

MEMORANDUM

TO: Aron Hager
Vitcom LLC
Aron@vitcom.net

FROM: Robbin Russell
Public Utilities Commission of Ohio
Robbin.russell@puco..ohio.gov

RE: In the Matter of the Application of Vitcom LLC to Apply for
Certification
Case No. 17-1989-TP-ACE; 90-9430-TP-TRF
Tariff Revisions Data Request

DATE: September 27, 2017

DUE: October 5, 2017

After careful review of the Vitcom LLC application, filed September 15 and 20, 2017, a few issues need to be addressed before approval can be completed. The issues are as follows:

1. Please file the following exhibits:
 - Carrier-to-carrier access tariff;
 - Copy of letter sent to Ohio Department of Taxation stating the company intends to operate as a public utility in the state;
 - Ohio Secretary of State Certificate of Good Standing(
<https://www.sos.state.oh.us/businesses/business-reports/>);
 - List of names, addresses and phone numbers of officers and directors or partners;
 - Documentation indicating corporate structure and ownership;
 - Notarized affidavit accompanied by bona fide letters requesting interconnection; and
 - List of Ohio exchanges the applicant intends to serve
(<http://www.puco.ohio.gov/puco-forms/competitive-local-exchange-company-clec-exchange-listing-form/#sthash.tnvQ9R2x.dpbs>).
2. Exhibit B – The exhibits in this section contain contradictory statements as to what services the Company intends to offer. Is the Company proposing to offer transport/access & backhaul services or local exchange & long distance services? Please clarify and correct.
3. Exhibit D – The financial documentation was filed on September 20, 2017, the Company is seeking confidential treatment of these documents, the

10/2/2017

Company needs to request that the document be removed from the Docketing Information System (DIS) and file a Motion for a Protective Order.

4. Exhibit D – Please file a current Declaration of Support. The Declaration filed with this application has a date of March 3, 2015.

This case is scheduled to go automatic on October 15, 2017; therefore it is important to return these revisions as soon as possible to avoid suspension. Please forward the revision to me for review before docketing them.

If you have any questions, feel free to call me at (614) 466-0401 or email me at the above address.



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
08/14/2014	201422501709	REG. OF FOR. PROFIT LIM. LIAB. CO. (LFP)	125.00	0.00	0.00	0.00	0.00

Receipt

This is not a bill. Please do not remit payment.

MORDY GROSS
221 PINE ST
LAKEWOOD, NJ 08701

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, Jon Husted
2318269

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

VITCOM OHIO LLC (VITCOM LLC)

and, that said business records show the filing and recording of:

Document(s)

REG. OF FOR. PROFIT LIM. LIAB. CO.

Effective Date: 08/11/2014

Document No(s):

201422501709



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
14th day of August, A.D. 2014.

Jon Husted

Ohio Secretary of State

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EXHIBIT B

Description of Services

Applicant will be providing services only on a wholesale basis to other telecommunications providers. Applicant has no current plans to offer or provide any dial-tone services or to provide any services to residential or business end users.

Journal of Management Education 30(6)p. 789-804
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[illegible]

1. *Chlorophyll a* and *Chlorophyll b* were determined by the method of Lichtenthaler and Whistler (1973).

B-1 How Service is Provisioned

VITCOM will initially operate in Ohio as a wholesale carrier offering transport services to other providers. To support these services, VITCOM is currently constructing a nation-wide network, which includes a core structure of transport circuits connected to high-capacity soft switches and media gateways in carrier hotels in New York.

1. Location and description of facilities used to serve Ohio customers

VITCOM will receive and send traffic for Ohio customers from providers and will route that traffic to its switch and media gateway located in New York. VITCOM will utilize high capacity trunks between ILEC and VITCOM as well as obtaining backhaul facilities from other carriers to connect to ILEC access tandems or other points of interconnection in order to route traffic to and from Ohio end users of VITCOM's carrier customers. VITCOM will monitor its network serving customers in Ohio from a network operation center.

2. Description of plans to build, locate, acquire or expand facilities in Ohio

VITCOM initially will purchase or lease network facilities from the ILEC or other carriers in Ohio, so it does not anticipate engaging in any construction for its initial network deployment. If VITCOM anticipates the need to engage in construction of facilities at a later date, it will obtain all necessary permits and regulatory approval prior to such construction.

REPORT ON THE PROGRESS OF THE WORK

The first part of the report deals with the general situation of the country. It is a very interesting and informative account of the progress of the work. The second part of the report deals with the specific details of the work. It is a very detailed and thorough account of the work. The third part of the report deals with the results of the work. It is a very clear and concise account of the results. The fourth part of the report deals with the conclusions of the work. It is a very thoughtful and well-reasoned account of the conclusions. The fifth part of the report deals with the recommendations of the work. It is a very practical and useful account of the recommendations. The sixth part of the report deals with the summary of the work. It is a very brief and concise account of the summary. The seventh part of the report deals with the appendix. It is a very detailed and thorough account of the appendix. The eighth part of the report deals with the index. It is a very clear and concise account of the index. The ninth part of the report deals with the bibliography. It is a very detailed and thorough account of the bibliography. The tenth part of the report deals with the conclusion. It is a very thoughtful and well-reasoned account of the conclusion.

B-2 Description of Proposed Services

Vitcom proposes to provide its wholesale long distance services state-wide in Ohio, and local exchange services in AT&T, Verizon and CenturyLink territories. All services provided by Applicant will be facilities-based or resale. These facilities will use existing structures and as such will not result in any environmental damage. Services to be provided include:

Wholesale Transit Services

Wholesale Local Loop Services

IntraLATA toll voice services

InterLATA toll voice services

High capacity circuits: T-1s, DS1, DS3, OC 3, OC12, OC48, OC192

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B-3 Statement about Provision of CTS Services

VITCOM does not currently offer CTS services under separate CTS authority, and will be including those services within its CLEC filing.

B-4 Description of Proposed Market Area

VITCOM plans to provide local exchange service in all areas in Ohio currently serviced by AT&T Ohio, Cincinnati Bell, CenturyLink (formerly Embarq) and Frontier North (formerly Verizon) where customer demand arises.

B-5 Explanation of How Proposed Market Area is in the Public Interest

The Commission has determined that the public interest would be served by ensuring competition in the local exchange, intraLATA toll and interLATA markets. VITCOM proposes to compete with the incumbent LECs, other competitive local carriers, and providers of long distance services by providing high quality, fairly-priced, innovative telecommunications services. VITCOM's entry into the market will make efficient use of existing communications resources and increase diversification and reliability in the supply of communications services.

1941

1942

1943

1944

1945

B-6 Description of Class of Customers Served

VITCOM intends to provide wholesale local exchange and interexchange services to other telecommunications providers in the state of Ohio.

EXHIBIT C

Business Requirements

C-1 Certification registration from Ohio Secretary of State

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E-1 Technical and Managerial Expertise

The management team of VITCOM has extensive experience in providing telecommunications services and has, by its successful operation in other states, demonstrated its ability to provide high-quality, reliable and reasonably-priced services.

THE UNIVERSITY OF CHICAGO

DEPARTMENT OF THE HISTORY OF ARTS

RECEIVED FROM THE UNIVERSITY OF CHICAGO

LIBRARY OF THE UNIVERSITY OF CHICAGO

Zalmen Ashkenazi

Zalmen@vitcom.net

President,

- Industry recognized professional with 22 years of experience in telecommunications focusing on revenue assurance, cost optimization and profitability.
- Respected leader of technical teams, back office operations and corporate communications departments. Design and orchestrate network deployment that effectively promotes product growth and profitability.
- Expert in the technical, conceptual and content development of network planning. Proven ability to drive and deliver planned deployment of network interconnects.

Skills

- | | |
|---------------------------------|---|
| • Network Planning and forecast | • New Product Planning & execution |
| • Creative Team Leadership | • Technical Development of Training Materials |
| • Contract Negotiations | • Cost audit and analysis |
| • Best cost routing | |
-

Recent Accomplishments

Planed & Deployed Nationwide VoIP platform for Transit network 2009-2013
Planed & Deployed New York Interconnect Network with Verizon, 2005 - 2010
Planed & deployed Transition from TDM to VoIP for SMB and enterprise, 2002-2005

Professional Experience

Tandem Transit LLC- Brooklyn, NY

CTO , 11/2009 to 12/2013

Directly responsible for defining and executing detailed regular cost and performance analysis and recommendation along the optimization process chain, the functional service units and vendor types.

Selected Accomplishments:

- Identified the network frameworks and requirements, defined and aligned requirements with the corporate efforts and oversaw the system related realization and implementation. Responsible for forecast, negotiation and deployment of Interconnect Networks with other Tandem carriers to establish a facility-based network.
- Deployed a full redundant VoIP network to operate as a TANDEM nationwide.
- Proactively drove the improvement of efficiency and effectiveness of internal provisioning process to deliver timely and fulfill customers' expectation.
- Leveraged strengths in cost-effective network re-design and vendor negotiations to end each year an average of 15% under-budget (without compromising business growth goals). Work directly with finance for monthly Cost of Goods Sold & Margin reporting.

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 3, 1862. It is a very long letter, and it contains a great deal of information about the state of the country at that time. The President talks about the war with Mexico, and about the situation in the South. He also talks about the economy, and about the need for more money. The letter is written in a very formal style, and it is very long. It is a very important document, and it is one of the most important documents in the history of the United States.

2. The second part of the document is a letter from the Secretary of the Treasury to the President, dated January 3, 1862. It is a very short letter, and it contains a great deal of information about the state of the Treasury. The Secretary talks about the need for more money, and about the need for more bonds. He also talks about the need for more gold, and about the need for more silver. The letter is written in a very formal style, and it is very short. It is a very important document, and it is one of the most important documents in the history of the United States.

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XCHANGE TELECOM CORP - Brooklyn, NY

Vice President, Network Operations, 9/2005 to 11/2009

Developed and implemented plans for UNE-L and CLEC facilities based, for cost reductions, revenue assurance and profitability.

- Audited and groomed voice network to optimize and cut cost by approximately 40%.
- Implemented best cost routing for quality and cost reduction.
- Implemented process and policy surrounding pricing. Responsible for all tariff filings.
- Responsible for all products margin reporting to demonstrate profitability of the various business units. Provided guidance to maximize profitability.
- Build and developed the migration for resale to facilities based.

Vitcom Corporation - New York, NY

CEO , 6/1996 to 6/2001

Advanced through a series of promotions, primarily responsible for company's profitability through detailed product margin reporting, pricing analysis, least cost routing, network planning and contract negotiations.

- Planned and deployed First Voice Over IP network nationwide serviced through 6 switches in the United States. Responsible for least cost routing in a 14-switches fully ubiquitous network (6 in USA, 1 in Canada, 7 in Europe).
- Accountable for all audits/verification of vendor invoices including filing disputes and handling dispute resolutions & settlements.
- Provided detailed margin reporting. All Business units were held responsible for profitable contribution to the growth of the company. The monthly management margin report was an instrumental tool utilized for operations. It provided a comprehensive view of entire business operations.

Boro Tel - New York, NY

President , 2/1992 to 5/1996

Built and developed Payphone Coin operated phones, throughout the city of New York

- Managed a team of installers and repair crew of over 1000 payphones.
- Install over 1000 phones in a period of 16 months.
- Sold with great success

Technology

Software: Equinox, Routing Translation DMS250, DMS500, MetaSwitch, MS Office (Word, Access, Excel, PowerPoint), SMS/800 Database, HP-12C

Education

Untied Talmudical academy - Monroe , NY

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it sets out the President's policy for the new year. The President states that he is pleased to see the Congress assembled, and that he is confident that the country is in a good position to meet the challenges of the future.

2. The second part of the document is a report from the Secretary of the Treasury, dated January 1, 1861. It is a very important document, as it sets out the Secretary's policy for the new year. The Secretary states that he is pleased to see the Congress assembled, and that he is confident that the country is in a good position to meet the challenges of the future.

3. The third part of the document is a report from the Secretary of the Interior, dated January 1, 1861. It is a very important document, as it sets out the Secretary's policy for the new year. The Secretary states that he is pleased to see the Congress assembled, and that he is confident that the country is in a good position to meet the challenges of the future.

4. The fourth part of the document is a report from the Secretary of the War, dated January 1, 1861. It is a very important document, as it sets out the Secretary's policy for the new year. The Secretary states that he is pleased to see the Congress assembled, and that he is confident that the country is in a good position to meet the challenges of the future.

5. The fifth part of the document is a report from the Secretary of the Navy, dated January 1, 1861. It is a very important document, as it sets out the Secretary's policy for the new year. The Secretary states that he is pleased to see the Congress assembled, and that he is confident that the country is in a good position to meet the challenges of the future.

6. The sixth part of the document is a report from the Secretary of the State, dated January 1, 1861. It is a very important document, as it sets out the Secretary's policy for the new year. The Secretary states that he is pleased to see the Congress assembled, and that he is confident that the country is in a good position to meet the challenges of the future.



30 Avenida D, 14-45
Ciudad de Plata II, Zona 7
Guatemala, Guatemala

Mobil +011 (502) 2473 8903
E-mail juan@vitcom.net

Juan Carlos Quan

Objective

Senior Management Position in an Industry where I can contribute with my wide experience in sales, consulting, business development in emerging markets and profit developing strategies.

Professional experience

2013 – To date Vitcom Corp Florida

Chief Financial Officer

- Responsible for the Accounting department
- Set up Treasury, budgeting and Cash flow

2009 – To date TandemTransit LLC New York

Chief Financial Officer

- Responsible for the Accounting department
- Set up Treasury, budgeting and Cash flow

2005 – 2009 Fusion Telecom (VoIP Division) Fort Lauderdale, Florida

Regional Director Latin America, VoIP Division

- Developed and manage Sales and Support channels through models of profit sharing deals, Joint Ventures and Services for Cable operators, ISPs, Private Labels, Resellers and Direct Sales.
- Created VoIP services business models for sales to Ex Pats, Residential, SoHo, Corporate, Call shops, With solutions from Softphones, ATAs and specialized billing services.
- Implemented Call Center VoIP services with an array of solutions from Sip Trunking, Hosted IP PBX and Asterisk options among others, with specialized Call Center requirement features.
- Organized the Latin America division for Sales and Support channels
- Obtained a full Telecommunications License in the Dominican Republic

2004 – 2005 Fusion Telecom (Carrier Division) Fort Lauderdale, Florida

Manager Latin America, Business Dev. Carrier Division

- Negotiated Interconnection contracts for Central America, Mexico and Cuba
- Created a business model for corporate sales for VoIP services

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a very important document, as it sets out the policy of the new administration.

2. The second part of the document is a report from the Secretary of the Treasury, dated January 1, 1861. It contains a detailed account of the financial state of the country at the beginning of the year.

3. The third part of the document is a report from the Secretary of the Interior, dated January 1, 1861. It contains a detailed account of the state of the public lands and the progress of the various departments under his control.

4. The fourth part of the document is a report from the Secretary of the Navy, dated January 1, 1861. It contains a detailed account of the state of the navy and the progress of the various departments under his control.

5. The fifth part of the document is a report from the Secretary of the War, dated January 1, 1861. It contains a detailed account of the state of the army and the progress of the various departments under his control.

6. The sixth part of the document is a report from the Secretary of the State, dated January 1, 1861. It contains a detailed account of the state of the foreign relations of the country and the progress of the various departments under his control.

7. The seventh part of the document is a report from the Secretary of the Education, dated January 1, 1861. It contains a detailed account of the state of the public schools and the progress of the various departments under his control.

8. The eighth part of the document is a report from the Secretary of the Agriculture, dated January 1, 1861. It contains a detailed account of the state of the agriculture of the country and the progress of the various departments under his control.

2000 – 2004 Vitcom Corporation Miami, Florida

Central America and Caribbean Business Development Manager

- Negotiated Interconnection contracts in El Salvador, Guatemala, Nicaragua, Mexico and Cuba
- Negotiated, Implemented and managed POPs in El Salvador, Guatemala, Honduras, Mexico, Haiti, Jamaica, Colombia, Panama
- Personally generated sales of over US\$ 20 Million with profits of over US\$ 4 Million

1996 – 2000 Omega Group San Salvador, El Salvador

Chief Operating Officer

Holding company for Computer Sales and services stores in 3 countries

- Responsible for overall market strategy, as well as financial operations of the group.
- Responsible for international operations in Honduras, Guatemala and El Salvador
- Sales of US\$ 11 Million per year

1984 – 1996 Omega Electrónica San Salvador, El Salvador

General Manager

Company dedicated to the sale of computer hardware, software, service contracts and training.

- Founder of the company
- Created specialized divisions for Networking, Microsoft Certified Training, Government Sales, Retail and Corporate Sales Divisions (75 employees)
- Negotiated distribution for IBM, Compaq, Acer, Microsoft, Novell
- Sales of US\$ 7 Million per year

1983 – 1984 Omega Electrónica Guatemala, Guatemala

Sales Manager

- Co-founder of the company
- Responsible for sales of Personal Computers division

1982 -1983 Omega Data Center Guatemala, Guatemala

Sales Manager

- Co-Founder of the company
- Responsible for sales of Data Processing Services

Education

1978-1982 University Of Southern Mississippi Hattiesburg, MS

BS Business Administration

Dividing this into two separate lists, we would have the following:

Certificate Granted

1. Alabama
2. Florida
3. Georgia
4. Illinois
5. Indiana
6. Kansas
7. Kentucky
8. Maryland
9. Massachusetts
10. Michigan
11. Montana
12. Nebraska
13. Nevada
14. New Jersey
15. New York
16. Ohio
17. Oregon
18. Pennsylvania
19. Rhode Island
20. South Carolina
21. Texas
22. Utah
23. Vermont
24. Virginia
25. Washington
26. West Virginia
27. Wisconsin
28. Wyoming

Certificate Pending

1. Arizona
2. Arkansas
3. Colorado
4. Hawaii
5. Idaho
6. Iowa
7. Maine
8. Mississippi
9. New Hampshire
10. North Carolina

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11. Oklahoma
12. South Dakota
13. Tennessee

E-5 Verification that Vitcom will maintain local telephony records separate from other accounting records in accordance with GAAP

VITCOM hereby verifies that it will maintain local telephony records separate and apart from other accounting records in accordance with GAAP.

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 10/15/2010 BY 60322 UCBAW

EXCEPT WHERE SHOWN OTHERWISE, THIS DOCUMENT IS UNCLASSIFIED

DATE 10/15/2010 BY 60322 UCBAW

E-6 Compliance with Affiliate Transaction Requirements

VITCOM hereby verifies that it will comply with any affiliate transaction requirements.

EXHIBIT F

Documentation Attesting to Proposed Interactions with Carriers

The Company plans on offering services in all ILEC territories in Ohio as needed by potential customers and will submit requests for interconnection to each of the ILECs in Ohio within 30 days of receiving approval from the PUCO.

F-1 Rate Derivation

VITCOM will derive its rates from interconnection agreements, wholesale agreements, resale and other tariffs, and analysis of the costs of its own facilities.

1. The first part of the report is a summary of the work done during the year.

2. The second part is a detailed account of the work done during the year.

F-2 Explanation of Service Areas with Approved Interconnection or Resale Agreement

VITCOM is in the process of seeking interconnection agreements with AT&T Ohio, Cincinnati Bell, CenturyLink Ohio (formerly Embarq) and Frontier (formerly Verizon), and will begin providing service as soon as practicable after interconnection.

VITCOM intends to simply adopt interconnection agreements already in place between these ILECs and other LECs.

VITCOM has no plans to construct facilities, but will utilize facilities of ILECs and other CLECs as needed.

EXHIBIT G

Documentation Attesting to Proposed Interactions with Customers

G-1 Statement Regarding No Advance Payment for Dial Tone

VITCOM does not intend to provide local services which require a customer to pay in advance of receiving dial tone.

G-2 Sample Bill and Disconnection Notice

VITCOM will not be providing residential service so disconnection notice is being submitted.

G-3 Customer Application to Establish Residential Service

Not applicable. VITCOM does not intend to offer residential service.

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G-4 Mirroring Statement

VITCOM will mirror the entire ILEC exchanges for both serving area and local calling areas.

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Public Utilities Commission of Ohio
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RE: In the Matter of the Application of Vitcom LLC to Apply for
Certification
Case No. 17-1989-TP-ACE; 90-9430-TP-TRF
Tariff Revisions Data Request

DATE: September 27, 2017

DUE: October 5, 2017

After careful review of the Vitcom LLC application, filed September 15 and 20, 2017, a few issues need to be addressed before approval can be completed. The issues are as follows:

1. Please file the following exhibits:
 - Carrier-to-carrier access tariff;
 - Copy of letter sent to Ohio Department of Taxation stating the company intends to operate as a public utility in the state;
 - Ohio Secretary of State Certificate of Good Standing(
<https://www.sos.state.oh.us/businesses/business-reports/>);
 - List of names, addresses and phone numbers of officers and directors or partners;
 - Documentation indicating corporate structure and ownership;
 - Notarized affidavit accompanied by bona fide letters requesting interconnection; and
 - List of Ohio exchanges the applicant intends to serve
(<http://www.puco.ohio.gov/puco-forms/competitive-local-exchange-company-clec-exchange-listing-form/#sthash.tnvQ9R2x.dpbs>).
2. **Exhibit B** – The exhibits in this section contain contradictory statements as to what services the Company intends to offer. Is the Company proposing to offer transport/access & backhaul services or local exchange & long distance services? Please clarify and correct.
3. **Exhibit D** – The financial documentation was filed on September 20, 2017, the Company is seeking confidential treatment of these documents, the

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Company needs to request that the document be removed from the Docketing Information System (DIS) and file a Motion for a Protective Order.

4. Exhibit D – Please file a current Declaration of Support. The Declaration filed with this application has a date of March 3, 2015.

This case is scheduled to go automatic on October 15, 2017; therefore it is important to return these revisions as soon as possible to avoid suspension. Please forward the revision to me for review before docketing them.

If you have any questions, feel free to call me at (614) 466-0401 or email me at the above address.



The exhibits in this section contain contradictory statements as to what services the Company intends to offer. Is the Company proposing to offer transport/access & backhaul services or local exchange & long distance services? Please clarify and correct.

We will provide local exchange & long distance services

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Commission of Ohio Docketing Information System on

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in

Case No(s). 17-1989-TP-ACE

Summary: Application electronically filed by Mr. Zalmen Ashkenazi on behalf of Vitcom LLC