

ZiPLY Fiber
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January 15, 2021

Sent via FCC ECFS portal

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

Re: *Connect America Fund, Wireline Competition Bureau Docket No. 10-90*

Dear Secretary:

In 2015, Frontier Communications accepted the Connect America Fund (CAF) Phase II support to deploy broadband service to 40,570 locations across Idaho, Montana, Oregon and Washington. On May 1, 2020 Northwest Fiber, LLC dba ZiPLY Fiber ("ZiPLY Fiber") acquired the companies serving these states as approved by the Federal Communications Commission and the relevant state authorities. As of December 31, 2020, ZiPLY Fiber has deployed newly capable broadband service providing 10/1 Mbps to 39,950 locations in CAF Phase II locations across the four-state region, exceeding the final buildout milestones in Idaho, Montana and Oregon. Based on its initial year-end data, ZiPLY Fiber was able to complete construction of 18,950 locations, or 96.13% of the total, in Washington as of December 31, 2020.

During 2020, ZiPLY Fiber experienced challenges in construction beyond those presented as a result of the transition of the networks. These challenges included delays resulting from the September 2020 wildfires in the region and inability to deploy construction teams due to COVID-19 issues, all compounded by inclement weather at the end of the year. Since the end of the year, however, ZiPLY Fiber has continued progress on the construction of the remaining 763 locations in Washington State. As of the date of this letter, ZiPLY Fiber has added 249 locations to its total and anticipates completion of all construction by February 16, 2021. Thus, in accordance with 47 C.F.R. § 54.320 (d), ZiPLY Fiber provides this notice that it has not met its CAF Phase II one hundred percent interim deployment milestone in Washington. Additionally, ZiPLY Fiber is providing this notice to the Universal Service Administrative Company and to the Washington Utilities and Transportation Commission.

As ZiPLY Fiber has calculated its compliance gap of less than five percent of the interim deployment milestone, the Commission's non-compliance measure found at 47 C.F.R. § 54.320(d) should not be triggered. By March 1 or upon completion, whichever is first, ZiPLY

Fiber will provide the requisite information to the HUBB portal in accord with 47 C.F.R. § 54.316. Questions regarding this filing may be directed to me via email at jessica.epley@ziply.com or telephone at (503) 431-0458.

Sincerely,



Jessica Epley
Regulatory & External Affairs Director

Cc: High-Cost Program - Universal Service Administrative Company
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