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Electronically Filed in TPUC Docket
Room on January 22, 2026 at 12:56 p.m.

January 22, 2026

Hon. David Jones, Chairman
c/o Tory Lawless
Tennessee Public Utility Commission
502 Deaderick St., 4th Floor
Nashville, Tennessee 37243

Docket No. 26 - 00006

Re: Application of Lumos Fiber of Tennessee, LLC for Certificate of Convenience and Necessity to Provide Competing Local Exchange and Interexchange Telecommunications Services in the State of Tennessee

Dear Chairman Jones,

Enclosed for filing is the application of Lumos Fiber of Tennessee, LLC ("Lumos") for a Certificate of Convenience and Necessity to offer competitive telecommunications services in Tennessee. Exhibits D-1, D-2 and D-3 are confidential and filed under separate cover.

Enclosed is a check for then filing fee.

Please call or email me if you have any questions about this application.

Sincerely

BRADLEY ARANT BOULT CUMMINGS LLP

By: 
Henry Walker

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

_____)
In the Matter of the Application of)
Lumos Fiber of Tennessee, LLC)
for a Certificate of Convenience and)
Necessity to Provide Competing Local)
Exchange Services in the)
State of Tennessee)
_____)

Docket No. 26-00006

**APPLICATION FOR A CERTIFICATE TO PROVIDE
COMPETING LOCAL EXCHANGE
TELECOMMUNICATIONS SERVICES**

Pursuant to applicable Tennessee statutes and the rules of the Tennessee Public Utility Commission (“Commission”), Lumos Fiber of Tennessee, LLC (“Lumos” or “Applicant”), by and through its counsel, respectfully requests that the Commission grant Lumos authority to provide competing local exchange telecommunications services throughout Tennessee. Applicant is willing and able to adhere to all applicable Commission polices, rules, and orders pertaining to the provision of competing local exchange telecommunications services.

In support of its application, Lumos submits the following information:

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

Lumos Fiber of Tennessee, LLC
4100 Mendenhall Oaks Parkway
Suite 300
High Point, N.C. 27265
Tel: 855-465-8667

Questions regarding this application should be directed to:

Tim Pressley Manager, Regulatory Affairs 4100 Mendenhall Oaks Parkway Suite 300	or	Henry Walker Bradley Arant Boult Cummings LLP Tel: 615-397-1264 hwalker@bradley.com
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High Point, N.C. 27265
Tel: 366-821-8650
Tim.Pressley@Lumosfiber.com

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

Applicant is a direct, wholly owned subsidiary of Gridiron Fiber LLC (“Gridiron Fiber”). Applicant is managed by the management team of Gridiron Fiber, which provides extensive telecommunications business, technical, and managerial experience to the Applicant. Attached as **EXHIBIT A** is an organizational chart of Applicant’s corporate structure.

There is currently no applicable pertinent acquisition or merger information to detail.

3. **Corporate Information**

Applicant is a Tennessee limited liability company rather than a corporation. Applicant provides a copy of its formation documents as **EXHIBIT B**.

Applicant’s officers are:

Brian Stading	Chief Executive Officer
Heather Martin	Chief Financial Officer
David Smith	Chief Network Officer
AJ Brown	Chief Legal Officer
Tony DeGregorio	Chief Information Officer

There are no officers located within Tennessee. All officers may be reached at Applicant's principal place of business provided above.

4. **Managerial, Technical, and Financial Qualifications**

Lumos possesses the managerial, technical, and financial ability to provide telecommunications services in the State of Tennessee as demonstrated below:

A. Managerial Qualifications

Lumos has the managerial and technical qualifications necessary to provide the proposed services in the State of Tennessee. Biographies of key management personnel of Lumos, who are responsible for Lumos’s operations, are attached as **EXHIBIT C**. These biographies reflect management’s extensive communications industry experience and expertise across multiple jurisdictions. Thus, Lumos possesses the managerial and technical qualifications necessary to operate as a competing local exchange telecommunications company in the State of Tennessee, consistent with the Commission’s requirements.

B. General Technical Qualifications

To the extent required, Lumos will file and maintain tariffs in the manner prescribed by the Commission and will meet minimum basic local standards, including quality of service and billing standards required of all local exchange carriers regulated by the Commission. As noted in the biographies provided in **EXHIBIT C**, Lumos's operations will be overseen by a well-qualified management team with substantial telecommunications experience and technical expertise.

Applicant is currently authorized to provide telecommunications services in the following states: Alabama, Florida, Georgia, Illinois, Indiana, Kentucky, North Carolina, Ohio, South Carolina, and Virginia. Applicant has no pending applications at this time. Applicant has not been denied authority to provide telecommunications services in any state, nor has any state revoked the authority of Applicant to operate therein.

C. Financial Qualifications and Surety Bond

Applicant possesses the requisite financial resources to provide telecommunications services in the State of Tennessee. Applicant is a newly formed entity and has not begun operations; once it does, however, it will not maintain financial statements separate from the consolidated financial statements of Applicant's parent company, Gridiron Fiber. For purposes of this Application, Applicant will rely on the financial statements of Gridiron Fiber to demonstrate Applicant's financial qualifications to operate within the State of Tennessee. Applicant provides its latest audited financial statement as of March 31, 2025, provided as **CONFIDENTIAL EXHIBIT D-1**; Applicant's projected three-year financial statements, as **CONFIDENTIAL EXHIBIT D-2**; and Applicant's three-year capital expenditures budget as **CONFIDENTIAL EXHIBIT D-3**, indicating the cost and sources of funding for projected capital expenditures. As shown in these documents, Applicant has access to the financial liquidity and capital resources to fully fund its network deployment plans in Tennessee. Because the financial statements are confidential and contain proprietary information, the exhibit is filed under seal and Applicant requests that the financial statements provided as **CONFIDENTIAL EXHIBITS D-1, D-2, and D-3** be treated as confidential and proprietary and not be made part of the public record.

Applicant will provide the applicable surety bond or letter of credit in the amount of \$20,000 prior to beginning operations in Tennessee.

5. Proposed Service Area and Description of Services

Lumos seeks authority to provide facilities-based telecommunications services throughout the state of Tennessee through the provision of point-to-point telecommunications services for high-speed data transport and other high-bandwidth circuits to enterprise customers. Applicant does not intend to provide switched local services or seek authority to offer basic local exchange service.

Applicant proposes to build a fiber-based network in Tennessee, which Applicant plans to

construct to customer locations. Applicant does not currently own or lease facilities in Tennessee but plans to construct facilities to provide its services. Applicant will provide services to enterprise customers.

6. **Types of Telecommunications Services To Be Provided**

As noted in paragraph 5, Applicant will provide facilities-based point-to-point telecommunications services for high-speed data transport and other high-bandwidth circuits to enterprise customers. Applicant intends to provide its services using fiber optic cable along with other equipment and facilities to originate, terminate, and amplify signals. Applicant does not plan to furnish switched voice services or dial tone at this time. In the event that Applicant decides to expand its services to include voice services, as dictated by marketplace conditions, Applicant will seek such authority at that time and will provide those services required by Rule 1220-4-8-.04(3)(b).

7. **Repair and Maintenance**

Lumos will perform network and equipment maintenance necessary to ensure compliance with any applicable quality of service requirements; will comply with all applicable Commission rules, regulations, and standards; and will provide safe, reliable and high-quality telecommunications services within the State of Tennessee. Customer complaints and inquiries can be submitted via online via <https://www.lumosfiber.com/contact-us/#contact-form> or by calling Applicant's phone number at 855-465-8667. Written communication may be sent to 4100 Mendenhall Oaks Parkway, Suite 300, High Point, N.C. 27265.

Customer support will be available twenty-four (24) hours per day, seven (7) days per week to ensure the prompt handling of customer inquiries and complaints. Applicant will provide customers with high quality telecommunications services and maintain dedicated staff focused on customer support. Applicant will work with each customer to customize services for their specific needs, and each customer will have their own service agreement. The contact person responsible for and knowledgeable about the Applicant's ongoing operations in Tennessee is Tim Pressley, who may be reached at Applicant's address listed above.

8. **Small and Minority-Owned Telecommunications Business Participation Plan**

As required pursuant to TCA § 65-5-112, attached as **EXHIBIT E** is Applicant's plan for purchasing goods and services from small and minority telecommunications businesses and information on programs to provide technical assistance to such businesses.

9. **Toll Dialing Parity Plan**

Not applicable as Applicant does not offer toll voice service at this time.

10. **Notice Requirements**

Applicant has served notice of this Application to the eighteen (18) incumbent local exchange telephone companies, as well as the Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General with a statement regarding the Company's intention to operate throughout the State of Tennessee. Attached as **EXHIBIT F** is the Notice and a Certificate of Service confirming compliance.

11. **Numbering Issues**

Please see the statement provided in **EXHIBIT G**.

12. **Tennessee Specific Operational Issues**

Please see the statement provided in **EXHIBIT H**.

13. **Miscellaneous and Supporting Documentation**

- A. Attached as **EXHIBIT I** is the sworn pre-filed testimony of Derek T. Kelly on behalf of Applicant.
- B. Applicant plans to elect market regulation in accordance with T.C.A. § 65-5-109 and provide the services described in this Application on a de-tariffed basis. To the extent Applicant provides switched voice services in the future, it will submit a switched access tariff.
- C. Applicant does not currently plan to collect customer deposits but reserves the right to collect deposits from its customers in the State of Tennessee. Requirements for the collection of deposits will be included in any proposed tariffs that Lumos files with the Commission.
- D. As of the filing of this Application, neither Lumos nor its affiliates have been the subject of any formal complaints in any of the states within which Applicant is certified and currently providing service.
- E. Applicant seeks authority to provide non-switched local services statewide. Applicant does not seek authority to provide switched local services.

LIST OF EXHIBITS

EXHIBIT A – Organizational Chart

EXHIBIT B – Formation Documents

EXHIBIT C – Key Management Personnel Biographies

EXHIBIT D-1 – Audited Financial Statements

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT D-2 – Projected Financial Statements

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT D-3 – Capital Expenditures Budget

CONFIDENTIAL, FILED UNDER SEAL

EXHIBIT E – Small & Minority-Owned Telecommunications Business Participation Plan

EXHIBIT F – Notice of Application & Certificate of Service

EXHIBIT G – Numbering Issues

EXHIBIT H – Tennessee Specific Operational Issues

EXHIBIT I – Sworn Pre-filed Testimony

Exhibit A

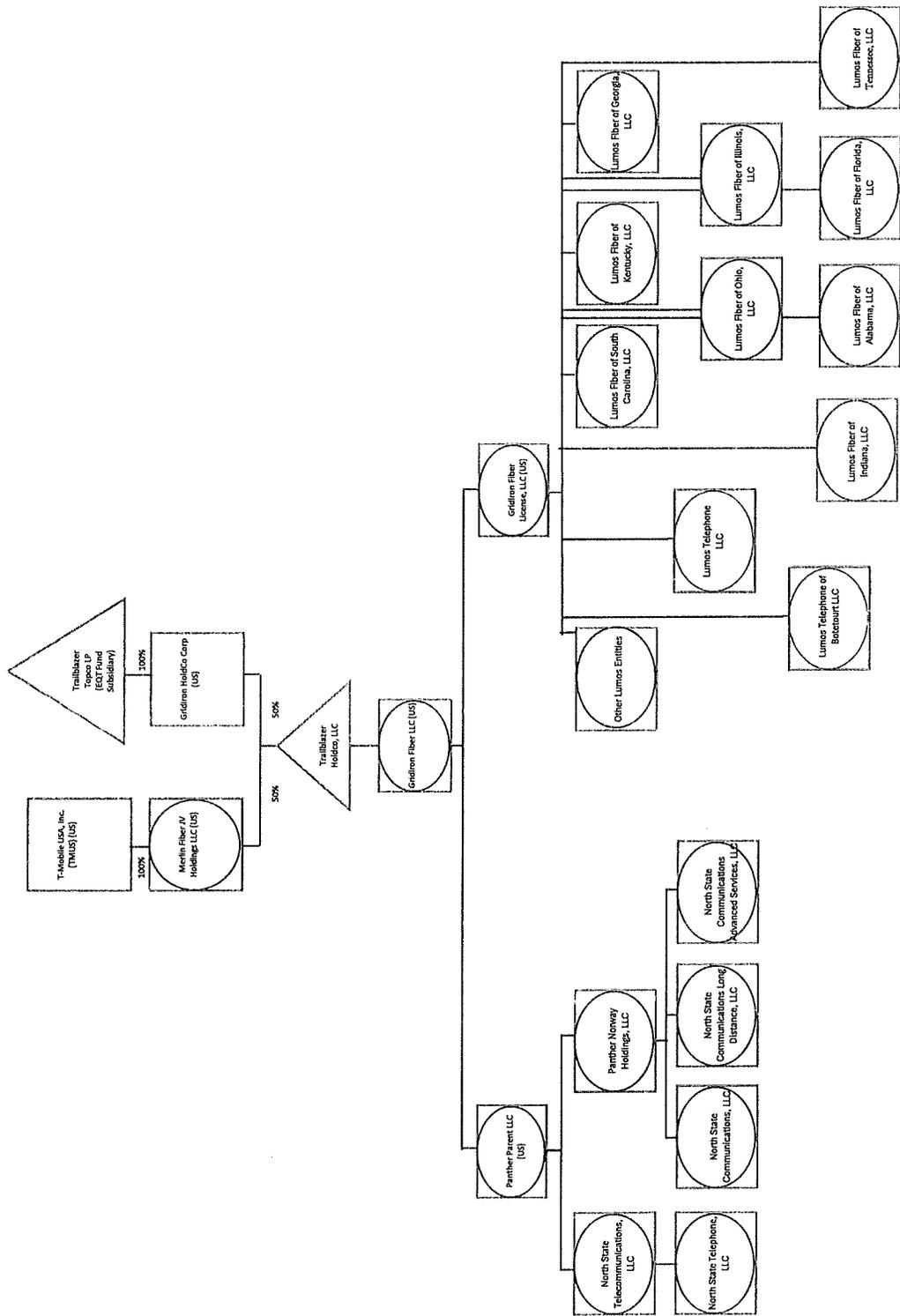


Exhibit B



Tre Hargett
Secretary of State

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/

ELLIE TWIGG
4100 MENDENHALL OAKS PARKWAY, SUITE 300
HIGH POINT, NC 27265, USA

04/10/2025

Filing Acknowledgment

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

Entity Name:	LUMOS FIBER OF TENNESSEE, LLC	Initial Filing Date:	04/10/2025
SOS Control #:	002013725	Formation Locale:	TENNESSEE
Entity Type:	Limited Liability Company (LLC)	Duration Term:	Perpetual
Status:	Active	Annual Report Due:	04/01/2026
Fiscal Year Close:	December	Business County:	(No County on Record)
Managed By:	Member Managed	Obligated Member Entity:	No

Document Receipt

Receipt #: 2025-269221	Filing Fee:	\$300.00
Payment: Credit Card - 3896182291		\$300.00

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

Principal Office Address:
4100 Mendenhall Oaks Pkwy Ste 300
High Point, NC 27265, USA

Congratulations on the successful filing of your Articles of Organization - Limited Liability Company for **LUMOS FIBER OF TENNESSEE, LLC** in the State of Tennessee which is effective **04/10/2025**. You must also file this document in the office of the Register of Deeds in the county where the entity has its principal office if such principal office is in Tennessee. 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

Tracking Number
B2025219458



Tre Hargett
Secretary of State

Articles Of Organization

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/businesses

Control #: 002013725
Filed: 04/10/2025 04:26 PM
Tre Hargett
Secretary of State

Entity Information

Entity Name: LUMOS FIBER OF TENNESSEE, LLC

Entity Type: Limited Liability Company

Fiscal Year Ending Month: December

Additional Designation: (No additional designation)

Series LLC ?

Yes No

Principal Office Address

4100 Mendenhall Oaks Pkwy Ste 300
High Point, NC 27265, USA

Mailing Address

4100 Mendenhall Oaks Pkwy Ste 300
High Point, NC 27265, USA

Period of Duration:

Perpetual

Will this filing have a delayed effective date?

Yes No

Nature of Business (NAICS):

517111 - Wired Telecommunications Carriers

Other Provisions:

(No other provisions)

Do you have additional uploads you would like to attach to this filing?

Yes No

Registered Agent Information

CORPORATION SERVICE COMPANY
2908 POSTON AVE
NASHVILLE, TN 37203-1312

Member Information

The Limited Liability Company will be: Member Managed

Do you have six or fewer members at the date of this filing?

Yes No

Number of Members at the date of filing:

Will this entity be registered as an Obligated Member Entity (OME)

Yes No

Organizer's Signature

By entering my name in the space provided below, I certify that I am authorized to file this document on behalf of this entity, have examined the document and, to the best of my knowledge and belief, it is true, correct and complete as of this day.

The undersigned, acting as organizer of the limited liability company under the provisions of the Tennessee Revised Limited Liability Company Act, adopt the above Articles of Organization.

Signed Electronically: ELLIE TWIGG

Date: 04/10/2025



Tre Hargett
Secretary of State

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/

Date: 04/10/2025

Invoice: 2025-269221

Customer Information

ELLIE TWIGG
LUMOS FIBER OF TENNESSEE, LLC
4100 MENDENHALL OAKS PARKWAY, SUITE 300
HIGH POINT, NC 27265, USA

Tracking #	Description	Amount Paid
B2025219458	Articles of Organization - Limited Liability Company for LUMOS FIBER OF TENNESSEE, LLC (LLC Filings)	\$ 300.00
Payment Details		
	Fee Total:	\$ 300.00
	Payment Total:	\$ 0.00
	Amount Due:	\$ 0.00
Payment Method		
	Payment Type: Credit Card	
	Check/Confirmation Number: 3896182291	

Exhibit C

Exhibit C

Managerial and Technical Qualifications

Applicant will be managed by the management team of its ultimate parent company, Gridiron Fiber LLC, which will provide extensive telecommunications business, technical, and managerial expertise to Applicant. Applicant's operations will be overseen by this well-qualified management team, which has substantial telecommunications experience and technical expertise. The management team can be reached through Applicant's principal place of business at 4100 Mendenhall Oaks Pkwy, Suite 300, High Point, NC 27265, or by telephone at 855-465-8667.

In support of Applicant's executive leadership and managerial qualifications, bios of Applicant's executive and senior management team are set forth below:

Brian Stading, Chief Executive Officer: Brian Stading is the Chief Executive Officer at Lumos. Reporting to Lumos' Board of Directors, he joins the Lumos executive team with a bold growth plan to expand the company's 100% Fiber Internet network to over one million homes in the next five years. Brian has a track record of proven leadership and success that spans over 30 years of experience at telecommunications companies, including Zply, CenturyLink and Qwest. He earned a bachelor's degree in Business Administration at Aurora University and a master's from the Kellogg Graduate School of Business at Northwestern University.

Heather Martin, Chief Financial Officer: Heather Martin is the Chief Financial Officer at Lumos, overseeing financial strategy, forecasting, analysis, accounting, and controls. With more than 25 years of experience in finance, operations, and leadership within the telecommunications industry, she has a proven track record of building high-performing teams that drive transformational and sustainable growth. Heather's career includes key roles at Deloitte, Ameritech, SBC, and AT&T. She holds a bachelor's degree in accounting from Miami University and a master's degree in organizational behavior from the University of Chicago.

David Smith, Chief Network Officer: David Smith is Chief Network Officer for Lumos, leading operations, engineering, outside plant, facilities, supply chain, safety, and product development teams. He has over 15 years of experience in information technology and telecommunications and has held numerous business management leadership roles, including Booz Allen consulting. David holds a B.S. in Information Systems Management from Bridgewater College and an MBA from Averett University.

A.J. Brown, Chief Legal Officer: A.J. Brown is Chief Legal Officer for Lumos, leading the company's legal, regulatory, and government affairs work. With over 15 years of legal experience, she previously held positions as Counsel to the Energy and Commerce Committee's Subcommittee on Communications and Technology in the United States House of Representatives and as Legal Advisor to the Federal Communications Commission's Incentive Auction Task Force, among others. A.J. earned a B.A. in Economics from Bates College and a J.D. from Yale Law School.

Tony DeGregorio, Chief Information Officer: Tony DeGregorio is Head of IT Transformation for Lumos, leading the company's digital strategy, cybersecurity and IT transformational enablement activities. Tony brings more than 30 years' of IT leadership experience with global organizations. Tony previously served as Senior Vice President and Chief Information Officer at Harsco Corporation and, earlier in his career was Chief Information Officer at Tyco Flow Control, a division of Tyco International, now Johnson Controls. Tony served in the US Navy and subsequently received an Associate of Science degree in Electro-Mechanical Drafting and Design from the American Institute of Design in Philadelphia, PA.

Sara Weiss, Senior Vice President, Human Resources: Sara Weiss is the Senior Vice President of Human Resources for Lumos, leading all HR functions and people initiatives. With 20 years of HR experience for high-growth organizations and over 15 years in the telecom industry, she excels at building high-performing teams and fostering an engaged workforce. Sara's degree in Commercial Art with a minor in Fine Arts from Southwest Baptist University enhances her creative approach to HR, enabling innovative program design and talent strategies. She has also served as secretary and HR counsel on the board of directors for the Down Syndrome Association of Greater Charlotte, demonstrating her commitment to community service and leadership.

Exhibit E

Small and Minority-Owned Telecommunications Business Participation Plan

Pursuant to T.C.A. §65-5-112, as amended, Lumos Fiber of Tennessee, LLC (“Lumos”) submits this Small and Minority-Owned Telecommunications Business Participation Plan (the “Plan”) along with its Application for a Certificate of Convenience and Necessity to provide competing local exchange and interexchange telecommunications services in the State of Tennessee.

1. Purpose

Pursuant to T.C.A. §65-5-112, Lumos is committed to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. As required by Tennessee law, Lumos 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, Lumos will make effort to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Lumos of such opportunities. Lumos’s representatives intend to 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, Lumos will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

2. 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).

3. Administration

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

Tim Pressley
Manager, Regulatory Affairs
4100 Mendenhall Oaks Parkway
Suite 300
High Point, N.C. 27265
Tel: 366-821-8650
Tim.Pressley@Lumosfiber.com

Applicant intends the Administrator's responsibilities to include:

- (1) Maintaining an updated Plan in full compliance with §65-5-112 and the rules and orders of the Tennessee Public Utilities 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 Lumos and training such persons to seek out, encourage, and promote the use of small and minority-owned businesses.

In performing these duties, the Administrator will use a number of resources, including:

Chambers of Commerce

The Tennessee Department of Economic and Community Development

The United States Department of Commerce

Small Business Administration Office of Minority Business

The National Minority Supplier Development Counsel

The National Association of Women Business Owners

The National Association of Minority Contractors

Historically Black Colleges, Universities, and Minority Institutions

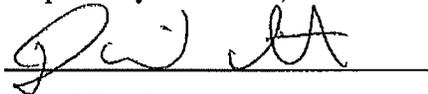
The efforts through which Applicant intends to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where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

4. Records and Compliance Reports

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

Lumos will submit records and reports required by the Tennessee Public Utility Commission concerning the Plan. Moreover, Lumos will cooperate fully with any surveys and studies required by the Tennessee Public Utilities Commission.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "David Smith", is written over a horizontal line.

David Smith
Chief Network Officer
Lumos

Exhibit F

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

IN THE MATTER OF THE APPLICATION)
OF LUMOS FIBER OF TENNESSEE, LLC)
FOR A 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 Tennessee Public Utility Commission Rules for the Provision of Competitive Intrastate Telecommunications Services, you are hereby given notice that Lumos Fiber of Tennessee, LLC filed an Application for a Certificate of Convenience and Necessity to Provide Competing Local Exchange and Interexchange Telecommunications Services.

This 22 day of January, 2026.

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

Counsel for Lumos Fiber of Tennessee, LLC

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
Attn: Lisa Wigington
8. Frontier Communications of Tennessee
300 Bland Street
Bluefield, WV 24701
9. Humphreys County Telephone Company
525 Junction Road
Madison, WI 53717
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
P.O. Box 24207
Jackson, MS 39225
Attn: Lisa Wigington
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

Exhibit G

Numbering Issues

Please provide answers to the following questions concerning numbering within your proposed service areas.

1. What is your company's expected demand for NXXs per NPA within a year of approval of your application?

Not applicable, as Applicant does not intend to provide voice services, including dial tone to end-user customers, at this time.

2. How many NXXs do you estimate that you will request from NANPA when you establish your service footprint?

Not applicable, as Applicant does not intend to provide voice services, including dial tone to end-user customers, at this time.

3. When and in what NPA do you expect to establish your service footprint?

Not applicable, as Applicant does not intend to provide voice services, including dial tone to end-user customers, at this time.

4. Will the company sequentially assign telephone numbers within NXXs?

Not applicable, as Applicant does not intend to provide voice services, including dial tone to end-user customers, at this time.

5. What measures does the company intend to take to conserve Tennessee numbering resources?

Not applicable, as Applicant does not intend to provide voice services, including dial tone to end-user customers, at this time.

6. When ordering new NXXs for growth, what percentage fill of an existing NXX does the company use to determine when a request for a new NXX will be initiated?

Not applicable, as Applicant does not intend to provide voice services, including dial tone to end-user customers, at this time.

Exhibit H

Tennessee Specific Operational Issues

Please provide answers to the following questions concerning Tennessee Specific Operational Issues.

1. How does the company intend to comply with TCA §65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee.

Not applicable. Lumos does not intend to provide voice services, including dial tone to end-user customers, at this time.

2. Is the company aware of the Tennessee County Wide Calling database maintained by BellSouth and the procedures to enter your telephone numbers in the database?

Not applicable. Although Lumos is aware of these requirements, Lumos will not issue telephone numbers as it does not intend to provide voice services to end-users at this time.

3. Is your company aware of the local calling areas provided by the Incumbent Local Exchange Carriers in your proposed service areas?

Yes, Lumos is aware of the ILEC calling areas.

4. Explain the procedures that will be implemented to assure that your customers will not be billed long distance charges for calls within the metro calling areas.

Not applicable. Lumos does not intend to provide voice services at this time.

5. Please provide the name and telephone number of an employee of your company that will be responsible to work with the TPUC on resolving customer complaints.

**Tim Pressley
Manager, Regulatory Affairs
4100 Mendenhall Oaks Parkway
Suite 300
High Point, N.C. 27265
Tel: 366-821-8650
Tim.Pressley@Lumosfiber.com**

6. Does the company intend to telemarket its services in Tennessee? If yes, is the company aware of the telemarketing statutes and regulations found in TCA §65-4-401 et seq. and Chapter 1220-4-11?

Applicant is aware of the above-referenced telemarketing statutes and regulations and will abide by them to the extent it undertakes telemarketing in Tennessee in the future.

Exhibit I

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

**In the Matter of the Application of)
Lumos Fiber of Tennessee, LLC)
for a Certificate of Convenience and)
Necessity to Provide Competing Local)
Exchange Telecommunications Services in the)
State of Tennessee)**

Docket No. _____

PRE-FILED TESTIMONY OF DEREK T. KELLY

I, Derek T. Kelly, do hereby testify as follows in support of the application of Lumos Fiber of Tennessee, LLC (“Lumos”) for a Certificate of Convenience and Necessity as a competing telecommunications services provider to provide telecommunications services throughout the State of Tennessee.

Q: Please state your full name, business address, and position.

A: My name is Derek T. Kelly. I am the Vice President, Market Development, and my business address is 4100 Mendenhall Oaks Parkway, Suite 300, High Point, N.C. 27265.

Q: Please briefly describe your duties.

A: I am the Vice President of Market Development at Lumos, where I lead market expansion strategy, state and local government relations, public-private partnerships, and broadband grant programs to drive fiber-to-the-premises (FTTP) growth. With a focus on collaboration and community engagement, my team and I work closely with local and state governments, industry stakeholders, and community partners to increase broadband access and bridge the digital divide.

Q: Please describe your business experience and educational background.

A: I have nearly 25 years of industry experience and have held leadership roles across sales, operations, and government affairs, which equips me with a well-rounded perspective on broadband expansion. Since joining Lumos in 2021, I have played a key role in the company's rapid growth and commitment to building future-proof fiber networks. Beyond my role at Lumos, I am actively involved in broadband advocacy. I previously served as Chairman of the Virginia Broadband Industry Association and Vice Chair of the Kramden Institute, a North Carolina-based nonprofit dedicated to closing the digital divide through computer refurbishing and digital literacy training.

Q: Are all statements in Lumos's application true and correct to the best of your knowledge, information, and belief?

A: Yes.

Q: Please describe the current corporate structure of Lumos.

A: Lumos is a duly formed limited liability company, organized under the laws of the State of Tennessee. Copies of Lumos's formation documents are included with the Application as **EXHIBIT B**. Applicant is a direct, wholly owned subsidiary of Gridiron Fiber LLC ("Gridiron Fiber"), a Delaware limited liability company.

Q: Does Lumos possess the requisite managerial, financial, and technical abilities to provide the services for which it has applied for authority?

A: Yes. Lumos has the managerial, technical, and financial qualifications necessary to provide the proposed services in Tennessee.

Q: Please describe Lumos's financial qualifications.

A: Lumos has sufficient financial resources to initiate and maintain the services and related operations in Tennessee as proposed in this Application. Applicant is providing financial

information for Lumos as **CONFIDENTIAL EXHIBITS D-1, D-2, and D-3**, which demonstrate the financial resources available to provide the proposed telecommunications services in Tennessee. Included with the aforementioned exhibit are the audited financial statements as of March 31, 2025; Applicant's three-year projected financial statements; and Applicant's three-year capital expenditure budget.

Q: Please describe Lumos's managerial and technical qualifications.

A: Lumos has the managerial qualifications necessary to provide the proposed service in Tennessee, as Lumos is managed by a well-qualified and highly skilled team with substantial expertise and experience. The biographies included with the Application as **EXHIBIT C** reflect management's substantial communications industry experience and expertise and demonstrate that the Applicant possesses significant managerial and technical expertise operating a variety of communications services across multiple jurisdictions. Thus, Lumos possesses the managerial and technical qualifications necessary to operate as a competing local telecommunications company in Tennessee, consistent with the Commission's requirements.

Q: What services will Lumos offer?

A: Lumos proposes to build a fiber-based network in Tennessee, which Lumos plans to construct to customer locations. Lumos will provide point-to-point telecommunications services, such as Ethernet and other similar high-bandwidth services, for high-speed data transport. Lumos will provide services primarily using its own facilities. Lumos does not currently own or lease facilities in Tennessee but plans to construct facilities to provide its services. Lumos intends to provide its services using fiber optic cable along with other equipment and facilities to originate, terminate, and amplify signals. Lumos does not plan to furnish switched voice services or dial tone at this time.

Q: Will Lumos offer services to all consumers within its service area?

A: Lumos does not plan to provide retail switched voice services, including dial tone, to end-user customers in Tennessee. Applicant will provide regulated services to enterprise customers in the State of Tennessee and does not intend to serve residential customers with regulated services.

Q: Does Lumos plan to offer local exchange telecommunications services in areas served by any incumbent local exchange telephone company with fewer than 100,000 total access lines?

A: Lumos does not plan to offer local exchange telecommunications services in areas served by any incumbent local exchange telephone company with fewer than 100,000 total access lines. Lumos does not have plans to provide retail switched voice services, including dial tone. To the extent Applicant will provide switched local services in the future, it only seeks authority to provide such services in service territories that are open to competition.

Q: Will the granting of a certificate of convenience and necessity to Lumos serve the public interest?

A: Granting this Application will promote the public interest by increasing the level of competition in the Tennessee telecommunications market. Ultimately, competition will compel all exchange telecommunications service providers to operate more efficiently and with resulting reduced prices for consumers. These benefits work to maximize the public interest by providing continuing incentives for carriers to reduce costs while simultaneously promoting the availability of potentially desirable services. Lumos's provision of these services would promote the public interest by providing high-quality service at competitive prices and by creating greater economic incentives for the development and improvement for all competing providers.

Q: Does Lumos intend to comply with all TPUC rules, statues, and orders pertaining to the

provision of telecommunications services in Tennessee, including those for disconnection and reconnection of service?

A: Yes, Lumos will comply with TPUC rules, statutes, and orders pertaining to the telecommunications services it provides.

Q: Has any state ever denied Lumos or one of its affiliates authorization to provide intrastate service?

A: No, neither Lumos nor its affiliates have been denied authority to provide telecommunications services in any state or jurisdiction.

Q: Has any state ever revoked the certification of Lumos or one of its affiliates?

A: No, neither Lumos nor its affiliates have had its authority to provide telecommunications services in any state revoked.

Q: Has Lumos or one of its affiliates ever been investigated or sanctioned by any regulatory authority for service or billing irregularities?

A: No, neither Lumos nor its affiliates have been the subject of any investigation or sanctioned by any regulatory authority for service or billing irregularities.

Q: Who is knowledgeable about Lumos's operations and will serve as Lumos's regulatory and customer service contact?

A: Tim Pressley will serve as Lumos's Regulatory and Customer Service Contact. Customer complaints and inquiries can be submitted via email to <https://www.lumosfiber.com/contact-us/#contact-form> or by calling Applicant's toll-free phone number at 855-465-8667.

Q: Please explain in detail Lumos's proposed procedures for responding to information requests from the TPUC and its staff.

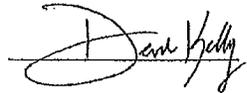
A: Information requests related to this application should be directed to our counsel set forth in

the Application, with a copy to me. Together, we will prepare a response and ensure the response is filed promptly and by any deadline set by staff.

Q: Does this conclude your testimony?

A: Yes.

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

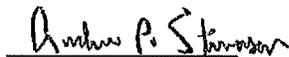


Derek Kelly

Vice President, Market Development

Lumos Fiber of Tennessee, LLC

Respectfully submitted this 6th day of October, 2025



Notary Public

My Commission expires:

