

APPLICATION FOR CERTIFICATE
TO PROVIDE OPERATOR SERVICES AND/OR
RESELL
TELECOMMUNICATION SERVICES IN TENNESSEE
SECTION A

24-00027

Application is hereby made for a certificate of authority pursuant to TPUC Rule 1220-4-2-.57 to provide telecommunications services in the State of Tennessee.

Part I: General Information

A. Name of Applicant Impact Telecom, LLC

(Legal Name of different from above) _____

Address 25925 Telegraph Road, Suite 210

City Southfield State MI Zip Code 48033

Tenn. Secretary of State Certificate of Authority ID 001469862

Federal Taxpayer ID Number 14-1931246

Any trade name(s), assumed name(s) or fictitious name(s) used by applicant:

If applicant has affiliate(s) engaged in providing telecommunications services, provide the above requested information for each affiliate(s), as well as for the applicant.

Address _____

City _____ State _____ Zip Code _____

Please see Exhibits A and B.

*****IMPORTANT INFORMATION*****

If applicant has affiliate(s) or parent company, or constituency corporations, engaged in providing telecommunications services, or operating under any trade name, assumed name or fictitious name used by the above, provide the above requested information on all parts of this application as well as for the applicant. Provide this information on a separate attachment, if necessary.

THIS SECTION FOR TN PUC USE

Docket Number _____

Company ID Number _____

Date Approved _____

Evaluator _____

- B. Describe other businesses or business transactions, if any, at the same location as the principal business address:

The Applicant's parent organizations, Lingo Management, LLC* and B. Riley Principal Investments, LLC along with the following affiliates, Lingo Telecom, LLC, Lingo Telecom of Virginia, LLC, Lingo Telecom of the West, LLC, Tempo Telecom, LLC, and Lingo Communications of Kentucky, LLC are located at 25925 Telegraph Road, Suite 210, Southfield, Michigan 48033.

- C. Provide the name, business address and a chronological summary of the employment history and business experience over the preceding eight years of:

- (a) The proprietor, if the applicant is an individual;
- (b) Every member, if the applicant is a partnership;
- (c) Each Executive Officer, Director and each Key Stockholder if the applicant is a joint stock association or a corporation. (Note: If the applicant is a publicly traded corporation or a subsidiary of such a corporation it does not need to provide this information.)
- (d) Any person in a position to exercise control over or direction of, the business of the applicant, regardless of the form of organization of the applicant.

Information to be included:

NAME TITLE

BUSINESS ADDRESS PHONE NO.

EMPLOYMENT HISTORY (with details of duties/responsibilities for each position held)

Provide the above requested information on separate attachments.

Please see Exhibit C.

- D. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust) been associated with a business whose authority to transact business was denied, revoked or suspended by a state or federal regulatory or law enforcement entity?

☐ Yes ☒ No If yes, please explain fully.

- E. Has the Tennessee Public Utility Commission, or any other agency of the State of Tennessee, any federal agency or any agency of any other state ever initiated a regulatory action or order against the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust)?

☐ Yes ☒ No If yes, please explain fully.

- (1) Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust), been enjoined or restrained by order by any court or state or federal regulatory or law enforcement entity from engaging in any conduct or practice related to the telecommunications business?

☐ Yes ☒ No If yes, please explain fully.

- F. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, LLC members, directors, officers, five percent (5%) more shareholders or beneficiaries (of a trust) been associated with a business who has ceased providing telecommunications services in any state?

☐ Yes ☒ No If yes, please explain fully and describe circumstances. (Use additional pages if necessary)

- G. Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, L.L.C. members, directors, officers, five percent (5%) or more shareholders or beneficiaries (of a trust) been convicted of any crime or crimes, or charged in court with any fraudulent or dishonest acts in any transaction of any kind, or confined in any penal institution? If so, list such persons, give details, state results and final outcome. (Use additional pages if necessary)

No.

- (1) Has the applicant or any of its parent companies, subsidiaries, affiliates, owners, partners, L.L.C. members, directors, officers, five percent (5%) or more shareholders or beneficiaries (of a trust) been indicted, convicted, pled guilty or pled nolo contendere to a felony in Tennessee or elsewhere?

☐ Yes ☒ No If yes, please explain fully.

- H. Name and telephone number of contact person to respond to Commission inquiries regarding company operations Monday through Friday.

Name: Alex Valencia, Chief Compliance Officer

Phone Number: 972-910-1900 Fax Number: 866-418-9750

E-Mail Address: Alex.Valencia@lingo.com

- (1) Name and telephone number of contact person authorized to respond to Commission inquiries regarding this filing Monday through Friday.

Name: Carey Roesel, Consultant

Phone Number: 470-672-3934 Fax Number: 407-740-0613

E-Mail Address: croesel@inteserra.com

- I. List a toll-free telephone number and mailing address that consumers can call or write to report service problems and/or request refunds or adjustments.

Phone Number: 866-557-8920 Alternate Phone Number: 972-910-1900

Address 25925 Telegraph Road, Suite 210
City Southfield State MI Zip Code 48033

- J. Provide the name and address of the registered agent for service of process:

Name: Corporation Service Company

Address: 2908 Poston Avenue

City Nashville State TN Zip Code 37203

- K. Identify all authorized agents in the state, if any by name, address, business and home phone numbers and any other businesses conducted by the agent at the same location: (use additional sheets if necessary)

Not Applicable.

Part II

- A. Check the type of telecommunication services you plan to provide in Tennessee.

- ☒ Resell Interexchange long distance services
☐ Operator Services
☐ Resell local services
☐ Other (describe)

- B. If providing operator services, list company name, address and contact person for all reseller carriers you serve in Tennessee. Provide the above information on Appendix I.

Not applicable.

- C. List the state(s) where the applicant, its parent company, and all affiliates is authorized to operate in at this time. For each such state, describe applicant's current activities along with a history of operations there. (Use additional pages if necessary.)

Please see Exhibit D.

For the above states, list the number and types of complaint(s) filed against applicant, and the complaint(s)' current status. Provide this information on a separate attachment, if necessary.

None.

If applicant has affiliate(s) or parent company, or constituency corporations, engaged in providing telecommunications services, or operating under any trade name, assumed name or fictitious name used by the above, provide the above requested information for all as well as for the applicant. Provide this information on a separate attachment, if necessary.

Please see Exhibit D.

- D. List any states that the applicant or any affiliate, parent company, or constituency corporation operating under any trade name, assumed name, or fictitious name, has been denied authority to provide service. (Use additional pages if necessary)

None.

- E. Areas in Tennessee to be served.

The Applicant will be providing service statewide.

- F. What type of customers will the applicant serve?

- a. Business ☒
- b. Residential ☐
- c. Aggregators ☐
(e.g. Hotels, Payphones)
- d. Other (specify) _____

- G. Does the applicant allow a property imposed fee (PIF) to be added to the price of intrastate telephone calls over its network? If yes, specify amount.

No.

- H. Are your prices for intrastate services plus any PIF equal to or less than the dominant carriers' price for similar services? Yes ☒ No ☐

- I. Describe the type of services and price that the applicant will be offering in Tennessee on the Informational Tariff Form found in Appendix II¹.

Please see Exhibit E.

- J. What is the applicant's 10XXX or 800 access code, if applicable?

Not applicable.

- K. Does the applicant now have or plan to have any telecommunication's facilities (e.g. switches, fiber lines) in Tennessee?

No, the Applicant will provide all services via resale agreements.

- L. Whose facility-based network(s) will the applicant be reselling?

Applicant will resell service from AT&T and other carriers as needed.

- M. Will the applicant be utilizing the local telephone company's billing system or billing customers directly²?

Applicant will bill for its services directly on a recurring monthly basis. Customers will have the choice of receiving paper or electronic bills. Bills will separate telecom charges from other non-telecom services and will provide a Customer Service number for service, billing or repair issues. A sample bill is provided in Exhibit F.

- N. Describe briefly how the applicant plans to market their services in Tennessee?

The Applicant will market its services to business and enterprise customers via its website and direct sales channels.

- O. If independent telemarketers are to be used, list the name, contact person, address phone number and federal taxpayer ID for each company.

Not applicable.

¹ Applicant is required to fill out an Informational Tariff form. Failure to fill out this form will cause the applicant's request to be rejected.

² A copy of a bill is required if the applicant is going to bill the customer directly.

- P. Describe the methods and procedures by which the applicant will use to switch a consumer's preferred interexchange service, and to prevent unauthorized switching of a consumer's interexchange service. Use additional pages if necessary. If you have written procedures or company guidelines, attach copies.

Please see Exhibit G.

- Q. Applicant has the ability and agrees to honor the form of call blocking that the consumer has subscribed to with their local telephone company.

Yes ☒ No ☐

- R. Applicant gives permission to the local telephone company to provide the Commission a periodic sample of the reseller's intrastate toll calls. The purpose of this analysis is to audit the reseller's rates to assure they are at or below the dominant carrier's tariffed rates.

Yes ☒ No ☐

- S. Is the Applicant aware of the requirement to insure that any telephone call made between two points in the same county in Tennessee shall be classified as toll-free and not billed to any customer pursuant to Tennessee Code Annotated § 65-21-114?

Yes ☒ No ☐

- T. Is the Applicant aware of the TAR Code data base maintained by BellSouth, its use to insure compliance with T.C.A. § 65-21-114 and the procedures used to enter telephone numbers in that data base?

Yes ☒ No ☐

- U. How does the Applicant intend to comply with T.C.A. § 65-21-114? In your response, please explain technically, what procedures the Applicant will use to insure it will not bill for any county wide calls in Tennessee. Use additional pages if necessary.

The Applicant will rely on underlying carriers to ensure it will not bill for countywide calls.

Part III: Organization Structure

A. Applicant's organizational structure

☐ Corporation

☐ Publicly Traded Corporation

☐ Subsidiary of a Publicly Traded Corporation

☒ Limited Liability Corporation Attach a copy of the articles of organization and operating agreement along with amendments. **Please see Exhibit H.**

☐ Other Form of Corporation – privately held

List type _____ (Example S Corporation)

Attach a copy of the charter, bylaws and/or certificate of incorporation.

☐ Association Attach a copy of the charter, bylaws and/or certificate of incorporation and Letter of Authorization from Tennessee Secretary of State

☐ Joint Stock Association Attach a copy of the charter, bylaws and/or certificate of incorporation. and Letter of Authorization from Tennessee Secretary of State.

☐ Trust Attach a copy of the trust agreement and Letter of Authorization from Tennessee Secretary of State.

☐ Individual Attach a copy of the Letter of Authorization from Tennessee Secretary of State

SECTION (a)-(g) is to be completed if applicant is a Corporation Association or Trust

(a) The date and state of formation/incorporation: _____

(1) Parent Company, if applicable _____

(b) Attach a certificate of good standing from the state in which the applicant was incorporated/formed.

(1) Attach a copy of Certification of Authority issued by Tennessee Secretary of State showing corporation's authority to engage in business in Tennessee.

(d) Describe the corporate structure of the applicant, including the identity of any parent or subsidiary of the applicant. Disclose whether any parent or subsidiary is publicly traded on any stock exchange.

(e) Provide the history of material litigation and criminal convictions of every current of the applicant for the ten-year period prior to the date of this application.

(f) If applicable, attach a copy of the instrument creating the trust and all amendments thereto:

B. ☐ Proprietorship

☐ Partnership

☐ General Attach a copy of the partnership agreement along with any amendments.

☐ Limited Attach a copy of the certificate of limited partnership and the partnership agreement along with any amendments.

☐ Other (Explain on separate sheet)

All of the above will be required to submit a valid business license.

(a) Identify the place and date of the applicant's qualifications to provide telecommunications services in this state.

(b) List the full name, social security number and address of the owners, if a sole proprietorship, or all partners identifying the percentage of ownership:
ATTACH ADDITIONAL PAGES AS NECESSARY

C. Number of employees: Applicant does not have any direct employees but will utilize its parent, Lingo Management, to run operations.

Employee Identification No. (E.I.N.): 14-1931246

Part IV: Financial Information

A. Address where business records are kept:

Address 25925 Telegraph Road, Suite 210

City Southfield State MI Zip Code 48033

B. Attach a copy of the applicant's most recent unconsolidated and consolidated audited financial statements for the immediately preceding three-year period. Provide in detail the applicant's financial condition, including balance sheet and income statement, or a copy of IRS form 1120 or 1065 filed by your business for the previous year. Attach, if available, a copy of your company's 10K and/or stockholder reports.

(1) Fiscal year end: Month _____ Day _____

(2) Date of most recent audited, unconsolidated financial statement of Applicant:

(3) If applicable, name and address of independent certified public accountant:

(4) Period covered by financial statement attached: _____

Please see Exhibit I.

C. Does the applicant currently have an internal auditor and/or internal audit program? **N/A.**

If so, Name of internal auditor _____.

- D. If applicable, provide a history of applicant's material litigation and criminal convictions for the ten-year period prior to the date this application is made. Material litigation is defined as any litigation that, according to generally accepted accounting principles, is deemed significant to a person's financial health and would be required to be referenced in annual audited financial statements, reports to shareholders or similar documents.

None.

Part VI: Rule Compliance Agreement

- A. Attach a copy of a Small and Minority-Owned Telecommunications Business Participation Plan Pursuant to Tennessee Code Annotated § 65-5-212.

Please see Exhibit J.

- B. Have you read and understand the Tennessee Public Utility Commission's (TN PUC) Rules and Regulations for Resellers, 1220-4-2 located at the Commission's website www.tn.gov/tpuc electronic file room in its entirety?

☒ Yes ☐ No

- C. Do you understand the penalties for non-compliance, and all associated fees to provide such service?

☒ Yes ☐ No

Mail the completed application and a check for \$50.00 to: Tennessee Public Utility Commission, 502 Deaderick Street, 4th Floor, Nashville, TN 37243. Should you have any questions, call (615) 770-6886.

The Reseller or Operator Service Provider applicant, hereby, affirms the following:

Will comply with the Tennessee Public Utility Commission's Reseller Rules and all other applicable Commission Rules and state laws, including T.C.A. Section 65-5- 112 located at the T's website <http://www.tn.gov/tpuc> electronic file room under the External Site of Lexis Law Publishing.

Having been duly sworn, and under the penalties of perjury, I hereby certify that the representations in this RESELLER APPLICATION and all attachments and appendices are true and correct to the best of my knowledge and belief. I further understand that omissions or inaccuracies may result in denial of the APPLICATION and grounds for revocation of Certificate of Authority.

For Individual and Partners:

Signature

Signature

PRINTED NAME

PRINTED NAME

Signature

Signature

PRINTED NAME

PRINTED NAME

For Corporations and Other Organizations

Impact Telecom, LLC

(NAME OF CORPORATION)

BY:

SIGNATURE

Alex Valencia

PRINTED NAME

Chief Compliance Officer

(Title)

ATTEST:

(Title)

On this the 26th day of April, 2024 before me, a Notary Public, Alex Valencia known to me to be the person(s) named in, and who executed the foregoing application, being duly sworn according to law, deposes and says that the statements and representations set forth in the above application are true and correct to the best of his/her knowledge and belief.

Notary Public

seal

Respectfully submitted,

Henry Walker

BRADLEY ARANT BOULT CUMMINGS LLP

1221 Broadway, Suite 2400

Nashville, Tennessee 37203

Phone: 615-244-2582

Email: hwalker@bradley.com

*Tennessee law requires that a corporation or limited liability company have legal representation in contested legal matters and it shall not be represented by an officer or other non-lawyer agent in such matters. The reseller application seeks the issuance of a certificate of public convenience and necessity ("CCN"). A docket seeking a CCN is by its nature a contested case as defined by the Uniform Administrative Procedures Act. Therefore, the application must be signed by an attorney, licensed to practice in the state of Tennessee. Legal representation is required throughout the duration of the case. A public hearing is required to consider the application.

IMPACT TELECOM, LLC

Exhibit A

Affiliates

The Applicant's parent organizations are Lingo Management, LLC, and B.Riley Principal Investments, LLC. Lingo Management, LLC is the managing member of the following affiliates:

- Lingo Telecom, LLC
- Lingo Telecom of Virginia, LLC
- Lingo Telecom of the West, LLC
- Tempo Telecom, LLC
- Lingo Communications of Kentucky, LLC

The following affiliates are currently providing telecommunications services in Tennessee:

Lingo Telecom, LLC

Tenn. Secretary of State Certificate of Authority ID: 000250103

Federal Taxpayer ID Number: 75-2332193

Tempo Telecom, LLC

Tenn. Secretary of State Certificate of Authority ID: 000703644

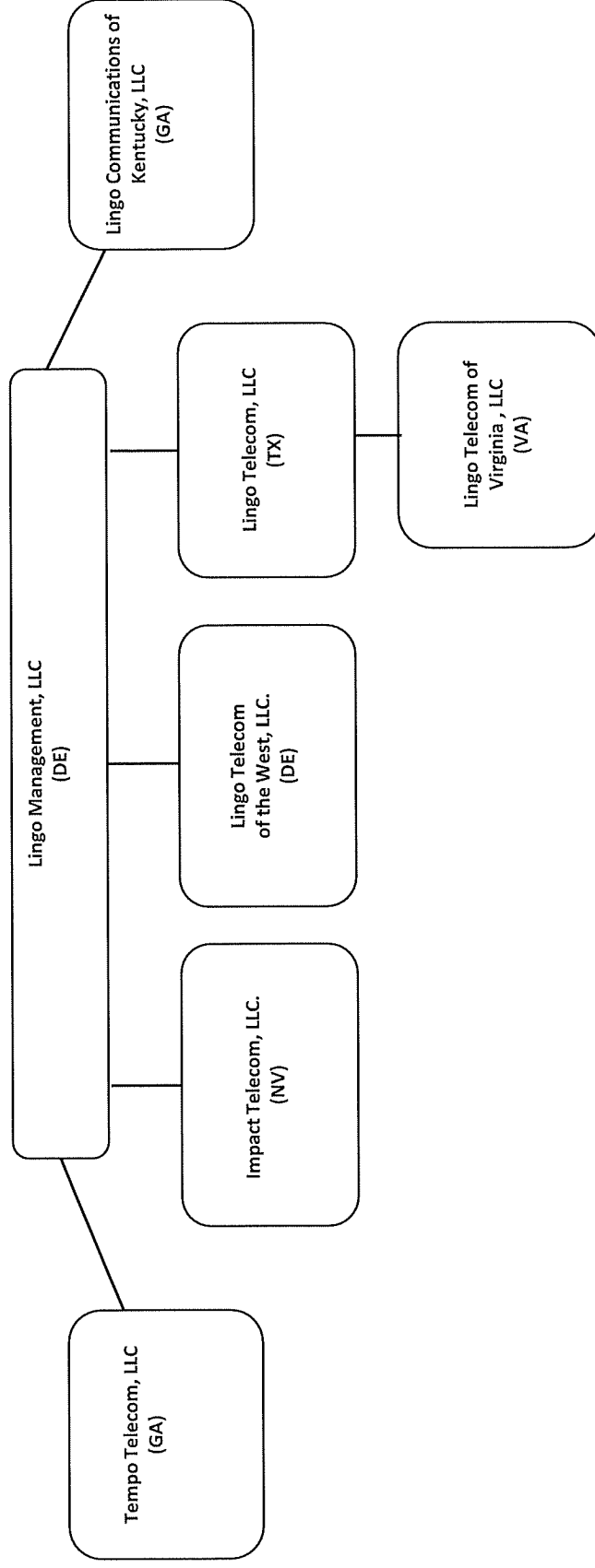
Federal Taxpayer ID Number: 46-1703228

IMPACT TELECOM, LLC

Exhibit B

Organizational Chart

Lingo Management – Organizational Chart



IMPACT TELECOM, LLC

Exhibit C

Company Officers
Bios

Company Officers

Impact Telecom, LLC is owned by Lingo Management, LLC.

Applicant's Officers are:

Ananth Velupillai	Chief Executive Officer
Christine Tarrago	Chief Financial Officer
Vilas Uchil	Chief Operating Officer
Alex Valencia	Chief Compliance Officer
Christopher Ramsey	Chief Revenue Officer

All officers of the Company may be contacted at 25925 Telegraph Road, Suite 210, Southfield, MI 48033 or via telephone at 972-910-1900.

Impact Telecom, LLC Management Resumes

Ananth Veluppillai, Chief Executive Officer

Ananth Veluppillai serves as Chief Executive Officer in addition to being a member of its Board. Ananth also serves as the Chief Operating Officer of B. Riley Principal Investments (an owner of Impact Telecom). Ananth has over 28 years of experience in telecommunications and held various leadership positions, including serving as the COO of Global Operations for Tech Mahindra's Network Services unit and COO of LCC International, Inc., that provided consulting services in Wireless and Wireline telecommunication networks around the world. Ananth holds B.S. in Electrical Engineering from the University of Maryland at College Park.

Christine Tarrago, Chief Financial Officer

Christine Tarrago is the Chief Financial Officer with more than 25 years of global financial executive leadership. Christine Tarrago has also served among others as CFO of private equity backed organizations. Before that, she had leadership positions at Siemens and Alstom. Originally from Europe, she graduated with a BA and MBA from the University of Augsburg, Germany, started her career in Europe where she worked in public accounting on large international publicly listed companies in Germany, France, and Spain. She is fluent in four languages and is a registered CPA in the State of Illinois.

Vilas Uchil, Chief Operating Officer

Vilas Uchil is the Chief Operating Officer. In this capacity, he is responsible for overseeing innovation, technology, and operations. Prior to joining the team, Vilas worked in the telecommunications industry for 20 years. He was the head of engineering and operations at NovoLink Communications, and held positions at SPRINT-NEXTEL Corporation, General Electric Capital GCF (UK), and TATA-Nortel Technology Lab (India). He received a Bachelor of Engineering in electronics and telecommunication engineering from Bombay University (India), and he holds two Master of Science degrees from Missouri University of Science and Technology (electrical engineering/computer engineering).

Alex Valencia, Chief Compliance Officer

Alex Valencia serves as the Chief Compliance Officer and is a 20+ year veteran of the telecom industry. Alex oversees the Company's government and legal affairs, including corporate governance and directs all regulatory policies. He holds an LLM in International and Comparative Law from Notre Dame Law School, a Juris Doctorate from Gonzaga University School of Law, and Bachelor of Arts degrees in Political Science and Latin America Studies from Southern Methodist University.

Impact Telecom, LLC
Management Resumes (Cont'd.)

Christopher Ramsey, Chief Revenue Officer

Chris Ramsey serves as Chief Revenue Officer and is a 20+ year veteran of the communications services industry. He is responsible for managing and driving organic sales, sales operations, and marketing. Chris excels at managing multiple sales channels with an excellent track record of optimizing sales costs and ROI. Previously, Chris served as the SVP of Revenue at PuppySpot, and previously, as Chief Sales and Marketing Officer at Birch Communications. Chris holds a Bachelor of Arts Degree in Religious Education and Psychology from Southwest Baptist University.

Patrick Reilly, VP, Carrier Services

Patrick Reilly serves as VP of Carrier Services and is a 25+ year veteran of the telecom industry. Patrick has extensive senior-level experience managing Carrier sales, engineering and operational roles within the wireless and wireline space spanning domestic and international communications service offerings. Previously he held management and executive-level positions at Frontier Communications, Global Crossing, and ANI Networks.

IMPACT TELECOM, LLC

Exhibit D

Affiliate Operations

Impact Telecom, LLC's affiliates operating outside of Tennessee include the following:

- Lingo Telecom, LLC – local and interexchange authority in all 50 states and the District of Columbia.
- Lingo Telecom of Virginia, LLC - local and interexchange authority in Virginia.
- Lingo Telecom of the West, LLC - local and interexchange authority in Alaska (IXC only), California, Hawaii, and Nevada.
- Tempo Telecom, LLC – wireless ETC authority in all 50 states and the District of Columbia.
- Lingo Communications of Kentucky, LLC - local and interexchange authority in Virginia.

IMPACT TELECOM, LLC

Exhibit E

Informational Tariff Form

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.

IMPACT TELECOM, LLC

Exhibit F
Sample Bill

Invoice

Impact Telecom, LLC.
9330 LBJ Freeway, Suite 944
Dallas, TX 75243

**Services Invoiced To:**

ACCOUNTS PAYABLE
XXXXX - Wholesale
P.O. BOX 12345
Dallas, TX 75243

Account Number	Invoice Number	Invoice Date	Period Starting	Period Ending
xxxxxxxxxx	1197574349	2024-01-01	2023-12-01	2023-12-31

Account Balance Summary

Previous Account Balance	\$18,943.22
Credits and Adjustments	\$0.00
Payments - Posted	\$0.00
Outstanding Account Balance	\$18,943.22

Current Usage, Charges and Surcharges	\$7,025.55
Discounts	\$0.00
Taxes/Fees	\$0.00
Late Fees	\$0.00

Current Account Balance	\$7,025.55
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Total Account Balance Due	\$25,968.77
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Please wire payment to the following bank or detach this portion and send with your payment

Please remit payment to:

By Check:
Impact Telecom
9330 LBJ Freeway, Suite 944
Dallas, TX 75243

By Wire:
ABA/Transit Number xxxxxx
Bank Account # xxxxx
Beneficiary: Impact Telecom

Please contact your account manager for customer support

Services Invoice To:
AACCOUNTS PAYABLE
XXXXX - Wholesale
P.O. BOX 12345
Dallas, TX 75243

Invoice Number:
1197574349
Amount Due:
\$25,968.77

Account Number:
xxxxxxxxxx
Due Date:
Refer to contract terms.

Account Enclosed:

Please forward all disputes to: accountmanagers@impacttelecom.com. For billing inquiries please contact your account manager.

Fees:	Description	Amount
	Total:	\$0.00
Credits:	Description	Amount
	Total:	\$0.00
Adjustments:	Description	Amount
	Total:	\$0.00
Payments:	Description	Amount
	Total:	\$0.00
Taxes:	Description	Amount
	Total:	\$0.00

Usage Summary**1+ Usage****International**

Date Range	# Calls	Duration in Minutes	Amount
Sub Total:	0	0.0000	\$0.0000
Total:	0	0.0000	\$0.0000

NANP

Date Range	# Calls	Duration in Minutes	Amount
Inter State			
2023-12-01 - 2023-12-31	2,573,702	1,884,062.6000	\$2,753.2259
Sub Total:	2,573,702	1,884,062.6000	\$2,753.2259
Intra State			
2023-12-01 - 2023-12-31	4,732,693	2,632,929.9000	\$4,272.3201
Sub Total:	4,732,693	2,632,929.9000	\$4,272.3201
Total:	7,306,395	4,516,992.5000	\$7,025.5460

Extended NANP

Date Range	# Calls	Duration in Minutes	Amount
Sub Total:	0	0.0000	\$0.0000
Total:	0	0.0000	\$0.0000

Total Usage:	7,306,395	4,516,992.5000	\$7,025.5460
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> **HOW TO PAY YOUR BILL**

- **ONLINE:** You can pay your bill online at my.impacttelecom.com. Log into the customer portal using your 10-digit phone number and password. If you do not yet have an Lingo My Account password, you can use your account number as shown on this bill.
- **BY MAIL:** Please detach the payment stub and return with your payment in the enclosed envelope. Make the check payable to **Impact Telecom**. Please write your account number on your check or money order. Do not send cash. Please note that any payments made by check are converted to an electronic funds transfer and by making any payment via check, you agree to the conversion. If mailing a payment without the enclosed envelope, please remit to: **Impact Telecom, PO Box 660343, Dallas, TX 75266**
- **BY PHONE/CREDIT CARD:** You can make your payment by Credit Card over the phone by calling Impact Customer Service at 1-855-678-1901. Impact accepts VISA, MasterCard, Discover, and American Express. Credit card will be drafted 5 days after date of invoice.

> **WHEN TO PAY YOUR BILL**

Payment is due upon receipt of your invoice. To avoid a late payment charge, payment must be received by the Payment Due Date printed on your bill. A late payment charge of 1.5% plus \$1.50 will be applied to the total unpaid balance that remains after the Payment Due Date.

> **QUESTIONS ABOUT YOUR BILL**

For information about a transaction on your bill, please call Customer Service at the number printed on the front of the bill. All requests for investigation must be received within 30 days of the date of the bill on which the problem occurs. Calls to international cellular or audiotext phone numbers will be billed at a higher rate. Most calls are billed to a customer on the following invoice, but occasionally some charges may appear on a later invoice.

> **RETURNED ITEMS**

A fee of \$25.00 will be applied to returned checks.

> **SERVICE RESTORATION FEE**

This fee recovers Impact's cost to reinstate an account that has been suspended or canceled for non-payment. The fee shall be \$14.99 per account reactivated plus the total unpaid balance.

> **WHAT IS THE UNIVERSAL SERVICE FUND (USF) FEE?**

The Universal Service Fund (USF) helps provide affordable telecommunications services for low-income customers and customers in rural areas. It also provides discounts on Internet access for eligible schools, libraries and rural health care providers. The USF Fee is collected from telecommunications carriers and administered by the Universal Service Administration Corporation (USAC). They are responsible for disbursing the funds according to eligibility criteria established by the FCC.

> **WHAT IS THE CARRIER COST RECOVERY FEE?**

Impact charges a CCRF per telephone number per billing cycle. This fee represents compensation for administrative, compliance, and other services that Impact performs and expenses paid to underlying vendors that Impact incurs in the provision of the Service. What is included in the CCRF is subject to change from time to time.

> **9-1-1 FEE**

A fee used to fund the 9-1-1 telephone network that allows callers to reach a public safety agency when they dial the digits "9-1-1". The amount of fees varies by region and state and is set by state and municipal authorities.

> **TAXES, GOVERNMENTAL SURCHARGES AND FEES**

Includes sales, excise and other taxes and governmental surcharges and fees that are required by law to bill customers. These taxes, surcharges and fees may change from time to time without notice.

> **YOUR RIGHTS AS A CUSTOMER**

Placing charges on your phone bill for products and services without your authorization is known as "cramming". Switching your long distance service without your permission is known as "slamming". State and Federal law prohibit both of these activities. If you believe you were crammed or slammed you should contact the telephone company that bill you for your telephone service and request that it takes correct action. If the company fails to resolve your request or if you would like to file a complaint, you may write or call the Public Utility Commission.

> **PRIVACY POLICY OPT-OUT AND INFORMATION**

You may opt out of receiving marketing-related emails or text messages from Lingo by contacting our Customer Service department at 1-888-606-8394. Please refer to our Privacy Policy at www.Lingo.com for additional information.

Note: Occasionally long distance usage charges may appear on your invoice with a call date that is beyond 30 days due to system errors or other factors beyond our control.

Save time with my.impacttelecom.com – Manage features, make payments, and view call details at my.impacttelecom.com.

- **CALLOCAL SERVICE INFO** This bill is now due and payable; it becomes subject to a late payment charge if not paid within 15 calendar days of the presentation date (postmark date). Should you question this bill, please request an explanation from Lingo. If you believe you have been billed incorrectly you may file a complaint with the California Public Utilities Commission, Consumer Services Division (CSD), 505 Van Ness Avenue, San Francisco, CA 94102, or 107 South Broadway, Room 5109, Los Angeles, CA 90012. To avoid having service disconnected, payment of the disputed bill should be made "under protest" to the CPUC or payment arrangements should be made agreeable to Lingo pending the outcome of the Commission's Consumer Services Division review. The CSD shall review the basis of the billed amount, communicate the results of the review to the parties and inform you of your recourse to pursue the matter further with the Commission.

CA Federal Subscriber Line Charge

These charges are imposed by action of the Federal Communications Commission. The FCC may be contacted at 445 12th Street, SW, Washington, D.C. 20554 or at 1-888-225-5322.

UNIVERSAL SERVICE FUND Charges are imposed by action of the Federal Communications Commission.

The Commission does not prohibit competitive carriers from using discretion in establishing the rate or this charge.

LOCAL NUMBER PORTABILITY Charges are imposed by action of the Federal Communications Commission.

The Commission does not prohibit competitive carriers from using discretion in establishing the rate or this charge.

- **CT** Either initially or upon dissatisfaction with our resolution of your complaint, you may notify the Department of Public Utility Control, Consumer Assistance, 10 Franklin Square, New Britain, CT 06051. The Department may also be reached toll-free within Connecticut at 1-800-382-4586 or (860) 827-2622 from out of state.

• **MARIGHT TO DISPUTE YOUR BILL**

If for any reason you believe your bill is wrong, you may call or write and Lingo representative and explain the amount you believe to be in error and the reason you believe there has been an error.

If, when you receive the decision of the Lingo representative, you still consider the bill wrong or are not satisfied, you have the right to appeal to the Massachusetts Department of Telecommunications and Cable by calling or writing to the Department to request a hearing.

Call or write: **CONSUMER DIVISION DEPARTMENT OF TELECOMMUNICATIONS AND CABLE** Two South Station Boston, MA 02110 Telephone 617-305-3531 or 1-800-392-6066.

Your telephone service will not be shut off for failure to pay the portion of your bill which you are disputing. If you need more time to pay, call Lingo at the business office number shown on the front of the bill.

• **DC** Dispute Information

District of Columbia Customer Notice - The Public Service Commission regulates Lingo. Please contact Lingo at the Customer Service toll-free number on your bill with any disputes. If you have an unresolved dispute, you may contact either the Public Service Commission at 1333 H Street, N.W., 2nd Floor, West Tower, Washington, D.C. 20005, telephone number (202) 626-5100, or the Office of People's Counsel, 1133 15th Street, N.W., Suite 500, Washington, D.C. 20005, telephone number (202) 727-3071.

- **NC** You are a subscriber to a bundled local telephone service. Please note that if you do not pay your entire bill for bundled local service, all components of the bundled local service are subject to disconnection. You do not have the right to retain selected components of the bundled local service by paying for only those components.

- **NY** Do you have a complaint regarding your telecommunications service that we haven't been able to resolve? New York State Department of Public Service (DPS) may be able to assist you: www.dps.ny.gov complaints or by calling the DPS HELPLINE (800) 342-3377.

- **OH** Ohio Customer Complaints - Customers may contact Lingo Customer Service with the service questions and/or complaints at the telephone number listed in this bill. If your complaint is not resolved after you have called Lingo, or for general utility information, residential and business customers may contact the Public Utilities Commission of Ohio for assistance at 1-800-686-7826 (toll-free) or for TTY at 1-800-686-1570 (toll-free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.puco.ohio.gov.

- **OH** Residential customers may also contact the Ohio Consumers Counsel for assistance with complaints and utility issues at 1-877-742-5622 (toll free) from 8:00 a.m. to 5:00 p.m. weekdays, or at www.pickccc.org.

- **PA** Non-payment of any past due local basic service charges could result in suspension of your local basic service after you receive a separate written notice.

- **WV** Impacts a utility regulated by the Public Service Commission of West Virginia.

**CUSTOMER PROPRIETARY
NETWORK INFORMATION (CPNI)
NOTICE**

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have the right, and we have the duty, under federal law, to protect the confidentiality of your CPNI. We may share your CPNI among our affiliates to market communications-related products and service to you. CPNI will not be shared with unrelated third parties for their own use. You may choose not to have your CPNI shared for the marketing purposes described above by notifying us by phone, online or through Customer Service. Unless you notify us in one of these ways, we may share your CPNI with authorized companies as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about sharing your CPNI will not affect the provision of any services you currently have with us. Note: This CPNI notice doesn't apply to the residents of the state of Arizona.

IMPACT TELECOM, LLC

Exhibit G

Slamming Policy

Not Applicable. Applicant plans to provide resold interexchange telecommunications service to wholesale customers.

IMPACT TELECOM, LLC

Exhibit H

Articles of Organization

License to Transact Business in Tennessee



BARBARA K. CEGAVSKE
Secretary of State
202 North Carson Street
Carson City, Nevada 89701-4201
(775) 684-5708
Website: www.nvsos.gov



140304

Articles of Conversion

(PURSUANT TO NRS 92A.205)

Page 1

USE BLACK INK ONLY - DO NOT HIGHLIGHT

ABOVE SPACE IS FOR OFFICE USE ONLY

PLEASE NOTE: The charter document for the resulting entity *must* be submitted/filed simultaneously with the articles of conversion.

Articles of Conversion (Pursuant to NRS 92A.205)

1. Name and jurisdiction of organization of constituent entity and resulting entity:

Impact Telecom, Inc.

Name of constituent entity

Nevada

Jurisdiction

Corporation

Entity type *

and,

Impact Telecom, LLC

Name of resulting entity

Nevada

Jurisdiction

Limited Liability Company

Entity type *

2. A plan of conversion has been adopted by the constituent entity in compliance with the law of the jurisdiction governing the constituent entity.

3. Location of plan of conversion: (check one)



The entire plan of conversion is attached to these articles.



The complete executed plan of conversion is on file at the registered office or principal place of business of the resulting entity.



The complete executed plan of conversion for the resulting domestic limited *partnership* is on file at the records office required by NRS 88.330.

* corporation, limited partnership, limited-liability limited partnership, limited-liability company or business trust .

This form must be accompanied by appropriate fees.

Nevada Secretary of State 92A Conversion Page 1
Revised: 1-5-15



BARBARA K. CEGAVSKE
Secretary of State
202 North Carson Street
Carson City, Nevada 89701-4201
(775) 684-5708
Website: www.nvsos.gov

Articles of Conversion

(PURSUANT TO NRS 92A.205)

Page 2

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ABOVE SPACE IS FOR OFFICE USE ONLY

4. Forwarding address where copies of process may be sent by the Secretary of State of Nevada (if a foreign entity is the resulting entity in the conversion):

Attn:

c/o:

5. Effective date and time of filing: (optional) (must not be later than 90 days after the certificate is filed)

Date: Time:

6. Signatures - must be signed by:

1. If constituent entity is a Nevada entity: an officer of each Nevada corporation; all general partners of each Nevada limited partnership or limited-liability limited partnership; a manager of each Nevada limited-liability company with managers or one member if there are no managers; a trustee of each Nevada business trust; a managing partner of a Nevada limited-liability partnership (a.k.a. general partnership governed by NRS chapter 87).

2. If constituent entity is a foreign entity: must be signed by the constituent entity in the manner provided by the law governing it.

Impact Telecom, LLC

Name of *constituent* entity

X

Signature

President & CEO

Title

12/23/15

Date

* Pursuant to NRS 92A.205(4) if the conversion takes effect on a later date specified in the articles of conversion pursuant to NRS 92A.240, the constituent document filed with the Secretary of State pursuant to paragraph (b) subsection 1 must state the name and the jurisdiction of the constituent entity and that the existence of the resulting entity does not begin until the later date. This statement must be included within the resulting entity's articles.

FILING FEE: \$350.00

IMPORTANT: Failure to include any of the above information and submit with the proper fees may cause this filing to be rejected.

This form must be accompanied by appropriate fees.

Nevada Secretary of State 92A Conversion Page 2
Revised: 1-5-15

PLAN OF CONVERSION

December 23, 2015

This plan of conversion is made and entered into by and among Impact Telecom, Inc., a Nevada corporation (the "Company"), and Impact Telecom Holdings, Inc., a Colorado corporation, as the sole stockholder of the Company (the "Stockholder").

1. Conversion. Subject to the terms and conditions of this plan of conversion, at the Effective Time (as defined in Section 2 below), the Company shall be converted into a limited liability company organized pursuant to the laws of the State of Nevada (the "LLC"), with the Company continuing its existence in the organizational form of a limited liability company. Upon such conversion, the name of the LLC shall be Impact Telecom, LLC, a Nevada limited liability company.

2. Effective Time. The conversion shall become effective upon the filing of articles of conversion and articles of organization with the Secretary of State of the State of Nevada (the "Effective Time").

3. Conversion of Shares. The Stockholder is the sole stockholder of the Company. All of the issued and outstanding capital stock of the Company will be converted into a 100% membership interest in the LLC.

4. Approval. The board of directors of the Company and the Stockholder have unanimously approved this plan of conversion and the conversion of the Company from a corporation to a limited liability company.

5. Managers. The directors of the Company holding office immediately prior to the Effective Time shall, without the requirement of any other action by any person, serve as the managers of the LLC until their successors are duly elected or their prior resignation, removal or death.

6. Officers. The officers of the Company holding office immediately prior to the Effective Time shall, without the requirement of any other action by the members or managers of the LLC, serve as the officers of the LLC until their successors are duly appointed or their prior resignation, removal or death.

7. Governing Documents. The bylaws of the Company shall have no further force or control after the Effective Time, and shall immediately be replaced without the necessity of any further action by an operating agreement executed by the Stockholder, as sole member of the LLC.

8. Continuation of Business. At the Effective Time, the conversion shall have the effect provided for herein and in Section 92A.250 of the Nevada Revised Statutes. Without limiting the generality of the foregoing, from and after the Effective Time, the business of the Company shall continue to be carried on by the LLC and all the rights and property of the

Company shall be vested in the LLC and all debts, liabilities, and obligations of the Company shall continue as debts, liabilities, and obligations of the LLC in the order and priority such debts, liabilities and obligations are established with the Company immediately prior to the conversion. The Company shall not be required to wind up its affairs, pay its liabilities and distribute its assets. The conversion shall not constitute a dissolution of the Company but shall constitute a continuation of the existence of the Company in the form of a limited liability company.

9. Further Actions. The officers of the Company shall take, and shall authorize its counsel to take, all such further actions as may be required to complete the conversion, including all necessary filings with offices of the Secretary of State of Nevada, including articles of conversion that comply with Section 92A.205 of the Nevada Revised Statutes and articles of organization substantially in the form attached hereto as Exhibit A, and the execution of all documents necessary to transfer or evidence the transfer of the legal rights of the Company to the LLC (including all required filings and notices with state and local authorities).

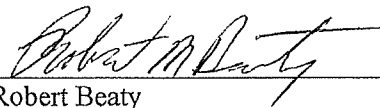
10. Treatment. The Company and the Stockholder agree that, for U.S. federal income tax purposes: (i) the conversion is intended to accomplish the complete liquidation and dissolution of the Company in accordance with Section 332 of the Internal Revenue Code of 1986, as amended (the "Code"), and the regulations thereunder and (ii) this plan of conversion is intended to constitute a plan of liquidation within the meaning of Section 332(b) of the Code.

11. Termination. This plan of conversion may be terminated and abandoned at any time prior to the Effective Time by resolution of the board of directors of the Company if it determines for any reason whatsoever that the conversion contemplated herein is inadvisable.

[SIGNATURE PAGE FOLLOWS]

IN WITNESS WHEREOF, the parties hereto have caused this plan of conversion to be executed as of the date first written above.

IMPACT TELECOM, INC.

By: 
Name: Robert Beaty
Title: President & Chief Executive Officer

IMPACT TELECOM HOLDINGS, INC.

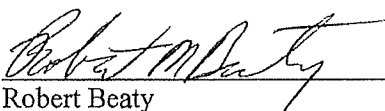
By: 
Name: Robert Beaty
Title: President & Chief Executive Officer

Exhibit A

Articles of Organization

(Attached)



BARBARA K. CEGAUSKE
Secretary of State
202 North Carson Street
Carson City, Nevada 89701-4201
(775) 684-5708
Website: www.nvsos.gov



050106

Articles of Organization Limited-Liability Company

(PURSUANT TO NRS CHAPTER 86)

USE BLACK INK ONLY - DO NOT HIGHLIGHT

ABOVE SPACE IS FOR OFFICE USE ONLY

1. Name of Limited-Liability Company: (must contain approved limited-liability company wording; see Instructions)	Impact Telecom, LLC	Check box if a Series Limited-Liability Company <input type="checkbox"/>	Check box if a Restricted Limited-Liability Company <input type="checkbox"/>
2. Registered Agent for Service of Process: (check only one box)	<input checked="" type="checkbox"/> Commercial Registered Agent: The Corporation Trust Company of Nevada Name <input type="checkbox"/> Noncommercial Registered Agent (name and address below) OR <input type="checkbox"/> Office or Position with Entity (name and address below) Name of Noncommercial Registered Agent OR Name of Title of Office or Other Position with Entity 701 S. Carson Street, Ste. 200 Carson City Nevada 89701 Street Address City Zip Code Mailing Address (if different from street address) City Zip Code		
3. Dissolution Date: (optional)	Latest date upon which the company is to dissolve (if existence is not perpetual):		
4. Management: (required)	Company shall be managed by: <input checked="" type="checkbox"/> Manager(s) OR <input type="checkbox"/> Member(s) (check only one box)		
5. Name and Address of each Manager or Managing Member: (attach additional page if more than 3)	1) Robert Beaty Name 9000 E. Nichols Avenue, Ste. 230 Englewood CO 80112 Street Address City State Zip Code 2) Charles Griffin Name 9000 E. Nichols Avenue, Ste. 230 Englewood CO 80112 Street Address City State Zip Code 3) Name Street Address City State Zip Code		
6. Name, Address and Signature of Organizer: (attach additional page if more than 1 organizer)	I declare, to the best of my knowledge under penalty of perjury, that the information contained herein is correct and acknowledge that pursuant to NRS 239.330, it is a category C felony to knowingly offer any false or forged instrument for filing in the Office of the Secretary of State. Robert Beaty <input checked="" type="checkbox"/> Organizer Signature 9000 E. Nichols Avenue, Ste. 230 Englewood CO 80112 Address City State Zip Code		
7. Certificate of Acceptance of Appointment of Registered Agent:	I hereby accept appointment as Registered Agent for the above named Entity. <input checked="" type="checkbox"/> Authorized Signature of Registered Agent or On Behalf of Registered Agent Entity Date		

This form must be accompanied by appropriate fees.

Nevada Secretary of State NRS 86 LLC Articles
Revised: 10-1-15



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

Impact Telecom, LLC
SUITE 210
25925 TELEGRAPH RD
SOUTHFIELD, MI 48033

September 26, 2023

Filing Acknowledgment

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

SOS Control # :	001469862	Formation Locale:	NEVADA
Filing Type:	Limited Liability Company - Foreign	Date Formed:	05/25/2005
Filing Date:	09/25/2023 3:21 PM	Fiscal Year Close:	12
Status:	Active	Annual Report Due:	04/01/2024
Duration Term:	Perpetual	Image # :	B1452-6617
Managed By:	Member Managed		

Document Receipt

Receipt # : 008381423

Filing Fee: \$300.00

Payment-Check/MO - LINGO TELECOM, LLC, DALLAS, TX

\$300.00

Registered Agent Address:
CORPORATION SERVICE COMPANY
2908 POSTON AVE
NASHVILLE, TN 37203-1312

Principal Address:
SUITE 210
25925 TELEGRAPH RD
SOUTHFIELD, MI 48033

Congratulations on the successful filing of your **Application for Certificate of Authority** for **Impact 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.

Tre Hargett
Secretary of State

Processed By: Jacqueline Krantz



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

INTESERRA INC.
GRACE STANLEY
SUITE 450
151 SOUTHHALL LANE
MAITLAND, FL 32751

April 25, 2024

Request Type: Certificate of Existence/Authorization
Request #: 0580473

Issuance Date: 04/25/2024
Copies Requested: 1

Document Receipt

Receipt #: 008961025 Filing Fee: \$20.00
Payment-Credit Card - State Payment Center - CC #: 3872830882 \$20.00

Regarding:	Impact Telecom, LLC	
Filing Type:	Limited Liability Company - Foreign	Control #: 1469862
Formation/Qualification Date:	09/25/2023	Date Formed: 05/25/2005
Status:	Active	Formation Locale: NEVADA
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

Impact Telecom, 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 #: 067192429

IMPACT TELECOM, LLC

Exhibit I

Financials

The Applicant is providing the consolidated financial statements of its parent, Lingo Management, LLC, which demonstrate that the Applicant has sufficient resources to initiate operations and provide the services for which it seeks authority.

Financial statements are being provided separately with a request for Confidential treatment.

IMPACT TELECOM, LLC

Exhibit J

Small and Minority-Owned Telecommunications Business Participation Plan

IMPACT TELECOM, LLC

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §65-5-112, as amended, Impact Telecom, LLC ("the Company") hereby submits the Company's current small and minority-owned telecommunications business participation plan (the "Plan") to the Tennessee Public Utility Commission ("Commission").

I. PURPOSE

The purpose of §65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to telecommunications service providers. The Company is committed to the goals of §65-5-212 and to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. The Company 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, the Company will make efforts to identify and inform minority-owned and small businesses that are qualified of the opportunity to provide goods and services to the Company. The Company's representatives will contact the Department of Economic and Community Development, the administrator of the small and minority-owned telecommunications assistance program, to obtain a list of qualified vendors. Moreover, the Company will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in §65-5-112.

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

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

III. ADMINISTRATION

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

Alex Valencia
Chief Compliance Officer
Impact Telecom, LLC
25925 Telegraph Road, Suite 210
Southfield, MI 48033
Telephone: 972-910-1900
Facsimile: 866-418-9750
Email: Alex.Valencia@lingo.com

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 cooperating 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.
- (8) Providing information and educational activities to persons within the Company 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 resources such as:

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

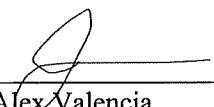
The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small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

IV. RECORDS AND COMPLIANCE REPORTS

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

The Company will submit records and reports required by the Commission concerning the Plan. Moreover, the Company will cooperate fully with any surveys and studies required by the Commission.

Impact Telecom, LLC

By: 
Alex Valencia
Chief Compliance Officer

Dated: April 26, 2024

IMPACT TELECOM, LLC

Exhibit K

IntraLATA Toll Dialing Parity Plan

Not Applicable. Applicant will provide wholesale interexchange services to other carriers. The customers are other carriers which are large business/large organizations. The Applicant does not provide service to end user retail customers.

IMPACT TELECOM, LLC

Exhibit L

Bond

To be provided

IMPACT TELECOM, LLC

Exhibit M

Notice of Application and Certificate of Service

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

Impact Telecom, LLC

Application for Certificate to Provide
Operator Services and/or Resell
Telecommunications Services in Tennessee

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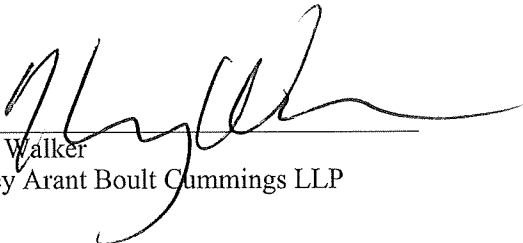
Docket No. _____

NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECS)

PLEASE TAKE NOTICE, that in accordance with the Tenn. Code Ann. § 65-4-201(c) and the Rules of the Tennessee Public Utility Commission for the provision of competitive Intrastate Telecommunications Services, you are hereby given notice that Impact Telecom has filed a Reseller Application for a Certificate of Convenience and Necessity to provide competing interexchange telecommunications in the State of Tennessee

This 29th day of April, 2024.



Henry Walker
Bradley Arant Boult Cummings LLP

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

IMPACT TELECOM, LLC

Exhibit N

Pre-Filed Testimony

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

Impact Telecom, LLC)	
)	Docket No. _____
Application for Certificate to Provide)	
Operator Services and/or Resell)	
Telecommunications Services in Tennessee)	

IMPACT TELECOM, LLC

PREFILED TESTIMONY OF ALEX VALENCIA
CHIEF COMPLIANCE OFFICER

1 **Q. Will you please state your name and business address.**

2 A. My name is Alex Valencia. My business address is 25925 Telegraph Road, Suite 210, Southfield, MI
3 48033.
4

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

6 A. I am Chief Compliance Officer of Impact Telecom, LLC. I am responsible for overall operations of
7 the Company.
8

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

10 A. I am currently the Chief Compliance Officer of Impact Telecom, LLC and have over 20 years of
11 experience in the telecommunications industry. I oversee the Company's government and legal
12 affairs, including corporate governance and direct all regulatory policies. I hold a LLM in
13 International and Comparative Law from Notre Dame Law School, a Juris Doctorate from Gonzaga
14 University School of Law, and Bachelor of Arts degrees in Political Science and Latin America
15 Studies from Southern Methodist University.
16

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to present evidence describing the technical, managerial, and
19 financial fitness of Impact Telecom, LLC to provide resold interexchange telecommunications
20 services in Tennessee. This testimony will also describe the services proposed by the Company.
21 Finally, my testimony will show that the public interest will be served by approval of the application
22 of the Company for a certificate of public convenience and necessity to provide resold service.
23

24 **Q. Has Impact Telecom, LLC registered to do business in Tennessee?**

25 A. Yes. Impact Telecom, LLC has authorization to conduct business in Tennessee.
26

27 **Q. Please explain the Company's corporate structure.**

28 A. Impact Telecom, LLC is a privately held Nevada limited liability company.
29

1 **Q. Please describe the services Impact Telecom, LLC proposes to offer.**

2 A. Impact Telecom, LLC proposes to offer resold interexchange telecommunications services in
3 Tennessee on a wholesale basis to other carriers or large organizations throughout the state of
4 Tennessee.
5

6 **Q. Where in Tennessee does Impact Telecom, LLC intend to offer its local services?**

7 A. Impact Telecom, LLC does not intend to offer local services.
8

9 **Q. How will Impact Telecom, LLC bill for its services?**

10 A. Impact Telecom, LLC will bill for its services directly, on a recurring monthly basis.
11

12 **Q. Describe Impact Telecom, LLC's financial ability to operate as a telecommunications provider.**

13 A. Yes. Impact Telecom, LLC has provided with its application, the consolidated financial statements of
14 its parent, Lingo Management, LLC, which demonstrate that the Applicant has sufficient resources to
15 initiate operations and provide the services for which it seeks authority.
16

17 **Q. Do you believe Impact Telecom, LLC is capable of delivering its proposed services in**
18 **Tennessee?**

19 A. Yes. Impact Telecom has a very experienced management and technical team. Combined with the
20 strong financial backing of our parent company and prompt customer service department, it is my
21 belief that Impact Telecom, LLC is capable of delivering its proposed services in Tennessee.
22
23

1 **Q. How will Tennessee consumers benefit from Impact Telecom, LLC's services?**

2 A. Granting Impact Telecom, LLC's application will introduce a telecommunications service provider
3 committed to providing high quality, innovative, and technologically advanced services that will
4 further increase telecommunications competition within the State of Tennessee. Impact Telecom,
5 LLC's service offerings will increase consumer choice, improve the quality and efficiency in
6 telecommunications services and will likely lead to the reduction of consumer costs, as well as
7 stimulate development of additional services by providing competitive incentives to other providers.
8 Thus, granting Impact Telecom, LLC's application is in the public interest.

9
10 **Q. Does this conclude your testimony?**

11 A. Yes

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

Impact Telecom, LLC

Application for Certificate to Provide
Operator Services and/or Resell
Telecommunications Services in Tennessee

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Docket No. _____

AFFIDAVIT OF

I, Alex Valencia, having been duly sworn, state that if I am called as a witness in this matter, I am competent to testify based on my personal knowledge as follows:

- 1) I am Chief Compliance Officer for Impact Telecom, LLC.
- 2) I am duly authorized by Impact Telecom, LLC to file this affidavit.
- 3) The answers contained in my testimony in this matter, for which I am the sponsor, are true and accurate to the best of my knowledge and belief.

By: _____

Alex Valencia
Chief Compliance Officer
Impact Telecom, LLC

Dated: _____

4/26/2024

Sworn and subscribed before me this 26 day of April, 2024.

My Commission expires: 5-12-2027

Cherie Cooper
Signature of official administering oath

