



Carrier Customer Bulletin

Date of Notice: August 3, 2022
Notice Number: NWFZF-22-0093
Target Audience: Carrier, IXC, Wireless, CLEC, Reseller, ISP
Subject: Notice of Discontinuance of UNE Analog Loops & Notice that Interconnection Agreement is Amended Per Change of Law Provision
Effective Date: September 2, 2022

Pursuant to your company's interconnection agreement(s) (the "Agreement") for any and all state(s) in which your company has an Agreement with a ZiPLY Fiber incumbent local exchange carrier under Sections 251 and 252 of the Communications Act of 1934 (the "Act"), this letter provides notice to your company that ZiPLY Fiber will discontinue services in accordance with recent orders by which the Federal Communications Commission ("FCC") has discontinued the following products and services previously provided under Section 251(c) of the Act, subject to FCC established transition periods:

- Unbundled 2-wire and 4-wire analog voice grade copper loops, including the attached TDM equipment ("UNE Analog Loops").

In the UNE Loop-Resale Order, the FCC ruled that additional UNE Analog Loops are no longer available as of February 1, 2020¹. The FCC established a transition period during which the CLECs may retain UNE Analog Loops until August 2, 2022. In-service UNE Analog Loops ordered by your company on or before February 1, 2020, were grandfathered through August 2, 2022.

On or before September 2, 2022, your company must convert UNE Analog Loops to an alternate non-UNE service (e.g. as a service provided under a ZiPLY Fiber applicable tariff or price list). If no action is taken, the rates will be revised to the new effective pricing. Revised rates for these products can be found at the following links:

- WA: <https://wholesale.ziPLYfiber.com/-/media/Wholesale/Files/doc/wa-catalog-unbundled-network-elements-effective-september-2-2022.pdf>
- OR: <https://wholesale.ziPLYfiber.com/-/media/Wholesale/Files/doc/zfn-or-une-rates-effective-september-2-2022.pdf>

After the FCC established transition period, if your company has not stopped ordering products and services that are no longer available and/or has not converted products and services that are to be converted by the applicable deadline(s), ZiPLY Fiber will, in its discretion, convert any or all of those products and services and bill (or bill-back as applicable) the now applicable, higher rate.

¹ Memorandum Opinion and Order, WC Docket Nos.18-141 et al. (rel. Aug. 2, 2019) ("UNE Loop Resale Order" and together with the UNE Transport Forbearance Order, the "FCC Forbearance Orders").

Please note that the Agreement contains change of law provisions that are self-effectuating and do not require an amendment to implement changes of law. Zply Fiber will implement the change in law accordingly.

If you have any questions regarding the issues addressed in this notice, please contact your account manager.

If you have questions regarding the information provided in this notice, please email wholesale@zplyfiber.com.