

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

Frontier Communications Northwest, LLC dba Ziplly Fiber ("Ziplly 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:

Ziplly Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

(b) Every ETC must provide a substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to (a) of this subsection.

ANSWER:

Ziplly Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

Confidential per WA 480-07-160

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

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 own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

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:

ZiPLY Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

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

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:

ZiPLY Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

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:

ZiPLY Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

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:

ZiPLY Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

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

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:

ZiPLY Fiber did not own or operate this company in 2019 as it was owned by Frontier Communications, Inc. Please see Attachment A.

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 2021, ZiPLY 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.

**CERTIFICATION OF ELIGIBLE TELECOMMUNICATIONS CARRIER AS REQUIRED BY
WAC 480-123-060(1)**

In compliance with Washington Administrative Code (WAC) 480-123-060(1) I certify the following:

- 1) That all federal high-cost support received by Frontier Communications Northwest, LLC dba Ziplly Fiber will be used in 2021 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

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

June 30, 2020 Seattle, WA
(Date and Place)


(Signature)

Byron Springer
(Printed Name)

General Counsel
(Title)

Attachment A

2020 Washington ETC Annual Recertification Supporting Certification

To facilitate Ziplly Fiber's 2020 ETC Annual Recertification on High Cost Fund pursuant to WAC 480-123-060, 070 and 080, Frontier provided the following supporting data and documentation attributable to pre-close time periods. Frontier utilized its past practices and standard systems, and undertook the same business processes as it has in prior years to gather and prepare this data.

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

In 2019, Frontier received \$8,686,464 in federal high cost and Connect America Fund support for the state of Washington. 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. These funds were assigned as follows:

- 1) Property, Plant & Equipment - [REDACTED]
- 2) Plant Specific Expense - [REDACTED]
- 3) Depreciation Expense - [REDACTED]

See Attachment A for a list of major projects and affected exchanges.

These investments and expenditures generally benefitted all customers receiving the federal high cost supported services from Frontier in 2019.

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

There were no known reportable outages in 2019.

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

Frontier had no known unfulfilled orders for 2019.

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

Frontier is aware of 175 complaints made during 2019 to the Federal Communications Commission (“FCC”) and 199 complaints to the Washington Attorney General (“AG”). This corresponds to a number of complaints per 1,000 lines of approximately 0.21.

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

Frontier substantially met the applicable service quality standards and consumer protection rules found in WAC 480-123-030 (1)(h) during 2019.

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

In 2019, Frontier had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

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

Frontier advertised 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 during 2019.

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

Dated this 29th day of June 2020.



Allison M. Ellis
Former Senior Vice President- Regulatory Affairs
Frontier Communications Northwest Inc.

Frontier Communications Northwest Inc.
WAC 480-123-070 (4)
WA - Complaints - 2019

Complaint Source	Complaint Reason	Total
Attorney General	Billing	105
	Repair Issue	37
	Representative Quality	18
	Collections	10
	General Inquiry about Products/Services	8
	Refund/Deposit Delay	6
	Porting Issues	3
	Payment Processing Issues	3
	Adjustment	3
	Service/Feature not Available	3
	Lifeline	1
	Long Distance Issues	1
	Missed Commitment	1
Attorney General Total		199
FCC	Billing	76
	Repair Issue	37
	Service/Feature not Available	14
	General Inquiry about Products/Services	12
	Collections	8
	Adjustment	7
	Representative Quality	5
	Missed Commitment	4
	Porting Issues	3
	Service Order/Trouble Ticket Status	2
	Lifeline	2
	Refund/Deposit Delay	2
	Payment Processing Issues	2
Long Distance Issues	1	
FCC Total		175
Grand Total		374

Frontier Communications Northwest Inc.
WAC 480-123-070 (1) - Attachment A
WA - List of Major Projects - 2019

Top 3 Exchanges	Project Description	Capital \$\$
Everett, Wenatchee, Mount Vernon (Local)	[REDACTED]	[REDACTED]
Bothell, Halls Lake, Everson	[REDACTED]	[REDACTED]
Everett	[REDACTED]	[REDACTED]
Lake Stevens, Redmond, Pullman	[REDACTED]	[REDACTED]
Republic, Tonasket, Marysville	[REDACTED]	[REDACTED]
Everett, Halls Lake, Bothell	[REDACTED]	[REDACTED]
Wenatchee, Bothell, Arlington	[REDACTED]	[REDACTED]
Mount Vernon (Local), Everett, Wenatchee	[REDACTED]	[REDACTED]
Everett, Mount Vernon (Local), Kennewick	[REDACTED]	[REDACTED]
Highlands	[REDACTED]	[REDACTED]
Lake Stevens, Manor Way, Kirkland	[REDACTED]	[REDACTED]
Arlington, Duvall, Lyman	[REDACTED]	[REDACTED]
Juanita, Kirkland, Kennewick Highlands	[REDACTED]	[REDACTED]
Redmond, Halls Lake, Manor Way	[REDACTED]	[REDACTED]
Wenatchee, Deming, Lake Stevens	[REDACTED]	[REDACTED]
	Grand Total	[REDACTED]