

**Henry Walker**  
Partner  
hwalker@bradley.com  
615.252.2363 direct



September 25, 2025

Hon. David Jones, Chairman  
c/o Ectory Lawless  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Electronically Filed in TPUC Docket Room  
on September 25, 2025 at 4:55 p.m.

**25-00078**

In Re: IPC Systems, Inc. – Resale Application

Dear Mr. Jones,

Please accept for filing the attached, reseller application from IPC Systems, Inc. The application is complete except for a security bond which will be filed shortly. I have also attached a copy of the notice provided to all incumbent, local exchange carriers. The confidential financial statement is included under a separate cover.

Please call or email me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Henry Walker".

Henry Walker (B.P.R. 000272)  
Bradley Arant Boult Cummings LLP  
1221 Broadway, Suite 2400  
Nashville, Tennessee 37203  
(615) 252-2363  
hwalker@bradley.com



PS-0373 Rev 1/09

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

Clear Form

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

Full exact name of person, corporation, partnership, sole proprietorship, or other entity, for which application is made.

Legal name of applicant, if different from above.

Address City State Zip

Tenn. Secretary of State Certificate of Authority ID

Federal Taxpayer ID Number

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  Phone No.

(Use additional pages if necessary)

**\*\*\*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.**

<b>THIS SECTION FOR TN PUC USE</b>	
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:

Please see Attachment 2 for a description of businesses at the same location.

- 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; **Please see Attachment 1.**  
(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.**

- 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 the circumstances. (Use additional pages if necessary)**

**Please see Attachment 2.**

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)

(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 authorized to respond to Commission inquiries regarding company operations Monday through Friday.

Name Phone No. Fax No.

(800)  e-mail Address

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

Name Phone No. Fax No.

(800)  e-mail Address

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 ALTERNATE PHONE NUMBER  
  
ADDRESS CITY ST ZIPCODE

(J) Provide the name and address of the registered agent for service of process:

(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) None.

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 Attachment 2.

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.

Neither Applicant nor its affiliates have been the subject of any complaints.

**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. Not applicable.**

- 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.

Statewide based on subscriber service locations.

- 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. **Not applicable.**

- 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 II<sup>1</sup>. **Please see Attachment 3.**

- 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.

<sup>1</sup>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.

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

Lumen, Crown Castle, Cablevision Lightpath, GTT, Zayo

M. Will the applicant be utilizing the local telephone company's billing system or billing customers directly?<sup>1</sup> **No. Please see Attachment 4.**

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

Applicant markets services through established industry relationships, industry associations, and referrals.

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.**

COMPANY NAME	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE

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.

**Not applicable. Please see Attachment 5.**

Items Q-U below do not apply to Applicant's services. Please see Attachment 5.

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.

<sup>1</sup>A copy of a bill is required if the applicant is going to bill the customer directly.

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.**

Other Form of Corporation

List type C Corporation (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: **August 29, 2985; Delaware**

(1) Parent Company, if applicable **IPC Corp.**

(b) Attach a certificate of good standing from the state in which the applicant was incorporated/formed. **Please see Attachment 6.**

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

**Please see Attachment 7.**

(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.

**Please see Attachment 8.**

(e) Provide the history of material litigation and criminal convictions of every current director, executive officer, or key shareholder of the applicant for the ten-year period prior to the date of this application.

**None. Please see Attachment 10.**

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

**Not applicable.**

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: .

Employer Identification Number (E.I.N.)

Part IV: Financial Information

A. Address where business records are kept:  Financial Plaza

<input type="text" value="Jersey City"/>	<input type="text" value="NJ"/>	<input type="text" value="07302"/>	<input type="text" value="201-253-2000"/>
CITY	STATE	ZIP CODE	PHONE NUMBER

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. **Please see Confidential Attachment 9.**

(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:  
 Please see Attachment 9.

(4) Period covered by financial statement attached:

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

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. Please see Attachment 10.**

Part VI: Rule Compliance Agreement

- A. Attach a copy of a Small and Minority-Owned Telecommunications Business Participation Plan Pursuant to Tennessee Code Annotated § 65-5-112.  
**Please see Attachment 11.**
- 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](http://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, 4<sup>th</sup> 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
<div style="border: 1px solid black; height: 20px; width: 100%;"></div> PRINTED NAME	<div style="border: 1px solid black; height: 20px; width: 100%;"></div> PRINTED NAME
_____ Signature	_____ Signature
<div style="border: 1px solid black; height: 20px; width: 100%;"></div> PRINTED NAME	<div style="border: 1px solid black; height: 20px; width: 100%;"></div> PRINTED NAME

For Corporations  
and Other Organizations

IPC Systems, Inc.

(NAME OF CORPORATION)

BY:

SIGNATURE

Jonathon Hogg

PRINTED NAME

SVP, Chief Risk Officer

Title

ATTEST:

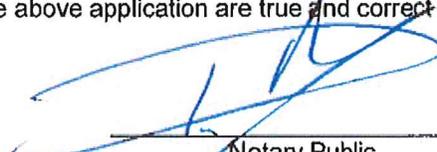
Title

On this the 22<sup>nd</sup> day of May, 2025 before me, a Notary Public

JONATHAN HOGG

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  
PETER EDMUND ADAMS  
seal

Respectfully submitted,

\_\_\_\_\_  
Attorney Licensed to Practice in Tennessee\*

\*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.

## Appendix I

<u>Reseller Name</u>	<u>Address</u>	<u>Contact Person</u>	<u>Phone Number</u>
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Applicant does not provide service to resellers.

**Appendix II  
Informational Tariff Sheet**

<u>Description of Service</u>	<u>Applicant proposed Price change to consumer</u>	<u>Dominant Carriers<sup>3</sup> Price for similar service</u>
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1.	Please see Attachment 3.	
2.		
3.		

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<sup>3</sup>Dominant Carrier (South Central Bell or AT&T, whichever is appropriate). A copy of these companies' rates are found on Appendix V.

## **INTRALATA TOLL DIALING PARITY PLAN**

**As described in Attachment 5, IPC Systems, Inc. will provide only point-to-point, private line services in Tennessee. These private line services do not enable calls to or from the Public Switched Telephone Network. Accordingly, the IntraLATA Toll Dialing Parity Plan requirement is not applicable.**



PS-0373 Rev 1/09

**APPLICATION FOR CERTIFICATE  
TO PROVIDE OPERATOR SERVICES AND/OR  
RESELL  
TELECOMMUNICATIONS SERVICES IN TENNESSEE**

**Listing of Attachments**

The following attachments are provided in response to the requests for information specified in the Commission's Form for an Application for Certificate to Resell Telecommunications Services in the in the State of Tennessee.

- Attachment 1 Officer and Director Employment and Business History
- Attachment 2 Applicant and Subsidiary State Operating Authority
- Attachment 3 Informational Tariff
- Attachment 4 Sample Subscriber Invoice
- Attachment 5 Preferred Interexchange Carrier Change Procedures
- Attachment 6 Delaware Certificate of Incorporation
- Attachment 7 Tennessee Secretary of State Certification of Authority
- Attachment 8 Applicant's Owners and Percentage of Ownership
- Attachment 9 Financial Statements **CONFIDENTIAL Submitted under Seal**
- Attachment 10 Statement Regarding Litigation and Conviction
- Attachment 11 Small and Minority-Owned Telecommunications Business Participation Plan
- Attachment 12 Pre-Filed Testimony Regarding Financial, Managerial, and Technical Capabilities and the Services to be Provided.

## Attachment 1 - Officer and Director Employment and Business History

(Responsive to Application Part I, Item C)

### **Kurt Adams**

#### **Chief Executive Officer; Director**

10 3 Second Street, 15th Floor  
Harborside Financial Center  
Jersey City, NJ 07311  
201-253-2000

Kurt Adams, CEO, leads the organization, setting and executing on strategic vision. Kurt has more than 25 years of leadership experience within the financial and technology industries. Additional information is available at: <https://www.linkedin.com/in/kurt-adams-a9273620b/details/experience/>

### **Adam Bozek**

#### **Vice President and Secretary; Director**

10 3 Second Street, 15th Floor  
Harborside Financial Center  
Jersey City, NJ 07311  
201-253-2000

Adam Bozek, Vice President and Secretary, leads the Legal, Corporate Development, Risk and Compliance teams delivering IPC's strategic objectives and vision. Adam has with over 20 years of experience at leading law firms and as in-house counsel at Fortune 500 and PE-owned technology businesses. Additional information is available at: <https://www.linkedin.com/in/adambozek/>

### **Danielle Berriochoa**

#### **Chief Accounting Officer**

10 3 Second Street, 15th Floor  
Harborside Financial Center  
Jersey City, NJ 07311  
201-253-2000

Danielle Berriochoa, Chief Accounting Officer, leads the Accounting function at IPC, which includes the general ledger and consolidated reporting, order to cash, tax and payroll functional areas. Danielle is a CPA with over 25 years' experience in financial services and software technology companies specializing in the transformation and automation of the accounting function. Additional information is available at: <https://www.linkedin.com/in/danielle-berriochoa-brogan-2843a75/>

## **Attachment 2 · Applicant and Subsidiary State Operating Authority**

(Responsive to Application Part I, Items B & F and Part II, Item C)

Applicant IPC Systems, Inc. ("IPC Systems") and its wholly-owned subsidiary, IPC Network Services, Inc. ("IPC Network Services"), provide specialized technology solutions and associated maintenance to financial institutions and global enterprises. The company's products and services include non-telecom components (e.g., hardware and software), as well as resold point-to-point private line or IP-based point-to-point connectivity, which customers use to access to financial markets. Both entities serve only business customers.

Private line services are currently provided by subsidiary IPC Network Services, which holds authority to operate as a provider of regulated telecommunications services in Tennessee (granted in Docket 07-00190; Company ID 129028). All private line services are provided on a resold basis and do not enable calls to or from the Public Switched Telephone Network.

Applicant IPC Systems historically has provided only non-telecom products and services. To enable provision of all company products and services to customers on an integrated basis (i.e., from one entity under one contract), IPC Systems seeks authority to provide the same resold point-to-point private line services provided by IPC Network Services.

Subsidiary IPC Network Services holds authority to provide regulated telecommunications services in the following states/jurisdictions: AZ, CA, CT, DE, DC, FL, GA, IL, IN, KY, MD, MA, MN, MO, MT, NH, NM, NY, NC, OH, OR, PA, SC, TN, TX, WA, and WI. The company also provides services in certain additional states where its resold private line services are not subject to telecommunications regulations.

Indirect subsidiary Etrali North America, LLC formerly held authority to provide regulated telecommunications services in the following states: CA, CT, IL, MA, and NY. These authorizations were voluntarily surrendered/cancelled after Etrali North America, LLC ceased providing any services under such authorizations.

**Attachment 3 (Application Appendix II) Informational Tariff Sheet**

(Responsive to Application Part II, Item I)

Applicant proposes to provide point-to-point private line services to enterprise customers, primarily in the financial services industry. All services will be provided pursuant to terms of negotiated contracts.

Applicant's private line services are sold as a component of services tailored to financial services customer that include non-telecom offerings. Applicant anticipates that its private line services will be priced at or below corresponding dominant carrier rates for similar services, to the extent that a direct price comparison may be possible.

Applicant submits the attached proposed informational tariff in lieu of an Informational Tariff Sheet.

REGULATIONS AND CHARGES APPLYING TO  
PRIVATE LINE COMMUNICATIONS SERVICES  
IN THE STATE OF TENNESSEE

**IPC SYSTEMS, INC.**

This Tariff contains the rates, terms, and Conditions applicable to the furnishing of specialized private line services provided by IPC Systems, Inc. ("Company") to exclusively to commercial subscribers within the State of Tennessee. This Tariff is on file with the Tennessee Regulatory Authority. Copies may be inspected during normal business hours at Company's principal place of business, 10 3 Second St., 15th Floor, Harborside Financial Plaza, Jersey City, NJ 07302.

## SERVICE AND RATES

### 1.1. Private Line Service

- a. Rate and mileage for private line DS-0, DS-1, DS-3 and higher capacity Service, when available for recurring and non-recurring rate elements, shall be set forth in individual Customer Contracts. The terms of each Customer Contract shall be mutually agreed upon between the Customer and the Company and may contain volume and term commitments, discounts, provisions governing termination of Service prior to expiration of contracts, and other customer-specific terms. The terms of the Customer Contract may be based partially or completely on term and volume commitment, type of arrangement, features, locations, mixture of services, and/or other distinguishing features.
  
- b. In the event of any conflict between the terms of this tariff and the terms of a Customer Contract, the terms of the Customer Contract shall prevail.

**Attachment 4 Sample Subscriber Invoice**

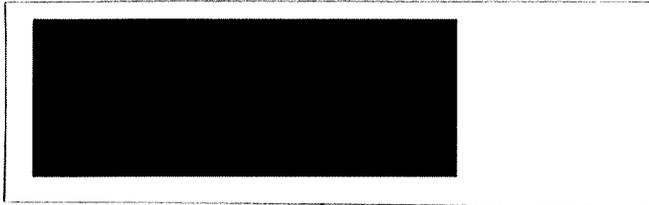
(Responsive to Application Part II, Item M)  
Attached



# INVOICE

1 State Street  
12th Floor  
New York, NY 10004

Invoice Date/Tax Point **March 1, 2025**  
Account Number [REDACTED]  
Legacy Account Number [REDACTED]  
Invoice Number [REDACTED]

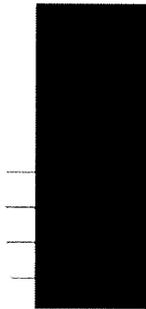


## SUMMARY OF CURRENT MONTH CHARGES

USD

Monthly Recurring Charge  
Administrative Expense Fee (AEF)  
Other Charges & Credits  
Non Recurring Charge  
Prorated MRC

SUBTOTAL  
TOTAL CHARGES BEFORE TAXES  
TOTAL TAXES, FEES AND SURCHARGES  
TOTAL CURRENT MONTH CHARGES **USD**



Please sign into IPC's customer portal (<https://xchange.ipc.com>) for an explanation of all taxes and fees that appear on this invoice.  
\*\*\* The FCC has advised that the USF contribution rate has increase from 35.8% to 36.3% effective January 1st 2025. This new rate will remain in effect through March 31st 2025. \*\*\*

### Payments by Wire/ACH:

Account Name  
Bank  
ABA  
Account Number  
Swift Code



### Payments by Check:

Payable To:-  
IPC Network Services Inc.  
PO Box 35634  
Newark, NJ 07193-5634

### Please send remittance advices to:

ARDepartment@ipc.com

All Payments must be made in full

When making payment, please quote the following reference : [REDACTED]

U.S. EIN#134189405 GST: 86141 3698 QST: 1211282599 BC PST: 1015 2176

Payment Terms are 30 days from Invoice Date

\* Services in Canada are provided by IPC Network Services Canada ULC.

Download your invoices directly from IPC Portal, view, print, export. Log Onto the IPC portal today at [portal.ipc.com](http://portal.ipc.com).

### Please email

Cancellation Requests: [IPCNSCeaseAMER@ipc.com](mailto:IPCNSCeaseAMER@ipc.com)  
Payment Inquiries: [ARDepartment@IPC.com](mailto:ARDepartment@IPC.com)  
Invoices inquiries: [NSBilling@IPC.com](mailto:NSBilling@IPC.com)



# INVOICE



Account Number  
Invoice Number



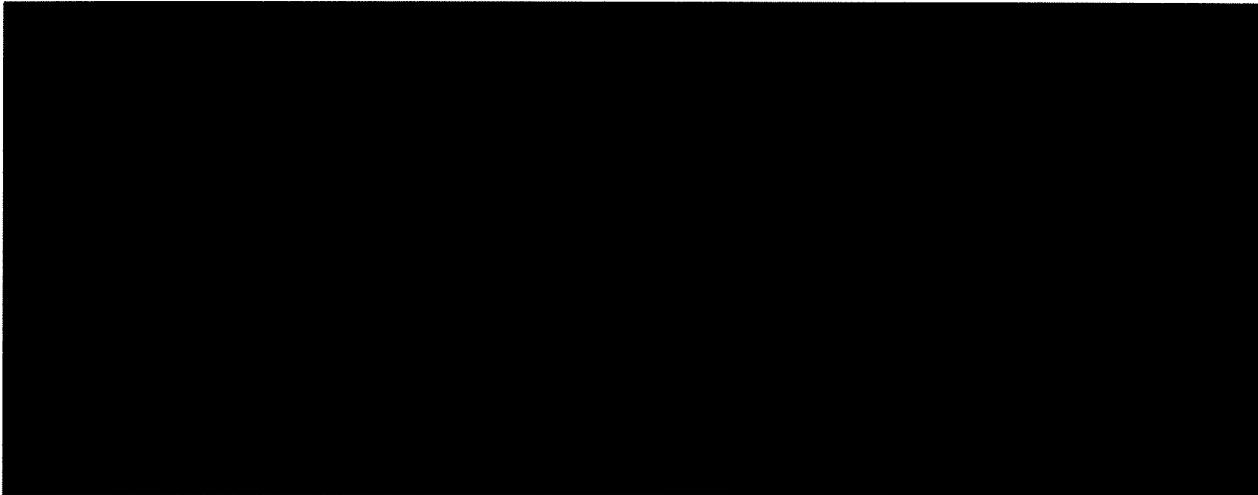
**TAXES, FEES AND SURCHARGES SUMMARY**

**USD**

State and Local Taxes  
Universal Service Fund  
FCC Administrative Charge  
LNP Charge  
Telecommunications Relay Services charge (TRS)  
**Total Taxes, Fees and Surcharges**



Download your tax breakdown directly from the IPC Portal - Log onto [portal.ipc.com](http://portal.ipc.com)





IPC Network Services Circuit Detail

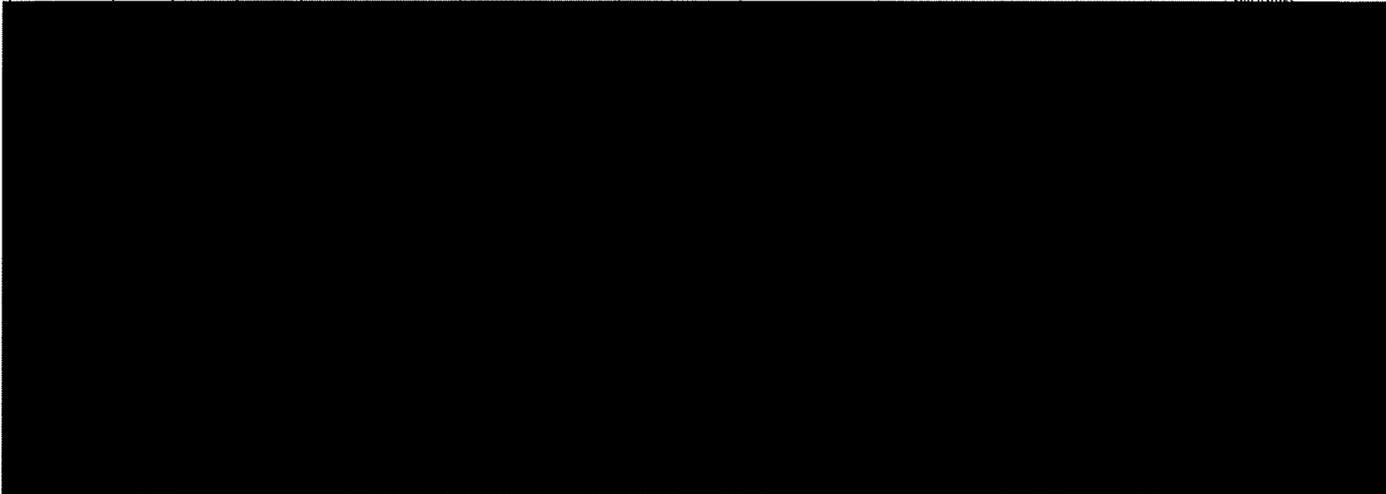
Invoice Number: J454766

March 1, 2025

Account Number: 105INDA0

All figures in USD

Circuit ID	PO #	Cost Center	Additional Info	A-Location	B-Location	Band Width	Period FROM	Period TO	Charge Type	MRC	ALF	OCC	Total Charges	USF	Taxes Fees Surcharges	Grand Total
------------	------	-------------	-----------------	------------	------------	------------	-------------	-----------	-------------	-----	-----	-----	---------------	-----	-----------------------	-------------



## **Attachment 5 Preferred Interexchange Carrier Change Procedures**

(Responsive to Application Part II, Items P & Q-U)

Applicant proposes to provide point-to-point private line services to commercial enterprise subscribers, primarily in the financial services sector. These private line services do not enable calls to or from the Public Switched Telephone Network. Accordingly, Applicant's services operate independently from subscribers' interexchange services provided by other service providers, and therefore Applicant does not propose to provide presubscribed interexchange services. Applicant will not switch, nor be capable of switching, a subscriber's preferred interexchange carrier.

**Attachment 6 Delaware Certificate of Incorporation**

(Responsive to Application Part III, Item A)  
Attached

# Delaware

PAGE 1

*The First State*

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF A DELAWARE LIMITED LIABILITY COMPANY UNDER THE NAME OF "IPC INFORMATION SYSTEMS, LLC" TO A DELAWARE CORPORATION, CHANGING ITS NAME FROM "IPC INFORMATION SYSTEMS, LLC" TO "IPC SYSTEMS, INC.", FILED IN THIS OFFICE ON THE TWENTY-NINTH DAY OF SEPTEMBER, A.D. 2006, AT 2:38 O'CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.



2070119 8100V

060900438

*Harriet Smith Windsor*

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 5081283

DATE: 09-29-06

# Delaware

PAGE 2

*The First State*

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF CERTIFICATE OF INCORPORATION OF "IPC SYSTEMS, INC." FILED IN THIS OFFICE ON THE TWENTY-NINTH DAY OF SEPTEMBER, A.D. 2006, AT 2:38 O'CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.



2070119 8100V

060900438

*Harriet Smith Windsor*

Harriet Smith Windsor, Secretary of State

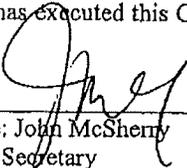
AUTHENTICATION: 5081283

DATE: 09-29-06

STATE OF DELAWARE  
CERTIFICATE OF CONVERSION  
FROM A LIMITED LIABILITY COMPANY TO A  
CORPORATION PURSUANT TO SECTION 265 OF  
THE DELAWARE GENERAL CORPORATION LAW

1. The jurisdiction where the Limited Liability Company first formed is the State of Delaware.
2. The jurisdiction immediately prior to filing this Certificate is the State of Delaware.
3. The name of the Limited Liability Company immediately prior to filing this Certificate is IPC Information Systems, LLC.
4. IPC Information Systems, LLC was originally formed as IPC Merger Corporation on August 29, 1985.
5. IPC Information Systems, Inc. converted to IPC Information Systems, LLC on December 31, 2003.
6. The name of the Corporation as set forth in the Certificate of Incorporation is IPC Systems, Inc.

IN WITNESS WHEREOF, the undersigned being duly authorized to sign on behalf of the converting Limited Liability Company has executed this Certificate on the 29<sup>th</sup> day of September, 2006.

By:   
Name: John McSherry  
Title: Secretary

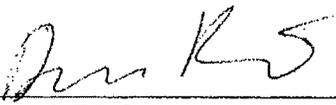
**CERTIFICATE OF INCORPORATION**

**OF**

**IPC SYSTEMS, INC.**

1. The name of the Corporation is IPC Systems, Inc.
2. The address of its registered office in the State of Delaware is Corporation Trust Center, 1209 Orange Street, in the city of Wilmington, County of New Castle. The name of and address of its registered agent is The Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19801.
3. The purpose of the Corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of the State of Delaware.
4. The total number of shares of stock which the Corporation shall have authority to issue is three thousand (3,000) shares with a par value of one (\$0.01) cent per share.
5. The incorporator of the Corporation is Dennis Rimkunas, c/o Roberts & Holland LLP, Worldwide Plaza, 825 Eighth Avenue, 37th Floor, New York, NY 10019-7416.

I, THE UNDERSIGNED, being the incorporator hereinbefore named, for the purpose of forming a corporation pursuant to the General Corporation Law of the State of Delaware, hereby acknowledge that the foregoing Certificate of Incorporation is my act and deed on this 29th day of September, 2006.

  
\_\_\_\_\_  
Dennis Rimkunas  
Sole Incorporator

# Delaware

PAGE 1

*The First State*

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THAT "IPC SYSTEMS, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE NOT HAVING BEEN CANCELLED OR DISSOLVED SO FAR AS THE RECORDS OF THIS OFFICE SHOW AND IS DULY AUTHORIZED TO TRANSACT BUSINESS.

THE FOLLOWING DOCUMENTS HAVE BEEN FILED:

CERTIFICATE OF INCORPORATION, FILED THE TWENTY-NINTH DAY OF AUGUST, A.D. 1985, AT 9 O'CLOCK A.M.

CERTIFICATE OF MERGER, CHANGING ITS NAME FROM "IPC MERGER CORPORATION" TO "IPC COMMUNICATIONS, INC.", FILED THE SIXTH DAY OF JANUARY, A.D. 1986, AT 3 O'CLOCK P.M.

CERTIFICATE OF AMENDMENT, CHANGING ITS NAME FROM "IPC COMMUNICATIONS, INC." TO "CONTEL FINANCIAL SYSTEMS, INC.", FILED THE THIRD DAY OF APRIL, A.D. 1986, AT 9 O'CLOCK A.M.

CERTIFICATE OF AMENDMENT, CHANGING ITS NAME FROM "CONTEL FINANCIAL SYSTEMS, INC." TO "CONTEL IPC, INC.", FILED THE TWENTY-THIRD DAY OF MARCH, A.D. 1989, AT 9 O'CLOCK A.M.

CERTIFICATE OF AMENDMENT, CHANGING ITS NAME FROM "CONTEL IPC, INC." TO "IPC INFORMATION SYSTEMS INC.", FILED THE TWELFTH



*Harriet Smith Windsor*

Harriet Smith Windsor, Secretary of State

2070119 8310

060900438

AUTHENTICATION: 5081284

DATE: 09-29-06

# Delaware

PAGE 2

*The First State*

DAY OF NOVEMBER, A.D. 1991, AT 9 O'CLOCK A.M.

RESTATED CERTIFICATE, CHANGING ITS NAME FROM "IPC INFORMATION SYSTEMS INC." TO "IPC INFORMATION SYSTEMS, INC.", FILED THE TENTH DAY OF MAY, A.D. 1994, AT 11 O'CLOCK A.M.

CERTIFICATE OF CHANGE OF REGISTERED AGENT, FILED THE NINTH DAY OF AUGUST, A.D. 1995, AT 12 O'CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE THIRTIETH DAY OF APRIL, A.D. 1998, AT 12:55 O'CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE TWENTIETH DAY OF MAY, A.D. 1999, AT 4:30 O'CLOCK P.M.

RESTATED CERTIFICATE, FILED THE FIFTEENTH DAY OF JUNE, A.D. 1999, AT 2 O'CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE TWENTY-FIRST DAY OF JUNE, A.D. 1999, AT 12 O'CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE FOURTEENTH DAY OF JUNE, A.D. 2000, AT 5:30 O'CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE FOURTEENTH DAY OF JUNE, A.D. 2000, AT 5:35 O'CLOCK P.M.

CERTIFICATE OF CONVERSION, CHANGING ITS NAME FROM "IPC INFORMATION SYSTEMS, INC." TO "IPC INFORMATION SYSTEMS, LLC",



2070119 8310

060900438

*Harriet Smith Windsor*

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 5081284

DATE: 09-29-06

# Delaware

PAGE 3

*The First State*

FILED THE TWENTY-THIRD DAY OF DECEMBER, A.D. 2003, AT 12:55  
O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF  
THE AFORESAID CERTIFICATE OF CONVERSION IS THE THIRTY-FIRST DAY  
OF DECEMBER, A.D. 2003.

CERTIFICATE OF FORMATION, FILED THE TWENTY-THIRD DAY OF  
DECEMBER, A.D. 2003, AT 12:55 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF  
THE AFORESAID CERTIFICATE OF FORMATION IS THE THIRTY-FIRST DAY  
OF DECEMBER, A.D. 2003.

CERTIFICATE OF CONVERSION, CHANGING ITS NAME FROM "IPC  
INFORMATION SYSTEMS, LLC" TO "IPC SYSTEMS, INC.", FILED THE  
TWENTY-NINTH DAY OF SEPTEMBER, A.D. 2006, AT 2:38 O'CLOCK P.M.

CERTIFICATE OF INCORPORATION, FILED THE TWENTY-NINTH DAY OF  
SEPTEMBER, A.D. 2006, AT 2:38 O'CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID  
CERTIFICATES ARE THE ONLY CERTIFICATES ON RECORD OF THE  
AFORESAID CORPORATION, "IPC SYSTEMS, INC.".



2070119 8310

060900438

*Harriet Smith Windsor*

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 5081284

DATE: 09-29-06

**Attachment 7 Tennessee Secretary of State Certification of Authority**

(Responsive to Application Part III, Item A)  
Attached



Division of Business and Charitable Organizations

Department of State

State of Tennessee

312 Rosa L. Parks Avenue, 6th Floor

Nashville, Tennessee 37243

Phone: 615-741-2286

sos.tn.gov/

Tre Hargett

Secretary of State

KONRAD DALLAND  
1250 CONNECTICUT AVE NW, STE 700  
WASHINGTON, DC 20036, USA

03/11/2025

Request Type: Certificate of Existence/Authorization

Issuance Date: 03/11/2025

Request #: C2025009660

Document Receipt

Order Number: C2025009660

Verification #: 20CAB775

Receipt #: 2025-87942

Filing Fee: \$20.00

Payment: Credit Card - 3893618079

\$20.00

Entity Name: IPC SYSTEMS, INC.  
SOS Control #: 000532138  
Entity Type: Foreign For-profit Corporation  
Status: Active  
Fiscal Year Close: December  
Business County: (No County on Record)  
Obligated Member Entity: No

Initial Filing Date: 10/17/2006  
Formation Locale: DELAWARE  
Duration Term: Perpetual  
Annual Report Due: 04/01/2026

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

**IPC SYSTEMS, INC.**

- \* a Corporation formed in the jurisdiction set forth above, 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

Verification #: 20CAB775

## **Attachment 8 Applicant's Owners and Percentage of Ownership**

(Responsive to Application Part III, Item B)

IPC Systems, Inc. is a privately-held corporation that is 100% wholly-owned by IPC Systems Holdings Corp., a Delaware corporation with principal offices located at 3 10 Second Street, 15<sup>th</sup> Floor, Harborside Financial Center, Jersey City, NJ 07302.

IPC Systems Holdings Corp. is 100% wholly-owned by IPC Corp. a Delaware corporation with principal offices located at 3 10 Second Street, 15<sup>th</sup> Floor, Harborside Financial Center, Jersey City, NJ 07302.

IPC Corp. is 100% wholly-owned by IPC Intermediate Holdings LLC, a Delaware limited liability company with principal offices located at 3 10 Second Street, 15<sup>th</sup> Floor, Harborside Financial Center, Jersey City, NJ 07302.

IPC Intermediate Holdings LLC is 100% wholly-owned by IPC Parent Holdings LLC, a Delaware limited liability company with principal offices located at 3 10 Second Street, 15<sup>th</sup> Floor, Harborside Financial Center, Jersey City, NJ 07302.

IPC Parent Holdings LLC is 60% owned by Hummingbird Circle LLC ("Hummingbird Circle"), a Delaware limited liability company with principal offices at 100 West Putnam Avenue, Greenwich, CT 06830, and 40% owned by Pike Street, LLC ("Pike Street"), a Delaware limited liability company with principal offices at 100 West Putnam Avenue, Greenwich, CT 06830.

Hummingbird Circle and Pike Street are both special purpose acquisition vehicles controlled by certain funds and accounts managed by global investment firm Strategic Value Partners, LLC ("SVP"), a Delaware limited liability company with principal offices at 100 West Putnam Avenue, Greenwich, CT 06830.

**Attachment 9 Financial Statements CONFIDENTIAL**

(Responsive to Application Part IV, Item B)

Applicant considers its financial statements to constitute confidential, Trade Secret information pursuant to the Tennessee Uniform Trade Secrets Act (TUTSA), TN Code § 47-25-1702 (2024). Applicant's most recent consolidated audited financial statements are submitted under seal.

**Attachment 10 Statement Regarding Litigation and Conviction**

(Responsive to Application Part IV: Financial Information, Item D)

Applicant's avers that it has not been engaged in, nor is it currently the subject of, material litigation. Applicant avers further that neither applicant nor its officers have been the subject of criminal convictions for the ten-year period prior to the date this application is made, nor prior.

**Attachment 11 Small and Minority Owned Telecommunications Business Participation Plan**

Attached

**IPC Systems, Inc.**

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

Submitted to:

Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Submitted by:

IPC Systems, Inc.  
Pursuant to TCA § 65-5-212

**SMALL AND MINORITY OWNED TELECOMMUNICATIONS  
BUSINESS PARTICIPATION PLAN OF  
IPC Systems, Inc.**

Pursuant to T.C.A. §65-5-212, as amended, IPC Systems, Inc. ("IPC") submits this small and minority-owned telecommunications business participation plan (the "Plan") to the Tennessee Public Utility Commission ("Commission").

**I. POLICY STATEMENT**

The purpose of §65-5-212 is to provide opportunities for small and minority-owned businesses to provide goods and services to telecommunications service providers. IPC 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. IPC 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, IPC will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to IPC of such opportunities. IPC 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 §65-5-212:

*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/IMPLEMENTATION OF PLAN**

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

Name: Jonathon Hogg  
Title: SVP, Chief Risk Officer  
Address: 10 3 Second St., 15<sup>th</sup> Floor  
Harborside Financial Plaza  
Jersey City, NJ 07302  
Telephone: (201) 253-2000

The Administrator's responsibilities will include:

- (1) Maintaining an updated Plan in full compliance with §65-5-212 and the rules and orders of the Commission.
- (2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.

### **III. ADMINISTRATION/IMPLEMENTATION OF PLAN, Continued**

- (3) Preparing and submitting such forms as may be required by the Commission, including the filing of required annual updates.
- (4) Serving as the primary liaison to and cooperate with the 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 §65-5-212.
- (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 Commission.
- (7) Establishing a record-keeping system to contracts qualified small and minority-owned businesses and efforts to use such businesses.
- (8) Providing information and educational activities to persons within IPC and contracts such persons to seek out, encourage, and promote the use of small and minority owned businesses.

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**

IPC will submit records and reports required by the Commission concerning the Plan. Further, IPC will cooperate fully with any surveys and studies required by the Commission.

**Attachment 12 Pre-Filed Testimony Regarding Financial, Managerial, and Technical Capabilities  
and the Services to be Provided**

Attached

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN THE MATTER OF THE APPLICATION OF )  
IPC SYSTEMS, INC. )  
FOR AUTHORITY TO RESELL ) DOCKET NO. 25- \_\_\_\_\_  
TELECOMMUNICATION SERVICES )  
IN TENNESSEE )

PRE-FILED TESTIMONY OF JONATHON HOGG

ON BEHALF OF

IPC SYSTEMS, INC.

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

A. My name is Jonathon Hogg. My business address is 10 3 Second Street, 15th Floor, Harborside Financial Center, Jersey City, NJ 07302. The Company's main telephone number is 201-253-2000.

**Q. WHAT IS YOUR POSITION WITH THE APPLICANT?**

A. I am Senior Vice President and Chief Risk Officer of IPC Systems, Inc. ("IPC Systems" or "Company").

**Q. WHAT ARE YOUR PRINCIPAL RESPONSIBILITIES?**

A. I am responsible for the Company's strategic planning and execution of our business plan.

**Q. COULD YOU TELL US ABOUT YOUR PROFESSIONAL BACKGROUND?**

A. I am a UK qualified barrister with 25 years' experience both in Court and in-house. I have been working at IPC for 17 years and performed various roles covering commercial contracts, managing IPC's regulatory profile, setting up and running IPC's Corporate Risk function, and helping manage transformation.

**Q. HAVE YOU EVER TESTIFIED BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF TENNESSEE?**

A. No, I have not.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. My testimony supports the Application filed by the Company with the Tennessee Regulatory Authority ("Authority") for authority to provide specialized resold telecommunications network services in Tennessee. My testimony focuses on the Company's technical, managerial and financial qualifications for granting the requested authority.

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

A. Yes. All statements in the Application are true and correct to the best of my knowledge, information and belief.

**Q. PLEASE DESCRIBE THE COMPANY AND ITS OPERATIONS.**

A. IPC Systems, Inc. is a privately-held corporation organized under the laws of the State of Delaware on August 29, 1985. The Company is the direct parent company of IPC Network Services, Inc., which is currently authorized to provide resold telecommunications services in Tennessee.

**Q. HAS ANY STATE COMMISSION DENIED THE COMPANY AUTHORITY TO OPERATE?**

A. No state has refused to grant the Company a certificate to provide telecommunication services.

**Q. PLEASE DESCRIBE THE SERVICES THE COMPANY PROPOSES TO OFFER?**

A. The Company proposes to provide point-to-point private lines services to commercial enterprise customers, primarily in the financial services sector. Subscriber networks will not be interconnected to the public switched telephone network.

**Q. HOW WILL THE COMPANY PROVIDE ITS SERVICES?**

A. The Company will resell point-to-point circuits purchased from underlying carriers.

**Q. WILL THE COMPANY OWN ANY SWITCHING OR TRANSPORT FACILITIES IN TENNESSEE?**

A. No. The Company will not own any switching equipment or transport facilities in Tennessee. As noted, all facilities will be provided on a resold basis.

**Q. HAS THE COMPANY REGISTERED TO DO BUSINESS IN TENNESSEE?**

A. Yes. The Company's Certificate of Authority to transact business as a foreign corporation is attached to the Application at Attachment 7.

**Q. DOES THE COMPANY HAVE THE MANAGERIAL RESOURCES TO PROVIDE BASIC LOCAL EXCHANGE SERVICES TO CUSTOMERS IN THE LISTED LOCAL EXCHANGE AREAS?**

A. Yes. The Company's management team is composed of seasoned industry professionals. Its leadership has experience in banking, communications and telecommunications. The Company's management team understand the challenging technical demands of telecommunications operations and have decades of experience managing telecommunications providers, including the Company's wholly-owned subsidiary IPC Network Services, Inc., which has operated as a certificated provider of telecommunications services in Tennessee since 2007. Summaries of IPC Systems' key officers are included at Application Attachment 1.

**Q. PLEASE DESCRIBE THE COMPANY'S FINANCIAL QUALIFICATIONS.**

A. The Company is financially qualified to provide services in Tennessee. IPC has access to financial resources sufficient to support its planned provision of services in Tennessee. The Company is internally funded. The Company's audited consolidated financial statements are attached at Confidential Attachment 9 to the Application.

**Q. PLEASE DESCRIBE THE COMPANY'S RATE STRUCTURE**

A. The Company's rates are set through individually negotiated contracts with its sophisticated business customers. The Company does not provide services to the general public.

**Q. DOES THE COMPANY HAVE THE TECHNICAL RESOURCES TO PROVIDE THE PROPOSED SERVICES?**

A. Yes. While the Company's technical ability to provide services rests primarily on the technical capabilities of its underlying network providers, the Company has demonstrated through the operations of its subsidiary, IPC Network Services, Inc., that it has the ability to handle any technical issues that arise.

**Q. WILL THE COMPANY COMPLY WITH ALL APPLICABLE REGULATIONS REGARDING THE MANAGEMENT OF 9-1-1 EMERGENCY SERVICE TRAFFIC?**

A. As noted, IPC Systems' private line services do not interconnect with the Public Switched Telephone Network, and thus do not provide access to 9-1-1 services. The Company will nonetheless comply with all regulations to the extent applicable.

**Q. PLEASE DESCRIBE THE COMPANY'S TROUBLE REPORTING PROCEDURES.**

A. Applicant maintains account managers and a customer service team to respond to subscriber inquiries and complaints. Subscribers may contact individually assigned account managers via email or telephone. Customer service team members may also be reached through the company's website or online portal. Applicant's customer service is accessible 24 hours per day, seven days a week, 365 days a year.

**Q. HOW WILL THE COMPANY BILL ITS CUSTOMERS?**

A. The Company will bill customers directly on a monthly or quarterly basis, in accordance with the terms of each customer's negotiated agreement for services.

**Q. HOW ARE BILLING DISPUTES RESOLVED?**

A. Disputes may be raised by customers through the same procedures outlined above for trouble reporting. Billing disputes will be resolved pursuant to each customer's individually negotiated agreement for services. IPC embraces a strong customer service orientation that makes meeting customer needs an absolute priority.

**Q. HOW ARE RATE AND SERVICE INFORMATION REQUESTS PROCESSED?**

A. IPC's assigned account representative(s) is responsible for responding to all subscriber requests for rate and service information.

**Q. HOW ARE OPERATOR-ASSISTED AND DIRECTORY ASSISTANCE CALLS PROCESSED?**

A. As noted, because the Company only provides private line services that do not interconnect with the Public Switched Telephone Network, the Company will not process any directory assistance calls.

**Q. WILL THE COMPANY PROVIDE PUBLIC PAY TELEPHONE SERVICE?**

A. No. The Company will not provide public pay telephone service.

**Q. WILL APPLICANT PROVIDE PREPAID SERVICES?**

A. No. The Company will not provide prepaid services.

**Q. IS GRANT OF THE APPLICANT'S REQUEST FOR AUTHORITY TO PROVIDE SERVICES CONSISTENT WITH THE PUBLIC INTEREST?**

A. Yes. The Company's entry into the Tennessee market will increase competition among providers to the benefit of its subscribers and enhance the utility and security of subscriber networks based on the Company's decades of experience in delivering innovative, in-demand services to enterprise customers in the financial services industry.

**Q. DOES THE COMPANY HAVE A SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN ("PLAN"), AS REQUIRED PURSUANT TO T.C.A. § 54-5-22?**

A. Yes. The Company submitted its Plan as Application Attachment 11.

**Q. HAS THE COMPANY DESIGNATED A PLAN ADMINISTRATOR WHO WILL BE RESPONSIBLE FOR ADMINISTERING THE COMPANY'S PLAN?**

A. Yes. I will be responsible for administering the Plan.

**Q. PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH THE COMPANY'S PROPOSED OFFERING OF TELECOMMUNICATIONS SERVICES IN TENNESSEE.**

**A.** Subscribers will benefit from the Company's wealth of industry experience and innovative service offerings.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

**A.** Yes.

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

IPC Systems, Inc.

Application for Certificate to Resell  
Telecommunications Services in Tennessee

)  
)  
)  
)  
)

Docket No. \_\_\_\_\_

**AFFIDAVIT**

I, Jonathon Hogg, 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 SVP, Chief Risk Officer of IPC Systems, Inc., the Applicant in this matter.
2. I am duly authorized by IPC Systems, Inc. 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: \_\_\_\_\_

Jonathon Hogg  
SVP, Chief Risk Officer  
IPC Systems, Inc.

Dated: 22nd May 2025

Sworn to and subscribed before me this 22 day of May, 2025

\_\_\_\_\_  
Notary Public

PETER EDMUND ADAMS  
Notary Public of London, England  
My commission expires with life



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

IPC Systems, Inc. )  
 )  
Application for Certificate to Resell ) Docket No. \_\_\_\_\_  
Telecommunications Services in Tennessee )  
 )

**AFFIDAVIT**

I, Jonathon Hogg, 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 SVP, Chief Risk Officer of IPC Systems, Inc., the Applicant in this matter.
- 2. I am duly authorized by IPC Systems, Inc. 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:   
\_\_\_\_\_  
Jonathon Hogg  
SVP, Chief Risk Officer  
IPC Systems, Inc.

Dated: 22nd May 2025

Sworn to and subscribed before me this 22 day of May, 2025

  
\_\_\_\_\_  
Notary Public

PETER EDMUND ADAMS  
Notary Public of London, England  
My commission expires with life



Attachment 13 – Notice of Filing and Incumbent, Local Exchange Carriers

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN THE MATTER OF THE APPLICATION )  
OF IPC SYSTEMS, INC. FOR A RESALE )  
CERTIFICATE TO PROVIDE )  
COMPETITIVE TELECOMMUNICATIONS )  
SERVICES )

Docket No. \_\_\_\_\_

NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECS)

PLEASE TAKE NOTICE, that in accordance with the T.C.A. §65-4-201(c), you are hereby given notice that IPC Systems, Inc. has filed an Application for a Certificate of Public Convenience and Necessity to provide competitive telephone service on a resale basis.

This 25<sup>th</sup> day of September, 2025.

Respectfully submitted,



Henry Walker (B.P.R. No. 000272)  
Bradley Arant Boult Cummings LLP  
1221 Broadway, Suite 2400  
Nashville, TN 37203  
Phone: 615-252-2363  
Email: [hwalker@bradley.com](mailto:hwalker@bradley.com)

*Counsel for IPC Systems, Inc.*

### Incumbent Local Exchange Carriers (ILECs)

1. Ardmore Telephone Company, Inc.  
P.O. Box 549  
517 Ardmore Avenue  
Ardmore, TN 38449
2. Bellsouth Telecommunications, Inc.  
333 Commerce Street, Suite 2106  
Nashville, TN 37201-3300
3. Brightspeed of Appalachia, LLC  
P.O. Box 1330  
Fayetteville, NC 28302
4. Brightspeed of East Tennessee, LLC  
P.O. Box 1330  
Fayetteville, NC 28302
5. Brightspeed of Southern Tennessee, LLC  
P.O. Box 1330  
Fayetteville, NC 28302
6. Brightspeed of Western Tennessee, LLC  
P.O. Box 1330  
Fayetteville, NC 28302
7. Crockett Telephone Company  
P.O. Box 24207  
Friendship, TN 38034
8. Frontier Communications of Tennessee  
300 Bland Street  
Bluefield, WV 24701
9. Humphreys County Telephone Company  
10200 Upper Ridge Way  
203 Long Street  
New Johnsonville, TN 37134-0552
10. Loretto Telephone Company, Inc.  
P.O. Box 130  
Loretto, TN 38469
11. Millington Telephone Company, Inc.  
4880 Navy Road  
Millington, TN 38083
12. Peoples Telephone Company  
300 W. Main St.  
Erin, TN 37061
13. Tellico Telephone Company  
P.O. Box 9  
102 Spence Street  
New Johnsonville, TN 37385-0009
14. United Telephone Company  
P.O. Box 38  
120 Taylor Street  
Chapel Hill, TN 37034
15. West Tennessee Telephone Company, Inc.  
P.O. Box 10  
244 E. Main Street  
Bradford, TN 38316