

ZiPLY Fiber
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IDAHO PUBLIC
UTILITIES COMMISSION



June 30, 2020

Sent via electronic mail to secretary@puc.idaho.gov

Ms. Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83720

Re: GNR-T-19-01 – 2020 Annual ETC Filing – Citizens Telecommunications Company of Idaho, LLC

Dear Ms. Hanian:

Citizens Telecommunications Company of Idaho, LLC dba ZiPLY Fiber ("Citizens Idaho") hereby files a state affidavit. Citizens Idaho confirms that it successfully filed and certified Program Year 2020 FCC Form 481 and required attachments with USAC on June 16, 2020.

Citizens Idaho requests the Idaho Public Utilities Commission to file the annual certification regarding federal high cost support with the Universal Service Administrative Company (USAC) and the FCC, pursuant to 47 CFR 54.314(a).

Any questions or notifications pertaining to this filing should be directed to me at (503) 431-0458 or by email at jessica.epley@ziPLY.com.

Sincerely,

A handwritten signature in black ink, appearing to read "JEpley".

Jessica Epley
Government & External Affairs Director

State of Washington)
) ss
County of King)

CERTIFICATION BY ELIGIBLE TELECOMMUNICATIONS CARRIER
OF COMPLIANCE WITH SERVICE QUALITY AND CUSTOMER
PROTECTION, ABILITY TO REMAIN FUNCTIONAL IN EMERGENCIES,
AND USE OF FEDERAL HIGH-COST SUPPORT.

AFFIDAVIT OF BUSINESS OR CORPORATE OFFICER

The Idaho Public Utilities Commission Order No. 29841 requires that Eligible Telecommunications Carriers (ETC) certify that it is compliant with applicable service quality standards and consumer protection rules; and ETCs must demonstrate the ability to remain functional in emergencies. In addition, the Commission must file an annual certification with the USAC and the FCC that all federal high-cost support provided to ETCs within the State of Idaho will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. Accordingly, the undersigned states and verifies under oath the following:

1. I am an officer of Frontier Communications Northwest, LLC - Idaho an eligible telecommunications carrier for receiving federal universal service support under section 214(e) of the Telecommunications Act of 1996 in the state of Idaho.
2. I am familiar with the Company's day-to-day operations in the state of Idaho and with the State's service quality standards and consumer protection rules as set forth in Commission Order No. 29841.
3. Frontier Communications Northwest, LLC - Idaho is complying with applicable service quality standards and consumer protection rules of the Federal Communications Commission and the Idaho Public Utilities Commission.
4. I certify to the Commission that the Company is able to remain functional in emergencies as set forth in Commission Order No. 29841 and in 47 C.F.R. § 54.202(a)(2).
5. I also certify that all federal universal service support funds received by Frontier Communications Northwest, LLC - Idaho during the current calendar year will be used in a manner consistent with section 254(e); that is, for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The company will continue to comply for the period of January 1, 2021, through December 31, 2021, to be eligible for federal universal service fund support.
6. This verification and affidavit is provided to be the Idaho Public Utilities Commission to enable the IPUC to certify to the FCC that federal universal service support received by the eligible carriers in the state will be used in a manner consistent with Section 254(e) of the Telecommunications Act.


Name/Title

General Counsel

Date

6/17/2020

SUBSCRIBED AND SWORN to before me this _____ day of _____

Notary Public for _____, residing at _____
My Commission expires _____

NOT
available
due to covid-19

THE IDAHO PUBLIC UTILITIES COMMISSION'S ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) ANNUAL REPORTING REQUIREMENTS

FILING DEADLINES

- **By July 1, 2020:** All ETCs requesting federal high-cost or low-income support from the Universal Service Administrative Company (USAC) must confirm with the Commission that they have filed with USAC and the FCC, FCC Form 481 (47 C.F.R. §§ 54.313 & 54.422) and must file with the IPUC a Signed Affidavit (see note). IPUC Filing methods:

Electronic Filings—Email To:
Diane Hanian, Commission Secretary at
diane.hanian@puc.idaho.gov

Paper Filings (One copy)—Mail To:
Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, Idaho 83720-0074

- **By September 1, 2020:** All other ETCs who do not receive federal high cost funds must notify the Commission upon filing Form 481 and file the affidavit (minus item 5) with the Commission Secretary. This satisfied the PUC annual report requirement for ETCs. *See Order No. 29841.*

Notes:

- *When filing Form 481 with the FCC, clearly reference WC Docket Nos. 10-90 and 11-42 (as appropriate).*
- *The FCC does not require the signed affidavit.*
- **Before October 1, 2020:** The PUC Staff will submit the *Annual Use Certification* Letter (47 C.F.R. § 54.314) to USAC and the FCC on behalf of Idaho ETCs who receive federal high-cost support.

Form 481 Templates and Instructions:

http://www.usac.org/_res/documents/hc/pdf/forms/FCC-Form-481-Instructions.pdf

FOR QUESTIONS RE: THE STATE FILING CONTACT:

Daniel Klein, IPUC Utilities Analyst
208.334.0352 or
daniel.klein@puc.idaho.gov

[If your Company does not receive federal high cost support, omit item 2]