

**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.

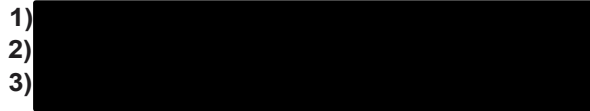
**WAC 480-123-070(1) - Report on Use of Federal Funds and Benefits to Customers:**

(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 during the period of January through April 2020 as it was owned by Frontier Communications , Inc. In 2020, Ziplly Fiber received \$9,086,920 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 2020 are:

- 1)
- 2)
- 3)



**Confidential per WAC 480-07-160** - see Attachment A for a list of major projects and affected exchanges.

(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 during the period of January-April 2020 as it was owned by Frontier Communications , Inc. 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) A911 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 during the period of January-April 2020 as it was owned by Frontier Communications, Inc. See 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:**

ZiPLY Fiber did not own or operate this company during the period of January-April 2020 as it was owned by Frontier Communications, Inc. For the period of May-December 2020, ZiPLY 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:**

ZiPLY Fiber did not own or operate this company during the period of January-April 2020 as it was owned by Frontier Communications, Inc. ZiPLY Fiber reports that it is aware of [REDACTED] complaints made during 2020 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 C 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:**

Zipty Fiber did not own or operate this company during the period of January-April 2020 as it was owned by Frontier Communications, Inc. See attached affidavit 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:**

Zipty Fiber did not own or operate this company during the period of January-April 2020 as it was owned by Frontier Communications, Inc. See attached affidavit from Byron E. Springer, Jr, Zipty 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:**

Zipty Fiber did not own or operate this company during the period of January-April 2020 as it was owned by Frontier Communications , Inc. See attached affidavit from Byron E. Springer, Jr, Zipty 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 2022, Zply 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), 480-123-070(6), and 480-123-070(7)**

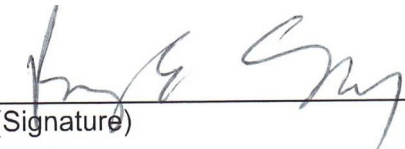
In compliance with Washington Administrative Code (WAC) 480-123-060(1) I certify that all federal high-cost support received by Frontier Communications Northwest, LLC dba Ziplly Fiber will be used in 2022 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

In compliance with Washington Administrative Code (WAC) 480-123-070(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:

Everland, WA      2/29/2021  
Date and Place)

  
Signature)

Byron E. Springer Jr.  
(Printed Name)


General Counsel  
(Title)

**Frontier Communications Northwest, LLC dba Ziplly Fiber**

**WAC 480-123-070(1) -Attachment A**

**List of Major Projects - 2020**

Top 3 Exchanges	Project Description	Capital
Everett, Wenatchee, Mount Vernon (Local)		
Chelan, Entiat, Tonasket		
Bothell, Halls Lake, Custer		
Everett		
Mount Vernon (Local)		
Kennewick Highlands, Wenatchee, Redmond		
Mount Vernon (Local), Everett, Birch Bay		
Everett, Mount Vernon (Local)		
Everett, Bothell, Redmond		
Everett, Bothell, Kirkland		

Lake Stevens, Silver Lake, Kirkland		
Bothell, Kirkland, Silver Lake		
Bothell, Everett, Sammamish		
Juanita, Bothell, Arlington		
Everett, Alger, Curlew		
Halls Lake, Arlington, Kennewick Highlands		
Concrete, Sultan, Darrington		
Everett, Sedro Woolley (Local), Anacortes		
<b>Grand Total</b>		

**Frontier Communications Northwest, LLC dba Ziplly Fiber**

**WAC 480-123-070(2) - Attachment B**

**Outages - 2020**

Date/Time/Duration	Description & Resolution	Services Affected	Location	Future Mitigation	Number of Customers Affected
[Redacted]					

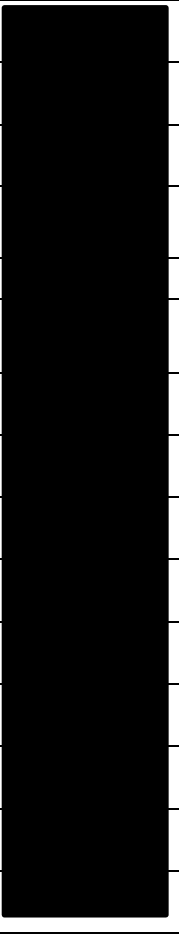


**Frontier Communications Northwest, LLC dba Ziplly Fiber**

**WAC 480-123-070(4) - Attachment C**

**Complaints - 2020**

Complaint Source	Complaint Reason	Total
Attorney General	Billing	[REDACTED]
	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	
<b>Attorney General Total</b>		[REDACTED]

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	
<b>Federal Communications Commission Total</b>		
<b>Grand Total</b>		