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VIA E-FILING

September 5, 2019

Barcy McNeal, Commission Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793
Attention: Docketing Division

**RE: Case No. 19-1743-TP-ACE
Hudson Fiber Network Inc. Application to Provide Telecommunications
Services Throughout the State of Ohio**

Dear Secretary McNeal:

Enclosed for filing is an Application of Hudson Fiber Network Inc. for a Certificate to Provide Telecommunications Services throughout the State of Ohio.

Please acknowledge receipt and acceptance of this application. Should you have any questions concerning this filing, please do not hesitate to contact the undersigned at 202-739-3000.

Respectfully submitted,

/s/Christian Hoefly

Ronald W. Del Sesto, Jr.
Stephany Fan
Christian Hoefly

On behalf of Hudson Fiber Network Inc.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

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 Hudson Fiber Network Inc.

) TRF Docket No. 90 -

) Case No. **19-1743 - TP - ACE**

to Provide Telecommunication Services throughout the State of Ohio

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

Name of Registrant(s) Hudson Fiber Network Inc.

DBA(s) of Registrant(s) _____

Address of Registrant(s) 3030 Warrenville Rd., Suite 340, Lisle, IL 60532

Company Web Address www.extenetsystems.com

Regulatory Contact Person(s) Brian Kirk - Deputy General Counsel Phone 630-505-3800 Fax N/A

Regulatory Contact Person's Email Address compliance@util.extenetsystems.com

Contact Person for Annual Report Donna Cahill - Tax & Compliance Phone 630-505-3800

Address (if different from above) _____

Consumer Contact Information Matt Simpson - Executive Director, Network Operations Phone 1-888-436-3690

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 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

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

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

Type of Notice	Direct Mail	Bill Insert	Bill Notation	Electronic Mail
<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"/>
Date Notice Sent:				

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

IOS	Introduce New	Tariff Change	Price Change	Withdraw
<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 1-6-08 * (Auto 30- day)	<input type="checkbox"/> ACE 1-6-08 *(Auto 30 day)	<input checked="" type="checkbox"/> ACE 1-6-08 *(Auto 30 day)	<input type="checkbox"/> ACE 1-6-10 (Auto 30 day)	<input type="checkbox"/> UNC 1-6-09 *(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 1-6-26 (Auto 30 days)	<input type="checkbox"/> ABN 1-6-26 (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ACN 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> ACO 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Merger *	<input type="checkbox"/> AMT 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> AMT 1-6-29(E) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ATC 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> ATR 1-6-29(B) (Auto 30 days)	<input type="checkbox"/> CIO 1-6-29(C) (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 1-7-07 (Auto 90 day)	<input type="checkbox"/> NAG 1-7-07 (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)	<input type="checkbox"/> ARB 1-7-09 (Non-Auto)
Introduce or change c-t-c service tariffs	<input type="checkbox"/> ATA 1-7-14 (Auto 30 days)	<input type="checkbox"/> ATA 1-7-14 (Auto 30 days)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC 1-7-04 or 05 (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 1-3-04 (Auto 60 days)	
Wireless Providers See 4901:1-6-24	<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, Hudson Fiber Network, and am authorized to make this statement on its behalf.

(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)

at (Location)

*Signature and

Title

Date

**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

Date

**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 Hudson Fiber Network Inc.
to _____

)
)
)
)

Case No. 19 - 1743 - TP - ACE

Name of Registrant(s) Hudson Fiber Network Inc.

DBA(s) of Registrant(s) _____

Address of Registrant(s) 3030 Warrenville Rd., Suite 340, Lisle, IL 60532

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

☐ 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 State¹ &
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.

¹ 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)
- ☐ 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 H. Anthony Lehv, Secretary & Senior Vice President
(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

03/26/19

at

LISLE, ILLINOIS

H. Anthony Lehv
(Signature and Title)

3/26/19

(Date)

LIST OF EXHIBITS AND ATTACHMENTS

Exhibit A	Description of Proposed Services
Exhibit A-1	Telecommunications Retail Service Offering Form
Exhibit B	Statement About the Provision of CTS Services
Exhibit C	Description of General Geographic Area Served
Exhibit D	Public Interest Statement
Exhibit E	Description of the Class of Customers
Exhibit F	Ohio Department of Taxation Registration
Exhibit G	Certificate of Good Standing
Exhibit H	Summary of Financial Condition, Liquidity and Capital Reserves
Exhibit H-1	Motion for Protective Order
Exhibit H-2	Financial Information of ExteNet Systems, Inc.
Exhibit I	Technical and Managerial Expertise
Exhibit J	Description of Applicant's Ownership Structure
Exhibit J-1	Ownership Structure of Applicant
Exhibit K	Similar Operations in Other States
Exhibit L	Accounting Statement
Exhibit M	Derivation of Rates
Exhibit N	Interconnection and Resale Statement
Exhibit O	Notarized Affidavit Regarding Interconnection Negotiations – NOT APPLICABLE
Exhibit P	Sample Customer Bill and Disconnection Notice
Exhibit P-1	Sample Customer Bill
Exhibit P-2	Sample Customer Disconnection Notice

EXHIBIT A

Description of Proposed Services

Hudson Fiber Network Inc.'s ("Applicant" or "HFN") business is providing communications solutions to enterprise, carrier and governmental customers for each project's needs. Applicant will primarily provide point-to-point telecommunications services such as Private Line, Ethernet, Wavelength, Distributed Networks, and similar services to wholesale customers (e.g., other carriers and providers), government customers, and health care, education, financial services, and other enterprise customers. Applicant will provide services primarily using its own facilities and facilities leased from other carriers, but also seeks authority to provide service via resale arrangements. Applicant provides most of its services using fiber optic cable along with other equipment and facilities to originate, terminate, and amplify signals. Applicant does not have plans to deploy specific facilities in Ohio at this time.

Applicant plans to provide de-tariffed services that are regulated but are not required to be filed in a tariff. In lieu of a tariff, therefore, Applicant provides the Telecommunications Retail Service Offering Form attached as Exhibit A-1.

EXHIBIT A-1

Telecommunications Retail Service Offering Form

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 Hudson Fiber Network Inc.

Company Address 3030 Warrenville Rd., Suite 340, Lisle, IL 60532

Company Web Address www.extenetsystems.com

Regulatory Contact Person Brian Kirk - Deputy General Counsel Phone 630-505-3800 Fax N/A

Regulatory Contact Person's Email Address compliance@util.extenetsystems.com

Contact Person for Annual Report Donna Cahill - Tax & Compliance Phone 630-505-3800 Fax N/A

Consumer Contact Information Matt Simpson - Executive Director, Network Operations Phone 1-888-436-3690 Fax N/A

TRF Docket No. - -TP-TRF

I. Company Type (Check all applicable):

☐ Non-BLES CLEC ☐ IXC ☒ Other (explain) Telecommunications Service Provider Not Offering Local Exchange Service

II. Services offered (Check all applicable):

☐ Toll services (intrastate)

☐ Local Exchange Service (i.e., residential or business bundles)

☒ Other (explain) Private Line, including Ethernet and Wavelength, services

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

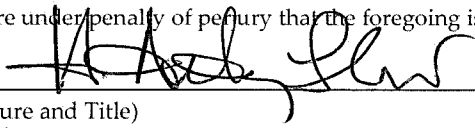
Carrier hereby attests to its compliance with pertinent entries and orders issued by the Commission.

H. Anthony Lehv, Secretary & Senior Vice President

I am an officer/agent of the carrier/telephone company, Hudson Fiber Network Inc., and am authorized to make statements on it behalf.
(Name)

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.


(Signature and Title)

3/26/19
(Date)

EXHIBIT B

Statement about the Provision of CTS Services

As described in this Application, Applicant will provide competitive telecommunications services. Applicant does not seek to provide basic local exchange services or competitive emergency services telecommunications carrier services.

EXHIBIT C

Description of General Geographic Area Served

Applicant proposes to provide competitive resold and facilities-based telecommunications services throughout the State of Ohio.

EXHIBIT D

Public Interest Statement

Grant of this Application will promote the public interest by increasing competition in the provision of telecommunications services in Ohio. Applicant may deploy and expand a competitive telecommunications infrastructure in the State, thereby driving prices closer to costs and ensuring just and reasonable rates in addition to promoting efficiency in the delivery of services and in the development of new services. Applicant will provide customers high quality, cost effective telecommunications services, with an emphasis on customer service. Applicant has experience in providing competitive and innovative products through its parent, ExteNet Systems, Inc. (“ESI”). Given that Applicant and ESI share the same management team, Applicant’s customers will benefit from that team’s knowledge and experience in the Ohio market. Applicant expects to offer customers a wide array of services, thus providing Ohio consumers greater choice for innovative and technologically advanced telecommunications services, high quality customer service, and competitive prices. These 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 E

Description of the Class of Customers

Applicant will primarily provide services to wholesale (e.g., other carriers) customers and customers in government, health care, education, financial services, and other enterprises.

Applicant does not intend to provide services to residential customers.

EXHIBIT F

Ohio Department of Taxation Registration



Department of
Taxation

Registration Confirmation

Taxpayer Services Division
P. O. Box 182215
Columbus, OH 43218-2215
Phone: 1-888-405-4089
Fax: 1-614-387-2165
TTY/TDD: 1-800-750-0750
tax.ohio.gov

5/10/2017

Hudson Fiber Network Inc
RBM LLP
Shreveport, LA 71101

RE: Account Type: SELLER'S USE TAX
Account Number: 99107022
Effective Date: 5/1/2017
Filing Frequency: MONTHLY

TIN: 8

Dear Taxpayer:

Please verify the information listed below is complete and accurate. If there are corrections and/or additions, please note them on this form and return it by mail or fax. You may also contact us by telephone or by e-mail through our Web site at tax.ohio.gov.

Legal Name: Hudson Fiber Network Inc
Federal Employer Identification Number: 262552717
Social Security Number:
Ohio Charter Number:

You can file and pay your use tax returns electronically through the Ohio Business Gateway at obg.ohio.gov. Payments may be made directly from your bank account (electronic check) or by credit card.

The Ohio Department of Taxation must receive all returns and payments on or before the 23rd of the month following the end of the reporting period. Failure to file and pay taxes due in a timely manner may result in the loss of discount and the imposition of interest, penalties and/or additional charges. You must file a return even if you made no taxable sales for the filing period.

If you have questions concerning your tax responsibilities or how to file your return(s) please contact us.

OBG SELLER'S USE

Certificate of Registration
Ohio Department of Taxation
P.O. Box 182215, Columbus, OH 43218-2215

Hudson Fiber Network Inc
RBM LLP
Shreveport, LA 71101

License Type: SELLER'S USE TAX
Account #: 99107022
Effective Date: 5/1/2017

This is to certify that the above registrant is authorized to make retail sales subject to taxes levied pursuant to Chapter 5741 of the Ohio Revised Code.

A new registration must be obtained if the business is sold or if the form of ownership changes. An ownership change includes, but is not limited to, incorporating a business, changing from a partnership to a sole proprietor, a sole proprietorship to a partnership, or any similar entity change.

EXHIBIT G

Certificate of Good Standing

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show HUDSON FIBER NETWORK, INC. , a New Jersey corporation, having qualified to do business within the State of Ohio on May 12, 2017 under License No. 4028547 is currently in GOOD STANDING upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 3rd day of April, A.D. 2019.*

A handwritten signature in red ink, appearing to read "Frank LaRose", written in a cursive style.

Ohio Secretary of State

Validation Number: 201909300950

EXHIBIT H

Summary of Financial Condition, Liquidity and Capital Reserves

[CONFIDENTIAL - FILED UNDER SEAL]

Applicant possesses the requisite financial resources to provide telecommunications services in Ohio. Applicant does not maintain financial statements separate from the consolidated financial statements of its indirect parent company, ESI. For purposes of this Application, Applicant will rely on the financial statements of ESI to demonstrate Applicant's financial qualification to operate within Ohio. The most recent annual consolidated financial statements of ESI are provided as CONFIDENTIAL Exhibit H-2. The information provided in CONFIDENTIAL Exhibit H-2 is proprietary and Applicant requests, pursuant to OAC 4901-1-24(D) of the Commission's Rules that this information be treated confidentially, as it contains sensitive information regarding Applicant's business operations which is not normally subject to inspection by the public. As shown in the financial statement, through ESI, Applicant has sufficient capital resources and is financially qualified to operate within the State of Ohio.

)	
Application of)	
)	
Hudson Fiber Network Inc.)	
)	Case No. 19-1743-TP-ACE
for a Certificate of Public Convenience and)	
Necessity to Provide Telecommunications)	
Services throughout the State of Ohio)	
)	
)	

(FILED UNDER SEAL)

EXHIBIT H-1

Motion for Protective Order

)	
Application of)	
)	
Hudson Fiber Network Inc.)	
)	Case No. 19-1743-TP-ACE
for a Certificate of Public Convenience and)	
Necessity to Provide Telecommunications)	
Services throughout the State of Ohio)	
)	
)	

Hudson Fiber Network Inc. (“HFN”), by its attorneys and pursuant to OAC 4901-1-24(D), moves for a protective order to prevent public disclosure of the confidential and proprietary financial information included as **Exhibit H-2** in the above-referenced application. In support of this Motion, HFN states as follows:

2. ESI is a privately held company and is not required to file financial information with the United States Securities and Exchange Commission and does not otherwise disclose its financial information to the public.

3. ESI uses its best efforts to keep and maintain the confidentiality of the Confidential Exhibit. To the best of the Company's knowledge, the Confidential Exhibit has not been disclosed or released to the public.

4. The Confidential Exhibit derives economic value from not being generally known to and not being readily ascertainable by proper means by other person who can obtain economic

value from their disclosure and use. Specifically, the information contained therein is extremely sensitive financial information that could be used by competitors to determine revenue and other information damaging to the Company. Disclosure of such information would be extremely detrimental and could be used by the Company's competitors to materially affect the Company's ability to compete effectively.

5. Due to the sensitive nature of the Confidential Exhibit, it is appropriate for the Commission to limit access to it. The Confidential Exhibit should solely be used by the Commission in exercising its governmental functions in considering HFN's Application. There is no legitimate purpose or public interest to be served in disclosing the Confidential Exhibit to the Company's current or future competitors or to any person other than the appropriate staff of the Commission.

WHEREFORE, Hudson Fiber Network Inc. respectfully requests that the Commission grant a Protective Order allowing **Exhibit H-2** of the Application to be treated as confidential.

Respectfully submitted,



Ronald W. Del Sesto, Jr.
Stephany Fan
Christian Hoefly
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: (202) 739-3000
Fax: (202) 739-3001
ronald.delsesto@morganlewis.com
stephany.fan@morganlewis.com

Counsel for Hudson Fiber Network Inc.

Dated: September 5, 2019

EXHIBIT H-2

Financial Information of ExteNet Systems, Inc.

[CONFIDENTIAL - FILED UNDER SEAL]

EXHIBIT I

Technical and Managerial Expertise

Applicant has the technical and financial ability to provide the proposed services. Applicant will be managed and operated by capable, experienced executives and employees of its indirect parent, ESI, which individuals possess extensive managerial, financial, and technical experience in the telecommunications industry. These individuals have both highly effective management skills and considerable telecommunications expertise. The biographies of these key executives are submitted as evidence that Applicant possesses the managerial and technical capability necessary to provide high quality services to customers in Ohio. Biographies of the key personnel that will be managing Applicant, are as follows:

James Hyde – Chief Executive Officer

James Hyde brings more than 20 years of experience in telecommunications and digital infrastructure to ExteNet as well as deep expertise in operations, general management and sales.

Prior to joining ExteNet, Mr. Hyde served as President of Prepaid Group, Wholesale, Affiliates and Strategic Partnerships at Sprint, where he led the company's efforts to build out its MVNO and prepaid services businesses. Mr. Hyde also ran a number of other business units at Sprint including Boost Mobile, Virgin Mobile, and Assurance Wireless.

Previously, Mr. Hyde was the Executive Chairman at Fastback Networks, a wireless backhaul solutions provider. Earlier in his career, Mr. Hyde held management and board director roles at GPS Industries, Lumos Networks, NTELOS Holdings and T-Mobile UK.

Mr. Hyde graduated from Arizona State University with a Bachelor of Science degree in Finance and was a member of the 1988 U.S. Olympic weightlifting team. He has been active in several industry associations including Competitive Carriers Association (CCA) and CTIA where he previously served in various leadership roles.

Richard Coyle, Executive Vice President

Richard Coyle has over twenty years of growing and improving the operational, financial and market position of businesses.

Prior to his role with ExteNet, Mr. Coyle served as Operating Partner for Fiber at Digital Bridge Holdings LLC, where was responsible for executing the firm's investments in global fiber networks and lending his operations expertise to the businesses. Previously, Mr. Coyle served as Senior Vice President of Network Operations at Wilcon, a fiber and data center infrastructure solutions

provider, where he built the company into a leading fiber provider for Los Angeles-serving enterprises, carriers and dark fiber customers.

Before joining Wilcon, Mr. Coyle was Senior Vice President of Operations at Zayo Group where he led operations for their metro fiber networks throughout the United States. He has also held management roles at American Fiber Systems, IDACOMM and Sierra Pacific Resources.

Mr. Coyle graduated from City University of New York-Queens College with a degree in Accounting.

Garth Williams – Executive Vice President and Treasurer

Garth Williams joined ExteNet Systems as its Executive Vice President & CFO in May 2019. Garth brings deep expertise in finance and accounting as well as management of finance departments to ExteNet.

For the past six years, Garth served as the Chief Financial Officer and Chief Administrative Officer for Kroll, a global cyber security, risk management and information services company. Previously, he served at American Tower Corporation in various senior finance roles including Investor Relations, International Reporting and Treasury. He began his career as an investment banker at Morgan Stanley and worked in their Melbourne, Hong Kong and New York offices.

Garth has degrees in accounting and finance from the University of Auckland and a law degree from Melbourne University.

H. Anthony Lehv – Senior Vice President & Secretary

H. Anthony Lehv joined ExteNet in 2016 and has brought extensive legal skills and experience to the company, with more than 20 years as a telecommunications and business lawyer in private practice and corporate law departments. Mr. Lehv was most recently a Partner in the telecommunications and real estate practice at Prince, Lobel & Tye, a Boston-based law firm, where he represented tower companies and DAS and small cell providers. He previously served as the General Counsel and Corporate Secretary at NextG Networks through its sale to Crown Castle in 2012. In addition, Anthony was a Senior Vice President and Associate General Counsel with American Tower Corporation from 2001 to 2011. Mr. Lehv began his career as an attorney in private practice in Washington, D.C. representing telecommunications and media companies. Mr. Lehv received his JD summa cum laude from The American University Washington College of Law and his BA in History from the University of Michigan.

EXHIBIT J

Description of Applicant's Ownership Structure

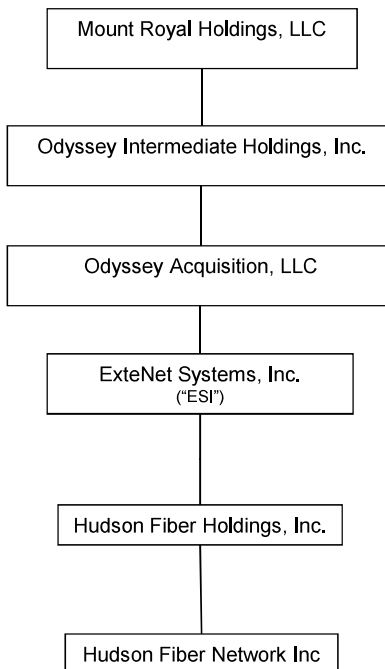
Applicant is a direct, wholly owned subsidiary of Hudson Fiber Holdings, Inc., which in turn is wholly owned by ExteNet Systems, Inc. ("ESI"). ESI is a privately held Delaware corporation and a direct, wholly owned subsidiary of Odyssey Acquisition, LLC ("Odyssey"), a Delaware limited liability company. Odyssey is an indirect, wholly owned subsidiary of Mount Royal Holdings, LLC ("Parent"), a Delaware limited liability company. Parent has executive offices located at 750 Park of Commerce Drive, Suite 200, Boca Raton, Florida 33487. Parent has no majority owner, but rather is owned by multiple private equity firms and certain individuals in management of ESI.

A chart depicting Applicant's ownership is attached as Exhibit J-1.

EXHIBIT J-1

Ownership Structure of Applicant Chart

Organization Chart*



All ownership percentages depicted are 100%.

* The entities listed herein include only those entities that (1) hold authorization to provide intrastate telecommunications services in this jurisdiction or (2) are in the chain of ownership of those entities. The chart excludes all other subsidiaries of ESI.

EXHIBIT K

Similar Operations in Other States

Applicant is currently authorized to provide intrastate telecommunications service in the District of Columbia, Florida, Georgia, Indiana, Illinois, Kentucky, Louisiana, Michigan, Missouri, New Jersey, Nevada, New York, and Rhode Island. At this time, Applicant is in the process of seeking authorization to provide intrastate telecommunications services in the following jurisdictions: California, Connecticut, Massachusetts, Maryland, Minnesota (pending), North Carolina (pending), Ohio, Oklahoma (pending), Pennsylvania (pending), Tennessee, Utah, Virginia, Washington, and Wisconsin.

Applicant has six affiliates that provide telecommunications services, including: ExteNet Systems, Inc., ExteNet Systems (Virginia) LLC, ExteNet Systems (California) LLC, ExteNet Asset Entity, LLC, and Telecommunications Properties, LLC. Collectively, Applicant's affiliates currently hold authorizations to provide intrastate telecommunications services in the District of Columbia and every state except Alaska, Iowa, Maine, Montana, North Dakota, Vermont, and Wyoming. Applicant's affiliates are authorized to provide telecommunications services in the following states:

Subsidiary	Authorized Jurisdiction(s)
ExteNet Systems, Inc.¹	Alabama, Arizona, Arkansas, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin

¹ ExteNet Systems, Inc. currently has an application pending in California.

ExteNet Systems (Virginia) LLC	Virginia
ExteNet Systems (California) LLC	California
ExteNet Asset Entity, LLC²	Delaware, District of Columbia, Florida, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Missouri, New Jersey, New York, Nevada, Pennsylvania, Tennessee, Rhode Island, Virginia, Washington, Wisconsin
Telecommunications Properties, LLC	Kentucky, Texas

Applicant has not been denied requested certification in any jurisdiction, nor has any permit, license, or certificate been suspended or permanently revoked by any authority.

² ExteNet Asset Entity, LLC ("EAE") is in the process of seeking authorization to provide telecommunications services in the following jurisdictions: Arizona, Oklahoma, and Pennsylvania. EAE also plans to seek certification in North Carolina and Utah.

EXHIBIT L

Accounting Statement

Applicant maintains its books in accordance with Generally Accepted Accounting Principles (“GAAP”). As a competitive provider, Applicant is not subject to Federal Communications Commission accounting requirements.

EXHIBIT M

Derivation of Rates

Applicant's rates will be derived through individually negotiated contracts with its customers. The rates are based on each customer's needs and Applicant's costs to provide each customer's services. Applicant's services typically do not require Applicant to purchase services or network elements through interconnection agreements, retail tariffs or resale tariffs.

EXHIBIT N

Interconnection and Resale Statement

Applicant does not intend to provide services that require an interconnection agreement at this time. Accordingly, Applicant has not entered into negotiations for an interconnection agreement.

Applicant does not currently have an approved resale agreement.

EXHIBIT O

Notarized Affidavit Regarding Interconnection Negotiations

NOT APPLICABLE

Applicant does not intend to provide services that require an interconnection agreement at this time. Accordingly, Applicant has not entered into negotiations for an interconnection agreement.

EXHIBIT P

Sample Customer Bill and Disconnection Notice

A sample customer bill and disconnection notice are attached as Exhibit P-1 and Exhibit P-2, respectively.

EXHIBIT P-1

Sample Customer Bill



☐ Check here for change of address (note changes below)

[Redacted Address]

Account Number	Invoice Date	Total Amount Due
[Redacted]	March 01, 2019	\$1,022.20
Invoice Number	Date Due	Amount Enclosed
40685447	March 15, 2019	

Hudson Fiber Network
ATTN: Accounts Payable
12 N State Rt 17
Suite 120
Paramus, NJ 07652



Summary of Charges

BALANCE INFORMATION

PREVIOUS BALANCE DUE:		\$1,022.20
PAYMENTS RECEIVED THRU	2/28/19	\$-1,022.20
ADJUSTMENTS:		\$0.00

PAST DUE BALANCE **\$0.00**

NEW CHARGES

MONTHLY SERVICE CHARGES	\$950.00
FINANCE CHARGES:	\$0.00
TAXES, REGULATORY AND SURCHARGES	\$72.20

TOTAL NEW CHARGES **\$1,022.20**

Account Number	Invoice Date	Total Amount Due
[Redacted]	March 01, 2019	\$1,022.20

Important Messages

Thank you for choosing Hudson Fiber Network!

We Appreciate Your Business.

Contact Us

Billing : (888) HFN - 4573
E-mail : Billing@hudsonfiber.com
Support : (888) HFN - 3690
Web site: www.hudsonfiber.com



Account Number : [REDACTED]

Invoice: 40685447

Summary Of Charges

ACCOUNT	NAME	CITY / STATE	CHARGES AND TAXES	ADJUST	SUB-TOT
[REDACTED]	[REDACTED]	Jersey City, NJ	\$1,022.20	\$0.00	\$1,022.20
Subtotal			\$1,022.20	\$0.00	\$1,022.20
Totals			\$1,022.20	\$0.00	\$1,022.20



Account Number : [REDACTED]

Invoice: 40685447

Summary of Activity**Monthly**

Period From	Period To	Description	Amount
04/01/2019	04/30/2019	MRC: 1592-5296 / DEDICATED INTERNET / 100 MB / [REDACTED] NORTH BERGEN, NJ / HFN00059	\$950.00
<u>CHARGES SUBTOTAL</u>			\$950.00
<u>SUMMARY OF TAXES AND SURCHARGES</u>			\$72.20
Total - Current Charges			\$1,022.20

Payments and Adjustments

DESCRIPTION	AMOUNT
Ck# 631917	-1,022.20
Subtotal	-\$1,022.20



Account Number : [REDACTED]

Invoice: 40685448

Summary of Activity**Monthly**

Period From	Period To	Description	Amount
04/01/2019	04/30/2019	MRC: 1592-5296 / DEDICATED INTERNET / 100 MB / [REDACTED] NORTH BERGEN, NJ / HFN00059	\$950.00
<u>CHARGES SUBTOTAL</u>			\$950.00
<u>SUMMARY OF TAXES AND SURCHARGES</u>			\$72.20
Total - Current Charges			\$1,022.20

Payments and Adjustments

DESCRIPTION	AMOUNT
Subtotal	\$0.00

Taxes and Surcharges Details

<u>Jurisdiction</u>	<u>Amount</u>
Subtotal	
Cost Recovery Fee	\$28.50
Regulatory Cost Recovery Fee	\$3.32
Property Surcharge Fee	\$40.38
Total Taxes And Surcharges	\$72.20

EXHIBIT P-2

Sample Customer Disconnection Notice



Contact Name
Sample Company
123 Sample Street
Sample City, Sample ST. 00000

Regarding: **Notice of Default**

This letter serves to advise you of Sample's payment default with Hudson Fiber Network.

Your account, A### is delinquent.

Our attempts to amicably resolve the past-due status of your account have been unsuccessful and we now find it necessary to exercise certain remedies provided under the terms of our Master Service Agreement.

WE HEREBY DEMAND THE PAST DUE PAYMENT OF \$35,472.50 plus applicable taxes and fees.

Accordingly, please be advised that in the event of failure to cure payment default within 30 days, we will Suspend, Disconnect your service and Declare your Master Service Agreement to be in Default and Accelerate all future, current and past due obligations to become Immediately Due and Payable.

Hudson Fiber Network will pursue all available remedies under the Master Service Agreement, up to and including any Early Termination Liability obligations plus, applicable taxes and fees. Crown Castle will be entitled to recover late payment interest and other collection costs, including reasonable attorney fees, which is in addition to any rights afforded to Crown Castle under law.

Remit To
Hudson Fiber Network
ATTN: Accounts Payable
12 N State Rt 17
Suite 120
Paramus, NJ 07652

Remit payment along with remittance advice to above address for the following transactions

Transaction	Account	Bill To	Due Date	Original Amount	Current Amount	Finance Charge
111	A###	A###-B###	1/30/2019	\$17,500.00	\$17,657.50	\$157.50
222	A###	A###-B###	2/30/2019	\$17,500.00	\$17,815.00	\$315.00

Thank you for your prompt attention.

Contact Us

Billing: (888) HFN-4573
E-mail: billing@hudsonfiber.com
Support: (888) HFN-3690
Website: www.hudsonfiber.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/5/2019 1:22:33 PM

in

Case No(s). 19-1743-TP-ACE

Summary: Application Application to Provide Telecommunications Services Throughout the State of Ohio electronically filed by Ms. Patricia C Cave on behalf of Hudson Fiber Network Inc.