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November 23, 2020

Via Overnight Delivery

Louisiana Public Service Commission
Galvez Building
602 North Fifth Street
Baton Rouge, LA 70821-9154

RECEIVED

NOV 25 2020

LA Public Service Commission

**RE: TRITON NETWORKS, LLC - APPLICATION AND REQUEST FOR
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR VOIP, IXC
AND CLEC AUTHORITY IN THE STATE OF LOUISIANA**

Dear Commission:

This submission contains an Application for a Certificate of Public Convenience and Necessity to Provide Voice over Internet Protocol (VoIP), Interexchange and Local Exchange Telecommunication Services throughout the State of Louisiana as filed on behalf of Triton Networks, LLC.

An original and five (5) copies of this filing have been sent by overnight courier to your attention. A check in the amount of \$250.00 for filing fees is enclosed.

Please note I have enclosed a duplicate copy of this cover letter along with a date stamped envelope. If you could please sign and return the extra copy of this cover letter and return it in the self-addressed stamp envelope provided that would be greatly appreciated.

Additionally, please note as marked Exhibit C as Applicant's Confidential Financial Information. We request that this information as marked confidential for this Exhibit be filed under seal and not disclosed in any manner to the public. The Applicant's Confidential Financial Information should only and solely be used for internal Commission purposes and not filed with the general docket.

Should you have any questions concerning this filing, please do not hesitate to contact me.

Respectfully Submitted,

Laura Garfinkel
Laura Garfinkel, Director
CLA (CliftonLarsonAllen LLP)
6250 Shiloh Rd
Alpharetta GA, 30005
Phone: 973-760-9218
Fax: 866-611-5443
Email: Laura.Garfinkel@claconnect.com
Attorney in Fact for Triton Networks, LLC

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F20-58718

BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION

IN THE MATTER OF)

TRITON NETWORKS, LLC)

APPLICATION FOR A CERTIFICATE OF)
AUTHORITY TO PROVIDE VOICE OVER)
INTERNET, INTEREXCHANGE AND)
LOCAL EXCHANGE SERVICES IN THE)
STATE OF LOUISIANA)

CASE NO. _____

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LA Public Service Commission

APPLICATION

COMES NOW, Triton Networks, LLC ("Applicant") and respectfully requests the Louisiana Public Service Commission grant a Certificate of Authority to provide competitive Local Exchange Services on a resold basis and to additionally include such authority to include Voice over Internet Protocol (VoIP) and also Interexchange Services on a resold basis.

In accordance with Section 301(F) of the Louisiana Public Services Commission's Regulations for Competition in the Local Telecommunications Market, Applicant states the following:

Section 301(E)(1). Legal name and name under which the applicant intends to do business, mailing and physical address of applicant, and telephone number where the applicant can be reached by the Commission.

The Applicant is:

Triton Networks, LLC
12655 North Central Expressway, Suite 500
Dallas, Texas 75243
Local Phone Number 214-570-0555
Toll Free: 844-570-0555
Fax: 214-570-0310
Website Address: <http://tritonnet.com>

Section 301(E)(2). The names and addresses of the applicant's principal corporate officers.

The officer responsible for the Applicant's operations is Mr. Robert House. Mr. House serves as the CEO and President of Triton Networks, LLC and is located at 2655 N Central Expressway, #500 Dallas, TX 75243.

The current physical address for the officer responsible for Applicant's operations is:

12655 N Central Expressway, Suite 500
Dallas, TX 75243

Section 301(E)(3). If different from (2) above, the names and addresses of all officers and corporate officers in Louisiana, and the names and addresses of employees responsible for Louisiana operations.

Not applicable (there are no Louisiana-specific officers).

Mr. Robert House is the person responsible for the Company's Louisiana operations, he is located at:

12655 N Central Expressway, Suite 500
Dallas, TX 75243

Section 301(E)(4). Information about the structure of the business organization, and where applicable, a copy of any articles of incorporation, partnership agreement, or by-laws of the applicant. An applicant shall also disclose all affiliate entities offering and/or providing telecommunications services in Louisiana.

Triton Networks, LLC is a Limited Liability Company formed under the laws of Texas with all such represented formation documents and information included as **Exhibit A.**

The Applicant has been in business for over 14 years providing unique telecommunications products and services to business customers on a nationwide basis.

The company designs powerful, flexible, secure, and highly scalable voice, data, Internet and integrated communication services for businesses nationwide. Additionally, they are able to bundle products and services of multiple Trusted Carriers increasing their ability to solve business problems.

Triton Networks, LLC helps businesses and organizations nationwide leverage critical changes in telecommunication technology to increase productivity, reduce operating

costs, and protect the bottom line. Triton Networks offers, scalable and innovative solutions when it comes to Voice, Data, Networking and Cloud Solutions designed specifically for a customer's industry and customized for their business.

As a Competitive Local Exchange Carrier (CLEC) in multiple states Triton Networks LLC bundles and resells the products and services of Tier 1 and Tier 2 Carriers, using a combination of their own facilitates and predominantly the underlying service provider all while offering the business customer competitive prices. Triton Networks, LLC recommends service providers to various business customers based on service type, diversity, price and geography. Triton Networks, LLC then consolidates the solutions on a single customized bill and presents the invoice via a secure Internet billing system. Some of these carriers include AT&T, CenturyLink, Level 3, Bandwidth.com, Verizon and other carriers which support the delivery of services provided by Applicant using their underlying facilitates and/or in conjunction with the Applicant's network infrastructure. Applicant has no direct Affiliated entities which that are sometimes designated as wholly owned subsidiaries or other companies that are separate but hold some sort of common affiliation or ownership with another entity.

Headquartered in Dallas Texas, the Triton Networks, LLC team is comprised of telecom veterans with broad industry experience designing and deploying Smart Solutions for companies with a single location or organizations with a regional or national footprint that drive business value and keep productivity moving.

Section 301(E)(5). A certified copy of the applicant's authorization to do business in Louisiana issued by the Secretary of State.

A copy of Applicant's authorization to do business in Louisiana is attached hereto as

Exhibit B.

Section(E)(6). The name, address and telephone number of the Applicant's agent for service of process is:

Cogency Global, Inc.
3867 Plaza Tower Drive, 1st Floor
Baton Rouge, Louisiana 70816
Phone: 800-221-0102
Fax: 800-944-6607

Section 301(E)(7). Documentation demonstrating managerial, financial and technical abilities, including but not limited to the following:

Applicant has the managerial, technical and leadership capabilities to provide the telecommunications services for which it seeks authority under this application. The Applicant has a well grounded and well rounded management and technical team who have been long term employees of the Applicant. Management and leadership foster innovation, creativity and collaboration amongst not only themselves but also the employee base.

Management and technical biographies of key personnel are included in the submission with the original filing as an exhibit.

(a) To demonstrate the financial ability, each applicant shall provide a copy of its most recent stockholders annual report and its most recent SEC 10K, or, if the applicant is not publically traded, its most recent financial statements. If the applicant does not have separate financial reports, it may submit applicable financial statements of an affiliate with explanation to demonstrate the financial ability of applicant.

Applicant is financially qualified to provide the telecommunications services for which it seeks the authority requested in this Application attached as **Exhibit C.** Applicant is providing 2018, 2019 financial statements represented as Income Statement and Balance Sheet per each calendar year to demonstrate Applicant's financial wherewithal. Applicant requests that these financials provided be kept strictly confidential and to be used for internal Commission use only. In the event the Commission was to make these financial statements available to the public it would cause due harm to Applicant. Therefore Applicant requests that these financials be treated as Confidential and filed under seal.

(b) To demonstrate managerial ability, each applicant shall attach a brief

description of its history providing telecommunications services and shall list the geographic areas in which is has been and is currently providing telecommunications services. Newly created applicants shall list the experience of each principal officer in order to show its ability to provide service.

Applicant has the managerial, technical, administrative and operational qualifications necessary to provide the proposed services throughout the state of Louisiana as its proposed service territory. As noted above, Applicant operates a national communications company which provides multiple communications products and services. The Applicant is currently providing service as a registered CLEC, VoIP Provider and/or both (where and as required by Commission regulations) as registered entity with the proper Secretary of State in the states of: Alabama (VoIP), California (CLEC), Florida (CLEC), Illinois (CLEC), Kansas (CLEC), New Jersey (CLEC), New York (CLEC), North Carolina (VoIP), Texas (CLEC), Tennessee (VoIP) and Washington State (CLEC). Applicant is in full compliance with each state Commission as appropriate where registrations require such state Commission compliance.

The Applicant currently has no other CCN and/or applications pending in any other state with any other Public Service or Public Utility Commission at this time. However because the Company is a going concern and as the business grows, the Company will seek to file appropriate commission certifications on a state by state (case by case) basis.

The Applicant has never had a request for authorization denied by any commission.

The Applicant has never had authorization revoked in any state by any commission.

Set forth in **Exhibit D** are resumes of key management personnel who are responsible for the Applicant's operations. These resumes highlight management's extensive and long historical background in the telecommunications industry. The management team members and leadership team have extensive years of telecommunications expertise. Applicant thereby demonstrates that it possesses significant managerial and technical experience and expertise along with all qualifications necessary to operate a competitive telecommunications company in Louisiana,

which is fully consistent with the Commission's requirement. In fact Applicant exceeds Commission requirements and proudly stands ready to serve the needs of business class customers throughout the state.

(c) Technical Ability shall be indicated by description of the applicant's experience in providing telecommunications services or in the case of newly created companies, the applicant may provide other documentation which supports its technical ability.

For descriptions of Applicant's technical ability, please note aforementioned **Exhibit D.**

Section 301(E)(8). A description of the services to be offered, the proposed exact geographic areas in which the services shall be offered and map thereof.

Applicant intends to offer a wide array of telecommunications products and services on a resold basis throughout the state of Louisiana as noted in **Exhibit E** as Applicant's representative coverage map. Applicant shall provide services to business customers only and will not offer residential services of any kind. Applicant proposes to provide resold Local Exchange, Interexchange and VoIP services to business class customers throughout the state of Louisiana. Specifically, the Applicant wishes to provide business class subscribers also with hosted IPPBX communications systems provisioned over VoIP technology. The hosted IPPBX phone systems that Applicant wishes to offer can interface with Cable Modem, ATA, Router, Ethernet, MPLS, Point to Point, Private Line and other forms of delivery which the Applicant will make available to business customers.

As demonstrated in **Exhibit E** the Applicant proposes to incorporate by reference all services areas of the Incumbent Local Exchange Carriers and its underlying carriers where competition has been approved by the Commission. Further the applicant shall also include with its service offerings access to emergency services, operator services, directory assistance, interexchange service and other ancillary features that Applicant must provide pursuant to applicant statutes and regulations. Applicant intends to rely upon the facilities and network equipment deployed by its underlying

carriers as the Incumbent Local Exchange Carriers, Applicants designated additional underlying providers in conjunction with Applicants network infrastructure.

Applicant will also provide on a resold basis Plain Old Telephone Lines (POTS), direct private line, data private line and Point to Point Service.

Applicant attests that it shall comply with all applicable rules and regulations of the Commission related to service areas.

Section 301(E)(9). Key contact information regarding the Applicant's operations without limitation include the Repair and Maintenance information; the name, address and telephone number of a Louisiana contact person responsible for and knowledgeable about the applicant's operations are provided below.

Financial/Annual Reports

Name: Charles Bridges
Official Title: Controller
Direct Telephone Number: 214-570-0555
FAX Number: 877-874-1595
Email: cbridges@tritonnet.com

Tariff/Regulatory

Name: Danielle Heard
Official Title: Senior AP Specialist
Direct Telephone Number: 214-570-0555
FAX Number: 214-570-0310
Email: dheard@tritonnet.com

with copy to:

Company Name: CLA (CliftonLarsonAllen LLP)
Name: Laura Garfinkel
Official Title: Director
Direct Telephone Number: 973-760-9218
FAX Number: 866-611-5443
Email: Laura.Garfinkel@claconnect.com

The names and address of the managing partner of Triton Networks, LLC is as follows:

Mr. Robert House
12655 North Central Expressway, Suite 500
Dallas, Texas 75243
Phone: 214-570-0555
Fax: 214-570-0310
Email: rhouse@tritonnet.com

The name and address of the senior management personnel responsible for Louisiana operations of Triton Networks, LLC is as follows:

Customer Service

Name: David Hughes
12655 North Central Expressway, Suite 500
Dallas Texas 75243
Phone: 214-570-0555
Fax: 214-570-0310
Email: dhughes@tritonnet.com

Repair, Maintenance & Billing

Name: Teresa House
12655 North Central Expressway, Suite 500
Dallas Texas 75243
Phone: 214-570-0555
Fax: 214-570-0310
Email: thouse@tritonnet.com

Section 301(E)(10). A list of other states where the applicant has applied to operate as a telecommunications service provider and/or to offer telecommunications services, a list of other states where the applicant is authorized to operate, and a list of those states which have denied any requested authority.

No states have denied the Applicant authority to operate as a telecommunications carrier and/or provider in any state with which the Applicant had previously filed requests for approval for any authority. Attached as **Exhibit F** represent Applicant's jurisdictional operations in other states along with historical information as when service was first provided within each respective state.

Section 301(E)(11). Illustrative, proposed tariffs in compliance with the requirements set forth in Section 301.

Exhibits G Represents the Applicant's proposed Local Exchange, Interexchange and VoIP that will be filed with the Commission upon approval of this application and/or at anytime the Commission requests.

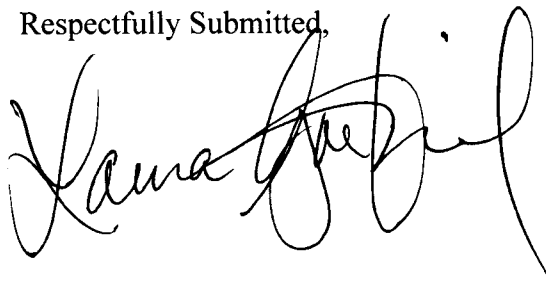
CONCLUSION

Applicant's entry into the telecommunications market will enhance competition in the provision of telecommunications services which will serve to benefit Louisiana business customers who are seeking premier telecommunications services offerings while Applicant remains at all times

in compliance with the rules, guidelines and regulations as set forth by the Louisiana Public Service Commission. By submission of this Applicant and its Exhibits, along with providing confidential financial information, Applicant has proven to the Commission that it can support all of its service offerings and is financially, technically and fully qualified in every respect to provide all stated services throughout Louisiana to serve the greater good of the public.

WHEREFORE, Triton Networks, LLC respectfully requests that the Commission grant this Application and provide its approval

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Laura Garfinkel", with a large, stylized flourish extending from the end of the name.

Laura Garfinkel, Director
CLA (CliftonLarsonAllen LLP)
6250 Shiloh Rd
Alpharetta GA, 30005
Phone: 973-760-9218
Fax: 866-611-5443
Email: Laura.Garfinkel@claconnect.com
Attorney in Fact for Triton Networks, LLC

Dated: November 23, 2020

VERIFICATION

STATE OF TEXAS

COUNTY OF Dallas

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I, Robert House, do hereby state that as Managing Member of Triton Networks, LLC, and Applicant for a Certificate of Authority from the Louisiana Public Service Commission and have authority to bind Triton Networks, LLC and hereby affirm that:

1. This application and its Exhibits to provide resold Local Exchange and Interexchange telecommunications Services throughout the state of Louisiana represents fully the Triton Networks, LLC operations, offerings and the Company in a full, true and complete fashion

2. Triton Networks, LLC confirms that information contained in the application is true and correct; and,

3. Triton Networks, LLC is familiar with, and; will comply with all Federal and State laws, and Triton Networks, LLC will comply with all Rules and Orders of the Louisiana Public Service Commission.

Subscribed and affirmed before me this 27th
day of October 2020

Seal: Danielle M Heard

Robert House
Print Name

[Signature]
Sign Name

Notary Public: My Commission expires:

10/27/2020
Date

