

July 1, 2022

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Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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 Maxwell:

Enclosed for filing is ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber's ("ZiPLY Fiber") 2022 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,



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 2021, ZiPLY Fiber received \$7,924,469 in federal high cost and Connect America 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 2021 are:



ANSWER:

These investments and expenditures generally benefit all customers receiving the federal high cost supported services from the Company within its designated service area.

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:

See included Attachment B for all outage information

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 2021 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:

Zipty Fiber reports that it is aware of [REDACTED] complaints made during 2021 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, Zipty 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, Ziplly 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(1) – 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.

ANSWER:

For 2023, 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. They are expected to benefit customers generally by helping enable the Company to continue to provide good quality supported services.

(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:

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.

ZiPLY Fiber Northwest, LLC dba ZiPLY Fiber

WAC 480-120-070(4) – Attachment A

Complaints - 2021

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	■
	Long Distance Issues	■
	Missed Commitment	■
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	■
	Long Distance Issues	■
	Missed Commitment	■
Federal Communications Commission Total		■
Grand Total		■