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Sent via WUTC Electronic Filing Portal

Mr. Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: WUTC Docket UT-240183 - Ziplly Wireless Substantive Plan of Investments

Dear Director Killip:

As stated in Ziplly Wireless, LLC dba Ziplly Fiber's Petition for Designation as an Eligible Telecommunications Carrier and pursuant to WAC 480-123-030, Ziplly Wireless submits its substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers.

Ziplly Wireless has been assigned the FCC's Connect America Fund II Auction award ("CAF II Auction") of \$684,709.24 annually over ten years to construct broadband access at speeds of 25/3Mbps to 1,910 locations (<https://docs.fcc.gov/public/attachments/DA-18-887A1.pdf>) in Washington from Computer 5, Inc dba LocalTel Communications ("LocalTel") in FCC Wireline Competition Bureau Docket No. 24-87. (<https://www.fcc.gov/ecfs/search/search-filings/filing/109132734917562>).

At consummation of the transaction, LocalTel had certified completion of 1,171 locations exceeding the required deployment obligations for program year 2023. Ziplly Wireless has subsequently reported to the FCC an additional 383 locations as construction complete meeting the 80% milestone required for 2024. In the final year of CAF II Auction program (2025), Ziplly Wireless intends continue LocalTel's plan detailed in the *Amended Petition for ETC Designation*

on behalf of Computer 5, Inc., d/b/a LocalTel filed December 19, 2018 in Washington Utilities and Transportation Commission Docket UT-180763:

II. LOCALTEL'S PROPOSED PARTICIPATION IN THE FCC'S CONNECT AMERICA FUND PHASE II AUCTION

C. Details of LocalTel's Planned Broadband and Voice Deployment and Services

The services that LocalTel proposed in its winning bid consisted of (1) a fixed wireless network to provide consumers with a baseline of 25 MB Broadband Internet Access, with options for commercial class services in the 300MB-500MB range, and (2) provision of Carrier Grade TDM and VoIP voice services over the public switched telephone network (PSTN), connected to LocalTel's Class 5 switch with local 911 connections throughout its network footprint, which currently includes Douglas, Chelan, and Grant counties, and will expand to allow LocalTel to serve the Census Block Groups identified in Exhibit A.

LocalTel's proposed deployment will provide fixed wireless 5 GHz 802.11ac connections at consumer locations to 5 GHz access points on towers across the service area. The wireless customer connections can provide a maximum speed of 100 MB. The access points will connect to Ethernet switches connected to high-speed, 5 GHz, 11 GHz, 18 GHz and 24 GHz radios that will backhaul the traffic at up to 1GB speeds to the LocalTel data center and network operations center (NOC), with traffic going from there to the Internet using 10 GB fiber virtual local area networks (VLANs) to LocalTel's peered connections and upstream Tier 1 Internet providers. For broadband services, each customer's radio wireless WAN port will be configured with a public, static IPV4 address. These radios with routers will route to the Internet across LocalTel's fixed wireless network back to the NOC, where LocalTel will route them to the Internet through its multiple upstream Internet feeds utilizing Border Gateway Protocol (BGP). The advanced technologies that LocalTel will deploy, including high-speed backhaul and connections to the broader Internet, will facilitate the provision to LocalTel customers of high-speed, low-latency connections with high usage allowances (over 150 GB's per month per household). The deployment of these technologies will meet all the service requirements established by the FCC in connection with the CAF II Auction.

With respect to voice services, LocalTel will provide Carrier Grade TDM and VoIP circuit-switched voice services from its Class 5 switch, which is connected to the PSTN, local 911 centers, multiple public service answering points (PSAPs), multiple incumbent local exchange carriers (ILECs) and provides all carrier-class features. LocalTel will utilize the

G711 Codec, which provides a full 64k bandwidth for voice and fax services. The technologies that LocalTel will utilize will allow for average latency to the home under 20ms, with enough bandwidth and low enough latency to achieve a 4.0 MOS score, providing customers with high quality voice service.

As of the date of this filing, Ziplly Wireless is using both owned fixed wireless infrastructure as well as leased fiber operated by Chelan, Douglas and Grant counties public utilities districts to meet this obligation. LocalTel has upgraded their backhaul up to 10GB transport availability where required. To meet the final 20% buildout milestone, we are deploying additional fixed wireless equipment to reach all remaining broadband serviceable locations that are within the obligated census blocks.

Please feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'JEpley', with a stylized flourish at the end.

Jessica Epley
VP - Regulatory & External Affairs