

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	DOCKET No. UT-240739
APPLICATION OF ZIPLY FIBER PACIFIC, LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER (LOW INCOME ONLY)	Amended Petition of Ziplly Fiber Pacific, LLC for Designation as an Eligible Telecommunications Carrier

ZiPLY Fiber Pacific, LLC, DBA ZiPLY Fiber ("ZFP" or the "Company"), pursuant to the Federal Communications Act of 1934, as amended (the "1996 Act"), 47 U.S.C. § 214(e), Federal Communications Commission ("FCC") rules related to Universal Service, 47 C.F.R. §§ 54.101 through 54.207 (the "FCC Rules"), and Washington Administrative Code ("WAC") 480-123-030, hereby requests that the Washington Utilities and Transportation Commission ("WUTC" or "Commission") designate ZFP as an Eligible Telecommunications Carrier ("ETC") in the State of Washington in order to receive federal universal service support for Lifeline services in the state of Washington.

ZFP respectfully requests that the Commission grant this Application and that it do so expeditiously so ZFP may begin providing Lifeline service at the earliest practicable time.

**INFORMATION REGARDING THE APPLICATION**

1. ZFP is a Delaware limited liability company authorized to do business in Washington with its principal offices located at 135 Lake Street South, Suite 155, Kirkland, WA 98033. ZFP is a Competitive Telecommunications Company registered with the Commission in Docket UT-220087.

2. ZFP is an affiliate of ZiPLY Fiber Northwest, LLC which also has ETC designation in Washington.

3. Correspondence or communications pertaining to this Application or questions concerning the ongoing operations of ZFP should be directed to:

Jessica Epley

ZiPLY Fiber  
135 Lake Street South  
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## **BACKGROUND**

4. The FCC has adopted a number of cost recovery policies and mechanisms designed to promote and maintain universal service. One aspect of universal service is the availability of subsidies from the federal Universal Service Fund ("USF"), created by the Act. The USF was created, in part, to provide support to qualifying low-income communications end-users. Mechanisms were also established to moderate the amount of costs to be recovered through basic, recurring charges to low-income users, thereby assisting efforts to maintain reasonable basic rate levels for those users. Only carriers designated as an ETC may receive subsidies from the USF. Moreover, only a "common carrier" designated as an ETC under 47 U.S.C § 214(e) is eligible to receive subsidies from the federal USF. Common carriers that provide services consistent with the requirements of Section 214(e) may be deemed ETCs. Section 214(e)(2) of the Act provides that:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier and an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

Section 214(e)(1) of the Act provides:

A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with Section 254 of this title and shall, throughout the service area for which the designation is received -

(A) offer the services that are supported by Federal universal service support mechanisms under Section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution.

5. The FCC has promulgated rules governing ETC designations to establish various requirements for carriers to obtain ETC status. Applications seeking ETC status in Washington must address and satisfy each of the ETC designation criteria under the FCC Rules and comply with the requirements set forth in WAC 480-123-030 for a petition for designation as an ETC.

6. Pursuant to 47 U.S.C. § 214(e)(2), the Commission has the statutory authority to designate a common carrier as an ETC that offers the services supported by the federal Universal Service Fund support mechanisms and advertises "the availability of such services and the charges therefore using media of general distribution."<sup>1</sup>

7. ZFP is a common carrier with a fully constructed fiber-optic network over which it currently offers a full suite of communications services to customers in Washington. Upon designation as an ETC, ZFP is well positioned to seamlessly offer the voice and broadband services and functionalities detailed in Section 54.101(a) of the FCC Rules throughout its Service Area, defined below. Additionally, ZFP will advertise the availability of such services and the charges for these services through its website and media of general distribution and commits to continue to advertise the availability of its Lifeline programs.

8. As shown herein, ZFP also meets the additional requirements set forth in the FCC Rules for obtaining ETC designation for purposes of receiving Lifeline funding support because it can:<sup>2</sup>

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<sup>1</sup> 47 C.F.R. § 54.201(d)(2).

<sup>2</sup> 47 C.F.R. § 54.202.

(a) Certify ZFP's compliance with the service requirements applicable to the support that it receives;

(b) Demonstrate ZFP's ability to remain functional in emergency situations, including a demonstration of possession of reasonable amount of back-up power to ensure functionality without an external power source, and ability to reroute traffic around damaged facilities, and capability of managing traffic spikes resulting from emergency situations;

(c) Demonstrate that ZFP satisfies the applicable consumer protection and service quality standards;

(d) Demonstrate ZFP's financial and technical capability of providing Lifeline service in compliance with the FCC's rules and regulations;<sup>3</sup>

(e) Submit information describing the terms and conditions of any service plans offered to Lifeline subscribers, and

(f) Demonstrate that ETC designation is in the public interest.

9. Designation of ZFP as an ETC is in the public interest of the State of Washington and its low-income telecommunications end-users. Upon designation as an ETC, ZFP will make Lifeline service available to qualifying customers in the Service Area pursuant to the guidelines and requirements of the universal service program and 47 C.F.R. § 54.202.

### **ZFP MEETS THE REQUIREMENTS FOR DESIGNATION AS AN ETC IN WASHINGTON**

10. As demonstrated below, ZFP meets the requirements for ETC designation by the Commission pursuant to Section 214(e)(2) of the Act,<sup>3</sup> consistent with the requirements of WAC 480-123-030. In addition, ZFP complies with the standards established by the FCC for determining whether applicants for ETC status serve the public interest.<sup>4</sup> The requested

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<sup>3</sup> 47 U.S.C. § 214(e)(2)

<sup>4</sup> See Federal-State Joint Board on Universal Service, *Report and Order*, CC Docket No. 96-45, 20 FCC Red 6371, 40-43 (Rel. March 17, 2005).

designation of ZFP will provide better service and increased consumer choice in the designated area.

11. The Commission has jurisdiction to designate ZFP as an ETC. Pursuant to the provisions of Section 214(e)(2) of the Act, state commissions, such as this Commission, have primary responsibility for the designation of eligible telecommunications carriers under Section 214(e)(2). As shown in this Application, ZFP meets the requirements for designation as an ETC in Washington. The Commission should grant ZFP's application for ETC status expeditiously.

12. ZFP's affiliate company, Zply Fiber Northwest, generates substantial revenues from non-Lifeline and wholesale services derived from its network subscribers. ZFP and Zply Fiber Northwest are both operating companies of Northwest Fiber, LLC and have access to capital and resources required to comply with duties as an ETC. Consequently, ZPF will not rely exclusively on Lifeline reimbursement for operating revenues.

13. The same individuals who operate Zply Fiber Northwest will operate ZFP. Attached as Exhibit 1 is a current list of the Company's officers, along with relevant biographical information. Thus, ZFP has the same level of technical expertise and experience in running Lifeline programs as does Zply Fiber Northwest, an existing ETC in Washington. ZFP will follow the same procedures for operating Lifeline as does Zply Fiber Northwest. The National Verifier, operated by the Universal Service Administrative Company (USAC), will be used to determine subscribers' eligibility to receive the Lifeline benefit thus reducing the chance of fraud or error.

14. WAC 480-123-030(1)(a) Description.<sup>5</sup> The Commission has granted ZFP the authority to provide service throughout the state of Washington.<sup>6</sup> Currently, ZPF provides a wide suite of communications products and services, including voice and broadband, over its network exclusively constructed using fiber-optic facilities to customers throughout Washington state.

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<sup>5</sup> WAC 480-123-030(1)(a) ("Petitions for designation as an ETC must contain ...[a] description of the area or areas for which designation is sought").

<sup>6</sup> See Commission Docket UT-220087, letter from Amanda Maxwell to Steve Weed, March 2, 2022.

ZFP's business plan is intentionally calibrated to allow it to continually analyze growth opportunities throughout the state. ZFP seeks to be designated as an ETC throughout the area defined by its physical network footprint in Washington, as that footprint expands from time to time (e.g., as a result of buildout or acquisition of physical plant).<sup>7</sup> WAC 480-123-030(1)(a) requires applicants to provide a description of their "service area" for which designation is sought. WAC 480-123-120 defines "service area" as "designated exchanges served by the company". WAC 480-120-021 defines exchange as "geographic area established by the company". As a competitive carrier, ZFP defines its exchanges as a collection of geographic points reached by our network aggregated as an area as shown on the map in Exhibit 2 and depicted as a list of cities and individual geographic points in Exhibit 3. The geographic composition of a service area for designation of a competitive ETC has no impact on the way in which support is received and thus this definition of exchange is consistent with rule and is in the public interest. ZFP will offer supported services to any potential customer in its active service area.

15. WAC 480-123-030(1)(b) Statement.<sup>8</sup> ZFP will offer all required supported services and functionalities in its service area described above. Section 214(e)(l)(A) of the Act<sup>9</sup> requires an ETC to offer the services that are supported by federal universal service support mechanisms under Section 254(c). Effective December 29, 2011, pursuant to the USF/ICC Transformation Order<sup>10</sup> as further clarified by the USF/ICC Order on Reconsideration, the FCC eliminated its

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<sup>7</sup> As ZFP expands its network footprint, it will file to correspondingly extend the geographic scope of its Lifeline ETC designation, and will provide with such filings a narrative description of the deployed infrastructure, as well as geographic information showing the area to which the Lifeline ETC designation should be extended.

<sup>8</sup> WAC 480-123-030(1)(b) ("Petitions for designation as an ETC must contain ...[a] statement that the carrier will offer the services supported by federal universal service support mechanisms throughout the area for which it seeks designation, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another ETC)").

<sup>9</sup> 47 U.S.C. § 214(e)(l).

<sup>10</sup> Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform—Mobility Fund, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) ("USF/ICC Transformation Order").

former list of nine supported services and amended Section 54.101(a) of its rules to specify that "voice telephony service" is supported by the federal universal service mechanisms. The amended Section 54.101(a) and its list of supported services reads as follows:

§54.101 Supported services for rural, insular and high cost areas.

(a) *Services designated for support.* Voice telephony services and broadband service shall be supported by federal universal service support mechanisms.

(1) Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.

(2) Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.

(b) An eligible telecommunications carrier eligible to receive high-cost support must offer voice telephony service as set forth in paragraph (a)(1) of this section in order to receive federal universal service support.

(c) An eligible telecommunications carrier (ETC) subject to a high-cost public interest obligation to offer broadband Internet access services and not receiving Phase I frozen high-cost support must offer broadband services as set forth in paragraph (a)(2) of this section within the areas where it receives high-cost support consistent with the obligations set forth in this part and subparts D, K, Land M of this part.

(d) Any ETC must comply with subpart E of this part.

16. Upon designation as an ETC in Washington, and consistent with state and federal policies favoring universal service, ZFP will offer voice telephony services as described in the amended Section 54.101 of the FCC Rules.<sup>11</sup> The service will provide voice grade access to the public switch network or its functional equivalent and minutes of use for local service at no

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<sup>11</sup> 47 C.F.R. § 54.101(a).

additional charge to end users. ZFP will provide voice over internet protocol (VoIP) and broadband services either bundled together or as individual products. Exhibit 4 contains a general list of products typically offered by ZFP. Details regarding ZFP's offerings for a specific location can be found at <https://get.ziplyfiber.com/internet>. All products offered by ZFP are eligible to receive the Lifeline subsidy.

17. The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and enhanced 911 ("E911") to the extent local governments in an eligible carrier's service area have implemented 911 or E911 systems.

18. ZFP will provide the above services through its own facilities, whether owned or leased pursuant to an Indefeasible Right of Use (IRU) or wholesale arrangement. Under Section 214(e)(1)(A) of the Act and consistent with WAC 480-123-030(1)(b), an ETC must offer the services supported by federal universal service support mechanisms throughout its designated service area "either using its own facilities or a combination of its own facilities and resale of another carrier's services."<sup>12</sup> ZFP also certifies that, in accordance with 47 U.S.C. § 254(e), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

19. WAC 480-123-030(1)(c) Description.<sup>13</sup> ZFP will provide the supported services set forth above through ZFP owned and operated fiber-optic infrastructure XGS-PON (10 Gigabit Symmetrical Passive Optical Network) equipment representing the latest in telecommunications technology. In addition, ZFP provides voice service through two carrier grade Class 5 integrated soft switches capable of delivering supported services in a single site deployment for up to 100,000 subscribers operated by its affiliate, Ziply Fiber Northwest. These switches are rated to

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<sup>12</sup> 47 U.S.C. § 214(c)(1)(a).

<sup>13</sup> WAC 480-123-030(1)(c) ("Petitions for designation as an ETC must contain ...[a] description of how it will provide each supported service").



provide 99.999% uptime delivering reliability and redundancy which will ensure high quality service to the company's customers. These switches also allow for easy repairs and upgrades.

20. WAC 480-123-030(1)(d) Two-Year Plan.<sup>14</sup> WAC 480-123-030(1)(d) requires petitions for ETC designation to include a substantive plan of the investments to be made with initial federal support during the first two years in which support is received. This requirement applies to carriers that seek high-cost support to fund investments to their networks. ZPF is requesting ETC designation in Washington solely for the purpose of participating in the Lifeline program as a Lifeline provider. It is not seeking designation for the purpose of participating in the USF's high-cost program. Based on the foregoing, ZPF has no basis for filing an investment plan and should be exempt from WAC 480-123-030(1)(d).

21. WAC 480-123-030(1)(e) Statement.<sup>15</sup> ZFP will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service (47 C.F.R. § 54.405(b)). ZFP will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)), namely through a combination of media, such as advertising via television, radio, newspapers, magazines or other print advertisements, outdoor advertising, direct marketing, the Company website, and/or the Internet.

### **ADDITIONAL ELIGIBILITY CRITERIA**

22. 47 C.F.R. § 54.202 imposes a number of requirements in order to be designated an ETC under Section 214(e)(6). ZFP will comply with the requirements of 47 C.F.R. § 54.202, many of which overlap with those of WAC 480-123-030.

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<sup>14</sup> WAC 480-123-030(1)(d) ("Petitions for designation as an ETC must contain ...[a] 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").

<sup>15</sup> WAC 480-123-030(1)(e) ("Petitions for designation as an ETC must contain ...[a] statement that the carrier will advertise the availability of services supported by federal universal service mechanisms, including advertisement of applicable telephone assistance programs, such as Lifeline, that is reasonably calculated to reach low-income consumers not receiving discounts").

23. WAC 480-123-030(1)(g) Information.<sup>16</sup> Under the FCC Rules, and in compliance with WAC 480-123-030(1)(g), an ETC applicant must demonstrate its ability to remain functional in emergency situations.<sup>17</sup> ZFP certifies that it maintains adequate backup power to meet state and federal standards. ZFP also engages in preventative maintenance to keep its infrastructure in safe working order. To guard against service interruptions, such as those caused by natural or man-made events, ZFP has designed its network so that its critical systems and service locations use diverse fiber routes which have failover capabilities, ensuring its network and services remain available to customers.

24. ZFP's internal standard for backup power is a minimum of 48 hours of critical power system supply for central offices and remote terminals with onsite generators. All of our central office locations host onsite generators with either underground fuel tanks or above ground concrete encased fuel tanks. The standard fuel capacity across our footprint is five days. In remote terminal locations where we do not have a generator onsite, we have strategically staged generators on trailers that can be deployed in under four hours.

25. WAC 480-1123-030(1)(h) Information.<sup>18</sup> To satisfy both the FCC's rules and demonstrate that ZFP will comply with the applicable consumer protection and service quality standards of WAC 180-120, ZFP certifies, as required by 47 C.F.R. § 202(a)(l)(i), that it will comply with the service requirements applicable due to its designation as an ETC for purposes of receiving Lifeline support. ZFP not only commits to provide service throughout its Service Area, but also commits to provide universal service in a timely manner to all customers in the Service

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<sup>16</sup> WAC 480-123-030(1)(g) ("Petitions for designation as an ETC must contain ...[i]nformation that demonstrates its ability to remain functional in emergency situations including a description of how it complies with WAC 480-120-411").

<sup>17</sup> 47 C.F.R. § 54.202(a)(2).

<sup>18</sup> WAC 480-123-030(1)(h) ("Petitions for designation as an ETC must contain ...[i]nformation that demonstrates that it will comply with the applicable consumer protection and service quality standards of chapter 480-120 WAC").

Area who make a reasonable request for service pursuant to the FCC Rules.<sup>19</sup> If designated as an ETC, ZFP will provide service throughout its Service Area through its own facilities, Indefeasible Right of Use (IRU) facilities, or other wholesale arrangements.

26. ZFP will comply with the consumer protection standards set by the FCC, including:

(a) Customer Proprietary Network Information- ZFP will satisfy all consumer privacy protection standards as provided in 47 C.F.R. § 64, Subpart U as applicable and will protect Customer Proprietary Network Information ("CPNI") as required by state and federal law and will certify compliance with the same on an annual basis.

(b) General Compliance – ZFP commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's USF Order.<sup>20</sup> ZFP in general commits to satisfying all applicable state and federal requirements related to consumer protection and service quality standards, consistent with its history in providing service to Washington customers.

27. FCC Factors. In addition to satisfying the requirements set in the federal standards and state rules, ETC designation would be consistent with the factors identified by the FCC that are to be considered in determining whether designation of additional ETCs will serve the public interest and whether the benefits of an additional ETC would outweigh potential harms. These factors include: 1) the benefits of increased competitive choice; and 2) the unique advantages of the applicant company's service offerings.<sup>21</sup> ZFP affirms that its requesting ETC designation meets these criteria as described below.

28. The FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of

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<sup>19</sup> 47 C.F.R. § 54.202(a)(l) also requires the submission of a five-year plan demonstrating how high-cost universal service support will be used to improve the ETC's coverage, service quality and capacity. This requirement, however, is inapplicable to this application, since ZFP is not seeking high-cost assistance.

<sup>20</sup> Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Red 8776 at 4 (1997) ("USF Order").

<sup>21</sup> 47 U.S.C. § 54.202(c).

telecommunications services they provide.<sup>22</sup>

29. Designation of ZFP as an ETC creates competitive pressure for other wireline and wireless providers within the proposed service area. In order to remain competitive in low-income markets, therefore, all carriers will have greater incentives to improve networks, increase service offerings and lower prices. This results in improved customer services and, consistent with federal law, benefits consumers by allowing ZFP to offer the services designated for support at rates that are "just, reasonable, and affordable."<sup>23</sup>

30. ZFP will offer local voice telephony service and broadband service. Details of ZFP's offerings can be found at <https://get.ziplyfiber.com/internet>.

31. ZFP will announce and advertise telecommunications services as an ETC in its Service Area and will publicize the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Washington residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to ZFP's service.

32. ZFP will provide Lifeline services as an ETC in all of its physical service area as described in paragraph 14 above.

33. ZFP reiterates that it is applying for ETC designation solely for the purpose of providing Lifeline discounts to qualified low-income consumers and to seek reimbursement for the same and will not seek or accept high-cost support at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunication or broadband services for the eligible consumer, it is distributed on a per-customer basis, and is directly reflected in the price that the eligible customer pays. As a result, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to

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<sup>22</sup> See *e.g.* Specialized Common Carrier Services, 29 FCC2d 870 (1971).

<sup>23</sup> 47 U.S.C § 254(b)(1).

low-income users, which is clearly in the public interest. In addition, designation of ZFP as an ETC will not pose any adverse effect in the growth in the high-cost portions of the USF, nor will it create or contribute to an erosion of high-cost funding from any rural or non-rural telephone company.

34. Designation of ZFP as an ETC benefits the public interest by supporting low-income consumers throughout ZFP's Service Area. Approval of ZFP's ETC Application will serve the public interest by increasing participation of qualified consumers in the Lifeline program in the State of Washington. It will also increase the number of carriers eligible for federal USF support, thereby proportionately increasing the amount of federal USF dollars available to Washington consumers. Granting ETC status to ZFP will contribute to more Washington residents receiving Lifeline, thereby increasing the amount of federal USF dollars flowing into the state and thereby benefiting Washington residents. In short, Washington residents will have an expanded opportunity to get more of their money back.

**ZFP WILL COMPLY WITH ALL ANNUAL REPORTING REQUIREMENTS**

35. Consistent with the requirements of 47 C.F.R § 54.422, ZFP will comply with the FCC's annual reporting requirements:

(a) As required by 47 C.F.R. §54.422(b)(1), Zply Fiber will report, on an annual basis, "any outage in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration" that potentially affects 1) at least ten percent of the end users served in a designated service area; or 2) a 911 special facility. The report will include 1) the date and time of the onset of the outage; 2) a brief description of the outage and its resolution; 3) the particular services affected; 4) the geographic areas affected; 5) the steps taken to prevent a similar situation in the future; and 6) the number of customers affected.

(b) Consistent with the requirements of 47 C.F.R. § 54.422(b)(2), ZFP will annually report the number of complaints received by ZFP from the FCC, this Commission, or the Better Business Bureau, per 1,000 connections.

(c) As required by 47 C.F.R. § 54.422(b)(3), ZFP will certify its continuing compliance with all applicable service quality standards and consumer protection rules.

(d) Consistent with the requirement of 47 C.F.R. § 54.422(b)(4), ZFP will certify, on an annual basis, its continued ability to remain functional in emergency situations.

### **CONCLUSION**

Having demonstrated that ZFP satisfies the conditions necessary for designation as an ETC in Washington and having shown that the public and universal service interests of the telecommunications consumers of Washington will be properly served, ZFP respectfully requests that the Commission designate Zply Fiber Pacific, LLC as an ETC for the provision of Lifeline support in the state of Washington.

RESPECTFULLY SUBMITTED this 31st day of October, 2024

ZiPLY Fiber Pacific, LLC d/b/a ZiPLY  
Fiber

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Name of Party



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Signature on Behalf of Party

Jessica Epley

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Name of Signer

VP – Regulatory & External Affairs

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Title of Signer

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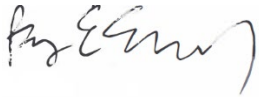
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Designated Email for Party

**CERTIFICATION**

I declare under penalty of perjury under the law of Washington that the foregoing is true and correct.

Signed on October 2, 2024 at Kirkland, WA.

A handwritten signature in black ink, appearing to read "Byron E. Springer, Jr.", written in a cursive style.

Byron E. Springer, Jr.

General Counsel