



May 16, 2017
Via Web Filing

Ms. Betty McCauley, Commission Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

**RE: Legacy Long Distance International, Inc.- Application for Authority to Provide
Interexchange Services throughout the State of Ohio.
Case No. 17-1268-TP-ACE**

Dear Ms. McCauley:

Enclosed for filing please find the original of the Application for Authority to Provide Interexchange Services throughout the State of Ohio submitted on behalf of Legacy Long Distance International, Inc under the above-referenced case number.

The Company's financials will be filed under seal by local counsel in a separate filing.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R. Warren

Sharon R. Warren
Consultant to Legacy Long Distance International, Inc.

cc: Rafael Quinto (Via Email) - Legacy
tms: OHx1701

Enclosures
SW/cc

The Public Utilities Commission of Ohio
TELECOMMUNICATIONS FILING FORM

(Effective: 9/2/2015)

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.

<u>In the Matter of the Application of Legacy Long Distance</u>)	TRF Docket No. <u>90-</u>
<u>International, Inc. d/b/a Legacy Inmate Communications to</u>)	Case No. <u>17-1268-TP-ACE</u>
<u>Provide Competitive Telecommunications Services</u>)	NOTE: Unless you have reserved a Case #, leave the
<u>Throughout the State of Ohio</u>)	"Case No" fields BLANK.

Name of Registrant(s)	<u>Legacy Long Distance International, Inc.</u>		
DBA(s) of Registrant(s)	<u>Legacy Inmate Communications</u>		
Address of Registrant(s)	<u>10833 Valley View Street, Suite 150, Cypress, CA 90630</u>		
Company Web Address	<u>www.legacyinmate.com</u>		
Regulatory Contact Person(s)	<u>Rafael Quinto</u>	Phone: <u>1-800-577-5534 x 208</u>	Fax: <u>1-800-700-1116</u>
Regulatory Contact Person's Email Address	<u>rquinto@legacyinmate.com</u>		
Contact Person for Annual Report	<u>Rafael Quinto</u>	Phone	<u>1-800-577-5534 x 208</u>
Address (if different from above)			
Consumer Contact Information		Phone	<u>1-800-577-5534 x 208</u>
Address (if different from above)			
Motion for protective order included with filing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Motion for waiver(s) filed affecting this case?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No [Note: Waivers may toll any automatic timeframe.]		

Notes:

Section I and II are Pursuant to Chapter 4901:1-6 OAC

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

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 Administrative Code Section 4901 and/or the supplemental application form noted.
- (3) Information regarding the number of copies required by the Commission may be obtained from the Commission's web site 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 Commission.
- (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)	<input type="checkbox"/> For Profit ILEC	<input type="checkbox"/> Not For Profit ILEC	<input type="checkbox"/> CLEC
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</u> <u>(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)
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 <u>1-6-08</u> * (Auto 30- day)	<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 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 Commission Web Page.

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 Commission's Web Page 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 day)	<input type="checkbox"/> ATA <u>1-7-14</u> (Auto 30 day)
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.	<input type="checkbox"/> ATA <u>1-3-04</u> (Auto 30 days)	
Wireless Providers See <u>4901:1-6-24</u>	<input type="checkbox"/> RCC [Registration & Change in Operations]	<input type="checkbox"/> NAG [Interconnection Agreement or

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, Legacy Long Distance International, Inc. and am authorized to make this statement on its behalf.

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 Rule 4901:1-6-7, Ohio Administrative Code.

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

Executed on May 16, 2017 at Maitland, FL 32751

/s/Sharon R. Warren*

Consultant to Legacy Long Distance International, Inc.

May 16, 2017

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, Sharon R. Warren, 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.

/s/Sharon R. Warren*

Consultant to Legacy Long Distance International, Inc.

May 16, 2017

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.*

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**

Or

Make such filing electronically as directed in Case No 06-900-AU-WVR

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)
Legacy Long Distance International, Inc.)
Interexchange Services Throughout the State of Ohio)

Case No. 17 - 268 - TP - ACE

Name of Registrant(s) Legacy Long Distance International, Inc.
DBA(s) of Registrant(s) Legacy Inmate Communications
Address of Registrant(s) 10833 Valley View Street, Suite 150, Cypress, CA 90630

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)

- | | | |
|--|---|---------------------------------------|
| <input checked="" type="checkbox"/> Interexchange Tariff | <input type="checkbox"/> Local Tariff | <input type="checkbox"/> CESTC Tariff |
| | <input type="checkbox"/> Carrier-to-Carrier (Access) Tariff | |

Description of Services

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Service provisioned via Resale | <input type="checkbox"/> Service provisioned via Facilities | <input type="checkbox"/> Both Resold and Facilities-based |
| <input checked="" type="checkbox"/> Description of Proposed Services | <input checked="" type="checkbox"/> Statement about the provision of CTS services | <input checked="" type="checkbox"/> Description of the general geographic area served |
| <input checked="" type="checkbox"/> Explanation of how the proposed services in the proposed market area are in the public interest. | <input checked="" type="checkbox"/> 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 90-5894

- ☒ 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 Legacy Long Distance International, Inc.

(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 May 16, 2017

at Maitland, Florida

/s/Sharon R. Warren, Consultant to Legacy Long Distance International, Inc.
(Signature and Title)

May 16, 2017
(Date)

LIST OF EXHIBITS

Exhibit 1	-	Proposed Institutional Services Tariff
Exhibit 2	-	Description of Services
Exhibit 3	-	Description of Proposed Market Area
Exhibit 4	-	Public Interest Statement
Exhibit 5	-	Customer Class
Exhibit 6	-	Evidence of Registration with DOR
Exhibit 7	-	Ohio SOS Certificate and Certificate of Good Standing
Exhibit 8	-	Financial Viability
Exhibit 9	-	Financial Statements
Exhibit 10	-	Financial Documentation
Exhibit 11	-	Technical and Managerial Expertise
Exhibit 12	-	Contact Information
Exhibit 13	-	Corporate Structure
Exhibit 14	-	Operations in Other States
Exhibit 15	-	Verification of Maintenance of Telephony Records
Exhibit 16	-	Verification of Affiliate Transaction Requirements
Exhibit 17	-	Advance Payments
Exhibit 18	-	Customer Bill and Disconnect Notice
Exhibit 19	-	Sample Application Form

EXHIBIT 1

LEGACY LONG DISTANCE INTERNATIONAL, INC.
d/b/a Legacy Inmate Communications

PROPOSED INSTITUTIONAL SERVICES TARIFF

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 Legacy Long Distance International, Inc.

Company Address 10833 Valley View Street, Suite 150, Cypress, CA 90630

Company Web Address www.legacyinmate.com

Regulatory Contact Person Rafael Quinto Phone (800) 577-5534 Fax (800) 700-1116

Regulatory Contact Person's Email Address rquinto@legacyinmate.com

Contact Person for Annual Report Rafael Quinto Phone (800) 577-5534 Fax (800) 700-1116

Consumer Contact Information Rafael Quinto Phone (800) 577-5534 Fax (800) 700-1116

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) Inmate Operator Service

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 an officer/agent of the carrier/telephone company, Sharon R. Warren , 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.

/s/ Sharon R. Warren
(Signature and Title)

May 16, 2017
(Date)

TITLE SHEET

P.U.C.O. 1

Legacy Long Distance International, Inc.
d/b/a Legacy Inmate Communications

The Customer may view the Detariffed/Nonregulated Services not included in this tariff on the Company's website at:

www.golegacy.com

This tariff contains the descriptions, regulations, and rates applicable to the furnishing of interexchange telecommunications services provided by Legacy Long Distance International, Inc. within the State of Ohio. This tariff is on file with the Public Utilities Commission of Ohio. Copies may be inspected during normal business hours at the Company's principal place of business.

This tariff is in compliance with Rule 4901:1-6, O.A.C.C.

SECTION 1 - INSTITUTIONAL SERVICES

1.1 Institutional Operator Assisted Calling

1.1.1 General

Institutional operator assisted service allows Inmates to place Collect Calls through an automated call processing system. The call processing system prompts the Inmate and the called party such that the call is completed without live operator assistance. Calls are placed on a collect-only basis to the called party.

A number of special blocking and screening capabilities are available with institutional operator services provided by Legacy. These capabilities allow Institutions to control Inmate access to telecommunications services, reduce fraudulent use of the Company's services, and eliminate harassing calls to persons outside the Institution.

For services provided to Inmates of Institutions, the following special conditions apply:

- A Calls to "900", "976" or other pay-per-call services are blocked by Legacy.
- B At the request of the Institution, Legacy may block inmate access to toll-free numbers (e.g., 800, 888) and dialing sequences used to access other carriers or operator service providers (e.g., 950-XXXX, 10XXXX).
- C At the request of the Institution, Legacy may block Inmate access to "911", "411", or local operators reached through "0-" dialing.
- D At the request of the Institution, Legacy may block Inmate access to specific telephone numbers.
- E Availability of Legacy's service may be restricted by the Institution to certain hours and/or days of the week.
- F At the request of the Institution, no notices or signage concerning the Company's services will be posted with its instruments. Information concerning Legacy's services is provided to the administration of each Institution where the Company's services are offered. Inmates may obtain information regarding rates and charges by requesting such information from the Institution's administration.
- G At the request of the Institution, Legacy may impose time limits on local and long distance calls placed using its services.
- H At the request of the Institution, equipment may be provided which permits monitoring of inmate calls by legally authorized government officials.

SECTION 1 - INSTITUTIONAL SERVICES (CONT'D.)

1.1 Institutional Operator Assisted Calling (Cont'd.)

1.1.2 IM-1*

A. Per Minute Rates

Rate per minute	\$0.36
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* Pursuant to FCC Docket 12-375, the revisions shown above are effective June 20, 2016 for Jails.

1.2 Ancillary Service Charges

1.2.1 Automated Payment Fees (where available) – Credit Card payment, debit card payment, and bill processing fees, including fees for payments made by interactive voice response (IVR), web, or kiosk (where available).

Automated payment fees	\$3.00
------------------------	--------

1.2.2 Live Agent Fee – A fee associated with the optional use of a live operator to complete Inmate Calling Services transactions.

Live Agent Fee	\$5.95
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1.2.3 Paper Bill/Statement Fees – Fees associated with providing customers of Inmate Calling Services an optional paper billing statement.

Paper Bill/Statement Fees	\$2.00
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Issued: May XX, 2017

Effective: May YY, 2017

Issued by:

Mr. Curtis Brown, President
10833 Valley View Street, Suite 150
Cypress, California 90630

EXHIBIT 2

LEGACY LONG DISTANCE INTERNATIONAL, INC. d/b/a Legacy Inmate Communications

DESCRIPTION OF SERVICES

Legacy proposes to offer collect, automated collect and prepaid calling services to inmates and other incarcerated persons in confinement institutions throughout the state of Ohio. Applicant also provides alternative operator services to payphones, hospitals, hotels and other aggregator locations. Legacy operates as a switchless reseller and as such relies upon its underlying carriers for the operation and ongoing maintenance of network transmission facilities. The applicant's underlying carriers provide all aspects of call completion, including switching, routing and termination of calls. Legacy does not offer presubscribed services.

All Services that remain subject to tariffing under the Ohio Administrative Code are included in the tariff included as Exhibit 1.

EXHIBIT 3

LEGACY LONG DISTANCE INTERNATIONAL, INC. d/b/a Legacy Inmate Communications

DESCRIPTION OF PROPOSED MARKET AREA

Legacy proposes to offer collect, automated collect and prepaid calling services to inmates and other incarcerated persons in confinement institutions throughout the state of Ohio. Applicant also provides alternative operator services to payphones, hospitals, hotels and other aggregator locations. Legacy operates as a switchless reseller and as such relies upon its underlying carriers for the operation and ongoing maintenance of network transmission facilities. The applicant's underlying carriers provide all aspects of call completion, including switching, routing and termination of calls.

EXHIBIT 4

LEGACY LONG DISTANCE INTERNATIONAL, INC. d/b/a Legacy Inmate Communications

EXPLANATION OF HOW THE PROPOSED SERVICES IN THE PROPOSED MARKET AREA ARE IN THE PUBLIC INTEREST

The Applicant's provision of service is targeted to inmates and other incarcerated persons in confinement institutions as well as transient end users. Grant of this Application would serve the public interest by expanding the availability of competitive telecommunications services in these areas in the State of Ohio. Moreover, as demonstrated in the Application and Exhibits, Applicant is financially and technically qualified to provide telecommunications services in Ohio.

Grant of this Application will also allow Applicant to compete effectively in order to offer the latest services and technologies at levels meeting or exceeding those currently offered by other competitive providers in Ohio.

Further, as demonstrated above, the approval of this Application will provide significant benefits to consumers in the state of Ohio in terms of carrier choice, price, increased reliability, responsiveness and the introduction of new services.

Accordingly, grant of this Application would be in the public interest for the reasons stated above.

EXHIBIT 5

LEGACY LONG DISTANCE INTERNATIONAL, INC. d/b/a Legacy Inmate Communications

DESCRIPTION OF THE CLASS OF CUSTOMERS THAT THE APPLICANT INTENDS TO SERVICE

Legacy proposes to offer collect, automated collect and prepaid calling services to inmates and other incarcerated persons in confinement institutions throughout the state of Ohio. Applicant also provides alternative operator services to payphones, hospitals, hotels and other aggregator locations. Legacy operates as a switchless reseller and as such relies upon its underlying carriers for the operation and ongoing maintenance of network transmission facilities. The applicant's underlying carriers provide all aspects of call completion, including switching, routing and termination of calls. Legacy does not offer presubscribed services.

EXHIBIT 6

LEGACY LONG DISTANCE INTERNATIONAL, INC.
d/b/a Legacy Inmate Communications

EVIDENCE OF REGISTRATION WITH THE OHIO DEPARTMENT OF TAXATION



May 16, 2017
Via U.S. Mail

Ohio Department of Taxation
Care of: Public Utilities Section
21st Floor
30 East Broad Street
Columbus, Ohio 43266-0420

Dear Sir/Madam:

Please be advised that Legacy Long Distance International, Inc. has applied for certification by the Public Utilities Commission of Ohio to operate as a provider of long distance telecommunications services in the State of Ohio.

All official correspondence should be addressed to:

Rafael Quinto, Director of Operations
Legacy Long Distance International, Inc.
10833 Valley View Street, Suite 150
Cypress, CA 90630
Telephone: 800-577-5534
Facsimile: 800-700-1116

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

Sharon R. Warren
Consultant to Legacy Long Distance International, Inc.

cc: R. Quinto - Legacy
file: Legacy- OH Local

SW/mp

EXHIBIT 7

**LEGACY LONG DISTANCE INTERNATIONAL, INC.
d/b/a Legacy Inmate Communications**

**OHIO SECRETARY OF STATE CERTIFICATION
&
CERTIFICATE OF GOOD STANDING**

(db9)



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
05/19/2014	201413901270	FICTITIOUS NAME/ORIGINAL FILING (NFO)	50.00	0.00	0.00	0.00	0.00

Receipt

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

LEGACY LONG DISTANCE INTERNATIONAL, INC.
ATTN: RAFAEL G QUINTO
10833 VALLEY VIEW ST, STE 150
CYPRESS, CA 90630

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, Jon Husted
2296331

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

LEGACY INMATE COMMUNICATIONS

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

Document(s)

FICTITIOUS NAME/ORIGINAL FILING

Effective Date: 05/19/2014

Document No(s):

201413901270

Expiration Date: 05/19/2019

LEGACY LONG DISTANCE INTERNATIONAL, INC.
10833 VALLEY VIEW ST
STE 150
CYPRESS, CA 90630



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
19th day of May, A.D. 2014.

Ohio Secretary of State

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

I, Jon Husted, 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 LEGACY LONG DISTANCE INTERNATIONAL, INC., a California corporation, having qualified to do business within the State of Ohio on September 21, 1999 under License No. 1102921 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 16th day of May, A.D. 2017.*

A handwritten signature in cursive script that reads "Jon Husted".

Ohio Secretary of State

Validation Number: 201713602128

EXHIBIT 8

LEGACY LONG DISTANCE INTERNATIONAL, INC. d/b/a Legacy Inmate Communications

EXECUTIVE SUMMARY OF FINANCIAL INFORMATION

Legacy Long Distance International, Inc. has access to the financing and capital necessary to conduct its telecommunications operations as specified in this Application. The Applicant's financial strength and ability to offer the above services is demonstrated in the Applicant's Financial Statements.

EXHIBIT 9

**LEGACY LONG DISTANCE INTERNATIONAL, INC.
d/b/a Legacy Inmate Communications**

FINANCIAL STATEMENTS

The Company's financial statements are being filed under seal as Confidential by local counsel.

Legacy Long Distance
Income Statement
01/01/2016 to 12/31/2016

January 01, 2016
December 31, 2016

Income

Long Distance Service Revenues

A table with 10 rows of redacted data, each row containing a single blacked-out value.

TOTAL Legacy Service Revenues

A table with 4 rows of redacted data, each row containing a single blacked-out value.

TOTAL Income

NET INCOME

Cost of Goods Sold

Network operating expenses

A table with 12 rows of redacted data, each row containing a single blacked-out value.

TOTAL Network Operating Expense

A table with 14 rows and 2 columns of redacted data, each cell containing a single blacked-out value.

January 01, 2016
December 31, 2016

	December 31, 2016		December 31, 2017		December 31, 2018
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL Operations Expenses	[REDACTED]		[REDACTED]		[REDACTED]
TOTAL Cost of Goods Sold	[REDACTED]		[REDACTED]		[REDACTED]
GROSS PROFIT	[REDACTED]		[REDACTED]		[REDACTED]

Expenses

Operations expenses

[illegible]

January 01, 2016

December 31, 2016

[REDACTED]

TOTAL Operations expenses

Business Development/Services Expenses

[REDACTED]

TOTAL Business Services/Development Expenses

IT Expenses

[REDACTED]

TOTAL IT Expenses

Network Maintenance

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

January 01, 2016

December 31, 2016

[REDACTED]

[REDACTED]

TOTAL Network Maintanance

General and Administrative

[REDACTED]

[REDACTED]

TOTAL General and Admin

Depreciation and Amortization

TOTAL Expenses

[REDACTED]

	January 01, 2016	December 31, 2016
OPERATING PROFIT		
Other Income & Expenses		
TOTAL Other Income & Expenses		
PROFIT BEFORE TAXES		
Provisions for Taxes		
TOTAL Provisions for Taxes		
NET PROFIT		

As of: December 31, 2016

Current Assets

100

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[REDACTED]

██████████

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□ ☐ ☐

Current Liabilities

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

For the purpose of this study, the following hypotheses were formulated:

TOTAL LIABILITIES

CAPITAL

Common Stock

Retained earnings (accum def).

Year-to-Date Earnings

TOTAL CAPITAL

TOTAL LIABILITIES & CAPITAL

EXHIBIT 10

LEGACY LONG DISTANCE INTERNATIONAL, INC.

DOCUMENTATION TO SUPPORT CASH AND FUNDING SOURCES

Please refer to Exhibit 9 for documentation supporting Legacy Long Distance International, Inc.'s Cash and Funding Sources.

EXHIBIT 11

LEGACY LONG DISTANCE INTERNATIONAL, INC.

TECHNICAL AND MANAGERIAL EXPERTISE

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Profiles of Key Personnel

Curtis A. Brown, President

Prior to founding Legacy Long Distance International, Inc. ("LLDI") in September 1996, Curtis was President for Public Communications Network, Inc. (PCN). PCN was a start-up long distance service incorporated in August 1995. In a period of one year Mr. Brown successfully took \$150,000 of vested capital and built a company producing over \$1,500,000 its first year. Prior to working with PCN, Curtis acted as the General Manager of Operator Services/Director of Customer Services for Communications TeleSystems International (CTS). CTS is the 13th largest long distance provider in the United States. There he was responsible for all aspects of customer services, operator and network control operations, agent support, and all 0+ operations. During his tenure with CTS, Mr. Brown increased net revenues by over 680%.

George Hansell, Vice President of Sales

Mr. Hansell also comes to Legacy from PCN where he acted as the Residential and Commercial Sales Manager. Prior to joining the PCN team, George served as the Southern Region Materials and Sales Manager for Sharp Memorial Hospital. During his tenure at Sharp Memorial, Mr. Hansell was responsible for negotiating a national contract that saved the facility 1.5 million dollars annually in operational costs. His experience in Sales management is unsurpassed. George's concern for the customers' needs and his ability to communicate make him a valued asset to Legacy.

EXHIBIT 12

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Names, Addresses and Phone Numbers of Officers and Directors

The following individuals serve as officers and directors of Applicant and may be reached through the Applicant's corporate headquarters at 10833 Valley View Street, Suite 150, Cypress, CA 90630 Phone:800-577-5534.

The Company's officers and directors are as follows:

<u>Officers and Directors</u>	<u>Title</u>
Curtis A. Brown	President/Director
George Hansell	Vice President/Director
Rafael Quinto	Vice President of Operations
Esmail Nabavian	Finance Director

Listed below are the major stockholders of Legacy Long Distance International, Inc.

<u>Stockholder</u>	<u>Percentage of Shares</u>
Curtis A. Brown	74.29 %
George Hansell, Jr.	17.74 %

EXHIBIT 13

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Corporate Structure and Ownership Documentation

Legacy Long Distance International, Inc. is a California corporation incorporated on September 17, 1996.

The Company's corporate address is:

Legacy Long Distance International, Inc.
10833 Valley View Street, Suite 150
Cypress, CA 90630
Telephone: 800-577-5534
Facsimile: 800-700-1116
Toll-Free: 800-577-5534
Email: rquinto@legacyinmate.com

EXHIBIT 14

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Information Regarding Similar Operations in Other States

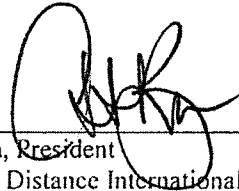
Legacy Long Distance International, Inc. is certified to provide telecommunications service in the following states: Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin and Wyoming.

EXHIBIT 15

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Verification of Maintenance of Telephony Records

I, Curtis Brown, President of Legacy Long Distance International, Inc., a California corporation, verify that Legacy Long Distance International, Inc. will maintain its local telephony records in accordance with Generally Accepted Accounting Principles ("GAAP"), as required by O.A.C. 4901:1-6-10(D)(4), adopted pursuant to PUCO Case No. 06-1345-TP-ORD.



Curtis Brown, President
Legacy Long Distance International, Inc.
10833 Valley View Street, Suite 150
Cypress, CA 90630
Telephone: 800-577-5534
Facsimile: 800-700-1116
Toll-Free: 800-577-5534
Email: cbrown@legacyinmate.com

Dated: _____

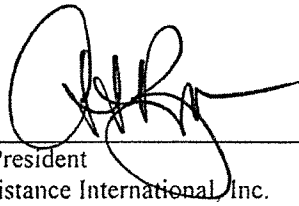
5/15/17

EXHIBIT 16

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Verification of Affiliate Transaction Requirements

I, Curtis Brown, President of Legacy Long Distance International, Inc., a California Corporation, verify that Legacy Long Distance International, Inc. will comply with all Affiliate Transaction Requirements set forth in O.A.C. 4901:1-6.



Curtis Brown, President
Legacy Long Distance International, Inc.
10833 Valley View Street, Suite 150
Cypress, CA 90630
Telephone: 800-577-5534
Facsimile: 800-700-1116
Toll-Free: 800-577-5534
Email: cbrown@legacyinmate.com

Dated: _____

5/15/17

EXHIBIT 17

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Advance Payments

The Company will not collect advance payments or deposits.

EXHIBIT 18

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Customer Bill and Disconnect Notice

The Company will comply with the FCC's truth-in-billing requirements and will include the notice required by 4901:1-6-17(B) of the PUCO rules. The Company has not yet developed a specific bill format for Ohio customers.

The Company will comply with all applicable rules concerning customer disconnections. It has not developed a specific disconnection notice for Ohio.

EXHIBIT 19

LEGACY LONG DISTANCE INTERNATIONAL, INC.

Sample Application Form to Establish Residential Service

Not Applicable. The Company does not intend to offer residential service.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/16/2017 3:48:22 PM

in

Case No(s). 17-1268-TP-ACE

Summary: Application For Authority to Provide Interexchange Services throughout the State of Ohio electronically filed by Ms. Margeaux Pennywell on behalf of Legacy long Distance International, Inc.