

March 21, 2025

***Via eFile***

The Honorable Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Protest of Application for Approval of the Discontinuance of Competitive Access Services filed by Everstream Solutions LLC; Docket No. A-2025-3053757; U/C 3123564**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code Section 5.52,<sup>1</sup> Zito Media Communications, LLC (“Zito”) respectfully submits this protest to Everstream Solutions LLC’s (“Everstream”) Application for Approval of the Discontinuance of Competitive Access Services in Pennsylvania on or after June 30, 2025 (“Application”).<sup>2</sup> To support its protest, Zito has attached as Exhibit A, its opposition filed in response to the Federal Communications Commission’s (“FCC”) Public Notice seeking comment on Everstream’s application for discontinuance of service.<sup>3</sup>

As explained in Zito’s FCC opposition, Zito provides broadband internet, video, and digital phone services to residential and commercial customers throughout Pennsylvania. In addition,

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<sup>1</sup> 52 Pa. Code §§ 5.52 (a)(1)-(3) sets forth the prerequisites for filing protests filed with the Commission. Zito satisfies these prerequisites because it has a vested interest in ensuring continuity of service and access to facilities Everstream proposes to discontinue. Further, Zito has standing because it is directly affected by Everstream’s proposed discontinuance and requests that the Commission deny the request for the reasons set forth herein and in the FCC pleading attached as Exhibit A.

<sup>2</sup> *Everstream Solutions LLC’s Application for Approval of the Discontinuance of Competitive Access Services* (Mar. 5, 2025) (proposing to discontinue its facilities-based competitive access services offered to business enterprise customers, including wavelength, managed services, and point-to-point and point-to-multipoint Ethernet in Pennsylvania on June 30, 2025).

<sup>3</sup> *Comments Invited on Everstream Solutions LLC’s Application to Discontinue Domestic Non-Dominant Carrier Telecommunications Services and/or Interconnected VOIP*, Federal Communications Commission Public Notice, DA 25-194, WC Docket No. 25-100 (Mar. 5, 2025) (proposing to automatically discontinue its wavelength, managed services, hosted PBX, Ethernet direct internet access, point-to-point and point-to-multipoint Ethernet, and interconnected VoIP in Delaware, Maryland, New Jersey, New York, and Pennsylvania).

Zito has also established and currently operates a highly resilient Emergency Services IP Network (“ESInet”) in the Commonwealth. This ESInet is integral to supporting Pennsylvania’s Next Generation 911 (“NG911”) systems and providing dedicated infrastructure to facilitate emergency response and public safety operations for public safety agencies across all sixty-seven counties in the Commonwealth.

Zito’s FCC opposition pleading demonstrates that Everstream provides certain fiber facilities to Zito which are used to support Zito’s services in Pennsylvania. The fiber facilities are deployed in the Zito network to provide essential network route redundancies and backup call routing paths during outages and emergencies for the statewide ESInet and Southern Alleghenies 911 Cooperative, as well as backhaul for a national wireless carrier’s tower in rural Slatington. Thus, Everstream’s planned discontinuance of services and fiber facilities would eliminate critical network redundancy, backup call routing paths and backhaul circuits, thereby increasing the risk of network failure for public safety and consumer communications in Pennsylvania.

After receiving Everstream’s February 3, 2025, letter explaining its plans to discontinue all of its communications services on June 30, 2025, Zito made efforts to identify alternative providers to replace Everstream’s fiber. However, because the existing fiber is in rural and remote areas of Pennsylvania, there are no readily available options that could provide or build out service prior to Everstream’s proposed discontinuance on June 30, 2025. Therefore, Everstream’s proposed discontinuance of service would effectively remove the fiber from Zito’s network, leaving the ESInet, Southern Alleghenies 911 Cooperative, Slatington tower network connectivity, and other communications networks vulnerable during emergencies and outages.

Accordingly, Zito respectfully requests that the Commission deny Everstream’s application for approval of the abandonment or discontinuance of Competitive Access Provider Services in Pennsylvania on or after June 30, 2025. Please contact Zito’s undersigned counsel if there are any additional questions concerning this matter.

Respectfully submitted,

*//s// Nellie Dunderdale* \_\_\_\_\_

Nellie Dunderdale (PA Bar ID No. 321891)

K.C. Halm

Kasey McGee

**Davis Wright Tremaine LLP**

1301 K Street NW

Suite 500 East

Washington, D.C. 20005

(202) 973-4287

[NellieDunderdale@dwt.com](mailto:NellieDunderdale@dwt.com)

[KCHalm@dwt.com](mailto:KCHalm@dwt.com)

[KaseyMcGee@dwt.com](mailto:KaseyMcGee@dwt.com)

*Counsel for Zito Media Communications, LLC*

Verification

Pursuant to 52 Pa. Code Section 1.36(b), I swear that the facts I am presenting in this Protest are true and correct to the best of my knowledge, information, and belief. I understand that the statements I am making in this Protest are made subject to the penalties of 18 Pa.C.S. Section 4904 (relating to unsworn falsification to authorities).

Executed this 21<sup>st</sup> day of March 2025.



Colin Higgin  
Vice President  
Zito Media Communications, LLC

## CERTIFICATE OF SERVICE

I, Kasey McGee, certify that I served a copy of the foregoing Zito Media Communications, LLC, Protest of the Application for Approval of the Discontinuance of Competitive Access Services filed by Everstream Solutions LLC, on March 21, 2025 as follows:

***Via Email***

Russell M. Blau  
Danielle Burt  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Ave, N.W.  
Washington, DC 20004-2541  
russell.blau@morganlewis.com  
danielle.burt@morganlewis.com

Catherine G. Vasudevan  
Morgan, Lewis & Bockius LLP  
2222 Market St.  
Philadelphia, PA 19103-2921  
catherine.vasudevan@morganlewis.com

***Via US Mail***

Everstream Solutions LLC  
Attn: Legal Department  
1228 Euclid Ave.  
Suite 250  
Cleveland, OH 44115



Kasey McGee

**EXHIBIT A**

**Zito Media Communications, LLC Opposition to Everstream Solutions LLC's  
Application for Discontinuance**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Everstream Solutions LLC	)	WC Docket No. 25-100
	)	
Section 214 Application to Discontinue	)	Comp. Pol. File No. 1990
Domestic Non-Dominant Carrier	)	
Telecommunications and/or VoIP Services	)	DA 25-194

**OPPOSITION TO EVERSTREAM SOLUTIONS LLC  
APPLICATION FOR DISCONTINUANCE**

Pursuant to Section 214(a) of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> Section 63.71(a) of the Commission’s rules,<sup>2</sup> and the Public Notice issued in the above-referenced proceeding, Zito Media Communications, LLC (“Zito”) respectfully submits its opposition to Everstream Solutions LLC’s (“Everstream”) application for discontinuance (the “Application”) of all communications services in the Commonwealth of Pennsylvania on or after June 30, 2025.<sup>3</sup>

The Commission should deny Everstream’s request to discontinue certain fiber services and facilities discussed herein that Everstream provides to Zito in Pennsylvania, and which Zito uses to provision services to its public safety emergency service and cell tower backhaul customers in the Commonwealth. Discontinuance of such fiber services will have a significant negative impact on the public interest, convenience and necessity, in light of the fact that no

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<sup>1</sup> 47 U.S.C. § 214(a).

<sup>2</sup> 47 C.F.R. § 63.71(a).

<sup>3</sup> *Comments Invited on Everstream Solutions LLC’s Application to Discontinue Domestic Non-Dominant Carrier Telecommunications Services and/or Interconnected VOIP*, Public Notice, DA 25-194, WC Docket No. 25-100 (Mar. 5, 2025) (proposing to automatically discontinue its wavelength, managed services, hosted PBX, Ethernet direct internet access, point-to-point and point-to-multipoint Ethernet, and interconnected VoIP in Delaware, Maryland, New Jersey, New York, and Pennsylvania).

substitute for these services can be obtained in a timely manner.

## **I. Background**

Zito provides broadband internet, video, and digital phone service to numerous residential and commercial customers across Pennsylvania.<sup>4</sup> In addition, Zito has constructed and currently operates a highly resilient Emergency Services IP Network (“ESInet”) that supports Pennsylvania’s Next Generation 911 (“NG911”) systems.<sup>5</sup> This critical emergency service network provides public safety agencies in all sixty-seven counties within the Commonwealth with access to a high-capacity, fully redundant, and dedicated network that supports emergency response and public safety agencies. The physical plant has been designed and constructed with redundant and diverse physical paths to connect all public safety answering points (“PSAPs”) in order to satisfy the required system availability, capacity, and redundancy specifications for ESInets and NG911.<sup>6</sup> Zito’s fiber infrastructure is deployed at the physical layer of the ESInet and consists of a combination of Zito-owned fiber strands and third-party provider fiber strands that have been obtained through contractual vehicles including fiber exchanges (swaps) and Indefeasible Rights of Usage (“IRU”) agreements. Among these

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<sup>4</sup> Zito is an independently owned and operated company headquartered in Potter County, Pennsylvania. Zito is a leading communications service provider delivering digital cable, high-speed internet, and digital phone services. Serving numerous communities across 22 states, Zito Media is dedicated to delivering exceptional connectivity solutions to its customers.

<sup>5</sup> The Commission and public safety community are evolving the industry and NG911 to meet the National Emergency Number Association’s (“NENA”) “i3” standard. This standard uses ESInets, which are IP-based inter-networks that can be shared by all public safety agencies that may be involved in an emergency. ESInets are the future of emergency networks because they can accommodate both legacy wireline and wireless originating networks in a manner needed to process multimedia emergency calls and data. *See generally, Facilitating Implementation of Next Generation 911 Services (NG911)*, Report and Order, FCC 24-78, PS Docket Nos. 21-479, 18-64 (July 19, 2024) (*NG911 Transition Order*).

<sup>6</sup> *See NG911 Transition Order*, at paras. 186-189 (emphasizing the importance of additional IP transport in emergency communication networks to create diverse paths for 911 calls that allow them to be re-directed and redistributed among PSAPs in the event of outages).

arrangements is an agreement<sup>7</sup> between Zito and Everstream in which Everstream provides Zito access to several fiber strands that provide services to several members of the South Central Mountain Region task force of Pennsylvania. These fiber strands are also deployed in the ESInet and are vital because they directly support network redundancy and ensure the availability of diverse paths for emergency communications to the Southern Alleghenies 911 Cooperative,<sup>8</sup> and the Commonwealth's ESInet as a whole. These fiber strands also support certain commercial voice services that Zito provides to the PSAP in Somerset County, which also serves as a potential backup call routing path in the event of a catastrophic failure in the ESInet's capabilities or connectivity.

In addition to the fiber strands supporting the ESInet, Everstream also provides Zito dark fiber cable capacity in Slatington, Pennsylvania. Zito uses this fiber cable to connect a national wireless carrier's tower in this rural location to the core network,<sup>9</sup> and leverages this dark fiber cable to provide backhaul service from the tower to a Mobile Switching Center in the Philadelphia region.

On February 3, 2025, Zito received a letter from Everstream explaining its plans to discontinue "all of its communications services" in Pennsylvania effective June 30, 2025. This

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<sup>7</sup> Zito and Everstream executed a Letter of Assignment on February 8, 2021, confirming the assignment of Uniti Fiber LLC's assets under a June 22, 2017, Master IRU Fiber Exchange Agreement between Uniti Fiber LLC and Zito.

<sup>8</sup> The Southern Alleghenies 911 Cooperative is a consortium of seven counties (Cambria, Somerset, Bedford, Blair, Centre, Fulton, and Huntingdon) to interconnect the 911 centers, improve redundancy, and transition to NG911. See *Planned Fiber-Optic Network to Link 911 Centers of 7 Counties*, GOVERNMENT TECHNOLOGY (Apr. 23, 2019), available at <https://www.govtech.com/em/safety/planned-fiber-optic-network-to-link-911-centers-of-seven-counties-pa.html> (quoting the Blair County's 911 director regarding the creation of the consortium, "[O]ne of my biggest concerns has always been redundancy. What happens if our 911 center goes down? Who's going to handle our calls? How does 911 continue to survive?"); Michelle Ganass, *Fiber project will connect 911 centers in seven counties*, DAILY AMERICAN (Apr. 22, 2019), available at <https://www.dailyamerican.com/story/news/local/2019/04/22/fiber-project-will-connect-911-centers-in-seven-counties/116095158/>.

<sup>9</sup> This rural tower provides critical connectivity to the small town of Slatington, drivers on Pennsylvania Turnpike, and hikers on the Appalachian Trail.

proposed discontinuance of service includes the fiber strands Zito obtains from Everstream to provide service to the Pennsylvania ESInet, the Southern Alleghenies 911 Cooperative,<sup>10</sup> and the wireless backhaul for the cell tower in rural Slatington.<sup>11</sup> After receiving this notice from Everstream, Zito has taken steps to identify a substitute service provider for the impacted fiber cables. The company has worked to identify other providers that may own or operate fiber in these regions of Pennsylvania, but has yet to find a suitable substitute. Note that even if Zito were able to quickly identify an alternative provider it would certainly take many months to negotiate the terms of a new agreement with such provider and plan for a transition from Everstream to the new provider. Because of the remote locations of most of the fiber at issue Zito anticipates that new fiber construction will be required to interconnect a new provider's fiber to the existing locations—a process that takes significant time.<sup>12</sup> At this time, however, Zito has not been able to identify a reasonable substitute provider for fiber services that can be obtained before Everstream's proposed service discontinuance on June 30, 2025. Therefore, as discussed below, Zito respectfully requests that the Commission deny Everstream's Application to discontinue communications services in Pennsylvania in order to protect public convenience and necessity and prevent the discontinuance of fiber services that Zito utilizes to serve its public safety customers from being disconnected on June 30, 2025.

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<sup>10</sup> The fiber paths that are part of the Southern Alleghenies 911 Cooperative and the Commonwealth's ESInet impacted by Everstream's discontinuation of service are depicted in Exhibit A.

<sup>11</sup> The fiber cable providing backhaul in Slatington, Pennsylvania, impacted by Everstream's discontinuation of service is depicted in Exhibit B.

<sup>12</sup> Note that this would entail not only establishing new fiber for the A-Z paths, but also deploying to additional drop locations along the paths where Zito serves existing customers.

## II. Discontinuance Standard

Section 214(a) of the Act states that “[n]o carrier shall discontinue, reduce, or impair service to a community, or part of a community, unless and until there shall first have been obtained from the Commission a certificate that neither the present nor future public convenience and necessity will be adversely affected thereby.”<sup>13</sup> The Commission typically automatically grants applications for discontinuance unless it is shown that the applicant’s customers or other end users would be unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity would be otherwise adversely affected.<sup>14</sup> In line with its statutory obligations to protect public interest, when the Commission receives comments that evidence there are no other reasonably available substitutes for service or that the public convenience and necessity will be adversely affected by the service discontinuance, the Commission may remove the application from the automatic grant process for additional scrutiny.<sup>15</sup>

## III. Discussion

Consistent with precedent, the Commission should deny Everstream’s Application for discontinuation of service in Pennsylvania with respect to the specific services identified herein

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<sup>13</sup> 47 U.S.C. § 214(a).

<sup>14</sup> See 47 C.F.R. § 63.71(a)(1).

<sup>15</sup> See *AT&T Communications Application To Discontinue Domestic Telecommunications Services Not Automatically Granted*, Public Notice, DA 03-2623, Comp. Pol. File No. 645 (Aug. 8, 2003) (*AT&T Public Notice*) (denying AT&T’s application to automatically discontinue service because the public interest would not be served based on the number of comments in the proceeding that raised significant concerns regarding the ability of AT&T’s customers to provide continued service to their own customers under AT&T’s proposed discontinuance schedule); *In the Matter of Corban Telecommunications Inc.’s Application to Discontinue Domestic Telecommunications Services*, Order, DA 02-2347, Comp. Pol. File No. 603, 17 FCC Rcd 18392 at para. 1 (Sept. 27, 2002) (*Corban Telecommunications Discontinuance Order*) (denying Corban Telecommunication’s application to automatically discontinue service in part to “allow the Bureau further time to develop the record regarding the concerns of customers that have filed objections to Corban’s application on the grounds that they will be unable to acquire a reasonable substitute service by Corban’s requested discontinuance date of October 19, 2002”).

because discontinuance of the fiber strands supporting the ESInet and the backhaul circuit to the cell tower in Slatington adversely impacts the public convenience and necessity and could be detrimental to public safety. As discussed above, Zito relies on various Everstream fiber strands to deploy its service to the Pennsylvania ESInet and the Southern Alleghenies 911 Cooperative, and to provide wireless backhaul services to the cell tower in rural Slatington. Despite Zito's efforts to identify and obtain a reasonable substitute from another carrier, there is no commercially feasible solution to identify a new provider for each of these fiber strands, negotiate new terms of access, and then transition to such fiber strands prior to Everstream's proposed June 30, 2025, discontinuance date. Therefore, Everstream's proposed discontinuance would effectively eliminate the fiber strands identified herein from service and prevent Zito from continuing to serve its customers.

The Commission has an obligation under the Act to protect and promote the public's interest. As explained in the *Corban Telecommunications Discontinuance Order*, the primary purpose of the discontinuance provision of Section 214(a) is "to reduce the harm to consumers caused by discontinuances of service . . . ,” which is why the Bureau has retained the right to delay grant of a discontinuance authorization if the Bureau believe[s] “an unreasonable degree of customer hardship would result [from the service discontinuance].”<sup>16</sup> Removing Everstream's fiber strands from Zito's network is not in the public interest because it will eliminate redundancy in critical emergency service networks and increase the risk of network failure for the public safety industry in Pennsylvania. Everstream's fiber strands are instrumental in providing diverse network pathways for fiber network supporting the Pennsylvania ESInet and Southern Alleghenies 911 Cooperative emergency service communications. Decommissioning

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<sup>16</sup> *Corban Telecommunications Discontinuance Order*, 17 FCC Rcd 18394 at para. 6.

Everstream's fiber strands will directly result in the loss of critical network redundancy for PSAPs in the counties of Somerset,<sup>17</sup> Bedford, Fulton, Franklin, Adams, and York, as well as the Commonwealth's ESInet as a whole.

The Commission has emphasized that sufficient network capacity in ESInets like this one "is vital for the smooth operation of emergency communication networks because it ensures the availability of diverse paths that allow intelligent call diversion processes for 911 calls to be re-directed or redistributed among PSAPs based on outages, maintenance, or other emergencies."<sup>18</sup> In this case Everstream's fiber strands provide the redundancy necessary to ensure operational continuity for the public safety industry from incidents ranging from outages to large-scale disasters. The Commission has long recognized that loss of redundancy in networks results in less reliable networks that can be devastating for public safety and emergency communications.<sup>19</sup>

In the *Corban Telecommunications Discontinuance Order*, the Commission denied Corban Telecommunication's request for automatic discontinuance because it found that discontinuance of microwave transmission services would disrupt essential weather and emergency broadcast functions, and that "*the effect of the discontinuance on public safety in a number of communities could be devastating.*"<sup>20</sup> Here, Everstream's proposed discontinuance of

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<sup>17</sup> Discontinuance of Everstream's services will also have a direct, harmful impact on the commercial voice services Zito provides to the PSAP in Somerset County. These services provide important connectivity to emergency responders and also serve as a potential backup call routing path in the event of a catastrophic failure in the ESInet's capabilities or connectivity.

<sup>18</sup> See *NG911 Transition Order*, at paras. 186-189.

<sup>19</sup> See *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, Notice of Inquiry, FCC 11-55, PS Docket Nos. 11-60, 10-92, et al., at para. 26 (Apr. 11, 2011) (*Reliability NOI*) (noting that the Commission's investigation into Katrina "found that inadequate backhaul redundancy also plays a significant role in contributing to service disruptions during major emergencies"); *Improving 9-1-1 Reliability*, Notice of Proposed Rulemaking, FCC 13-33, PS Docket Nos. 13-75, 11-60, at para. 12 (Mar. 20, 2013) (providing an example of a carrier that experienced generator failure and had a deficiency in network redundancy, which ultimately compromised the carrier's network monitoring functions and disrupted service to multiple PSAPs).

<sup>20</sup> *Corban Telecommunications Discontinuance Order*, 17 FCC Rcd 18394 at para. 7 (emphasis added).

service would result in an unreliable network that could have a significant and detrimental impact on statewide public safety communication in Pennsylvania—putting both communities and lives at risk.

Additionally, if Everstream discontinues service, Zito’s inability to access the dark fiber strand that supports the backhaul services to a national wireless carrier’s tower in Slatington would have a detrimental impact on Pennsylvanians that rely on the coverage from that tower. Because of the limited alternative capacity available in this area, the loss of coverage from this cell tower for the public in this area, including travelers on the Pennsylvania turnpike and hikers on the Appalachian Trail, could have a deleterious effect.<sup>21</sup>

As explained above, the rural and remote location of the fiber strands at issue here presents unique challenges for finding reasonable substitute services. There are simply not many fiber providers serving these mountainous, difficult-to-reach, and lightly populated rural areas of Pennsylvania. Despite its best efforts Zito has not been able to identify a suitable substitute for provisioning these critical network facilities in the areas identified herein.

For these reasons allowing Everstream’s Application to proceed in the automatic approval process and discontinue services on June 30, 2025, is contrary to the public interest and would have an adverse effect on the public convenience and necessity because there are no reasonably available substitutes from another carrier. Therefore, the Commission should deny Everstream’s Application to discontinue service in order to protect public safety communications in Pennsylvania and to prevent Zito and its customers from experiencing service disruptions.

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<sup>21</sup> See generally, *Reliability NOI* at para. 1 (explaining that the National Broadband Plan identified inadequacy of backup power and insufficient communications backhaul as key factors that contribute to the congestion or failure of commercial wireless data networks, particularly during emergencies such as large-scale natural and man-made disasters).

#### **IV. Conclusion**

For the foregoing reasons, Zito respectfully requests that the Commission deny Everstream's Application to discontinue communications services in Pennsylvania.

Respectfully submitted,

*//s// K.C. Halm*

K.C. Halm

Kasey McGee

**Davis Wright Tremaine LLP**

1301 K Street NW

Suite 500 East

Washington, D.C. 20005

(202) 973-4287

[KCHalm@dwt.com](mailto:KCHalm@dwt.com)

[KaseyMcGee@dwt.com](mailto:KaseyMcGee@dwt.com)

*Counsel for Zito Media Communications, LLC*

March 20, 2025

**EXHIBIT A**

**REDACTED**  
CONFIDENTIAL MATERIAL FILED UNDER SEAL

**EXHIBIT B**

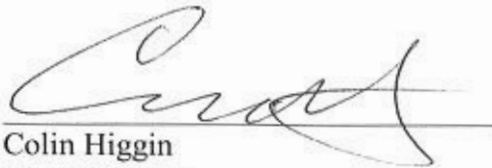
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**DECLARATION OF COLIN HIGGIN**

I, Colin Higgin, hereby declare that the facts set forth in the Zito Opposition to Everstream FCC Discontinuance Application, as filed in the above-referenced dockets, are true and correct to the best of my knowledge, information and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of March 2025.

A handwritten signature in black ink, appearing to read 'Colin Higgin', written over a horizontal line.

Colin Higgin  
Vice President  
Zito Meda Communications, LLC

## CERTIFICATE OF SERVICE

I, Kasey McGee, certify that I served a copy of the foregoing Zito Media Communications, LLC Opposition to Everstream Solutions LLC's Application for Discontinuance of Service, on March 20, 2025 via ECFS and as follows:

***Via Email***

Russell M. Blau  
Danielle Burt  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Ave, N.W.  
Washington, DC 20004-2541  
russell.blau@morganlewis.com  
danielle.burt@morganlewis.com

Catherine G. Vasudevan  
Morgan, Lewis & Bockius LLP  
2222 Market St.  
Philadelphia, PA 19103-2921  
catherine.vasudevan@morganlewis.com

***Via US Mail***

Everstream Solutions LLC  
Attn: Legal Department  
1228 Euclid Ave.  
Suite 250  
Cleveland, OH 44115



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Kasey McGee

## Submit a Standard Filing

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**Attorney/Author/Submitter Name(s):** K.C. Halm  
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Washington, DC 20554

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[ASL Video Call: 1-844-432-2275](tel:1-844-432-2275)  
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