

Morgan Lewis

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July 24, 2025

Via Alternative E-File and Overnight Courier

Sallie K. Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334

Re: Application of Zayo Network Services, LLC for a Certificate of Authority to Provide Competitive Local Exchange Service

Dear Ms. Tanner:

On behalf of Zayo Network Services, LLC ("Applicant"), enclosed for electronic filing with the Commission is the above-referenced Application.

Pursuant to GA. Comp. R. & Regs. r. 515-3-1.11, Applicant respectfully requests trade secret protection of **TRADE SECRET Exhibit E, "Financial Information of Applicant"** (the "Trade Secret Exhibit") to the Application, submitted as a Trade Secret attachment in the Alternative e-File system. The Trade Secret Exhibit contains business and financial information that is trade secret confidential, sensitive, and proprietary. Therefore, Applicant respectfully requests that the Commission protect the Trade Secret Exhibit as trade secret and not release it to the public without its express consent (except as provided for under GA. Comp. R. & Regs. r. 515-3-1.11). In support, Applicant encloses a copy of the Request for Trade Secret Treatment supported by an affidavit.

Applicant is sending one copy of the Application, Trade Secret Exhibit, and Request for Trade Secret Treatment to the Commission via overnight courier. Please date-stamp the enclosed extra copy of this letter transmitting the Trade Secret Exhibit and Request for Trade Secret Treatment and return it in the envelope provided.

Please acknowledge receipt and acceptance of this filing. Should you have any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Patricia Cave

Catherine Wang

Patricia Cave

Counsel for Zayo Network Services, LLC

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001



Georgia Public Service Commission

244 WASHINGTON STREET, SW
ATLANTA, GEORGIA 30334-5701

APPLICATION FOR CERTIFICATE OF AUTHORITY TO PROVIDE COMPETITIVE LOCAL EXCHANGE SERVICE (CLEC)

Please file the completed application electronically at <https://psc.ga.gov/alternative-efile/>.

Please also mail one (1) hard copy of the application and any attachments to:

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Questions regarding filing procedures should be directed to Sallie Tanner at (404) 463-7747 or stanner@psc.ga.gov.

Questions regarding the application should be directed to Erica Wilson at (404) 651-9402 or ewilson@psc.ga.gov.



Georgia Public Service Commission

244 WASHINGTON STREET, SW
ATLANTA, GEORGIA 30334-5701

APPLICATION FOR CERTIFICATE OF AUTHORITY TO PROVIDE COMPETITIVE LOCAL EXCHANGE SERVICE (CLEC)

I. APPLICANT

NAME OF COMPANY	Zayo Network Services, LLC ("Zayo Network Services" or "Applicant")				
ADDRESS 1	1401 Wynkoop Street				
ADDRESS 2	Suite 500				
CITY	Denver	STATE	Colorado	ZIP CODE	80202
TELEPHONE	303-381-3239	FAX			

EMPLOYEE DESIGNATED TO RECEIVE AND RESPOND TO COMMISSION REQUESTS:

NAME	Lauren Lantero	TITLE	Chief Legal Officer & Secretary		
ADDRESS 1	1401 Wynkoop Street				
ADDRESS 2	Suite 500				
CITY	Denver	STATE	Colorado	ZIP CODE	80202
TELEPHONE	303-381-3239	FAX			
EMAIL ADDRESS	lauren.lantero@zayo.com				

NOTE: FAILURE TO NOTIFY THE COMMISSION, IN WRITING, WHEN THERE IS A CHANGE IN THE CONTACT PERSON OR ADDRESS(ES) LISTED IN THIS APPLICATION WILL RESULT IN CANCELATION OF THE APPLICATION OR SUBSEQUENT CERTIFICATE OF AUTHORITY.

APPLICATION FOR CERTIFICATE OF AUTHORITY
TO PROVIDE
COMPETITIVE LOCAL EXCHANGE SERVICE
(CLEC)

Revised 06/10/2024

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

II. ATTORNEY OR AGENT

IF APPLICANT IS NOT A GEORGIA CORPORATION, GIVE NAME AND ADDRESS OF AN ATTORNEY OR AGENT IN THE STATE OF GEORGIA UPON WHOM PROCESS MAY BE SERVED IN ANY SUIT AGAINST APPLICANT.

ATTORNEY NAME					
NAME OF FIRM	Corporation Service Company				
ADDRESS 1	2 Sun Court				
ADDRESS 2	Suite 400				
CITY	Peachtree Corners	STATE	Georgia	ZIP CODE	30092
TELEPHONE	+1 302 421 6100	FAX			
EMAIL ADDRESS					

III. ORGANIZATION

STATE AND DATE OF INCORPORATION:

STATE	Delaware	DATE	April 18, 2024
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LIST THE NAMES, TITLES, AND ADDRESSES (IF DIFFERENT FROM ABOVE) OF ALL OFFICERS OR PARTNERS:

NAME	TITLE	ADDRESS	
Steve Smith	Chief Executive Officer		
Jeff Noto	Chief Financial Officer & Treasurer		
Lauren Lantero	Chief Legal Officer & Secretary		
Robert Merkel	Assistant Treasurer		
Gabriela Torresani	Assistant Secretary		

ATTACH A COPY OF THE CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS ISSUED BY THE GEORGIA SECRETARY OF STATE.

EXHIBIT A

PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").

IF APPLICANT IS A SUBSIDIARY, PARENT, OR AFFILIATE OF ANY OTHER COMPANY, REGARDLESS OF TYPE OR INDUSTRY, ATTACH A CHART SHOWING THE RELATIONSHIP OF THE APPLICANT TO ALL AFFILIATED COMPANIES.

EXHIBIT B

PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").

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IF NO AFFILIATED COMPANIES, SO STATE.	
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IV. EXISTING AUTHORITY

DOES THE APPLICANT OR ANY AFFILIATED COMPANY HAVE EXISTING CERTIFICATES OF AUTHORITY ISSUED BY THE GPSC? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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IF YES, PLEASE LIST THE NAME OF EACH COMPANY AND THE CERTIFICATE NUMBER(S):
<ul style="list-style-type: none"> • Zayo Group, LLC: X-1103; L-0496; R-1110; 7325; Unassigned, issued in Docket No. 42322 • ENA Healthcare Services, LLC: R-1045; 6946 • Lumos Fiber of Georgia, LLC: L-7969

DOES THE APPLICANT OR ANY AFFILIATED COMPANY HAVE EXISTING AUTHORITY GRANTED BY ANY STATE OR FEDERAL ENTITY? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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IF YES, PLEASE LIST THE NAME OF EACH COMPANY AND THE STATE OR FEDERAL ENTITY THAT GRANTED SUCH AUTHORITY:

<p>Entities affiliated with Applicant authorized to provide telecommunications services include:</p> <ul style="list-style-type: none"> • Zayo Group, LLC: Federal Communications Commission; the Public Utility Commission or equivalent for every U.S. state and the District of Columbia, except Alaska. • Zayo Midwest, LLC: Illinois Commerce Commission; Indiana Utility Regulatory Commission; Michigan Public Service Commission; Minnesota Public Utilities Commission; Wisconsin Public Service Commission. • Zayo Education Inc. (f/k/a Education Networks of America, Inc.): California Public Utilities Commission; South Dakota Public Utilities Commission. • Zayo Education, LLC (f/k/a ENA Services, LLC): Federal Communications Commission; Florida Public Service Commission; Indiana Utility Regulatory Commission; Tennessee Public Utility Commission. • ENA Healthcare Services, LLC: Federal Communications Commission; Arizona Corporation Commission; Arkansas Public Service Commission; California Public Utilities Commission; Colorado Public Utilities Commission; Georgia Public Service Commission; Indiana Utility Regulatory Commission; Kansas Corporation Commission; Minnesota Public Utilities Commission; Missouri Public Service Commission; New Mexico Public Regulation Commission; Oklahoma Corporation Commission; Oregon Public Utility Commission; Public Utility Commission of Texas; Utah Public Service Commission; Washington Utilities and Transportation Commission; and West Virginia Public Service Commission. • Lumos Telephone LLC: Federal Communications Commission; Virginia State Corporation Commission. • Lumos Telephone of Botetourt LLC: Federal Communications Commission; Virginia State Corporation Commission. • North State Telephone, LLC: Federal Communications Commission; North Carolina Utilities Commission.
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PUBLIC - TRADE SECRET INFORMATION EXTRACTED

- **North State Communications, LLC:** Federal Communications Commission; North Carolina Utilities Commission.
- **North State Communications Long Distance, LLC:** Federal Communications Commission; North Carolina Utilities Commission.
- **North State Communications Advanced Services, LLC:** Federal Communications Commission; North Carolina Utilities Commission.
- **Lumos Fiber of South Carolina, LLC:** Federal Communications Commission; South Carolina Public Service Commission.
- **Lumos Fiber of Kentucky, LLC:** Kentucky Public Service Commission.
- **Lumos Fiber of Georgia, LLC:** Georgia Public Service Commission.
- **Lumos Fiber of Ohio, LLC:** Public Utilities Commission of Ohio.
- **Lumos Fiber of Indiana, LLC:** Indiana Utility Regulatory Commission.

In addition to the entities above, the following entities affiliated with Applicant have pending, or plan to file, applications to provide telecommunications services: Lumos Fiber of Maryland, LLC (with the Maryland Public Service Commission); Lumos Fiber of Missouri, LLC (with the Missouri Public Service Commission); Lumos Fiber of Tennessee, LLC (with the Tennessee Public Utility Commission); and Lumos Fiber of West Virginia, LLC (with the West Virginia Public Service Commission).

HAS THE APPLICANT OR ANY AFFILIATED COMPANY HAD ANY PREVIOUS AUTHORITY REVOKED BY ANY STATE OR FEDERAL ENTITY? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	<input type="checkbox"/>	NO	<input checked="" type="checkbox"/>
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IF YES, PLEASE LIST THE NAME OF EACH COMPANY AND THE STATE OR FEDERAL THAT REVOKED SUCH AUTHORITY:

Not applicable.

ATTACH A COPY OF ALL ORDERS REVOKING AUTHORITY.
PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").

V. COMPLIANCE WITH COMMISSION RULES AND ORDERS

COMMISSION RULE 515-12-1-.34 CODE OF CONDUCT FOR WINBACK ACTIVITIES REQUIRES CLECS TO ANNUALLY FILE BY MARCH 31 OF EACH YEAR CUSTOMER SERVICE CONTACT INFORMATION AND COMPANY CONTACT ESCALATION.

DOES THE APPLICANT AGREE TO COMPLY WITH COMMISSION RULE 515.12-1.34? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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COMMISSION RULE 515-12-1-.37 FAMILY VIOLENCE SHELTER CONFIDENTIALITY REQUIRES CLECS TO SUBMIT AN AFFIDAVIT UPON CERTIFICATION AND ON JANUARY 31 OF EACH ODD-NUMBERED YEAR THEREAFTER AN AFFIDAVIT ATTESTING THAT THE CARRIER WILL COMPLY WITH THE REQUIREMENTS OF THE RULE.

DOES THE APPLICANT AGREE TO COMPLY WITH COMMISSION RULE 515.12-1.37? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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DOWNLOAD CURRENT FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AFFIDAVIT FROM THE GPSC WEBSITE . ATTACH EXECUTED AND NOTARIZED AFFIDAVIT TO THE APPLICATION. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., EXHIBIT A).	EXHIBIT C			
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COMMISSION RULE 515-12-1-.38 TELECOMMUNICATIONS RELAY SERVICE REQUIRES CLECS TO REMIT CONTRIBUTIONS ON A QUARTERLY BASIS TO THE TELECOMMUNICATIONS RELAY SERVICE FUND.

DOES THE APPLICANT AGREE TO COMPLY WITH COMMISSION RULE 515.12-1.38? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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COMMISSION RULE 515-12-1-.39 UNIVERSAL ACCESS FUND REQUIRES CLECS TO REMIT CONTRIBUTIONS ON A QUARTERLY BASIS TO THE UNIVERSAL ACCESS FUND.

DOES THE APPLICANT AGREE TO COMPLY WITH COMMISSION RULE 515.12-1.39? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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DOES THE APPLICANT AGREE TO COMPLY WITH ALL OTHER APPLICABLE COMMISSION RULES AND ORDERS? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	
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VI. COMPETITIVE LOCAL EXCHANGE SERVICE

WHAT CUSTOMER CLASS(ES) DOES THE APPLICANT PROPOSE TO SERVE? (PLACE AN "X" IN THE APPROPRIATE BOXES.)	BUSINESS	X
	RESIDENTIAL	
	OTHER (LIST BELOW)	

SELECT THE METHOD(S) BY WHICH SERVICE WILL BE PROVIDED. (PLACE AN "X" IN THE APPROPRIATE BOXES.)	RESALE	X
	FACILITIES-BASED	X

IF FACILITIES-BASED, PLEASE ANSWER THE FOLLOWING QUESTIONS.

WILL THE FACILITIES BE NEWLY CONSTRUCTED OR ACQUIRED THROUGH LEASE OR PURCHASE? (PLACE AN "X" IN THE APPROPRIATE BOXES.)	NEW CONSTRUCTION	X
	ACQUISITION	X

IF NEW CONSTRUCTION, PLEASE DESCRIBE THE LOCATION AND TYPE OF FACILITIES THAT WILL BE CONSTRUCTED.

This Application is filed in connection with certain restructuring and financing arrangements in which Applicant's parent, Zayo Group, LLC ("Zayo Group") 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"). A filing regarding the *Pro Forma Asset Transfer* will be separately filed.

Though Applicant has no current plans to construct additional facilities, Applicant seeks the authority to do so should future market conditions warrant.

IF ACQUISITION, PLEASE DESCRIBE THE LOCATION AND TYPE OF FACILITIES THAT WILL BE ACQUIRED.

Applicant plans to use fiber optic cable along with other equipment and facilities to originate, terminate, and amplify signals. Applicant does not currently own or lease facilities in Georgia but rather will use the communications optical fiber and associated telecommunications equipment assigned to Applicant by Zayo Group or leased from an affiliate or another provider after Applicant is certificated.

PROVIDE A BREAKDOWN OF ANTICIPATED COSTS OF FACILITIES.

No new facilities are proposed for deployment in Georgia at this time. Applicant intends to provide services primarily using its own facilities throughout the state of Georgia, which will be acquired from Applicant's affiliate Zayo Group after Applicant is certificated through the *Pro Forma Asset Transfer* described above.

TARIFFS FOR LOCAL EXCHANGE SERVICES ARE NO LONGER REQUIRED TO BE FILED WITH THE COMMISSION. DOES THE COMPANY WISH TO MAINTAIN A LOCAL EXCHANGE SERVICES TARIFF WITH THE COMMISSION? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES		NO	X
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IF YES, PLEASE ATTACH A LOCAL EXCHANGE SERVICES TARIFF. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

IF NO, PLEASE PROVIDE THE WEB ADDRESS WHERE THE APPLICANT'S GEORGIA TARIFFS OR PRICE GUIDES MAY BE FOUND.	https://www.zayo.com/policies/us-tariffs/			
PURSUANT TO O.C.G.A. § 46-5-166(E), PROVIDERS OF ACCESS SERVICES MUST FILE ACCESS SERVICES TARIFFS WITH THE COMMISSION. DOES THE APPLICANT INTEND TO PROVIDE ACCESS SERVICES? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES		NO	X
IF YES, PLEASE ATTACH AN ACCESS SERVICES TARIFF. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").				

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VII. TECHNICAL CAPABILITY

ATTACH RESUMES AND/OR PROFILES OF THE APPLICANT’S MANAGEMENT TEAM. DESCRIBE EACH TEAM MEMBER’S TECHNICAL QUALIFICATIONS, INCLUDING ANY RELEVANT WORK EXPERIENCE, EDUCATION, AND TRAINING.

EXHIBIT D

PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., “EXHIBIT A”).

VIII. FINANCIAL CAPABILITY

PROVIDE AUDITED FINANCIAL STATEMENTS FOR THE MOST RECENT FISCAL YEAR. IF AUDITED FINANCIAL STATEMENTS ARE UNAVAILABLE, PROVIDE UNAUDITED INCOME STATEMENT, BALANCE SHEET, AND STATEMENT OF CASH FLOWS FOR MOST RECENT FISCAL YEAR.

TRADE SECRET
EXHIBIT E

PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., “EXHIBIT A”).

IS APPLICANT PRESENTLY INVOLVED IN ANY LITIGATION?
(PLACE AN “X” IN THE APPROPRIATE BOX.)

YES

NO

X

IF YES, PLEASE DESCRIBE EACH CASE IN DETAIL (PARTIES, SUBJECT MATTER, JURISDICTION, CASE NUMBER, ETC.):

Not applicable.

IX. AFFIDAVIT

OFFICER OR ATTORNEY/ AGENT:				
NAME	Lauren Lantero			
TITLE	Chief Legal Officer & Secretary			
ADDRESS 1	1401 Wynkoop Street			
ADDRESS 2	Suite 500			
CITY	Denver	STATE	Colorado	ZIP CODE 80202

THE INDIVIDUAL NAMED ABOVE (HEREINAFTER, "APPLICANT") PERSONALLY APPEARED BEFORE THE UNDERSIGNED, AN OFFICER DULY AUTHORIZED TO ADMINISTER OATHS. THE APPLICANT, AFTER FIRST BEING DULY SWORN, DEPOSES AND CERTIFIES THAT HE OR SHE HAS READ THE APPLICATION AND KNOWS THE CONTENTS THEREOF, AND THAT THE STATEMENTS MADE HEREIN ARE TRUE TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF.

APPLICANT FURTHER AGREES TO ABIDE BY ALL APPLICABLE LAWS UNDER THE STATE OF GEORGIA, AS CODIFIED IN THE OFFICIAL CODE OF GEORGIA ANNOTATED; ALL APPLICABLE RULES AND REGULATIONS OF THE GEORGIA PUBLIC SERVICE COMMISSION; AND ALL FINDINGS, CONCLUSIONS, TERMS, AND CONDITIONS SET FORTH IN PERTINENT COMMISSION ORDERS.

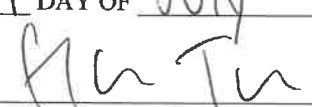
UNDER PENALTIES OF PERJURY, APPLICANT DECLARES THAT THE STATEMENTS MADE IN THE FOREGOING APPLICATION, INCLUDING ACCOMPANYING STATEMENTS AND ATTACHMENTS ARE TRUE, COMPLETE, AND CORRECT. I UNDERSTAND THAT ANY FALSE OR MISLEADING INFORMATION IN, OR IN CONNECTION WITH, MY APPLICATION MAY BE CAUSE FOR DENIAL OR LOSS OF CERTIFICATE.



 SIGNATURE OF AFFIANT

7-24-25

 DATE

SUBSCRIBED AND SWORN TO ME THIS
24th DAY OF JULY, 2025.


 NOTARY PUBLIC

State of Colorado
 County of Denver
 (SEAL)

GABRIELA TORRESANI
 Notary Public
 State of Colorado
 Notary ID # 20234006075
 My Commission Expires 02-14-2027

Commission expiration: 2-14-27

APPLICATION FOR CERTIFICATE OF AUTHORITY
 TO PROVIDE
 COMPETITIVE LOCAL EXCHANGE SERVICE
 (CLEC)

Revised 06/10/2024

EXHIBIT LIST

Exhibit A	Certificate of Authority to Transact Business
Exhibit B	Corporate Structure Chart
Exhibit C	Family Violence Shelter Confidentiality Affidavit
Exhibit D	Management Biographies
Trade Secret Exhibit E	Financial Statements [TRADE SECRET — FILED UNDER SEAL]

EXHIBIT A

Certificate of Authority to Transact Business

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

CERTIFICATE OF AUTHORITY

I, **Brad Raffensperger**, the Secretary of State and the Corporation Commissioner of the State of Georgia, hereby certify under the seal of my office that

Zayo Network Services, LLC
a Foreign Limited Liability Company

has been duly formed under the laws of **Delaware** and has filed an application meeting the requirements of Georgia law to transact business as a **Foreign Limited Liability Company** in this state.

WHEREFORE, by the authority vested in me as Secretary of State, the above **Foreign Limited Liability Company** is hereby granted, on **06/19/2025**, a certificate of authority to transact business in the State of Georgia as provided by Title 14 of the Official Code of Georgia Annotated. Attached hereto is a true and correct copy of said application.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on **06/27/2025**.



Brad Raffensperger

Brad Raffensperger
Secretary of State

APPLICATION FOR CERTIFICATE OF AUTHORITY

Electronically Filed
Secretary of State
Filing Date: 6/19/2025 11:35:25 AM

BUSINESS INFORMATION

CONTROL NUMBER 25125414
BUSINESS NAME Zayo Network Services, LLC
BUSINESS TYPE Foreign Limited Liability Company
EFFECTIVE DATE 06/19/2025
HOME JURISDICTION Delaware
DURATION Perpetual
NAME IN HOME STATE Zayo Network Services, LLC
DATE OF FORMATION IN HOME JURISDICTION 04/18/2025
COMMENCEMENT DATE IN GEORGIA 06/17/2025

PRINCIPAL OFFICE ADDRESS

ADDRESS 1401 Wynkoop Street, #500, Denver, CO, 80202, USA

RECORDS ADDRESS

ADDRESS 1401 Wynkoop Street, #500, Denver, CO, 80202, USA

REGISTERED AGENT

NAME	ADDRESS	COUNTY
Corporation Service Company	2 Sun Court, Suite 400, Peachtree Corners, GA, 30092, USA	Gwinnett

MANAGER(S)

NAME	TITLE	ADDRESS
Zayo Issuer, LLC	MANAGER	1401 Wynkoop Street, #500, Denver, CO, 80202, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE Gabriela Torresani
AUTHORIZER TITLE Authorized Person

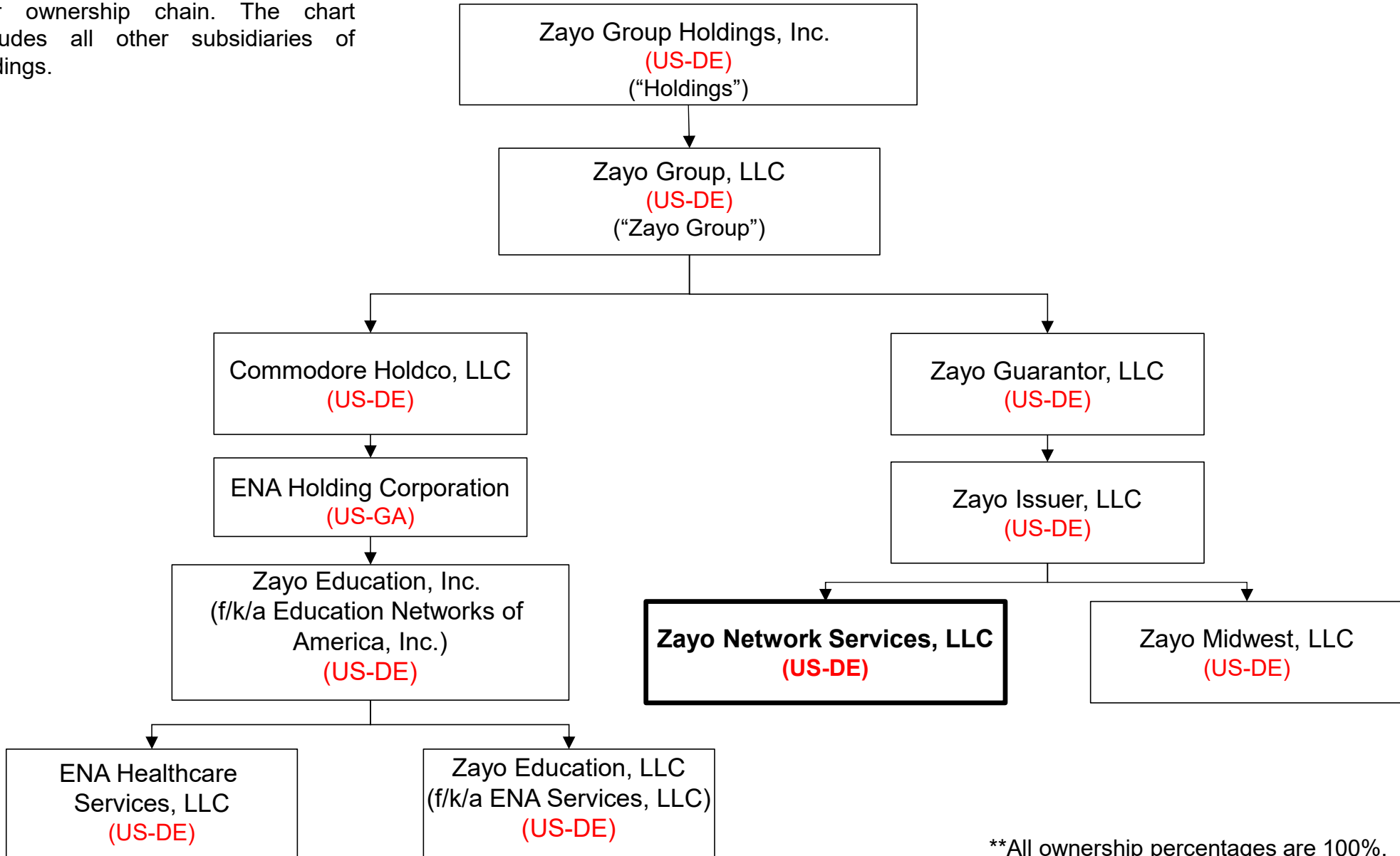
The foreign limited liability company undertakes to keep its records at the address shown above until its registration in Georgia is canceled or withdrawn. The foreign limited liability company, in accordance with Title 14 of the Official Code of Georgia Annotated, appoints the Secretary of State as agent for service of process if no agent has been appointed in Georgia or, if appointed, the agent's authority has been revoked or the agent cannot be found or served by the exercise of reasonable diligence.

EXHIBIT B

Corporate Structure Chart

CORPORATE OWNERSHIP STRUCTURE*
(Chart 1)

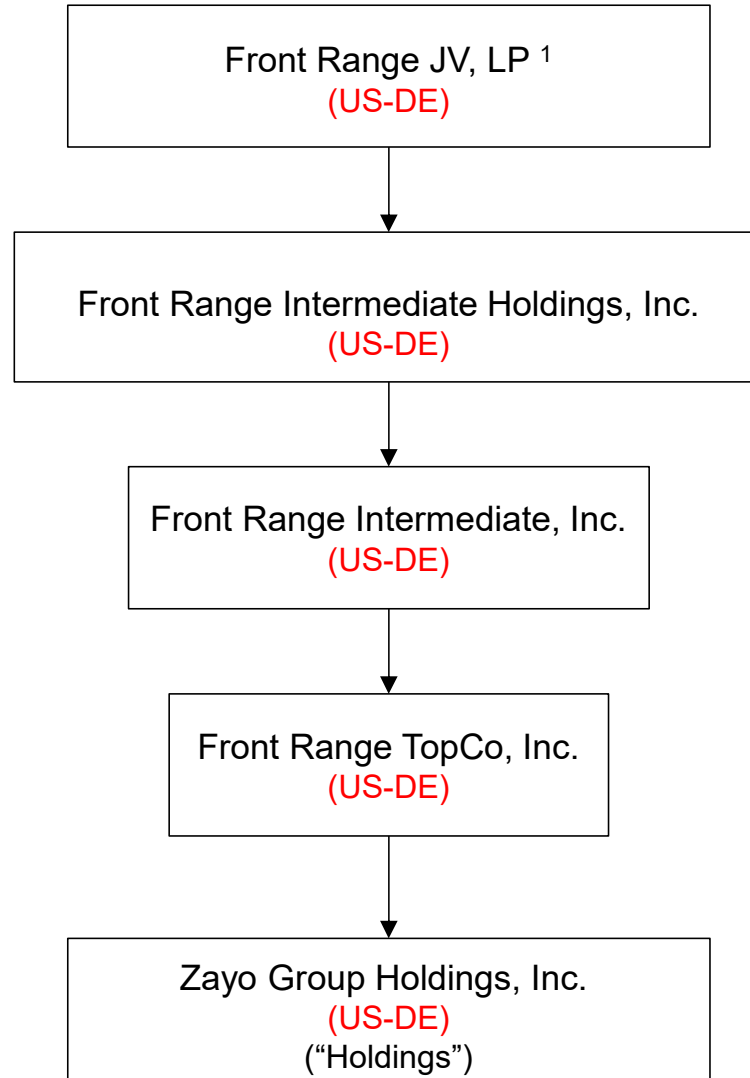
(see Chart 2 for Ownership of Holdings)



**All ownership percentages are 100%.

CORPORATE OWNERSHIP STRUCTURE*
(Chart 2)

*The entities listed include (i) subsidiaries of Holdings that currently provide or may in the future provide intrastate, interstate or international telecommunications services in the United States, and (ii) those entities in their ownership chain. The chart excludes all other subsidiaries of Holdings.



¹ Front Range JV, LP is ultimately majority owned by investment funds affiliated with DigitalBridge Group, Inc. (NYSE: DBRG) and EQT AB, each having approximately 45.3% of Holdings' equity.

(see Chart 1 for Subsidiaries of Holdings)

**All ownership percentages are 100%.

EXHIBIT C

Family Violence Shelter Confidentiality Affidavit

FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AFFIDAVIT

OFFICER OR ATTORNEY/ AGENT:					
COMPANY	Zayo Network Services, LLC				
NAME	Lauren Lantero				
TITLE	Chief Legal Officer & Secretary				
ADDRESS 1	1401 Wynkoop Street				
ADDRESS 2	Suite 500				
CITY	Denver	STATE	Colorado	ZIP CODE	80202

THE INDIVIDUAL NAMED ABOVE (HEREINAFTER, "AFFIANT") PERSONALLY APPEARED BEFORE THE UNDERSIGNED, AN OFFICER DULY AUTHORIZED TO ADMINISTER OATHS. THE AFFIANT, AFTER FIRST BEING DULY SWORN, DEPOSES AND CERTIFIES THAT HE OR SHE HAS READ COMMISSION RULE 515-12-1-.37 FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AND WILL COMPLY WITH THE REQUIREMENTS CONTAINED THEREIN.

THIS AFFIDAVIT SHALL CONSTITUTE THE PLAN FOR PROTECTION OF THE CONFIDENTIALITY OF FAMILY VIOLENCE SHELTERS REQUIRED BY COMMISSION RULE 515-12-1-.37 FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AND O.C.G.A. § 46-5-7.

Lauren Lantero
SIGNATURE OF AFFIANT

7-24-25
DATE

SUBSCRIBED AND SWORN TO ME THIS
 24th DAY OF July, 20 25.
G. Torresani
 NOTARY PUBLIC

State of Colorado
 County of Denver
 (SEAL)

GABRIELA TORRESANI
 Notary Public
 State of Colorado
 Notary ID # 20234006075
 My Commission Expires 02-14-2027

Commission Expiration: 2-14-27

EXHIBIT D

Management Biographies

Steve Smith, Chief Executive Officer

Steve M. Smith is Chief Executive Officer at Zayo. Steve has over 30 years of expertise as a global leader in the technology sector and a deep background in managing and scaling market-leading technology businesses.

Prior to joining Zayo, Steve was a Managing Director at GI Partners, a leading private investment firm. From 2007 to 2018, he served as Chief Executive Officer and President of Equinix, the largest data center company globally. Under his leadership, Equinix grew from \$2 billion to \$34 billion in market value, while revenue increased from \$400 million to \$4.4 billion. Equinix also successfully integrated 21 acquisitions over 10 years representing over \$25 billion in organic and inorganic investments during his tenure. Steve has also held senior leadership roles with HP Services, Lucent Technologies and Electronic Data Systems Corporation.

Steve currently serves on the Board of Directors of Zayo and NextDC, a publicly traded data center company in Australia.

Steve had a successful eight-year career in the U.S. Army where, among other roles, he was aide-de-camp to the office of the Commander in Chief of the U.S. Armed Forces in the Pacific. He graduated from the U.S. Military Academy at West Point and holds a B.S. in Engineering.

Bill Long, Chief Product and Strategy Officer

Bill Long is an experienced telecommunications and technology leader. As Chief Product and Strategy Officer at Zayo, he leads the company's overall product strategy, financials, and roadmap.

Bill has nearly two decades of experience in the telecommunications industry with expertise in interconnection and infrastructure services, enterprise and wholesale voice, and business and product development.

Prior to joining Zayo, Bill served as senior vice president of product management and was responsible for the overall growth and profitability of Equinix Interconnection and Data Center Products globally. Prior to Equinix, he held several roles at Level 3 Communications, including VP of Voice Services, Senior Director of Voice Product Development and Director of Emerging Opportunities.

Brian Daniels, Chief Sales Officer

Brian Daniels serves as Chief Sales Officer at Zayo. In this role, Brian is responsible for uniting sales teams across both direct and channel routes-to-market for Zayo. He leads a team of highly skilled executives responsible for the strategy and growth of Zayo's largest customers and verticals including the most impactful webscale, cloud, carrier and mobile network operators. He also

oversees the growing education sales functions following Zayo's acquisition of Education Networks of America in 2022.

Brian has held a variety of leadership positions at Zayo focused on strategy, finance and product development with an emphasis in metro and long-haul fiber development and mobile infrastructure offerings. Prior to joining Zayo in 2014, Brian worked at Bank of America Merrill Lynch. He also played professional football for the Minnesota Vikings.

Brian holds a Bachelor of Science in business administration from the University of Colorado and an MBA from the University of Louisville. He and his wife Emily also run a non-profit that advocates for lung cancer research.

Bryan Fleming, Chief Information Officer

Bryan Fleming serves as CIO at Zayo. Bryan has an established track record of success and expertise in driving operations, engineering, IT, procurement, and major corporate initiatives at the highest levels of business.

Prior to joining Zayo, Bryan spent 20 years at T-Mobile serving in various technical and engineering roles. Most recently, he served as Senior Vice President of Product and Technology where he led T-Mobile's full technology stack transformation, including steering the company's framework for operational excellence, growing its infrastructure footprint, and integrating state-of-art business processes to drive a hyper-aggressive growth mission. As part of these efforts, Bryan created an enterprise delivery pipeline that increased production deployments by over 900%.

Bryan earned a Bachelor's Degree in Management from Columbia College and an MBA from Auburn University's Harbert College of Business. Bryan also currently serves as a strategic advisor for Lightyear.

Jeff Noto, Chief Financial Officer

Jeff Noto serves as Chief Financial Officer at Zayo overseeing the company's global finance organization, including accounting, operational finance, financial planning and analysis, tax, investor relations, billing, financial reporting, internal audit and treasury.

With over 35 years of experience across financial management, strategy, operations, and analysis, Jeff is a proven financial leader with a track record of delivering impactful business results and building and nurturing high-performance teams. Prior to joining Zayo, Jeff held several executive roles at Verizon, including most recently serving as senior vice president and chief financial officer for the Global Network and Technology (GN&T) and the Verizon Global Services (VGS) organization. In this role, he was responsible for all budgeting, planning, reporting, commercial and capital activities for the Network, IT, and centralized services organization.

Other leadership roles held during his tenure at Verizon included SVP and CFO for Consumer and Mass Business organization; SVP & CFO for Global Media & Telematics; and SVP for the Business Analytics Center of Excellence and Finance Transformation.

Jeff also serves on the Board of the National Children's Alliance (NCA), a not-for-profit providing support, technical assistance, and quality assurance to community-led Children's Advocacy Centers. He has also served as an Adjunct Professor at Seton Hall University's Stillman School of Business.

Jeff holds a bachelor's degree of science in business economics from Rutgers University and a Masters in Accounting from Seton Hall University. He is also a Certified Public Accountant (NJ).

Julie Tschida Brown, Chief People and Culture Officer

Julie Tschida Brown is the Chief People and Culture Officer at Zayo. In this role, she is focused on driving organizational growth, leading transformational change and optimizing results in a dynamic business environment.

Prior to joining Zayo, Julie was the Chief People Officer at Transamerica where she led the Employee Experience team to drive the realization of business objectives and accelerate cultural transformation. Julie has also served in various executive and leadership positions at IHS Markit, Jacobs Engineering, Microsoft, Washington Group International (now AECOM) and Hewitt Associates (now AON).

Julie currently sits on the Board of Directors for Rocky Mountain Human Resources and Strategy Association, where she also serves as Treasurer, and for Healthy Lifestars, a non-profit that aims to motivate and educate kids in underserved areas, to combat childhood obesity and commit to live active, healthy lives. Additionally, she is an executive mentor for MBA students at University of Denver and is a Tocqueville member and volunteer for Mile High United Way.

Julie is a Certified Financial Planner, earned a BA in finance from Iowa State University and a MBA in finance and accounting from University of Minnesota Carlson School of Business.

Lauren Lantero, Chief Legal Officer

Lauren Lantero is the Chief Legal Officer at Zayo. In this role, Lauren oversees all global legal and regulatory functions, including M&A, commercial transactions, litigation, risk management, corporate governance, and underlying rights, and she assists with Zayo's go-to-market strategy.

Lauren joined Zayo in 2018 and has held a variety of leadership positions within the legal organization. Prior to joining Zayo, Lauren was an attorney at a boutique litigation firm and clerked for a district court judge.

Lauren holds a B.S. in accounting from the University of Colorado and a J.D. from the University of Denver.

Nikos Katinakis, Chief Technology Officer

Nikos Katinakis is Zayo's Chief Technology Officer, leveraging over 30 years of leadership experience in technology with a deep understanding of the telecommunication and software industries.

Before joining Zayo, Nikos held the role of Group Executive for Global Networks and Technology at Telstra, the largest telecommunications company in Australia. In this capacity, he spearheaded wireless, fixed, transport and international network strategy, deployment and operations, as well as IT, Data and AI, Cloud, and Cyber Security.

Prior to his tenure at Telstra, Nikos served as the Executive VP at Reliance Jio, the largest communications company in India, contributing to the launch of wireless and fixed networks. He also held the position of SVP at Rogers Communications in Canada, where he was responsible for technology development and cyber for both network and IT. Earlier in his career, Nikos held various senior roles at Ericsson, encompassing sales, product management, software design and systems engineering.

Nikos is a graduate of McGill University in Montreal, holding a B.Eng. in Electrical Engineering and a minor in Management. Beyond his academic achievements, Nikos holds a variety of patents, has actively participated in board positions and advisory roles, contributing to the successful exits of more than four startups. His keen interest lies in the efficient creation of value in the business of technology.

Troy Lupe, Chief Network Officer

J. Troy Lupe serves as Chief Network Officer at Zayo. In this role, he is responsible for and oversees teams dedicated to construction, engineering, field operations, and related support functions.

Troy has over 20 years of leadership experience in telecommunications and technology companies, including having most recently served as Chief Operating Officer for New Era Technology and VP of Field Operations for Comcast Cable before joining Zayo in December 2021.

Troy is a results-driven and customer-focused technical operations professional with a reputation for surpassing productivity and quality objectives. He is known as a team motivator and has expertise in implementing best-practice operational processes and aligning business operations.

Troy earned a Master of Science in Management of Technology from the University of Minnesota. He also holds Bachelor of Science Degrees in Business Management and Marketing.

Alan Heckler, Chief Innovation & Integration Officer

Alan Heckler serves as Executive Vice President and Chief Innovation & Integration Officer at Zayo Group. In this role, Alan is responsible for leading business-wide transformation efforts,

bringing together strategy, operations, and technology to drive growth and innovation — including integrating Zayo's acquisition of Crown Castle's fiber assets.

With more than 25 years of combined industry and consulting experience, Alan brings a deep background in digital infrastructure, industrial transformation, and M&A strategy.

Prior to joining Zayo, Alan was a Senior Partner at Kearney, where he led the Americas Industrial Product Practice and served on the Americas Leadership Team. Under his leadership, the practice doubled in size while becoming one of the firm's largest and most profitable business units. His work has spanned industries including communications, media, technology, aerospace, defense, and infrastructure, specializing in large-scale transformation and value creation initiatives.

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

TRADE SECRET EXHIBIT E

Financial Statements

[PUBLIC DISCLOSURE DOCUMENT]

[Redacted]

**STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

Application of

Zayo Network Services, LLC

for a Certificate of Authority to Provide
Competitive Local Exchange
Telecommunications Services

Docket No. _____

REQUEST FOR TRADE SECRET TREATMENT

Pursuant to Rule 515-3-1-.11, Zayo Network Services, LLC (“Applicant”) respectfully requests that the Georgia Public Service Commission (“Commission”) grant protection from public disclosure and afford trade secret treatment to **TRADE SECRET Exhibit E, “Financial Statements,”** (the “Trade Secret Exhibit”) to the Application. Applicant requests that the Commission afford the highest level of protective treatment to the Trade Secret Exhibit and ask that it be made available only to the Commission.

Applicant requests trade secret treatment of the Trade Secret Exhibit because it contains information that is trade secret, confidential, and proprietary in nature. The information contained therein describes the financial condition of Applicant’s indirect parent, Zayo Group Holdings, Inc. (“Parent” and together with its subsidiaries including Applicant, “Zayo”). Applicant and Parent are not publicly held companies and derive economic value from this information because it is not known to others. If released, the information in the Trade Secret Exhibit could be used by competitors of Zayo to cause competitive harm. The information in the Trade Secret Exhibit thus constitutes trade secrets within the meaning of O.C.G.A. § 10-1-761(4).

Applicant will compete for customers with telecommunications companies and other entities operating within the State of Georgia. Applicant is a privately held company and Parent’s

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

revenues, operating expenses and asset value are highly confidential and not publicly available. Further, Applicant operates in a highly competitive market segment. Release of the information would provide competitors with valuable market information relating to Applicant and could disadvantage Applicant by giving competitors insight into Applicant's ability to compete. Further, release of financial information, including revenue estimates, would substantially harm Applicant's ability to negotiate with vendors, incumbent local exchange carriers, and other local and interexchange carriers for services and equipment. The release of this information would also harm Applicant's relationship with investors.

Applicant maintains the secrecy of the information contained within the Trade Secret Exhibit to the Application by retaining possession and control of the information, and by not disclosing such information to others not subject to confidentiality restrictions.

Protection of the financial information provided in the Trade Secret Exhibit does not affect the public interest and does not restrict interested parties from participating in the administrative process. Furthermore, the harm that would result from disclosure of this information far outweighs the public interest in accessing this information.

Applicant is submitting the Trade Secret Exhibit to the Application to the Commission under protective seal with the designation "TRADE SECRET" prominently displayed on each page. Because the Trade Secret Exhibit constitutes protected trade secret information in its entirety, a redacted public disclosure version of said exhibit is not being submitted. Accordingly, and for the foregoing reasons, Applicant respectfully requests that the Commission afford trade secret protections to the Trade Secret Exhibit. In the event that this request is denied, please provide the undersigned with notice of that determination prior to making the Trade Secret Exhibit available to the public. Applicant further requests that the Commission stay the release of the Trade Secret

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Exhibit until such time as an application for review of the determination is resolved. Disclosure without affording Applicant an opportunity to contest a finding against trade secret treatment would prejudice Applicant and render moot any successful appeal.

Respectfully submitted July 24, 2025.

/s/ Patricia Cave

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Counsel for Zayo Network Services, LLC

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

Application of

Zayo Network Services, LLC

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Docket No. _____

AFFIDAVIT

STATE OF COLORADO)
)
COUNTY OF DENVER)

I, Lauren Lantero, being of full age and duly sworn according to law, state as follows:

1. I am the Chief Legal Officer and Secretary of Zayo Network Services, LLC (“Applicant”), the Applicant in the above-captioned matter, and its parent company, Zayo Group Holdings, Inc. (“Parent” and together with its subsidiaries including Applicant, “Zayo”).

2. I make this affidavit in support of the Request for Trade Secret Treatment (“Request”) in accordance with Georgia Public Service Commission Utility Rule 515-3-1-.11.

3. In support of the Application, Applicant is providing as Trade Secret Exhibit E financial information of Parent (“Trade Secret Exhibit”), which contains confidential, proprietary, non-public information that Applicant designates as trade secret and protected information pursuant to O.C.G.A. § 10-1-761(4).

4. The information in the Trade Secret Exhibits is protected by Applicant, by making it available only to the senior management of, and the outside accounting and legal professionals retained by, Applicant.

5. To the extent this information has been or may be disclosed to others, Applicant has done so or will do so by way of a confidentiality agreement, whereby it is agreed by the parties thereto that the trade secret and confidential information: (i) shall be used solely for purposes relating to the matter specified therein, and (ii) shall be maintained in secure files, separate from public information. Such agreements provide that no other disclosure shall be made to any person or entity, except with the express written consent of Applicant or its legal counsel.

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6. The information in the Trade Secret Exhibit is not contained in materials that are routinely available to the general public, including but not limited to, Board Orders, press releases, copies of speeches, promotional or educational materials.

7. The Trade Secret Exhibit contains financial and business information that is critical, commercially sensitive, and competitively significant. Because of the competition for telecommunications services, Applicant believes that disclosure of this information would place it at a significant competitive disadvantage, impede full and fair competition, and undermine Applicant's business plans. Unrestricted availability of this information would provide competitors or potential competitors with information regarding Applicant's operations and financial condition, upon which competitors or potential competitors could evaluate Applicant's network and business strategies, to its detriment. Such availability would disclose the nature and details of Applicant's financial resources and arrangements and the current extent of its operations and would ultimately result in a competitive disadvantage to Applicant. In contrast, trade secret treatment will not adversely affect any interested party. Trade secret treatment of the Trade Secret Exhibit is therefore required to avoid commercial and competitive injury.

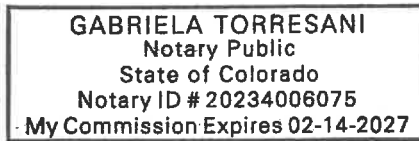
8. I further adopt and verify the factual statements made in the Request are true and correct to the best of my knowledge, information and belief.

~~State~~
State of Colorado
County of Denver
Sworn and subscribed to before me this
24th day of July, 2025.

Gabriela Torresani
Notary Public

By:

Lauren Lantero
Lauren Lantero



Commission expiration: 2-14-27