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Attorneys for Ziplly Fiber Pacific, LLC

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF UTAH

In the Matter of the Application of ZIPLY FIBER PACIFIC, LLC DBA ZIPLY FIBER for Designation as an Eligible Telecommunications Carrier,	APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER Docket No.
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**APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Ziply Fiber Pacific, LLC (“Applicant,” “Company,” or “Ziply Fiber”), by its undersigned counsel and pursuant to pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), Sections 54.101 of the Rules of the Federal Communications Commission (“FCC”) and section R746-8-100 *et seq.* of the Utah administrative code hereby applies to the Utah Public Service Commission (“Commission”) for Designation as Eligible Telecommunications Carrier (“ETC”) throughout the non-rural areas of Utah for the limited purpose of providing Lifeline services to qualifying customers in Utah, as described herein.

As demonstrated below, Ziply Fiber satisfies all the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, the designation of Ziply Fiber as an ETC will serve the public interest because it would enable Ziply Fiber to provide Lifeline services to low-income Utah residents. For these reasons, Ziply Fiber respectfully requests that the

Commission grant this application.

I. INTRODUCTION/SUMMARY.

Ziply Fiber is a Delaware limited liability company, formed on December 15, 2021. Applicant's principal place of business is Kirkland, Washington. Ziply Fiber is authorized to conduct business as a foreign corporation in the State of Utah. A true and correct copy of Applicant's organizational documents, along with its Utah Foreign Registration Statement are attached hereto as **Exhibit A** and **Exhibit B**, respectively. A description of Ziply Fiber's history, management experience, and financial strength are described in detail in NFC's petition for CPCN (pending and incorporated herein by reference)

Applicant will provide voice telephony and broadband services in the Designated Service Areas either using its own last-mile fiber network facilities and equipment or a combination of its own facilities and the fiber optic facilities and equipment of its affiliate, NFC Northwest, LLC. Ziply Fiber has been operating as a competitive local exchange carrier in Idaho, Montana, Oregon, and Washington for four years.

Applicant's address is listed below:

Ziply Fiber Pacific, LLC
135 Lake Street South, Suite 155
Kirkland, WA 98033

Correspondence or communications pertaining to this Application should be directed to:

Brett N. Anderson
Blackburn & Stoll, LC
257 E. 200 S., Suite 800
Salt Lake City, UT 84111
801-578-3540 (office)
801-513-9587 (mobile)
bretta@blackburn-stoll.com

with a copy to:

Jessica Epley
Zipty Fiber
135 Lake Street South, Suite 155
Kirkland, WA 98033
(503) 431-0458 (mobile)
jessica.epley@zipty.com
legal@zipty.com

Questions concerning the operations of Applicant following certification should be directed to:

Jessica Epley
Zipty Fiber
135 Lake Street South, Suite 155
Kirkland, WA 98033
(503) 431-0458 (mobile)
jessica.epley@zipty.com
legal@zipty.com

II. GENERAL INFORMATION.

Applicant is currently authorized to provide, intrastate telecommunications services in Idaho, Montana, Oregon and Washington. Applicant has applications pending for, and/or intends to seek authorization or registration to provide, intrastate telecommunications services in Colorado and Nevada. Applicant's parent, Northwest Fiber, LLC, is authorized to provide telecommunications services in the Idaho, Montana, Oregon, and Washington. Applicant has not had a certification or authorization denied, suspended, terminated, or revoked by any state.

Applicant will provide voice telephony and broadband services to enterprise, carrier, wholesale, and residential customers in the State of Utah. Zipty Fiber will offer facilities-based voice over internet protocol, broadband internet access service, and other similar services using its own last-mile fiber network facilities and equipment and the fiber optic facilities and equipment of its affiliate, NFC Northwest, LLC. Applicant has plans to construct and maintain specific facilities in

multiple markets within Utah including the cities of Alpine, Bluffdale, Bountiful, Highland, Logan, Mapleton, and Salem. As the owner of the telecommunications facilities, Applicant will perform network and equipment maintenance necessary to ensure compliance with any quality-of-service requirements. Applicant will comply with all applicable Commission rules, regulations, and standards, and will provide safe, reliable, and high-quality telecommunications services in Utah.

III. REGULATORY AND STATUTORY ELIGIBILITY REQUIREMENTS.

An application for ETC designation in Utah must meet specific federal and state statutory and regulatory requirements. As demonstrated below, Ziply Fiber satisfies the requirements for ETC designation by the FCC pursuant to Section 214(e)(2) of the Act. These include: (1) a certification that the applicant offers or intends to offer all services designated for support by the FCC pursuant to section 254(c) of the Communications Act; (2) a certification that the applicant offers or intends to offer the supported services on a common carrier basis either using its own facilities or a combination of its own facilities and/or resale of another carrier's services; (3) a description of how the applicant advertises the availability of the supported services and the charges therefor using media of general distribution; (4) a detailed description of the geographic service area for which the applicant requests to be designated as an ETC; and (5) a certification that neither the applicant, nor any party to the application, is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.

In addition, an applicant, like Ziply Fiber, seeking designation as an ETC solely for the purpose of offering Lifeline service must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate its ability to satisfy applicable consumer protection and service quality standards; and (4) demonstrate that it is financially and technically

capable of providing Lifeline service.

Finally, prior to designating a carrier as an ETC, the Commission must determine whether such designation is in the public interest. When making a public interest determination, the Commission considers the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offerings.

IV. APPLICANT SATISFIES THE STATUTORY AND REGULATORY REQUIREMENTS.

1. **Common Carrier:** Zippy Fiber is a common carrier as that term is defined in the Act. Zippy Fiber will provide supported services in the State of Utah pursuant to 214(e)(1).

2. **Services Supported by Federal Universal Service:** Zippy Fiber's voice telephony service provides the following: (1) voice grade access to the public switched network or its functional equivalent – the ability to transmit and receive communications with a minimum bandwidth of 300 to 3,500 Hertz (47 C.F.R. 54.101(a)(1)); (2) minutes of use for local service at no additional charge to end users; (3) access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911 (to the extent available in the service area); and (4) toll limitation services to qualifying low-income consumers. Zippy Fiber does not distinguish between toll and non-toll for its voice offering. To the extent Zippy Fiber offers a service that distinguishes between toll and non-toll calls, it will offer toll limitation to qualifying low-income consumers at no additional charge. Per Section 8.1(b) of the FCC's rules, Zippy Fiber also provides broadband internet access service to consumers.

3. **Services Provided by Applicant's Own Facilities or Via Resale:** Zippy Fiber will offer all supported services required under the Act and FCC Rules in the Designated Service Areas using its own last-mile fiber network facilities and equipment and the fiber optic facilities and

equipment of its affiliate, NFC Northwest, LLC. Ziply Fiber will provide broadband services to low-income consumers, which includes VoIP services. The various Lifeline service plans that will be available to qualifying low-income Utah residents, including those on tribal lands, are described in Exhibit C.

In general, Section 214 requires ETCs to provide services using their facilities, at least in part. Ziply Fiber can serve low-income consumers by providing broadband Internet access and voice telephone services. This will allow Ziply Fiber to immediately introduce Lifeline options for Utah residents/consumer as soon as the Commission approves this Petition. Ziply Fiber is building out a network, as described in its CPCN application. Accordingly, pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.101(b), Ziply Fiber will offer its services that are designated for federal universal support using a combination of its own facilities and the facilities of its affiliate, NFC Northwest, LLC. A complete description of the NFC's terms, conditions, and rates applicable for supported services can be found at www.ziplyfiber.com. Because Ziply Fiber is deploying facilities-based broadband services in Utah and other states, there is no need for Ziply Fiber to obtain an approved FCC Compliance Plan in Accordance with the 2012 Lifeline Reform Order.

4. Services to be Provided by NFC throughout the Designated Services Area: Pursuant to 47 C.F.R. § 54.202(a)(1)(i), Ziply Fiber commits to provide service throughout its proposed service area on a timely basis to all customers making a reasonable request for service where facilities are available. Ziply Fiber requests ETC designation to allow the Company to provide Lifeline service wherever its underlying, facilities-based network provides coverage. The current Utah coverage footprint or service area by zip codes is attached hereto as Exhibit D.

5. The Applicant will Advertise the Availability of Services: Pursuant to 47 U.S.C. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2), the Company will advertise the availability of its

broadband services, which includes VoIP, through various marketing channels that may include direct mail, email, local and community outreach events, and targeted online electronic advertising. In addition, the availability of Lifeline service will be publicized in ways that are reasonably designed to reach those who will likely qualify for the service. The Company's marketing efforts will be consistent with and in compliance with Commission rules.

6. **Compliance with Service Requirements:** Pursuant to 47 C.F.R. § 54.202(a)(1)(i), Zply Fiber will comply with the service requirements applicable to the supported services it will be offering in the identified service areas. Zply Fiber's service plans will be offered and supported by Zply Fiber's broadband network. Thus, the Company will be able to commence offering its Lifeline service to all locations served by its underlying network soon after receiving approval from the Commission.

7. **Compliance with any 5-Year Plan Requirements:** Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC. Zply Fiber commits to providing service consistent with the requirements of any other support mechanism pursuant to which it is authorized to receive support in the future.

8. **Consumer Protection and Service Quality Standards:** Zply Fiber commits to comply with all applicable consumer protection and service quality standards for universal service programs.

9. **Ability to Remain Functional During Emergencies:** Zply Fiber's services are able to remain functional in emergency situations as required by 47 C.F.R. Section 54.202(a)(2). Zply Fiber certifies that it maintains adequate backup power to meet state and federal standards. Zply Fiber also engages in preventative maintenance to keep its infrastructure in safe working order. To

guard against service interruptions, such as those caused by natural or man-made events, Ziply Fiber has designed its network so that its critical systems and service locations use diverse fiber routes which have failover capabilities, ensuring its network and services remain available to customers.

10. **Financial and Technical Capabilities:** As part of the 2012 Lifeline Reform Order, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable to provide Lifeline service in compliance with all of the low-income program rules. Ziply Fiber easily satisfies these criteria. As demonstrated in Ziply Fiber's CPCN application,

Applicant does not maintain financial statements separate from the consolidated financial statements of its ultimate parent company, Northwest Fiber, LLC. Applicant's parent company's financial reports (i.e., Northwest Fiber, LLC's reports) are not publicly available; however, its ultimate parent company, BCE Holding Corp., a wholly owned subsidiary of Bell Canada, which is a publicly traded company, maintains financial reports that are publicly available at <https://www.bce.ca/investors/financial-reports/annual-documents>. For purposes of this Application, Applicant will rely on the financial statements of BCE Holding Corp./Bell Canada to demonstrate Applicant's financial qualification to operate within the State of Utah. These financial statements demonstrate the more than adequate financial resources available to Applicant to provide the proposed telecommunications services in Utah. *See also* Exhibit E to Ziply Fiber's CPCN Application (Letters from Bell Canada and Public Sector Pension Investment Board Letter discussing commitment to invest approximately US \$1.5B for operations of the Applicant) (incorporated herein by reference).

As demonstrated, Ziply Fiber is financially stable and capable of honoring its service obligations to customers, as well as meeting its federal and state regulatory obligations. Ziply Fiber

will not rely exclusively on revenues from the provision of Lifeline services for its operating revenues. As noted, Ziply Fiber has access to additional capital resources from its parent and affiliate companies. Ziply Fiber's financial resources position it to expand its operations to serve currently unserved/underserved eligible low-income Utah consumers, and increase competition.

In addition, the proposed Lifeline offerings will be overseen by a team of personnel with substantial industry experience. Attached as Exhibit E is a current list of the Company's key personnel responsible for Ziply Fiber's service offerings, showing that the Company has the expertise necessary to provide the services detailed herein.

11. **Terms and Conditions of Proposed Lifeline Services:** Ziply Fiber affirms that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. Ziply Fiber's Lifeline-supported broadband service will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f).

Attached hereto as Exhibit C is a summary table of the Company's proposed Lifeline service offerings, including voice telephony and broadband internet access service plans. Ziply Fiber's current rate plans for Lifeline service offerings in other states are set forth therein for reference. Eligible Ziply Fiber customers may apply the Lifeline benefit to any service plan offered at their location.

12. **Certifications:** Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria.

Ziply Fiber will use multiple outreach methods including but not limited to nonprofit

partnerships, phone, online, and in person enrollments through Lifeline events. Section 54.410 of the FCC's rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Zply Fiber will accordingly rely on the National Verifier and the National Lifeline Accountability Database ("NLAD"), both administered by the Universal Service Administrative Company ("USAC"), to determine an applicant's eligibility for Lifeline service.

For applicants verified as being eligible by USAC's National Verifier and NLAD, Zply Fiber will complete enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules.

Zply Fiber will comply with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and will coordinate with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.

13. **Commission Regulations:** Zply Fiber declares its ability and goal to comply with all the rules and regulations that the Commission may lawfully impose upon the Applicant's provision of service contemplated by this Petition, including any reporting requirements set by the Commission. If requested, Zply Fiber will answer any questions or present additional testimony and other evidence about its services within the state. In addition, Zply Fiber confirms that it will pass on all support received from the federal USF and UUSF to its qualified Lifeline customers.

14. **Waste, Fraud, and Abuse:** Zply Fiber acknowledges that need to protect federal USF and the UUSF. Zply Fiber has taken steps to prevent duplicate Lifeline benefits being awarded to the same household. As noted, Zply Fiber will comply with the requirements of the NLAD and section 54.404 of the FCC's rules. As part of the application process, the National Verifier queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving

a Lifeline service from Ziply Fiber or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. Consistent with applicable regulations, Ziply Fiber will not seek federal USF and UUSF reimbursement for subscribers until they have activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2).

15. **State Eligibility for Lifeline Support from the UUSF:** To better serve the low-income Utah consumers, the Commission adopted the state Lifeline support as outlined in Utah Administrative Rule 746-8-403 (providing that Lifeline support "may not exceed \$3.50 per Lifeline subscriber per month of subscription to a service that: (A) meets the FCC broadband Lifeline requirements as set for in 47 C.F.R. 54.408"). In addition, an ETC may receive continued distribution if it continues "participation in a Commission-approved Lifeline program" that public interest is found by the Commission. Ziply Fiber will provide Lifeline services that will meet or exceed the requirements in Utah Administrative Rule 746-8-403 to be eligible for UUSF Lifeline support. *See attached Lifeline Plan.*

16. **Public Interest:** The Commission will advance the public interest by designating Ziply Fiber as an ETC so that it can offer Lifeline services. As the Commission is well-aware, there is an increasing need to access voice and broadband services, and low-income Utah consumers often suffer from the lack of affordable and available access. Ziply Fiber is endeavoring to help close the gap by expanding consumer choice and offering discounted services as a Lifeline ETC to customers who have come to rely on these benefits. In addition, because the Applicant is deploying a new broadband network in the designated areas throughout the state, designating Ziply Fiber as an ETC will improve its ability to apply for state broadband funding grants, should ETC designation be

required, to increase service in underserved and unserved areas. This too will serve the public's interest.

17. **Anti-Drug Abuse Certification:** In accordance with section 5301 of the Anti-Drug Abuse Act of 1988, Zply Fiber certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits.

V. CONCLUSION.

Zply Fiber Pacific, LLC requests designation as an ETC for the designated service area for the purpose of receiving federal low-income support and state low-income support.

Dated this 7th day of May, 2026.

BLACKBURN & STOLL, LC

/S/ Brett N. Anderson
Brett N. Anderson
Counsel for NFC Northwest, LLC

LIST OF EXHIBITS

- EXHIBIT A Formation Documents
- EXHIBIT B Certificate of Authority to Transact Business in Utah
- EXHIBIT C Lifeline Service Plans
- EXHIBIT D Service Area
- EXHIBIT E Management Biographies

EXHIBIT A

Formation Documents

In the Matter of the Application of ZIPLY FIBER
for Eligible Telecommunications Carrier
within the State of Utah

Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "ZIPLY FIBER PACIFIC,
LLC", FILED IN THIS OFFICE ON THE FIFTEENTH DAY OF DECEMBER,
A.D. 2021, AT 12:59 O`CLOCK P.M.*



Jeffrey W. Bullock, Secretary of State

6474868 8100
SR# 20214102714

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 205092178
Date: 12-28-21

State of Delaware
Secretary of State
Division of Corporations
Delivered 12:59 PM 12/15/2021
FILED 12:59 PM 12/15/2021
SR 20214102714 - File Number 6474868

CERTIFICATE OF FORMATION
OF
ZIPLY FIBER PACIFIC, LLC

This Certificate of Formation of Ziplly Fiber Pacific, LLC (the “**Company**”) is being duly executed and filed by the undersigned, as an authorized person, to form a limited liability company under the Delaware Limited Liability Company Act (6 Del.C. §18-101, et seq.).

FIRST. The name of the Company formed hereby is “Ziplly Fiber Pacific, LLC”.

SECOND. The address of the Company’s registered office in the State of Delaware is: 251 Little Falls Drive, New Castle County, Wilmington, DE 19808, and the name of the Company’s registered agent at this address is Corporation Service Company.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation as of the 15th day of December, 2021.

Aurelia Tunru

Aurelia Tunru
Authorized Person

EXHIBIT B

Certificate of Authority to Transact Business in Utah

In the Matter of the Application of ZIPLY FIBER for
Eligible Telecommunications Carrier
within the State of Utah



Filed in the Office of <i>Scott Whittaker</i> Director, Division of Corporations and Commercial Code Filed in the State of Utah	Filing Number 260129789968B Filed On January 29, 2026 Entity Number 14655743-0161 Number of Pages 2
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State of Utah
Department of Commerce
Division of Corporations and Commercial Code

Foreign Limited Liability Company - Foreign Registration Statement

ENTITY INFORMATION

Entity Name: Ziply Fiber Pacific, LLC dba Ziply Fiber
Entity Number: 14655743-0161
Effective Date: January 29, 2026
Effective Time: 01:55 PM

BUSINESS DETAILS

Duration Date: Perpetual

BUSINESS CLASSIFICATION:

Foreign Limited Liability Company

FOREIGN DETAILS

Jurisdiction

Country: USA

State: DE

Federal Employer Identification Number: FEIN Status: N/A

Purpose Statement: Telecommunications

PRINCIPAL OFFICE INFORMATION:

Principal Office Address: 135 Lake St. S. Ste. 155 , Kirkland, WA 98033

Mailing Address: 135 Lake St. S. Ste. 155 , Kirkland, WA 98033

FOREIGN OFFICE STREET INFORMATION:

Foreign Business Address: UT

Foreign Mailing Address: UT

REGISTERED AGENT

Agent Type: Entity

Name: CORPORATION SERVICE COMPANY

Address: 15 WEST SOUTH TEMPLE, SUITE 600, Salt Lake City, UT 84101

ACTIVE PRINCIPAL INFORMATION

Title: Manager

Name: Northwest Fiber, LLC

Address: 135 Lake St. S. Ste. 155 , Kirkland, WA 98033

REQUIRED SIGNATURES

- I declare that the information contained in this electronic submission is true and accurate.
- I affirm that I am legally authorized to sign this document.
- I acknowledge receipt of the below information:
 - The information provided in this form will be used by the Division to evaluate and complete your request. Failure to provide complete information as requested will result in the denial of your request as incomplete.
 - Information provided in this form is retained in accordance with state record retention laws. For specific information about the records retention for this form, please visit <https://corporations.utah.gov/records/>.
 - In order to comply with legal and regulatory requirements, we may share information provided in this form with authorized parties such as other government agencies, national licensing databases, contracted vendors, etc. Additionally, many items collected by the Division are classified as “public” under the Government Records Access and Management Act, Utah Code § 63G-2-101 et seq.
 - For more information on how the information you provide is shared, please refer to <https://corporations.utah.gov/records/>.
- I acknowledge that the debts, liabilities, and obligations incurred, contracted for, or otherwise existing with respect to a particular series, if any, are enforceable against the assets of such series only, and not against the assets of the foreign limited liability company generally or any other series.

- **Electronic Signature:** Melissa Chavez
Title/Capacity: Authorized Person

EXHIBIT C

Lifeline Service Plans

In the Matter of the Application of ZIPLY FIBER for
Eligible Telecommunications Carrier
within the State of Utah

Current rate plans for Lifeline service offerings in other states [Exhibit C]

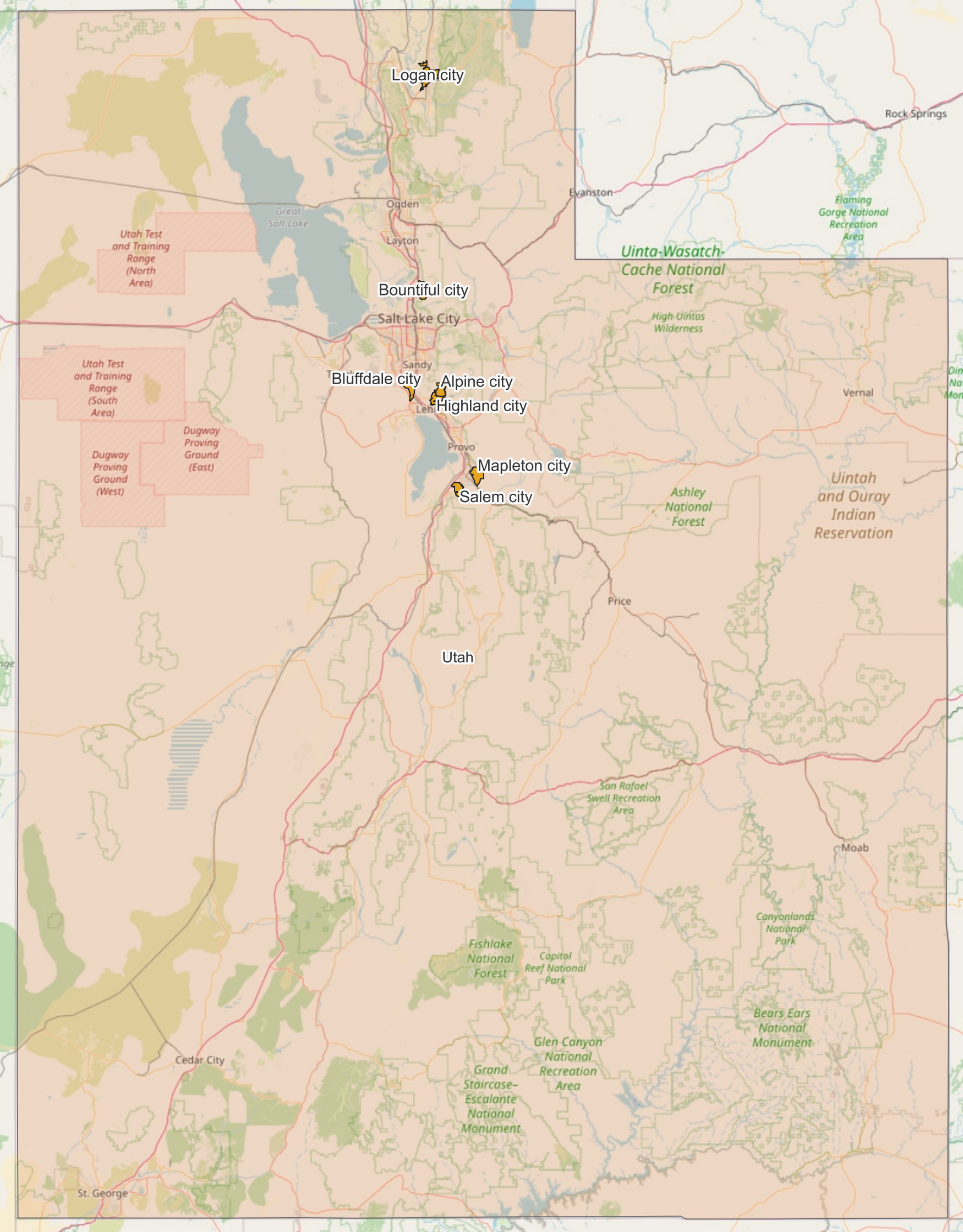
Plan	Speed	Market Rate*	Data Cap
Fiber 100/100	100 Mbps Upload/Download	\$35	None
Fiber 300/300	300 Mbps Upload/Download	\$50	None
Fiber Gig	1000 Mbps Upload/Download	\$65	None
2 Gig Fiber	2000 Mbps Upload/Download	\$80	None

* Rate is subject to change and requires paperless billing and automatic ACH or debit billing

EXHIBIT D

Service Areas

In the Matter of the Application of ZIPLY FIBER for
Eligible Telecommunications Carrier
within the State of Utah



Logan city

Rock Springs

Evanston

Flaming Gorge National Recreation Area

Uinta-Wasatch-Cache National Forest

High Uintas Wilderness

Vernal

Uintah and Ouray Indian Reservation

Ashley National Forest

Utah

Price

San Rafael Swell Recreation Area

Moab

Canyonlands National Park

Bears Ears National Monument

Glen Canyon National Recreation Area

Fishlake National Forest

Capitol Reef National Park

Grand Staircase-Escalante National Monument

Cedar City

St. George

Utah Test and Training Range (North Area)

Utah Test and Training Range (South Area)

Dugway Proving Ground (West)

Dugway Proving Ground (East)

Great Salt Lake

Ogden

Layton

Bountiful city

Salt Lake City

Sandy

Bluffdale city

Alpine city

Highland city

Lehi

Provo

Mapleton city

Salem city

EXHIBIT E

Management Biographies

In the Matter of the Application of ZIPLY FIBER for
Eligible Telecommunications Carrier
within the State of Utah

ZiPLY Fiber Pacific, LLC: Managerial Capacity

Northwest Fiber LLC purchased the existing ILEC network assets from Frontier Communications Corporation in May 2020. We established ZiPLY Fiber Pacific a Competitive Local Exchange Carrier (CLEC) in the states of Idaho, Montana, Oregon, and Washington in December 2021. We do business as ZiPLY Fiber. The ZiPLY Fiber name is aimed at communicating our value proposition and reflecting our core values. What we do is provide a fast connection— hence “Zip”. How we do it is with great service – friendly, transparently, enthusiastically – hence – “ly”. The name ZiPLY Fiber is intended to convey to our customers that we offer one of the fastest and most reliable connections through advanced fiber optics. As importantly, the name is intended to convey that we do our jobs honestly and thoroughly; we work efficiently, capably, and confidently; and we act personably, responsibly, and enthusiastically.

The ZiPLY Fiber leadership team has extensive executive level experience; each of our Leadership Team members has over 20 years’ experience in executive roles. Chief Executive Officer Harold Zeitz has more than 30 years of experience in technology and innovation. Prior to joining ZiPLY Fiber, Harold served as President and Chief Operating Officer of Wave Broadband. Prior to joining Wave Broadband, Harold served in executive and leadership roles at Classmates.com, International Game Technology, RealNetworks, Sharebuilder, AT&T Wireless and McCaw Cellular.

Chief Technology Officer Brian Bond is a telecommunications industry veteran with 25 years of experience in network architecture, engineering and product innovation. As the Chief Technology Officer at Brightspeed, Brian drove innovations to accelerate fiber deployment and customer experience.

Chief Operations Officer Chris Denzin has over 30 years of telecommunications industry experience. Chris spent 26 years with CenturyLink in Arizona, Colorado, Oregon, and Washington prior to joining ZiPLY Fiber.

Brian Economaki serves as Senior Vice President of Fiber Design & Construction. Brian has over 15 years’ experience in operations roles within the telecommunications industry.

General Counsel Elana Zana has over 15 years of experience advising companies and municipalities on legal, regulatory, and infrastructure matters pertaining to telecommunications and technology. Prior to joining ZiPLY Fiber, Elana was a partner at Ogden Murphy Wallace, where she counseled municipalities on franchise agreements and broadband and wireless deployment.

In addition to the executive leadership team, ZiPLY Fiber has highly qualified staff leading teams supporting our daily operations and network growth.

The multi-disciplinary team of “Key Personnel” directly engaged in the project development, implementation and reporting are overseen by the Senior Vice President Fiber Design &

Construction Brian Economaki, the Chief Technology Officer, Brian Bond, and Chief Legal Counsel, Elana Zana. The team includes the following:

- Rob Larson, Vice President – Fiber Design & Engineering: Holds 26 years of experience in network planning and engineering. He has managed teams responsible for Outside Plant planning across multi-state regions, including feeder and distribution fiber and electronics. Rob is responsible for planning the Ziplly Fiber network expansion, business case development, project oversight and development of network strategies.
- Laina Morris, Vice President – Fiber Construction: Holds over 40 years of experience in leading, managing, training, coaching, and motivating Managers and Occupational in the Telecommunications industry. Liana manages a team of 7 Managers and Directors whose teams manage the day-to-day activities of outside plant construction vendors. Her leadership and depth of industry knowledge and management skills ensure goals are met in a timely and professional manner.
- Jason Ackerman, Vice President - Network Growth & Integration: Holds over 15 years of experience in the telecommunications industry. Jason has a passion for building scalable, best in class networks that are resilient and offer cost effective end user solutions. Jason manages a team of seven staff who provide engineering, operational and provisioning tasks daily to maintain the Ziplly Fiber network.
- Jessica Epley, Vice President Regulatory & External Affairs: Holds over 20 years of experience of leading and managing teams responsible for regulatory compliance and government relations at the local, state, and federal level. Jessica's team of six is dedicated to external affairs, public-private partnerships, policy advocacy, and regulatory compliance.