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July 26, 2021

Via E-filing

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. 21-0780-TP-ACE
ExteNet Asset Entity, LLC Application to Provide Telecommunications
Services Throughout the State of Ohio**

RESPONSE TO STAFF DATA REQUEST MEMORANDUM

Dear Secretary McNeal:

On behalf of ExteNet Asset Entity, LLC (together, the "Registrants"), this letter supplements the above-referenced Application to respond to the memorandum issued by staff on July 15, 2021.

1. Exhibit A-1 – Telecommunication Retail Service Offering Form, Section II: Please complete Section II of this form by selecting "Other" and include a description of the services as described in Exhibit A.

RESPONSE: Applicant provides the revised Telecommunication Retail Service Offering Form as Replacement Exhibit A-1.

2. Exhibit G – Please provide an Ohio Secretary of State Certificate. Per the Telecommunication Supplemental Application Form for Carrier Certification - Business Requirements, an application must include a copy of the certification from the Ohio Secretary of State and a Certificate of Good Standing.

RESPONSE: Applicant provides its Ohio Secretary of State Certificate as Supplemental Exhibit G-1.

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3. The Applicant has two affiliates, ExteNet Systems, Inc., case 06-1265-TP-ACE (certificate 90-6362) and Hudson Fiber Network Inc., case 19-1743-TP-ACE (certificate 90-6433) both are approved to offer similar services, statewide, as the services being proposed in this case, why does the Applicant need another certificate to offer the services being proposed in this application?

RESPONSE: EAE's Application is part of ExteNet's plan to expand the ExteNet family of authorized operating companies, including EAE, ESI, and Hudson Fiber Network Inc. ("HFN"), to better align its businesses with current and future customer focus and growth and to obtain additional debt financing.

Upon grant of its certificate, EAE will provide point-to-point telecommunications services and networks to wireless service providers ("WSPs") and other carriers on a wholesale basis. ESI will continue to operate under its existing certificate and will continue to develop, sell, and construct new distributed networks and provide "lit" services to commercial users and new services. HFN will continue to primarily provide point-to-point telecommunications services such as Private Line, Ethernet, Wavelength, Distributed Networks, and similar services to wholesale customers, government customers, and health care, education, financial services, and other enterprise customers. This realignment will allow ExteNet to focus on providing high quality services to each respective group of customers.

EAE, ESI, and HFN confirm that there is a need for separate certificates for each entity in Ohio. EAE, ESI, and HFN all expect to have jurisdictional revenue after EAE is granted a Certificate to provide telecommunications services in Ohio. EAE primarily will provide services and networks primarily to WSP customers. ESI will continue to operate under its existing certificate and will continue to develop, sell, and construct new distributed networks, along with providing "lit" services to commercial users and new services. HFN will provide its services to wholesale customers, government customers, and health care, education, financial services, and other enterprise customers.

Please acknowledge receipt and acceptance of this filing. Should you have any questions concerning this filing, please do not hesitate to contact us.

Respectfully submitted,

/s/ Stephany Fan

Ronald W. Del Sesto, Jr.
Stephany Fan

Counsel for ExteNet Asset Entity, LLC

cc: Ms. Robbin Russell, Utility Specialist (via e-mail)

Replacement Exhibit A-1

Revised 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 ExteNet Asset Entity, LLC

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 630-505-3811 Fax N/A

Regulatory Contact Person's Email Address bkirk@extenetsystems.com

Contact Person for Annual Report Brian Kirk, Deputy General Counsel Phone 630-505-3811 Fax N/A

Consumer Contact Information Matt Simpson Phone 630-799-6807 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) Point-to-point telecommunications services and networks, including dark fiber, targeted to wireless service providers.

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

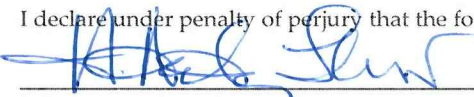
Carrier hereby attests to its compliance with pertinent entries and orders issued by the Commission.

H. Anthony Lehv, Senior Vice President & Secretary

I am an officer/agent of the carrier/telephone company, ExteNet Asset Entity, 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)

July 21, 2021
(Date)

Supplemental Exhibit G-1

Ohio Secretary of State Certificate



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
02/07/2019	201903800280	REGISTRATION OF FOREIGN FOR PROFIT LLC (LFP)	99.00	100.00	0.00	0.00

Receipt

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

CORPORATION SERVICE COMPANY
MONIQUE WEAVER
50 W. BROAD STREET
COLUMBUS, OH 43215

**STATE OF OHIO
CERTIFICATE**

**Ohio Secretary of State, Frank LaRose
4290513**

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

EXTENET ASSET ENTITY, LLC

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

Document(s)

REGISTRATION OF FOREIGN FOR PROFIT LLC

Effective Date: 02/06/2019

Document No(s):

201903800280



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
7th day of February, A.D. 2019.

Ohio Secretary of State

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in

Case No(s). 21-0780-TP-ACE

Summary: Response to Staff Data Request Memorandum electronically filed by Ms. Stephany Fan on behalf of ExteNet Asset Entity, LLC