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2019 APR -3 AM 10: 52

T.P.U.C. DOCKET ROOM April 2, 2019
Via Overnight Delivery

Ms. Darlene K. Standley, Asst. Chief - Telecommunications
Tennessee Public Utility Commission
502 Deaderick Street
4th Floor
Nashville, TN 37243

19-00044

RE: In The Matter of the Application of CTI Fiber Services, LLC for a Certificate to Provide Facilities-Based and Resold Cellular Transport Services

Dear Ms. Standley:

Enclosed for filing please find the original and thirteen (13) copies of the Application for a Certificate to Provide Facilities-Based and Resold Cellular Transport Services submitted on behalf of CTI Fiber Services, LLC. A check in the amount of \$25.00 is included with this Application representing the filing fee.

Two (2) copies of the confidential proprietary financial statements of CTI Towers, Inc. and Subsidiaries are submitted under separate seal as part of this filing under Exhibit F1 and Exhibit F2. Please handle in accordance with your established procedures for confidential material.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004. Thank you for your assistance in this matter.

Sincerely,

Nelson Fernandez
Consultant

tms: TNx1900

Enclosures
NF/sw

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

IN THE MATTER OF CTI FIBER SERVICES, LLC
FOR A CERTIFICATE TO PROVIDE
FACILITIES-BASED AND RESOLD CELLULAR
TRANSPORT SERVICES
THROUGHOUT THE STATE OF TENNESSEE

)
)
)
) Docket No. 19-00044
)

**APPLICATION OF CTI FIBER SERVICES.
FOR A CERTIFICATE TO PROVIDE FACILITIES-BASED AND RESOLD
CELLULAR TRANSPORT SERVICES**

Pursuant to applicable Tennessee Statutes and the Rules and Regulations of the Tennessee Public Utility Commission and Section 253 of the Federal Telecommunications Act of 1996 ("Act"), CTI Fiber Services, LLC ("CTI Fiber Services" or "Applicant") respectfully requests that the Tennessee Public Utility Commission ("TPUC") grant it authority to provide facilities-based and resold cellular transport services within the State of Tennessee. Applicant intends to operate pursuant to market regulation, in accordance with amended TCA §65-5-109 enacted May 21, 2009. CTI Fiber Services, LLC is willing and able to comply with all applicable rules and regulations in Tennessee pertaining to the provision of competing local telecommunications services. TCA §65-4-201.

In support of its Application, CTI Fiber Services submits the following:

I. Administrative Requirements

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

CTI Fiber Services, LLC
5000 CentreGreen Way, Suite 325
Cary, NC 27513
Telephone: (919) 893-2841

2. Questions regarding this application should be directed to:

Nelson Fernandez, Consultant
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, Florida 32751
Phone: (407) 740-3004
Facsimile: (407) 740-0613
E-Mail: nfernandez@inteserra.com

3. Contact name and address at the Applicant is:

Lisa Linares
Vice President of Strategic Initiatives
CTI Fiber Services, LLC
5000 CentreGreen Way, Suite 325
Cary, NC 27513
Telephone: (919) 893-2841
Email: llinares@ctitowers.com

4. Organizational Chart of Corporate Structure:

See Exhibit A.

5. Corporate Principal Officers (names and address):

The names and address of the Applicant's corporate officers are listed in **Exhibit B** of this Application.

6. Principal Officers in Tennessee (names and address if different from corporate):

The Applicant does not have any employees in the state of Tennessee. Applicant operations will be managed centrally at the North Carolina location.

7. Copy of Articles of Incorporation:

CTI Fiber Services, LLC was organized in the state of Delaware on August 16, 2018. A copy of CTI Fiber Services' Articles of Organization and amendments are provided in **Exhibit C**.

8. Copy of license to do business in the state of Tennessee.

See Exhibit D.

II. Managerial Requirements

CTI Fiber Services has the managerial expertise to provide facilities-based and resold cellular transport services within the state of Tennessee. CTI Fiber Services has an excellent senior management team, backed by experienced employees, who are competent in telephony engineering, operations and marketing. **Exhibit E** contains biographies of the senior management team of CTI Fiber Services.

III. Technical Requirements

As indicated in the biographies attached as **Exhibit E**, CTI Fiber Services is technically well qualified to provide the services proposed herein and its services will satisfy the minimum standards prescribed by the TPUC, including quality of service and billing standards required of all LECs regulated by the TPUC.¹

Geographic area coverage

CTI Fiber Services requests authority to offer service throughout the entire state of Tennessee. It initially intends to offer facilities-based and resold cellular transport services in service areas that are designated open to competition. It may extend services into other areas that are designated open to competition as it finds additional opportunities.

2. **CTI Fiber Services intends to provide lit and/or dark fiber for cell backhaul services purchased at wholesale from facilities-based carriers and/or fiber providers and resold to other carriers. The Company does not intend to provide Switched Services, including Exchange Access.**
3. There will be no special CPE requirements for the Applicant's services that would not be compatible with an incumbent carrier.
4. Repair and Maintenance:

CTI Fiber Services is responsible for all customer inquiries and complaints. The telephone number for customer inquiries and complaints is (508) 507-6640 and is provided by CTI Fiber Services on the customer bill. Customer service is available seven days a week, twenty-four hours a day by telephone: (919) 415-0959. Customers may contact the company in writing at the headquarters address indicated below.

CTI Fiber Services, LLC
5000 CentreGreen Way, Suite 325
Cary, NC 27513

CTI Fiber Services' VP of Strategic Initiatives, Lisa Linares is responsible for and knowledgeable about provider operations and can be reached at the Applicant's headquarters.

IV. Financial Requirements

In support of its financial qualifications, CTI Fiber Services submits the audited consolidated financial statements of its parent company, CTI Towers, Inc. in **Exhibit F-1** under seal for the most recent year available.

Exhibit F-2 contains the 2-year financial projections for CTI Fiber Services' financial projections for its Tennessee operations.

The Applicant is in the process of obtaining a \$20,000 corporate surety bond which will be filed under separate cover.

V. Small and Minority-Owned Telecommunications Business Participation Plan.

See **Exhibit G**.

VI. TPUC Rules for Local Telecommunications Providers:

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. Please see **Exhibit H**.

VII. Toll Dialing Parity Plan for Applicant's Providing Voice Grade Service:

Not applicable. The Company does not intend to provide switched services and will provide services only as a wholesale carrier.

VIII. Numbering Issues:

1. What is your company's expected demand for NXXs per NPA within a year of approval of your application?

None.
2. How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?

None.
3. When and in what NPA do you expect to establish your service footprint?

The Applicant initially intends to offer service in NPAs currently served by AT&T-Tennessee but will not request numbers in any NPAs.
4. Will the company sequentially assign telephone numbers within NXXs?

Not applicable. The Company does not intend to provide switched services and will not assign telephone numbers.
5. What measures does the company intend to take to conserve Tennessee numbering resources?

Not applicable
6. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?

Not applicable.

IX. Tennessee Specific Operational Issues:

1. How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.

Not applicable. CTI Fiber will not provide switched services.

2. Is the company aware of the Tennessee County Wide Calling database maintained by AT&T-Tennessee and the procedures to enter your telephone numbers on the database?

Not applicable. CTI Fiber will not provide switched services and will not obtain telephone numbers for customers.

3. Is your company aware of the local calling areas provided by the Incumbent Local Exchange Carriers in your proposed service areas?

Yes. The Applicant is aware of local calling areas provided by the Incumbent Local Exchange Carriers within Tennessee but does not intend to provide switched services.

4. Explain the procedures that will be implemented to assure that your customers will not be billed long distance charges for calls within the metro calling areas.

Not applicable. See preceding responses.

5. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TPUC in resolving customer complaints.

Lisa Linares, VP of Strategic Initiatives
CTI Fiber Services, LLC
5000 CentreGreen Way, Suite 325
Cary, NC 27513
Telephone: (919) 893-2841 ext. 413
Email: llinares@ctitowers.com

6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 et seq. and Chapter 1220-4-11?

The Applicant does not intend to telemarket its services in Tennessee.

X. Miscellaneous

1. Pre-filed testimony:

The Applicant has submitted pre-filed testimony with its Application – See **Exhibit J**.

2. Tariffs

Applicant intends to operate pursuant to market regulation, in accordance with amended T.C.A. Section 65-5-109 enacted May 21, 2009.

The Company will not provide exchange access services. Accordingly, it is not submitting a switched access services tariff.

3. Identify all states where certified as a telecommunications provider and the status of states certification is pending.

See **Exhibit I**.

4. Applicant's involvement in any mergers or acquisitions.

CTI Fiber Services is not involved in any mergers or acquisitions.

5. Customer Deposits

CTI Fiber Services does not require customer deposits.

6. Complaint History

The Applicant has not received any complaints filed with state or federal regulatory agencies.

7. Service Area

The Company initially proposes to offer facilities-based and resold cellular transport services in service areas which are designated open to competition.

XI. Public Interest

Grant of CTI Fiber Services, LLC's Application to the services described herein within the state of Tennessee is in the public interest and serves the public convenience and necessity. In enacting the Federal Telecommunications Act of 1996, the United States Congress determined that it is in the public interest to promote competition in the provision of telecommunications services. Experience with competition demonstrates the benefits that competition can bring to consumers. Consumers are enjoying increased services, lower prices, higher quality, and greater reliability. This is true not only with respect to the service offerings of the new entrants, but also as a result of the response of incumbent monopoly providers to the introduction of competition.

CTI Fiber Services' proposed services will provide multiple public benefits by increasing the competitive choices available in Tennessee. Enhanced competition in telecommunications services likely will further stimulate economic development in Tennessee. In addition, increased competition will create incentives for all carriers to offer lower prices, more innovative services, and more responsive customer service.

XII. Statement of Compliance:

CTI Fiber Services, LLC agrees to abide by TCA §65-4-201 and all applicable state statutes and all applicable Orders, Rules and Regulations entered and adopted by the Tennessee Public Utility Commission.

WHEREFORE, CTI Fiber Services, LLC respectfully requests that the Commission enter an Order granting CTI Fiber Services' Application for a Certificate to provide facilities-based and resold cellular transport services within the state of Tennessee.

Respectfully submitted this 28th day of March, 2019.

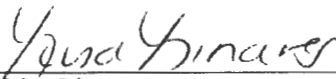


Lisa Linares, VP of Strategic Initiatives
CTI Fiber Services, LLC

VERIFICATION

STATE OF NORTH CAROLINA)
) : ss
COUNTY OF WAKE)

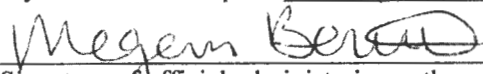
I, Lisa Linares, hereby declare under penalty of perjury, that I am VP of Strategic Initiatives of CTI Fiber Services, LLC, the Petitioner in this proceeding; that I am authorized to make this verification on behalf of CTI Fiber Services; that I have read the foregoing Petition and exhibits; and that the facts stated therein are true and correct to the best of my knowledge, information and belief.



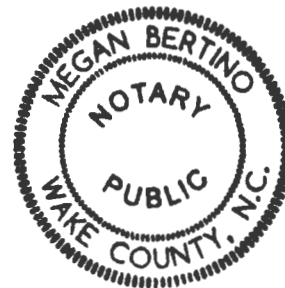
Lisa Linares
VP of Strategic Initiatives
CTI Fiber Services, LLC

Sworn and subscribed before me this 15th day of March, 2019.

My Commission expires 4/11/2023



Signature of official administering oath



CTI FIBER SERVICES, LLC

Exhibit A

Corporate Structure

CTI Fiber Services, LLC is a Delaware Limited Liability Company organized on August 16, 2018. CTI Fiber Services' parent company is CTI Towers, Inc., which is majority owned by Comcast Ventures, L.P. CTI Fiber Services is affiliated with CTI Tower Assets II, LLC, CTI Tower Assets III, LLC and SCI Towers, LLC.

CTI FIBER SERVICES, LLC

Exhibit B

List of Officers

The following individuals are officers of CTI Fiber Services, LLC and may be contacted at the Applicant's headquarters located 5000 CentreGreen Way, Suite 325, Cary, NC 27513.

Officers:

Anthony Peduto	Chief Executive Officer
Shane Ward	Treasurer/CFO
Lisa Linares	VP of Strategic Initiatives
Carrie Ortolano	General Counsel
Loren Stearns	VP of Operations

CTI FIBER SERVICES, LLC

Exhibit C

Articles of Organization

**LIMITED LIABILITY COMPANY AGREEMENT
OF
CTI FIBER SERVICES, LLC**

a Delaware limited liability company

THIS LIMITED LIABILITY COMPANY AGREEMENT (this "Agreement") of CTI Fiber Services, LLC is entered into, as of August 16, 2018, by CTI Towers, Inc., as the sole member of the limited liability company (the "Member").

The Member hereby forms a limited liability company pursuant to and in accordance with the limited liability company laws in the state of Delaware, as amended from time to time (the "Act"), and hereby agrees as follows:

1. **Name.** The name of the limited liability company is CTI Fiber Services, LLC (the "Company").
2. **Purposes.** The Company is formed for the object and purpose of, and the nature of the business to be conducted and promoted by the Company is, engaging in any lawful act or activity for which limited liability companies may be formed under the Act and engaging in any and all activities necessary or incidental to the foregoing.
3. **Registered Office.** The address of the registered office of the Company in the state of Delaware is c/o Comcast Capital Corporation, 1201 N. Market Street, Suite 1000, Wilmington, New Castle County, Delaware 19801.
4. **Registered Agent.** The name and address of the registered agent of the Company for service of process on the Company in the state of Delaware is Comcast Capital Corporation, 1201 N. Market Street, Suite 1000, Wilmington, New Castle County, Delaware 19801.
5. **Powers of the Company.** The Company shall have the power and authority to take any and all actions necessary, appropriate, advisable, convenient or incidental to or for the furtherance of the purposes set forth herein.
6. **Member.** The name and the mailing address of the Member are as follows:

Name:

CTI Towers, Inc.

Address:

5000 CentreGreen Way
Suite 325
Cary, NC 27513
Attention: General Counsel

7. **Management.**

7.1. **Powers of Member.** The Member will have the power on behalf of and in the name of the Company to carry out any and all of the purposes described herein and to perform all acts which it may, in its discretion, deem necessary, appropriate, advisable, convenient or incidental in furtherance of such purposes. There shall not be a "manager" (within the meaning of the Act) of the Company.

7.2. Officers. The Member may, from time to time as it deems advisable, select natural persons and designate them as officers of the Company (the "Officers") and assign titles (including, without limitation, President, Vice President, Secretary and Treasurer) to any such person. Unless the Member provides otherwise, such person shall have the authorities and duties for the assigned office as are specified in the bylaws of Comcast Corporation, as amended from time to time. Any delegation pursuant to this Section may be revoked at any time by the Member. An Officer may be removed with or without cause by the Member. Whenever applicable law or the provisions of this Agreement permits or requires the approval, consent or other action of the Member with respect to the management of the Company, the appropriate Officer appointed pursuant to this Section may take such action in lieu of the Member; provided that no such Officer may act on behalf of the Member.

8. Merger and Conversion. Upon the approval of the Member, the Company may (A) merge with, or consolidate into, another limited liability company or other business entity or (B) convert to a domestic corporation, business trust or association, a real estate investment trust, a common-law trust, a general partnership (including a registered limited liability partnership) or a limited partnership (including a registered limited liability partnership).

9. Dissolution. The Company shall dissolve and its affairs shall be wound up upon the first to occur of the following: (A) the written consent of the Member, or (B) the entry of a decree of judicial dissolution. Neither the commencement of bankruptcy proceedings involving the Member, the outcome thereof, nor an assignment for the benefit of the Member's creditors shall cause the Member to cease to be a member of the Company or cause the dissolution of the Company.

10. Capital Contribution. The Member has contributed \$1,000 in cash and no other property to the Company.

11. Additional Contributions. The Member is not required to make any additional capital contribution to the Company.

12. Allocation of Profits and Losses. The Company's profits and losses shall be allocated solely to the Member.

13. Distributions. Distributions shall be made to the Member at the times and in the amounts determined by the Member. Notwithstanding any provision to the contrary contained in this Agreement, the Company shall not make a distribution to the Member on account of its interest in the Company if such distribution would violate applicable law.

14. Assignments. The Member may assign in whole or in part its limited liability company interest.

15. Resignation. The Member may at any time resign from the Company. If the Member resigns pursuant to this Section, an additional member shall be admitted to the Company, subject to the following Section, upon its execution of an instrument signifying its agreement to be bound by the terms and conditions of this Agreement. Such admission shall be deemed effective immediately prior to the resignation, and, immediately following such admission, the resigning Member shall cease to be a member of the Company.

16. Admission of Additional Members. One or more additional members of the Company may be admitted to the Company with the consent of the Member. Prior to the admission of any such additional member of the Company, the Member shall amend this Agreement to make such changes as the Member shall determine to reflect the fact that the Company shall have more than one member.

17. Limited Liability. Except as otherwise provided by the Act, the debts, obligations and liabilities of the Company, whether arising in contract, tort or otherwise, shall be solely the debts, obligations and liabilities of the Company, and neither the Member nor any Officer shall be obligated personally for any such debt, obligation or liability of the Company solely by reason of being a member or Officer of the Company, respectively.

18. Indemnification.

18.1. Indemnification. The Company shall indemnify the Member, any person who is an Officer of the Company, or any Officer who is or was serving at the request of the Company as a director, officer, employee or agent of another corporation, limited liability company, partnership, joint venture, trust or other enterprise (any such person is hereinafter referred to in this Section 18 as an "Indemnified Person") against expenses (including, but not limited to, attorneys' fees), judgments, fines and amounts paid in settlement, actually and reasonably incurred by such Indemnified Person ("liabilities"), to the fullest extent now or hereafter permitted by law in connection with any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative (as used in this Section 18, "Proceeding" or, in the plural, "Proceedings"), brought or threatened to be brought against such Indemnified Person by reason of the fact that he or she is or was serving in any such capacity or in any other capacity on behalf of the Company, the Member or any of the Company's subsidiaries. The Member by resolution adopted in each specific instance may similarly indemnify any person other than an Indemnified Person (any such person is hereinafter referred to in this Section 18 as an "Other Person") for liabilities incurred by him or her in connection with services rendered by him or her for or at the request of the Company, the Member or any of the Company's subsidiaries. Notwithstanding the foregoing, indemnification of an Indemnified Person shall not be made (i) in any case where the act or failure to act giving rise to the claim for indemnification is determined by a court to have constituted willful misconduct or recklessness; or (ii) in connection with a Proceeding (or part thereof) initiated by an Indemnified Person (except in connection with a Proceeding to enforce a right to indemnification or advancement of expenses under this Article 18), unless required by the Act or otherwise authorized by the Member.

18.2. Advances. Expenses (including, but not limited to, reasonable attorneys' fees) incurred by any Indemnified Person in defending a Proceeding shall be paid by the Company in advance of the final disposition of such Proceeding upon receipt of an undertaking, by or on behalf of such Indemnified Person, to repay such amount without interest if it shall ultimately be determined that he or she is not entitled to be indemnified by the Company as authorized by law. Advance expenses (including, but not limited to, reasonable attorneys' fees) incurred by Other Persons may be paid if the Member deems appropriate and upon such terms and conditions, including the giving of an undertaking, as the Member deems appropriate.

18.3. Applicability; Survival. The provisions of Sections 18.1 and 18.2 shall be applicable to all Proceedings commenced before or after the adoption of this Section 18, whether such arise out of acts or omissions which occurred prior or subsequent to such adoption and shall continue as to a person who has ceased to be an Indemnified Person (or, where and so long as the Member has authorized indemnification or advancement of expenses to an Other Person in accordance with this Section 18, to an Other Person who has ceased to render services for or at the request of the Company, the Member or any of the Company's subsidiaries) and shall inure to the benefit of the heirs, executors and administrators of such a person.

18.4. Insurance. The Company may purchase and maintain insurance on behalf of any person who is or was an Indemnified Person or Other Person against any liability asserted against him or her and incurred by him or her while serving in any such capacity, or in any other capacity on behalf of the Company, the Member or any of the Company's subsidiaries, or arising out of his or her status as

such, whether or not the Company would have the power to indemnify him or her against such liability under law.

18.5. Non-Exclusivity. The indemnification and advancement of expenses provided by or granted pursuant to this Section 18 shall not be deemed exclusive of any other rights to which those seeking indemnification or advancement of expenses may be entitled under this Agreement, other agreement, or otherwise, both as to action or inaction in his or her official capacity and as to action or inaction in another capacity while holding such office.

19. Outside Business. The Member may engage in or possess an interest in other business ventures of any nature or description, independently or with others, similar or dissimilar to the business of the Company, and the Company shall have no rights by virtue of this Agreement in and to such independent ventures or the income or profits derived therefrom, and the pursuit of any such venture, even if competitive with the business of the Company, shall not be deemed wrongful or improper. The Member shall not be obligated to present any particular investment opportunity to the Company even if such opportunity is of a character that, if presented to the Company, could be taken by the Company, and the Member shall have the right to take for its own account (individually or as a partner, shareholder, fiduciary or otherwise) or to recommend to others any such particular investment opportunity.

20. Governing Law. This Agreement shall be governed by, and construed under, the laws of the state of Delaware, without regard to the rules of conflict of laws thereof.

21. Separability of Provisions. Each provision of this Agreement shall be considered separable, and if for any reason any provision or provisions herein are determined to be invalid, unenforceable or illegal under any existing or future law, such invalidity, unenforceability or illegality shall not impair the operation of or affect those portions of this Agreement that are valid, enforceable and legal.

22. Entire Agreement. This Agreement constitutes the entire agreement of the Member with respect to the subject matter hereof.

23. Amendments. This Agreement may not be modified, altered, supplemented or amended except pursuant to a written agreement executed and delivered by the Member.

24. Sole Benefit of Member. The provisions of this Agreement are intended solely to benefit the Member and, to the fullest extent permitted by applicable law, shall not be construed as conferring any benefit upon any creditor of the Company (and no such creditor shall be a third-party beneficiary of this Agreement), and the Member shall have no duty or obligation to any creditor of the Company to make any contributions or payments to the Company.

IN WITNESS WHEREOF, the undersigned has duly executed this Limited Liability Company Agreement as of the day and year first aforesaid.

MEMBER:

CTI Towers, Inc.

By: 
Derek H. Squire, Vice President

CTI FIBER SERVICES, LLC

Exhibit D

Tennessee Secretary of State Authority



Tre Hargett
Secretary of State

**INTESERRA
RECEIVED**

MAR 25 2019

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

INTESERRA CONSULTING GROUP
SHARLI WARD
STE 450
151 SOUTHHALL LN
MAITLAND, FL 32751-7101

March 19, 2019

Request Type: Certificate of Existence/Authorization
Request #: 0309883

Issuance Date: 03/19/2019
Copies Requested: 1

Document Receipt

Receipt #: 004645843 Filing Fee: \$20.00
Payment-Check/MO - INTESERRA CONSULTING GROUP, INC., WINTER PARK, FL \$20.00

Regarding: CTI Fiber Services, LLC

Filing Type: Limited Liability Company - Foreign

Formation/Qualification Date: 01/14/2019

Status: Active

Duration Term: Perpetual

Control #: 1004799

Date Formed: 08/16/2018

Formation Locale: DELAWARE

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

CTI Fiber Services, 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, interest, 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: Cheryl Donnell

Verification #: 032403426

CTI FIBER SERVICES, LLC

Exhibit E

Resumes of Key Management

CTI Fiber Services, LLC Management Biographies

Anthony Peduto, CEO

Tony was named CEO of CTI Towers during the formation of the company and led the effort in the company's sale of 300 towers in March 2015, to Insite Wireless Group. Tony was the former COO of Optasite where he managed the company's operations and tower development in the U.S., Puerto Rico and the U.S.V.I., prior to the company's sale to SBA for \$430M in 2008. Tony also served five years as Vice President of the West and Northeast Regions of American Tower. His involvement with other successful telecommunications and cable television enterprises includes ICS Communications, Tele-Communications, Inc. and American Cablesystems.

Shane Ward, CFO

Shane joined CTI bringing over 18 years of diverse accounting and finance experience in the financial services and tower industries. Before joining CTI, Shane was Director of Corporate Accounting for American Tower Corporation, where he managed the domestic and international accounting teams and consolidated reporting. During his tenure at American Tower, Shane led the finance team through several large acquisitions and finance transactions. Shane is a Chartered Accountant CA(SA).

Lisa Linares, VP of Strategic Initiatives

Lisa joined CTI Towers in 2012 after several years of experience with start-up companies and leading financial institutions. Lisa oversees all of the company's strategic initiatives as they relate to 5G, IoT, edge computing, and fiber to CTI's tower sites. Lisa was previously the company's controller and oversaw all aspects of the finance/accounting department.

Carrie Ortolano, General Counsel

Carrie came to CTI Towers after a distinguished career as outside counsel to the wireless industry, representing carriers, tower companies and DAS providers. Carrie has provided legal counsel in all phases of tower development, including lease negotiations, zoning and regulatory approvals, along with utility and access easements. Carrie holds an unblemished record of approvals for tower sites in the state of Connecticut. Her legal expertise also extends to other industries such as utilities and renewable energy.

Loren Stearns, VP of Operations

Loren has been with CTI for over six years and was promoted to Vice President in January 2018. Loren possesses 19 years of wireless experience having worked on the carrier side for Verizon and T-Mobile, and in the tower, industry working for American Tower prior to joining CTI. In wireless, Loren has been a CAD designer, cell site designer, construction project manager, and a program manager. He is a native of the state of Washington and operates out of Seattle.

CTI FIBER SERVICES, LLC

Exhibit F1

Current Financial Statements

Financial statements are being filed under seal as Confidential.

CTI Towers, Inc. and Subsidiaries

Consolidated Financial Report
December 31, 2018

Contents

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Notes to consolidated financial statements	6-26



Independent Auditor's Report

RSM US LLP

Board of Directors
CTI Towers, Inc. and Subsidiaries

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of CTI Towers, Inc. and Subsidiaries (the Company), which comprise the consolidated balance sheets as of December 31, 2018 and 2017, the related consolidated statements of operations and comprehensive loss, stockholders' equity and cash flows for the years then ended, and the related notes to the consolidated financial statements (collectively, the financial statements).

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of CTI Towers, Inc. and Subsidiaries as of December 31, 2018 and 2017, and the results of its operations and comprehensive loss and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

RSM US LLP

Boston, Massachusetts
March 7, 2019

THE POWER OF BEING UNDERSTOOD
AUDIT | TAX | CONSULTING

CTI Towers, Inc. and Subsidiaries

Consolidated Balance Sheets
December 31, 2018 and 2017

	2018	2017
Assets		
Current assets:		
Cash and cash equivalents	1,121	1,121
Accounts receivable	2,121	2,121
Prepaid expenses and other current assets	1,121	1,121
Investments	1,121	1,121
Property, plant and equipment, net	1,121	1,121
Intangible assets, net	1,121	1,121
Goodwill	1,121	1,121
Other non-current assets	1,121	1,121
Liabilities and equity:		
Current liabilities:		
Accounts payable	1,121	1,121
Accrued liabilities	1,121	1,121
Deferred revenue	1,121	1,121
Long-term debt	1,121	1,121
Other non-current liabilities	1,121	1,121
Equity:		
Common stock	1,121	1,121
Retained earnings	1,121	1,121
Accumulated other comprehensive income	1,121	1,121

See notes to consolidated financial statements.

Consolidated Statements of Operations and Comprehensive Loss
Years Ended December 31, 2018 and 2017

See notes to consolidated financial statements.

Consolidated Statements of Stockholders' Equity
Years Ended December 31, 2018 and 2017[illegible]

CTI Towers, Inc. and Subsidiary

Consolidated Statements of Cash Flows
Years Ended December 31, 2018 and 2017

	2018	2017
Operating activities:		
Net income		
Depreciation and amortization		
Provision for doubtful accounts		
Gain on sale of property		
Loss on disposal of assets		
Change in accounts receivable		
Change in accounts payable		
Change in other assets and liabilities		
Net change in operating assets and liabilities		
Net income from operations		
Investing activities:		
Capital expenditures		
Proceeds from sale of property		
Net change in investing activities		
Financing activities:		
Proceeds from issuance of common stock		
Proceeds from issuance of debt		
Payments of debt		
Net change in financing activities		
Net change in cash and cash equivalents		
Cash and cash equivalents at beginning of year		
Cash and cash equivalents at end of year		

See notes to consolidated financial statements.

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 1. Organization and Operations

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[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]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Notes to Consolidated Financial Statements

E

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Notes to Consolidated Financial Statements

[REDACTED]

[illegible]

Notes to Consolidated Financial Statements

[illegible]

Notes to Consolidated Financial Statements

Notes to Consolidated Financial Statements

[illegible]

Notes to Consolidated Financial Statements

[REDACTED]

The figure is a schematic representation of the experimental design, divided into two main parts: 'Pretest' and 'Main Experiment'.
Pretest: A participant (P) is shown interacting with a screen (S) to learn the location of a target (T) in a 2D space. The screen displays a 2D coordinate system with X and Y axes. The target (T) is located at a specific point in this space. The participant's task is to learn the location of the target by interacting with the screen.
Main Experiment: A participant (P) is shown interacting with a screen (S) to learn the location of a target (T) in a 3D space. The screen displays a 3D coordinate system with X, Y, and Z axes. The target (T) is located at a specific point in this space. The participant's task is to learn the location of the target by interacting with the screen. Below the screen, a 3D coordinate system (X, Y, Z) is shown, indicating the spatial dimensions of the task.

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 9. Notes Payable (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 10. Commitments (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 11. Stockholders' Equity (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 11. Stockholders' Equity (Continued)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Notes to Consolidated Financial Statements

A black and white photograph of a large, multi-story building with a complex facade, featuring many windows and architectural details. The building appears to be a government or institutional structure. The image is somewhat blurry and has a high-contrast, grainy quality.

Notes to Consolidated Financial Statements

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

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

CTI Towers, Inc. and Subsidiaries

Notes to Consolidated Financial Statements

Note 14. 401(k) Savings Plan

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTI FIBER SERVICES , LLC

Exhibit F2

Projected Financial Statements

Projected Financial statements are being filed under seal as Confidential.

CTI Fiber Services, LLC[illegible]

CTI Fiber Services, LLC[illegible]

CTI FIBER SERVICES, LLC

Exhibit G

Small and Minority-Owned Telecommunications Business Participation Plan

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS
BUSINESS PARTICIPATION PLAN**

III. ADMINISTRATION

CTI Fiber Services, LLC'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 CTI Fiber Services' full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Lisa Linares
VP of Strategic Initiatives
CTI Fiber Services, LLC
5000 CentreGreen Way, Suite 325
Cary, NC 27513
Telephone: (919) 893-2841

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 Public Utility Commission.
- (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 Public Utility Commission, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperate with the Tennessee Public Utility Commission, 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 Public Utility Commission.
- (7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.

III. ADMINISTRATION

- (8) Providing information and educational activities to persons within CTI Fiber Services 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

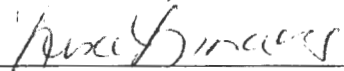
The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small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

IV. RECORDS AND COMPLIANCE REPORTS

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

CTI Fiber Services will submit records and reports required by the Tennessee Public Utility Commission concerning the Plan. Moreover, CTI Fiber Services will cooperate fully with any surveys and studies required by the Tennessee Public Utility Commission.

CTI Fiber Services, LLC

By: 

Lisa Linares

VP of Strategic Initiatives

Dated: March 15, 2019.

CTI FIBER SERVICES, LLC

Exhibit H

Notice of Application

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

IN THE MATTER OF CTI FIBER SERVICES, LLC)
FOR A CERTIFICATE TO PROVIDE FACILITIES-BASED)
AND RESOLD CELLULAR TRANSPORT SERVICES) Docket No. _____
THROUGHOUT THE STATE OF TENNESSEE)

NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECS)

PLEASE TAKE NOTICE, that in accordance with the Tennessee Public Utility Commission Rules for the Provision of Competitive Intrastate Telecommunications Services, you are hereby given notice that on March 29, 2019, CTI Fiber Services, LLC filed an Application for a Certificate of Public Convenience and Necessity to provide competing Cellular Transport Telecommunications Services.

This 2 day of April, 2019.

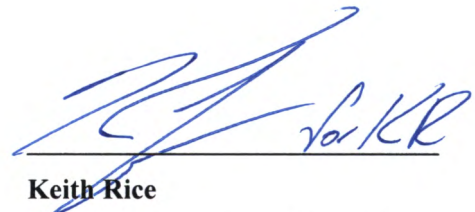


Keith Rice, Shipping Manager to
Inteserra Consulting Group

CERTIFICATE OF SERVICE

- | | | | |
|----|--|-----|---|
| 1. | Ardmore Telephone Company, Inc.
P.O. Box 549
517 Ardmore Avenue
Ardmore, TN 38449 | 10. | Sprint-United
112 Sixth Street
Bristol, TN 37620 |
| 2. | BellSouth Telecommunications, Inc.
333 Commerce Street
Nashville, TN 37201-3300 | 11. | TDS Telecom-Concord Telephone
Exchange, Inc.
P.O. Box 22610
701 Concord Road
Knoxville, TN 37933-0610 |
| 3. | CenturyTel of Adamsville
P.O. Box 405
116 Oak Street
Adamsville, TN 38310 | 12. | TDS-Telecom-Humphreys County
Telephone Company
P.O. Box 552
203 Long Street
New Johnsonville, TN 37134-0552 |
| 4. | CenturyTel of Claiborne
P.O. Box 100
507 Main Street
New Tazewell, TN 37825 | 13. | TDS Telecom-Tellico Telephone
Company
P.O. Box 9
102 Spence Street
Tellico Plains, TN 37385-0009 |
| 5. | CenturyTel of Ooltewah-Collegedale, Inc.
P.O. Box 782
5616 Main Street
Ooltewah, TN 37363 | 14. | TDS Telecom-Tennessee Telephone
Company
P.O. Box 18139
Knoxville, TN 37928-2139 |
| 6. | Citizens Telecommunications Company
of Tennessee
P.O. Box 770
300 Bland Street
Bluefield, WV 24701 | 15. | TDS-Crockett Telephone Company, Inc.
P.O. Box 7
Friendship, TN 38034 |
| 7. | Citizens Telecommunications Company
of the Volunteer State
P.O. Box 770
300 Bland Street
Bluefield, WV 24701 | 16. | TEC-People's Telephone Company, Inc.
P.O. Box 310
Erin, TN 37061 |
| 8. | Loretto Telephone Company, Inc.
P.O. Box 130
Loretto, TN 38469 | 17. | TEC-West Tennessee Telephone
Company, Inc.
P.O. Box 10
244 E Main Street
Bradford, TN 38316 |
| 9. | Millington Telephone Company, Inc.
4880 Navy Road
Millington, TN 38083 | 18. | United Telephone Company
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034 |

I hereby certify that I have this day served a copy of the Application of CTI Fiber Services, LLC upon the listing of incumbent LECs operating in the state of Tennessee listed herein, by mailing such copy by first class mail, postage prepaid.

A handwritten signature in blue ink, appearing to read 'KR' with a large flourish, positioned above a horizontal line.

Keith Rice

Inteserra Consulting Group, Inc.

Date: Apr. 12, 2019

CTI FIBER SERVICES, LLC

Exhibit I

Certification Status

CTI Fiber Services, LLC is in the process of filing applications to provide facilities-based and resold cellular transport telecommunications services in Arizona, Florida, and North Carolina. The Applicant has never been denied or revoked certification.

CTI FIBER SERVICES, LLC

Exhibit J

Pre-filed Testimony of Ms. Lisa Linares

**BEFORE THE
TENNESSEE PUBLIC UTILITIES COMMISSION**

In re: Application of)	
CTI Fiber Services, LLC)	Docket No. _____
For a Certificate to Provide)	
Facilities-Based and Resold Cellular Transport Services)	
Throughout the State of Tennessee)	

**TESTIMONY OF

LISA LINARES

ON BEHALF OF

CTI FIBER SERVICES, LLC**

1 I, Lisa Linares, do hereby testify as follows in support of the Application of CTI Fiber
2 Services, LLC ("CTI Fiber Services") for a Certificate of Convenience and Necessity as a
3 competing telecommunications services provider to provide facilities-based and resold cellular
4 transport services throughout the State of Tennessee.

5
6 **Q. Please state your name and business address.**

7 A. My name is Lisa Linares. My business address is 5000 CentreGreen Way, Suite 325, Cary,
8 NC 27513.

9
10 **Q. By whom are you employed and in what capacity?**

11 A. I am employed by CTI Towers, Inc. and hold the position of Vice President of Strategic
12 Initiatives.

13
14 **Q. Please give a brief description of your background and experience.**

15 A. I joined CTI Towers, Inc. in 2012 after years of experience with start-up companies and
16 leading financial institutions. Until one year ago, I was the company's controller,
17 overseeing all aspects of the finance/accounting department. I am now in charge of the
18 company's strategic initiatives, which includes CTI Fiber Services, LLC. CTI Fiber
19 Services, LLC was formed in August 2018, and is a subsidiary of CTI Towers, Inc.

20
21 **Q. What is the purpose of your testimony?**

22 A. The purpose of my testimony is to present evidence describing the technical, managerial
23 and financial fitness of CTI Fiber Services to provide cellular transport services throughout
24 the State of Tennessee. This testimony will also describe the services proposed by CTI
25 Fiber Services. Finally, the purpose of my testimony is to show that the public interest will
26 be served by approval of the application of CTI Fiber Services, LLC for a certificate of
27 public convenience and necessity.

28
29 **Q. Has CTI Fiber Services registered to do business in Tennessee?**

30 A. Yes. CTI Fiber Services received Secretary of State Authority in Tennessee on 8/16/2018,
31 as a foreign limited liability corporation.

1 **Q. Has CTI Fiber Services previously obtained authority in Tennessee?**

2 A. No.

3

4 **Q. Please describe the services CTI Fiber Services proposes to offer.**

5 A. CTI Fiber Services proposes to offer cellular transport services purchased at wholesale
6 from facilities-based fiber providers and resold to telecommunications carriers, within the
7 State of Tennessee using its own facilities and services available from other facilities-based
8 carriers.

9

10 **Q. How will CTI Fiber Services bill for its services?**

11 A. CTI Fiber Services will bill customers directly.

12

13 **Q. How are trouble reports, billing errors and complaints handled?**

14 A. Once it initiates operations, CTI Fiber Services' a customer service telephone number will
15 be available twenty-four (24) hours per day, seven (7) days per week. The Company's
16 telephone number for customer inquiries, complaints and repair is 1-919-415-0959.
17 Customers may also contact the company in writing at the headquarters address at 5000
18 CentreGreen Way, Suite 325, Cary, NC 27513.

19

20 **Q. Where is CTI Fiber Services currently certificated?**

21 A. CTI Fiber Services is currently certificated in the following states: North Carolina.

22

23 **Q. Describe CTI Fiber Services' financial ability to operate as a local service provider.**

24 A. CTI Fiber Services has sufficient financial resources to provide the requested
25 telecommunications services, the financial capability to maintain these services and to meet
26 its lease obligations. The confidential financial information is provided in the Company's
27 application.

28

29

1 **Q. Does CTI Fiber Services have the managerial and technical qualifications to provide**
2 **local service in Tennessee?**

3 A. Yes. Biographies of key executives and technical personnel are included with the
4 Company's application and demonstrate that the Company has highly experienced and
5 skilled managerial resources to provide the proposed services.
6

7 **Q. Where in Tennessee does CTI Fiber Services intend to offer its services?**

8 A. CTI Fiber Services intends to provide lit and/or dark fiber for cellular transport services
9 purchased at wholesale from facilities-based carriers and/or fiber providers and resold to
10 other carriers throughout the State of Tennessee. The Company does not intend to provide
11 Switched Services, including Exchange Access.
12

13 **Q. How will Tennessee consumers benefit from CTI Fiber Services' services?**

14 A. Certification of CTI Fiber Services will serve the public interest and offer several benefits
15 to telecommunication customers in Tennessee. Experience with competition in other
16 telecommunications markets demonstrates the benefits that competition can bring to
17 consumers. CTI Fiber Services' proposed services will provide multiple public benefits
18 by increasing the competitive choices available to telecommunications carriers in
19 Tennessee by providing cellular transport services from CTI Towers' tower sites to the
20 carriers designated hand off locations. This service will bring the carriers'
21 telecommunications services to the public market with increased efficiency. Enhanced
22 competition in telecommunications services likely will further stimulate economic
23 development in Tennessee.
24

25 **Q. Does this conclude your testimony?**

26 A. Yes.

1
2
3 **VERIFICATION**
4
5

6 **STATE OF DELAWARE**

§

7 §

8 **COUNTY OF NEW CASTLE**

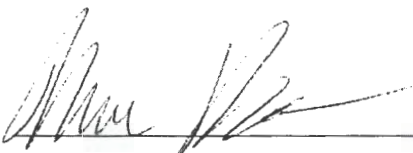
§
9
10

11 I, Lisa Linares, first being duly sworn upon oath, depose and say that I am the Vice President of
12 Strategic Initiatives of CTI Fiber Services, LLC that I have read the above and foregoing pre-filed
13 testimony by me subscribed and know the contents thereof; that said contents are true in substance
14 and in fact, except to those matters stated upon information and belief, and as to those, I believe
15 same to be true.
16

17 
18 _____

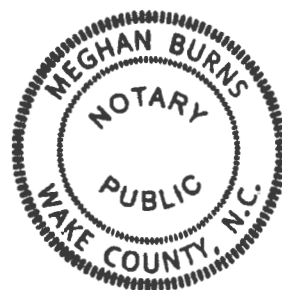
19 Lisa Linares, Vice President of Strategic Initiatives
20 CTI Fiber Services, LLC
21
22
23

24 Taken, sworn to and subscribed before me this 26th day of March, 2019.
25

26 
27 _____

28 Notary Public in and for said County

29 My Commission expires on the 4th day of March, ²⁰²³2019.



CTI FIBER SERVICES, LLC

Exhibit K

Tariffs

CTI Fiber Services intends to operate pursuant to market regulation, in accordance with amended T.C.A. Section 65-5-109 enacted May 21, 2009.