

## ATTACHMENT 1

### NOTIFICATION OF *PRO FORMA* TRANSFER OF CONTROL OF INTERNATIONAL SECTION 214 AUTHORIZATIONS

Pursuant to Section 63.24(f) of the Federal Communications Commission's ("Commission") rules,<sup>1</sup> Northwest Fiber, LLC d/b/a Ziplly Fiber ("Northwest Fiber") notifies the Commission of the *pro forma* transfer of control of the international Section 214 authorizations held by Northwest Fiber's subsidiary Ziplly Fiber Northwest, LLC ("Ziplly Fiber NW"), ICFS file nos. ITC-214-20000703-00390 and ITC-214-20080219-00079.

#### Answer to Item 16

On December 31, 2025, Northwest Fiber completed a corporate restructuring that resulted in the elimination of two intermediate holding companies in Ziplly Fiber NW's ownership structure. Prior to completion of the *pro forma* transaction, Ziplly Fiber NW was a direct wholly owned subsidiary of Ziplly Fiber Issuer, LLC. Ziplly Fiber Issuer, LLC was a direct wholly owned subsidiary of Ziplly Fiber Holdings, LLC, which, in turn, was a direct wholly owned subsidiary of Northwest Fiber. The *pro forma* transaction resulted in the merger of Ziplly Fiber Issuer, LLC with and into Ziplly Fiber Holdings, LLC, and the subsequent merger of Ziplly Fiber Holdings, LLC with and into Northwest Fiber. As a result, Ziplly Fiber Issuer, LLC and Ziplly Fiber Holdings, LLC were eliminated from Ziplly Fiber NW's ownership structure, and Ziplly Fiber NW, which was previously an indirect wholly owned subsidiary of Northwest Fiber, became a direct wholly owned subsidiary of Northwest Fiber. The transaction therefore constituted a non-substantive *pro forma* transaction because it resulted in the elimination of two intermediate holding companies in Ziplly Fiber NW's ownership structure but did not result in any change in the actual controlling party of Ziplly Fiber NW.<sup>2</sup>

#### Answer to Item 19

The following entities hold, directly or indirectly, a 10 percent or greater voting or equity interest in Ziplly Fiber NW.

Ziplly Fiber NW is a direct wholly owned subsidiary of Northwest Fiber:

|                     |                                                                |
|---------------------|----------------------------------------------------------------|
| Name:               | Northwest Fiber, LLC d/b/a Ziplly Fiber<br>("Northwest Fiber") |
| Address:            | 135 Lake Street South<br>Suite 155<br>Kirkland, WA 98033       |
| Citizenship:        | United States (Delaware)                                       |
| Principal Business: | Holding Company                                                |

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<sup>1</sup> 47 C.F.R. § 63.24(f).

<sup>2</sup> See 47 C.F.R. § 63.24(d), Note 2.

Interest Held: 100% equity and voting (directly in Zipl  
Fiber NW)

Northwest Fiber is a direct wholly owned subsidiary of Northwest Fiber Ultimate Holdings, LLC:

Name: Northwest Fiber Ultimate Holdings, LLC  
("Northwest Ultimate")  
Address: 135 Lake Street South  
Suite 155  
Kirkland, WA 98033  
Citizenship: United States (Delaware)  
Principal Business: Holding Company  
Interest Held: 100% equity and voting (directly in  
Northwest Fiber)

Northwest Ultimate is a direct wholly owned subsidiary of BCE Holding Corporation:

Name: BCE Holding Corporation ("BCE Holding")  
Address: c/o Corporation Service Company  
251 Little Falls Drive  
Wilmington, DE 19808  
Citizenship: United States (Delaware)  
Principal Business: Holding Company  
Interest Held: 100% equity and voting (directly in  
Northwest Ultimate)

BCE Holding is a direct wholly owned subsidiary of Bell Canada:

Name: Bell Canada  
Address: 1 Carrefour Alexander-Graham-Bell, A-7  
Verdun, Quebec H3E 3B3  
Canada  
Citizenship: Canada  
Principal Business: Information and Communications  
Technology  
Interest Held: 100% equity and voting (directly in BCE  
Holding)

Bell Canada is a direct subsidiary of BCE Inc.:

Name: BCE Inc.  
Address: 1 Carrefour Alexander-Graham-Bell, A-7  
Verdun, Quebec H3E 3B3  
Canada  
Citizenship: Canada

Principal Business: Information and Communications  
Technology; Holding Company  
Interest Held: 94.1% equity and voting (directly in Bell  
Canada)

There are no additional individuals or entities that own or control, directly or indirectly, a 10 percent or greater voting or equity interest in Ziply Fiber NW.

**Answer to Item 20**

The following officers and/or directors of Northwest Fiber and Ziply Fiber NW are also officers and/or directors of a foreign carrier identified in response to Item 21 below:

- Mirko Bibic, an officer of Northwest Fiber and Ziply Fiber NW, is a director and an officer of Bell Canada.
- Geneviève Filion, an officer of Northwest Fiber and Ziply Fiber NW, is an officer of Bell Mobility Inc., Bell MTS Inc., Bell Canada, and Northwestel Inc. Geneviève Filion is also an officer of the General Partner that controls Group Maskatel Québec L.P.,<sup>3</sup> which does not have its own officers or directors.
- Melanie Schweizer, an officer of Northwest Fiber and Ziply Fiber NW, is an officer of Bell MTS Inc. and Bell Canada, and a director and officer of Bell Mobility Inc. Melanie Schweizer is also a director and officer of the General Partner that controls Group Maskatel Québec L.P., which does not have its own officers or directors.

Northwest Fiber and Ziply Fiber NW do not have any other interlocking directorates with foreign carriers.<sup>4</sup>

**Answer to Item 21**

Northwest Fiber and Ziply Fiber NW are affiliated with Bell Canada, including its wholly owned subsidiaries Bell Mobility Inc., Group Maskatel Québec L.P., iTEL Networks Inc., NorthernTel Limited Partnership, Northwestel Inc., Télébec Limited Partnership, and Bell MTS Inc. Each of the foregoing entities is authorized to provide telecommunications services in Canada, which is a Member of the World Trade Organization (“WTO”). Northwest Fiber and Ziply Fiber NW are not affiliated with any other foreign carriers.

The Applicants certify that they do not seek to provide international telecommunications services to any destination country other than Canada where:

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<sup>3</sup> Group Maskatel Québec L.P.’s General Partner, 11560948 Canada Inc., is a wholly owned subsidiary of Bell Canada.

<sup>4</sup> NorthernTel Limited Partnership and Télébec Limited Partnership do not have their own officers or directors and are managed by their General Partner, Bell Canada. As such, Mirko Bibic, Geneviève Filion, and Melanie Schweizer are part of the management of NorthernTel Limited Partnership and Télébec Limited Partnership by virtue of their officer positions with Bell Canada.

1. An Applicant is a foreign carrier in that country; or
2. An Applicant controls a foreign carrier in that country; or
3. Any entity that owns more than 25 percent of an Applicant, or that controls an Applicant, controls a foreign carrier in that country; or
4. Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of an Applicant and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing or international basic telecommunications services in the United States.

Pursuant to Section 63.10(a)(4) of the Commission's rules,<sup>5</sup> the Applicants seek to be classified as non-dominant on the U.S.-Canada route. Ziply Fiber NW provides international switched service solely through the resale of unaffiliated U.S. facilities-based carriers' international switched services and thus should presumptively be classified as non-dominant for the provision of the authorized service. Specifically, Ziply Fiber NW uses Lumen, Bandwidth, and Peerless for international interexchange ("IXC") termination.

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<sup>5</sup> 47 C.F.R. § 63.10(a)(4).