



Via Overnight Delivery

RECEIVED
2019 FEB 31 AM 11:57
February 27, 2020
T.P.U.C. DOCKET ROOM

Docket No. 19-00091

Chairman Herbert H. Hilliard
c/o Victoria Lawless
Tennessee Public Utility Commission
Andrew Jackson State Office Building 502
Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Docket No. 19-00091 - Application of Altaworx, LLC for Certificate to Resell Telecommunications Services in Tennessee

Dear Chairman Hilliard:

This cover letter and the attached documents are being provided to the Commission in response to a letter the Applicant received on October 16, 2019 regarding the initial submission for the Applicant. Additionally, this letter and the attachments provide clarification in order for the Commission to approve the Applicant's request for approval regarding a Certificate to resell telecommunications services in the state of Tennessee.

Responses to the letter dated October 16th, 2019 are as follows:

1. The application submitted on behalf of Altaworx, LLC is for Resale Authority. The Applicant does not seek facilities-based authority.
2. Please note the enclosed check of \$25.00 which when added to the previously sent \$25.00 check with the Application supports the full Application fee for resale authority of \$50.00.
3. The Applicant does not need to provide formal service to the seventeen (17) incumbent carriers in the state of Tennessee since the Applicant is seeking resale authority and not facilitates-based authority.
4. The bond as included now includes the name and title of the signatory as Rickie Richey CEO under Mr. Richey's signature.

5. Please note the enclosed Certificate of Good Standing for Alabama as requested by the Commission.

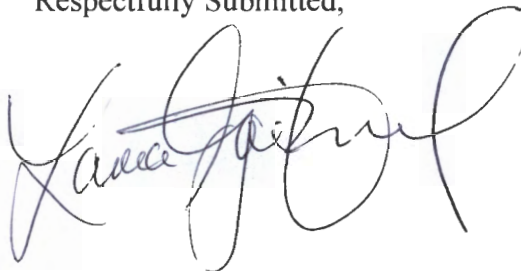
6. Please note the certificate of Existence of the state of Tennessee as requested by the Commission.

Please note enclosed is 1 original submission of this filing and representative documents along with thirteen (13) copies in accordance with Commission guidelines and requirements.

Additionally, the Applicant would like to thank the Commission for the kind consideration in extending the docket dates to ultimately meet data request which is hereby, now being submitted to the Commission. And specifically Applicant would like to recognize Lisa Foust for her support, invaluable assistance and patience with the Applicant's filing.

Should you have any questions concerning this filing, please do not hesitate to contact the undersigned at 973-760-9218.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Laura Garfinkel', with a large, stylized flourish extending from the end.

Laura Garfinkel
Senior Advisor & Client Liaison
Global Strategic Accountants ("GSA")
6250 Shiloh Road
Alpharetta GA, 30005
Phone: 973-760-9218
Fax: 866-611-5443
Email:
Laura@gsaudits.com
Attorney in Fact for Altaworx, LLC

EXHIBIT A

Altaworx, LLC - Bond

TENNESSEE PUBLIC UTILITY COMMISSION

TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND

Bond #: 3465984

WHEREAS, ALTAWORX, LLC (the "Principal"), has applied to the Tennessee Public Utility Commission for authority to provide telecommunications services in the State of Tennessee; and

WHEREAS, under the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated, as amended, the Principal is required to file this bond in order to obtain such authority and to secure the payment of any monetary sanction imposed in any enforcement proceeding brought under Title 65 of the Tennessee Code Annotated or the Consumer Telemarketing Act of 1990 by or on behalf of the Tennessee Public Utility Commission (the "TPUC"); and

WHEREAS, SureTec Insurance Company (the "Surety"), a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, has agreed to issue this bond in order to permit the Principal to comply with the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated;

NOW THEREFORE, BE IT KNOWN, that we the Principal and the Surety are held and firmly bound to the STATE OF TENNESSEE, in accordance with the provisions of Tennessee Code Annotated, Title 65, Chapter 4, Section 125(j), in the full amount of twenty thousand dollars (\$20,000.00) lawful money of the United States of America to be used for the full and prompt payment of any monetary sanction imposed against the Principal, its representatives, successors or assigns, in any enforcement proceeding brought under Title 65 of Tennessee Code Annotated or the Consumer Telemarketing Act of 1990, by or on behalf of the TPUC, for which obligation we bind ourselves, our representatives, successors and assigns, each jointly and severally, firmly and unequivocally by these presents.

This bond shall become effective on the 06th day of September, 2019, and shall be continuous; provided, however, that each annual renewal period or portion thereof shall constitute a new bond term. Regardless of the number of years this bond may remain in force, the liability of the Surety shall not be cumulative, and the aggregate liability of the Surety for any and all claims, suits or actions under this bond shall not exceed Twenty Thousand Dollars (\$20,000.00). The Surety may cancel this bond by giving thirty (30) days written notice of such cancellation to the TPUC and Principal by certified mail, it being understood that the Surety shall not be relieved of liability that may have accrued under this bond prior to the date of cancellation.

PRINCIPAL

ALTAWORX, LLC
Name of Company authorized by the TPUC

Company ID # as assigned by TPUC

SIGNATURE OF PRINCIPAL

Name: RICKIE RICHY
Title: CEO, ALTAWORX, LLC.

SURETY

SureTec Insurance Company
Name of Surety

2103 CityWest Boulevard Suite 1300 Houston Texas 77042 United States
Address of Surety

SIGNATURE OF SURETY AGENT

Name: JOHN D. WEISBROT
Title: Attorney-In-Fact

Address of Surety Agent:
6023A Kellers Church Road PIPERSVILLE Pennsylvania 18947 United States



THIS BOND IS ISSUED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 125, CHAPTER 4, TITLE 65 OF THE TENNESSEE CODE ANNOTATED AS AMENDED BY CHAPTER NO. 586, 2000 PUBLIC ACTS. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL. (POWER OF ATTORNEY FROM AN APPROVED INSURANCE COMPANY MUST BE ATTACHED.)

ACKNOWLEDGMENT OF PRINCIPAL

STATE OF Alabama
COUNTY OF Baldwin

Before me, a Notary Public of the State and County aforesaid, personally appeared Rickie L. Riches with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of SureTec Insurance Company, and he acknowledged to me that he executed the same.

WITNESS my hand and seal this 18th day of September, 2019.

My Commission Expires:

January 5, 2021

[Signature]
Notary Public

ACKNOWLEDGMENT OF SURETY

STATE OF Pennsylvania
COUNTY OF BUCKS

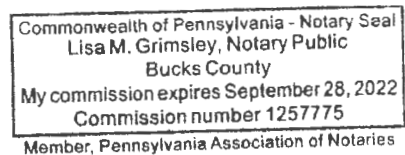
Before me, a Notary Public of the State and County aforesaid, personally appeared John D. Weisbrot with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of SureTec Insurance Company, the within named Surety, a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, and that he as such an individual being authorized to do so, executed the foregoing bond, by signing the name of the corporation by himself and as such individual.

WITNESS my hand and seal this 16th day of September, 2019.

My Commission Expires:

_____, 2000

[Signature]
Notary Public



APPROVAL AND INDORSEMENT

This is to certify that I have examined the foregoing bond and found the same to be sufficient and in conformity to law, that the sureties on the same are good and worth the penalty thereof, and that the same has been filed with the Tennessee Public Utility Commission, State of Tennessee, this _____ day of _____, 20____.

Name:

Title:

SureTec Insurance Company

LIMITED POWER OF ATTORNEY

Know All Men by These Presents, That SURETEC INSURANCE COMPANY (the "Company"), a corporation duly organized and existing under the laws of the State of Texas, and having its principal office in Houston, Harris County, Texas, does by these presents make, constitute and appoint

John D. Weisbrot, Melissa L. McDade, Steven M. Varga

its true and lawful Attorney-in-fact, with full power and authority hereby conferred in its name, place and stead, to execute, acknowledge and deliver any and all bonds, recognizances, undertakings or other instruments or contracts of suretyship to include waivers to the conditions of contracts and consents of surety for, providing the bond penalty does not exceed

Five Hundred Thousand and 00/100 Dollars (\$500,000.00)

and to bind the Company thereby as fully and to the same extent as if such bond were signed by the CEO, sealed with the corporate seal of the Company and duly attested by its Secretary, hereby ratifying and confirming all that the said Attorney-in-Fact may do in the premises. Said appointment is made under and by authority of the following resolutions of the Board of Directors of the SureTec Insurance Company:

Be it Resolved, that the President, any Vice-President, any Assistant Vice-President, any Secretary or any Assistant Secretary shall be and is hereby vested with full power and authority to appoint any one or more suitable persons as Attorney(s)-in-Fact to represent and act for and on behalf of the Company subject to the following provisions:

Attorney-in-Fact may be given full power and authority for and in the name of and of behalf of the Company, to execute, acknowledge and deliver, any and all bonds, recognizances, contracts, agreements or indemnity and other conditional or obligatory undertakings and any and all notices and documents canceling or terminating the Company's liability thereunder, and any such instruments so executed by any such Attorney-in-Fact shall be binding upon the Company as if signed by the President and sealed and effected by the Corporate Secretary.

Be it Resolved, that the signature of any authorized officer and seal of the Company heretofore or hereafter affixed to any power of attorney or any certificate relating thereto by facsimile, and any power of attorney or certificate bearing facsimile signature or facsimile seal shall be valid and binding upon the Company with respect to any bond or undertaking to which it is attached. (Adopted at a meeting held on 20th of April, 1999.)

In Witness Whereof, SURETEC INSURANCE COMPANY has caused these presents to be signed by its CEO, and its corporate seal to be hereto affixed this 7th day of November, A.D. 2018.

SURETEC INSURANCE COMPANY

By: _____

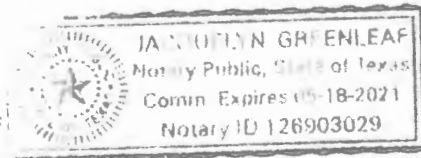
John Knox Jr., CEO

State of Texas
County of Harris

ss:



On this 7th day of November, A.D. 2018 before me personally came John Knox Jr., to me known, who, being by me duly sworn, did depose and say, that he resides in Houston, Texas, that he is CEO of SURETEC INSURANCE COMPANY, the company described in and which executed the above instrument; that he knows the seal of said Company; that the seal affixed to said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said Company; and that he signed his name thereto by like order.



Jacquelyn Greenleaf, Notary Public
My commission expires May 18, 2021

I, M. Brent Beaty, Assistant Secretary of SURETEC INSURANCE COMPANY, do hereby certify that the above and foregoing is a true and correct copy of a Power of Attorney, executed by said Company, which is still in full force and effect; and furthermore, the resolutions of the Board of Directors, set out in the Power of Attorney are in full force and effect.

Given under my hand and the seal of said Company at Houston, Texas this 16th day of September, 2019, A.D.

M. Brent Beaty, Assistant Secretary

Any instrument issued in excess of the penalty stated above is totally void and without any validity. 3810001
For verification of the authority of this power you may call (713) 812-0800 any business day between 8:30 am and 5:00 pm CST.



SureTec Insurance Company
1330 Post Oak Blvd., Suite 1100
Houston, TX. 77056

FINANCIAL STATEMENT
as of December 31, 2017
Statutory Basis

Bonds	\$ 136,016,880	Reserve for Losses and Loss Expense	\$ 12,474,054
Stocks	25,314,413	Reserve for Unearned Premiums	36,903,494
Cash & Short Term Investments	80,304,186	Other Liabilities	101,806,443
Agents Balances or Uncollected Premiums	6,483,751	TOTAL LIABILITIES	151,183,991
Other Admitted Assets	5,120,359		
		Capital Stock	5,000,000
		Surplus	97,055,598
		TOTAL POLICYHOLDERS SURPLUS	102,055,598
TOTAL ASSETS	\$ 253,239,589	TOTAL LIABILITIES AND POLICYHOLDERS SURPLUS	\$ 253,239,589

Bonds and stocks are valued in accordance with the basis adopted by the National Association of Insurance Commissioners.
Securities carried in the above statement are deposited as required by law.

CERTIFICATE

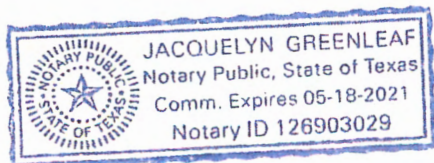
David Allen Wisnoski, Treasurer, and Michael Charles Keimig, Secretary, of the SureTec Insurance Company, being duly sworn each for himself, deposes and says that they are the above described officers of the said Company and that on the 31st day of December, 2017, the Company actually possessed the assets set forth in the foregoing financial statement, except as hereinbefore indicated, and that the foregoing statement is a correct exhibit of such assets and liabilities of said Company on the 31st day of December, 2017, according to the best of their information, knowledge and belief.

President

Treasurer

STATE OF TEXAS
COUNTY OF HARRIS

On this 20th day of February, 2018, before me came the above named officers of SureTec Insurance Company to me known to be the individuals and officers described herein, and acknowledge that they executed the foregoing instrument and affixed the seal of the corporation thereto by the authority of their office.



Notary Public

EXHIBIT B

Altaworx, LLC

Certificate of Good Standing for Alabama



State of Alabama
Department of Revenue

Certificate of Compliance

Altaworx, LLC is found to be in compliance for purposes of the issuance of a Certificate of Compliance from the Alabama Department of Revenue. An examination of the Alabama Department of Revenue's records for the following accounts: Corporate Income, Excise, Pass Through Entity, Business Privilege, Business & License Tax, Withholding, International Fuel Tax Agreement, International Registration Plan, and Sales and Use Tax, reveals that the aforementioned taxpayer/entity has filed all applicable tax returns and paid the tax or taxes, interest amounts, and any penalties that were reported due for all tax returns, assessments, and/or audit liabilities that were owed, as of February 03, 2020. No representation is made as to the accuracy of the amounts reported. Like all taxpayers, this taxpayer is subject to audit and billing for additional amounts for periods within the statute of limitations.

*IN WITNESS WHEREOF, I hereunto set my hand this
date of February 03, 2020.*

Curtis E. Stewart

Disclosure Officer

Phone: 334-242-1189

Fax: 334-242-1030

Request Date: February 03, 2020

Request Code: 20020322310483

John H. Merrill
Secretary of State

P.O. Box 5616
Montgomery, AL 36103-5616

STATE OF ALABAMA

I, John H. Merrill, Secretary of State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that

the entity records on file in this office disclose that AltaWorx LLC was formed in Baldwin County, Alabama on October 14, 2008. The Alabama Entity Identification number for this entity is 426-324. I further certify that the records do not disclose that said entity has been dissolved, cancelled or terminated.



20200115000003216

In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the city of Montgomery, on this day.

01/15/2020

Date

J. H. Merrill

John H. Merrill

Secretary of State

EXHIBIT C

Altaworx, LLC

State of Tennessee Certificate of Existence



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

GLOBAL STRATEGIC ACCOUNTANTS, LLC
6250 SHILOH ROAD
ALPHARETTA, GA 30005

February 3, 2020

Request Type: Certificate of Existence/Authorization
Request #: 0348881

Issuance Date: 02/03/2020
Copies Requested: 1

Document Receipt

Receipt #: 005248485

Filing Fee: \$20.00

Payment-Credit Card - State Payment Center - CC #: 3774790337

\$20.00

Regarding: Altaworx LLC

Filing Type: Limited Liability Company - Foreign

Control #: 835748

Formation/Qualification Date: 02/22/2016

Date Formed: 10/14/2008

Status: Active

Formation Locale: ALABAMA

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

Altaworx 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 filed the most recent annual report required with this office;

* 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 #: 037696634