

THE BISON JACOBSON FIRM LLC  
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June 21, 2019

VIA ELECTRONIC SUBMISSION

Director of Administration  
Public Utilities Commission of Ohio  
180 E. Broad St.  
Columbus, OH 43215-3793  
(614) 466-3016

Re: IRU Networks, LLC  
Carrier Certification – 19-1350-TP-ACE


Dear Sir/Madam:

Attached please find for filing IRU Networks, LLC's Telecommunications Filing Form, Telecommunications Supplemental Application Form for Carrier Certification, Telecommunications Retail Service Offering Form, and required exhibits.

A Motion for Protective Order is being electronically filed separately to protect the confidentiality of its financial information submitted as Exhibit H to its Application for a Certificate of Public Convenience and Necessity to Provide Resold Local and Interexchange Services in the State of Ohio.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

  
Barbara Bison Jacobson, Esq.  
Attorney for IRU Networks, LLC

Enclosures

cc: Donna Rice Costello

*The Public Utilities Commission of Ohio*  
**TELECOMMUNICATIONS FILING FORM**

(Effective: 10-11-2017)

This form is intended to be used with most types of required filings. It provides check boxes with rule references for the most common types of filings. It does not replace or supersede Commission rules in any way.

In the Matter of the Application of IRU Networks, LLC

) TRF Docket No. 90 -

) Case No. 19-1350-TP-ACE

to provide Resold Local and Interexchange Services throughout the State of Ohio

) NOTE: Unless you have reserved a Case #, leave the  
) "Case No" fields BLANK.

Name of Registrant(s) IRU Networks, LLC

DBA(s) of Registrant(s) \_\_\_\_\_

Address of Registrant(s) 3030 NW Expressway, Suite 200-328, Oklahoma City, OK 73112

Company Web Address www.irunetworks.com

Regulatory Contact Person(s) Donna Rice Costello

Phone 888-250-2111

Fax \_\_\_\_\_

Regulatory Contact Person's Email Address donna@irunetworks.com

Contact Person for Annual Report Donna Rice Costello

Phone 888-250-2111

Address (if different from above) \_\_\_\_\_

Consumer Contact Information Donna Rice Costello

Phone 888-250-2111

Address (if different from above) \_\_\_\_\_

Motion for protective order included with filing? ☒ Yes ☐ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: Waivers may toll any automatic timeframe.]

**Notes:**

Section I and II are Pursuant to Ohio Administrative Code 4901:1-6.

Section III – Carrier to Carrier is Pursuant to Ohio Adm.Code 4901:1-7, and Wireless is Pursuant to Ohio Adm.Code 4901:1-6-24.

Section IV – Attestation.

(1) Indicate the Carrier Type and the reason for submitting this form by checking the boxes below.

(2) For requirements for various applications, see the identified section of Ohio Adm.Code Chapter 4901 and/or the supplemental application form noted.

(3) Information regarding the number of copies required by the PUCO may be obtained from the PUCO's website at [www.PUCO.ohio.gov](http://www.PUCO.ohio.gov) under the docketing information system section, by calling the docketing division at 614-466-4095, or by visiting the docketing division at the offices of the PUCO.

(4) An Incumbent Local Exchange Carrier (ILEC) offering basic local exchange service (BLES) outside its traditional service area should choose CLEC designation when proposing to offer BLES outside its traditional service area or when proposing to make changes to that service.

**All filings that result in a change to one or more tariff pages require, at a minimum, the following exhibits:**

Exhibit	Description:
A	The tariff pages subject to the proposed change(s) as they exist before the change(s).
B	The tariff pages subject to the proposed change(s), reflecting the change, with the change(s) marked in the right margin.
C	A short description of the nature of the change(s), the intent of the change(s), and the customers affected.
D	A copy of the notice provided to customers, along with an affidavit that the notice was provided according to the applicable rule(s).

## Section I – Part I - Common Filings

<b>Carrier Type</b> <input type="checkbox"/> <b>Other</b> (explain below)	<b>For Profit ILEC</b>	<b>Not For Profit ILEC</b>	<b>CLEC</b>
Change terms & conditions of existing BLES	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)
Introduce non-recurring charge, surcharge, or fee to BLES			<input type="checkbox"/> ATA <u>1-6-14(H)</u> (Auto 30 days)
Introduce or Increase Late Payment	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-6-14(I)</u> (Auto 30 days)
Revisions to BLES Cap	<input type="checkbox"/> ZTA <u>1-6-14(F)</u> (0 day Notice)		
Introduce BLES or expand local service area (calling area)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-14(H)</u> (0 day Notice)
Notice of no obligation to construct facilities and provide BLES	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day Notice)	<input type="checkbox"/> ZTA <u>1-6-27(C)</u> (0 day Notice)	
Change BLES Rates	<input type="checkbox"/> TRF <u>1-6-14(F)</u> (0 day Notice)	<input type="checkbox"/> TRF <u>1-6-14(F)(4)</u> (0 day Notice)	<input type="checkbox"/> TRF <u>1-6-14(G)</u> (0 day Notice)
To obtain BLES pricing flexibility	<input type="checkbox"/> BLS <u>1-6-14(C)(1)(c)</u> (Auto 30 days)		
Change in boundary	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	<input type="checkbox"/> ACB <u>1-6-32</u> (Auto 14 days)	
Expand service operation area			<input type="checkbox"/> TRF <u>1-6-08(G)(0 day)</u>
BLES withdrawal			<input type="checkbox"/> ZTA <u>1-6-25(B)</u> (0 day Notice)
<b>Other*</b> (explain)			

## Section I – Part II – Customer Notification Offerings Pursuant to Chapter 4901:1-6-7 OAC

<b>Type of Notice</b>	<b>Direct Mail</b>	<b>Bill Insert</b>	<b>Bill Notation</b>	<b>Electronic Mail</b>
<input type="checkbox"/> 15-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> 30-day Notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Date Notice Sent:</b>				

## Section I – Part III – IOS Offerings Pursuant to Chapter 4901:1-6-22 OAC

<b>IOS</b>	<b>Introduce New</b>	<b>Tariff Change</b>	<b>Price Change</b>	<b>Withdraw</b>
<input type="checkbox"/> IOS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Section II – Part I – Carrier Certification - Pursuant to Chapter 4901:1-6-08, 09 & 10 OAC

Certification	ILEC (Out of territory)	CLEC	Telecommunications Service Provider Not Offering Local	CESTC	CETC
* See Supplemental form	<input type="checkbox"/> ACE <u>1-6-08</u> * (Auto 30- day)	<input checked="" type="checkbox"/> ACE <u>1-6-08</u> * (Auto 30 day)	<input checked="" type="checkbox"/> ACE <u>1-6-08</u> * (Auto 30 day)	<input type="checkbox"/> ACE <u>1-6-10</u> (Auto 30 day)	<input type="checkbox"/> UNC <u>1-6-09</u> * (Non-Auto)

\*Supplemental Certification forms can be found on the PUCO webpage.

## Section II – Part II – Certificate Status & Procedural

Certificate Status	ILEC	CLEC	Telecommunications Service Provider Not Offering Local
Abandon all Services		<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)	<input type="checkbox"/> ABN <u>1-6-26</u> (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ACN <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> ACO <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Merger *	<input type="checkbox"/> AMT <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> AMT <u>1-6-29(E)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATC <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> ATR <u>1-6-29(B)</u> (Auto 30 days)	<input type="checkbox"/> CIO <u>1-6-29(C)</u> (0 day Notice)

\* Other exhibits may be required under the applicable rule(s). ACN, ACO, AMT, ATC, ATR and CIO applications see the 4901:1-6-29 Filing Requirements on the PUCO's webpage for a complete list of exhibits.

## Section III – Carrier to Carrier (Pursuant to 4901:1-7), and Wireless (Pursuant to 4901:1-6-24)

Carrier to Carrier	ILEC	CLEC
Interconnection agreement, or amendment to an approved agreement	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 day)	<input type="checkbox"/> NAG <u>1-7-07</u> (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)	<input type="checkbox"/> ARB <u>1-7-09</u> (Non-Auto)
Introduce or change c-t-c service tariffs	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 days)	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 days)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC <u>1-7-04 or 05</u> (Non-Auto)	
Changes in rates, terms & conditions to Pole Attachment, Conduit Occupancy and Rights-of-Way. (13-579-AU-ORD 11/30/16 Entry)	<input type="checkbox"/> ATA <u>1-3-04</u> (Auto 60 days)	
<b>Wireless Providers</b> See <u>4901:1-6-24</u>	<input type="checkbox"/> RCC [Registration & Change in Operations] (0 day)	<input type="checkbox"/> NAG [Interconnection Agreement or Amendment] (Auto 90 days)

#### Section IV. – Attestation

Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.

#### AFFIDAVIT

#### *Compliance with Commission Rules*

I am an officer/agent of the applicant corporation, IRU Networks, LLC, and am authorized to make this statement on its behalf.  
Donna Rice Costello  
(Name)

Please check ALL that apply:

☒ I attest that these tariffs comply with all applicable rules for the State of Ohio. I understand that tariff notification filings do not imply Commission approval and that the Commission's rules, as modified and clarified from time to time, supersede any contradictory provisions in our tariff. We will fully comply with the rules of the State of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the State of Ohio.

☐ I attest that customer notices accompanying this filing form were sent to affected customers, as specified in Section II, in accordance with Ohio Adm. Code 4901:1-6-7.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on  
(Date)

June 7, 2019

at (Location)

Oklahoma City, OK

\*Signature and  
Title

X Donna Rice Costello

CFO

Date

June 7, 2019

\*This affidavit is required for every tariff-affecting filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.

#### VERIFICATION

I, , verify that I have utilized the Telecommunications Filing Form for most proceedings provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.

\*Signature and  
Title

X Donna Rice Costello

CFO

Date

June 7, 2019

\*Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.

File document electronically as directed in case number 06-900-AU-WVR

or

Send your completed Application Form, including all required attachments as well as the required number of copies, to:

Public Utilities Commission of Ohio  
Attention: Docketing Division  
180 East Broad Street, Columbus, OH 43215-3793



**The Public Utilities Commission of Ohio**  
**TELECOMMUNICATIONS SUPPLEMENTAL APPLICATION FORM**  
**for CARRIER CERTIFICATION**

(Effective: 01/20/2011)

(Pursuant to Case No. 10-1010-TP-ORD)

NOTE: This SUPPLEMENTAL form must be used WITH the  
TELECOMMUNICATIONS FILING FORM for ROUTINE PROCEEDINGS.

In the Matter of the Application of IRU Networks, LLC  
to provide Resold Local and Interexchange Services  
throughout the State of Ohio

Case No. 19-1350-TP-ACE

Name of Registrant(s) IRU Networks, LLC

DBA(s) of Registrant(s) \_\_\_\_\_

Address of Registrant(s) 3030 NW Expressway, Suite 200-328, Oklahoma City, OK 73112

Motion for protective order included with filing? ☒ Yes ☐ No

Motion for waiver(s) filed affecting this case? ☐ Yes ☒ No [Note: waiver(s) tolls any automatic timeframe]

**List of Required Exhibits**

**Tariffs: (Include all that apply)**

☐ Interexchange Tariff

☐ Local Tariff

☐ CESTC Tariff

☐ Carrier-to-Carrier (Access) Tariff

**Description of Services**

NOTE: All Facilities-Based carriers must file an Access Tariff

☒ Service provisioned via Resale

☐ Service provisioned via Facilities

☐ Both Resold and Facilities-based

☒ Description of Proposed Services

☒ Statement about the provision of  
CTS services

☒ Description of the general  
geographic area served

☒ Explanation of how the proposed  
services in the proposed market  
area are in the public interest.

☒ Description of the class of customers (e.g., residence, business) that the  
applicant intends to serve

**Business Requirements**

**Evidence of Registration with:**

☒ Ohio Department of Taxation

☒ Ohio Secretary of State<sup>1</sup> &  
Certificate of Good Standing

**Documentation attesting to the applicant's financial viability, including the following:**

☒ An executive Summary describing the applicant's current financial condition, liquidity, and capital resources. Describe internally generated sources of cash and external funds available to support the applicant's operations that are the subject of this certification application.

☒ Copy of financial statements (actual and pro forma income statement and a balance sheet). Indicate if financial statements are based on a certain geographical area(s) or information in other jurisdictions

☒ Documentation to support the applicant's cash and funding sources.

**Documentation attesting to the applicant's managerial ability and corporate structure, including the following:**

☒ Documentation attesting to the applicant's technical and managerial expertise relative to the proposed service offering(s) and proposed service area

☒ List of names, addresses, and phone numbers of officers and directors, or partners.

☒ Documentation indicating the applicant's corporate structure and ownership

☒ Information regarding any similar operations in other states.

If this company has been previously certified in the State of Ohio, include that certification number \_\_\_\_\_

☒ Verification that the applicant will follow federal communications commission (FCC) accounting requirements, if applicable.

<sup>1</sup> Certification from Ohio Secretary of State (domestic or foreign corporation, authorized use of fictitious name, etc.), and Certificate of Good Standing is required.

**Documentation attesting to the applicant's proposed interactions with other Carriers**

- ☐ Explanation as to whether rates are derived through (check all applicable):  
☐ interconnection agreement ☐ retail tariffs ☐ resale tariffs
- ☐ Explanation as to which service areas company currently has an approved interconnection or resale agreement.
- ☐ A notarized affidavit accompanied by bona fide letters requesting negotiation pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and a proposed timeline for construction, interconnection, and offering of services to end users.

**Documentation attesting to the applicant's proposed interactions with Customers**

- ☐ A sample copy of the customer bill and disconnection notice the applicant plans to utilize.
- ☐ Provide a copy of any customer application form required in order to establish residential service, if applicable.
- ☐ For CLECs, List of Ohio ILEC Exchanges the applicant intends to serve  
(Use spreadsheet from: [http://www.puc.state.oh.us/puco/forms/form.cfm?doc\\_id=357](http://www.puc.state.oh.us/puco/forms/form.cfm?doc_id=357))
- ☐ If Mirroring the entire ILEC local service areas, tariffs may incorporate by reference. If not mirroring the entire ILEC local exchange areas, the CLEC shall specifically define its local service areas in the tariff.

**Affidavit**

I am an authorized representative of the applicant corporation IRU Networks, LLC  
(Name)

and I am authorized to make this statement on its behalf. I attest that I have utilized the Telecommunications Supplemental Application Form for Carrier Certification provided by the Commission, and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct.

Executed on June 7, 2019  
[Signature] CFO  
(Signature and Title)

at Oklahoma City, OK  
June 7, 2019  
(Date)

*The Public Utilities Commission of Ohio*  
**TELECOMMUNICATIONS RETAIL SERVICE OFFERING FORM**  
**For Non-BLES Carriers**

Per the Commission's 01/19/2011 "Implementation Order" in Case No. 10-1010-TP-ORD  
(Effective: 01/20/2011)

Company Name IRU Networks, LLC

Company Address 3030 NW Expressway, Ste. 200-328, Oklahoma City, Oklahoma 73112

Company Web Address www.irunetworks.com

Regulatory Contact Person Donna Rice Costello, Phone (888) 250-2111 Fax

Regulatory Contact Person's Email Address accounting@irunetworks.com

Contact Person for Annual Report Donna Ricc Costello Phone (888) 250-2111 Fax

Consumer Contact Information Brent West Phone (888) 250-2111 Fax

TRF Docket No. \_\_\_\_\_ - \_\_\_\_\_ -TP-TRF

**I. Company Type (Check all applicable):**

☒ Non-BLES CLEC                      ☒ IXC                      ☐ Other (explain) \_\_\_\_\_

**II. Services offered (Check all applicable):**

- ☒ Toll services (intrastate)  
☒ Local Exchange Service (i.e., residential or business bundles)  
☐ Other (explain) \_\_\_\_\_

**III. Tariffed Provisions/Services (To the extent offered, check all applicable and attach tariff pages):**

- ☐ Toll Presubscription  
☐ Intrastate Special and Switched Access Services to Carriers (facilities-based local carriers only)\*  
☐ N-1-1 Service  
☐ Pole Attachment and Conduit Occupancy  
☐ Pay Telephone Access Lines  
☐ Inmate Operator Service  
☐ Telephone Relay Service

\*Access service tariffs shall be maintained separately and are subject to the Commission's carrier-to-carrier rules found in Chapter 4901:1-7, Ohio Administrative Code.



#### Part IV. – Attestation

Carrier hereby attests to its compliance with pertinent entries and orders issued by the Commission.

---

I am Chief Financial Officer of the IRU Networks, LLC, and am authorized to make statements on its behalf.

I understand that Telephone companies have certain responsibilities to its customers under the Telecommunications Rules (Ohio Adm. Code 4901:1-6). These responsibilities include: warm line service; not committing unfair or deceptive acts and practices; truth in billing requirements; and slamming and preferred carrier freeze requirements. We will comply with the rules of the state of Ohio and understand that non-compliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.

I declare under penalty of perjury that the foregoing is true and correct.

  
Donna Rice Costello, Chief Financial Officer

June 7, 2019  
(Date)

## **LIST OF EXHIBITS**

- EXHIBIT A Description of Proposed Services
- EXHIBIT B Description of the proposed Market area
- EXHIBIT C Explanation of How Proposed Market Area is in the Public Interest
- EXHIBIT D Description of Class of Customers Served
- EXHIBIT E Statement affirming that the registrant has notified the Ohio Department of Taxation of its intent to conduct operations as a telephone utility in the State of Ohio.
- EXHIBIT F Certificate from Ohio Secretary of State and Certificate of Good Standing
- EXHIBIT G Summary describing IRU Networks, LLC's current financial condition, liquidity, and capital resources. Describe internally generated sources of cash and external funds available to support the applicant's operations that are the subject of this certification application.
- EXHIBIT H Copy of financial statements (actual and pro forma income statement and a balance sheet). Indicate if financial statements are based on a certain geographical area(s) or information in other jurisdictions.
- EXHIBIT I Documentation to support the applicant's cash and funding sources
- EXHIBIT J Documentation attesting to the applicant's technical and managerial expertise relative to the proposed service offering(s) and proposed service area
- EXHIBIT K List of names, addresses, and phone numbers of officers and directors, or partners
- EXHIBIT L Documentation indicating the Applicant's corporate structure and ownership
- EXHIBIT M Information regarding any similar operations in other states
- EXHIBIT N A sample copy of the customer bill and disconnection notice the applicant plans to utilize
- EXHIBIT O Notarized affidavit accompanied by a bona fide letter requesting negotiations pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and a proposed timeline for interconnection and offering of services to end users

## **EXHIBIT A – Description of Proposed Services**

IRU Networks, LLC by this Application seeks authority to provide resold local exchange and interexchange telecommunications services to the public by initially reselling services obtained from and utilizing facilities provided by facilities-based carriers. At this time the company has no plans to install facilities in the State of Ohio. IRU Networks, LLC will be utilizing the provisions already in place and provided by the underlying carrier. For local exchange service, IRU Networks, LLC will mirror the existing local calling areas of incumbent local exchange telephone companies. IRU Networks, LLC seeks authority to provide the following services to business customers only:

### **1. Interexchange (switched and dedicated services):**

- A. 1+ and 101XXXX outbound dialing;
- B. 800/888 toll-free inbound dialing;
- C. Directory Assistance

### **2. Local Exchange:**

- A. Local Exchange Services that will enable customers to originate and terminate local calls in the local calling area served by other LECs, including local dial tone and custom calling features.
- B. Switched local exchange services such as flat-rated and measure-rated local services; vertical services, carrier access, and any other switched local services that currently exist or will exist in the future.
- C. Non-switched local services (e.g., private line service) that currently exist or will exist in the future.
- D. Centrex and/or Centrex-like services that currently exist or will exist in the future.
- E. Digital subscriber line, ISDN, and other high capacity line services.

IRU Networks, LLC seeks authority to provide local exchange services initially throughout the State in the areas served by The Ohio Bell Telephone Company d/b/a AT&T Ohio and Frontier North Inc. and interexchange service throughout the State.

## **EXHIBIT B – Description of the proposed Market Area**

Applicant intends to provide interexchange services on a statewide basis and intends to provide local exchange in areas served by The Ohio Bell Telephone Company d/b/a AT&T Ohio.

For a bona fide letter requesting negotiations pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and a proposed timeline for interconnection and offering of services to end users, see EXHIBIT O.

**See attached list of ILEC exchanges IRU Networks, LLC intends to serve.**

Company Name: IRU Networks, LLC  
 dba:  
 Certificate Number:

Select Only AT&T Ohio

Designate Proposed Market Area (PMA) by putting an "X" in appropriate boxes

ILEC	COUNTY	EXCHANGE	PMA
AT&T Ohio	ADAMS	Winchester	X
AT&T Ohio	ATHENS	Nelsonville	X
AT&T Ohio	BELMONT	Barnesville	X
AT&T Ohio	BELMONT	Bellaire	X
AT&T Ohio	BELMONT	Bethesda	X
AT&T Ohio	BELMONT	Martins Ferry-Bridgeport	X
AT&T Ohio	BELMONT	Somerton	X
AT&T Ohio	BELMONT	St. Clairsville	X
AT&T Ohio	BROWN	Aberdeen	X
AT&T Ohio	BROWN	Ripley	X
AT&T Ohio	BUTLER	Middletown	X
AT&T Ohio	BUTLER	Monroe	X
AT&T Ohio	BUTLER	Trenton	X
AT&T Ohio	CHAMPAIGN	Christiansburg	X
AT&T Ohio	CLARK	Donnelsville	X
AT&T Ohio	CLARK	Enon	X
AT&T Ohio	CLARK	Medway	X
AT&T Ohio	CLARK	New Carlisle	X
AT&T Ohio	CLARK	North Hampton	X
AT&T Ohio	CLARK	Pitchin	X
AT&T Ohio	CLARK	South Charleston	X
AT&T Ohio	CLARK	South Vienna	X
AT&T Ohio	CLARK	Springfield	X
AT&T Ohio	CLARK	Tremont City	X
AT&T Ohio	COLUMBIANA	Columbiana	X
AT&T Ohio	COLUMBIANA	East Liverpool	X
AT&T Ohio	COLUMBIANA	East Palestine	X
AT&T Ohio	COLUMBIANA	Leetonia	X
AT&T Ohio	COLUMBIANA	Lisbon	X
AT&T Ohio	COLUMBIANA	New Waterford	X
AT&T Ohio	COLUMBIANA	Rogers	X
AT&T Ohio	COLUMBIANA	Salem	X
AT&T Ohio	COLUMBIANA	Salineville	X
AT&T Ohio	COLUMBIANA	Wellsville	X
AT&T Ohio	COSHOCTON	Conesville	X
AT&T Ohio	COSHOCTON	Coshocton	X
AT&T Ohio	COSHOCTON	West Lafayette	X
AT&T Ohio	CUYAHOGA	Bedford	X
AT&T Ohio	CUYAHOGA	Berea	X
AT&T Ohio	CUYAHOGA	Brecksville	X
AT&T Ohio	CUYAHOGA	Chagrin Falls	X
AT&T Ohio	CUYAHOGA	Cleveland	X
AT&T Ohio	CUYAHOGA	Gates Mills	X
AT&T Ohio	CUYAHOGA	Hillcrest	X
AT&T Ohio	CUYAHOGA	Independence	X

AT&T Ohio	CUYAHOGA	Montrose [CUY]	X
AT&T Ohio	CUYAHOGA	North Royalton	X
AT&T Ohio	CUYAHOGA	Olmsted Falls	X
AT&T Ohio	CUYAHOGA	Strongsville	X
AT&T Ohio	CUYAHOGA	Terrace	X
AT&T Ohio	CUYAHOGA	Trinity	X
AT&T Ohio	CUYAHOGA	Victory	X
AT&T Ohio	ERIE	Bloomington	X
AT&T Ohio	ERIE	Castalia	X
AT&T Ohio	ERIE	Sandusky	X
AT&T Ohio	FAIRFIELD	Carroll	X
AT&T Ohio	FAIRFIELD	Lancaster	X
AT&T Ohio	FAIRFIELD	Rushville	X
AT&T Ohio	FAIRFIELD	Sugar Grove	X
AT&T Ohio	FAYETTE	Bloomington	X
AT&T Ohio	FAYETTE	Jeffersonville	X
AT&T Ohio	FAYETTE	Milledgeville	X
AT&T Ohio	FAYETTE	Washington Court House	X
AT&T Ohio	FRANKLIN	Alton	X
AT&T Ohio	FRANKLIN	Canal Winchester	X
AT&T Ohio	FRANKLIN	Columbus	X
AT&T Ohio	FRANKLIN	Dublin	X
AT&T Ohio	FRANKLIN	Gahanna	X
AT&T Ohio	FRANKLIN	Grove City	X
AT&T Ohio	FRANKLIN	Groveport	X
AT&T Ohio	FRANKLIN	Harrisburg	X
AT&T Ohio	FRANKLIN	Hilliard	X
AT&T Ohio	FRANKLIN	Lockbourne	X
AT&T Ohio	FRANKLIN	New Albany	X
AT&T Ohio	FRANKLIN	Reynoldsburg	X
AT&T Ohio	FRANKLIN	Westerville	X
AT&T Ohio	FRANKLIN	Worthington	X
AT&T Ohio	GALLIA	Cheshire	X
AT&T Ohio	GALLIA	Gallipolis	X
AT&T Ohio	GALLIA	Guyan	X
AT&T Ohio	GALLIA	Rio Grande	X
AT&T Ohio	GALLIA	Vinton	X
AT&T Ohio	GALLIA	Walnut	X
AT&T Ohio	GEAUGA	Burton	X
AT&T Ohio	GEAUGA	Chesterland	X
AT&T Ohio	GREENE	Beavercreek	X
AT&T Ohio	GREENE	Bellbrook	X
AT&T Ohio	GREENE	Bowersville	X
AT&T Ohio	GREENE	Cedarville	X
AT&T Ohio	GREENE	Fairborn	X
AT&T Ohio	GREENE	Jamestown	X
AT&T Ohio	GREENE	Spring Valley	X
AT&T Ohio	GREENE	Xenia	X
AT&T Ohio	GREENE	Yellow Springs-Clifton	X
AT&T Ohio	HANCOCK	Findlay	X
AT&T Ohio	HIGHLAND	Belfast	X



AT&T Ohio	HIGHLAND	Danville [HIG]	X
AT&T Ohio	HIGHLAND	Hillsboro	X
AT&T Ohio	HIGHLAND	Marshall	X
AT&T Ohio	HIGHLAND	Rainsboro	X
AT&T Ohio	HIGHLAND	Sugar Tree Ridge	X
AT&T Ohio	HOCKING	Murray City	X
AT&T Ohio	JEFFERSON	Mingo Junction	X
AT&T Ohio	JEFFERSON	Steubenville	X
AT&T Ohio	JEFFERSON	Toronto	X
AT&T Ohio	LAKE	Leroy	X
AT&T Ohio	LAKE	Mentor	X
AT&T Ohio	LAKE	Painesville	X
AT&T Ohio	LAKE	Wickliffe	X
AT&T Ohio	LAKE	Willoughby	X
AT&T Ohio	LAWRENCE	Arabia	X
AT&T Ohio	LAWRENCE	Ironton	X
AT&T Ohio	LUCAS	Holland	X
AT&T Ohio	LUCAS	Maumee	X
AT&T Ohio	LUCAS	Toledo	X
AT&T Ohio	LUCAS	Whitehouse	X
AT&T Ohio	MADISON	London	X
AT&T Ohio	MADISON	Sedalia	X
AT&T Ohio	MADISON	South Solon	X
AT&T Ohio	MADISON	West Jefferson	X
AT&T Ohio	MAHONING	Canfield	X
AT&T Ohio	MAHONING	Lowellville	X
AT&T Ohio	MAHONING	North Jackson	X
AT&T Ohio	MAHONING	North Lima	X
AT&T Ohio	MAHONING	Sebring	X
AT&T Ohio	MAHONING	Youngstown	X
AT&T Ohio	MIAMI	Fletcher-Lena	X
AT&T Ohio	MIAMI	Piqua	X
AT&T Ohio	MONROE	Beallsville	X
AT&T Ohio	MONROE	Clarington	X
AT&T Ohio	MONROE	Duffy	X
AT&T Ohio	MONROE	Graysville	X
AT&T Ohio	MONROE	Lewisville	X
AT&T Ohio	MONROE	Woodsfield	X
AT&T Ohio	MONTGOMERY	Centerville [MOT]	X
AT&T Ohio	MONTGOMERY	Dayton	X
AT&T Ohio	MONTGOMERY	Miamisburg-W. Carrollton	X
AT&T Ohio	MONTGOMERY	Vandalia	X
AT&T Ohio	MUSKINGUM	Dresden	X
AT&T Ohio	MUSKINGUM	Fultonham	X
AT&T Ohio	MUSKINGUM	Norwich	X
AT&T Ohio	MUSKINGUM	Philo	X
AT&T Ohio	MUSKINGUM	Zanesville	X
AT&T Ohio	PERRY	Corning	X
AT&T Ohio	PERRY	Glenford	X
AT&T Ohio	PERRY	New Lexington	X
AT&T Ohio	PERRY	Roseville	X

AT&T Ohio	PERRY	Shawnee	X
AT&T Ohio	PERRY	Somerset	X
AT&T Ohio	PERRY	Thornville	X
AT&T Ohio	PICKAWAY	New Holland	X
AT&T Ohio	PORTAGE	Atwater	X
AT&T Ohio	PORTAGE	Kent	X
AT&T Ohio	PORTAGE	Mantua	X
AT&T Ohio	PORTAGE	Mogadore	X
AT&T Ohio	PORTAGE	Ravenna	X
AT&T Ohio	PORTAGE	Rootstown	X
AT&T Ohio	SANDUSKY	Fremont	X
AT&T Ohio	SANDUSKY	Lindsey	X
AT&T Ohio	SENECA	Fostoria	X
AT&T Ohio	SENECA	New Riegel	X
AT&T Ohio	SENECA	Tiffin	X
AT&T Ohio	STARK	Alliance	X
AT&T Ohio	STARK	Canal Fulton	X
AT&T Ohio	STARK	Canton	X
AT&T Ohio	STARK	Hartville	X
AT&T Ohio	STARK	Louisville	X
AT&T Ohio	STARK	Magnolia-Waynesburg	X
AT&T Ohio	STARK	Marlboro	X
AT&T Ohio	STARK	Massillon	X
AT&T Ohio	STARK	Navarre	X
AT&T Ohio	STARK	North Canton	X
AT&T Ohio	STARK	Uniontown	X
AT&T Ohio	SUMMIT	Akron	X
AT&T Ohio	SUMMIT	Greensburg	X
AT&T Ohio	SUMMIT	Manchester [SUM]	X
AT&T Ohio	TRUMBULL	Girard	X
AT&T Ohio	TRUMBULL	Hubbard	X
AT&T Ohio	TRUMBULL	Kirtland	X
AT&T Ohio	TRUMBULL	Niles	X
AT&T Ohio	TRUMBULL	Sharon	X
AT&T Ohio	TUSCARAWAS	Gnadenhutten	X
AT&T Ohio	TUSCARAWAS	Newcomerstown	X
AT&T Ohio	TUSCARAWAS	Uhrichsville	X
AT&T Ohio	WARREN	Franklin	X
AT&T Ohio	WASHINGTON	Belpre	X
AT&T Ohio	WASHINGTON	Marietta	X
AT&T Ohio	WASHINGTON	New Matamoras	X
AT&T Ohio	WASHINGTON	Newport	X
AT&T Ohio	WAYNE	Dalton	X
AT&T Ohio	WOOD	Perrysburg	X
AT&T Ohio	WYANDOT	Upper Sandusky	X
X			

**EXHIBIT C – Explanation of how the proposed services in the proposed market area  
are in the public interest**

Granting this Application will promote the public interest by increasing competition in the provision of telecommunications services in Ohio.

IRU Networks, LLC will provide customers high quality, cost effective telecommunications service, with an emphasis on customer service. In addition to driving prices closer to costs, thereby ensuring just and reasonable rates and competition also promotes efficiency in the delivery of services and in the development of new services. These very real benefits work to maximize the public interest by providing continuing incentives for carriers to reduce costs, while simultaneously promoting the availability of potentially desirable services.

**EXHIBIT D— Description of the class of customers (e.g., residence, business)  
that the applicant intends to serve**

IRU Networks intends to serve business customers. Applicant does not intend to market residential customers but is aware of Commission Rules in that they will not refuse a residential customer that wishes to purchase their service.

**EXHIBIT E- Statement Affirming that the Registrant has notified the Ohio Department of  
Taxation of its Intent to Conduct Operations as a Telephone Utility in the State of Ohio**

**See Attached**

IRU Networks, LLC  
3030 NW Expressway, Ste. 200-328  
Oklahoma City, Oklahoma 73112  
(888) 250-2111 (Phone)

June 20, 2019

Ohio Department of Taxation  
c/o Public Utility Section  
21<sup>st</sup> Floor  
30 East Broad Street  
Columbus, OH 43215-3793  
(800) 282-1780

RE: IRU Networks, LLC

Dear Sir/Madam:

Please be advised that IRU Networks, LLC intends to provide telecommunications service in the State of Ohio after receiving approval of its application filed with the Public Utilities Commission of Ohio.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donna Rice Costello", with a stylized flourish at the end.

Donna Rice Costello  
Chief Financial Officer  
IRU Networks, LLC



**EXHIBIT F - Certification from Ohio Secretary of State and Certificate of Good Standing**

**See Attached**



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
05/21/2019	201914101218	REGISTRATION OF FOREIGN FOR PROFIT LLC (LFP)	99.00	0.00	0.00	0.00

**Receipt**

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

LANCE J.M. STEINHART  
1725 WINDWARD CONCOURSE  
SUITE 150  
ALPHARETTA, GA 30005

**STATE OF OHIO  
CERTIFICATE**

**Ohio Secretary of State, Frank LaRose**  
4338955

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

**IRU NETWORKS, LLC**

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

Document(s)

**REGISTRATION OF FOREIGN FOR PROFIT LLC**

Effective Date: 05/21/2019

Document No(s):

**201914101218**



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  
21st day of May, A.D. 2019.

**Ohio Secretary of State**

OFFICE OF THE SECRETARY OF STATE



**CERTIFICATE OF GOOD STANDING  
DOMESTIC LIMITED LIABILITY COMPANY**

*I, THE UNDERSIGNED, Secretary of State of the State of Oklahoma, do hereby certify that I am, by the laws of said state, the custodian of the records of the state of Oklahoma relating to the right of certain business entities to transact business in this state and am the proper officer to execute this certificate.*

*I FURTHER CERTIFY that IRU NETWORKS, LLC whose registered agent is DONNA RICE COSTELLO, with its registered office at 3030 NW EXPRESSWAY SUITE 200-328 OKLAHOMA CITY 73112 USA Oklahoma is a Domestic Limited Liability Company duly organized and existing under and by virtue of the laws of the state of Oklahoma and is in good standing according to the records of this office. This certificate is not to be construed as an endorsement, recommendation or notice of approval of the entity's financial condition or business activities and practices. Such information is not available from this office.*



*IN TESTIMONY WHEREOF, I hereunto set my hand and affixed the Great Seal of the State of Oklahoma, done at the City of Oklahoma City, this 21st, day of May, 2019.*

*[Handwritten Signature]*

Secretary Of State

**EXHIBIT G— Summary describing IRU Networks, LLC's current financial condition, liquidity and capital resources. Describe internally generated sources of cash and external funds available to support the applicant's operations that are the subject of this certification application**

**See Exhibit H**

**EXHIBIT H - Copy of financial statements (actual and pro forma income statement and a balance sheet). Indicate if financial statements are based on (a) certain geographical area(s) or information in other jurisdictions**

Filed Separately Under Seal with Motion for Protective Order

**EXHIBIT I– Documentation to support the applicant’s cash and funding sources**

**See Exhibit H**



**EXHIBIT J- Documentation attesting to the applicant's technical and managerial expertise relative to the proposed service offering (s) and proposed service area**

**Donna Rice Costello** has been part of the telecommunications industry since 2011 concentrating in promotions and marketing. She also brings financial and management expertise to IRU Networks from her previous experience in the banking industry and as past president and board member of a national non-profit organization.

**Brent West** began his telecommunications career at the age of 16 by interning with Southwestern Bell and later attending AT&T's executive training program. He joined USA Digital Communications in July 2002. Prior to that, Mr. West was President for North American for Inter.net Global. In addition, he was Technical Services Manager for PSINet, where he helped split off and later head the North American consumer division. Over the last 20+ years Mr. West has sharpened his skills in product development, switch management and carrier relations and has brought this invaluable knowledge to IRU Networks.

**EXHIBIT K - List of names, addresses, and phone numbers of officers and directors, or partners**

**OFFICERS:**

**Donna Rice Costello**  
**Jere Brent West**

**CFO**  
**President**

All the above referenced Officers can be reached at the Business Address of:  
3030 NW Expressway, Ste. 200-328, Oklahoma City, Oklahoma 73112  
(888) 250-2111 (Phone)

**EXHIBIT L – Documentation indicating the Applicant's corporate structure and ownership**

Applicant is an Oklahoma Limited Liability Company

Applicant's ownership is as follows:

Name and percentage owned

Donna Rice Costello	50%
Jere Brent West	50%

**EXHIBIT M - Information regarding any similar operations in other states**

IRU Networks has not been previously certified in the State of Ohio. IRU Networks is currently authorized in California, Georgia, Illinois, Massachusetts, Missouri, Nevada, New York, and Pennsylvania to provide local and/or interexchange service. IRU Networks has not been denied authority for any of the services for which it seeks authority in this Application.

**EXHIBIT N – A sample copy of the customer bill and  
disconnection notice the applicant plans to utilize**

**See Attached**

## Sample Bill

**Customer:** [Insert Customer's Name]

**Address:** [Insert Address]

**Account No.:** [Insert account number or phone number]

Billing Date	Billing Period	Date Due

**IRU Networks, LLC**

3030 NW Expressway, Ste. 200-328,

Oklahoma City, Oklahoma 73112

FOR BILLING INQUIRIES: 1-XXX-XXX-XXXX

FOR SERVICE INQUIRIES: 1-XXX-XXX-XXXX

Description	Rate	Quantity	Amount
Current Month's Charges			
Credits applied to account:			
Unpaid charges from previous bill:			
Late payments:			
Charges for regulated competitive service:			
Non-Recurring, fractional or nonbasic service charges:			
Charges for nonregulated services or products:			
Taxes and surcharges: [include summary]			
9-1-1 charges:			
An itemization of toll charges is attached.			
Total Due	\$		

Please remit this bill via U.S. Mail to the address listed on this invoice.

If your complaint is not resolved after you have called IRU Networks, LLC

, or for general utility information, residential and business customers may call the Public Utilities Commission of Ohio (PUCO), toll free at 1-800-686-7826 or for TTY toll free at 1-800-686-1570 from 8:00 a.m. to 5:00 p.m. weekdays, or visit [www.puco.ohio.gov](http://www.puco.ohio.gov).

The Ohio Consumers' Counsel (OCC) represents residential utility customers in matters before the PUCO. The OCC can be contacted toll free at 1-877-742-5622 from 8:00 a.m. to 5:00 p.m. weekdays, or visit [www.pickocc.org](http://www.pickocc.org).



## ITEMIZATION OF CHARGES

Itemization of charges:

- Toll charge per call –

Itemization of toll service charges:

Date and time of placement	Destination (City, State)	Telephone Number Called	Total Charge per call (e.g., day, night / weekend, calling card)	Duration of Call	Total Toll Charges

Please note: Nonpayment of toll charges may result in the disconnection of toll service and may be subject to collection actions but will not result in the disconnection of local service.

## DISCONNECTION NOTICE

IRU Networks, LLC

June 20, 2019

Customer Name  
Address 1  
Address 2  
City, State, Zip

Account Number: xxxxxxxx  
**Amount Past Due: \$xxxx.xx**

This will serve as notice that IRU Networks, LLC intends to disconnect your long distance telephone service. IRU Networks, LLC has decided to take this action, because it has not received payment for services since [insert date]. The total amount past due is [insert amount]. Failure to pay the amount required at the company's office or to one of its authorized agents by [insert date] may result in the disconnection of toll services. Payments to an unauthorized payment agent may result in the untimely or improper crediting of your account.

The reasons for disconnection of service are [insert reasons]. In order to avoid the disconnection, the subscriber must take the following action [insert action taken and amount of payment to be made which is not greater than past due balance, not including nonregulated services]. The earliest date when disconnection will occur is [insert date].

Please note that the total amount due for toll charges is [insert figure]. [If applicable – The total amount due for nonregulated charges is [insert figure]. However, nonpayment of nonregulated charges cannot result in the disconnection of local service or regulated toll service.]

If you wish to contact IRU Networks, LLC to discuss your account, please call or send all correspondence to:

Brent West, President  
IRU Networks, LLC  
3030 NW Expressway, Ste. 200-328  
Oklahoma City, Oklahoma 73112

Phone: (888) 250-2111  
Hours: 8:00 a.m. to 5:00 p.m. EST

If you have a complaint in regard to this disconnection notice that cannot be resolved after you have called IRU Networks, LLC, or for general utility information, residential and business customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll free) or for TTY at 1-800-686-1570 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at [www.puco.ohio.gov](http://www.puco.ohio.gov).

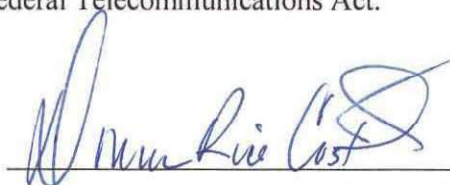
**EXHIBIT O – Notarized affidavit accompanied by a bona fide letter requesting negotiations pursuant to Sections 251 and 252 of the Telecommunications Act of 1996 and a proposed timeline for interconnection and offering of services to end users**

**See Attached**

# AFFIDAVIT

BEFORE ME, the undersigned authority, personally appeared Donna Rice Costello, who under oath, stated as follows:

1. My name is Donna Rice Costello. I am Chief Financial Officer of IRU Networks, LLC.
2. I swear or affirm that I have personal knowledge of the facts stated in the foregoing application, that I am competent to testify to them, and that I have the authority to make this application on its behalf. I further swear or affirm that all of the statements and representations made in the application are true and correct.
3. No additional "construction" or installation of facilities is required before IRU Networks, LLC is able to provide services in Ohio.
4. IRU Networks, LLC will begin providing service as soon as practicable after interconnection.
5. IRU Networks, LLC is negotiating an Interconnection Agreement pursuant to Sections 251 and 252 of the Federal Telecommunications Act.



Donna Rice Costello, Chief Financial Officer  
IRU Networks, LLC

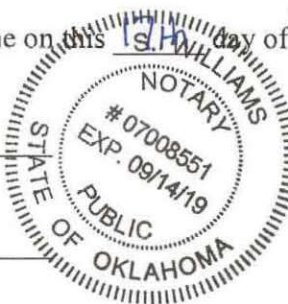
SWORN TO AND SUBSCRIBED before me on this 17th day of June, 2019.



Notary Public

My Commission Expires:

9.14.19



**Lance J.M. Steinhart, P.C.**

Attorneys At Law  
1725 Windward Concourse  
Suite 150  
Alpharetta, Georgia 30005

Also Admitted in New York  
Email: [info@telecomcounsel.com](mailto:info@telecomcounsel.com)

Telephone: (770) 232-9200  
Facsimile: (770) 232-9208

June 20, 2019

**VIA EMAIL: [m41654@att.com](mailto:m41654@att.com)**

Contract Management  
AT&T Wholesale  
311 S. Akard  
Four AT&T Plaza, 9<sup>th</sup> Floor  
Dallas, Texas 75202

Re: IRU Networks, LLC; New State ICA

Dear Contract Manager:

I represent IRU Networks, LLC, which is an Oklahoma limited liability company seeking CLEC certification in Ohio. IRU Networks, LLC is applying for CLEC authority in Ohio but does not currently hold a CLEC certification in the state.

This letter is a formal request to negotiate IRU Networks, LLC's Interconnection Agreement pursuant to Sections 251 and 252 of the Federal Telecommunications Act. IRU Networks, LLC is willing to accept AT&T's standard offering for an interconnection agreement in Ohio.

Respectfully submitted,



Lance J.M. Steinhart, Esq.  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
*Attorneys for IRU Networks, LLC*

Enclosure

cc: Donna Rice Costello

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**6/21/2019 4:20:35 PM**

**in**

**Case No(s). 19-1350-TP-ACE**

Summary: Application Application of IRU Networks, LLC electronically filed by Lance  
Steinhart on behalf of IRU Networks, LLC