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2023 April 20, 1:39PM  
IDAHO PUBLIC  
UTILITIES COMMISSION



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April 20, 2023

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

Ms. Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd, Bldg 8  
Suite 201-A  
Boise, Idaho 83714

Re: IPUC Case No. VZN-T-23-01, Frederic Quinto vs. Ziplly Fiber Northwest, LLC

Dear Idaho Public Utilities Commission:

Thank you for the opportunity to respond to Mr. Quinto's formal complaint. Ziplly Fiber believes that Mr. Quinto is confused regarding the responsibility of the customer for inside wire facilities on the customer side of the Standard Network Interface (SNI).

Ziplly Fiber has reconfirmed through its local manager, Chris Vickery, that permanent repairs have been made to the pedestal serving Mr. Quinto's residence, and the drop wire to the SNI on the residence is buried, which reduces the likelihood of damage from the elements or human/animal activity. These are permanent facilities improvements paid for by Ziplly Fiber.

Ziplly Fiber submits that there are no temporary facilities on Ziplly Fiber's side of the SNI. Mr. Quinto's service is subject to Ziplly Fiber's price list terms: (<https://wholesale.ziptyfiber.com/-/media/Wholesale/Files/doc/id-price-list-no1-network-access-service-zfn.pdf>) and the Residential Service terms and conditions found at the following link: (<https://ziptyfiber.com/corporate/terms-conditions/resi-services-terms>). The Price List language pinpoints the main issue here: "Installation and Maintenance of CPIW is the responsibility of the customer."

Ziplly Fiber field and central office technicians have tested Mr. Quinto's line to the SNI multiple times over the last several months and have reported clear dialtone to the Company side of the device. Ziplly Fiber has minimal information on the condition of the inside wire on Mr. Quinto's side on the SNI. Mr. Quinto does not subscribe to an inside wire maintenance plan, under which the Company would repair or replace any inside wire components that may be affecting service quality at no cost. Ziplly Fiber technicians strongly suspect that there is recurring damage to Mr. Quinto's inside wire that is affecting service. However, Ziplly Fiber employees or contract technicians will not enter Mr. Quinto's residence until he cures the unsafe working conditions therein.

Based on the facts and arguments set out above, Ziplly Fiber respectfully requests that this formal complaint be dismissed. Ziplly Fiber will continue to respond to Mr. Quinto insofar as any issues with the Company's service to the SNI.

Sincerely,

A handwritten signature in black ink, appearing to read 'JEpley', written over a light blue horizontal line.

Jessica Epley  
VP - Regulatory & External Affairs