

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**IN THE MATTER OF THE APPLICATION  
OF LTS TELECOMMUNICATIONS  
SERVICES (USA) INC. FOR A  
CERTIFICATE TO PROVIDE COMPETING  
LOCAL AND INTEREXCHANGE  
TELECOMMUNICATION SERVICES**

**Docket No. 26-00052**

**APPLICATION FOR CERTIFICATE TO PROVIDE COMPETING LOCAL AND  
INTEREXCHANGE TELECOMMUNICATIONS SERVICES**

Pursuant to applicable Tennessee Statutes and the Rules and Regulations of the Tennessee Public Utility Commission (“TPUC”) and Section 253 of the Federal Telecommunications Act of 1996 (“Act”), LTS Telecommunications Services (USA) Inc. (“Applicant”) respectfully requests that the TPUC grant to Applicant the authority to offer competing local and interexchange telecommunications services, including exchange access telecommunications services statewide within the State of Tennessee. Applicant is willing and able to comply with all applicable rules and regulations in Tennessee pertaining to the provision of competing local telecommunications services, pursuant to TCA 65-4-201.

In support of its Application, Applicant submits the following:

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

LTS Telecommunications Services (USA) Inc.  
6405 Mira Mesa Blvd., Suite 200  
San Diego, California, 92121  
Phone: (857) 527-6400  
Facsimile: (858) 527-6464  
Website: <https://www.ledcor.com>

Questions regarding this application should be directed to:

Noah J. Mason  
Troutman Pepper Locke LLP  
600 Peachtree Street, NE, Suite 3000  
Atlanta, Georgia 30308  
Phone: (404) 870-4648  
Email: [Noah.Mason@troutman.com](mailto:Noah.Mason@troutman.com)

*With a copy to:*

Victor Noriega  
Jeffrey Strenkowski  
Troutman Pepper Locke LLP  
600 Peachtree Street, NE, Suite 3000  
Atlanta, Georgia 30308  
Phone: (404) 885-3037  
Email: [Victor.Noriega@troutman.com](mailto:Victor.Noriega@troutman.com)  
[jeff.strenkowski@troutman.com](mailto:jeff.strenkowski@troutman.com)

Contact name and address at the Company is:

Gale Williams  
Director, Business Operations, US Infrastructure  
500 Meijer Way  
Suite 200  
Florence, Kentucky, 41042  
Phone: (859) 286-8114  
Email: [Gale.williams@ledcor.com](mailto:Gale.williams@ledcor.com)

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

Please see **Exhibit A**, attached.

3. Corporate Information.

Applicant was incorporated in the state of Delaware on November 7, 2017. A copy of Applicant's Articles of Incorporation and amendments are provided in **Exhibit B**. A copy of Applicant's Authority to Transact Business in the State of Tennessee is provided in **Exhibit C**. The names and addresses of Applicant's directors and principal corporate officers are in **Exhibit D**. There are no officers located within Tennessee.

4. Applicant possesses the managerial, technical, and financial ability to provide local telecommunications service in the State of Tennessee as demonstrated below:

A. Managerial and Technical Qualifications

Applicant has the managerial and technical qualifications necessary to provide the proposed services in the State of Tennessee. Applicant is staffed and managed with highly qualified directors, officers, and employees with substantial experience and expertise. Applicant is a part of the Leducor Group of Companies. The Leducor Group of Companies is an industry leader in infrastructure construction, operation, and maintenance. Along with the constant support of a historically successful franchise of companies, the combined experience of Applicant's key personnel provides Applicant the managerial and technical skills necessary to reliably provide the services proposed in this Application. The biographies of the key principal officers and other technical staff are provided in **Exhibit E**.

B. Financial Qualifications and Surety Bond

Applicant possesses the requisite financial resources to provide services in the state of Tennessee. Applicant's financial statements for 2023, 2024, and 2025 are attached as **CONFIDENTIAL Exhibit F**. As evidenced by **CONFIDENTIAL Exhibit F**, Applicant has sufficient financial resources to operate in the state of Tennessee. Because Applicant is a privately held company, Applicant requests that the financial statements appended hereto as "CONFIDENTIAL" be treated as Confidential.

Because Applicant does not own or operate equipment in Tennessee with a value of more than \$5,000,000, Applicant has provided a corporate surety bond in the amount of \$20,000 as **Exhibit G**, pursuant to T.C.A. § 65-4-125.

5. Proposed Service Area and Description of Services

Applicant seeks authority to offer resold and facilities-based competing local and interexchange services, including point-to-point high-capacity services (*i.e.*, private line, Ethernet, and Wavelength). Applicant's business is primarily focused on serving large enterprise customers at competitive rates through individual case basis contracts. Applicant requests authority to offer non-switched local exchange (non-voice) statewide. Applicant intends to construct its own fiber-optic facilities and anticipates providing key route and service maintenance on all of its constructed fiber facilities.

6. Repair and Maintenance

Applicant will perform network and equipment maintenance necessary to ensure compliance with any applicable quality of service requirements, will comply with all applicable TPUC rules, regulations, and standards. Applicant's customers can call the company at its toll-free customer service number: 877-859-1155. Customers may also contact Applicant's Director of Field Operations, Bernard Mathews, via email at

[Bernard.Mathews@ledcor.com](mailto:Bernard.Mathews@ledcor.com). Additionally, Customers can contact Applicant in writing at the address listed in Section 1.

7. Small and Minority-Owned Telecommunications Business Participation Plan

Please see **Exhibit H**, attached.

8. Toll Dialing Parity Plan

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

9. Notice of Application and Certificate of Service

Applicant has served notice of this application to the fifteen (15) incumbent local exchange telephone companies in Tennessee with a statement regarding the company's intention of operating geographically. Please see **Exhibit I** for Applicant's Notice of Application and Certificate of Service.

10. Numbering Issues

Please see **Exhibit J**, attached.

11. Tennessee Specific Operational Issues

Please see **Exhibit K**, attached.

12. Miscellaneous and Supporting Documentation

A. Pre-Sworn Testimony

Attached as **Exhibit L** is the pre-filed testimony of Michael Murray, Senior Vice President of Operations and US Infrastructure, on behalf of Applicant.

B. Certification in Other States

LTS Telecommunications Services (USA) Inc. is certified to offer telecommunications services in Georgia, Iowa, Illinois, Indiana, Louisiana, Minnesota, Nebraska, South Dakota, North Dakota, Texas, Wisconsin, Wyoming, Ohio, Arkansas, Kentucky and Montana. LTS Telecommunications Services (USA) Inc. has an application pending in Idaho. LTS's affiliate, LTS Telecom Services (EAST) LLC, is certified to offer telecommunications services in Virginia, Maryland, and Oregon.

C. Tariff

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.

D. Customer Deposits

Applicant does not currently plan to collect customer deposits but reserves the right to do so in the future. Requirements for the collection of deposits will be included in any proposed tariffs that Applicant files with the TPUC.

In conclusion, this Application demonstrates that Applicant possesses the requisite technical, financial and managerial resources to provide service in the State of Tennessee. Furthermore, granting this Application will promote the public interest by increasing the level of competition in the Tennessee market. Ultimately, competition will compel all service providers to operate more efficiently, resulting in reduced prices for customers. Applicant's participation in the Tennessee market 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.

Wherefore, Applicant respectfully requests that the TPUC grant a Certificate of Convenience and Necessity to provide competing telecommunications service throughout the State of Tennessee.

This 29th day of June, 2026.

Respectfully Submitted,

/s/ Noah J. Mason

Noah J. Mason

Tennessee Bar No. 034341

Troutman Pepper Locke, LLP

600 Peachtree Street NE, Suite 3000

Atlanta, Georgia 30308

Phone: (404) 870-4648

Email: [Noah.Mason@troutman.com](mailto:Noah.Mason@troutman.com)

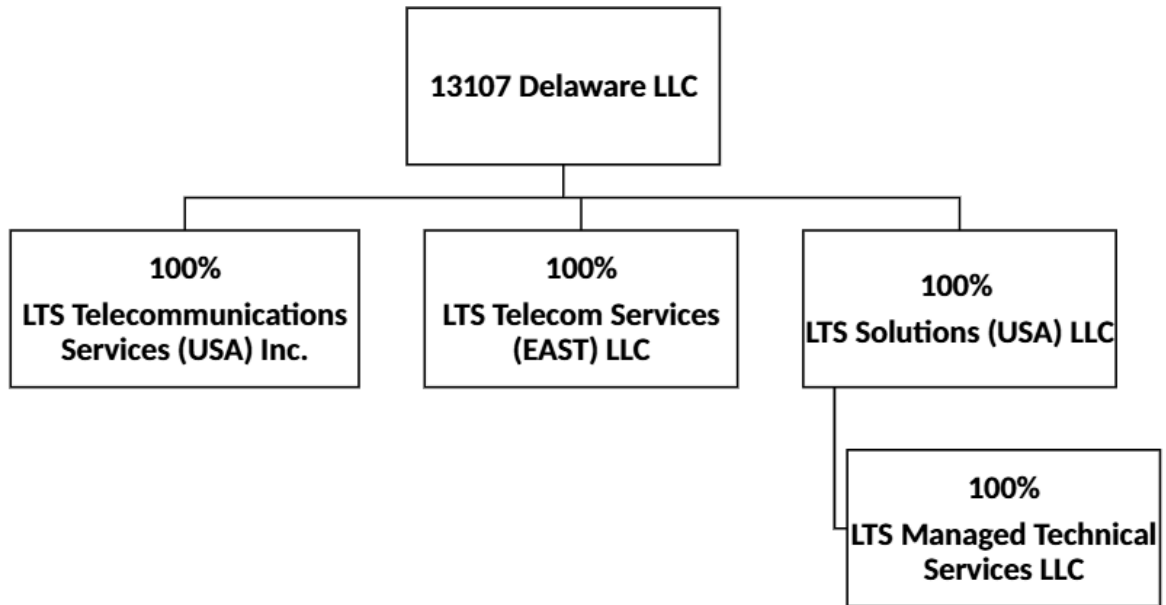
*Counsel for LTS Telecommunications  
Services (USA) Inc.*

## Exhibits List

<b>Exhibit A</b>	Organizational Structure
<b>Exhibit B</b>	Articles of Incorporation
<b>Exhibit C</b>	Authority to Transact Business in the State of Tennessee
<b>Exhibit D</b>	Officers and Directors
<b>Exhibit E</b>	Biographies of Key Management and Personnel
<b>CONFIDENTIAL Exhibit F</b>	Financial Statements
<b>Exhibit G</b>	Surety Bond
<b>Exhibit H</b>	Small and Minority-Owned Telecommunications Business Participation Plan
<b>Exhibit I</b>	Notice of Application and Certificate of Service
<b>Exhibit J</b>	Numbering Issues
<b>Exhibit K</b>	Tennessee Specific Operational Issues
<b>Exhibit L</b>	Pre-Sworn Testimony of Michael Murray

Exhibit A

**LTS Telecommunications Services (USA) Inc. Organizational Structure**



**Exhibit B**

**LTS Telecommunications Services (USA) Inc. Articles of Incorporation**

[Attached]

# Delaware

Page 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF INCORPORATION OF "LTS TELECOMMUNICATIONS SERVICES (USA) INC.", FILED IN THIS OFFICE ON THE SEVENTH DAY OF NOVEMBER, A.D. 2017, AT 1:58 O`CLOCK P.M.

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



  
Jeffrey W. Bullock, Secretary of State

6607436 8100  
SR# 20176972529

Authentication: 203538972  
Date: 11-08-17

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

STATE OF DELAWARE  
CERTIFICATE OF INCORPORATION  
A STOCK CORPORATION

The undersigned Incorporator, desiring to form a corporation under pursuant to the General Corporation Law of the State of Delaware, hereby certifies as follows:

1. The name of the Corporation is LTS Telecommunications Services (USA) Inc..
2. The Registered Office of the corporation in the State of Delaware is located at 251 Little Falls Drive (street),  
in the City of Wilmington, County of New Castle  
Zip Code 19808. The name of the Registered Agent at such address upon  
whom process against this corporation may be served is Corporation Service Company.
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 Delaware.
4. The total amount of stock this corporation is authorized to issue is  
5,000 shares (number of authorized shares) with a par value of  
\$ 0.01 per share.
5. The name and mailing address of the incorporator are as follows:  
Name Karen Graham  
Mailing Address 6405 Mira Mesa Blvd., Suite 100  
San Diego, CA Zip Code 92121

By: Karen Graham  
Incorporator

Name: Karen Graham  
Print or Type

**Exhibit C**

**LTS Telecommunications Services (USA) Inc.  
Authority to Transact Business in the State of Tennessee**

[Attached]



**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  
tncab.tnsos.gov/portal/

CORPORATION SERVICE COMPANY  
251 LITTLE FALLS DRIVE  
WILMINGTON, DE 19808, USA

03/05/2026

## Filing Acknowledgment

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

Entity Name:	LTS TELECOMMUNICATIONS SERVICES (USA) INC.		
SOS Control #:	002091937	Initial Filing Date:	03/03/2026
Entity Type:	Foreign For-profit Corporation	Formation Locale:	Delaware
Status:	Active	Duration Term:	Perpetual
Fiscal Year Close:	August	Annual Report Due:	12/01/2026
Business County:	(No County on Record)		

### Document Receipt

Receipt #: 2026-233094	Filing Fee:	\$600.00
Payment: Credit Card - 3916589484		\$600.00

Congratulations on the successful filing of your Application for Certificate of Authority - Foreign For-Profit Corporation for **LTS TELECOMMUNICATIONS SERVICES (USA) INC.** in the State of Tennessee which is effective on the date shown above. Please visit the Tennessee Department of Revenue website ([www.tn.gov/revenue](http://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  
B2026181290

## Application For Certificate Of Authority



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

[tncab.tnsos.gov/portal/](http://tncab.tnsos.gov/portal/)

Control #: 002091937  
Filed: 03/03/2026 12:46 PM  
Tre Hargett  
Secretary of State

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### Entity Information

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**Entity Type:** For-Profit Corporation

**Entity Name:** LTS TELECOMMUNICATIONS SERVICES (USA) INC.

**Fiscal Year Ending Month:** August

**Additional Designation:** (No Additional Designation)

**Principal Office Address**

6405 MIRA MESA BLVD STE 200  
SAN DIEGO, CA 92121, USA

**Mailing Address**

6405 MIRA MESA BLVD STE 200  
SAN DIEGO, CA 92121, USA

**When and Where was the Organization Established?**

Date Incorporated: 11/7/2017

Country: USA

State: Delaware

**Period of Duration:**

Perpetual

**Did the business commence doing business in Tennessee prior to qualification?**

Yes  No

**Nature of Business (NAICS):**

517111 - Wired Telecommunications Carriers

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

Yes  No

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### Officer Information

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JIMMY BYRD

Officer

14400 THE LAKES BLVD. SUITE 100,  
BUILDING C  
PFLUGERVILLE, TX 78660, USA

JOHN KUMP

Officer

1500 - 1067 WEST CORDOVA STREET  
VANCOUVER, BC V6C 1C7, Canada

IAIN MORRIS

Officer, Director

1500 - 1067 WEST CORDOVA STREET  
VANCOUVER, BC V6C 1C7, Canada

THOMAS LOFARO

Secretary, Director

6405 MIRA MESA BLVD., SUITE 200  
SAN DIEGO, CA 92121, USA

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## Registered Agent Information

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

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## Signature

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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.

Pursuant to the provisions of T.C.A. § 48-25-103 of the Tennessee Business Corporation Act, the undersigned corporation hereby applies for a certificate of authority to transact business in the State of Tennessee.

**Signed Electronically:** THOMAS LOFARO

**Date:** 03/03/2026

# Delaware

The First State

I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "LTS TELECOMMUNICATIONS SERVICES (USA) INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-FIFTH DAY OF FEBRUARY, A.D. 2026.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "LTS TELECOMMUNICATIONS SERVICES (USA) INC." WAS INCORPORATED ON THE SEVENTH DAY OF NOVEMBER, A.D. 2017.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.



6607436 8300

SR# 20260827812

You may verify this certificate online at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)

A handwritten signature in black ink that reads "C. P. Sanchez".

Charuni Patibanda-Sanchez, Secretary of State

Authentication: 203191128

Date: 02-25-26



**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  
[tncab.tnsos.gov/portal/](http://tncab.tnsos.gov/portal/)

**Date:** 03/03/2026

**Invoice:** 2026-233094

**Customer Information**

CORPORATION SERVICE COMPANY  
LTS TELECOMMUNICATIONS SERVICES (USA) INC.  
251 LITTLE FALLS DRIVE  
WILMINGTON, DE 19808, USA

Tracking #	Description	Amount Paid
B2026181290	Application for Certificate of Authority - Foreign For-Profit Corporation for LTS TELECOMMUNICATIONS SERVICES (USA) INC. (Corporation Filings)	\$ 600.00
<b>Payment Details</b>		
	Fee Total:	\$ 600.00
	Payment Total:	\$ 600.00
	Amount Due:	\$ 0.00
<b>Payment Method</b>		
	Payment Type: Credit Card	
	Check/Confirmation Number: 3916589484	

## Exhibit D

### LTS Telecommunications Services (USA) Inc. Officers and Directors

#### OFFICERS

<b>Name</b>	<b>Address</b>	<b>Titles</b>	<b>Commenced</b>
Jimmy Byrd	14400 The Lakes Blvd. Suite 100, Building C Pflugerville, Texas, USA 78660	Executive Vice President, Corporate Development	September 1, 2023
John Kump	1500 - 1067 West Cordova Street Vancouver, BC V6C 1C7	Executive Vice President & Chief Financial Officer	December 16, 2019
Iain Morris	1500 - 1067 West Cordova Street Vancouver, BC V6C 1C7	Executive Vice President, Ledcor Technical Services	December 15, 2024
Thomas Lofaro	6405 Mira Mesa Blvd., Suite 200 San Diego, California, USA 92121	Chief Legal Officer & Corporate Secretary	December 15, 2022
Ashwin Chitamun	6405 Mira Mesa Blvd., Suite 200 San Diego, California, USA 92121	Senior Vice President, Business Development	November 7, 2017
Farran Hobbs	1500 - 1067 West Cordova Street Vancouver, BC V6C 1C7	Senior Vice President, Services & Operations	July 25, 2025
Michael Murray	14400 The Lakes Blvd. Suite 100, Building C Pflugerville, Texas, USA 78660	Senior Vice President, Operations, US Infrastructure	May 1, 2023
Harminder Gill	1500 - 1067 West Cordova Street Vancouver, BC V6C 1C7	Senior Vice President, Strategy & Business Development	September 1, 2023
Benjamin Martin	1500 - 1067 West Cordova Street Vancouver, BC V6C 1C7	Senior Vice President, Finance & Risk Management	November 1, 2024
Christopher Wales	1500 - 1067 West Cordova Street Vancouver, BC V6C 1C7	Vice President, Taxation	November 7, 2017

#### DIRECTORS

<b>Name</b>	<b>Address</b>	<b>Commenced</b>
Thomas Lofaro	6405 Mira Mesa Blvd., Suite 200, San Diego, California, USA 92121	November 7, 2017
Iain Morris	1500 - 1067 West Cordova Street, Vancouver, BC V6C 1C7	September 1, 2023

**Exhibit E**

**Biographies of Key LTS Telecommunications Services (USA) Inc. Management and Personnel**

The following tables provide brief biographies of Applicant’s key personnel and verifies that Applicant has the technical and managerial experience to provide the needed telecommunications services proposed in this Application.

<b>Jimmy Byrd</b>
<b>Title:</b> Executive Vice President, Corporate Development
<b>Experience:</b> Mr. Byrd has been in the telecommunications industry since 1998 and has held multiple Senior Executive Sales and “C” level roles with well-known companies such as Level 3 and 360networks in the US, Europe, and Canada. His experience includes the financing and building of Level 3’s entire US backbone dark fiber network and the subsequent sales of dark fibers to a number of US-based ILECS and CLECS. In addition, Mr. Byrd was the Chief Operating Officer of 360networks that also built and maintained many dark fiber networks across the U.S. Mr. Byrd has been with LTS since 2003 and held the position of President from 2003–2023. His experience is in all aspects related and relevant to the services Applicant proposes to provide in the Application.
<b>Years of Experience:</b> 25+

<b>Ashwin Chitamun</b>
<b>Title:</b> Senior Vice President of Business Development
<b>Experience:</b> Mr. Chitamun has been in the telecommunications industry since 1990 and has held multiple operational, engineering, and sales roles with well-known telecommunications companies such as AT&T, Bell Canada, and 360networks in the U.S., Europe, and Canada. His experience includes overseeing the construction, maintenance, and operations of dark fiber networks (more than 7,000 miles). Mr. Chitamun has been with LTS since 2003. His experience is in all aspects related and relevant to the services Applicant proposes to provide in the Application. Mr. Chitamun has a Bachelor of Electrical Engineering from the University of Ottawa and a Master of Business Administration from the Anderson Business School at UCLA.
<b>Years of Experience:</b> 31

<b>Harminder Gill</b>
<b>Title:</b> Senior Vice President of Strategy and Business Development
<b>Experience:</b> Mr. Gill has been in the telecommunications industry since 1990 and has held multiple engineering, operational, financial, regulatory, and marketing roles in both large incumbent ILECs and smaller start-up firms. He was core to the team that started up what eventually became 360networks, an international wholesaler communications services provider, and went on to provide product, technology, and operations leadership as the CTO. Mr. Gill has been with LTS since 2009. His experience is in all aspects related and relevant to the services Applicant proposes to provide in the Application.
<b>Years of Experience:</b> 31

<b>Michael Murray</b>
<b>Title:</b> Senior Vice President of Operations and US Infrastructure
<b>Experience:</b> Mike current serves as Senior Vice President of Infrastructure and is responsible for execution of all Outside Plant telecommunications projects in the U.S. Mike joined Leducor in 2015 as a Vice President and recently completed a private, 2400-mile Design Build fiber network, LTS's largest single project to date. Mike has more than thirty years of experience in Project and Program management in highly technical and complex industries. He has both a Master of Business Administration from the University of Central Florida in 1993 and a Bachelor of Science of Mechanical Engineering degree from Bradley in 1987. Mike also leads LTS's Innovation committee, leading the division's efforts to implement new technologies and processes.
<b>Years of Experience:</b> 30+

<b>Thomas Lofaro</b>
<b>Title:</b> Chief Legal Officer & Corporate Secretary
<p><b>Experience:</b> Tom joined the Leducor Group in 2006 as Corporate Counsel in the company's US headquarters in San Diego to manage and oversee all US legal responsibilities. In 2018, Tom was promoted to General Counsel &amp; Corporate Secretary. Since 2023 Tom has served as Chief Legal Officer, where he is responsible for directing the overall delivery of legal service across the Leducor Group of Companies. In addition to leading the long-term direction of Leducor's legal team and developing and executing the department's strategic plan, his primary day-to-day responsibilities include general oversight of company litigation, negotiating and managing construction contracts and commercial transactions for the company's business units, and assisting executive management in developing business strategies to meet company objectives.</p> <p>Prior to joining Leducor, Tom was in private law practice focusing on the representation of small to medium-sized businesses with a specific concentration on business/commercial transactions and construction disputes. Tom's legal career began at a business and construction defect litigation firm based in Orange County, CA. Tom received his Bachelor of Arts degree in Liberal Arts and Sciences with an emphasis on International Commerce from San Diego State University and his Juris Doctor degree from the Thomas Jefferson School of Law. He is licensed to practice in all courts in the State of California, as well as the U.S. District Court (Central District of California) and the United States Supreme Court.</p>
<b>Years of Experience:</b> 17+

<b>Iain Morris</b>
<b>Title:</b> Executive Vice President, Leducor Technical Services
<p><b>Experience:</b> Iain joined Leducor in 1997 and, during his tenure, has successfully executed many high-profile projects from inception to completion. Iain's experience at Leducor has been diverse, and he has led teams in the Mining, Civil, Telecommunications, and Pipeline sectors across North America. Iain oversaw the construction of several thousand kilometers of fiber optic networks and has been responsible for more than \$400,000,000 of capital projects. Iain attended the University of British Columbia, where he received a Bachelor of Applied Science, Civil Engineering in 1995.</p>
<b>Years of Experience:</b> 25+

<b>Farran Hobbs</b>
<b>Title:</b> Senior Vice President of Services & Operations
<b>Experience:</b> Farran has 25+ years of senior-level operations and finance experience focused on driving operational excellence and strategic focus across a broad range of industries and teams. Farran is experienced in leading operational, project support services, technical and financial teams, and driving for results. As part of the LTS Executive team, Farran is responsible for the design and build of end-to-end fiber to the home programs, overseeing US and Canadian telecommunication Field Operations, EFIT teams, and internal support services teams for design-build programs, including project services, supply chain & logistics, fleet, and systems. Farran holds a Bachelor of Commerce (International Business & Finance) degree from the University of British Columbia.
<b>Years of Experience:</b> 25+

<b>Benjamin Martin</b>
<b>Title:</b> Senior Vice President of Finance and Risk Management
<b>Experience:</b> Ben is currently responsible for the financial reporting, enterprise financial systems, risk management, business improvement, facilities, and travel teams of the Leducor Group. Ben joined Leducor in 2005 and has held various roles within the finance organization, beginning in 2005 as the Corporate Controller. He continues to be responsible for maintaining the relationships with Leducor's auditors. Ben provides leadership to various support services and, over the last ten years, has been leading the development of Leducor's alternative risk strategies, including captive insurance. Ben holds a Combined Honors from the University of Exeter, UK. He is also a Chartered Professional Accountant in British Columbia and a Chartered Accountant in England and Wales.
<b>Years of Experience:</b> 20+

<b>Christopher Wales</b>
<b>Title:</b> Vice President of Taxation
<b>Experience:</b> As Vice President of Taxation, Chris Wales is responsible for developing, implementing, managing, and defending the Company's worldwide tax strategies, global tax compliance, and financial tax reporting. Chris reports to the CFO and works closely with the Company's major shareholders, business unit executives, and Chief Legal Officer to ensure all parties' interests are aligned regarding matters pertaining to taxation. Chris joined Ledcor in 2006. Throughout the course of the sixteen years prior to joining Ledcor, Chris held a number of tax management positions at both private and public companies. Chris has a Bachelor of Commerce from the University of British Columbia and is a Chartered Professional Accountant in British Columbia.
<b>Years of Experience:</b> 30

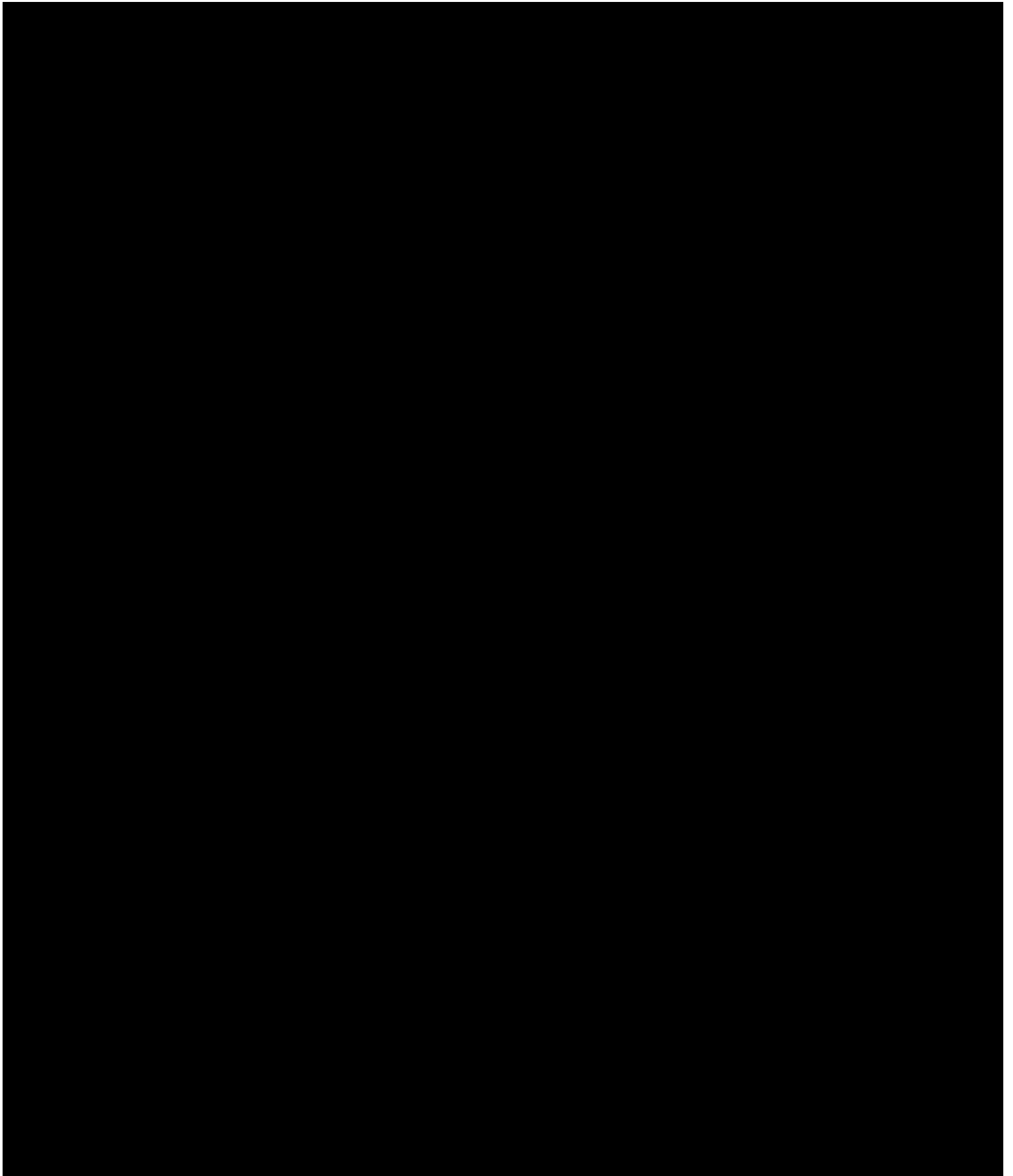
<b>John Kump</b>
<b>Title:</b> Executive Vice President & Chief Financial Officer
<b>Experience:</b> As CFO, John Kump is responsible for the overall financial management of the Ledcor Group, including all financial reporting, taxation, risk management, and treasury activities. John Kump started with Ledcor in 2001 and has held progressive financial and general management functions beginning as a Financial Controller. Most recently, as Chief Administration Officer (CAO), John provided overall leadership for several of Ledcor's key shared services, including Human Resources, Information Services, and the Ledcor Equipment Group. John also oversees Ledcor's concession investments and pursuits of Public-Private-Partnership (P3) projects. John holds an MBA from Queen's University and a Bachelor of Commerce from the University of British Columbia. He is also a Chartered Professional Accountant in British Columbia and Certified Public Accountant in the United States.
<b>Years of Experience:</b> 21

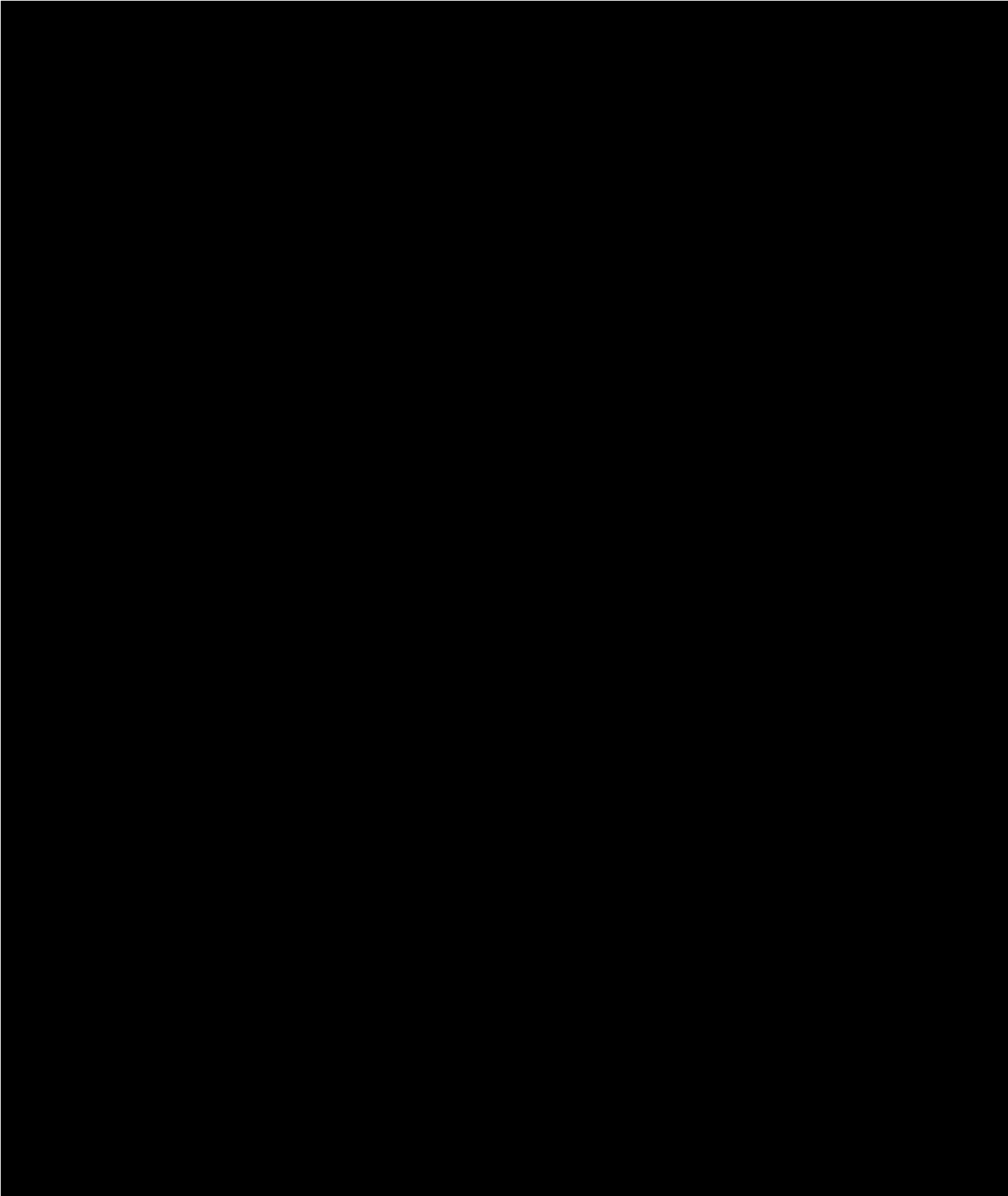
**CONFIDENTIAL - FILED UNDER SEAL**

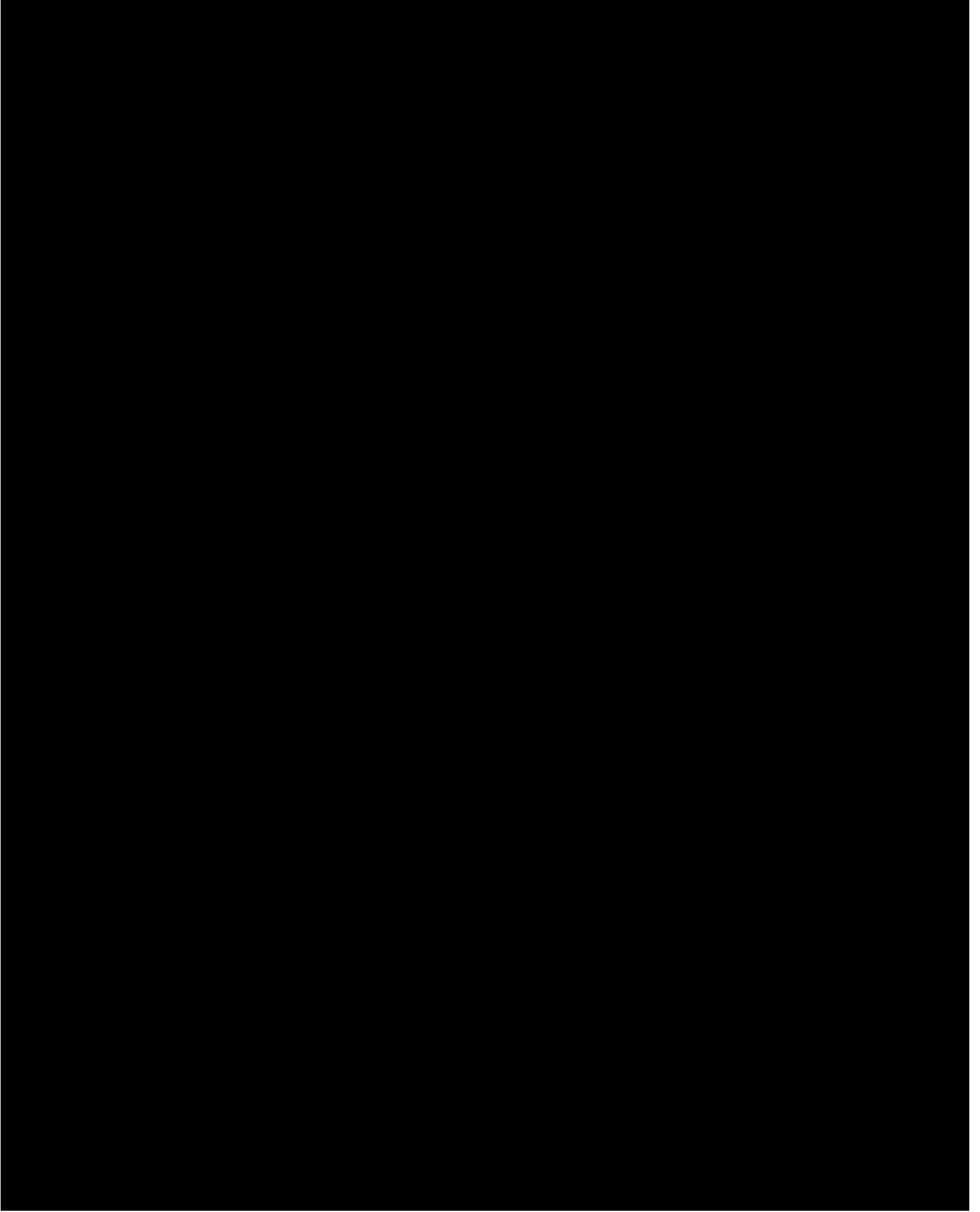
**CONFIDENTIAL Exhibit F**

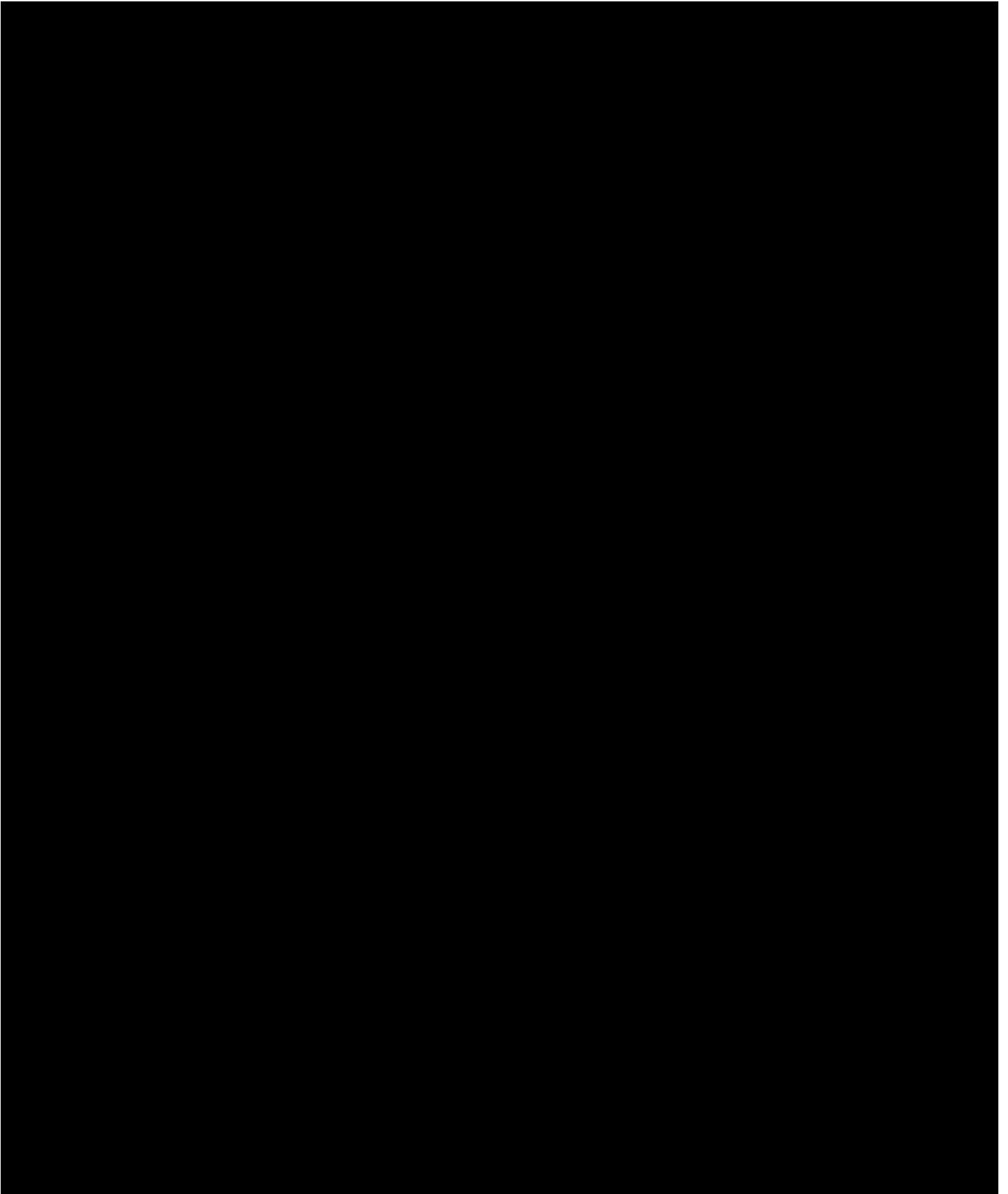
**LTS Telecommunications Services (USA) Inc. Financial Statements**

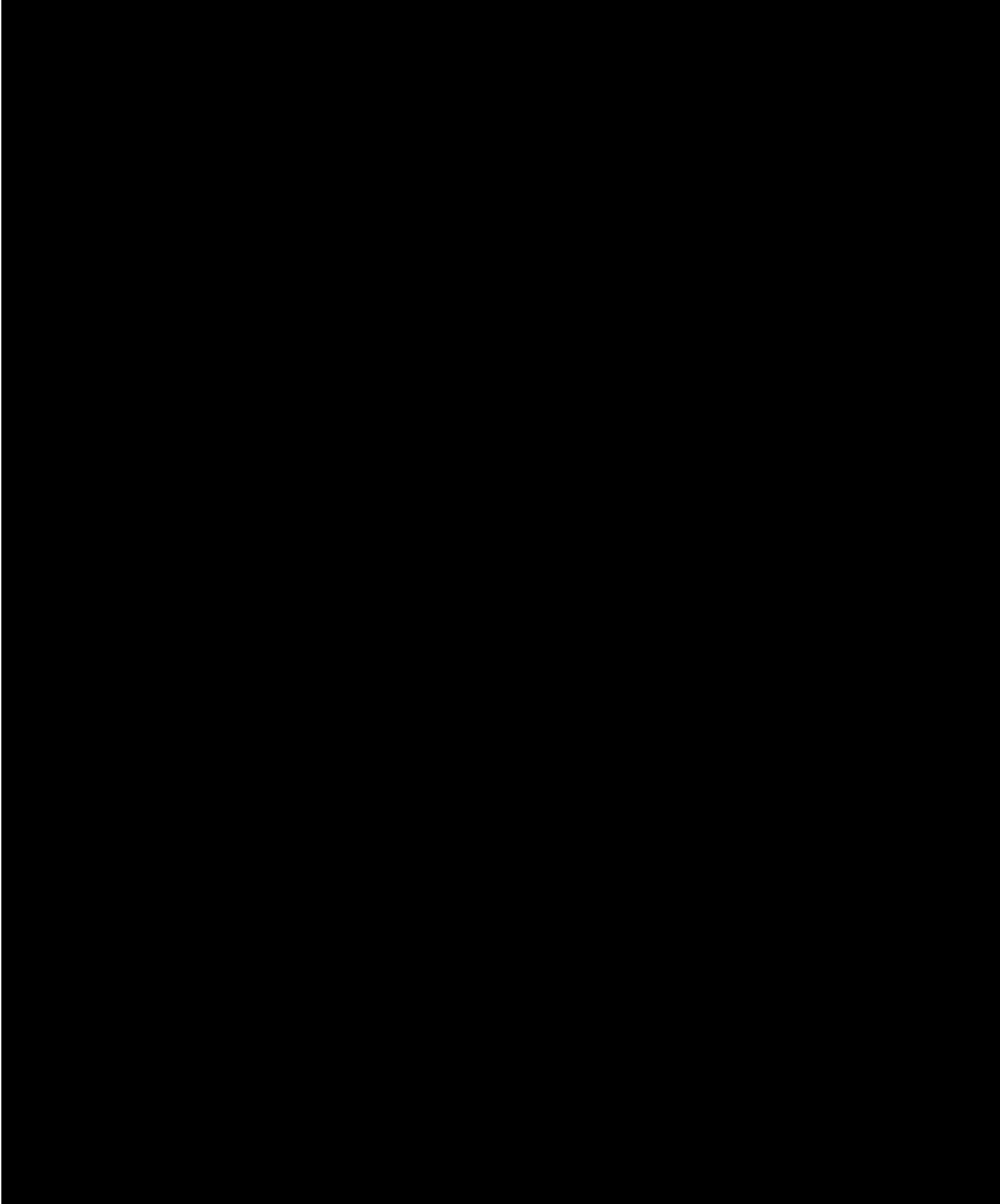
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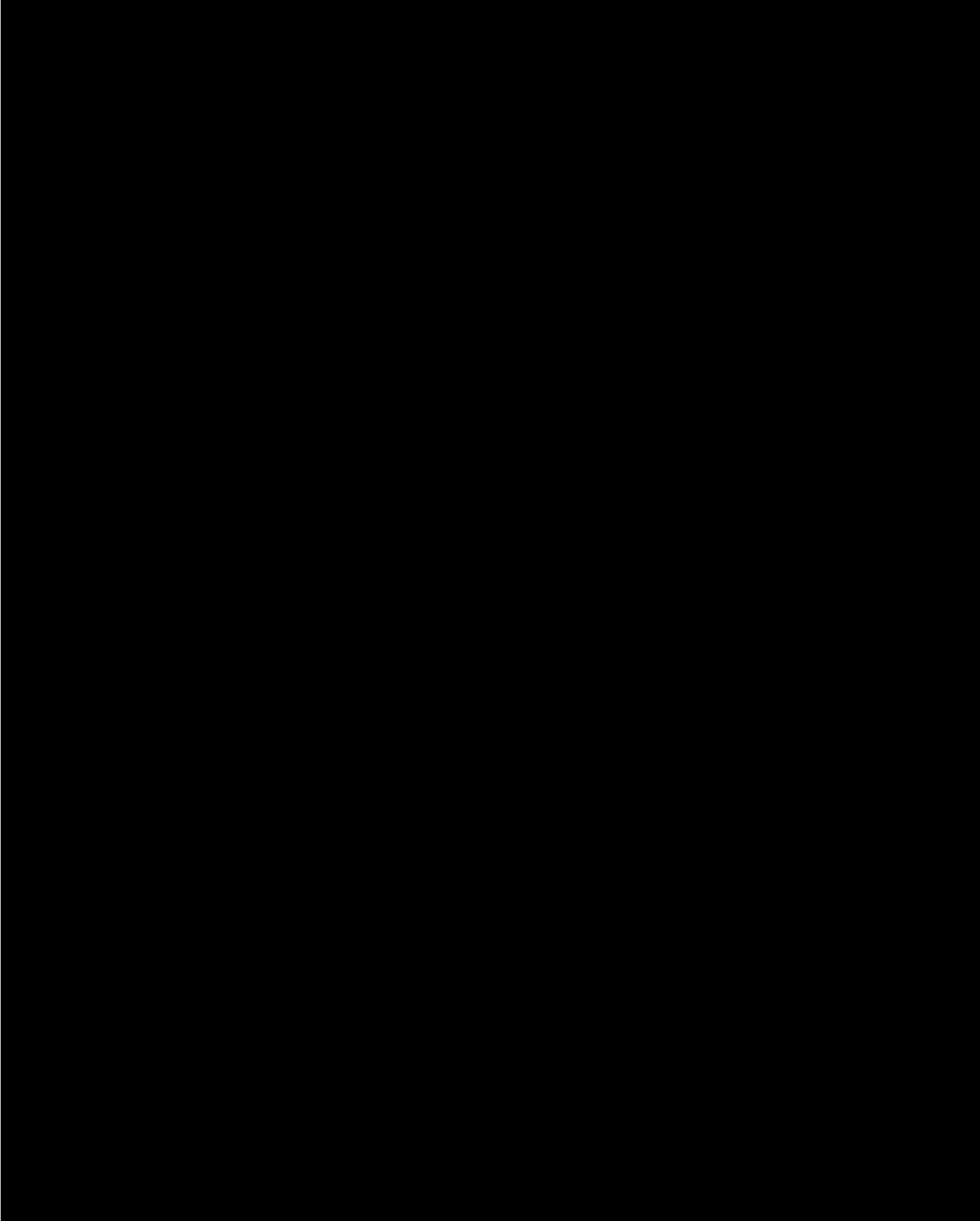


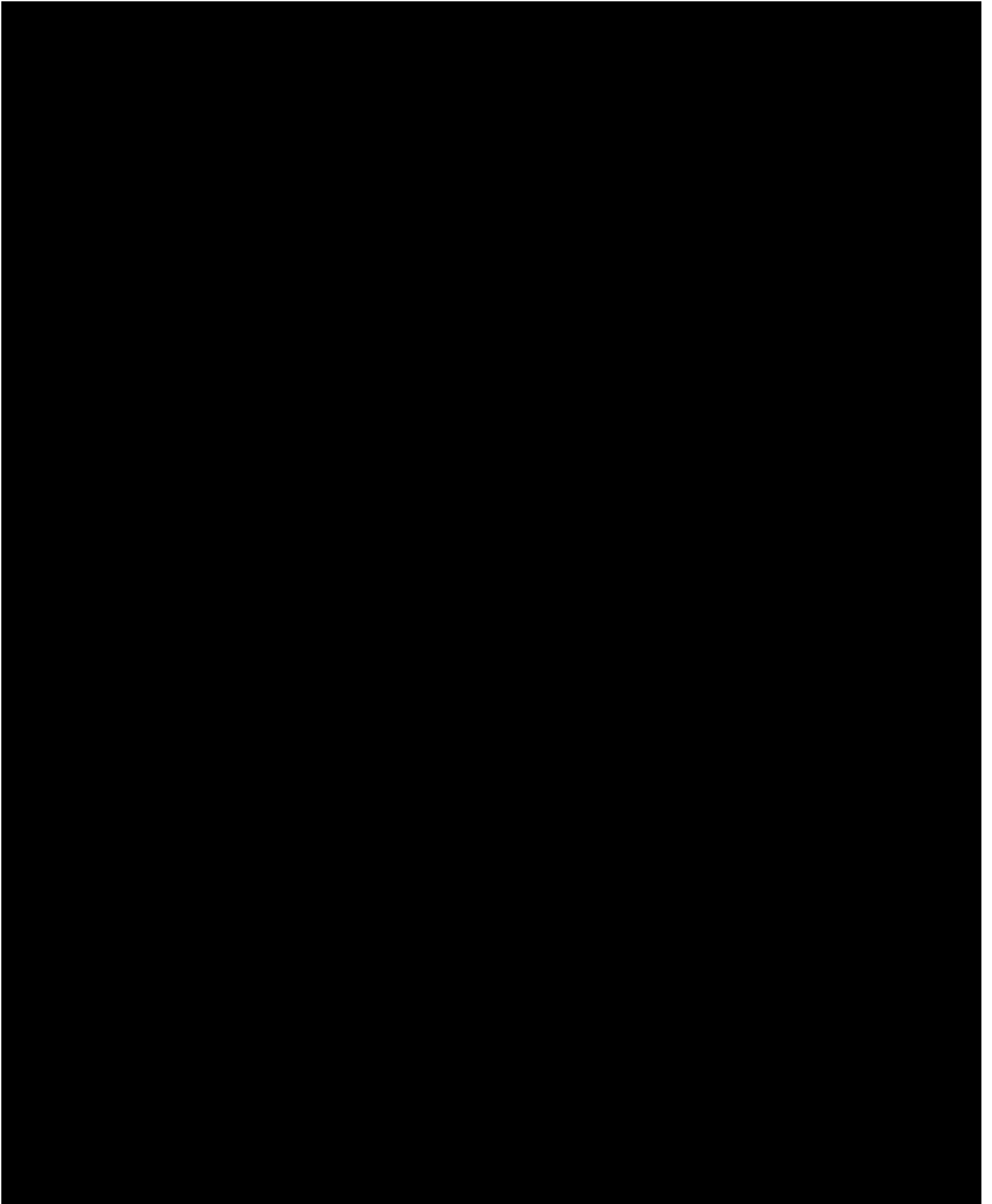


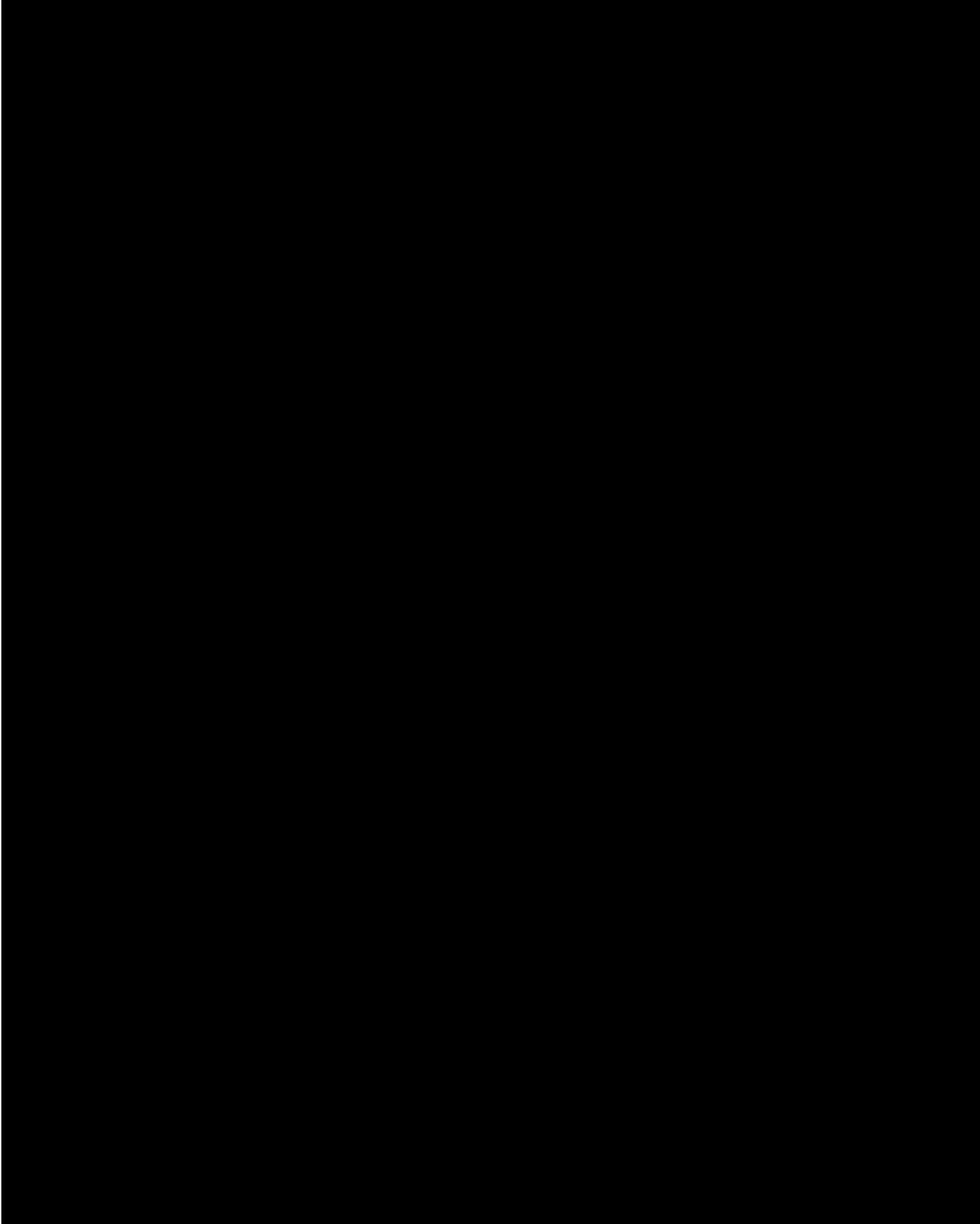




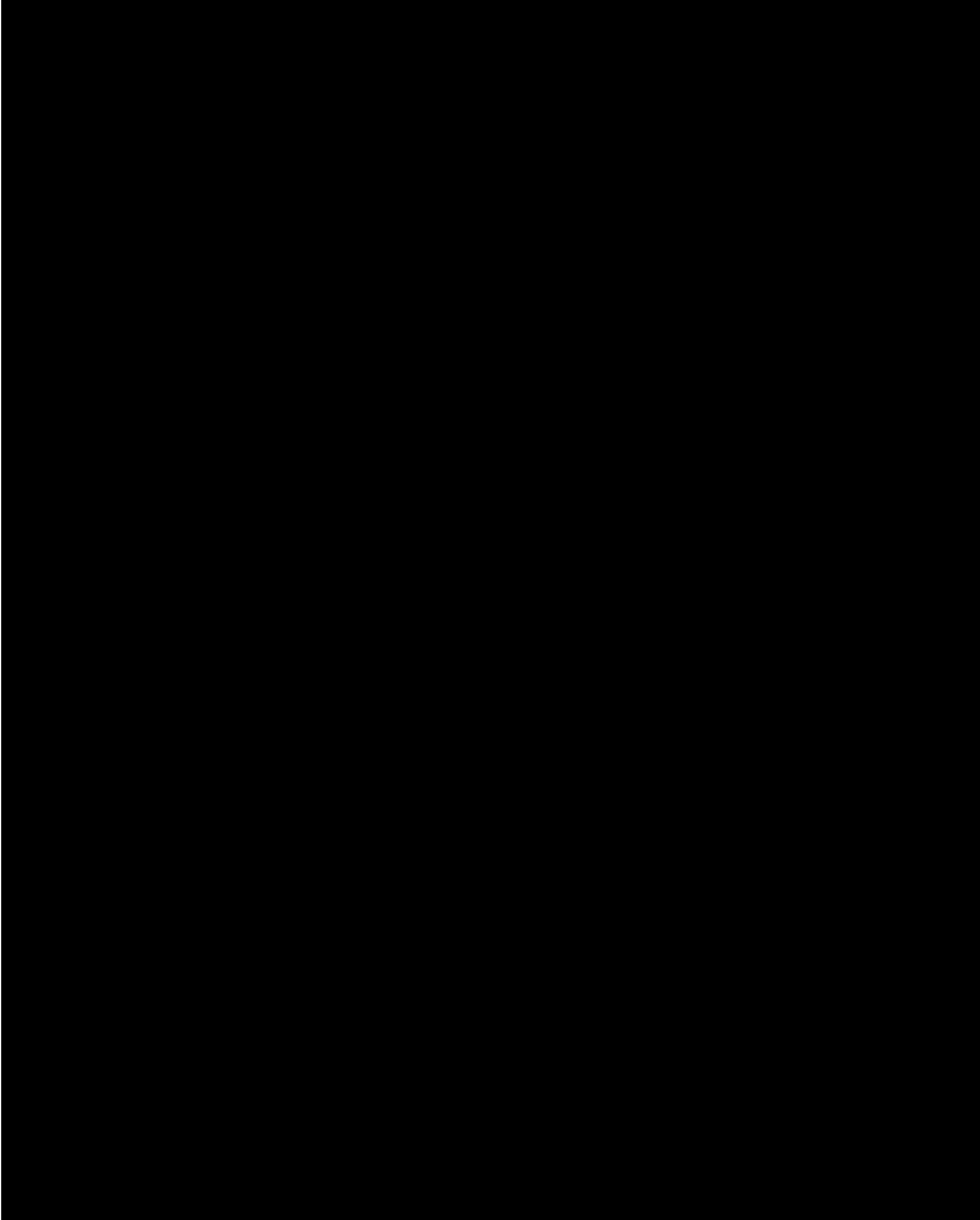












**Exhibit G**

**Surety Bond**

[Attached]

**TENNESSEE PUBLIC UTILITY COMMISSION**

**TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND**

Bond #: K42091510

**WHEREAS**, LTS Telecommunications Services (USA) Inc. (the "Principal"), has applied to the Tennessee Public Utility Commission for authority to provide telecommunications services in the State of Tennessee; and

**WHEREAS**, under the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated, as amended, the Principal is required to file this bond in order to obtain such authority and to secure the payment of any monetary sanction imposed in any enforcement proceeding brought under Title 65 of the Tennessee Code Annotated or the Consumer Telemarketing Act of 1990 by or on behalf of the Tennessee Public Utility Commission (the "TPUC"); and

**WHEREAS**, Federal Insurance Company (the "Surety"), a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, has agreed to issue this bond in order to permit the Principal to comply with the provisions of Title 65, Chapter 4, Section 125(j) of the Tennessee Code Annotated;

**NOW THEREFORE, BE IT KNOWN**, that we the Principal and the Surety are held and firmly bound to the STATE OF TENNESSEE, in accordance with the provisions of Tennessee Code Annotated, Title 65, Chapter 4, Section 125(j), in the full amount of twenty thousand dollars (\$20,000.00) lawful money of the United States of America to be used for the full and prompt payment of any monetary sanction imposed against the Principal, its representatives, successors or assigns, in any enforcement proceeding brought under Title 65 of Tennessee Code Annotated or the Consumer Telemarketing Act of 1990, by or on behalf of the TPUC, for which obligation we bind ourselves, our representatives, successors and assigns, each jointly and severally, firmly and unequivocally by these presents.

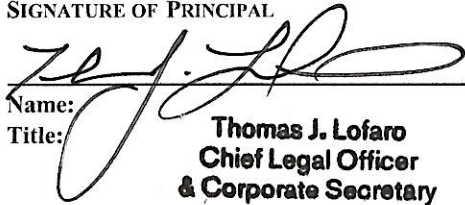
This bond shall become effective on the 22nd day of June, 2026, and shall be continuous; provided, however, that each annual renewal period or portion thereof shall constitute a new bond term. Regardless of the number of years this bond may remain in force, the liability of the Surety shall not be cumulative, and the aggregate liability of the Surety for any and all claims, suits or actions under this bond shall not exceed Twenty Thousand Dollars (\$20,000.00). The Surety may cancel this bond by giving thirty (30) days written notice of such cancellation to the TPUC and Principal by certified mail, it being understood that the Surety shall not be relieved of liability that may have accrued under this bond prior to the date of cancellation.

**PRINCIPAL**

LTS Telecommunications Services (USA) Inc.  
Name of Company authorized by the TPUC

\_\_\_\_\_  
Company ID # as assigned by TPUC

**SIGNATURE OF PRINCIPAL**

  
Name: \_\_\_\_\_  
Title: **Thomas J. Lofaro**  
**Chief Legal Officer**  
**& Corporate Secretary**

**SURETY**

Federal Insurance Company  
Name of Surety

202B Hall's Mill Road, Whitehouse Station, NJ 08889  
Address of Surety

**SIGNATURE OF SURETY AGENT**

  
Name: Tina McEwan  
Title: Attorney-In-Fact

**Address of Surety Agent:**  
5005 LBJ Freeway, #1400, Dallas, TX 75244

**THIS BOND IS ISSUED IN ACCORDANCE WITH THE PROVISIONS OF SECTION 125, CHAPTER 4, TITLE 65 OF THE TENNESSEE CODE ANNOTATED AS AMENDED BY CHAPTER NO. 586, 2000 PUBLIC ACTS. SHOULD THERE BE ANY CONFLICT WITH THE TERMS HEREOF AND THE STATUTE OR REGULATIONS PROMULGATED THEREUNDER, THE STATUTE OR REGULATIONS SHALL PREVAIL. (POWER OF ATTORNEY FROM AN APPROVED INSURANCE COMPANY MUST BE ATTACHED.)**

**ACKNOWLEDGMENT OF PRINCIPAL**

STATE OF TENNESSEE  
COUNTY OF \_\_\_\_\_

Before me, a Notary Public of the State and County aforesaid, personally appeared \_\_\_ with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of \_\_\_\_\_, and he acknowledged to me that he executed the same.

WITNESS my hand and seal this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

My Commission Expires:

\_\_\_\_\_, 20\_\_

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

**ACKNOWLEDGMENT OF SURETY**

STATE OF TENNESSEE  
COUNTY OF \_\_\_\_\_

Before me, a Notary Public of the State and County aforesaid, personally appeared \_\_\_\_\_ with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of \_\_\_\_\_, the within named Surety, a corporation licensed to do business in the State of Tennessee and duly authorized by the Tennessee Commissioner of Insurance to engage in the surety business in this state pursuant to Title 56, Chapter 2 of the Tennessee Code Annotated, and that he as such an individual being authorized to do so, executed the foregoing bond, by signing the name of the corporation by himself and as such individual.

WITNESS my hand and seal this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

My Commission Expires:

\_\_\_\_\_, 20\_\_

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

**APPROVAL AND INDORSEMENT**

This is to certify that I have examined the foregoing bond and found the same to be sufficient and in conformity to law, that the sureties on the same are good and worth the penalty thereof, and that the same has been filed with the Tennessee Public Utility Commission, State of Tennessee, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Name:  
Title:

# ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of San Diego

On June 22, 2020 before me, Luisa Fonseca, Notary Public  
(insert name and title of the officer)

personally appeared Thomas James Lofaro,  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are  
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in  
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the  
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

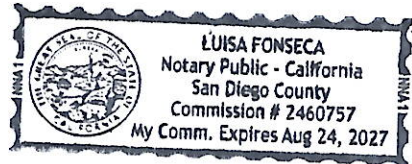
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing  
paragraph is true and correct.

WITNESS my hand and official seal.

Signature



(Seal)



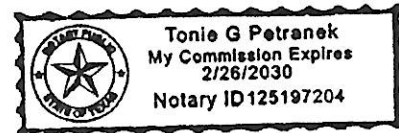
State of Texas

County of Dallas

On June 16th 2026 before me, Tonie G. Petranek, Notary Public, personally appeared Tina McEwan who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity upon behalf of which the person acted, executed this instrument.

WITNESS, my hand and seal on this 16<sup>th</sup> day of June, 2026.

Signature Tonie G. Petranek  
Signature of Notary Public Tonie G. Petranek



## Exhibit H

### **Small and Minority-Owned Telecommunications Business Participation Plan**

Pursuant to T.C.A. § 65-5-112, as amended, LTS Telecommunications Services (USA) Inc. (“LTS”) submits this small and minority-owned telecommunications business participation plan (the “Plan”) along with its Application for a Certificate of Public Convenience and Necessity to provide competing intrastate and local exchange services in Tennessee.

#### **I. PURPOSE**

The purpose of § 65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to telecommunications service providers. LTS is committed to the goals of § 65-5-112 and to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. LTS 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, LTS will endeavor to make opportunities available to minority-owned and small businesses via one or more resources including but not limited to those resources listed in Section III.

#### **II. DEFINITIONS**

As defined in § 65-5-112:

*Minority-Owned Business.* Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls the 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**

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

Gale Williams  
Director, Business Operations, US Infrastructure  
LTS Telecommunications Services (USA) Inc.  
500 Meijer Way., Suite 200  
Florence, Kentucky, 41042  
Phone: (859) 286-8114  
Email: Gale.williams@ledcor.com

LTS 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 Utility Commission.
- 2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.
- 3) Preparing and submitting such forms as may be required by the Tennessee Public Utility Commission, including the filing of required annual updates.
- 4) Serving as the primary liaison to and cooperate with the Tennessee Public Utility Commission, other agencies of the State of Tennessee, and 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 Regulatory Authority.
- 7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.
- 8) Providing information and educational activities to persons within LTS and training such persons to seek out, encourage, and promote the use of small and minority-owned businesses.

In performance of these duties, the Administrator will utilize a number of resources, which may include:

Chambers of Commerce  
The Tennessee Department of Economic and Community Development  
The United States Department of Commerce  
Small Business Administration  
Office of Minority Business  
The National Minority Supplier Development Counsel  
The National Association of Women Business Owners  
The National Association of Minority Contractors  
Historically Black Colleges, Universities, and Minority Institutions

The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and

feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

#### IV. RECORDS AND COMPLIANCE REPORTS

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

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

Date: Jun 23, 2026

By: Gale Williams  
Gale Williams  
Director, Business Operations, US  
Infrastructure

**Exhibit I**

**Notice of Application and Certificate of Service**

[Attached]

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**IN THE MATTER OF THE APPLICATION  
OF LTS TELECOMMUNICATIONS  
SERVICES (USA) INC. FOR A  
CERTIFICATE TO PROVIDE COMPETING  
LOCAL AND INTEREXCHANGE  
TELECOMMUNICATION 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 Service, you are hereby given notice that on June, 29, 2026, LTS Telecommunications Services (USA) Inc. filed an Application for a Certificate of Convenience and Necessity to provide competing local exchange and interexchange telecommunication services in the State of Tennessee.

This 29th day of June, 2026.

Respectfully Submitted,

/s/ Noah J. Mason  
Noah J. Mason  
Tennessee Bar No. 034341  
Troutman Pepper Locke, LLP  
600 Peachtree Street NE, Suite 3000  
Atlanta, Georgia 30308  
Phone: (404) 870-4648  
Email: [Noah.Mason@troutman.com](mailto:Noah.Mason@troutman.com)

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**IN THE MATTER OF THE APPLICATION  
OF LTS TELECOMMUNICATIONS  
SERVICES (USA) INC. FOR A  
CERTIFICATE TO PROVIDE COMPETING  
LOCAL AND INTEREXCHANGE  
TELECOMMUNICATION SERVICES**

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

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the Notice of Filing of the Application of LTS Telecommunications Services (USA) Inc. for a Certificate of Convenience and Necessity to Provide Competing Local and Interexchange Telecommunication Services was served on the following parties of record by depositing a copy of same in the United States Mail, First Class, Postage Prepaid, to their last known address as follows:

Ardmore Telephone Company, Inc.  
P.O. Box 549  
517 Ardmore Avenue  
Ardmore, TN 38449

Brightspeed of Southern Tennessee, LLC  
P.O. Box 1330  
Fayetteville, NC 28302

BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2106  
Nashville, TN 37201-3300

Brightspeed of Western Tennessee, LLC  
P.O. Box 1330  
Fayetteville, NC 28302

Brightspeed of Appalachia, LLC  
P.O. Box 1330  
Fayetteville, NC 28302

Crockett Telephone Company  
P.O. Box 24207  
Friendship, TN 38034

Brightspeed of East Tennessee, LLC  
P.O. Box 1330  
Fayetteville, NC 28302

Frontier Communications of Tennessee  
300 Bland Street  
Bluefield, WV 24701

Humphreys County Telephone Company  
525 Junction Road  
Madison, WI 53717

Tellico Telephone Company  
P.O. Box 9  
102 Spence Street  
New Johnsonville, TN 37385-0009

Loretto Telephone Company, Inc.  
P.O. Box 130  
Loretto, TN 28469

United Telephone Company  
P.O. Box 38  
120 Taylor Street  
Chapel Hill, TN 37034

Millington Telephone Company, Inc.  
4880 Navy Road  
Millington, TN 38083

West Tennessee Telephone Company, Inc.  
P.O. Box 10  
244 E. Main Street  
Bradford, TN 38316

Peoples Telephone Company  
P.O. Box 24207  
Jackson, MS 39225

This 29th day of June, 2026.

Respectfully Submitted,

/s/ Noah J. Mason  
Noah J. Mason  
Tennessee Bar No. 034341  
Troutman Pepper Locke, LLP  
600 Peachtree Street NE, Suite 3000  
Atlanta, Georgia 30308  
Phone: (404) 870-4648  
Email: [Noah.Mason@troutman.com](mailto:Noah.Mason@troutman.com)

## Exhibit J

### Numbering Issues

Below are Applicant's responses to the questions by the Tennessee Public Utility Commission concerning numbering.

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 K

### Tennessee Specific Operational Issues

Below are Applicant's responses to the questions by the Tennessee Public Utility Commission concerning Tennessee Specific Operational Issues.

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

**Not applicable. Applicant 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 Applicant is aware of these requirements, Applicant 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, Applicant is aware of the ILEC local 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. Applicant 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.

**Bernard Matthews, Director of Field Operations**

**6405 Mira Mesa Blvd., Suite 200**

**San Diego, CA 32121**

**Phone: (877) 859-1155**

**Email: Bernard.Matthews@ledcor.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 T.C.A. § 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 applicable in the future.**

**Exhibit L**

**Pre-Sworn Testimony of Michael Murray**

[Attached]

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION**

**IN THE MATTER OF THE APPLICATION  
OF LTS TELECOMMUNICATIONS  
SERVICES (USA) INC. FOR A  
CERTIFICATE TO PROVIDE COMPETING  
LOCAL TELECOMMUNICATION  
SERVICES**

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

**PRE-FILED TESTIMONY OF MICHAEL MURRAY**

I, Michael Murray, do hereby testify as follows in support of the application of LTS Telecommunications Services (USA) Inc. (“LTS” or “Applicant”) 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 Michael Murray. My business address is 6405 Mira Mesa Blvd., Suite 200, San Diego, California 92121. I am Senior Vice President of Operations and US Infrastructure at LTS.

**Q: Please briefly describe your duties.**

A: I serve as Senior Vice President of Operations and US Infrastructure. At LTS, I am responsible for the execution of all Outside Plant telecommunications projects in the U.S. I also lead LTS’s Innovation committee, leading the division’s efforts to implement new technologies and processes.

**Q: Please describe your business experience and educational background.**

A: I have more than thirty years of experience in Project and Program management in highly technical and complex industries. I have both a Master of Business Administration from the University of Central Florida in 1993 and a Bachelor of Science of Mechanical Engineering degree

from Bradley in 1987. I joined Leducor in 2015 as Vice President and recently completed a private, 2400-mile Design Build fiber network, LTS's largest single project to date.

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

A: Yes.

**Q: Please describe the current corporate structure of Applicant.**

A: LTS is independently owned by 13107 Delaware LLC. Further information on the corporate structure can be found in Exhibit A.

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

A: Yes, LTS has the requisite managerial, technical, and financial qualifications necessary to provide the proposed services in Tennessee, as evidenced in Exhibit E of the Application.

**Q: Please describe LTS's financial qualifications.**

A: LTS has sufficient financial resources to initiate and maintain the services and related operations in Tennessee as proposed in this Application. Further financial information to demonstrate the financial resources available is provided as CONFIDENTIAL Exhibit F.

**Q: Please describe LTS's managerial and technical qualifications.**

A: LTS has the managerial qualifications necessary to provide the proposed services in Tennessee, as LTS is managed by a well-qualified and highly skilled team with substantial expertise and experience in the telecommunications industry. The biographies included with the Application as Exhibit E demonstrate that LTS possesses the managerial and technical qualifications necessary to operate as a competing local telecommunications company in Tennessee, consistent with the TPUC's requirement.

**Q: What services will LTS offer?**

A: Applicant seeks authority to offer resold and facilities-based local exchange and interexchange telecommunications services, including point-to-point high-capacity services (*i.e.*, private line, Ethernet, and Wavelength). Applicant's business is primarily focused on serving large enterprise customers at competitive rates through individual case basis contracts. Applicant requests authority to offer non-switched local exchange and interexchange services (non-voice) statewide. Applicant intends to construct its own fiber-optic facilities and anticipates providing key route and service maintenance on all of its constructed fiber facilities.

**Q: Will LTS offer service to all customers within its service area?**

A: LTS does not intend to provide retail switched voice service, including dial tone to end-use customers in Tennessee. LTS will construct its own fiber-optic facilities and anticipates offering services to its wholesale large enterprise customers within its service area.

**Q: Does LTS plan to offer local exchange telecommunication services in areas served by an incumbent local exchange telephone company with fewer than 100,000 total access lines?**

A: Applicant seeks authority to offer resold and facilities-based local exchange and interexchange telecommunications services, including point-to-point high-capacity services throughout the State of Tennessee. The services proposed by LTS may include enterprise customers and providers that are located in areas served by an incumbent local exchange company with fewer than 100,000 total access lines. However, LTS does not have plans to provide retail switched voice services, including dial tone.

**Q: Will the granting of a certificate of convenience and necessity to LTS 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 service providers to operate more efficiently, resulting in reduced prices for customers. LTS's participation in the Tennessee market 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 LTS intend to comply with all TPUC rules, statutes, and orders pertaining to the provision of telecommunication services in Tennessee, including those for disconnection and reconnection service?**

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

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

A: No, neither LTS 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 LTS or one of its affiliates?**

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

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

A: No. Neither Applicant nor its affiliates have been the subject of any investigations nor sanctioned by any regulatory authority for service or billing irregularities.

**Q: Who is knowledgeable about LTS's operations and will serve as its Regulatory and Customer Service Contact?**

A: Bernard Mathews will serve as Applicant's Customer Service Contact. He can be reached by emailing Bernard.Mathews@ledcor.com, or by calling 877-859-1155. Gale Williams will serve as Applicant's Regulatory Contact. She can be reached by emailing Gale.Williams@ledcor.com, or by calling 859-286-8114.

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

A: LTS has a dedicated internal team and legal counsel that will respond in a timely manner to information requests from TPUC and staff. LTS's team will work closely with TPUC and its staff to ensure all information requests are thoroughly and promptly addressed.

**Q: Does this conclude your testimony?**

A: Yes.

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

*Michael Murray*

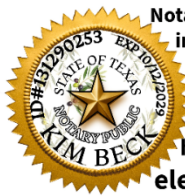
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Michael Murray  
Senior Vice President of Operations and US Infrastructure  
LTS Telecommunications Services (USA) Inc.

Respectfully submitted this 24th day of June, 2026.

State of Texas  
County of Tarrant

SWORN AND SUBSCRIBED before me by Michael Murray, as Senior Vice President of Operations and US Infrastructure of LTS Telecommunications Services (USA) Inc. on this 24th day of June 2026.



**Notarized Online using  
interactive two-way  
audio and visual  
communication.  
Signatures notarized  
have been signed  
electronically.**

An electronic signature in blue ink, appearing to be "Kim Beck". To the right of the signature is a logo for "Notary Now" with a red circular icon containing a white "N". Below the signature and logo, the text "Electronic Signature of Kim Beck, Texas Notary" is printed.

STATE OF TEXAS )  
 )  
COUNTY OF TARRANT )

**VERIFICATION**

I, Michael Murray, state that I am Senior Vice President of Operations and US Infrastructure of LTS Telecommunications Services (USA) Inc. (“Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

*Michael Murray*

\_\_\_\_\_  
Michael Murray  
Senior Vice President of Operations and US  
Infrastructure  
LTS Telecommunications Services (USA) Inc.

Sworn and subscribed before me this 24th day of June 2026 by Michael Murray.

