

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE TENNESSEE

IN RE:)	
)	
SHOW CAUSE PROCEEDING AGAINST)	
S&B TENNESSEE ENTERPRISES INC. FKA)	
MONSTER BROADBAND INC. FOR)	DOCKET NO. 25-00055
VIOLATION OF TENN. CODE ANN. §§ 65-4-)	
301 ET SEQ. FOR FAILING TO FILE AN)	
ANNUAL REPORT AND NONPAYMENT OF)	
INSPECTION FEES)	

RESPONSE OF S&B TENNESSEE ENTERPRISES INC. TO PETITION TO CONVENE A
SHOW CAUSE PROCEEDING

Comes now S&B Tennessee Enterprises Inc., a Tennessee corporation, f/k/a “*Monster Broadband, Inc.*” (“S&B”), by and through counsel, and hereby submits this its Response to Petition to Convene a Show Cause Proceeding. In support of this Response, S&B would respectfully state the following:

1. On November 11, 2022, Point Broadband Fiber Holding, LLC, a Delaware limited liability company (“Point”) acquired all of the assets and operations of S&B pursuant to an Asset Purchase Agreement (and related documents) (the “Purchase Agreement”) that resulted in a transfer of the complete customer base of S&B to Point for operation under Point’s relevant licenses.

2. Effective with the Closing of the Purchase Agreement on November 11, 2022, all of S&B’s customers were transferred to Point effective as of November 11, 2022.

3. S&B simultaneously with the completion of the Closing of the Purchase Agreement, ceased to exist as a telecommunications carrier and is requesting the cancellation of its CCN.

4. S&B has submitted to the Tennessee Public Utility Commission (the “Commission”) a request pursuant to Tenn. Comp. R. & Regs. R. 1220-4-8-.05, that the

Commission cancel its Certificate of Public Convenience and Necessity (“CCN”) as granted in Docket No. 17-00065 on February 2, 2018, at the Commission’s earliest convenience.

5. S&B would state that customer notice is not applicable, as S&B no longer has any customers.

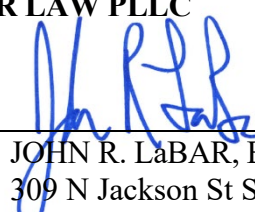
6. S&B respectfully requests that the Commission continue any hearing on the Petition to its September 2025 docket in order to allow the Commission time to process the request for cancellation of S&B set forth above.

7. That upon the processing of the request for cancellation of S&B, that the Commission dismiss the Petition as the CCN issued to S&B will have been voluntarily cancelled.

RESPECTFULLY SUBMITTED this 11th day of August 2025.

LaBAR LAW PLLC

By: _____


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Attorney for the Respondent

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was serve via U.S. Mail or electronic mail upon:

Aaron J. Conklin, Esq., Senior Associate Counsel
Jerry Kettles, Director, Economic Analysis
Connor Robertson, Administrative Services Assistant
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

This the 11th day of August, 2025.

LaBAR LAW PLLC

By: _____

JOHN R. LaBAR