

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of Northwest Fiber Holdco, LLC, and BCE Holding Corporation for an Order Approving the Transfer of Control of Ziplly Fiber Northwest, LLC to BCE Holding Corporation.

DOCKET UT-240951

DECLARATION OF BYRON SPRINGER
IN SUPPORT OF MOTION FOR A
PROTECTIVE ORDER FOR HIGHLY
CONFIDENTIAL INFORMATION

I, Byron Springer declare as follows:

1. My name is Byron Springer and I am over 18 years of age.
2. I am the Chief Legal Officer for Northwest Fiber Holdco, LLC (“NWF Holdco”).
3. My business address is 135 Lake Street South, Suite 155, Kirkland, Washington 98033.
4. I have reviewed the foregoing motion for a protective order, and the proposed protective order.
5. I am familiar with the documents for which NWF Holdco is requesting a “Highly Confidential” designation in this docket. Those documents, which will be produced as exhibits to Joint Applicant pre-filed testimony, contain highly sensitive competitive information, highly sensitive competitive information, including: (1) trade secrets and other proprietary, confidential and/or competitively-sensitive documents pertaining to (a) the financing of the Transaction, operational costs, and revenues; (b) technical financial and strategic information concerning NWF Holdco’s plans for investing, upgrading and operating the current Ziplly Network in Washington and the Pacific Northwest following close of the Transaction; and (2) financial statements and other highly-sensitive financial information. Such information should not be available for review, especially by competitors, and NWF Holdco would suffer irreparable harm if such information were released or disseminated more broadly than is required for the resolution of this proceeding.

6. In contrast to the Commission’s standard protective order, the proposed order adequately protects NWF Holdco from such harm by requiring that access to “Highly Confidential” documents by intervenors (including competing carriers) be limited to their outside counsel and consultants.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 22nd day of January, 2025 in Kirkland, Washington.


Byron Springer