Troutman Pepper Locke LLP
401 9th Street, N.W., Suite 1000
Washington, D.C. 20004

troutman.com

Jeff Strenkowski
D 202.274.1907
jeff.strenkowski@troutman.com

Victor M. Noriega
D 404.885.3037
victor.noriega@troutman.com

February 19, 2026

VIA FEDEX AND ELECTRONIC FILING

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

Re: LTS Telecommunications Services (USA) Inc. - Application for Certificate of Authority to Offer Competitive Local Exchange Service (CLEC)

Dear Ms. Tanner:

Enclosed with this letter is LTS Telecommunications Services (USA) Inc.'s ("Applicant's") application for a certificate of authority to offer competitive local exchange service in Georgia ("Application").

Pursuant to GA. Comp. R. & Regs. r. 515-3-1.11, Applicant respectfully requests trade secret protection of **TRADE SECRET Exhibit E, "Financial Statements"** (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.

If you have any questions or need further information, please feel free to contact Victor Noriega at 404-885-3037 or Victor.Noriega@troutman.com.

Respectfully submitted,

/s/ Jeff Strenkowski

/s/ Victor M. Noriega

TRADE SECRET STATUS AFFIDAVIT
GEORGIA PUBLIC SERVICE COMMISSION
LTS TELECOMMUNICATIONS SERVICES (USA) INC.
APPLICATION FOR CERTIFICATE OF AUTHORITY TO
PROVIDE COMPETITIVE LOCAL EXCHANGE SERVICE (CLEC)

All documents, data, letters, and generated information received by the State constitutes a "public record" and is subject to disclosure under the Georgia Open Records Act ("GORA"). O.C.G.A. § 50-18-70 *et seq.* However, pursuant to O.C.G.A. § 50-18-72(a)(34), "[an] entity submitting records containing trade secrets that wishes to keep such records confidential under this paragraph shall submit and attach to the records an affidavit affirmatively declaring that specific information in the records constitute trade secrets pursuant to Article 27 of Chapter 1 of Title 10 [O.C.G.A. § 10-1-760 et seq.]."

O.C.G.A. § 10-1-761(4) defines "Trade secret" as "…information, without regard to form, including, but not limited to, technical or nontechnical data, a formula, a pattern, a compilation, a program, a device, a method, a technique, a drawing, a process, financial data, financial plans, product plans, or a list of actual or potential customers or suppliers which is not commonly known by or available to the public and which information:

A. Derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and

B. Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

Therefore, the information listed below and attached hereto, that are submitted with LTS Telecommunications Services (USA) Inc.'s (the "Applicant") application to the Georgia Public Service Commission for a Certificate of Authority to Provide Competitive Local Exchange Service (CLEC) (the "Application") are marked as trade secret pursuant to O.C.G.A. § 10-1-761 (4) and Ga. Comp. R & Regs. 515-3-1-.11:

1. The entirety of Trade Secret Exhibit E to the Application, "Financial Statements."

The foregoing information in the Application shall be marked as trade secret and withheld from the Georgia Open Records Act because:

1. It includes business and financial information that is trade secret confidential, sensitive, and proprietary;

2. Applicant would suffer economic and competitive disadvantage if other persons who can obtain economic value from its disclosure access this information, which is not readily ascertainable by proper means; and

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3. Applicant and its affiliated entities have taken steps to maintain this type of information as trade secret, including by not publishing this information publicly and filing it as trade secret/confidential in similar certificate of authority applications in other states.

Under penalty of perjury, acknowledging that O.C.G.A. §16-10-71 provides a penalty of a fine of up to $1,000 and potential imprisonment of one to five years, I attest that the specific information in the records listed above constitutes trade secrets pursuant to O.C.G.A. § 10-1-761(4), and request that the State of Georgia and the Georgia Public Service Commission not disclose this protected information under GORA and Ga. Comp. R & Regs. 515-3-1-.11.

Signature:

Michael Murray
_____

Michael Murray
Senior Vice President, Operations, US Infrastructure
LTS Telecommunications Services (USA) Inc.
Date: 11/04/2025

State of Texas
County of Tarrant
SUBSCRIBED AND SWORN TO ME THIS 4th DAY OF November 2025.

Notary Now
Electronic Signature of Kim Beck, Texas Notary

ID#131290253 EXP 10/12/2029 STATE OF TEXAS NOTARY PUBLIC KIM BECK

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

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

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.

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

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	LTS Telecommunications Services (USA) Inc.				
ADDRESS 1	6405 Mira Mesa Blvd.				
ADDRESS 2	Suite 200				
CITY	San Diego	STATE	California	ZIP CODE	92121
TELEPHONE	858-527-6400	FAX	858-527-6464		

EMPLOYEE DESIGNATED TO RECEIVE AND RESPOND TO COMMISSION REQUESTS:					
NAME	Gale Williams	TITLE	Director, Business Operations, US Infrastructure		
ADDRESS 1	PO Box 12770				
ADDRESS 2					
CITY	Lexington	STATE	Kentucky	ZIP CODE	40583
TELEPHONE	859-286-8114	FAX	N/A		
EMAIL ADDRESS	Gale.williams@ledcor.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.

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	Victor Noriega				
NAME OF FIRM	Troutman Pepper Locke LLP				
ADDRESS 1	600 Peachtree Street NE				
ADDRESS 2	Suite 3000				
CITY	Atlanta	STATE	Georgia	ZIP CODE	30308
TELEPHONE	404-885-3037	FAX	N/A		
EMAIL ADDRESS	Victor.noriega@troutman.com				

III. ORGANIZATION

STATE AND DATE OF INCORPORATION:			
STATE	Delaware	DATE	November 7, 2017

LIST THE NAMES, TITLES, AND ADDRESSES (IF DIFFERENT FROM ABOVE) OF ALL OFFICERS OR PARTNERS:			
NAME	Jimmy Byrd	ADDRESS	14400 The Lakes Blvd. Suite 100, Building C Pflugerville, TX, USA 78660
TITLE	Executive Vice President, Corporate Development		
NAME	John Kump	ADDRESS	1500 - 1067 West Cordova Street Vancouver, BC, Canada V6C 1C7
TITLE	Executive Vice President and Chief Financial Officer		
NAME	Iain Morris	ADDRESS	1500 - 1067 West Cordova Street Vancouver, BC, Canada V6C 1C7
TITLE	Executive Vice President, Ledcor Technical Services		
NAME	Thomas Lofaro	ADDRESS	6405 Mira Mesa Blvd., Suite 200 San Diego, CA, USA 92121
TITLE	Chief Legal Officer and Corporate Secretary		
NAME	Ashwin Chitamun	ADDRESS	6405 Mira Mesa Blvd., Suite 200 San Diego, CA, USA 92121
TITLE	Senior Vice President, Business Development		
NAME	Farran Hobbs	ADDRESS	1500 - 1067 West Cordova Street Vancouver, BC, Canada V6C 1C7
TITLE	Senior Vice President, Services and Operations		

NAME	Michael Murray	ADDRESS	14400 The Lakes Blvd. Suite 100, Building C Pflugerville, TX, USA 78660
TITLE	Senior Vice President, Operations, US Infrastructure		
NAME	Harminder Gill	ADDRESS	1500 - 1067 West Cordova Street Vancouver, BC, Canada V6C 1C7
TITLE	Senior Vice President, Strategy and Business Development		
NAME	Benjamin Martin	ADDRESS	1500 - 1067 West Cordova Street Vancouver, BC, Canada V6C 1C7
TITLE	Senior Vice President, Finance and Risk Management		
NAME	Christopher Wales	ADDRESS	1500 - 1067 West Cordova Street Vancouver, BC, Canada V6C 1C7
TITLE	Vice President, Taxation		

ATTACH A COPY OF THE CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS ISSUED BY THE GEORGIA SECRETARY OF STATE. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., “EXHIBIT A”).	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. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., “EXHIBIT A”). IF NO AFFILIATED COMPANIES, SO STATE.	Exhibit B

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		NO	X

IF YES, PLEASE LIST THE NAME OF EACH COMPANY AND THE CERTIFICATE NUMBER(S):

However, LTS Telecommunications Services (USA) Inc. was previously certified in Georgia (IXC License No. 41891; CLEC License No. 41892), and voluntarily canceled its license in 2023 due to business reasons.

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	

IF YES, PLEASE LIST THE NAME OF EACH COMPANY AND THE STATE OR FEDERAL ENTITY THAT GRANTED SUCH AUTHORITY:

Applicant is certified to offer telecommunications services in Texas, Illinois, Minnesota, North Dakota, South Dakota, Nebraska, Indiana, Wisconsin, Iowa, Wyoming, Arkansas, Louisiana, Ohio, and Montana. Applicant's affiliate, LTS Telecom Services (EAST) LLC (same address as Applicant), is certified to offer telecommunications service in Virginia, Maryland, and Oregon.

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		NO	X

IF YES, PLEASE LIST THE NAME OF EACH COMPANY AND THE STATE OR FEDERAL THAT REVOKED SUCH AUTHORITY:

N/A

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	

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	
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			

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	

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	

DOES THE APPLICANT AGREE TO COMPLY WITH ALL OTHER APPLICABLE COMMISSION RULES AND ORDERS? (PLACE AN "X" IN THE APPROPRIATE BOX.)	YES	X	NO	

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	

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

Applicant does not currently plan to construct facilities in Georgia but seeks authority to do so should it determine in the future that it needs to undertake such construction activities.

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

PROVIDE A BREAKDOWN OF ANTICIPATED COSTS OF FACILITIES.

Because Applicant does not currently plan to construct facilities in Georgia, Applicant does not have a cost breakdown of the costs of facilities involved in Georgia.

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
IF YES, PLEASE ATTACH A LOCAL EXCHANGE SERVICES TARIFF. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").				
IF NO, PLEASE PROVIDE THE WEB ADDRESS WHERE THE APPLICANT'S GEORGIA TARIFFS OR PRICE GUIDES MAY BE FOUND.	www.Ledcor.com			

PURSUANT TO O.C.GA. § 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").				

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

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. PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., "EXHIBIT A").	Trade Secret Exhibit E

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.):
N/A

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IX. AFFIDAVIT

OFFICER OR ATTORNEY/ AGENT:					
NAME	Michael Murray				
TITLE	Senior Vice President, US Infrastructure				
ADDRESS 1	14400 The Lakes Blvd.				
ADDRESS 2	Suite 100, Building C				
CITY	Pflugerville	STATE	Texas	ZIP CODE	78660

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.

Michael Murray

SIGNATURE OF AFFIANT

11/04/2025

DATE

State of Texas
County of Tarrant
SUBSCRIBED AND SWORN TO ME THIS 4th
DAY OF November 2025.

Notary Now

Electronic Signature of Kim Beck, Texas Notary

ID#131290253 EXP 10/12/2029 STATE OF TEXAS NOTARY PUBLIC KIM BECK

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

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EXHIBIT LIST

EXHIBIT A	**CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS IN GEORGIA**
EXHIBIT B	**ORGANIZATIONAL CHART**
EXHIBIT C	**FAMILY VIOLENCE SHELTER CONFIDENTIALLY PROTECTION AFFIDAVIT**
EXHIBIT D	**PROFILES OF APPLICANT'S MANAGEMENT TEAM**
TRADE SECRET EXHIBIT E	**FINANCIAL STATEMENTS [TRADE SECRET – FILED UNDER SEAL]**

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

EXHIBIT A

CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS IN GEORGIA

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

Control Number : 18027578

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, **Brian P. Kemp**, the Secretary of State and the Corporation Commissioner of the State of Georgia, hereby certify under the seal of my office that

LTS Telecommunications Services (USA) Inc.
a **Foreign Profit Corporation**

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 Profit Corporation** in this state.

WHEREFORE, by the authority vested in me as Secretary of State, the above **Foreign Profit Corporation** is hereby granted, on **03/02/2018**, 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 **03/06/2018**.

Brian P. Kemp
Secretary of State

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

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Brian P. Kemp
Secretary of State

OFFICE OF SECRETARY OF STATE
CORPORATIONS DIVISION
2 Martin Luther King Jr. Dr. SE
Suite 313 West Tower
Atlanta, Georgia 30334
(404) 656-2817
sos.georgia.gov/corporations

APPLICATION FOR CERTIFICATE OF AUTHORITY FOR FOREIGN PROFIT OR NONPROFIT CORPORATION

IMPORTANT: Please provide the entity's primary email address when completing this form.
Primary Email Address: karen.graham@ledcor.com

NOTICE TO APPLICANT: PRINT PLAINLY OR TYPE REMAINDER OF THIS FORM

1. LTS Telecommunications Services (USA) Inc.
Name of Corporation — Name Reservation Number (Optional)

Date business commenced (or proposed to commence) in Georgia: June 1, 2018
(NOTE: (1) Profit Corporations: If the date provided here is more than 30 days prior to the effective date of this application, a $500 penalty must be paid. Penalty is statutory and cannot be waived by Secretary of State. (2) Nonprofit Corporations: There is no late filing penalty.)

2. Corporation Service Company
Name of Filing Person
251 Little Falls Drive — DE — 19808
Address — City — State — Zip Code
compliancemail@cscglobal.com — 800-927-9801
Filer's Email Address — Telephone Number

3. 6405 Mira Mesa Blvd., Suite 100 — San Diego — CA — 92121
Principal Office Mailing Address (may be P.O. Box) — City — State — Zip Code

4. Corporation Service Company — sop@cscglobal.com
Name of Registered Agent in Georgia — Registered Agent's Email Address
40 Technology Pkwy South, #300
Registered Office Street Address in Georgia (post office box or mail drop not acceptable for registered office address)
Norcross — Gwinnett — GA — 30092
City — County — State — Zip Code

5. LTS Telecommunications Services (USA) Inc.
Corporation's Name in State or Country of Incorporation (Must match name on certificate of existence)

Check ONE: [✓] PROFIT [ ] NONPROFIT
Jurisdiction (Home State or Country): Delaware
Date of Incorporation in Home Jurisdiction: 11/07/2017

6.

Jimmy Byrd/President	14400 The Lakes Blvd, Ste 100, Bldg C	Pflugerville	TX	78660
Officer / CEO	Address	City	State	Zip Code
Jim Logan/CFO	1200-1067 West Cordova St	Vancouver, Canada	BC	V6C 1C7
Officer / CFO	Address	City	State	Zip Code
Thomas Lofaro/Secretary	6405 Mira Mesa Blvd., Ste 100	San Diego	CA	92121
Officer / Secretary	Address	City	State	Zip Code

SEE ATTACHED FOR FOLLOWUP OF OFFICERS

7. Effective Date: (Choose one) [✓] Upon filing [ ] Delayed effective date and/or time: _____
(A delayed effective date must be within 90 days of the filing date.)

8. NOTICE: Mail the following items to the Secretary of State at the above address.
(1) This application;
(2) An ORIGINAL certificate of existence or good standing, not more than 90 days old, certified by the home state or country. (Certificate from home state may not be more than 90 days old; copy of articles of incorporation from home state should NOT be submitted.); and
(3) Filing fee of $225.00 payable to "Secretary of State." Filing fees are non-refundable.
(4) If applicable, a copy of the resolution of the board of directors, certified by corporation's secretary, adopting a fictitious or trade name.

Karen Graham
Signature of Authorized Person — Date: March 1, 2018

Karen Graham
Print name — Title: Assistant Corporate Secretary

FORM 236
(Rev. 12/2017)

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

LTS Telecommunications Services (USA) Inc.
LIST OF OFFICERS DIRECTORS
as of March 1, 2018

NAME	TITLE	DIRECTOR	ADDRESS
Jimmy Byrd	President	YES	14400 The Lakes Blvd, Ste 100, Bldg C, Pflugerville, TX 78660
Iain Morris	COO		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
Jim Logan	EVP & CFO		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
John Kump	SVP, Finance		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
Thomas Lofaro	SVP, Gen Csl (US Ops) & Corporate Secretary	YES	6405 Mira Mesa Blvd, Ste 100, San Diego, CA 92121
Trent Edwards	SVP, US Field Ops	YES	14400 The Lakes Blvd, Ste 100, Bldg C, Pflugerville, TX 78660
Harminder Gill	SVP, Strategy & Development		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
Ashwin Chitamun	SVP, Business Development		6405 Mira Mesa Blvd, Ste 100, San Diego, CA 92121
Benjamin Martin	VP & Corporate Controller		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
Farran Hobbs	VP, Finance		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
Christopher Wales	VP, Taxation		1200-1067 West Cordova St, Vancouver, BC, Canada V6C 1C7
Karen Graham	Assistant Corporate Secretary		6405 Mira Mesa Blvd, Ste 100, San Diego, CA 92121

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

Delaware

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "LTS TELECOMMUNICATIONS SERVICES (USA) INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FIRST DAY OF MARCH, A.D. 2018.

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

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

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

Jeffrey W. Bullock, Secretary of State

6607436 8300

SR# 20181632332

Authentication: 202239451

Date: 03-01-18

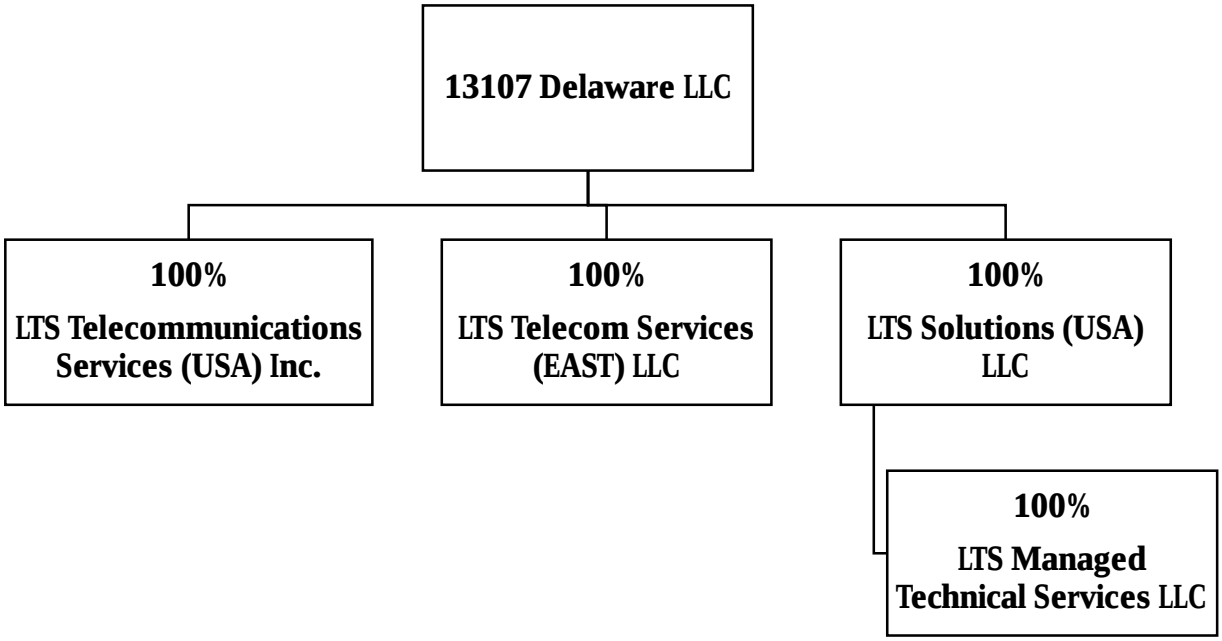
You may verify this certificate online at corp.delaware.gov/authver.shtml

PUBLIC DISCLOSURE DOCUMENT – TRADE SECRET INFORMATION REDACTED

EXHIBIT B

ORGANIZATIONAL CHART

Applicant is wholly owned by 13107 Delaware LLC, a Delaware limited liability company. Below is Applicant's organizational chart.



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EXHIBIT C

FAMILY VIOLENCE SHELTER CONFIDENTIALLY PROTECTION AFFIDAVIT

Georgia Public Service Commission

244 WASHINGTON STREET, SW
ATLANTA, GEORGIA 30334-5701

FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AFFIDAVIT

Pursuant to Commission Rule 515-12-1-.37 Family Violence Shelter Confidentiality Protection, all telephone service and directory assistance providers must file an affidavit attesting to compliance with the rule upon certification and by January 31 of each odd-numbered year thereafter.

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

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

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

Pactima eNotary (RON) Package ID: 2SxEavcICpQPWsxVRphpQ / Document ID: [4] lBi8z9kNSuH7rqd7Afv5i

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FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AFFIDAVIT

OFFICER OR ATTORNEY/ AGENT:					
COMPANY	LTS Telecommunications Services (USA) Inc.				
NAME	Michael Murray				
TITLE	Senior Vice President, US Infrastructure				
ADDRESS 1	14400 The Lakes Blvd.				
ADDRESS 2	Suite 100, Building C				
CITY	Pflugerville	STATE	Texas	ZIP CODE	Texas

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.

Michael Murray
SIGNATURE OF AFFIANT

11/04/2025
DATE

State of Texas
County of Tarrant
SUBSCRIBED AND SWORN TO ME THIS 4th DAY OF November 2025.

Notary Now
Electronic Signature of Kim Beck, Texas Notary

ID#131290253 EXP 10/12/2029 STATE OF TEXAS NOTARY PUBLIC KIM BECK

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

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EXHIBIT D

PROFILES OF APPLICANT'S KEY MANAGEMENT TEAM

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

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

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

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

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

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

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

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

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

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

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

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

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TRADE SECRET EXHIBIT E

FINANCIAL STATEMENTS

[Redacted]