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January 6, 2021

Via Hand Delivery

Mr. Brandon Frey, Executive Secretary Louisiana Public Service Commission 602 North 5th Street Galvez Building, 12th Floor Baton Rouge, LA 70802 LA PUBLIC SERVICE COMMISSION

Re:

Conexon Connect LLC, Ex Parte; Application for a Certificate of Authority to Operate as an Interconnected Voice over Internet Protocol Provider Statewide; Petition for Designation as an Eligible

Telecommunications Carrier

Dear Secretary Frey:

Enclosed for filing, please find an original and six copies of the Application of Conexon Connect LLC for a Certificate of Authority to Operate as an Interconnected Voice over Internet Protocol Provider Statewide in Louisiana.

Concurrently with this filing, Conexon Connect is also filing a Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934.

As indicated in the filings, Conexon Connect was allocated Rural Digital Opportunity Fund ("RDOF") Phase I support as a winner in the FCC's RDOF Phase I Auction 904. Accordingly, Conexon Connect intends on deploying and operating a new state-of-the-art, low-latency, fiber-to-the-home ("FTTH") network and to provide high-speed broadband Internet access and Voice over Internet Protocol ("VoIP") services throughout the RDOF Phase I-eligible census blocks within which it was awarded support.

Please note that Conexon Connect will commence services upon deployment of the FTTH network. Conexon Connect has indicated an Issue Date of January 6, 2021 for its TSP Tariff, and will make a supplemental filing with the Tariff Effective Date in the future upon Conexon Connect reaching the commercial operation date for the network.

Please acknowledge receipt of this filing by date-stamping the extra copy of the application.

Gordon D. Polozola T. Bull DATE DEPT. DEPT. DEPT.

Enclosure

T 225.387.0999 | F 225.388.9133 Il City Plaza | 400 Convention Street Suite 700 | Baton Rouge, LA 70802 Post Office Box 3513 | Baton Rouge, LA 70821

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BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION

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APPLICATION

Conexon Connect LLC ("Conexon Connect" or "Applicant") respectfully requests, pursuant to the Rules of the Louisiana Public Service Commission ("Commission"), a Certificate of Authority to provide interconnected voice over Internet protocol ("VoIP") service in the State of Louisiana.

In support of this Application, Applicant states as follows:

1. Applicant's Legal Name and Address

Conexon Connect LLC 2001 Grand Blvd. Suite 700 Kansas City, Missouri 64108 Phone: (202) 789-3884

Federal Tax ID Number: 81-3044214

Louisiana Tax ID Number: 2443533-001

Applicant intends to do business under the following name: Conexon Connect LLC

2. <u>Principal Corporate Officers and Officers/Employees Responsible for Louisiana Operations</u>

The name, address and telephone numbers of Applicant's principal corporate officers, and the officer responsible for Applicant's operations in Louisiana, are as follows:

Principal Corporate Officers

Jonathan Chambers
Partner
Conexon Connect LLC
2001 Grand Blvd. Suite 700
Kansas City, Missouri 64108
Phone: (202) 789-3884

Randy Klindt Partner Conexon Connect LLC 2001 Grand Blvd. Suite 700 Kansas City, Missouri 64108

Phone: (202) 789-3884

Officers and Employees Responsible for Louisiana Operations (if different from principal corporate officers)

Terie Hannay VP, Telecommunications Services Conexon Connect LLC 2001 Grand Blvd. Suite 700 Kansas City, Missouri 64108 Phone: (202) 789-3884

3. Corporate or Partnership Information

Applicant is a Missouri Limited Liability Company with its principal place of business set forth in Item 1 above. Please see <u>Attachment A</u> for a copy of Applicant's Articles of Organization (Missouri) and Certificate of Organization issued by the Secretary of State of Missouri. Neither Applicant nor any of its affiliates currently provides regulated service in Louisiana.

4. Authority to Operate in Louisiana

A certified copy of Applicant's authorization to do business in Louisiana, issued by the Secretary of State, is attached as <u>Attachment B</u>.

5. Agent for Service of Process

Applicant's agent for service of process in the State of Louisiana is as follows:

URS Agents, LLC 3867 Plaza Tower Drive, 1st Floor Baton Rouge, LA 70816 (800) 567-4397

6. Financial Qualifications

To demonstrate its financial qualifications, Applicant submits the most recent financial statements of Conexon, LLC ("Conexon"), Applicant's parent company, as **Confidential Attachment C**. Pursuant to Rule 12.1 of the Commission's Rules of Practice and Procedure, this information is trade secret, proprietary and/or confidential information, and not necessary to be disclosed to the public, and thus, shall be kept confidential and shall be exempt from public disclosure. Applicant is a privately held company and its financial information is non-public information.

7. Managerial and Technical Qualifications

Applicant is a wholly-owned subsidiary of Conexon. Conexon, which manages more rural fiber construction in the United States than any other company, works with rural electric cooperatives to bring FTTH to rural communities across the country. Conexon's goal is to ensure that rural homes and businesses have access to the life- and community-changing benefits fiber-optic networks deliver. Conexon has assisted nearly 200 rural electric cooperatives – 50 of which are deploying fiber networks – and helped connect more than 150,000 FTTH subscribers across the country.

Conexon debuted on the Inc. 500 listing of America's fastest-growing private companies in 2020, with three-year revenue growth of over 1,400%. The company ranked No. 9 within the telecommunications industry and No. 325 overall.

Please see Attachment D, which lists each principal officer and their relevant

experience.

8. Description of Proposed Services

Applicant plans to offer low-latency broadband service at speeds of at least 1 Gigabit per

second downstream and 500 Mbps upstream and offer at least 2 terabytes of monthly usage.

Petitioner will also provide its customers with voice grade access to the Public Switched

Telephone Network through its provision of interconnected VoIP service. Applicant will offer

service in all areas where it has been allocated Rural Digital Opportunity Fund ("RDOF") Phase

I support as a winner in the Federal Communications Commission RDOF Phase I auction, as

well as additional areas in Louisiana. Applicant seeks statewide authority to and will offer voice

grade access to the PSTN on a statewide basis where necessary equipment is available.

Attachment E is a map of Applicant's initial proposed service area for broadband and eligible

telecommunications carrier services, for which Applicant has concurrently filed a petition.

9. Customer Relations, Repair, and Maintenance Information

Prior to commencing service, Applicant will provide the Commission with the names and

direct telephone numbers of three company representatives that Commission staff may directly

contact during normal business hours.

The name and address for the Louisiana contact person responsible for and

knowledgeable about the Applicant's operations is as follows:

Terie Hannay

VP, Telecommunications Services

Conexon Connect LLC

2001 Grand Blvd. Suite 700

Kansas City, Missouri 64108

Phone: (202) 789-3884

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10. Other States

Attachment F provides a list of other states where Applicant has applied to operate as a telecommunications service provider and/or to offer telecommunications service and a list of other states where the Applicant is authorized to operate. No state has denied any requested authority filed by Applicant.

11. <u>Illustrative Tariff</u>

An illustrative tariff in compliance with the requirements in Section 401 of the Commission's Regulations is attached as <u>Attachment G</u>. Applicant will be constructing a fiber optic network over which to provide broadband and VoIP services. Therefore, Applicant will provide notice to the Commission once the necessary network is complete and will provide any necessary revisions and an Effective Date for the illustrative tariff at that time.

12. Public Interest

Applicant submits that grant of authority to operate as an interconnected VoIP provider will serve the public interest by creating greater competition in the marketplace, and expanding VoIP service offerings in Louisiana, thus providing consumers with additional choice.

Applicant's entry into the market will add diversity of supply, innovative service offerings, and competitive prices.

13. Reporting Requirements

Applicant will file with the Commission annual financial reports and any other reports that are required to be filed by interconnected VoIP providers.

14. Representative Contact Information

Correspondence regarding this Application should be directed to:

Gordon D. Polozola Kean Miller LLP 400 Convention Street, Suite 700 Baton Rouge, LA 70802 Phone: 225-389-3729

E-mail: gordon.polozola@keanmiller.com

With a copy to:

Todd B. Lantor Lukas, LaFuria, Gutierrez & Sachs, LLP 8300 Greensboro Drive, Suite 1200 Tysons, VA 22102

Phone: (703) 584-8671 E-mail: tlantor@fcclaw.com

Correspondence regarding the Applicant's ongoing regulatory compliance should be

directed to:

Terie Hannay VP, Telecommunications Services Conexon Connect LLC 2001 Grand Blvd. Suite 700 Kansas City, Missouri 64108 Phone: (202) 789-3884

E-mail: terie.hannay@conexon.us

CONCLUSION

For the reasons set forth above, Applicant respectfully requests that the Commission grant it a certificate of authority authorizing Applicant to provide interconnected VoIP services throughout Applicant's proposed ETC designated service area.

Respectfully submitted,

Katherine W. King Gordon D. Polozola Carrie Tournillon Kean Miller LLP

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Counsel to Conexon Connect, LLC

Dated: January 6, 2021