



Electronically Filed in TPUC Docket Room
on September 13, 2021 at 12:57 p.m.

August 25, 2020

Tory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Application of UNITED COMMERCIAL TELECOM, LLC
for a Certificate of Convenience and Necessity
TPUC Docket No. 21-00108

Dear Chairman Morrison:

Enclosed please find the *Application of UNITED COMMERCIAL TELECOM, LLC for a Certificate of Convenience and Necessity* to offer Access telecommunications services in Tennessee and a check **in** the amount of \$25.00 for the required filing fee.

This Application has been filed via e-mail with a hard copy of this letter and the filing fee.

Please contact me if you have any questions about this application.

Sincerely,

/s/ Joseph Isaacs
Regulatory Affairs for United Commercial Telecom, LLC

Sincerely yours,

/Joseph Isaacs/

10020 Milano Drive, Trinity, Florida 34655
Regulatory Attorneys & Consultants
Phone: (727) 738-5553
www.isg-telecom.com

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

Application of

UNITED COMMERCIAL TELECOM, LLC

For a Certificate to Provide

Access Telecommunications

Services throughout the State of Tennessee

Docket No. **21-00108**

**APPLICATION OF UNITED COMMERCIAL TELECOM, LLC TO PROVIDE
ACCESS TELECOMMUNICATIONS SERVICES**

UNITED COMMERCIAL TELECOM, LLC, ("UCT" or "Applicant") respectfully requests that the Tennessee Public Utility Commission (the "Commission") grant to "UCT" a certificate of convenience and necessity to provide access telecommunications services within the State of Tennessee. UCT is willing and able to comply with all applicable Commission policies, rules and orders pertaining to the provision of competing local telecommunications services.

Applicant submits the following information in support of its application:

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

UNITED COMMERCIAL TELECOM, LLC

725 Primera Blvd, Suite 120

Lake Mary, FL 32746

Telephone: (407) 221-1027

www.unitedcommercial.net

Questions regarding this application should be directed to:

Joseph Isaacs, CEO

% ISG-Telecom Consultants

10020 Milano Drive

Trinity, FL 34655

Telephone: (727) 738-5553

Email: isaacs@isg-telecom.com

Contact name and address at the Company is:

Mark Schuh, President
UNITED COMMERCIAL TELECOM, LLC
725 Primera Blvd, Suite 120
Lake Mary, FL 32746
Telephone: (407) 221-1027
E-Mail: mschuh@unitedcommercial.net

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

Applicant is a privately held entity with corporate offices based in Florida. Applicant does not have any affiliates, or subsidiaries, but does have a parent company. A copy of Applicant's Organizational Chart is attached hereto as **Exhibit A**.

3. Corporate Information

Applicant is a Florida Limited liability company organized on November 29, 2016. See Certificate of Formation in **Exhibit B**. A copy of Applicant's authority to transact business in the State of Tennessee is provided in **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. Applicant 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 financial ability to render the access telecommunications services for which this Application is submitted. In support of its financial qualifications, Applicant submits its financial report of its corporate parent, provided in **Exhibit F**.

In accordance with T.C.A. § 65-4-1250), Applicant will submit a corporate surety bond or irrevocable letter of credit, if applicable, prior to providing service.

B. Managerial Ability:

As previously shown on **Exhibit E** of this Application, Applicant has the managerial expertise to successfully operate a telecommunications enterprise in Tennessee. Applicant's management team has

extensive management and business experience in telecommunications.

C. Technical Qualifications

Applicant will satisfy the standards established by the Commission, including quality of service and billing standards required of all LEC's regulated by the agency. As noted in the biographies in **Exhibit E**, the principal officers of the company include many individuals with several years of telecommunications expertise. Thus, Applicant is technically qualified to provide access services throughout Tennessee.

5. Proposed Service Areas

Applicant seeks authority to provide access telecommunications services on a statewide basis.

6. Types of Service to be Provided

Applicant seeks authority to enter the Tennessee market as a provider of limited facilities-based access services. Applicant intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs.

7. Repair and Maintenance

Applicant understands the importance of effective customer service for customers. Applicant will make arrangements for its customers to call the company at 407-221-1027, its customer service number. In addition, customers will be able to contact the company in writing at the headquarters address, as well as via email. The toll-free number will be provided on each customer's agreement for services. The customer service contact person knowledgeable about Applicant's operations is Adam Woodward, Operations Director. Mr. Woodward's mailing address, telephone number, and email address are in Section 1 of this Application.

8. Small and Minority-Owned Telecommunications Business Participation Plan (T.C.A. § 65-5-112):

See **Exhibit G**.

9. Toll Dialing Parity Plan:

Applicant has no intention of providing TDM telephone service but in the event it does in the future, the Applicant will provide toll dialing parity.

10. Notice of Filing:

Applicant has served notice of this Application on the seventeen (17) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operating geographically. See **Exhibit H** for the Notice of Filing and list of carriers served.

11. Numbering Issues:

Should the Applicant provide TDM telephone service in the future, at the request of a customer, the Applicant will comply with the Commission's rules on number assignment and conservation.

12. Tennessee Specific Operational Issues:

Questions 1-4 concerning Tennessee Specific Operational Issues are not applicable to the Access services Applicant intends to offer. Should the Applicant provide TDM telephone service at the request of a customer, the Applicant will comply with all Commission operational requirements, including those listed here. Adam Woodward will be responsible to work with the Commission on resolving customer complaints. His contact information is in Section **1** of this Application. Applicant does not intend to engage any telemarketing its services in Tennessee.

13. Miscellaneous:

- a. Sworn Pre-Filed Testimony: **Exhibit I.**
- b. Applicant will not require customer deposits.
- c. Applicant is not a recently formed entity, Applicant is authorized to operate in the States of Florida, Georgia, North Carolina and Pennsylvania. Applicant has a similar pending application in Texas. Applicant has not been denied requested certification in any jurisdiction. Applicant has not been subject to complaints, related to telecommunications services, in any of the states in which it is now seeking to do business.
- d. Subsequent to the approval of this Application, Applicant will file any necessary tariffs prior to providing the proposed services covered by this Application.

CONCLUSION

Grant of the Application will further the goals of the Tennessee Legislature and further the public interest by expanding the availability of competitive access telecommunications services in the State of Tennessee. In addition, intrastate offering of these services is in the public interest because the services will provide Tennessee customers increased efficiencies and cost savings. Authorizing Applicant to provide telecommunications services will enhance materially the telecommunications infrastructure in the State of Tennessee and will facilitate economic development.

UCT respectfully requests that the Commission enter an order granting it a certificate of convenience and necessity to operate as an access telecommunications service provider and authority to provide a full range of access services on a facilities-based basis throughout the State of Tennessee. UCT also respectfully requests expedited treatment for approval of its application. For the reasons stated above, UCT'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.

**VERIFICATION AND SWORN STATEMENT ON BEHALF OF
UNITED COMMERCIAL TELECOM, LLC**

My name is Mark Schuh. I am President of UNITED COMMERCIAL TELECOM, LLC ("UCT" or "Applicant"). My personal knowledge of the facts stated herein has been derived from my employment with Applicant.

I affirm that UNITED COMMERCIAL TELECOM, LLC:

- agrees to comply with all federal and state statutes, rules, and regulations for a Certificate to Provide Access Telecommunications Services, if granted the request as stated in this application.
- certifies that all answers to the attached Application are true and correct; and

I affirm and declare under penalty of perjury under the laws of the State of Florida, that, to the best of my knowledge, all of the statements and representations made in this Application

STATE OF FLORIDA }
 }
COUNTY OF HILLSBOROUGH }

Mark Schuh, President
UNITED COMMERCIAL TELECOM, LLC

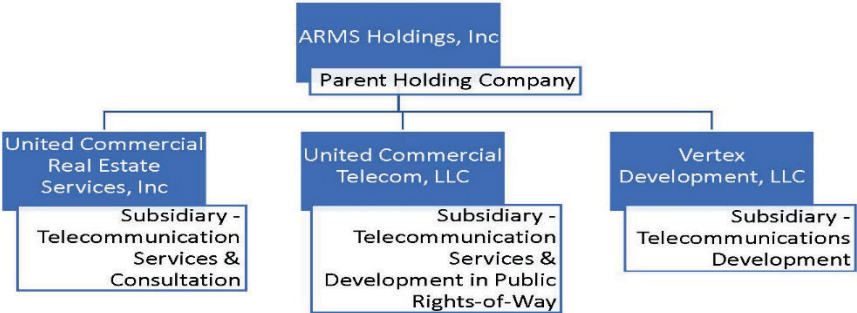
Subscribed and sworn to me a Notary Public

(Title of person authorized to administer oath)

In the State and County above named this _____ day of _____, 2021.

(Signature of person authorized to administer oath)

EXHIBIT A
Organizational Chart of Business Structure



EXHIBITB

Certificate of Formation

**Electronic Articles of Organization
For
Florida Limited Liability Company**

**L16000216599
FILED 8:00 AM
November 29, 2016
Sec. Of State
jafason**

Article I

The name of the Limited Liability Company is:

UNITED COMMERCIAL TELECOM, LLC

Article II

The street address of the principal office of the Limited Liability Company is:

405 S. DALE MABRY HWY. #244
TAMPA, FL. 33609

The mailing address of the Limited Liability Company is:

405 S. DALE MABRY HWY. #244
TAMPA, FL. 33609

Article III

The name and Florida street address of the registered agent is:

ALAN RUIZ
405 S. DALE MABRY HWY. #244
TAMPA, FL. 33609

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: ALAN RUIZ

Article IV

The name and address of person(s) authorized to manage LLC:

Title: MGRM
ALAN RUIZ
405 S. DALE MABRY HWY. #244
TAMPA, FL. 33609

Title: MGRM
MARK SCHUH
405 S. DALE MABRY HWY. #244
TAMPA, FL. 33609

L16000216599
FILED 8:00 AM
November 29, 2016
Sec. Of State
jafason

Signature of member or an authorized representative

Electronic Signature: ALAN RUIZ

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

EXHIBIT C

Authority to Transact Business in Tennessee



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

UNITED COMMERCIAL TELECOM, LLC
STE 120
725 PRIMERA BLVD
LAKE MARY, FL 32746-2126

August 13, 2021

Filing Acknowledgment

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

SOS Control #:	001224945	Formation Locale:	FLORIDA
Filing Type:	Limited Liability Company - Foreign	Date Formed:	11/29/2016
Filing Date:	07/30/2021 6:06 PM	Fiscal Year Close:	12
Status:	Active	Annual Report Due:	04/01/2022
Duration Term:	Perpetual	Image #:	B1072-5726
Managed By:	Member Managed		

Document Receipt

Receipt # : 006540580	Filing Fee:	\$300.00
Payment-Credit Card - State Payment Center - CC #: 3811428477		\$300.00

Registered Agent Address:
UNITED STATES CORPORATION AGENTS, INC.
STE 308
4295 CROMWELL RD
CHATTANOOGA, TN 37421-2163

Principal Address:
STE 120
725 PRIMERA BLVD
LAKE MARY, FL 32746-2126

Congratulations on the successful filing of your Application for Certificate of Authority for UNITED COMMERCIAL TELECOM, LLC in the State of Tennessee which is effective on the date shown above. Please visit the Tennessee Department of Revenue website (www.tn.gov/revenue) 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.

Processed By: McKesha Agee


Tre Hargett
Secretary of State



001224945

**APPLICATION FOR CERTIFICATE OF AUTHORITY
LIMITED LIABILITY COMPANY**

SS-4233



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***- FILED -**

Control # 001224945

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:** UNITED COMMERCIAL TELECOM, 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:** FLORIDA
and the date (mm/dd/yyyy) of its formation is: 11/29/2016
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:** None

- 4. The name and complete address of its registered agent and office located in the state of Tennessee is:**
UNITED STATES CORPORATION AGENTS, INC.
STE 308
4295 CROMWELL RD
CHATTANOOGA, TN 37421-2163
HAMILTON 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:** 2

- 9. Period of Duration:** Perpetual

- 10. The complete address of its principal executive office is:**
STE 120
725 PRIMERA BLVD
LAKE MARY, FL 32746-2126

B1072-5726 07/30/2021 6:06 PM Received by Tennessee Secretary of State Tre Hargett

EXHIBITD

Names and Addresses of Principle Officers

Applicant's officers are listed below. The business address of the following individuals is:

Alan Ruiz, MGR, Owner
725 Primera Blvd, Suite 120
Lake Mary, FL 32746

Mark C Schuh, MGR, President
725 Primera Blvd, Suite 120
Lake Mary, FL 32746

Listing of Owners:
ARMS Holdings, Inc.
725 Primera Blvd, Suite 120
Lake Mary, FL 32746

Listing of Owners, ARMs Holdings, Inc.

Alan Ruiz, MGR, 50% Ownership Share
725 Primera Blvd, Suite 120
Lake Mary, FL 32746

Mark Schuh, MGR, 50% Ownership share
725 Primera Blvd, Suite 120
Lake Mary, FL 32746

EXHIBITE

Biographies of Principle Officers and Key Technical Staff

Mark C. Schuh

Education

BA University of South Florida – English Literature
MURP Florida Atlantic University – Masters of Urban and Regional Planning

Emphasis on Real Estate Development. Awarded FIU/FAU Joint Center Fellowship.

Summary

Mark C Schuh has almost 25 years of telecommunication infrastructure experience. Mr. Schuh began his career working for a small infrastructure real estate company specializing in cell site deployment. Later, Mr. Schuh became the Real Estate Manager for Sprint during their initial service deployment in Central Florida. Mr. Schuh then formed his own company United Commercial. United Commercial is a full turnkey company that was formed in 2002. Since that time Mr. Schuh and United Commercial have worked on thousands of communication projects. United Commercial has performed the following services for the following companies:

Services: New Cell Site Selection, Acquisition, Zoning and Permitting
 Cell Site Modifications, Generator Additions
 Fiber deployment in right-of-ways
 Fiber Permitting, Fiber to Cell, Easement Procurement
 Small Cell, IDas and ODas deployment
 Project and Construction Management Services.

Main Clients: AT&T
 T-Mobile
 Sprint
 Mastec
 General Dynamics
 Goodman Networks
 Nokia

Mark Schuh is also co-owner of Vertex Development. Vertex Development builds and owns communication towers in the Southeast.

Areas of Expertise

Site Selection and Acquisition – Locating and acquiring properties for telecommunications infrastructure.

Nimby (not in my backyard) issues – Working with communities and government to site infrastructure perceived as having negative impacts.

Zoning and Permitting – Completing governmental processes including public hearings to receive appropriate entitlements.

Project and Construction Management – Mr. Schuh has managed the daily processes for hundreds of communication projects.

Substantive expert knowledge with respect to communication infrastructure deployment and operations.

CLEC operations – Mr. Schuh has been managing CLEC's in multiple jurisdictions for the past 5 years.

Alan Ruiz

Tampa, FL

813-335-4768

alanruiz@vertexdevelopment.n



Summary

With over 24 years of experience in the wireless industry, Mr. Ruiz has developed hundreds of towers around the country and has held positions ranging from Site Acquisition and Market Director to Owner- Developer. In 2004, with a goal of becoming the premier small business owner-operator of wireless towers, founded Vertex Development, LLC. Over the last seventeen years, Vertex has achieved its goal of building towers across the entire state while providing infrastructure to all national and regional wireless service providers. Over the past several years, Mr. Ruiz has entered the small cell arena via United Commercial Telecom, LLC, and has completed several large projects.

Professional Profile

- Director/ President of ARMS Holdings, Inc. (2013 – present)
 - ARMS is the parent company of three subsidiaries:
 - Vertex Development, LLC (directly manages)
 - United Commercial Real Estate Services, Inc.
 - United Commercial Telecom, LLC (co-manages)
- Managing Member of United Commercial Telecom, LLC (2016 – present)
 - Obtained LEC licensure in several states
 - Negotiated contracts for small cell projects
 - Oversaw small cell development in public rights-of-way
- Owner/Manager of Vertex Development, LLC (2004 – present)
 - Founded Vertex in 2004
 - Developed, owned and operated telecommunications towers across Florida
 - Catered to all national wireless service providers with build-to-suit and greenfield towers
 - Experience with private and public land development
- Vice President, Development, for ClearShot Communications (2001 – 2004)
 - Oversaw the development of over 300 sites across 27 states
 - Area Manager for new towers in Florida and Texas
 - Managed development of new sites in New England, Central, and West Coast Markets
- Co-Founder and Vice President of Acme Towers, Inc. (1997 – 2000)
 - Developed approximately 60 sites throughout Florida
 - Director of Marketing and Client Relationships
 - Entitlements Manager – zoning and permitting
 - Leasing Manager – negotiated ground and tenant leases
- Analyst for Andersen Consulting (1996 – 1997)
 - Computer Programmer
 - Data Repair

Education

- Bachelor of Science in Finance, *Magna Cum Laude*, Florida International University
- University of Florida, various undergraduate coursework

Jennifer Frost

CAREER HIGHLIGHTS

- ☐ 13+ years of progressive project/program management experience in the wireless/CLEC industry
- ☐ Directed dozens of raw land tower projects (NSB & BTS)
- ☐ Adept at reprioritization of activities to achieve valuable productivity
- ☐ Honed leadership competencies, including positive and consistent communication strategies
- ☐ Streamlined project processes for elevated quality standards
- ☐ Skilled in multiple reporting platforms, including Sitetracker
- ☐ Previously held multiple retail supervisory and training roles for teams of 5 – 30 members

EXPERIENCE

Vertex Development, LLC (Tampa, FL) May 2007 – Present

Program Manager: 10/15 – Present

- ☐ Authored Best Practices Operations Manual to establish efficient company-wide protocols
- ☐ Designed internal project tracking database for concise, up-to-date communications with all stakeholders
- ☐ Led cross-functional teams of 15 – 25 people and created actions plans for maximum quality throughout lifecycle
- ☐ Managed contract negotiations of all ground and tenant lease opportunities
- ☐ Conducted semi-annual audits on leases for terms fulfillment and on deliverables for industry compliance
- ☐ Assisted creation of and routinely updated website content
- ☐ Oversaw small cell deployment project in south Florida for nationwide carrier
- ☐ Directed regular deployment meetings to ensure program and project scope were aligned, schedules were on track, issues were addressed and resolved, and team members were held accountable

Site Development Project Manager: 5/07 – 10/15

- ☐ Performed site acquisition of NSB and BTS telecommunications tower sites
- ☐ Compiled custom comprehensive zoning and permitting due diligence packages
- ☐ Coordinated lease negotiations, title curatives and regulatory compliance (FAA, FCC, WMD, environmental)
- ☐ Researched and drafted responses for suitable government-issued RFP's

United Commercial Telecom, LLC (Tampa, FL) July 2019 – Present Project Manager, Small Cells

- ☐ Created process flows and managed program implementation for small cells
- ☐ Oversaw node placement and regulatory processes
- ☐ Negotiated long-term agreements for small cell development
- ☐ Participated in regular deployment meetings with clients and vendors to ensure projects met target deadlines

Various Retailers (Florida & Illinois) May 2000 – December 2006

Team Lead / Assistant Manager / Customer Service positions

- ☐ Trained approximately 50 people on POS systems, including new managers and customer service associates
- ☐ Supervised departments of up to 25 people
- ☐ Creatively and effectively resolved customer issues
- ☐ Sales floor experience with wine, DIY home improvement, and nutritional supplements

EDUCATION

Bachelor of Science, Marketing – University of South Florida (Tampa, FL)

CERTIFICATIONS & AFFILIATIONS

- ☐ Project Management Institute Project Management Professional (2015) PMP#1880824
- ☐ Florida Real Estate Sales Associate License (2007) #SL3202751
- ☐ State of Florida Notary Public, Commission (2007) #GG325101
- ☐ Women's Wireless Leadership Forum Member (2017)
- ☐ Lawrence A. Martucci Benefit Corp., Board Secretary and Silent Auction Co-Chair (2017-2019)
- ☐ TSA – TWIC Clearance
- ☐ Nia Technique – White Belt (2015)

PUBLIC EXHIBIT F

Applicant submits its financial information to the Tennessee Public Utility Commission

(see attachments at end of this document)

2020 P&L and Balance Sheet

2021 Partial P&L and Balance Sheet

**SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS
PARTICIPATION PLAN
UNITED COMMERCIAL TELECOM, LLC**

Pursuant to T.C.A. § 65-5-112, as amended, UNITED COMMERCIAL TELECOM, LLC ("UCT") 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 intrastate and local exchange services in Tennessee.

I. PURPOSE

The purpose of § 65-5-112, T.C.A. is to provide opportunities for small and minority-owned businesses to provide goods and services to telecommunications service providers. UCT is committed to the goals of § 65-5-112, T.C.A. and to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. UCT will endeavor to provide opportunities for small and minority-owned telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, UCT will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to UCT of such opportunities. Once it begins operations, UCT 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, UCT 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, T.C.A.:

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

UCT'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 UCT's full effort to provide equal opportunities for small and minority owned businesses. The Administrator of the Plan will be:

Mark Schuh, President
UNITED COMMERCIAL TELECOM, LLC
725 Primera Blvd, Suite 120
Lake Mary, FL 32746
Telephone: (407) 221-1027

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with T.C.A. § 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 firms as may be required by the Tennessee Regulatory Authority, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperating 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 T.C.A. § 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 UCT 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

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

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

By: Mark Schuh
Administrator

Dated _____, 2021

EXHIBIT H

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Application of)	
)	
UNITED COMMERCIAL)	
TELECOM, LLC)	Application No. _____
)	
For a Certificate to Provide Access)	
Telecommunication 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 September 21, 2021, UNITED COMMERCIAL TELECOM, LLC filed an Application for a Certificate of Public Convenience and Necessity to Provide Access Telecommunications Services. UNITED COMMERCIAL TELECOM, LLC intends to operate within the entire state of Tennessee.

_____, 2021

Mark Schuh, President

Incumbent Local Exchange Carriers (ILEC s)

ID Company Name

21	Ardmore Telephone Company	237 N. 8th Street		Mayfield	KY	42066-0000
1	BellSouth Telecommunications, LLC	333 Commerce Street	Suite 2106	Nashville	TN	37201-3300
14	CenturyTel of Adamsville	1100 3rd Avenue N.	Apt. 532	Nashville	TN	37208-0000
15	CenturyTel of Claiborne	1100 3rd Avenue N.	Apt. 532	Nashville	TN	37208-0000
17	CenturyTel of Ooltewah-Collegedale	1100 3rd Avenue N.	Apt. 532	Nashville	TN	37208-0000
13	Concord Telephone Exchange, Inc.	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000
16	Crockett Telephone Company	PO Box 24207	Attention Lisa	Jackson	MS	39225-0000
74668	Frontier Communications of Tennessee	300 Bland Street		Bluefield	WV	24701-0000
22	Humphreys County Telephone Company	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000
23	Loretto Telephone Company	P. O. Box 130		Loretto	TN	38469-0000
24	Millington Telephone Company, Inc.	PO Box 17040		Jonesboro	AR	72403-0000
18	Peoples Telephone Company	PO Box 24207	Attention Lisa Wigington	Jackson	MS	39225-0000
12	Tellico Telephone Company	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000
11	Tennessee Telephone Company	10025 Investment Drive	Suite 200	Knoxville	TN	37932-0000
25	United Telephone Company, Inc.	P. O. Box 38		Chapel Hill	TN	37034-0000
3	United Telephone Southeast, LLC	1101 3rd Avenue North	Apt. 532	Nashville	TN	37208-0000
19	West Tennessee Telephone Co.	PO Box 24207	Attention Lisa Wigington	Jackson	MS	39225-0000

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Application of)	
)	
)	
UNITED)	Application No. _____
COMMERCIAL)	
TELECOM, LLC)	
)	
For a Certificate to Provide Access)	
Telecommunication Services)	

DIRECT TESTIMONY OF MARK SCHUH ON

BEHALF OF UNITED COMMERCIAL TELECOM, LLC

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TELEPHONE NUMBER.

A. My name is Mark Schuh. My business address is 725 Primera Blvd, Suite 120, Lake Mary, FL 32746. Telephone: (407) 221-1027.

Q. WHAT IS YOUR POSITION WITH UNITED COMMERCIAL TELECOM, LLC?

A. I am the President of UNITED COMMERCIAL TELECOM, LLC ("UCT").

Q. ARE ALL STATEMENTS IN UCT'S APPLICATION TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE, INFORMATION, AND BELIEF?

Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to describe the services that UCT proposes to offer in Tennessee, and to review issues related to UCT's request for a license to provide such services. My testimony specifically addresses UCT's managerial, technical, and financial competence to provide telecommunications services for which authority is requested, and its compliance with the rules and policies of the Tennessee Regulatory Authority ("TRA").

Q. WHAT AUTHORITY IS UCT SEEKING FROM THE TRA?

A. UCT seeks authority to offer access service throughout the State of Tennessee.

Q. IS UCT LEGALLY AUTHORIZED TO DO BUSINESS IN TENNESSEE?

A. Yes. UCT is a Florida Limited Liability Company and has been authorized to do business in Tennessee. UCT's Florida Certificate of Formation is attached to its Application as Exhibit B and its authority to transact business in the State of Tennessee is attached to its Application as Exhibit C.

Q. PLEASE DESCRIBE YOUR BACKGROUND IN THE TELECOMMUNICATIONS INDUSTRY.

A. I have 20 years' experience in the telecommunications industry including finance, product management, acquisitions, deployments and telecommunications management. Further, the management team at UCT has nearly 50 years of collective experience in the telecommunications industry as demonstrated in **Exhibit E** to UCT's Application.

Q. PLEASE DESCRIBE UCT AND THE TYPES OF SERVICES THAT IT WILL PROVIDE IN TENNESSEE.

A. UCT is a Florida limited liability company organized on November 29, 2016, with its headquarters in Tampa, FL. UCT seeks authority to enter the Tennessee market as a provider of limited facilities-based access service. UCT intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs. UCT will offer leasing of dedicated fiber optic strands to allow schools and libraries to create their own privately-operated fiber optic network. This type of dedicated, purpose-built dark fiber networks are physically separate from other customers and controlled by the end-user. UCT will also provide private lit fiber network other carriers wanting assistance with running their networks and associated equipment.

UCT desires to provide access service using fiber optic cabling that is either leased from other providers, placed within existing rights-of-way and/or conduits that are leased from other providers, or constructed within existing rights-of-way or via pole attachment arrangements. UCT may seek to deploy its own facilities in or on existing structures. It is UCT's understanding that without a license, incumbent local exchange carriers have refused to allow entities to use their conduit or poles. It is therefore necessary for UCT to have a license so that it may obtain interconnection agreements with the incumbent local exchange carriers, pole attachment agreements with local utility companies, and franchise agreements and permitting arrangements with local municipalities in Tennessee.

Q. DOES UCT HAVE ADEQUATE ACCESS TO THE CAPITAL NECESSARY TO PROVIDE SERVICE IN TENNESSEE?

A. Yes, UCT possesses the financial qualifications required of applicants for licenses.

UCT, through its parent company Arms Holding, Inc, has access to the financing necessary to fulfill any obligations it may undertake with respect to the operation and maintenance of the services specified in the Application. **Exhibit F** contains ARMS Holding's 2020 and partial 2021 Balance Sheets and Profit & Loss Statements, which demonstrates that it has adequate capital available to provide the proposed service in Tennessee.

Q. IF AUTHORIZED TO PROVIDE ACCESS TELECOMMUNICATIONS SERVICES, WILL UCT ABIDE BY THE RULES, STATUTES, REGULATIONS, POLICIES, AND ORDERS OF THE COMMISSION, AND THE LAWS OF TENNESSEE, IN ITS PROVISION OF SERVICES, INCLUDING

THOSE FOR DISCONNECTION AND RECONNECTION OF SERVICE?

A. Yes.

Q. DOES UCT PLAN TO OFFER LOCAL EXCHANGE TELECOMMUNICATIONS SERVICES IN AREAS SERVED BY AN INCUMBENT LOCAL EXCHANGE CARRIER WITH FEWER THAN 100,000 TOTAL ACCESS LINES?

A. No.

Q. PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH UCT'S PROPOSED OFFERING OF LOCAL SERVICES IN TENNESSEE.

A. Granting this Application will promote the public interest by increasing competition in the provision of telecommunications access services in Tennessee. By enhancing competition, UCT will bring significant benefits to telecommunications users within Tennessee by providing: (a) lower-priced and better-quality service; (b) innovative telecommunications services; (c) efficient use of existing communications resources; and (d) increased diversification and reliability in the supply of communications services. UCT's proposed intrastate services are designed to meet the telecommunications needs of subscribers and permit customers to realize cost savings in communications services. Accordingly, UCT anticipates that its proposed service will provide its customers with better quality services and will increase consumer choice through innovative, diversified, and reliable service and equipment offerings. UCT will comply with all rules and orders of the Commission. Applicant will promptly provide any other information requested by the Commission.

Q. WILL UCT'S PRICING METHODS BENEFIT THE PUBLIC INTEREST?

A. Yes. UCT will implement competitive pricing plans for its access services.

Q. HAS ANY STATE EVER DENIED OR REVOKED THE CERTIFICATION OF UCT OR ONE OF ITS AFFILIATES?

A. No.

Q. HAS UCT OR ONE OF ITS AFFILIATES EVER BEEN INVESTIGATED OR SANCTIONED BY ANY TELLECOMMUNICATIONS REGULATORY AUTHORITY FOR SERVICE OR BILLING IRREGULARITIES?

A. No.

Q. WHO IS KNOWLEDGEABLE ABOUT UCT'S OPERATIONS AND WILL SERVE AS UCT'S REGULATORY AND CUSTOMER SERVICE CONTACT?

A. I am knowledgeable about its operations and will serve as UCT's regulatory and customer service contact.

Q. PLEASE EXPLAIN IN DETAIL UCT'S PROPOSED PROCEDURES FOR RESPONDING TO INFORMATION REQUESTS FROM THE TRA AND ITS STAFF.

A. All requests should be routed to Joseph Isaacs, our Regulatory Director who will then forward to me if necessary, via email or telephone.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

(signature and notary on following page)

I swear that the foregoing testimony is true and correct to the best of my knowledge.

Mark Schuh

President

UNITED COMMERCIAL TELECOM, LLC

Respectfully submitted this _____ day of _____, 2021.

State of Florida

County of Hillsboro

Subscribed and sworn to me, a Notary Public

(Title of person authorized to administer oath)

In the State and County above named this _____ day of _____, 2021.

(Signature of person authorized to administer oath)

VERIFICATION AND SWORN STATEMENT ON BEHALF OF
UNITED COMMERCIAL TELECOM, LLC

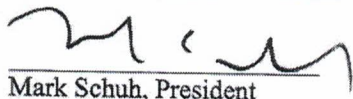
My name is Mark Schuh. I am President of UNITED COMMERCIAL TELECOM, LLC ("UCT" or "Applicant"). My personal knowledge of the facts stated herein has been derived from my employment with Applicant.

I affirm that UNITED COMMERCIAL TELECOM, LLC:

- agrees to comply with all federal and state statutes, rules, and regulations for a Certificate to Provide Access Telecommunications Services, if granted the request as stated in this application.
- certifies that all answers to the attached Application are true and correct; and

I affirm and declare under penalty of perjury under the laws of the State of Florida, that, to the best of my knowledge, all of the statements and representations made in this Application

STATE OF FLORIDA }
 }
COUNTY OF HILLSBOROUGH }



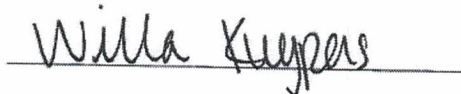
Mark Schuh, President
UNITED COMMERCIAL TELECOM, LLC

Subscribed and sworn to me a Notary Public

(Title of person authorized to administer oath)

In the State and County above named this 13th day of Sept, 2021.

(Signature of person authorized to administer oath)




IV. RECORDS AND COMPLIANCE REPORTS

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

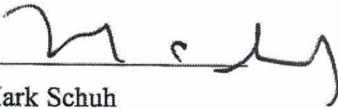
UCT will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, UCT will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

By: Mark Schuh
Administrator



Dated 9/13, 2021

I swear that the foregoing testimony is true and correct to the best of my knowledge.



Mark Schuh

President

UNITED COMMERCIAL TELECOM, LLC

Respectfully submitted this 13th day of September, 2021.

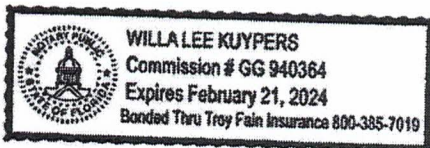
State of Florida

County of Hillsboro

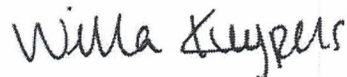
Subscribed and sworn to me, a Notary Public

(Title of person authorized to administer oath)

In the State and County above named this 13th day of Sept, 2021.



(Signature of person authorized to administer oath)



ARMS Holdings, Inc.

Balance Sheet

As of December 31, 2020

	TOTAL
ASSETS	
Current Assets	
Bank Accounts	
ARMS ZBA Analysis (XXXXXX 9770)	152,802.86
Axiom Bank	462.02
United Commercial Real Estate	8,791.17
United Commercial Telecom	301,091.00
VERTEX	-11,635.88
Total Bank Accounts	\$451,511.17
Accounts Receivable	
Accounts Receivable	1,039,784.86
Tower Income Receivable	
Edgewater	97,242.66
Grand Island	0.00
Wekiva	0.00
Total Tower Income Receivable	97,242.66
Total Accounts Receivable	\$1,137,027.52
Other Current Assets	
Due From Alan Ruiz	12,672.04
Due From Mark Schuh	31,541.28
Employee Loans	5,000.00
Loan - UCT	135,472.16
Meals and Entertainment	0.00
Payroll	0.00
Travel Expense	0.00
Total Loan - UCT	135,472.16
Node in Progress	
A&E	0.00
Environmental	0.00
Insurance	0.00
Permit Fees	360.16
Postage	0.00
Total Node in Progress	360.16
Prepaid Expenses	39.40

	TOTAL
Tower in Progress	-163.08
Advertising	4,517.07
Construction	2,514,022.65
Consultation Fees	19,187.65
Drawings	53,402.90
Engineering Fees	109,312.90
Environmental	134,571.44
FAA	942.53
FCC	0.00
Ground Lease	189,727.39
Insurance	10,626.85
Landscaping	0.00
Legal	233,902.95
Maintenance	0.00
Non-Refundable Deposit	6,000.00
Office Supplies	329.51
Option Payment	81,500.00
OTHER	0.00
Permitting	0.00
Photo Simulations	0.00
Postage	5,132.02
Professional Fees	10,000.00
Recording Fee	1,558.00
Site Acquisition Services	19,750.00
Site Security	0.00
Survey	107,450.88
Telephone	0.00
Title Work	550.00
Tower Site Fee	10,000.00
Travel	8,854.51
Utilities	3,026.85
Zoning	148,708.13
Total Tower in Progress	3,672,911.15
Vendor Tower Contributions	-70,000.00
Total Other Current Assets	\$3,787,996.19
Total Current Assets	\$5,376,534.88
Fixed Assets	
Land	
North Cape	27,500.00
Total Land	27,500.00
OFFICE	
Accumulated Depreciation	-12,541.27
Computer	2,379.61
Office Equipment	10,305.40
Office Furniture	1,750.28
Total OFFICE	1,894.02

	TOTAL
TOWERS	
Cypress Elementary	0.00
Cypress Elementary Depreciation	0.00
Total Cypress Elementary	0.00
Island Coast High School	0.00
Island Coast Depreciation	0.00
Total Island Coast High School	0.00
Lake Eloise	422,807.45
Lake Eloise Depreciation	-40,689.70
Total Lake Eloise	382,117.75
Lithia East	0.00
Lithia East Depreciation	0.00
Total Lithia East	0.00
MLK & Valrico Tower	0.00
MLK & Valrico Depreciation	0.00
Total MLK & Valrico Tower	0.00
Navea	340,843.73
Navea Depreciation	-43,976.42
Total Navea	296,867.31
Port Charlotte	320,943.66
Port of Palm Beach Tower	0.00
Port of Palm Beach Depreciation	0.00
Total Port of Palm Beach Tower	0.00
SSC Oviedo	0.00
SSC Oviedo Depreciation	0.00
Total SSC Oviedo	0.00
Weeki Wachee Tower	0.00
Ground Lease	0.00
Weeki Wachee Depreciation	0.00
Total Weeki Wachee Tower	0.00
Wimauma	540,116.00
Wimauma Depreciation	-117,477.95
Total Wimauma	422,638.05
Wiregrass Tower	0.00
Wiregrass Depreciation	0.00
Total Wiregrass Tower	0.00
Total TOWERS	1,422,566.77
Total Fixed Assets	\$1,451,960.79
Other Assets	
Retirement Plan Excess from 2016	6,684.48
Security Deposits	1,200.00
Suspense	0.00
Total Other Assets	\$7,884.48
TOTAL ASSETS	\$6,836,380.15

	TOTAL
LIABILITIES AND EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	371,829.70
Total Accounts Payable	\$371,829.70
Credit Cards	
Capital One	-3,836.80
Total Credit Cards	\$ -3,836.80
Other Current Liabilities	
401-K Payable	
Employee Portion	4,145.00
Employer Portion	17,333.19
Total 401-K Payable	21,478.19
Due to Alan Ruiz	0.00
Due to Barbara Schuh	0.00
Due to Mark Schuh	0.00
Due to Vertical Bridge	
Wiregrass Sale	15,789.25
Total Due to Vertical Bridge	15,789.25
Health Insurance	-13,480.65
Employer Portion	4,326.48
Total Health Insurance	-9,154.17
Health Payable	
Employee Portion	261.39
Total Health Payable	261.39
Payroll Payable	0.00
Payroll Tax Payable	0.00
FED FIT	0.00
FED MEDCARE	0.00
FED SOC SEC	0.00
Total Payroll Tax Payable	0.00
Security Deposit	-1,800.00
Total Other Current Liabilities	\$26,574.66
Total Current Liabilities	\$394,567.56
Long-Term Liabilities	
Axiom Bank PPP Loan	63,668.45
Rent Due to Vertical Bridge	
Buckhead Ridge	8,245.68
Lake Eloise	4,774.05
MLK & Valrico	0.00
Port Charlotte	2,295.00
Port of Palm Beach	0.00
Trapnell	4,418.26
Weeki Wachee	0.00
Wimauma	3,059.64

	TOTAL
Total Rent Due to Vertical Bridge	22,792.63
Valley Loan for FT. Myers WSP	525,627.78
Valley SBA EIDL Loan	152,900.00
Vertical Bridge Pre-Payments	775,458.53
Bexley ES	17,321.96
Blountstown South	174,681.39
CR44A & 439	291,002.45
Ground Rent	12,000.00
Total CR44A & 439	303,002.45
Croom Road	47,140.30
Cypress ES	0.00
Ground Rent	4,820.52
Total Cypress ES	4,820.52
Desoto High	24,635.07
Duplicated Payments	9,265.87
Earleton	40,429.68
Ft. Myers WSP	18,440.87
Harbour Ridge	61,100.16
Harbour Ridge Gilson	100,070.93
Homestead	104,629.23
Ground Rent	20,838.71
Total Homestead	125,467.94
HWY 79 & AJ Steverson	491,669.01
Ground Rent	8,903.23
Total HWY 79 & AJ Steverson	500,572.24
Island Coast HS	0.00
Ground Rent	0.00
Total Island Coast HS	0.00
Lake Eloise	361,003.91
Ground Lease	52,786.15
Total Lake Eloise	413,790.06
Lake Placid Elks	567,920.59
Ground Rent	-246,817.30
Total Lake Placid Elks	321,103.29
Lake Talquin North	13,302.06
Lehigh Acres	48,522.53
Lithia East	0.00
Ground Lease	0.00
Total Lithia East	0.00
Marianna	4,145.92
Mid-Charlotte	48,135.43
MLK & Valrico	0.00
Navea	248,320.71
Ground Rent	82,270.25

	TOTAL
Total Navea	330,590.96
North Cape	22,356.11
Oak Ford	100.94
Pitmann	8,675.26
Port Charlotte	290,517.69
Ground Lease	25,725.00
Total Port Charlotte	316,242.69
Quincy North	14,180.53
Ridgemoor	11,429.32
Salt Springs	74.10
Santa Fe West	172,256.96
SSC Oviedo	15,703.79
Ground Lease	0.00
Total SSC Oviedo	15,703.79
Sweet Loop	45,077.62
Tavernier	5,782.91
US Sugar Farms	6,859.74
Vision Baptist	774,590.15
Ground Lease	-330,000.00
Total Vision Baptist	444,590.15
Watergrass	3,704.82
Weeki Wachee	0.00
Ground Lease	0.00
Total Weeki Wachee	0.00
Westchase N	3,000.00
Westchase S	5,003.85
Whitehurst	179,295.79
Wimauma	446,248.74
Ground Lease	89,479.75
Total Wimauma	535,728.49
Wiregrass	0.00
Ground Lease	0.00
Total Wiregrass	0.00
Total Vertical Bridge Pre-Payments	5,172,061.23
Total Long-Term Liabilities	\$5,937,050.09
Total Liabilities	\$6,331,617.65
Equity	
Common Stock	5,000.00
Partner Contributions - Alan Ruiz	-344,464.42
Partner Contributions - Mark Schuh	-344,464.41
Partner Contributions PROPERTY	847,865.63
Partner Distributions - Alan Ruiz	-2,206,000.00
Partner Distributions - Mark Schuh	-2,204,000.00
Retained Earnings	4,112,689.75

	TOTAL
Net Income	638,135.95
Total Equity	\$504,762.50
TOTAL LIABILITIES AND EQUITY	\$6,836,380.15

ARMS Holdings, Inc.

Profit and Loss

January - December 2020

	TOTAL
Income	
Commission	13,590.76
Gross Receipts	-359.67
Refunds-Allowances	1,567.67
Rental Income	282,498.94
Sales	388,609.99
Services	64,450.00
Site Acquisition Services	448,950.84
Tower Sales Income	1,055,588.89
Vendor Refunds	-1,534.58
Total Income	\$2,253,362.84
Cost of Goods Sold	
Cost of Goods Sold	
Cost of Sold Towers	
Cypress Elementary	305,752.67
Total Cost of Sold Towers	305,752.67
Total Cost of Goods Sold	305,752.67
Total Cost of Goods Sold	\$305,752.67
GROSS PROFIT	\$1,947,610.17
Expenses	
Administrative Expenses	65.75
Application Fee	4,155.92
Bank Charges	1,467.14
Charitable Contributions	500.00
Closing Costs	46,344.39
Dues & Subscriptions	5,931.99
Education	1,724.85
Employee Benefits	
401-K Contributions	10,258.27
Health Insurance	62,225.25
Total Employee Benefits	72,483.52
Entertainment	-4,911.23
Entertainment Meals	11,766.76
Filing Fees	120.00
Insurance	17,174.61
Health	-7,375.08
Liability	3,084.32
Worker's Comp	787.00
Total Insurance	13,670.85

	TOTAL
Interest Expense	27,286.59
Legal & Professional Fees	9,260.71
Accounting Fees	9,825.00
Computer Consultant	3,731.15
Consulting fees	25,000.00
Engineering Services	74,150.00
Legal Fees	4,241.75
Total Legal & Professional Fees	126,208.61
Loan Fees	351.58
Office Expenses	13,875.11
Office Meetings/Meals	132.98
Office Supplies	4,371.51
Office/General Administrative Expenses	1,530.00
Payroll Expenses	91.70
Bonus	2,500.00
Fees	1,733.43
Payroll	306,570.74
Taxes	23,883.56
Total Payroll Expenses	334,779.43
Postage and Delivery	991.64
Rent Expense	
Office Rent	31,813.41
Post Office Box	352.21
Total Rent Expense	32,165.62
Site Acq Services	5,065.52
Subcontractor	579,380.20
Taxes & Licenses	2,197.84
Property Taxes	241.08
Total Taxes & Licenses	2,438.92
Travel	2,230.75
Hotel	7,063.49
Mileage/Gas	2,866.87
Tolls, Taxi & Parking	838.39
Travel Meals	535.03
Total Travel	13,534.53
Utilities	841.50
Telephone & Internet	16,537.49
Total Utilities	17,378.99
Total Expenses	\$1,312,811.17
NET OPERATING INCOME	\$634,799.00
Other Income	
Other Income	3,500.00
Total Other Income	\$3,500.00

	TOTAL
Other Expenses	
Gifts	163.05
Total Other Expenses	\$163.05
NET OTHER INCOME	\$3,336.95
NET INCOME	\$638,135.95

ARMS Holdings, Inc

Balance Sheet
As of March 31, 2021

	TOTAL
ASSETS	
Current Assets	
Bank Accounts	
ARMS ZBA Analysis (XXXXXX 9770)	368,984.28
Axiom Bank	-15,276.77
United Commercial Real Estate	-21,018.34
United Commercial Telecom	138,912.60
VERTEX	-90,316.17
Total Bank Accounts	\$381,285.60
Accounts Receivable	
Accounts Receivable	483,994.11
Tower Income Receivable	
Edgewater	97,242.66
Grand Island	0.00
Wekiva	0.00
Total Tower Income Receivable	97,242.66
Total Accounts Receivable	\$581,236.77
Other Current Assets	
Due From Alan Ruiz	15,172.04
Due From Mark Schuh	34,041.28
Employee Loans	5,000.00
Loan - UCT	135,832.32
Meals and Entertainment	0.00
Payroll	0.00
Travel Expense	0.00
Total Loan - UCT	135,832.32
Node in Progress	
A&E	0.00
Environmental	0.00
Insurance	677.87
Permit Fees	0.00
Postage	0.00

	TOTAL
Total Node in Progress	677.87
Prepaid Expenses	39.40
Tower in Progress	-163.08
Advertising	4,108.82
Construction	2,048,244.75
Consultation Fees	17,937.65
Drawings	52,902.90
Engineering Fees	86,037.90
Environmental	111,131.44
FAA	942.53
FCC	0.00
Ground Lease	370,274.81
Insurance	983.19
Landscaping	0.00
Legal	224,312.82
Maintenance	0.00
Non-Refundable Deposit	6,000.00
Office Supplies	329.51
Option Payment	79,000.00
OTHER	0.00
Permitting	0.00
Photo Simulations	0.00
Postage	4,567.26
Professional Fees	10,000.00
Recording Fee	1,124.00
Site Acquisition Services	19,750.00
Site Security	0.00
Survey	98,180.88
Telephone	0.00
Title Work	550.00
Tower Site Fee	10,000.00
Travel	7,715.92
Utilities	2,087.44
Zoning	131,689.04
Total Tower in Progress	3,287,707.78
Vendor Tower Contributions	-70,000.00
Total Other Current Assets	\$3,408,470.69
Total Current Assets	\$4,370,993.06

	TOTAL
Fixed Assets	
Land	
North Cape	27,500.00
Total Land	27,500.00
OFFICE	
Accumulated Depreciation	-14,435.29
Computer	2,379.61
Office Equipment	10,305.40
Office Furniture	1,750.28
Total OFFICE	0.00
TOWERS	
CR44A & 439	305,338.02
CR44A & 439 Depreciation	-17,811.38
Total CR44A & 439	287,526.64
Cypress Elementary	0.00
Cypress Elementary Depreciation	0.00
Total Cypress Elementary	0.00
Ft. Myers WSP	577,624.27
Ft. Myers WSP Depreciation	-48,135.36
Total Ft. Myers WSP	529,488.91
HWY 79 & AJ Stevenson	499,607.28
HWY 79 & AJ Stevenson Depreciation	-20,816.97
Total HWY 79 & AJ Stevenson	478,790.31
Island Coast High School	0.00
Island Coast Depreciation	0.00
Total Island Coast High School	0.00
Lake Eloise	0.00
Lake Eloise Depreciation	0.00
Total Lake Eloise	0.00
Lake Placid Elks	571,526.26
Lake Placid Elks Depreciation	-57,152.63
Total Lake Placid Elks	514,373.63
Lithia East	0.00
Lithia East Depreciation	0.00

	TOTAL
Total Lithia East	0.00
MLK & Valrico Tower	0.00
MLK & Valrico Depreciation	0.00
Total MLK & Valrico Tower	0.00
Navea	0.00
Navea Depreciation	0.00
Total Navea	0.00
Port Charlotte	0.00
Port Charlotte Depreciation	0.00
Total Port Charlotte	0.00
Port of Palm Beach Tower	0.00
Port of Palm Beach Depreciation	0.00
Total Port of Palm Beach Tower	0.00
SSC Oviedo	0.00
SSC Oviedo Depreciation	0.00
Total SSC Oviedo	0.00
Weeki Wachee Tower	0.00
Ground Lease	0.00
Weeki Wachee Depreciation	0.00
Total Weeki Wachee Tower	0.00
Wimauma	0.00
Wimauma Depreciation	0.00
Total Wimauma	0.00
Wiregrass Tower	0.00
Wiregrass Depreciation	0.00
Total Wiregrass Tower	0.00
Total TOWERS	1,810,179.49
Total Fixed Assets	\$1,837,679.49
Other Assets	
Retirement Plan Excess from 2016	6,684.48
Security Deposits	3,000.00
Suspense	0.00
Total Other Assets	\$9,684.48
TOTAL ASSETS	\$6,218,357.03

	TOTAL
LIABILITIES AND EQUITY	
Liabilities	
Current Liabilities	
Accounts Payable	
Accounts Payable	331,270.70
Total Accounts Payable	\$331,270.70
Credit Cards	
Capital One	-8,419.59
Total Credit Cards	\$ -8,419.59
Other Current Liabilities	
401-K Payable	
Employee Portion	4,801.15
Employer Portion	487.43
Total 401-K Payable	5,288.58
Due to Alan Ruiz	0.00
Due to Barbara Schuh	0.00
Due to Mark Schuh	0.00
Due to Vertical Bridge	
Cypress Elementary Sale	0.00
Wiregrass Sale	15,789.25
Total Due to Vertical Bridge	15,789.25
Health Insurance	0.00
Employer Portion	0.00
Total Health Insurance	0.00
Health Payable	19.18
Employee Portion	37.43
Total Health Payable	56.61
Payroll Payable	0.00
Payroll Tax Payable	0.00
FED FIT	0.00
FED MEDCARE	0.00
FED SOC SEC	0.00
Total Payroll Tax Payable	0.00
Security Deposit	0.00
Total Other Current Liabilities	\$21,134.44
Total Current Liabilities	\$343,985.55

	TOTAL
Long-Term Liabilities	
Axiom Bank PPP Loan	0.00
Rent Due to Vertical Bridge	
Buckhead Ridge	8,245.68
Lake Eloise	19,239.42
Lake Placid Elks	2,754.00
MLK & Valrico	0.00
Port Charlotte	2,295.00
Port of Palm Beach	0.00
Trapnell	4,418.26
Weeki Wachee	0.00
Wimauma	12,238.56
Total Rent Due to Vertical Bridge	49,190.92
Valley Loan for FT. Myers WSP	-4,136.33
Valley SBA EIDL Loan	142,900.00
Vertical Bridge Pre-Payments	44,670.59
Bexley ES	19,391.96
Blountstown South	181,181.39
CR44A & 439	294,907.54
Ground Rent	14,400.00
Total CR44A & 439	309,307.54
Croom Road	47,140.30
Cypress ES	0.00
Ground Rent	0.00
Total Cypress ES	0.00
Desoto High	153,055.89
Ground Rent	2,300.00
Total Desoto High	155,355.89
Duplicated Payments	9,265.87
Earleton	41,529.68
Ft. Myers WSP	577,946.84
Harbour Ridge	61,472.66
Harbour Ridge Gilson	100,070.93
Homestead	333,331.10
Ground Rent	24,838.71
Total Homestead	358,169.81
HWY 79 & AJ Steverson	492,063.84
Ground Rent	10,903.23
Total HWY 79 & AJ Steverson	502,967.07
Island Coast HS	0.00
Ground Rent	0.00
Total Island Coast HS	0.00
Lake Eloise	0.00
Ground Lease	0.00
Total Lake Eloise	0.00
Lake Placid Elks	571,711.50
Ground Rent	3,182.70

	TOTAL
Total Lake Placid Elks	574,894.20
Lake Talquin North	14,852.06
Lehigh Acres	224,248.49
Ground Rent	3,000.00
Total Lehigh Acres	227,248.49
Lithia East	0.00
Ground Lease	0.00
Total Lithia East	0.00
Marianna	4,145.92
Mid-Charlotte	48,135.43
MLK & Valrico	0.00
Navea	0.00
Ground Rent	0.00
Total Navea	0.00
North Cape	90,966.11
Oak Ford	100.94
Pitmann	8,730.91
Port Charlotte	0.00
Ground Lease	0.00
Total Port Charlotte	0.00
Quincy North	15,851.29
Ridgemoor	11,429.32
Salt Springs	74.10
Santa Fe West	442,278.49
Ground Rent	3,000.00
Total Santa Fe West	445,278.49
SSC Oviedo	15,703.79
Ground Lease	0.00
Total SSC Oviedo	15,703.79
Sweet Loop	45,077.62
Tavernier	5,782.91
US Sugar Farms	6,859.74
Vision Baptist	551,780.69
Ground Lease	330,000.00
Total Vision Baptist	881,780.69
Watergrass	3,704.82
Weeki Wachee	0.00
Ground Lease	0.00
Total Weeki Wachee	0.00
Westchase N	3,000.00
Westchase S	5,003.85
Whitehurst	185,795.79
Wimauma	0.00
Ground Lease	0.00
Total Wimauma	0.00
Wiregrass	0.00
Ground Lease	0.00

	TOTAL
Total Wiregrass	0.00
Total Vertical Bridge Pre-Payments	5,002,887.00
Total Long-Term Liabilities	\$5,190,841.59
Total Liabilities	\$5,534,827.14
Equity	
Common Stock	10,000.00
Partner Contributions - Alan Ruiz	-344,464.42
Partner Contributions - Mark Schuh	-344,464.41
Partner Contributions PROPERTY	847,865.63
Partner Distributions - Alan Ruiz	-2,431,000.00
Partner Distributions - Mark Schuh	-2,429,000.00
Retained Earnings	4,927,251.75
Net Income	447,341.34
Total Equity	\$683,529.89
TOTAL LIABILITIES AND EQUITY	\$6,218,357.03

ARMS Holdings, Inc

Profit and Loss

January - March, 2021

	TOTAL
Income	
Commission	0.00
Refunds-Allowances	39.30
Rental Income	42,064.55
Sales	471,438.34
Services	11,516.48
Site Acquisition Services	150,665.42
Tower Sales Income	42,378.19
Total Income	\$718,102.28
GROSS PROFIT	\$718,102.28
Expenses	
Application Fee	694.65
Bank Charges	395.09
Dues & Subscriptions	7,074.48
Employee Benefits	
401-K Contributions	1,733.28
Health Insurance	18,653.31
Total Employee Benefits	20,386.59
Insurance	6,095.71
Health	-8,154.90
Liability	939.87
Total Insurance	-1,119.32
Legal & Professional Fees	3,600.00
Consulting fees	25,000.00
Engineering Services	9,450.00
Total Legal & Professional Fees	38,050.00
Licenses and Permits	32.00
Office Expenses	280.52
Office Meetings/Meals	557.29
Office Supplies	247.48
Office/General Administrative Expenses	100.98
Payroll Expenses	97.65
Bonus	461.75
Fees	445.14
Payroll	84,070.17
Taxes	7,650.69
Total Payroll Expenses	92,725.40
Postage and Delivery	140.52
Rent Expense	
Office Rent	10,719.16
Total Rent Expense	10,719.16

	TOTAL
Site Acq Services	1,800.00
Subcontractor	91,320.00
Survey	255.00
Taxes & Licenses	1,388.96
Travel	222.80
Mileage/Gas	1,312.06
Tolls, Taxi & Parking	72.41
Travel Meals	59.91
Total Travel	1,667.18
Utilities	494.10
Telephone & Internet	3,490.19
Total Utilities	3,984.29
Total Expenses	\$270,700.27
NET OPERATING INCOME	\$447,402.01
Other Expenses	
Gifts	60.67
Total Other Expenses	\$60.67
NET OTHER INCOME	\$ -60.67
NET INCOME	\$447,341.34