

Henry M. Walker

Partner
hwalker@bradley.com
615.252.2363 direct



July 2, 2026

Electronically Filed in TPUC Docket
Room on July 2, 2026 at 3:11 p.m.

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

Docket No. 26 - 00056

Re: Application of Vero Networks ABS, 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 Vero Networks ABS, LLC for a Certificate of
Convenience and Necessity to offer competitive telecommunications services in Tennessee.
Exhibits F-1, F-2 and F-3 are included in the confidential 2025 Audit Financial Statements and
filed under separate cover.

Enclosed is a check for the filing fee.

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

Sincerely

BRADLEY ARANT BOULT CUMMINGS LLP

By: 
Henry Walker

HW/cc

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

In the Matter of the Application of	)	
	)	
Vero Networks ABS, LLC	)	
	)	
for a Certificate of Convenience and	)	Docket No. <u>26-00056</u>
Necessity to Provide Competing Local	)	
Exchange Telecommunications Services	)	
in the State of Tennessee	)	
	)	

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

Pursuant to applicable Tennessee statutes and the Rules and Regulations of the Tennessee Public Utility Commission (“Commission”) and Section 253 of the Federal Telecommunications Act of 1996 (“Telecommunications Act of 1996”), Vero Networks ABS, LLC (the “Company” or “Applicant”), by and through its counsel, respectfully requests that the Commission grant Applicant authority to provide competing local exchange telecommunications services throughout the State of Tennessee. Applicant is willing and able to adhere to all applicable Commission policies, rules, and orders pertaining to the provision of competing local exchange telecommunications services, as specified in TCA § 65-4-201.

The State of Tennessee has adopted a policy of allowing competition in the local and long-distance telecommunications markets, recognizing that it is in the public interest to develop effective competition to ensure that all consumers will have access to high quality, low cost, and innovative telecommunications services. The Telecommunications Act of 1996 also seeks to promote competition and reduce regulation in order to secure lower prices and higher quality

telecommunications services for American consumers. Both goals will be promoted by granting this Application.

This Application is filed in connection with certain restructuring and financing arrangements in which Applicant's indirect parent, Vero Fiber Networks, LLC ("Vero Fiber"), is expected to assign to Applicant certain assets including communications optical fiber, customer contracts, rights in third party fibers, and associated telecommunications equipment used to provision services or facilities to the affected customers (the "*Pro Forma* Asset Transfer").¹ A separate filing will be submitted to the Commission regarding the *Pro Forma* Asset Transfer.

In support of its Application, Applicant submits the following information:

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

Vero Networks ABS, LLC ("Applicant" or the "Company")
3575 Ringsby Court, Suite #320
Denver, CO 80216
Tel: (800) 691-8376
www.verofiber.com

Questions regarding this application should be directed to:

Henry Walker
Bradley Arant Boult Cummings LLP
1221 Broadway, Suite 2400
Nashville, TN 37203
Tel: 615-252-2363
hwalker@bradley.com

with a copy to:

Danielle Burt
Case Smith
Morgan Lewis & Bockius LLP

¹ Applicant understands that Commission approval is not required for the *Pro Forma* Asset Transfer as Vero Fiber has elected market regulation. See *Application of Vero Fiber Networks, LLC for a Certificate of Public Convenience and Necessity to Provide Competing Local Exchange Telecommunications Services in the State of Tennessee*, Order, Docket No. 18-00008 (May 3, 2018). Additionally, Applicant's affiliate Vero Fiber ABS, LLC ("Vero Fiber ABS") has or will file an application seeking authority to provide competing local exchange and interexchange telecommunications services throughout the State of Tennessee, which is necessary in order to undertake certain restructuring and financing arrangements.

1111 Pennsylvania Ave., N.W.
Washington, DC 20004-2541
Tel: 202-739-3000
Fax: 202-739-3001
danielle.burt@morganlewis.com
case.smith@morganlewis.com

and

Gregg Strumberger
Chief Legal Officer
1580 N Logan St. - Ste 660 - PMB 613180
Denver, CO 80203-1994
Tel: 303-350-4060
gstrumberger@veronetworks.com

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

Attached as **Exhibit A** is an organizational chart of Applicant's corporate structure. Applicant's principal place of business is located at 3575 Ringsby Court, Suite #320, Denver, CO 80216. Applicant is directly, wholly owned by Vero Funding, LLC, a Delaware limited liability company. Vero Funding, LLC is directly, wholly owned by Vero Guarantor, LLC, a Delaware limited liability company. Vero Funding, LLC and Vero Guarantor, LLC have the same principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216. Vero Guarantor, LLC is directly, wholly owned by Vero ABS Parent, LLC, a Colorado limited liability company with its principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216. Vero ABS Parent, LLC is jointly owned by Vero Fiber, a Colorado limited liability company with its principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216, and Vero Broadband, LLC ("Vero Broadband"), a Colorado limited liability company with its principal place of business at 740 US-24, Woodland Park, CO 80863. Vero Fiber is directly, wholly owned, and Vero Broadband is indirectly wholly owned by VFN Holdings, Inc. ("VFN Holdings"), a Delaware corporation, with its principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216

3. **Corporate Information**

Applicant is a Delaware limited liability company formed on June 9, 2026. Applicant provides a copy of its formation documents as **Exhibit B** and its Certificate of Authority to transact business in the State of Tennessee as **Exhibit C**.

Key management and officers are provided as **Exhibit D**. There are no officers located within Tennessee. All officers may be reached at Applicant's principal place of business.

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

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

A. **Managerial Qualifications**

Applicant has the managerial and technical qualifications necessary to provide the proposed services in the State of Tennessee. Applicant is managed by a highly skilled team with substantial expertise and experience. Biographies of key management personnel of Applicant, who are responsible for the Applicant's operations, are attached as **Exhibit E**. These biographies 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, Applicant 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**

Applicant will satisfy the minimum standards established by the Commission. To the extent required, Applicant 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. Applicant will not require customers to purchase CPE that cannot be used with the incumbent local exchange carrier's systems. As noted in the biographies provided in **Exhibit E**, Applicant's operations will be overseen by a well-qualified management team with substantial telecommunications experience and technical expertise.

Applicant, as a newly-formed company, is not currently authorized to provide telecommunications services in any state. In addition to Tennessee, Applicant intends to seek authorization to provide, or has applications pending for, intrastate telecommunications services in Arkansas, Colorado, Florida, Illinois, Indiana, Iowa, Missouri, Montana, New Mexico, North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, and Texas.

Applicant's affiliates are authorized to provide intrastate telecommunications in Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Hawaii, Iowa, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Carolina, New Mexico, Nevada, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, Washington, West Virginia, and Wisconsin.

In Tennessee, Applicant's affiliates Vero Fiber, TEC of Jackson, Inc. ("TEC of Jackson"), Crockett Telephone Co., Inc. ("Crockett Telephone"), Peoples Telephone Company ("Peoples Telephone"), and West Tennessee Telephone Co., Inc. ("West Tennessee Telephone") are authorized to provide intrastate telecommunications services. Vero Fiber is authorized as a competitive local exchange carrier by authority granted in Docket No. 18-00008 on May 3, 2018. TEC of Jackson is authorized to provide competitive intrastate telecommunications. Crockett Telephone, Peoples Telephone, and West Tennessee Telephone are authorized as Incumbent Local Exchange Carriers and are designated as Eligible Telecommunications Carriers ("ETC").²

Neither Applicant nor any of its affiliates has been denied requested certification in any jurisdiction, nor has any permit, license, or certificate been permanently revoked by any authority.

C. Financial Qualifications and Surety Bond

Applicant possesses the requisite financial resources to provide telecommunications services in the State of Tennessee. Applicant, as a newly-formed company, does not have historical financial statements. To demonstrate Applicant's financial qualification to operate in Tennessee, Applicant provides audited financial statements of its parent VFN Holdings (balance sheet, income statement, and cash flow statement) as **Confidential EXHIBITS F-1, F-2, and F-3**. Because Applicant is a privately held company, Applicant requests that the financial statements appended hereto as **CONFIDENTIAL EXHIBITS F-1, F-2, and F-3** be treated as Confidential. The Confidential exhibits are marked "CONFIDENTIAL" and are being filed as a separate document, and Applicant requests that they not be made part of the public record

Applicant attaches as **Exhibit F-4** a surety bond in the amount of twenty thousand dollars (\$20,000).

5. Proposed Service Area and Description of Services

Applicant seeks authority to provide competitive local exchange telecommunications services throughout the State of Tennessee. Applicant is seeking a Certificate in Tennessee in order to provide services currently provided by its indirect parent Vero Fiber. As noted in Section 1 above, a separate filing concerning the *Pro Forma* Asset Transfer will be submitted.

Applicant's primary business is to provide essential telecommunications and broadband infrastructure to underserved schools and libraries, both directly and through wholesale

² See *Crockett Telephone Company, Inc.'s Notification of Intent to Operate Pursuant to Market Regulation*, Docket No. 12-00133 (Nov. 5, 2012); *Peoples Telephone Company's Notification of Intent to Operate Pursuant to Market Regulation*, Docket No. 12-00132 (Nov. 5, 2012); *TEC of Jackson, Inc.'s Notification of Intent to Operate Pursuant to Market Regulation*, Docket No. 25-00092 (Dec. 9, 2025); *West Tennessee Telephone Company, Inc.'s Notification of Intent to Operate Pursuant to Market Regulation*, Docket No. 12-00131 (Nov. 5, 2012).

arrangements, by connecting those schools and libraries with reliable, scalable, and secure connectivity. Applicant intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs. Applicant also intends to provide telecommunications and broadband infrastructure services to other educational, healthcare, government, banking, telecommunications and business customers throughout the state. Applicant will primarily provide services using its own facilities, including those assigned from Vero Fiber, and facilities leased from other carriers, but also seeks authority to provide services on a resold basis.

Applicant does not have plans to deploy specific facilities in Tennessee at this time.

6. Types of Telecommunications Service To Be Provided

As noted in paragraph 5, Applicant will primarily provide facilities-based competing local exchange and interexchange telecommunications services. 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

Applicant 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 by calling Applicant's toll-free phone number at (800) 691-8376. Written communication may be sent to:

Vero Networks ABS, LLC
1580 N Logan St. - Ste 660 - PMB 613180
Denver, CO 80203-1994

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, which will also lend to the specificity of their unique business. The contact person responsible for and knowledgeable about the Applicant's ongoing operations in Tennessee is Chris Pietila, General Counsel, 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 G** 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. Applicant does not intend to provide voice services at this time.

10. Notice Requirements

Applicant has served notice of this Application to the fifteen (15) incumbent local exchange telephone companies with a statement regarding the Company's intention to operate throughout the State of Tennessee. Attached as **Exhibit H** is the Notice and a Certificate of Service confirming compliance.

11. Numbering Issues

Please see the statement provided in **Exhibit I**.

12. Tennessee Specific Operational Issues

Please see the statement provided in **Exhibit J**.

13. Miscellaneous and Supporting Documentation

- A. Attached as **Exhibit K** is the sworn pre-filed testimony of Chris Pietila, General Counsel of Vero Networks ABS, LLC, 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 Applicant files with the Commission.
- D. As of the filing of this Application, except for that identified below, neither Applicant nor its affiliates have been the subject of any complaints for the provision of telecommunications services in any of the states within which Applicant and its affiliates are certified and currently providing service.

In March 2024, the Federal Communications Commission issued a Notice of Apparent Liability for Forfeiture finding that Vero Broadband acquired the assets, including Section 214 authorizations and wireless licenses, of certain entities that were in bankruptcy without prior approval. In re Vero Broadband, LLC, Notice of Apparent Liability for Forfeiture, File No. EB-IHD-22-00033591 (rel. Mar. 22, 2024). The FCC imposed a forfeiture of \$48,000.00 for the violation, which Vero Broadband timely paid.

In conclusion, this Application demonstrates that Applicant possesses the technical, financial and managerial resources to provide competitive local exchange telecommunications service in the State of Tennessee. Furthermore, granting this Application will promote the public interest by increasing the level of competition in the State of Tennessee telecommunications market. Ultimately, competition will compel all 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.

Wherefore, Applicant respectfully requests that the Commission grant a Certificate of Convenience and Necessity to provide competitive telecommunications service throughout the State of Tennessee. For the reasons stated above, Applicant'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.

Respectfully submitted,



Henry Walker
Bradley Arant Boult Cummings LLP
1221 Broadway, Suite 2400
Nashville, TN 37203
Tel: 615-252-2363
hwalker@bradley.com
Counsel for Vero Networks ABS, LLC

Dated: July 2, 2026

LIST OF EXHIBITS

EXHIBIT A – Organizational Chart

EXHIBIT B – Formation Documents

EXHIBIT C – Authority to Transact Business

EXHIBIT D – Key Management and Officers

EXHIBIT E – Key Management Biographies

CONFIDENTIAL EXHIBIT F-1 – Balance Sheet

CONFIDENTIAL EXHIBIT F-2 – Income Statement

CONFIDENTIAL EXHIBIT F-1 – Cash Flow Statement

EXHIBIT F-4 – Evidence of Surety Bond

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

EXHIBIT H – Notice of Application & Certificate of Service

EXHIBIT I – Numbering Issues

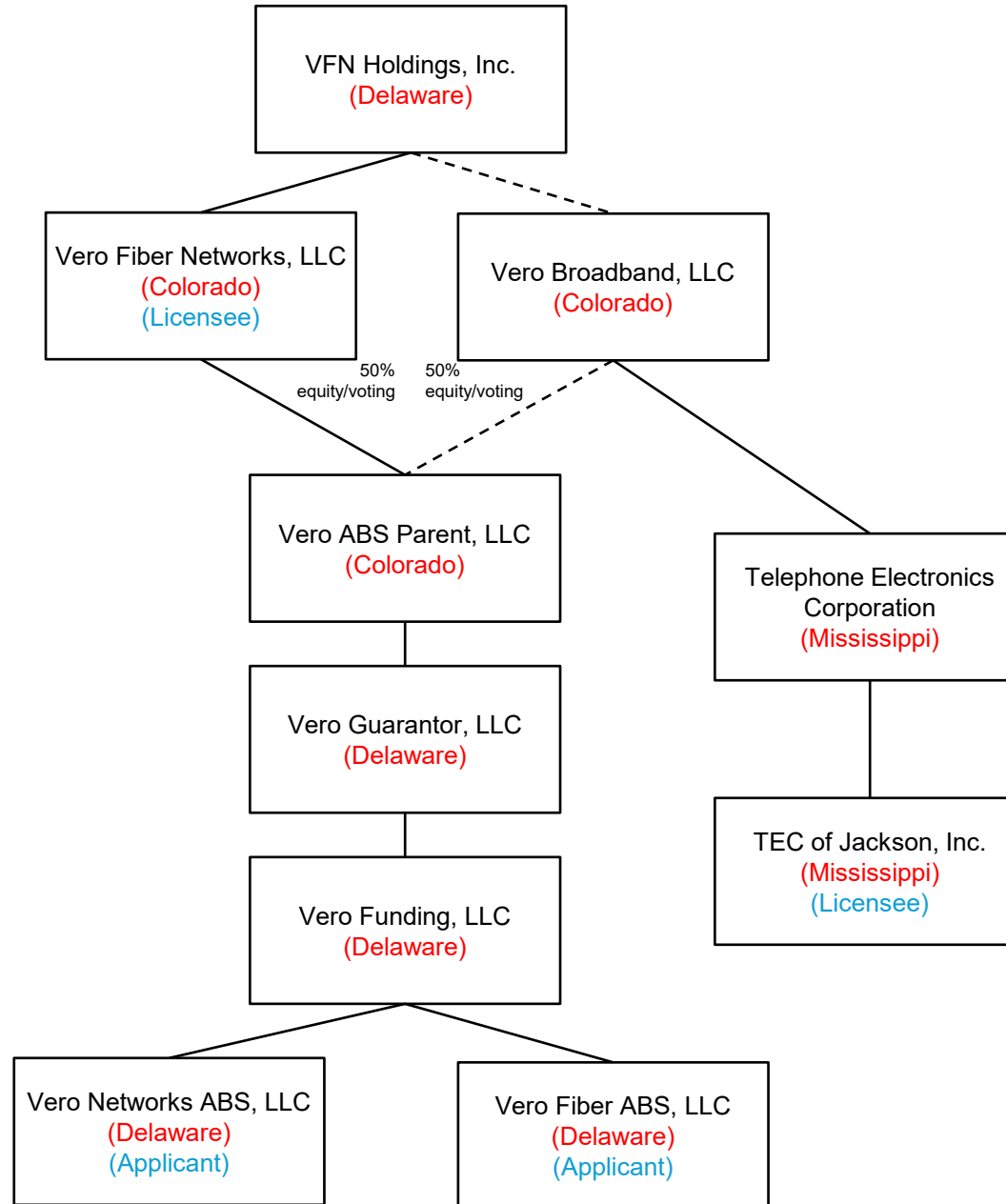
EXHIBIT J – Tennessee Specific Operational Issues

EXHIBIT K – Sworn Pre-filed Testimony

EXHIBIT A

Organizational Chart

Organizational Chart



Depiction shows Applicant's corporate ownership and Applicant's CLEC affiliates operating in the state (i.e., Licensee) and its corporate ownership.

All rights are voting and equity and 100% unless noted otherwise.

- - - = Indirect interest

EXHIBIT B

Formation Documents

Delaware

The First State

Page 1

*I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE
STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND
CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "VERO NETWORKS
ABS, LLC", FILED IN THIS OFFICE ON THE NINTH DAY OF JUNE, A.D.
2026, AT 2:21 O`CLOCK P.M.*



C. P. Sanchez

Charuni Patibanda-Sanchez, Secretary of State

10654955 8100
SR# 20263337830

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 204197956
Date: 06-10-26

**CERTIFICATE OF FORMATION
OF
VERO NETWORKS ABS, LLC**

ARTICLE I

NAME

The name of the limited liability company is VERO NETWORKS ABS, LLC (the "Company").

ARTICLE II

INITIAL REGISTERED OFFICE AND REGISTERED AGENT

The name of the registered agent is Corporation Service Company and the address of the registered agent and the Company's registered office required to be maintained by Section 18-104 of the Delaware Limited Liability Company Act (the "Act") is 251 Little Falls Drive, Wilmington, Delaware 19808, County of New Castle.

IN WITNESS WHEREOF, the undersigned authorized person of the Company has executed this Certificate of Formation as of the 9th day of June, 2026.

By: /s/ Gregg Strumberger
Gregg Strumberger, Authorized Person

EXHIBIT C

Certificate of Authority to Transact Business



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/

CHRISTOPHER WOLFFE
600 17TH STREET, SUITE 2800 SOUTH
DENVER, CO 80202, USA

06/12/2026

Filing Acknowledgment

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

Entity Name:	VERO NETWORKS ABS, LLC		
SOS Control #:	002120846	Initial Filing Date:	06/11/2026
Entity Type:	Foreign Limited Liability Company (LLC)	Formation Locale:	Delaware
Status:	Active	Duration Term:	Perpetual
Fiscal Year Close:	December	Annual Report Due:	04/01/2027
Business County:	(No County on Record)		
Managed By:	Member Managed		
Obligated Member Entity:	No		

Document Receipt

Receipt #: 2026-615279	Filing Fee:	\$300.00
Payment: Credit Card - 3922812950		\$300.00

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

Principal Office Address:
1023 WALNUT STREET
BOULDER, CO 80302, USA

Congratulations on the successful filing of your **Application for Registration of Foreign Limited Liability Company** for **VERO NETWORKS ABS, LLC** in the State of Tennessee which is effective on the date shown above. Please visit the Tennessee Department of Revenue website (www.tn.gov/revenue) to determine your online tax registration requirements. If you need to obtain a Certificate of Existence for this entity, you can request, pay for, and receive it from our website.

You must file an Annual Report with this office on or before the Annual Report Due Date noted above and maintain a Registered Office and Registered Agent. Failure to do so will subject the business to Administrative Dissolution/Revocation.

Tre Hargett
Secretary of State

Tracking Number
B2026547880

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/

Control #: 002120846
Filed: 06/11/2026 08:18 PM

Tre Hargett
Secretary of State

Entity Information

Entity Type: Limited Liability Company

Entity Name: VERO NETWORKS ABS, LLC

Fiscal Year Ending Month: December

Additional Designation: (No Additional Designation)

Is this a Series LLC?

☐ Yes ☒ No

Principal Office Address

1023 WALNUT STREET
BOULDER, CO 80302, USA

Mailing Address

1023 WALNUT STREET
BOULDER, CO 80302, USA

When and Where was the Organization Established?

Date Incorporated: 6/9/2026

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):

551114 - Corporate, Subsidiary, and Regional Managing Offices

The Limited Liability Company will be:

Member Managed

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

☒ Yes ☐ No

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

☐ Yes ☒ No

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

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.
- ☒ Pursuant to the provisions of T.C.A. § 48-249-904 of the Tennessee Revised Limited Liability Company Act, the undersigned hereby applies for a certificate of authority to transact business in the State of Tennessee.

Signed Electronically: GREGG STRUMBERGER

Date: 06/11/2026

Delaware

The First State

Page 1

I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "VERO NETWORKS ABS, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE ELEVENTH DAY OF JUNE, A.D. 2026.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "VERO NETWORKS ABS, LLC" WAS FORMED ON THE NINTH DAY OF JUNE, A.D. 2026.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.



10654955 8300

SR# 20263374785

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in cursive script, reading "C. P. Sanchez", written in black ink.

Charuni Patibanda-Sanchez, Secretary of State

Authentication: 204208960

Date: 06-11-26



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/

Date: 06/11/2026

Invoice: 2026-615279

Customer Information

CHRISTOPHER WOLFFE
VERO NETWORKS ABS, LLC
600 17TH STREET, SUITE 2800 SOUTH
DENVER, CO 80202, USA

Tracking #	Description	Amount Paid
B2026547880	Application for Registration of Foreign Limited Liability Company for VERO NETWORKS ABS, LLC (LLC Filings)	\$ 300.00
Payment Details		
Fee Total:		\$ 300.00
Payment Total:		\$ 300.00
Amount Due:		\$ 0.00
Payment Method		
Payment Type: Credit Card		
Check/Confirmation Number: 3922812950		

EXHIBIT D

Key Management and Officers

Key Management and Officers

Vero Networks ABS, LLC (“Applicant”) has the managerial qualifications necessary to provide the proposed services. Existing personnel of Applicant’s parent companies and affiliates, including Vero Fiber Networks, LLC (“Vero Fiber”) and VFN Holdings, Inc. (“VFN Holdings”), will be responsible for management of Applicant.

As limited liability companies, Applicant and Vero Fiber do not have any directors. The following individuals are Directors of VFN Holdings:

- Matt Erickson (Chairperson)
- Matt Geraghty
- Phil Canfield
- Rand Lewis
- Brent Burnett
- Peter Udbye
- Wali Bacdayan
- Pamela Moore
- Greg Friedman

The following individuals are Key Management and Officers of Applicant, Vero Fiber, and VFN Holdings:

- Matt Erickson, Chief Executive Officer, VFN Holdings
- Greg Friedman, Chief Financial Officer
- Pamela Moore, Chief Executive Officer, Vero Fiber
- Gregg Strumberger, Chief Legal Officer
- Roger Greene, Chief Commercial Officer, Vero Fiber
- Ken Korte, Network Operations Director, Vero Fiber
- Chris Pietila, General Counsel

As demonstrated in the following biographies, Applicant has the managerial qualifications necessary to provide the proposed services.

EXHIBIT E

Key Management Biographies

Management Biographies

Matt Erickson, Chief Executive Officer

Matt Erickson, is a founding member of Vero and serves as its Chief Executive Officer. Prior to Vero, Matt was COO and part of the senior executive team that founded Zayo. While COO, Matt oversaw most of Zayo's day-to-day business operations, including the integration of 30+ businesses and the construction of 17,000+ route miles of new network. Prior to Zayo, Matt was a Vice President at Level 3 Communications. Matt earned a B.S. (Summa Cum Laude with Honors) in Accounting from Colorado State University.

Greg Friedman, Chief Financial Officer

Greg Friedman is a Founding Member of Vero and serves as the CFO. Greg has 17 years of experience in the telecommunications, financial services and real estate industries. Greg was previously Executive Vice President at Zayo Group, LLC, where he managed all aspects of Zayo's datacenter business (colocation and cloud computing). Prior to that, Greg held various executive roles at Zayo, including CFO of Zayo's Fiber Infrastructure business and Senior Vice President/General Manager of Zayo's Ethernet business, as well as management positions at Level 3 Communications, Deloitte, and Cap Gemini. He received a B.S. in Economics from the University of Pennsylvania and an MBA with Honors from the Wharton School.

Gregg Strumberger, Chief Legal Officer

Gregg Strumberger is a founding member of Vero and serves as Chief Legal Officer. Gregg has over 24 years of experience in the Communications and Internet industries. Prior to Vero, Gregg held several legal and business leadership roles at Zayo, including General Counsel of Dark Fiber and Mobile Infrastructure Services and General Counsel of Zayo Canada, Inc. Prior to Zayo, Gregg served as Corporate Counsel at Level 3 and as an Associate at the law firms of Hughes, Hubbard & Reed in New York, NY and Swidler & Berlin in Washington, D.C.

Chris Pietila, General Counsel

Chris Pietila serves as General Counsel for the Vero companies. Chris has 17 years of experience as an attorney in the Communications and Internet industries. Prior to Vero, Chris served as Deputy General Counsel at Cablevision Lightpath, Associate General Counsel, Network Infrastructure at Facebook (now Meta), and as Corporate Counsel at Level 3. Prior to Level 3, Chris was an associate in the law firms of Brownstein Hyatt Farber Schreck in Denver, CO, and Paul, Weiss, Rifkind, Wharton & Garrison in Washington, D.C. Chris has a J.D. from The George Washington University Law School, and an M.S. in Telecommunications and B.S. in Business Administration from the University of Colorado.

Pamela Moore, Chief Executive Officer, Vero Fiber

Pam Moore is CEO of Vero Fiber. Before joining Vero, Pam was Principal/Owner of a consulting company advising clients on fiber and data center transactions. Previously, Pam served 8 years at Zayo, holding leadership roles in the Ethernet, Long Haul Dark Fiber and datacenter business units. Prior to Zayo, Pam held management roles at ICG and Level 3 Communications. Pam has a BSBA in Finance from the University of Denver and an MBA from Regis University.

Roger Greene, Chief Commercial Officer, Vero Fiber

Roger Greene is the Chief Commercial Officer of Vero Fiber. Roger has more than 20 years of experience in the Communications and Internet industries. Before joining Vero, Roger spent 10 years at Meta as part of its Network Investments group, following 11 years at Level 3 Communications (now Lumen) in various Product, Business Development and commercial leadership roles focused on scaling network infrastructure.

Ken Korte, Network Operations Director, Vero Fiber

Ken Korte is the Director of Network Operations for Vero Fiber. Ken is a United States Marine Corps veteran and has 18 years of experience in the telecommunications industry. Prior to Vero, Ken was the Executive Director for Extenet Systems Network Protection department, with previous leadership and management roles at Mobilitie, Black & Veatch, and Clearwire.

CONFIDENTIAL EXHIBIT F-1

(Included in 2025 Audit Financial Statements)

Balance Sheet

CONFIDENTIAL EXHIBIT F-2

(Included in 2025 Audit Financial Statements)

Income Statement

CONFIDENTIAL EXHIBIT F-3

(Included in 2025 Audit Financial Statements)

Cash Flow Statement

EXHIBIT F-4

Evidence of Surety Bond

TENNESSEE PUBLIC UTILITY COMMISSION

TENNESSEE TELECOMMUNICATIONS SERVICE PROVIDER'S SURETY BOND

Bond #: 0277151

WHEREAS, Vero Networks ABS, LLC (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, Berkley 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 30th 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

Vero Networks ABS, LLC
Name of Company authorized by the TPUC

Company ID # as assigned by TPUC

SIGNATURE OF PRINCIPAL

By: Chris Pietila
Name: CHRIS PIETILA
Title: GENERAL COUNSEL

SURETY

Berkley Insurance Company
Name of Surety
475 Steamboat Road
Greenwich, CT 06830
Address of Surety

SIGNATURE OF SURETY AGENT

By: Brandi J. Tetley
Name: Brandi J. Tetley
Title: Attorney-in-Fact
Address of Surety Agent:
IMA, Inc.
1705 17th Street, Suite 100
Denver, CO 80202



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 COLORADO
COUNTY OF ARAPAHOE

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

WITNESS my hand and seal this 30th day of June, 2026.

My Commission Expires:

November 18th, 2028


Notary Public

ACKNOWLEDGMENT OF SURETY

STATE OF Colorado
COUNTY OF Denver

MICAH JOSEPH SEMMELBECK
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20244042112
MY COMMISSION EXPIRES 11/18/2028

Before me, a Notary Public of the State and County aforesaid, personally appeared Brandi J. Tetley with whom I am personally acquainted and who, upon oath, acknowledged himself to be the individual who executed the foregoing bond on behalf of Berkley Insurance Company, 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 30th day of June, 2026.

My Commission Expires:

July 15, 2029



Notary Public Alexa Leigh Millar

APPROVAL AND INDORSEMENT

ALEXA LEIGH MILLAR
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20254026548
MY COMMISSION EXPIRES JULY 15, 2029

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 _____.

Name:

Title:

EXHIBIT G

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

Vero Networks ABS, LLC

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

Pursuant to T.C.A. §65-5-112, as amended, Vero Networks ABS, LLC (“Applicant”) 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 telecommunications services in the State of Tennessee.

I. PURPOSE

The purpose of T.C.A. § 65-5-112 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. Applicant is committed to the goals of T.C.A. § 65-5-112 and to taking steps to support the participation of small and minority-owned telecommunications businesses in the telecommunications industry. Applicant 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, Applicant will make effort to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to Applicant of such opportunities. Applicant’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, Applicant will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in § 65-5-112:

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

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

III. ADMINISTRATION

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

Chris Pietila
General Counsel
Vero Networks ABS, LLC
1580 N Logan St. - Ste 660 - PMB 613180
Denver, CO 80203-1994
Tel: 303-350-4060
cpietila@veronetworks.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 cooperate 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 Applicant 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, 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.

IV. RECORDS AND COMPLIANCE REPORTS

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

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

Vero Networks ABS, LLC

By: /s/ 

Chris Pietila
General Counsel

Dated: JULY 1st, 2026

EXHIBIT H

Notice of Application & Certificate of Service

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

**In the Matter of the Application of
Vero Networks ABS, LLC**

**For a Certificate of Convenience
And Necessity to Provide Competitive
Local Exchange and Interexchange
Telecommunications Services in the
State of Tennessee**

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Docket No. _____

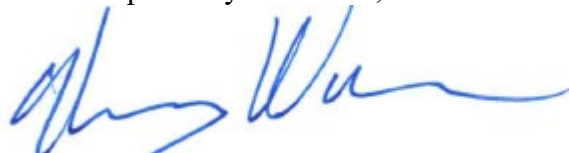
NOTICE OF FILING

TO: ALL INCUMBENT LOCAL EXCHANGE CARRIERS (ILECS)

PLEASE TAKE NOTICE, that in accordance with the Tennessee Public Utility Commission Rules for the Provision of Competitive Intrastate Telecommunications Services, you are hereby given notice that Vero Networks ABS, LLC filed an Application for a Certificate of Convenience and Necessity to Provide Competing Local Exchange and Interexchange Telecommunications Services.

This 2nd day of July, 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

Incumbent Local Exchange Carriers (ILECs)

- | | |
|--|---|
| 1. Ardmore Telephone Company, Inc.
P.O. Box 549
517 Ardmore Avenue
Ardmore, TN 38449 | 9. Humphreys County Telephone Company
525 Junction Road
Madison, WI 53717 |
| 2. Bellsouth Telecommunications, Inc.
333 Commerce Street, Suite 2106
Nashville, TN 37201-3300 | 10. Loretto Telephone Company, Inc.
P.O. Box 130
Loretto, TN 38469 |
| 3. Brightspeed of Appalachia, LLC
P.O. Box 1330
Fayetteville, NC 28302 | 11. Millington Telephone Company, Inc.
4880 Navy Road
Millington, TN 38083 |
| 4. Brightspeed of East Tennessee, LLC
P.O. Box 1330
Fayetteville, NC 28302 | 12. Peoples Telephone Company
P.O. Box 24207
Jackson, MS 39225
Attn: Lisa Wigington |
| 5. Brightspeed of Southern Tennessee, LLC
P.O. Box 1330
Fayetteville, NC 28302 | 13. Tellico Telephone Company
P.O. Box 9
102 Spence Street
New Johnsonville, TN 37385-0009 |
| 6. Brightspeed of Western Tennessee, LLC
P.O. Box 1330
Fayetteville, NC 28302 | 14. United Telephone Company
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034 |
| 7. Crockett Telephone Company
P.O. Box 24207
Friendship, TN 38034
Attn: Lisa Wigington | 15. West Tennessee Telephone Company, Inc.
P.O. Box 10
244 E. Main Street
Bradford, TN 38316 |
| 8. Frontier Communications of Tennessee
300 Bland Street
Bluefield, WV 24701 | |

EXHIBIT I

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 J

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. 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.

**Chris Pietila
General Counsel
Vero Networks ABS, LLC
1580 N Logan St. - Ste 660 - PMB 613180
Denver, CO 80203-1994
Tel: 303-350-4060
cpietila@veronetworks.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 status and regulations and will abide by them to the extent it undertakes telemarketing in Tennessee in the future.

EXHIBIT K

Sworn Pre-Filed Testimony

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

In the Matter of the Application of

Vero Networks ABS, 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 CHRIS PIETILA

I, Chris Pietila, do hereby testify as follows in support of the application of Vero Networks ABS, LLC (“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 Chris Pietila, I am General Counsel of Vero Networks ABS, LLC (“Applicant” or the “Company”). My business address is 1580 N Logan St. - Ste 660 - PMB 613180, Denver, CO 80203-1994. I am authorized to provide this testimony on behalf of Applicant.

Q: Please briefly describe your duties.

A: I am currently responsible for all regulatory and legal functions of the Company.

Q: Please describe your business experience and educational background.

A: I have nearly 17 years of experience as an attorney in the Communications and Internet industries. Prior to Vero, I served as Deputy General Counsel at Cablevision Lightpath, Associate General Counsel, Network Infrastructure at Facebook (now Meta), and as Corporate

Counsel at Level 3. Prior to Level 3, I was an associate in the law firms of Brownstein Hyatt Farber Schreck in Denver, CO, and Paul, Weiss, Rifkind, Wharton & Garrison in Washington, D.C. I have a J.D. from The George Washington University Law School, and an M.S. in Telecommunications and B.S. in Business Administration from the University of Colorado.

Q: Are all statements in Applicant'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: Applicant's principal place of business is located at 3575 Ringsby Court, Suite #320, Denver, CO 80216. Applicant is directly, wholly owned by Vero Funding, LLC, a Delaware limited liability company. Vero Funding, LLC is directly, wholly owned by Vero Guarantor, LLC, a Delaware limited liability company. Vero Funding, LLC and Vero Guarantor, LLC have the same principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216. Vero Guarantor, LLC is directly, wholly owned by Vero ABS Parent, LLC, a Colorado limited liability company with its principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216. Vero ABS Parent, LLC is jointly owned by Vero Fiber Networks, LLC ("Vero Fiber"), a Colorado limited liability company with its principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216, and Vero Broadband, LLC ("Vero Broadband"), a Colorado limited liability company with its principal place of business at 740 US-24, Woodland Park, CO 80863. Vero Fiber is directly, wholly owned, and Vero Broadband is indirectly wholly owned by VFN Holdings, Inc. ("VFN Holdings"), a Delaware corporation with its principal place of business located at 3575 Ringsby Court, Suite #320, Denver, CO 80216.

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

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

Q: Please describe Applicant's financial qualifications.

A: Applicant 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 Exhibits F-1, F-2 and F-3.**

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

A: Applicant has the managerial qualifications necessary to provide the proposed services in Tennessee, as Applicant is managed by a well-qualified and highly skilled team with substantial expertise and experience through its parent companies. The biographies included with the Application as **Exhibit E** 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, Applicant 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 Applicant offer?

A: Applicant seeks authority to provide competing local exchange telecommunications services throughout the State of Tennessee. Applicant's primary business is to provide essential telecommunications and broadband infrastructure to underserved schools and libraries, both directly and through wholesale arrangements, by connecting those schools and libraries with

reliable, scalable, and secure connectivity. Applicant intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs. Applicant also intends to provide telecommunications and broadband infrastructure services to other educational, healthcare, government, banking, telecommunications and business customers throughout the state. Applicant will primarily provide services using its own facilities, including those of Vero Fiber, and facilities leased from other carriers, but also seeks authority to provide services on a resold basis.

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

A: Applicant does not have plans to provide retail switched voice services, including dial tone to end-user customers in Tennessee. Applicant will provide services to educational, healthcare, government, banking, telecommunications and business customers in the State of Tennessee on a wholesale basis and does not intend to directly serve residential customers.

Q: Does Applicant 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: Applicant requests authority to provide non-switched local exchange services throughout the State of Tennessee. The services proposed by Applicant may include enterprise customers and providers that are located in areas served by an incumbent local exchange telephone company with fewer than 100,000 total access lines. Applicant 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 Applicant 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. Applicant'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 Applicant intend to comply with all TPUC rules, statutes, and orders pertaining to the provision of telecommunications services in Tennessee, including those for disconnection and reconnection of service?

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

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

A: No. Neither Applicant 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 Applicant or one of its affiliates?

A: No. Neither Applicant nor its affiliates have had its authority to provide telecommunications services in any state revoked.

Q: Has Applicant 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 Applicant's operations and will serve as its regulatory and customer service contact?

A: Chris Pietila is knowledgeable about Applicant's operations and will serve as its regulatory contact and customer service contact.

Q: Please explain in detail Applicant'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.

Chris Pietila

Chris Pietila
General Counsel
Vero Networks ABS, LLC

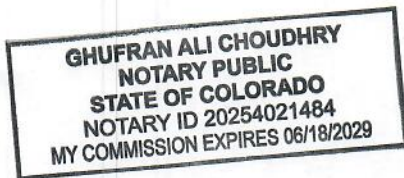
Respectfully submitted this 5th day of JULY, 2026

[Signature]

Notary Public
State of COLORADO

County of ARAPAHOE

My commission expires 06-18-2029



Verification

STATE OF COLORADO
COUNTY OF ARAPAHOE

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§
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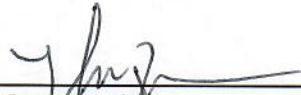
VERIFICATION

I, Chris Pietila, state that I am General Counsel, at Vero Networks ABS, LLC, ("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 with respect to the Company are true and correct to the best of my knowledge, information, and belief.



Chris Pietila
General Counsel
Vero Networks ABS, LLC

Sworn and subscribed before me this 1st day of July, 2026.



Notary Public

My commission expires 06-18-2029

GHUFRAN ALI CHOUDHRY
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20254021484
MY COMMISSION EXPIRES 06/18/2029