

*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 AMCS Network Services

) TRF Docket No. 90 -

) Case No. - **TP** -

to Provide Telecommunications Services in the State of Ohio

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

Name of Registrant(s) AMCS Network Services LLC (AMCS LLC)

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

Address of Registrant(s) 4250 N. Fairfax Drive, 13th Floor, Arlington, VA 22203

Company Web Address \_\_\_\_\_

Regulatory Contact Person(s) Tiki Gaugler

Phone 703-344-9122

Fax \_\_\_\_\_

Regulatory Contact Person's Email Address tgaugler@amazon.com

Contact Person for Annual Report Tiki Gaugler

Phone 703-344-9122

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

Consumer Contact Information \_\_\_\_\_

Phone \_\_\_\_\_

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

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

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

**Notes:**

Section I and II are Pursuant to Ohio Administrative Code [4901:1-6](#).

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

Section IV – Attestation.

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

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

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

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

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

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

## Section I – Part I - Common Filings

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

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

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

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

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

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

Certification	ILEC (Out of territory)	CLEC	Telecommunications Service Provider Not Offering Local	CESTC	CETC
* See Supplemental form	<input type="checkbox"/> ACE <a href="#">1-6-08</a> * (Auto 30- day)	<input type="checkbox"/> ACE <a href="#">1-6-08</a> *(Auto 30 day)	<input checked="" type="checkbox"/> ACE <a href="#">1-6-08</a> *(Auto 30 day)	<input type="checkbox"/> ACE <a href="#">1-6-10</a> (Auto 30 day)	<input type="checkbox"/> UNC <a href="#">1-6-09</a> *(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 <a href="#">1-6-26</a> (Auto 30 days)	<input type="checkbox"/> ABN <a href="#">1-6-26</a> (Auto 30 days)
Change of Official Name *	<input type="checkbox"/> ACN <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> ACN <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Change in Ownership *	<input type="checkbox"/> ACO <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> ACO <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Merger *	<input type="checkbox"/> AMT <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> AMT <a href="#">1-6-29(E)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Transfer a Certificate *	<input type="checkbox"/> ATC <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> ATC <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (0 day Notice)
Transaction for transfer or lease of property, plant or business *	<input type="checkbox"/> ATR <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> ATR <a href="#">1-6-29(B)</a> (Auto 30 days)	<input type="checkbox"/> CIO <a href="#">1-6-29(C)</a> (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 <a href="#">1-7-07</a> (Auto 90 day)	<input type="checkbox"/> NAG <a href="#">1-7-07</a> (Auto 90 day)
Request for Arbitration	<input type="checkbox"/> ARB <a href="#">1-7-09</a> (Non-Auto)	<input type="checkbox"/> ARB <a href="#">1-7-09</a> (Non-Auto)
Introduce or change c-t-c service tariffs	<input type="checkbox"/> ATA <a href="#">1-7-14</a> (Auto 30 days)	<input type="checkbox"/> ATA <a href="#">1-7-14</a> (Auto 30 days)
Request rural carrier exemption, rural carrier suspension or modification	<input type="checkbox"/> UNC <a href="#">1-7-04</a> 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 <a href="#">1-3-04</a> (Auto 60 days)	
Wireless Providers See <a href="#">4901:1-6-24</a>	<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, \_\_\_\_\_, 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 11/12/2019

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

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

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

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

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

(Effective: 01/20/2011)

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

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

In the Matter of the Application of AMCS Network Services LL (AMCS LLC)  
to Provide Telecommunications Services in the State of Ohio

Case No. \_\_\_\_\_ - \_\_\_\_\_ - **TP** - \_\_\_\_\_

Name of Registrant(s) AMCS Network Services LL (AMCS LLC)

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

Address of Registrant(s) 4250 N. Fairfax Drive, 13th Floor, Arlington, VA 22203

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

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

**List of Required Exhibits**

Tariffs: (Include all that apply)

☐ Interexchange Tariff

☐ Local Tariff

☐ CESTC Tariff

☐ Carrier-to-Carrier (Access) Tariff

**Description of Services**

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

☐ Service provisioned via Resale

☒ Service provisioned via Facilities

☐ Both Resold and Facilities-based

☒ Description of Proposed Services

☒ Statement about the provision of  
CTS services

☒ Description of the general  
geographic area served

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

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

**Business Requirements**

**Evidence of Registration with:**

☒ Ohio Department of Taxation

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

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

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

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

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

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

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

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

☒ Documentation indicating the applicant's corporate structure and ownership

☒ Information regarding any similar operations in other states.

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

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

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



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

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

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

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

**Affidavit**

I am an authorized representative of the applicant corporation AMCS Network Services LL (AMCS 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 \_\_\_\_\_

at \_\_\_\_\_



11/12/2019

(Signature and Title)

(Date)

*The Public Utilities Commission of Ohio*

In the Matter of the Application of AMCS  
Network Services LL (AMCS LLC) to  
Provide Telecommunications Services in the  
State of Ohio

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**LIST OF EXHIBITS**

Teresa Gaugler, Senior Corporate Counsel  
Denise Wood, Corporate Counsel  
AMCS LLC  
4250 N. Fairfax Drive  
13<sup>th</sup> Floor  
Arlington, VA 22203  
Telephone: (703) 344-9122  
E-mail: tgaugler@amazon.com  
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Michael Sloan (Washington DC)  
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505 Montgomery St., Suite 800  
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E-mail: zebzankel@dwt.com

*Counsel for AMCS Network Services LL (AMCS  
LLC)*

## **LIST OF EXHIBITS**

- 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 the general geographic area served
- Exhibit D      Explanation of how the proposed services in the proposed market area are in the public interest
- Exhibit E      Description of class of customers
- Exhibit F      Registration with Ohio Department of Taxation
- Exhibit G      Registration with Ohio Secretary of State & Certificate of Good Standing
- Exhibit H      Financial Viability
- Exhibit I      Managerial Ability and Corporate Structure
  - Exhibit I-1    Managerial Expertise
  - Exhibit I-2    Officers
  - Exhibit I-3    Corporate Structure
  - Exhibit I-4    Operations in other states
  - Exhibit I-5    Verification of compliance with FCC rules
- Exhibit J      Explanation of Rates
- Exhibit K      Interconnection and Resale
- Exhibit L      Sample copy of customer bill
- Exhibit M      Sample copy of disconnection notice



## **EXHIBIT A**

### **Description of Proposed Services**

AMCS Network Services LL (AMCS LLC) (“AMCS” or “Applicant”) plans to build a fiber-based, high-speed data transport telecommunications network in Ohio, to provide telecommunications services to business customers and for its own use. Applicant intends to provide services using its own facilities.

The Commission does not require tariffs for any of the proposed services. Further, the Applicant will not be providing retail services. However, Applicant provides the Telecommunications Retail Service Offering Form attached as Exhibit A-1, as required by the Commission’s procedures.

**EXHIBIT A-1**

**Telecommunications Retail Service Offering Form**

The Applicant will not be providing retail services, but the Applicant submits this form in order to comply with the Commission's requirements.

*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 AMCS Network Services LLC (AMCS LLC)

Company Address 4250 N. Fairfax Drive, 13th Floor, Arlington, VA 22203

Company Web Address \_\_\_\_\_

Regulatory Contact Person Tiki Gaugler Phone 703-344-9122 Fax \_\_\_\_\_

Regulatory Contact Person's Email Address tgaugler@amazon.com

Contact Person for Annual Report Tiki Gaugler Phone 703-344-9122 Fax \_\_\_\_\_

Consumer Contact Information Tiki Gaugler Phone 703-344-9122 Fax \_\_\_\_\_

TRF Docket No. -TP-TRF

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

☐ Non-BLES CLEC ☐ IXC ☒ Other (explain) high-speed data telecommunications service

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

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

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

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

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

**Part IV. – Attestation**


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

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I am an officer/agent of the carrier/telephone company, AMCS Network Services (AMCS LLC), 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)

11/12/2019  
(Date)

## **EXHIBIT B**

### **Statement about the provision of CTS Services**

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

## **EXHIBIT C**

### **Description of the general geographic area served**

AMCS intends to provide telecommunications services to various points throughout the state of Ohio.

## **EXHIBIT D**

### **Public Interest**

Grant of this Application will promote the public interest by expanding the availability of technologically advanced telecommunications services in Ohio. AMCS' entrance into the market will enhance competition for telecommunications and related services in Ohio, which will place downward pressure on rates while simultaneously encouraging innovation in developing services and efficiency in delivering existing services. AMCS' operations will be overseen by a well-qualified management team with substantial telecommunications experience and technical expertise and it will provide customers high quality, cost effective telecommunications services, with an emphasis on customer service.



## **EXHIBIT E**

### **Description of class of customers**

AMCS' customers will primarily be business customers.

**EXHIBIT F**

**Registration with Ohio Department of Taxation**

**EXHIBIT G**

**Registration with Ohio Secretary of State & Certificate of Good Standing**

## **EXHIBIT H**

### **Financial Viability**

AMCS possesses the requisite financial resources to provide telecommunications services in Ohio. For purposes of this Application, AMCS will rely on the financial statements of its ultimate parent company, Amazon.com, Inc. (“Amazon”), a publicly-traded Delaware corporation (NASDAQ: AMZN), to demonstrate its financial qualification to operate within Ohio. The most recent annual consolidated financial statements of Amazon, from Amazon’s most recent SEC Form 10-K is provided, available at: <https://ir.aboutamazon.com/sec-filings/sec-filing/10-k/0001018724-19-000004>. As shown in the financial statement, through Amazon, Applicant has sufficient capital resources and is financially qualified to operate within the State of Ohio.

## **EXHIBIT I**

### **Managerial Ability and Corporate Structure**

#### **I-1: Technical and Management Personnel**

AMCS has the requisite technical and managerial qualifications to provide telecommunications services in the State of Ohio. The Applicant's technical and managerial team is comprised of individuals with substantive experience in successfully managing and operating telecommunications businesses. Biographies of key personnel are included below:

##### **Mihir Patel**

Mihir Patel is Vice President of AMCS and Director of Global Capacity Delivery for Amazon Web Services. Mr. Patel has more than fifteen years of experience in the technology sector and currently manages a team of 200+ employees across multiple technical disciplines (Technical Program Managers, Business Development Managers, and Product Managers) focused on delivering data center capacity to assure we have power, land, fiber, and colocation when AWS needs it. In Mr. Patel's prior experience with AWS, he managed the delivery of new public commercial and private government region builds and technical operations of government regions. Mr. Patel has earned a Master's Degree in Software Engineering from Penn State University, Master of Business Administration from Texas A&M University, and a Bachelor's Degree in Management Information Systems from Temple University.

##### **Kristofer Ivarson**

In his current role, Mr. Ivarson serves as the manager of a metro fiber business development team responsible for designing, implementing, and acquiring key infrastructure to support Amazon Web Services as it expands into new international market segments. Previously, Mr. Ivarson was Customer Operations Director for Nokia Siemens and was responsible for optical transport products in the Americas. In this capacity, Mr. Ivarson's responsibilities include managing a team charged with all trials, deployment, and services related to fiber optic platforms. Earlier in his career at Nokia Siemens he worked as the Program director for the Nokia Siemens fiber to the curb deployment venture at a Canadian ILEC. Mr. Ivarson has dedicated over 20 years to serving and supporting the telecommunication needs of various companies. His operational knowledge and background in metro dark fiber are an asset to AMCS LLC.

##### **Brent Fontana**

Brent Fontana is currently Principal of Fiber Network Development for Amazon Web Services. Previously, he was the Director of Network Development & Strategy for the Zayo Group, and led Zayo Group's Dark Fiber Construction Services unit working with a variety of state, local federal public sector partners, including k-12 schools, first responders and other public anchor institutions across the country. Mr. Fontana serves on the Board of Directors of the FCC Universal Services

Administration Corporation (USAC) originally appointed by Chairman Tom Wheeler in 2015, and recently reappointed by FCC Chairman Ajit Pai. Mr. Fontana has 18 years of telecommunications industry experience and has served in a variety of product and strategy functions, and previously as product and strategy lead for Zayo's European Business Unit headquartered in London. Prior to Zayo, Mr. Fontana held a variety of leadership roles at Level 3 Communications where he was responsible for access management, M&A integrations, network and infrastructure planning and development. Brent earned his bachelor's degree in Economics from Lewis & Clark College in Portland, Oregon.

### **John Schultz**

John Schultz is currently Manager of Fiber Network Deployment for Amazon Web Services. Previously, he was Manager of Planning and Design for Google Fiber, where he led a team that was responsible for the design of new markets and partnerships with private and public sector utilities to allow aerial construction in Google Fiber markets. Mr. Schultz has over 30 years of telecommunications industry experience and has served in engineering, construction, operations and product management positions. Before his time at Google, Mr. Schultz managed U-reka Broadband Ventures, LLC; a boutique consulting company focused on creating partnerships between municipalities and private sector telecommunications companies, participating in projects that raised over \$100 million of Broadband Stimulus funds for projects across the United States. Mr. Schultz also was the COO-General Manager of FTTH Communications, a privately held fiber-to-the home provider in the Minneapolis St. Paul market, providing Triple Play services to residential communities. John earned his bachelor's and master's degrees in Telecommunications Systems and Management from St. Mary's University in Winona, Minnesota.

### **Patrick Kelly**

Mr. Kelly has over 25 years of experience working in the telecommunication industry in a variety of operational and technical roles. During his tenure as a telecommunications professional Mr. Kelly served as an outside plant engineer, network construction manager, and network operations manager for companies including Verizon Communications, Inc. and Amazon Web Services. In these roles his responsibilities included managing multiple construction managers and over 140 union technicians to supervise construction, maintenance, and repair work relating to underground and aerial services. Additionally, in his roles with Verizon he managed the capital and expense programs for network operations in the Albany, New York metro area and worked on routine design engineering providing T-1, T-3, ISDN, fiber optic service to CAS and large enterprise customers within New York. Mr. Kelly is certified in OSHA.

The key officers and directors of AMCS are as follows:

Peter Hill – President

Mihir Patel – Vice President

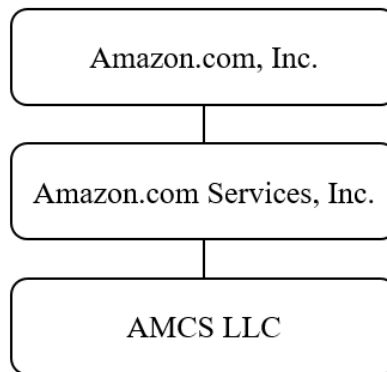
Pasquale DeMaio – Vice President

The officers and directors listed above can be reached through Applicant's corporate headquarters at 4250 N. Fairfax Drive, 13<sup>th</sup> Floor, Arlington, VA 22203 or by telephone at (703) 344-9122. Neither AMCS nor any of the officers or directors listed above have been or are

currently the subject of any civil or criminal proceedings pending before any state or federal regulatory commission, administrative agency, or law enforcement agency that could adversely affect AMCS' ability to provide telecommunications services in Ohio.

### **I-3: Corporate Structure**

Applicant is a wholly-owned subsidiary of Amazon.com Services, Inc., a Delaware corporation, which in turn is a subsidiary of Amazon.com, Inc. ("Amazon"), a publicly traded company (NASDAQ: AMZN), as depicted in the organizational chart below:



### **I-4: Operations in other states**

AMCS is currently certified to provide telecommunications services in two other states: Oregon and Virginia.<sup>1</sup>

### **I-5: Verification of compliance with FCC rules**

The applicant will follow all applicable Federal Communications Commission (FCC) rules.

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<sup>1</sup> AMCS also has pending an application for a certificate of public convenience and necessity in the State of California.



## **EXHIBIT J**

### **Explanation of Rates**

AMCS' rates will be developed based on market conditions through individually negotiated contracts with its customers.

## **EXHIBIT K**

### **Interconnection and Resale Statement**

Applicant does not intend to provide services that require interconnection or resale agreements under Section 251 of the Communications Act of 1934, as amended. Accordingly, Applicant has not entered into negotiations for such agreements. A notarized affidavit regarding interconnection negotiations is, therefore, unnecessary.

## **EXHIBIT L**

### **Sample copy of customer bill**

Sample bills have not yet been developed. Applicants' customers will consist primarily of business customers and the billing will likely be done on an individual case basis.

**EXHIBIT M**

**Sample disconnection notice**

Such notices have not been developed.

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

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**Case No(s). 19-2044-TP-BLS**

Summary: Application Application of AMCS Network Services to Provide Telecommunications Services in the State of Ohio electronically filed by Mr. Calvin Lam on behalf of Davis Wright Tremaine LLP