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

Re: ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber - Eligible Telecommunications Carriers' Annual Recertification on High Cost Fund Pursuant to WAC 480-123-060, 070 and 080

Dear Director Killip:

Enclosed for filing is ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber's ("ZiPLY Fiber") 2024 ETC Annual Recertification on High Cost Fund pursuant to WAC 480-123-060, 070 and 080. The Company considers financial information submitted with this filing confidential and protected under the provisions of WAC 480-07-160. These items are marked "Confidential per WAC 480-07-160". The Company, for commercial reasons, may be harmed if this information is not treated by the Commission as confidential. A confidential and redacted copy of the filing is enclosed.

Pursuant to WAC 480-123-060, ZiPLY Fiber provides a certification that it will use all federal high cost support received for the provision, maintenance, and upgrading of facilities and services for which the support is intended. With this filing, ZiPLY Fiber requests the Washington Utilities and Transportation Commission provide appropriate certification to the Federal Communications Commission ("FCC") of ZiPLY Fiber's use of federal high cost support in accordance with applicable federal law.

If you have any questions concerning this report, please contact me at (503) 431-0458.

Sincerely,

A handwritten signature in black ink, appearing to read "JEpley".

Jessica Epley
VP - Regulatory & External Affairs

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-060; 480-123-070 AND 480-123-080**

ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber ("ZiPLY Fiber") submits the following reports in accordance with WAC's 480-123-060, 480-123-070 and 480-123-080.

WAC 480-123-070(1) – Report on Use of Federal Funds and Benefits to Customers:

(a) The report must provide a substantive description of investments made and expenses paid with support from the federal high-cost fund. The report must include the company's gross capital expenditures and operating expenses made with federal high-cost support received by the ETC in the preceding calendar year along with a description of major projects and affected exchanges. A rate of return wireline ETC must also include a copy of its NECA-1 report for the preceding calendar year.

ANSWER:

- In 2023, ZiPLY Fiber received [REDACTED] in Rural Digital Opportunity Fund support. These funds, along with other revenues, enabled the Company to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. Examples of the investments made and expenses incurred by the Company in 2023 are:

[REDACTED]

In 2023, ZiPLY Fiber used [REDACTED] of the RDOF award for build preparation and materials purchase. The remainder of the 2023 award will be used in the coming years to complete the identified build locations. The following exchanges were impacted in 2023:

- Arlington
- Bellevue
- Darrington
- Deming
- Duvall
- Everett
- Gold Bar
- Hamilton
- Kirkland
- Maple Falls
- Marblemount
- Monroe
- Redmond
- Rockport
- Sedro Wooley
- Stanwood

- Woodinville
- Woodland

WAC 480-123-070(1)(b) – Report on Use of Federal Funds and Benefits to Customers:

(b) Please provide how the consumers benefited from the investments and expenses made with support in 2023.

ANSWER:

ZiPLY Fiber investments and expenses paid with federal high-cost fund support benefitted consumers in the following ways: These federal high cost funds were used to extend high speed broadband or voice services to consumers eligible for ACP and/or Lifeline services. In addition, federal high cost funds were used to assist with designing and extending high speed broadband services to unserved and underserved consumers in largely rural areas throughout Washington.

WAC 480-123-070(2) - Local service outage report.

(a) The report must include detailed information on any outage in the service area (during the prior calendar year) of at least thirty minutes in duration in which the ETC owns, operates, leases, or otherwise utilizes facilities, that potentially affect:

- (i) At least ten percent of the end users; or
- (ii) A 911 special facility, as defined in 47 C.F.R. Sec. 4.5(e).

(b) Specifically, the eligible telecommunications carrier's annual report must include information detailing:

- (i) The date and time of onset and duration of the outage;
- (ii) A brief description of the outage and its resolution;
- (iii) The particular services affected;
- (iv) The geographic areas affected by the outage;
- (v) Steps taken to prevent a similar situation in the future; and
- (vi) The number of customers affected.

ANSWER:

ZiPLY Fiber did not have any outages in 2023 of at least thirty minutes in duration or affecting at least ten percent (10%) of end users or a 911 special facility.

WAC 480-123-070(3) – Report on failure to provide service.

The report must include the number of requests for service from potential customers within its designated service area that were unfulfilled during the prior calendar year. The ETC must also detail how it attempted to provide service to those potential customers.

ANSWER:

In 2023 Ziplly Fiber did not have any unfulfilled service orders.

WAC 480-123-070(4) – Report on complaints per one thousand connections (fixed or mobile).

The report must provide separate totals for the number of complaints that the ETC's customers made to the Federal Communications Commission and the consumer protection division of the office of the attorney general of Washington. The ETC must also report the number of consumer complaints in each general category (for example, billing disputes, service quality).

ANSWER:

Ziplay Fiber reports that it is aware of [REDACTED] complaints made during 2023 to the Federal Communications Commission ("FCC") and [REDACTED] complaints made to the Washington Attorney General ("Washington AG"). This corresponds to a number of complaints per 1,000 lines of approximately [REDACTED]

See Attachment A below for a summary of complaints.

WAC 480-123-070(5) – Certification of compliance with applicable service quality standards and consumer protection rules.

Certify that it met substantially the applicable service quality standards and consumer protection rules found in WAC 480-123-030 (1)(h).

ANSWER:

See attached certification from Byron E. Springer, Jr, Ziplay Fiber General Counsel.

WAC 480-123-070(6) – Certification of ability to function in emergency situations.

Certify that it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

ANSWER:

See attached certification from Byron E. Springer, Jr, Ziplay Fiber General Counsel.

WAC 480-123-070(7) – Advertising certification, including advertisement on Indian reservations.

Certify it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service area.

ANSWER:

See attached certification from Byron E. Springer, Jr, Ziplly Fiber General Counsel.

WAC 480-123-080 – Annual Plan for Universal Service Support Expenditures.

(1) Not later than July 1st of each year, every ETC that receives federal support from any category in the federal high-cost fund must report the planned use of federal support related to Washington state that will be received during the coming calendar year. The report must include the company's planned gross capital expenditures and operating expenses made with federal high-cost support received by the ETC for the coming calendar year along with a description of major projects and affected exchanges.

(2) The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.

ANSWER:

For 2025, Ziplly Fiber will use any federal high-cost support and other revenues to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. The nature and magnitude of its investments and expenditures are anticipated to be similar to those for the prior period. The investments and expenditures to be made with federal support are expected to benefit customers generally by helping enable the Company to continue to provide good quality supported services.



In these build areas, the properties are expected to go from underserved and unserved to being able to get at least 1 Gigabit symmetrical services.

ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber

WAC 480-123-070(4) – Attachment A

Complaints - 2023

Complaint Source	Complaint Reason	Total
Attorney General	Billing	■
	Repair Issue	■
	Representative Quality	■
	Collections	■
	General Inquiry about Products/Services	■
	Refund/Deposit Delay	■
	Porting Issues	■
	Payment Processing Issues	■
	Adjustment	■
	Service/Feature Not Available	■
	Lifeline/ACP	■
	Long Distance Issues	■
	Missed Commitment	■
	Service Order/Trouble Ticket Status	■
Attorney General Total		■

Federal Communications Commission	Billing	■
	Repair Issue	■
	Representative Quality	■
	Collections	■
	General Inquiry about Products/Services	■
	Refund/Deposit Delay	■
	Porting Issues	■
	Payment Processing Issues	■
	Adjustment	■
	Service/Feature Not Available	■
	Lifeline/ACP	■
	Long Distance Issues	■
	Missed Commitment	■
Federal Communications Commission Total		■
Grand Total		■

**CERTIFICATION OF ELIGIBLE TELECOMMUNICATIONS CARRIER AS REQUIRED BY
WAC 480-123-060(1), 480-123-070(5), 480-123-070(6), and 480-123-070(7)**

In compliance with Washington Administrative Code (WAC) 480-123-060(1) I certify that all federal high-cost support received by Ziplly Fiber Northwest, LLC dba Ziplly Fiber will be used in 2025 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

In compliance with Washington Administrative Code (WAC) 480-123-070(5), I certify that Ziplly Fiber is in compliance with applicable service quality standards and consumer protection rules.

In compliance with Washington Administrative Code (WAC) 480-123-070(6) I certify that Ziplly Fiber has the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

In compliance with Washington Administrative Code (WAC) 480-123-070(7), I certify that Ziplly Fiber has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity includes newspaper advertisements likely to reach those who are not current customers of Ziplly Fiber within its designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

6/19/2024 Kirkland, WA
(Date and Place)


(Signature)

Byron E. Springer Jr.
(Printed Name)

General Counsel
(Title)