PUBLIC - TRADE SECRET INFORMATION EXTRACTED

Morgan Lewis

Danielle Burt
Case Smith
danielle.burt@morganlewis.com
case.smith@morganlewis.com

November 6, 2026

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 Vero Networks ABS, LLC for a Certificate of Authority to Provide Competitive Local Exchange Service

Dear Ms. Tanner:

On behalf of Vero Networks ABS, 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 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/ Danielle Burt
Danielle Burt
Case Smith

Counsel for Vero Networks ABS, LLC

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

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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 - TRADE SECRET INFORMATION EXTRACTED

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	Vero Networks ABS, LLC ("Applicant")				
ADDRESS 1	3575 Ringsby Court				
ADDRESS 2	Suite 200				
CITY	Denver	STATE	CO	ZIP CODE	80216
TELEPHONE	(800) 691-8376	FAX			

EMPLOYEE DESIGNATED TO RECEIVE AND RESPOND TO COMMISSION REQUESTS:					
NAME	Chris Pietila	TITLE	General Counsel		
ADDRESS 1	1580 N Logan St.				
ADDRESS 2	Suite 660 – PMB 613180				
CITY	Denver	STATE	CO	ZIP CODE	80203
TELEPHONE	303-350-4060	FAX			
EMAIL ADDRESS	cpietila@veronetworks.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					
NAME OF FIRM	Corporation Service Company				
ADDRESS 1	2 Sun Court				
ADDRESS 2	Suite 400				
CITY	Peachtree Corners	STATE	Georgia	ZIP CODE	30092
TELEPHONE		FAX			
EMAIL ADDRESS					

III. ORGANIZATION

STATE AND DATE OF INCORPORATION:			
STATE	Delaware	DATE	June 9, 2026

LIST THE NAMES, TITLES, AND ADDRESSES (IF DIFFERENT FROM ABOVE) OF ALL OFFICERS OR PARTNERS:			
NAME	Matt Erickson	ADDRESS	All of Applicant's listed officers may be reached at Applicant's address provided above.
TITLE	Chief Executive Officer		
NAME	Greg Friedman	ADDRESS	
TITLE	Chief Financial Officer		
NAME	Pamela Moore	ADDRESS	
TITLE	Chief Operating Officer		
NAME	Gregg Strumberger	ADDRESS	
TITLE	Chief Legal Officer		
NAME	Roger Greene	ADDRESS	
TITLE	Chief Commercial Officer		

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.	EXHIBIT B

PLACE EXHIBIT NAME IN BOX TO RIGHT (e.g., “EXHIBIT A”). IF NO AFFILIATED COMPANIES, SO STATE.	

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	

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

In Georgia, Applicant's affiliates TEC of Jackson, Inc. ("TEC of Jackson") and Vero Fiber Networks, LLC ("Vero Fiber") are authorized to provide intrastate telecommunications services.

TEC of Jackson is authorized to provide resold interexchange services pursuant to Certificate No. R-1038 issued by the Commission in Docket No. 25679 on October 9, 2007 on an interim basis, which became final on November 24, 2008.[1]

Vero Fiber is authorized as a competitive local exchange carrier pursuant to Certificate of Authority L-0576 issued by the Commission in Docket No. 51725 on an interim basis on February 9, 2018, which was amended to remove interim status on February 28, 2023.

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 authorized to provide intrastate telecommunications services in: Colorado, Florida, Indiana, Iowa, Missouri, Montana, New Mexico, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, and Texas. Applicant has applications pending for authorization to provide intrastate telecommunications services in Arkansas, Illinois, and North Carolina.

- **Bay Springs Telephone Co., Inc.**: FCC and Mississippi.
- **Clearnetworx, LLC**: Colorado and New Mexico.
- **Crockett Telephone Co., Inc.**: FCC and Tennessee.
- **FastTrack Communications, Inc.**: Colorado and New Mexico.
- **Montana Sky Networks, Inc.**: Montana.
- **National Telephone of Alabama, Inc.**: FCC and Alabama.
- **Peoples Telephone Company**: FCC and Tennessee.
- **Roanoke Telephone Co., Inc.**: FCC and Alabama.
- **TEC of Jackson, Inc.**: FCC, Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, and Tennessee.
- **Vero Broadband, LLC**: Arizona, Colorado, Iowa, Montana, New Mexico and Oregon.
- **Vero Fiber ABS, LLC**: Alabama, Colorado, Iowa, Mississippi, Montana, New Mexico, Oregon, Tennessee, and Texas.
- **Vero Fiber Networks, LLC**: Arkansas, Arizona, California, Colorado, Florida, Georgia, Hawaii, Iowa, Illinois, Indiana, Kentucky, Kansas, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Montana, Nevada, New Mexico, North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, Washington, West Virginia, and Wisconsin.
- **West Tennessee Telephone Co., Inc.**: FCC and Tennessee.

1 The Certificate was originally issued to CommuniGroup of Jackson, Inc. ("CommuniGroup of Jackson") in the above-referenced docket. CommuniGroup of Jackson subsequently changed its name to TEC of Jackson and filed an application with the Commission requesting that change on January 6, 2009, which the Commission approved on January 22, 2009 in the above-referenced docket.

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:				
None.				
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)	X
	Wholesale (e.g., carriers and providers)	

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	
	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 one of Applicant's affiliates, 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"). A separate filing regarding the *Pro Forma* Asset Transfer will be filed.

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, including those assigned by Vero Fiber after Applicant is certificated. Applicant may also acquire facilities through lease or purchase.

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

Applicant intends to provide services primarily using its own facilities throughout the state of Georgia, which will be acquired from Applicant's affiliate Vero Fiber 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 may deploy facilities based on specific customer and service needs.

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.	https://www.verofiber.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.):

Not applicable.

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IX. AFFIDAVIT

OFFICER OR ATTORNEY/ AGENT:					
NAME	Chris Pietila				
TITLE	General Counsel				
ADDRESS 1	1580 N Logan St.				
ADDRESS 2	Suite 660 – PMB 613180				
CITY	Denver	STATE	CO	ZIP CODE	80203

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

10/29/2026
DATE

SUBSCRIBED AND SWORN TO ME THIS
29th DAY OF October, 2026.

NOTARY PUBLIC

(SEAL)

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

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

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**]

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

EXHIBIT A

Certificate of Authority to Transact Business

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

Control Number : 26159552

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

Vero Networks ABS, 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 **07/17/2026**, 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 **07/24/2026**.

Brad Raffensperger

Brad Raffensperger
Secretary of State

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APPLICATION FOR CERTIFICATE OF AUTHORITY

Electronically Filed
Secretary of State
Filing Date: 7/17/2026 3:41:46 PM

BUSINESS INFORMATION

CONTROL NUMBER	26159552
BUSINESS NAME	Vero Networks ABS, LLC
BUSINESS TYPE	Foreign Limited Liability Company
EFFECTIVE DATE	07/17/2026
HOME JURISDICTION	Delaware
DURATION	Perpetual
NAME IN HOME STATE	Vero Networks ABS, LLC
DATE OF FORMATION IN HOME JURISDICTION	06/09/2026
COMMENCEMENT DATE IN GEORGIA	07/17/2026

PRINCIPAL OFFICE ADDRESS

ADDRESS	3575 Ringsby Court, Ste 320, Denver, CO, 80216, USA

RECORDS ADDRESS

ADDRESS	3575 Ringsby Court, Ste 320, Denver, CO, 80216, 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
Vero Funding, LLC	MANAGER	3575 Ringsby Court, Ste 320, Denver, CO, 80216, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE	Gregg Strumberger
AUTHORIZER TITLE	Attorney In Fact

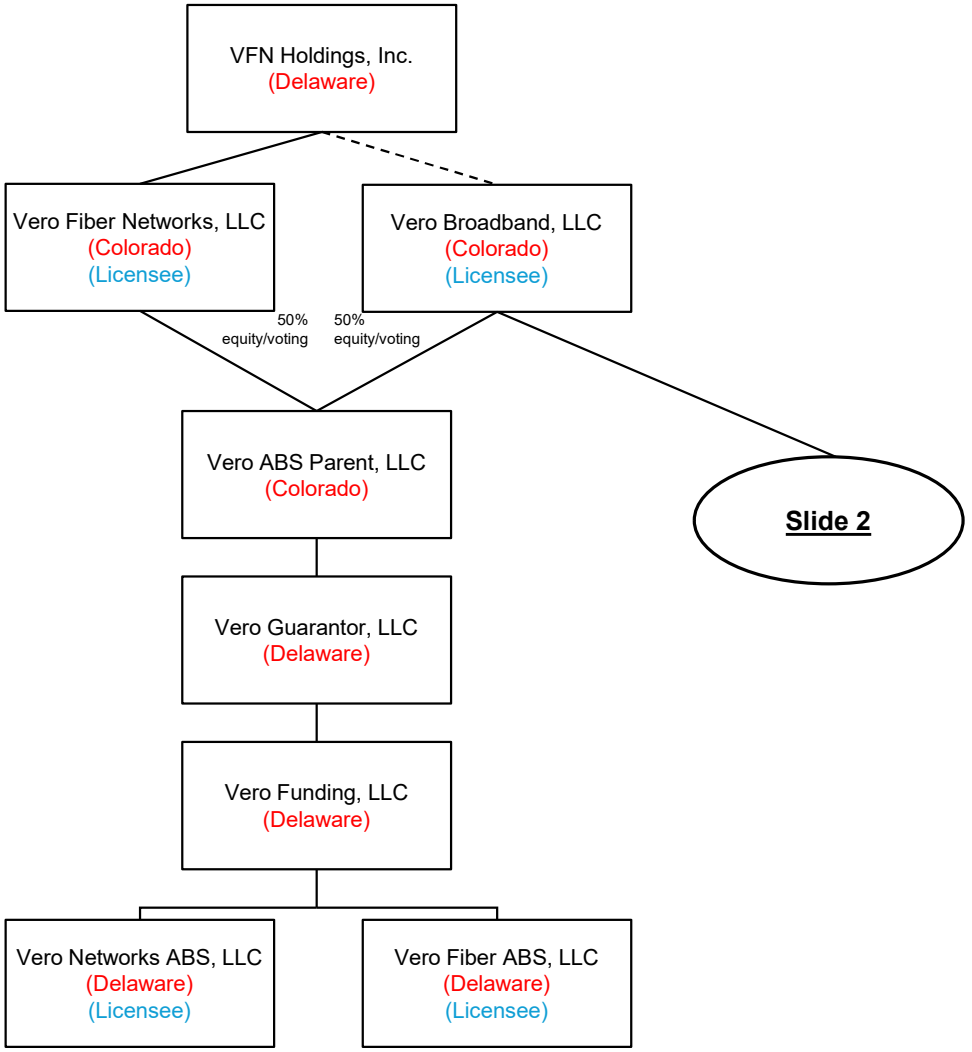
The foreign limited liability company undertakes to keep its records at the address shown above until its registration in Georgia is canceled or withdrawn. The foreign limited liability company, in accordance with Title 14 of the Official Code of Georgia Annotated, appoints the Secretary of State as 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.

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EXHIBIT B

Corporate Structure Chart

Organizational Chart (Slide 1)

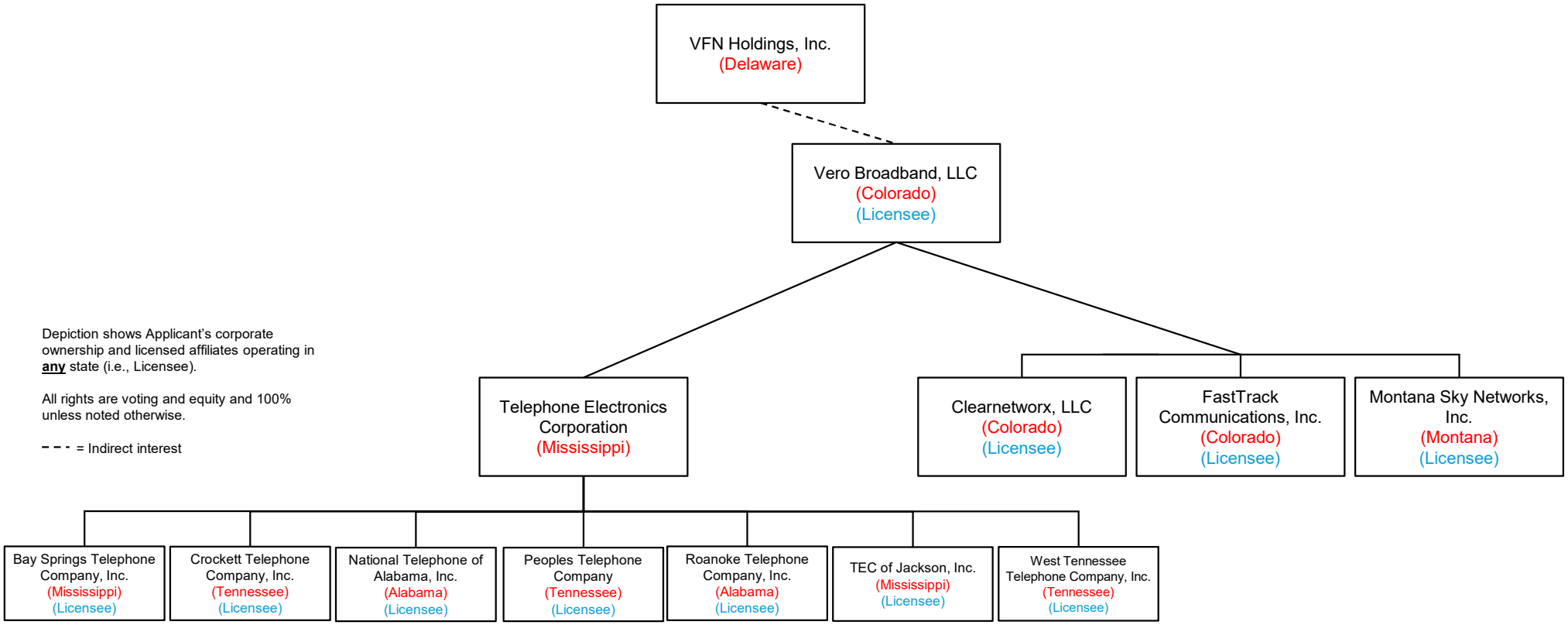


Depiction shows Applicant's corporate ownership and licensed affiliates operating in **any** state (i.e., Licensee).

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

= Indirect interest

Organizational Chart (Slide 2)



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EXHIBIT C

Family Violence Shelter Confidentiality 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.

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FAMILY VIOLENCE SHELTER CONFIDENTIALITY PROTECTION AFFIDAVIT

OFFICER OR ATTORNEY/ AGENT:					
COMPANY	Vero Networks ABS, LLC				
NAME	Chris Pietila				
TITLE	General Counsel				
ADDRESS 1	1580 N. Logan St.				
ADDRESS 2	Suite 660 – PMB 613180				
CITY	Denver	STATE	CO	ZIP CODE	80203

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.

SIGNATURE OF AFFIANT

10/29/2026
DATE

SUBSCRIBED AND SWORN TO ME THIS
29th DAY OF October, 20 26.

NOTARY PUBLIC

(SEAL)

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

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

EXHIBIT D

Management Biographies

Key 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.

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.

Chris Pietila, General Counsel
Chris Pietila serves as General Counsel for the Vero companies. Chris has 18 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.

TRADE SECRET EXHIBIT E

Financial Statements

[FILED UNDER SEAL]

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

Application of **Vero Networks ABS, 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, Vero Networks ABS, 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, VFN Holdings, Inc. ("VFN Holdings"). Applicant and VFN Holdings 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 VFN Holdings and its subsidiaries, including Applicant, 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 VFN

Holdings' 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

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 November 6, 2026.

/s/ Danielle Burt
Danielle Burt
Case Smith
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., N.W.
Washington, D.C. 20004
202-739-3000 (tel)
202-739-3001 (fax)
danielle.burt@morganlewis.com
case.smith@morganlewis.com

Counsel for Vero Networks ABS, LLC

PUBLIC - TRADE SECRET INFORMATION EXTRACTED

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

Application of **Vero Networks ABS, LLC** for a Certificate of Authority to Provide Competitive Local Exchange Telecommunications Services	Docket No. _____

AFFIDAVIT

STATE OF COLORADO)
)
COUNTY OF BROOMFIELD)

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

1. I am the Chief Legal Officer of Vero Networks ABS, LLC ("Applicant"), the Applicant in the above-captioned matter, and its indirect, parent company, VFN Holdings, Inc. ("VFN Holdings").

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 VFN Holdings ("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.

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.

By: _____
Gregg Strumberger

Sworn and subscribed to before me this
5 day of NOVEMBER, 2026.

_____
Notary Public

JUSTIN GIGLIOTTI
NOTARY PUBLIC - STATE OF COLORADO
NOTARY ID 20224013062
MY COMMISSION EXPIRES APR 29, 2030