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July 9, 2019

VIA ELECTRONIC FILING

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

Re: IRU Networks, LLC
Case No. 19-1350-TP-ACE

Dear Sir or Madam:

IRU Networks, LLC, by its attorneys, respectfully submits the following responses to the Data Request dated July 8, 2019 regarding the above-referenced case.

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

Respectfully submitted,

/s/ Barbara Bison Jacobson

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

**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;
Response to Application Data Request**

IRU NETWORKS, LLC RESPONSES

IRU Networks, LLC (“IRU”) hereby provides the following responses to Application Data Request, Questions 1-3 (the “Requests”) issued on July 8, 2019. IRU’s responses to the Requests are based on the best information presently available and only include data applicable to IRU’s operations in Ohio unless otherwise stated. IRU reserves the right to amend, supplement, correct, or clarify any response provided herein if other or additional information is obtained. IRU’s specific responses are below.

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Staff Data Request 1:

Telecommunications Supplemental Application Form for Carrier Certification- Please review this form to complete the following sections: Documentation attesting to the applicant's proposed interactions with other Carriers and Documentation attesting to the applicant's proposed interactions with customers.

IRU's Response to Staff Data Request 1:

Please see attached revised Telecommunications Supplemental Application Form for Carrier Certification sections: Documentation attesting to the applicant's proposed interactions with other Carriers and Documentation attesting to the applicant's proposed interactions with customers. Documents asserting to information checked was submitted with the original filing.

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.

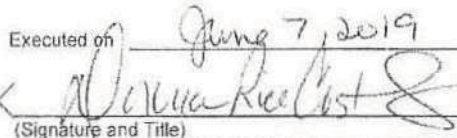
Documentation attesting to the applicant's proposed interactions with Customers

- ☒ 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 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
 CFO
(Signature and Title)

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

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Staff Data Request 2:

Exhibit A and Exhibit B states that the Applicant intends to offer local exchange service in the areas served by AT&T Ohio and Frontier North Inc., however, Exhibit B states the Applicant intends to only offer service in the area served by AT&T Ohio. If the Applicant intends to offer service in the areas served by both ILECs revise Exhibit B and revise the list of ILEC Exchanges the Applicant intends to serve.

IRU's Response to Staff Data Request 2:

Attached please find amended Exhibit A reflecting AT&T Ohio only.

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 interexchange service throughout the State.

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Staff Data Request 3:

Exhibit F- Please provide a current Certificate of Good Standing for Ohio. The one provided with this application is from Oklahoma.

IRU's Response to Staff Data Request 3:

Please see attached IRU's Certificate of Good Standing for Ohio.

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 IRU NETWORKS, LLC, an Oklahoma For Profit Limited Liability Company, Registration Number 4338955, filed on May 21, 2019, is currently in FULL FORCE AND EFFECT upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 8th day of July, 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: 201918904628

This foregoing document was electronically filed with the Public Utilities

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in

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

Summary: Response IRU Networks, LLC's Responses for Data Request dated July 8, 2019 in connection with the Application to provide Resold Local and Interexchange Services throughout the state of Ohio electronically filed by Lance Steinhart on behalf of IRU Networks, LLC