)(A). Name of Attached Document Listing Required Information

**Connect USVI Stage 2 Fixed – FCC Form 470 Postings**

<9013> For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

**Connect USVI Stage 2 Fixed – Post-Final Deployment Milestone Performance Certification**

<9014> Starting the first July 1st after meeting the final service milestone, certify (yes or no) that the Connect USVI Fund Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in § 54.309.

**Connect USVI Stage 2 Fixed – Support Reimbursement Certification**

<9020> 54.313(n): Recipients of Connect USVI Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund.

**Connect USVI Stage 2 Fixed – Disaster Preparedness and Response Documentation**

<9030> 54.313(n): Recipients of fixed support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

**Connect USVI Fund Stage 2 Mobile - Support Reimbursement Certification**

<9040> 54.313(n): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund. Recipients of mobile support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

**Connect USVI Fund Stage 2 Mobile - Disaster Preparedness and Response Documentation**

<9050> 54.313(n): Recipients of mobile support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and response documentation.

**Connect USVI Fund Stage 2 Mobile - Mobile Disbursements Certification**

<9060> 54.313(o): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that they are in compliance with all requirements for receipt of such support to continue receiving Stage 2 mobile disbursements.

<b>Certification - Reporting Carrier Data Collection Form</b>	<b>FCC Form 481</b> OMB Control No. 3060-0986/OMB Control No. 3060-0819 December 2020
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
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:	Frontier Communications Northwest, Inc.
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date 06/25/2021</span>
Printed name of Authorized Officer:	Jessica Epley
Title or position of Authorized Officer:	Director, Regulatory & External Affairs
Telephone number of Authorized Officer:	5034310458 ext.
Study Area Code of Reporting Carrier:	522449 <span style="float: right;">Filing Due Date for this form: 07/01/2021</span>
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.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 December 2020
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<010>	Study Area Code	522449
<015>	Study Area Name	Frontier Communications Northwest, Inc.
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Jessica Epley
<035>	Contact Telephone Number - Number of person identified in data line <030>	5034310458 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jessica.epley@ziply.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
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:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
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.	

Certify Filing  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
December 2020

<010>	Study Area Code	522449
<015>	Study Area Name	Frontier Communications Northwest, Inc.
<020>	Program Year	2022
<030>	Contact Name - Person USAC should contact regarding this data	Jessica Epley
<035>	Contact Telephone Number - Number of person identified in data line <030>	5034310458 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jessica.epley@ziply.com

I certify under penalty of perjury that no universal service support has been or will be used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services produced or provided by any company designated by the Federal Communications Commission as posing a national security threat to the integrity of communications networks or the communications supply chain since the effective date of the designations

Yes

Please Provide Waiver Document  
Allowable File Type (pdf only)

Name of Attached Document Listing Required  
Information

## Attachments





## Line 610 – Zply Fiber’s Description of Functionality in Emergency Situations

In December 2013, the FCC adopted new rules to promote 911 resiliency, including requesting annual certification of substantial progress towards meeting these new requirements starting in October 15, 2015 (Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies, 28 FCC Rcd 17476 (2013); and Public Safety and Homeland Security Bureau Announces Effective Dates of 911 Reliability Certification and PSAP Outage Notification Requirements, Public Notice, 29 FCC Rcd 13900 (2014)). Zply Fiber this year again filed its certification that it is meeting the FCC's substantial progress goals.

### (1) Circuit auditing

- Zply Fiber conducts quarterly reviews of PSAPS diversity, semiannual reviews of end offices diversity, and at installation or modification of any E911 circuit.
- **Zply Fiber tags all circuits in our internal tracking software.**
- Zply Fiber continues to work to resolve areas where we are single homed with no diversity.

### (2) Backup power:

- All Zply Central Offices hosting a Selective Router or directly serving a PSAP, provide for emergency power distribution via direct current battery strings sized at minimum to hold for PUC defined time in Amp hours. The DC power rectification systems are supported by on-site generators that are started automatically upon voltage drop detection and load is transferred once generator is operating. Most sites maintain on-site reserves to run for 72 hours prior to refueling. Sites that do not have stationary generators are provided trailer mounted portable generators and fuel to run for a minimum of 24 hours. In 2020, Zply replaced 16 DC rectifier plants, 22 site battery back-up systems, repair or replaced 7 stationary generators and added 12 trailer mounted portable generators to the fleet at a material and labor cost of roughly \$7M. In 2021, approximately \$11M has been spent in upgrades of AC switchgear, DC rectifier plants, DC Battery back-up systems and stationary generators of which approximately 45% have been deployed as of mid Q2.
- Many of our locations are serviced and maintained by vendors (Power Systems West – ID and MT; Pete Kelly) – OR; Cummins – OR; John Mayer – WA)
- Local Central Office Technicians do the monthly and weekly tests.
- Local Central Office Technicians also do a monthly Planned Maintenance Program of the generator which includes a run and functional check of the ATS. These are documented and logged electronically in the PMP system.
- The generators and transfer switches are maintained every 18 months except the mountain tops which are done on a yearly basis. There is a generator PM log kept either in the control panel (portable generators) or in the ATS’s (stationary units).
- All Zply Central Offices hosting a Selective Router or directly serving a PSAP, that have a stationary generator are controlled via an automatic transfer switch as well as a roll up “pin & sleeve” connection and manual transfer switch as well to accommodate a secondary trailer mounted roll up generator if needed. In 2021, many sites are getting replacement ATS/MTS gear as well as higher amperage rated “quick connect” roll up connection boxes.
- All multi-gen configurations are either designed for use via manual tie breaker or paralleling systems that start generators independently and phase balance before load transfer. In 2021, paralleling gear is being replaced or redesigned in two of Zply largest Central Offices (CRALIDXX and BVTNORXB)

(3) Network monitoring:

- Daily reporting on all aggregation devices carrying E911 circuits that exhibit issues or stop reporting through our third-party network monitoring vendor (IBM Netcool)
- Monitoring links will report as down notifications are sent to a separate third-party monitoring vendor (TruSight) for triage and repair
- Where we have diversity, 24/7 monitoring is managed by the Ziplly Fiber Network Operation Center
- As diverse circuits are added, monitoring is transitioned to the Ziplly Fiber Network Operations Center

During the month of October 2020, the company contacted the respective tribal leader for each Tribal Land identified on line 910 by sending, via United Parcel Service, an Annual Tribal Government Engagement letter, an example of which is included as "Attachment A." As explained therein, Frontier representatives are available to meet with Tribal leaders to discuss their ongoing communication goals, needs and priorities concerning the deployment and improvement of communications services on Tribal lands.

## Attachment A



October 8, 2020

Mr. Ross Cline Sr., Chairman  
Nooksack Indian Tribe  
5016 Deming Road  
Deming, WA 98244

Dear Chairman Cline,

Zipty Fiber is honored to be the telecommunications service provider on your Tribal lands. We know that priorities and plans of individual Tribal governments are unique; therefore, I would like to extend an invitation to meet at your convenience in order to discuss any matters you would like to talk about such as: (1) deployment planning with a focus on Tribal community anchor institutions; (2) feasibility and sustainability planning; (3) marketing services on Tribal lands; (4) rights-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review process; and (5) Tribal business and licensing requirements.

In addition, we wanted to be sure that you are aware of a government assistance program known as Tribal Lifeline. The enhanced Tribal Lifeline program was implemented by the Federal Communications Commission (FCC) and is available through local telephone companies like Zipty Fiber. Through this Lifeline supported offering, local voice and data service is available to qualified individuals with a discount of up to \$34.25 per month. In addition, under the Tribal Link Up program, a qualified resident receives a 100 percent reduction, up to \$100, of the customary installation charges at the customer's principal place of residence.

Only eligible consumers may enroll in the program. Currently to qualify for Tribal Lifeline benefits, an individual must be a resident of a federally recognized tribal land and show proof that you participate in certain government assistance programs. The Lifeline program is limited to one discount per household and is nontransferable. Customers are required to certify and agree that no other member of the household is receiving Lifeline service from Zipty Fiber or another communications provider.

Tribal Lifeline and Tribal Link Up are administered through the Universal Service Administrative Company (USAC) for the FCC. More information about these programs can be found on the USAC website at <https://www.lifelinesupport.org/additional-support-for-tribal-lands/> or by calling 1-800-234-9473.

Additionally, each year Zipty Fiber is required to file its annual FCC Form 481 report with USAC by July 1<sup>st</sup>. This form collects financial and operational information used to validate funding from the federal Universal Service Fund High Cost program. Tribal governments can now access this information via USAC's online 54.314 Certification Filing System.

In order to obtain access to the 54.314 system, please contact the High Cost Division at [form481@usac.org](mailto:form481@usac.org) to request an authorization form. Once granted access, you will be able to log into the 54.314 system and view Form 481 data filed by Ziplly Fiber and other carriers that serve your Tribal lands.

Please reach out to us at any time if you want to schedule a meeting by contacting me at 503-431-0458 or by email at [Jessica.Epley@ziply.com](mailto:Jessica.Epley@ziply.com). We look forward to a meaningful, on-going dialogue with your Tribal leaders and community.

Sincerely,

A handwritten signature in black ink, appearing to read 'JEpley', written over a light blue horizontal line.

Jessica Epley  
Regulatory and External Affairs Director

### **Line 1010 - Voice Services Rate Comparability Compliance**

The price of Ziplly Fiber's fixed voice service for each exchange included within this study area is below the FCC's reasonable comparability benchmark for voice services of \$54.76 based on the results of the 2021 Urban Rate Survey for fixed Voice and Broadband services released by the Wireline Competition Bureau on November 30, 2020 (WC Docket No. 10-90, DA 20-1409).



### **Line 1030 – Broadband Services Rate Comparability Compliance**

The price of Ziplly Fiber's fixed broadband services for each of the broadband services offered within this reported Study Area, as determined by the broadband service's download and upload bandwidths and usage allowance, is below the FCC's reasonable comparability benchmarks for fixed broadband services, based on the supported service's download and upload bandwidths and usage allowance, as reflected in the results of the 2021 Urban Rate Survey for fixed Voice and Broadband Services released by the Wireline Competition Bureau on November 30, 2020 (WC Docket No. 10-90, DA 20-1409).

State	FCC CAI #	anchername
WA	336812	Northwest Indian Colleges
WA	336904	Lummi Nation
WA	336968	Northwest Indian College
WA	337485	LUMMI TRIBAL POLICE DEPARTMENT
WA	338724	SKAGIT RIVER SCHOOL HOUSE
WA	340494	FERRY-OKANOGAN COUNTY FIRE PROTECTION DISTRICT 14 - TORODA
WA	339025	YAKIMA COUNTY FIRE PROTECTION DISTRICT 14 - NILE-CLIFFDELL FIRE
WA	339059	YAKIMA COUNTY FIRE PROTECTION DISTRICT 14 - NILE-CLIFFDELL FIRE
WA	339060	YAKIMA COUNTY FIRE PROTECTION DISTRICT 14 - NILE-CLIFFDELL FIRE
WA	339358	Nile
WA	337489	SKAGIT COUNTY FIRE PROTECTION DISTRICT STATION 6
WA	337532	SKAGIT COUNTY EXTENSION
WA	338215	BAYVIEW ELEMENTARY

address	city	state	zip5	latitude	longitude	SAC
2522 Kwina Road	BELLINGHAM	WA	98226	48.793842	-122.620288	522449
2616 Kwina Road	BELLINGHAM	WA	98226	48.793828	-122.625447	522449
2522 Kwina Rd.	BELLINGHAM	WA	98226	48.793735	-122.620169	522449
2616 KWINA ROAD	BELLINGHAM	WA	98226	48.794126	-122.623401	522449
41382F STATE ROUTE 20	CONCRETE	WA	98237	48.540868	-121.845781	522449
839 KETTLE RIVER ROAD	CURLEW	WA	99118	48.926841	-118.751413	522449
14550 STATE ROUTE 410	NACHES	WA	98937	46.878712	-120.980661	522449
150 OLD RIVER ROAD	NACHES	WA	98937	46.918449	-121.047731	522449
8520 STATE ROUTE 410	NACHES	WA	98937	46.807087	-120.916989	522449
1891 Nile Road	Naches	WA	98937	46.819443	-120.935111	522449
16220 Peterson Rd	Burlington	WA	98233	48.471882	-122.393543	522449
11762 Westar Ln	Burlington	WA	98233	48.476896	-122.408027	522449
15241 Josh Wilson Rd	Burlington	WA	98233	48.486838	-122.416394	522449

WC_CLLI	Site CLLI	kml_name	Project#	Open For Sales
FNDLWAXF	FNDLWAXF	FNDLWAXF	5254345	12/29/2020
FNDLWAXF	FNDLWAXF	FNDLWAXF	5254345	12/29/2020
FNDLWAXF	FNDLWAXF	FNDLWAXF	5254345	12/29/2020
FNDLWAXF	FNDLWAXF	FNDLWAXF	5254345	12/29/2020
HMTNWAXA	HMTNWAXX	HMTNWAXX	5252319	10/6/2020
CRLWWAXA	CRLWWAJC	CRLWWAJC	5239864	1/20/20
NILEWAXX	NILEWAXX_2126	NILEWAXX_212	5245326	12/30/2020
NILEWAXX	NILEWAAA	NILEWAAA	5255325	12/30/2020
NILEWAXX	NILEWAXX_1707	NILEWAXX_170	5251800	12/31/2020
NILEWAXX	NILEWAXX_163	NILEWAXX_163	5251804	12/31/2020
BURLWAXX	BURLWABA	BURLWAXX	5257841	7/23/2020
BURLWAXX	BURLWABA	BURLWAXX	5257841	7/23/2020
BURLWAXX	BURLWABA	BURLWAXX	5257841	7/23/2020