

April 8, 2016



16-00036

Ms. Sharla Dillon
Tennessee Regulatory Authority
Andrew Jackson State Office Bldg.
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

RE: Application of Mobilitie Management, LLC, for a Certificate to Provide Competing Local Telecommunications Services in the State of Tennessee

Dear Ms. Dillon,

On behalf of Mobilitie Management, LLC, enclosed for filing with the Commission are an original and four (4) copies of the above-referenced application and a check in the amount of \$25.00 for the requisite application filing fee.

We respectfully request the confidential treatment of the financial information included in Exhibits F. Exhibit F has been provided in the full application in its public redacted form. The separate sealed envelope marked 'CONFIDENTIAL' contains the confidential version of Exhibit F.

We ask that the enclosed Return Stamped Copy of this letter be returned in the self-addressed, stamped envelope provided as confirmation of receipt. Should you have any questions concerning this filing, please do not hesitate to contact the undersigned at (703)714-1317 or jgw@commlawgroup.com.

Respectfully Submitted,

Joanna G. Wallace
Counsel for Mobilitie Management, LLC

Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN THE MATTER OF THE APPLICATION)
OF MOBILITIE MANAGEMENT, LLC)
FOR A CERTIFICATE)
TO PROVIDE COMPETING LOCAL)
TELECOMMUNICATIONS SERVICES)

**APPLICATION FOR CERTIFICATE TO PROVIDE
COMPETING LOCAL TELECOMMUNICATIONS SERVICES**

Pursuant to TCA § 65-4-201, Mobilitie Management, LLC (“Mobilitie Management” or “Applicant”) respectfully requests that the Tennessee Regulatory Authority (“TRA”) grant to the Applicant authority to provide competing local telecommunications services, including exchange access telecommunications services, within the State of Tennessee. Mobilitie Management is willing and able to comply with all applicable rules and regulations in Tennessee pertaining to the provision of competing local telecommunications services.

In support of its Application, Mobilitie Management submits the following:

1. The full name and address of the Applicant is:

Mobilitie Management, LLC
2220 University Drive
Newport Beach, CA 92660
Telephone: (877) 999-7070

Questions regarding this application should be directed to:

Michael P. Donahue
Joanna G. Wallace
Marashlian & Donahue, PLLC
1420 Spring Hill Road, Suite 401
McLean, VA 22102
Phone: (703) 714-1319
Fax: (703) 563-6222
Email: mpd@commlawgroup.com
 jgw@commlawgroup.com

Contact name and address at the Company is:

Ethan Rogers
2220 University Drive
Newport Beach, CA 92660
Telephone: (949) 999-5767
Facsimile: (949) 274-7556

2. Organizational Chart of Corporate Structure: Include any pertinent acquisition or merger information.

See **Exhibit A**

3. Corporate information:

Applicant is a Delaware limited liability company, and is qualified to do business in Tennessee. A copy of Applicant's Articles of Formation is attached hereto as **Exhibit B**, and a copy of Applicant's Certificate of Authority to do business in Tennessee is attached hereto as **Exhibit C**. The names and addresses of the principal corporate officers are in **Exhibit D**. There are no officers in Tennessee. The biographies of the principal officers and any other key technical staff are in **Exhibit E**.

4. Mobilitie Management possesses the managerial, technical, and financial ability to provide local telecommunications service in the State of Tennessee as demonstrated below:

A. Financial Qualifications:

Applicant has the requisite financial qualifications to provide local telecommunications services in the State of Tennessee. Applicant has access to the financing and capital necessary to provide the proposed services in Tennessee. In support of its financial qualifications, Mobilitie Management submits the financial records in **Exhibit F** (confidential).

B. Managerial Qualifications:

As shown in **Exhibit E** to this Application, Applicant has the requisite managerial qualifications to provide local telecommunications services in the State of Tennessee. Applicant's management team includes individuals with substantive experience in successfully developing and operating telecommunications businesses. Consequently, Applicant has the requisite technical resources to support its Tennessee operations, making Applicant's management well-qualified to operate Applicant's local telecommunications services in Tennessee.

C. Technical Qualifications:

As applicable, Mobilitie Management's services will satisfy the minimum standards established by the TRA. The company will file and maintain required tariffs in the manner prescribed by the TRA and will meet minimum required basic local standards, including quality of service and billing standards required of all LEC'S regulated by the TRA. Applicant will not require customers to

purchase CPE, which cannot be used with the Incumbent Local Exchange Carrier's systems. As noted in the biographies **Exhibit E** of the principal officers, Mobilitie Management's officers are experienced telecommunications industry executives. Thus, Mobilitie Management is technically qualified to provide local exchange service in Tennessee.

5. Proposed Service Area:

Because Applicant is a startup, it is not authorized to provide telecommunications services in any other state. However, Mobilitie Management is in the process of filing applications for authority to provide Competitive Local Exchange Services in all 50 states and Washington, DC.

The Applicant proposes to offer its services throughout the State of Tennessee.

6. Types of Local Exchange Service to be provided:

Applicant proposes to provide facilities-based and resold local exchange telecommunications services. Specifically, Applicant will provide transport, backhaul, and broadband data and other voice and data services as well as other infrastructure used by carriers, emergency responders, public safety agencies, backhaul providers, and other companies. These services will be provided using a combination of fixed lines and microwave links to ensure resiliency.

7. Repair and Maintenance:

Mobilitie Management does not plan to serve end users; however, it understands the importance of effective customer service for local service customers. Complaints by Mobilitie Management's carrier and other customers can be communicated to Mobilitie Management via telephone or email at (877) 999-7070 and solutions@mobilitie.com, respectively. Applicant will also have a network operation center ("NOC"), which can be reached on a 24 hours-a-day basis at (877) 338-1287. The Tennessee contact person knowledgeable about providers operations is Ethan Rogers. Contact information for Mr. Rogers is above.

8. Small and Minority-Owned Telecommunications Business Participation Plan:

See **Exhibit G**

9. Toll Dialing Parity Plan, Numbering Issues, and Tennessee-Specific Operational Issues:

Not applicable. These requirements are generally applicable to traditional, TDM telephone service. Mobilitie Management plans to provide telephone service only through VoIP technology. Mobilitie Management therefore submits that each of these requirements should be waived to the extent the TRA is able and willing to do so. To the extent that the TRA determines that any of these requirements cannot or should not be waived, Mobilitie Management will amend this application accordingly.

10. Service of Notice:

Applicant has served notice of this application to the eighteen (18) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operating geographically. See **Exhibit H** for the list.

11. **Miscellaneous:**

- A. Sworn Pre-filed testimony: See **Exhibit I**
- B. Applicant does not require customer deposits
- C. As of now, Mobilitie Management has not been subject to complaints in any of the states in which it is doing business.
- D. A copy of our tariff is enclosed: **Exhibit J**
- E. Mobilitie Management will comply with all applicable TRA policies, rules and orders.
- F. A surety bond will be obtained and filed prior to the granting of a certificate.

CONCLUSION:

Mobilitie Management respectfully requests that the TRA enter an order granting it a certificate of convenience and necessity to operate as a competing telecommunications service provider. For the reasons stated above, Mobilitie Management's provision of these services would promote the public interest by providing high-quality service at competitive prices and by creating greater economic incentives for the development and improvement for all competing providers.

Respectfully submitted this ____ day of April, 2016.

A handwritten signature in black ink, appearing to read 'C. Karmis', written over a horizontal line.

Christos Karmis

President

Mobilitie Management, LLC

EXHIBIT A

Organization Chart

MOBILITIE STRUCTURE CHART

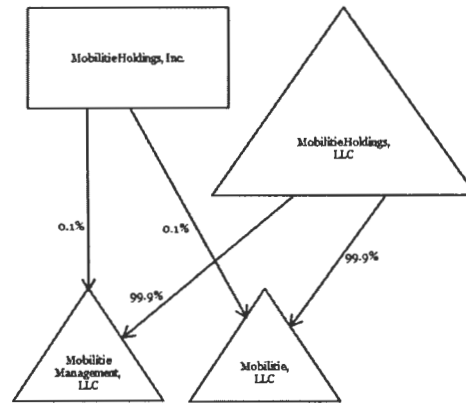


EXHIBIT B

Articles of Formation

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY "MOBILITIE MANAGEMENT, LLC" IS DULY
FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD
STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS
OFFICE SHOW, AS OF THE FIFTEENTH DAY OF JANUARY, A.D. 2016.



5906000 8300

SR# 20160241751

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Jeffrey W. Bullock, Secretary of State

Authentication: 201685350

Date: 01-15-16

B0:91-7549 02/17/2016 1:45 PM Received by Tennessee Secretary of State Tre Hargett

EXHIBIT C

Certificate of Authority to do Business in Tennessee



STATE OF TENNESSEE
Tre Hargett, Secretary of State
Division of Business Services
William R. Snodgrass Tower
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

Mobilitie Management, LLC
2220 UNIVERSITY DR
NEWPORT BEACH, CA 92660-3319

February 17, 2016

Filing Acknowledgment

Please review the filing information below and notify our office immediately of any discrepancies.

SOS Control # :	000834149	Formation Locale:	DELAWARE
Filing Type:	Limited Liability Company - Foreign	Date Formed:	12/11/2015
Filing Date:	02/17/2016 1:45 PM	Fiscal Year Close:	12
Status:	Active	Annual Report Due:	04/01/2017
Duration Term:	Perpetual	Image # :	B0191-7547
Managed By:	Manager Managed		

Document Receipt

Receipt # : 002461485	Filing Fee:	\$300.00
Payment-Check/MO - THE COMPLIANCE GROUP, MCLEAN, VA		\$300.00

Registered Agent Address:
NATIONAL REGISTERED AGENTS, INC.
STE 2021
800 S GAY ST
KNOXVILLE, TN 37929-9710

Principal Address:
2220 UNIVERSITY DR
NEWPORT BEACH, CA 92660-3319

Congratulations on the successful filing of your **Application for Certificate of Authority** for **Mobilitie Management, LLC** in the State of Tennessee which is effective on the date shown above. Please visit the Tennessee Department of Revenue website (apps.tn.gov/bizreg) to determine your online tax registration requirements. If you need to obtain a Certificate of Existence for this entity, you can request, pay for, and receive it from our website.

You must file an Annual Report with this office on or before the Annual Report Due Date noted above and maintain a Registered Office and Registered Agent. Failure to do so will subject the business to Administrative Dissolution/Revocation.


Tre Hargett
Secretary of State

Processed By: Stephanie Booker



STATE OF TENNESSEE
Tre Hargett, Secretary of State
Division of Business Services
William R. Snodgrass Tower
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

AMANDA ENGEL
1420 SPRING HILL ROAD, SUITE 401
MCLEAN, VA 22102

April 8, 2016

Request Type: Certificate of Existence/Authorization
Request #: 0198827

Issuance Date: 04/08/2016
Copies Requested: 1

Document Receipt

Receipt #: 002633088

Filing Fee: \$20.00

Payment-Credit Card - State Payment Center - CC #: 3669084750

\$20.00

Regarding: Mobilitie Management, LLC

Filing Type: Limited Liability Company - Foreign

Control #: 834149

Formation/Qualification Date: 02/17/2016

Date Formed: 12/11/2015

Status: Active

Formation Locale: DELAWARE

Duration Term: Perpetual

Inactive Date:

CERTIFICATE OF AUTHORIZATION

I, Tre Hargett, Secretary of State of the State of Tennessee, do hereby certify that effective as of the issuance date noted above

Mobilitie Management, LLC

* is a Limited Liability Company formed in the jurisdiction set forth above and is authorized to transact business in this State;

* has paid all fees, taxes and penalties owed to this State (as reflected in the records of the Secretary of State and the Department of Revenue) which affect the existence/authorization of the business;

* has appointed a registered agent and registered office in this State;

* has not filed an Application for Certificate of Withdrawal.

Tre Hargett
Secretary of State

Processed By: Cert Web User

Verification #: 016853329



000834149

APPLICATION FOR CERTIFICATE OF AUTHORITY
LIMITED LIABILITY COMPANY (ss-4233)

Page 1 of 2



Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102
(615) 741-2286

Filing Fee: \$50.00 per member
(minimum fee = \$300.00, maximum fee = \$3,000.00)

For Office Use Only

Control # 000834149

FILED

Amount Due: \$300.00
Please file immediately

To the Secretary of the State of Tennessee:

Pursuant to the provisions of T.C.A. §48-249-904 of the Tennessee Revised Limited Liability Company Act, the undersigned hereby applies for a certificate of authority to transact business in the State of Tennessee, and for that purpose sets forth:

1. The name of the Limited Liability Company is: Mobilitie Management, LLC
If different, the name under which the certificate of authority is to be obtained is:

NOTE: The Secretary of State of the State of Tennessee may not issue a certificate of authority to a foreign Limited Liability Company if its name does not comply with the requirements of T.C.A. §48-249-106 of the Tennessee Revised Limited Liability Company Act. If obtaining a certificate of authority under an assumed Limited Liability Company name, an application must be filed pursuant to T.C.A. §48-249-106(d).

2. The state or country under whose law it is formed is: DELAWARE
and the date (mm/dd/yyyy) of its formation is: 12/11/2015
and, if prior to qualifying, the date it commenced doing business in Tennessee is: (none)

NOTE: Additional filing fees and proof of tax clearance confirming good standing may apply if the Limited Liability Company commenced doing business in Tennessee prior to the approval of this application. See T.C.A. §48-249-913(d) and T.C.A. §48-249-905(c).

3. This company has the additional designation of:

4. The name and complete address of its registered agent and office located in the state of Tennessee is:
NATIONAL REGISTERED AGENTS, INC.
STE 2021
800 S GAY ST
KNOXVILLE, TN 37929-9710
KNOX COUNTY

5. Fiscal Year Close Month: December

6. If the document is not to be effective upon filing by the Secretary of State, the delayed effective date and time is:
(none) (Not to exceed 90 days)

7. The LLC will be: ☐ Member Managed ☒ Manager Managed ☐ Director Managed ☐ Board Managed ☐ Other

8. Number of Members at the date of filing: 1

9. Period of Duration: Perpetual

10. The complete address of its principal executive office is:
2220 UNIVERSITY DR
NEWPORT BEACH, CA 92660-3319

EXHIBIT D

Names and Addresses of Principal Corporate Officers

Christos Karmis
President
Mobilitie Management, LLC
2220 University Drive
Newport Beach, CA 92660

EXHIBIT E

Biographies of the Principal Officers and Other Key Technical Staff

CHRISTOS KARMIS

2220 University Drive, Newport Beach, CA 92660
Phone: 949.999.5766 • Email: christos@mobilitie.com

SUMMARY

Christos Karmis is President of Mobilitie and a recognized leader in the telecom industry.

Since joining Mobilitie, Christos led the development and implementation of our customized Lease-to-Suit™ telecom program with several of the largest national telecom carriers. He also currently oversees tower leasing and colocation activity on Mobilitie's telecom communication towers.

Before joining Mobilitie, Christos specialized in real estate advisory services and the telecom communications industry with Deloitte Consulting. While at Deloitte, he provided operational and network optimization strategies to several of the Big Six Telecom Carriers.

In addition, Christos is experienced with process improvement, technology optimization, and establishing Sarbanes-Oxley-compliant financial controls for network lease administration. He has also led due diligence projects for the sale of significant telecom communication assets.

Prior to joining Deloitte, Christos was an engineer for Harris Corporation specializing in digital mapping.

EXPERIENCE AND SELECTED ACHIEVEMENTS

Mobilitie, LLC. **President**

September 2005 – Present

Leads the development and implementation of our customized Lease-to-Suit™ telecom program with several of the largest national telecom carriers

Oversees tower leasing and colocation activity on Mobilitie's telecom communication towers

Deloitte Consulting **Telecommunications Consultant**

August 2001 – August 2005

Specialized in real estate advisory services and the telecom communications industry

Provided operational and network optimization strategies to several of the Big Six Telecom Carriers

Worked on process improvement, technology optimization, and establishing Sarbanes-Oxley-compliant financial controls for network lease administration

Led due diligence projects for the sale of significant telecom communication assets

Harris Corporation **Engineering Manager**

May 1997 – August 1999

Specialized in digital mapping

EDUCATION

MBA, University of Florida - Warrington College of Business Administration, 1999 – 2001
BS, Mechanical Engineering, Clemson University, 1992 – 1997

EXHIBIT F

Financial Qualifications

CONFIDENTIAL – FILED UNDER SEAL

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(REDACTED VERSION)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT G

Small and Minority-Owned Telecommunications Business Participation Plan

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §65-5-112, as amended, Mobilitie Management, LLC (“Mobilitie Management”) submits this small and minority-owned Telecommunications business participation plan (the “Plan”) along with its Application for a Certificate of Public Convenience and Necessity to provide competing facilities-based and resold local exchange services in Tennessee.

I. PURPOSE

The purpose of §65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. Mobilitie Management is committed to the goals of §65-5-112 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the Telecommunications industry. Mobilitie Management will endeavor to provide opportunities for small and minority-owned Telecommunications businesses to Mobilitie Management will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Mobilitie Management of such opportunities.

Mobilitie Management’s representatives will contact the Department of Economic and Community Development, the administrator of the small and minority-owned Telecommunications assistance program, to obtain a list of qualified vendors. Moreover, Mobilitie Management will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in §65-5-112.

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars (\$4,000,000).

Small Business. Small Business shall mean a business with annual gross receipts of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

Mobilitie Management's Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting Mobilitie Management's full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Christos Karmis
President
Mobilitie Management, LLC
2220 University Drive
Newport Beach, CA 92660
Telephone: 877-999-7070

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Regulatory Authority.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- (3) Preparing and submitting such forms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.

- (4) Serving as the primary liaison to and cooperate with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses as defined in §65-5-112.
- (5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.
- (6) Providing records and reports and cooperating in any authorized surveys as required by the Tennessee Regulatory Authority.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.
- (8) Providing information and educational activities to persons within Mobilitie Management and training such persons to seek out, encourage, and promote the use of small and minority-owned businesses.

In performance of these duties, the Administrator will utilize a number of resources,

including:

Chambers of Commerce

The Tennessee Department of Economic and Community
Development

The United States Department of
Commerce

Small Business Administration

Office of Minority Business

The National Minority Supplier Development
Counsel The National Association of Women
Business Owners The National Association of
Minority Contractors

Historically Black Colleges, Universities, and Minority
Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

IV. RECORDS AND COMPLIANCE REPORTS

Mobilitie Management will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, Mobilitie Management will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.

Mobilitie Management will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, Mobilitie Management will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

Mobilitie Management, LLC

By: 
Christos Karmis
President

Dated: April __, 2016

EXHIBIT H

Service List

Tennessee Regulatory Authority List Of ILEC Providers

ILEC

<u>ID</u>	<u>Company Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>	<u>Market Reg</u>
21	Ardmore Telephone Company	237 N. 8th Street	Mayfield	KY	42066-0000	N
1	BellSouth Telecommunications, LLC	333 Commerce Street Suite 2106	Nashville	TN	37201-3300	Y
14	CenturyTel of Adamsville	14111 Capital Blvd Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
15	CenturyTel of Claiborne	14111 Capital Blvd Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
17	CenturyTel of Ooltewah-Collegedale	14111 Capital Blvd Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
13	Concord Telephone Exchange, Inc.	10025 Investment Drive Suite 200	Knoxville	TN	37932-0000	Y
16	Crockett Telephone Company	Attention Lisa Wigington PO Box 24207	Jackson	MS	39225-0000	Y
74668	Frontier Communications of Tennessee	300 Bland Street	Bluefield	WV	24701-0000	Y
20	Frontier Communications Of The Volunteer State	300 Bland Street	Bluefield	WV	24701-0000	Y
22	Humphreys County Telephone Company	10025 Investment Drive Suite 200	Knoxville	TN	37932-0000	Y
23	Loretto Telephone Company	P. O. Box 130	Loretto	TN	38469-0000	Y
24	Millington Telephone Company, Inc.	PO Box 17040	Jonesboro	AR	72403-0000	Y
18	Peoples Telephone Company	Attention Lisa Wigington PO Box 24207	Jackson	MS	39225-0000	Y
12	Tellico Telephone Company	10025 Investment Drive Suite 200	Knoxville	TN	37932-0000	Y
11	Tennessee Telephone Company	10025 Investment Drive Suite 200	Knoxville	TN	37932-0000	Y
25	United Telephone Company, Inc.	P. O. Box 38	Chapel Hill	TN	37034-0000	N
3	United Telephone Southeast, LLC	1411 Capital Blvd. Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
19	West Tennessee Telephone Co.	Attention Lisa Wigington PO Box 24207	Jackson	MS	39225-0000	Y

EXHIBIT I

Sworn Pre-Filed Testimony

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**APPLICATION OF MOBILITIE
MANAGEMENT, LLC FOR A
CERTIFICATE TO PROVIDE
COMPETING LOCAL TELEPHONE
SERVICES**

PRE-FILED TESTIMONY OF CHRISTOS KARMIS

I, Christos Karmis, do hereby testify as follows in support of the application of Mobilitie Management, LLC (“Mobilitie Management”) for a Certificate of convenience and necessity as a competing telecommunications services provider to provide telecommunication services throughout the State of Tennessee.

Q: Please state your full name, business address, and position.

Christos Karmis
Mobilitie Management, LLC
2220 University Drive
Newport Beach, CA 92660

Q: Please briefly describe your duties.

I am President of Mobilitie Management, LLC.

Q: Please describe your business experience and educational background.

My resume included in Mobilitie Management, LLC’s Application for a Certificate to Provide Competing Local Telephone Services provides a detailed overview of my business experience and educational background.

Q: Are all statements in Mobilitie Management’s application true and correct to the best of your knowledge, information and belief?

Yes.

Q: Please describe the current corporate structure of Mobilitie Management.

Mobilitie Management is a subsidiary of Mobilitie Holdings, LLC. Mobilitie Management is organized as a Delaware limited liability company.

Q: Does Mobilitie Management possess the requisite managerial, financial, and technical abilities to provide the services for which it has applied for authority?

As described in Mobilitie Management's Application for a Certificate to Provide Competing Local Telephone Services, Mobilitie Management possesses the requisite managerial, financial, and technical abilities to provide the services for which it has applied for authority.

Q: Please describe Mobilitie Management's financial qualifications.

Mobilitie Management is a startup, so it does not have past financial information that it can provide. However, Mobilitie Management will have access to the capital and financing to support its service in Tennessee through its parent company, Mobilitie Holdings, LLC. Mobilitie Holding's financial information is being provided under seal as part of Mobilitie Management's Application.

Q: Please describe Mobilitie Management's managerial and technical qualifications.

Mobilitie Management has the requisite technical and managerial qualifications to provide local telecommunications services in the State of Tennessee. Mobilitie Management's management team includes individuals with substantive experience in successfully developing and operating telecommunications businesses. Consequently, Mobilitie Management has the requisite technical resources to support its Tennessee operations, making Mobilitie Management's management well-qualified to operate Applicant's local telecommunications services in Tennessee.

Q: What services will Mobilitie Management offer?

Mobilitie Management proposes to provide facilities-based and resold local exchange telecommunications services. Specifically, Mobilitie Management will provide transport, backhaul, and broadband data and other voice and data services as well as other infrastructure used by carriers, emergency responders, public safety agencies, backhaul providers, and other companies. These services will be provided using a combination of fixed lines and microwave links to ensure resiliency.

Q: Will Mobilitie Management offer service to all consumers within its service area?

Mobilitie Management does not plan to serve end user customers. Rather, it will provide service to carriers, and other infrastructure customers. Mobilitie Management will bring its experience in designing and managing communications networks to its management of its network in Tennessee, which will improve transport, backhaul, and broadband data services for Mobilitie Management's carrier and other infrastructure customers.

Q: Does Mobilitie Management plan to offer local exchange telecommunications services in areas served by any incumbent local exchange telephone company with fewer than 100,000 total access lines?

No, Mobilitie Management does not plan to serve any end users in Tennessee.

Q: Will the granting of a certificate of convenience and necessity to Mobilitie Management serve the public interest?

Grant of this Application would serve the public interest by expanding the availability of competitive telecommunications services in the State of Tennessee. Moreover, as demonstrated in the Application, Mobilitie Management is financially and technically qualified to provide telecommunications service in Tennessee. Competition in the Tennessee local exchange market will promote and serve the public interest by creating incentives for local telecommunications service providers to provide a wider variety of service, improve network efficiencies, and reduce prices for consumers. Grant of this Applicant 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 either the ILECs or other competitive providers operating in Tennessee. Applicant plans to maintain, expand, and upgrade its network as necessary to meet the evolving needs and expectations of its Tennessee customers. Accordingly, grant of this Applicant would be in the public interest for the reasons stated above.

Q: Does Mobilitie Management intend to comply with all TRA rules, statues, and orders pertaining to the provision of telecommunications services in Tennessee, including those for disconnection and reconnection of service?

Yes.

Q: Has any state ever denied Mobilitie Management or one of its affiliates authorization to provide intrastate service?

Mobilitie, LLC ("Mobilitie"), an affiliate of Mobilitie Management, filed an application in Colorado describing its proposed services as radio frequency transport services to enable other carriers, including but not limited to wireless telecommunications service providers, to provision the direct transmission of voice communications and data services. Colorado staff determined that Mobilitie LLC's services would not be "basic local exchange services" under Colorado law and, therefore, would not qualify for or require a certificate of public convenience and necessity. Staff further concluded that, under recent changes to the law, Mobilitie, LLC would be able to provide its services, and obtain access to public rights-of-way, without having to obtain a certificate of public convenience and necessity. Based on these conclusions, staff recommended dismissal of the application.

Q: Has any state ever revoked the certification of Mobilitie Management or one of its affiliates?

Mobilitie, LLC was subject to the Public Service Commission of Wyoming's show cause proceeding under Docket No. 74699-2-TI-13 in 2013 for failure to file its annual report with the Commission in violation of W.S. § 37-2-203(b). In January 2014 the registration authority of Mobilitie, LLC to provide interexchange and local exchange telecommunications services in Wyoming was canceled. Mobilitie, LLC reapplied for authority and was granted authority.

On October 15, 2013, the Rhode Island Public Utilities Commission released an Order revoking the operating authority of Mobilitie, LLC for failure to pay PUC fees and failing to file annual reports.

Mobilitie, LLC has now retained the managed compliance services of a third-party compliance reporting service provider; it will no longer fail to meet its compliance obligations in a timely fashion.

Q: Has Mobilitie Management or one of its affiliates ever been investigated or sanctioned by any regulatory authority for service or billing irregularities?

No.

Q: Who is knowledgeable about Mobilitie Management's operations and will serve as Mobilitie Management's regulatory and customer service contact?

Chester Bragado

Q: Please explain in detail Mobilitie Management's proposed procedures for responding to information requests from the TRA and its staff.

Mobilitie Management takes seriously its responsibility to comply with the rules and procedures of the TRA. To that end, Mobilitie Management will promptly respond to information requests from TRA and its staff directed to the appropriate regulatory contacts listed in its Application. If escalation is necessary, Mobilitie Management's officers listed in its Application will also be available to address TRA's concerns.

Q: Does this conclude your testimony?

Yes.

PRE-FILED TESTIMONY CERTIFICATION

State of California }
County of Orange }

I hereby certify that the foregoing is true and accurate.



Christos Karmis
President
Mobilitie Management, LLC

Respectfully submitted this _____ day of April, 2016.

Notary Public _____

My commission expires _____

CALIFORNIA JURAT WITH AFFIANT STATEMENT**GOVERNMENT CODE § 8202**

- ☒ See Attached Document (Notary to cross out lines 1–6 below)
☐ See Statement Below (Lines 1–6 to be completed only by document signer[s], *not* Notary)

(This area is crossed out with a large blue X, indicating that the attached document is used for verification.)

*Signature of Document Signer No. 1*_____
Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

Subscribed and sworn to (or affirmed) before me

on this 18th day of April, 2016,
by Date Month Year(1) CHRISTOS KARMIS(and (2) _____),
*Name(s) of Signer(s)*proved to me on the basis of satisfactory evidence
to be the person(s) who appeared before me._____
*Signature**Signature of Notary Public*

Seal
Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN THE MATTER OF THE APPLICATION)
OF MOBILITIE MANAGEMENT, LLC)
FOR A CERTIFICATE)
TO PROVIDE COMPETING LOCAL)
TELECOMMUNICATIONS SERVICES)

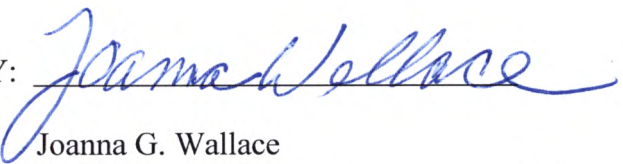
NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECS)

PLEASE TAKE NOTICE, that in accordance with the Tennessee Regulatory Authority Rules for the Provision of Competitive Intrastate Telecommunications Services, you are hereby given notice that on April 8, 2016, Mobilitie Management, LLC filed an Application for a Certificate of Public Convenience and Necessity to Provide Competing Local Telecommunications Services.

This 8th day of April, 2016

BY:



Joanna G. Wallace

Counsel for Mobilitie Management, LLC

Tennessee Regulatory Authority List Of ILEC Providers

ILEC

<u>ID</u>	<u>Company Name</u>	<u>Address</u>		<u>City</u>	<u>State</u>	<u>Zip</u>	<u>Market Reg</u>
21	Ardmore Telephone Company	237 N. 8th Street		Mayfield	KY	42066-0000	N
1	BellSouth Telecommunications, LLC	333 Commerce Street	Suite 2106	Nashville	TN	37201-3300	Y
14	CenturyTel of Adamsville	14111 Capital Blvd	Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
15	CenturyTel of Claiborne	14111 Capital Blvd	Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
17	CenturyTel of Ooltewah-Collegedale	14111 Capital Blvd	Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
13	Concord Telephone Exchange, Inc.	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000	Y
16	Crockett Telephone Company	Attention Lisa Wigington	PO Box 24207	Jackson	MS	39225-0000	Y
74668	Frontier Communications of Tennessee	300 Bland Street		Bluefield	WV	24701-0000	Y
20	Frontier Communications Of The Volunteer State	300 Bland Street		Bluefield	WV	24701-0000	Y
22	Humphreys County Telephone Company	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000	Y
23	Loretto Telephone Company	P. O. Box 130		Loretto	TN	38469-0000	Y
24	Millington Telephone Company, Inc.	PO Box 17040		Jonesboro	AR	72403-0000	Y
18	Peoples Telephone Company	Attention Lisa Wigington	PO Box 24207	Jackson	MS	39225-0000	Y
12	Tellico Telephone Company	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000	Y
11	Tennessee Telephone Company	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000	Y
25	United Telephone Company, Inc.	P. O. Box 38		Chapel Hill	TN	37034-0000	N
3	United Telephone Southeast, LLC	1411 Capital Blvd.	Attn Deloris Carrc	Wake Forest	NC	27587-0000	Y
19	West Tennessee Telephone Co.	Attention Lisa Wigington	PO Box 24207	Jackson	MS	39225-0000	Y