

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners:      Andrew J. French, Chairperson  
                                      Dwight D. Keen  
                                      Annie Kuether

In the Matter of ANPI, LLC Application	)	
for a Certificate of Public Convenience and	)	Docket No. 25-ANPC-218-COC
Necessity for Authority to Provide	)	
Interexchange Service in the State of Kansas	)	

**ORDER APPROVING CERTIFICATE OF CONVENIENCE APPLICATION**

The above-captioned matter comes before the State Corporation Commission of the State of Kansas (“Commission”) for consideration and determination. Having examined its files and records, the Commission finds and concludes:

1.        On November 14, 2024, ANPI, LLC (hereafter referenced as ANPI or Company) filed its Application for Certificate of Convenience and Authority (COC) to provide Interexchange Telecommunication Services (IXC) within the state of Kansas.

2.        Commission Staff (Staff) submitted a Report and Recommendation (R&R), dated April 22, 2025, in regard to the Application. Staff’s R&R is attached hereto and made a part hereof by reference.

3.        K.S.A. 66-131 states: “No common carrier or public utility...shall transact business in the state of Kansas until it shall have obtained a certificate from the corporation commission that public convenience will be promoted by the transaction of said business and permitting said applicants to transact the business of a common carrier or public utility in this state.”

4.        Pursuant to K.S.A 66-2005(w), telecommunications carriers seeking a certificate of convenience and necessity must demonstrate the technical, managerial and financial viability and the ability to meet quality of service standards established by the Commission.

5. ANPI is a Delaware company that is properly registered with the Kansas Secretary of State's Office as a Foreign Limited Liability Company with a status of active and in good standing and is registered with the Federal Communications Commission (FCC) to provide telecommunications services.<sup>1</sup>

6. ANPI seeks certification to provide wholesale-resold IXC services within the state of Kansas using facilities and services available from its underlying carriers. ANPI will not offer residential services.<sup>2</sup>

7. Based on Staff's R&R the Commission finds that ANPI has the technical, managerial, and financial viability to provide IXC services in Kansas and, to the extent that the company's presence in Kansas would increase consumer's options for services, that the general public would benefit from Commission approval of this application.<sup>3</sup>

8. Based on Staff's R&R, the Commission finds and directs ANPI to do the following:

- a. Register with Vantage Point Solutions (VPS), the Kansas Universal Service Fund (KUSF) Administrator, within 30 days of an Order granting the Company's Application, and make the appropriate KUSF remittance and payment election via the Company Identification and Operations Form.
- b. Within 30 days of generating Kansas assessable revenue, the Company shall submit the relevant Carrier Remittance Worksheets and assessment payments to VPS.

---

<sup>1</sup> Staff's R&R at p. 2.

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 3.

- c. Notify the Commission immediately of any change in address or contact telephone numbers or email addresses, to timely file annual interrogatories, and to maintain current registration with the Kansas Secretary of State's Office.
  - d. Pay all Commission and KUSF assessments in a timely manner
9. The Commission adopts Staff's R&R as additional findings in this matter.
10. The Commission therefore concludes that ANPI's Application for a certificate to provide the identified services in Kansas is reasonable.

**THEREFORE, THE COMMISSION ORDERS:**

A. ANPI, LLC's request for a Certificate of Convenience and Necessity and Authority to Provide Interexchange Telecommunications Services in the state of Kansas is approved.

B. ANPI, LLC must register with Vantage Point Solutions, the Kansas Universal Service Fund Administrator, within 30 days of an Order granting the Company's Application, and make the appropriate KUSF remittance and payment election via the Company Identification and Operations Form. Within 30 days of generating Kansas assessable revenue, the Company shall submit the relevant Carrier Remittance Worksheets and assessment payments to VPS.<sup>4</sup>

C. ANPI, LLC is directed to notify the Commission immediately of any change in address or contact telephone numbers or email addresses, file timely annual interrogatories, maintain current registration with the Kansas Secretary of State's Office, and pay all Commission and Kansas Universal Service Fund assessments in a timely manner.<sup>5</sup>

D. Any party may file and serve a petition for reconsideration pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).<sup>6</sup>

---

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> K.S.A. 66-118b; K.S.A. 77-503(c); K.S.A. 77-531(b).

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 04/29/2025



---

Celeste Chaney-Tucker  
Executive Director

AAL

**REPORT AND RECOMMENDATION  
UTILITIES DIVISION**

**TO:** Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

**FROM:** Jorge Soto-Gomez, Telecommunications Analyst  
Steve Garrett, Deputy Chief of Telecommunications  
Jeff McClanahan, Director of Utilities

**DATE:** April 22, 2025

**SUBJECT:** Docket No. 25-ANPC-218-COC

In the Matter of ANPI, LLC Application for a Certificate of Public Convenience and Necessity for Authority to Provide Interexchange Service in the State of Kansas.

**EXECUTIVE SUMMARY:**

On November 14, 2024, ANPI, LLC filed an application with the Kansas Corporation Commission (Commission) for a Certificate of Convenience and Authority (COC) seeking authority to provide resold interexchange carrier (IXC) services within the state of Kansas. Commission Staff (Staff) recommends the approval of this application.

On November 26, 2024, the Commission issued a suspension order to allow additional time for Staff review. The Commission action date is **Monday, July 14, 2025**, due to a suspension order.

**BACKGROUND:**

The Commission derives its authority and jurisdiction to supervise and control telecommunications public utilities from K.S.A. 66-1,188 and K.S.A. 66-2005(z). The Commission derives its authority to certificate and de-certificate public utilities from K.S.A. 66-131; which requires the Commission to review all certification and decertification applications to determine whether the public convenience and necessity will be promoted by granting the request.

Pursuant to K.S.A 66-2005(w), telecommunications carriers seeking a certificate of convenience and necessity must demonstrate the technical, managerial and financial viability and the ability to meet quality of service standards established by the Commission.

## **ANALYSIS:**

ANPI, LLC is a Delaware company headquartered at One North Wacker, Suite 2500 Chicago, IL 60606. The company registered with the Kansas Secretary of State's office on May 25, 2011, as a Foreign Limited Liability Company and is currently "active and in good standing".<sup>1</sup> The company is registered with the Federal Communications Commission (FCC) to provide telecommunication service and indicates to operate in Kansas.<sup>2</sup>

ANPI, LLC proposes to provide resold IXC services to business & wholesale carrier customers, using facilities and network equipment from its underlying carriers within the state of Kansas. The company will not offer residential services. ANPI, LLC will mainly provide unregulated services with business telephony such as Hosted Internet Protocol Private Branch Exchange (IPPBX) communications systems that utilizes Voice Over Internet Protocol (VoIP) technology. Their IPPBX systems, made available to business customers, will employ devices such as Fiber Cable, Cable Modem, Analog Telephone Adapter (ATA), Router, Ethernet, Multi-Protocol Label Switching (MPLS), Point to Point, and Private Line. Furthermore, ANPI, LLC will include service offerings such as emergency, operator, directory assistance and other ancillary features.<sup>3</sup>

ANPI, LLC is currently providing services in 39 states and in 11 of those states the company is also approved & registered as an IXC. The company will not have any service personnel located in Kansas. The company provided its customer service contact information for service, billing or repair/maintenance related issues in the application.<sup>4</sup> The company included a signed Telecommunications Carrier Code of Conduct with its application. The company has never had authorization revoked by any state commission. Although not required for IXC applications<sup>5</sup>, the company submitted an illustrative tariff with its application that will be filed upon Commission approval of this application.<sup>6</sup>

ANPI, LLC's application presented key management personnel from its operations in the U.S.<sup>7</sup> Some of which are also on its Global Leadership Team<sup>8</sup> from its ultimate parent company Sinch AB headquartered in Stockholm, Sweden. The company provided an organizational chart in its application as Exhibit A.1.<sup>9</sup> The company identified its Chief Executive Officer Laurinda Pang (U.S. & Sinch AB), President & Chief Technology Officer Brett Scorza (U.S. & Sinch AB), Chief Financial Officer Brian West (U.S.), General Counsel & Secretary Richard Monto (U.S.), Executive Vice President of the Americas Julia Fraser (Sinch AB), other executives and Board of

---

<sup>1</sup> Kansas Secretary of State, ANPI, LLC, <https://www.sos.ks.gov/eforms/BusinessEntity/Search.aspx>, last viewed April 4, 2025.

<sup>2</sup> FCC Form 499 Filer Database, ANPI, LLC, Registration current as of 04/01/2024, <https://apps.fcc.gov/cgb/form499/499a.cfm>, last viewed April 4, 2025.

<sup>3</sup> Application, Section 9, p. 6.

<sup>4</sup> *Id.*, Section 10, p. 7-8.

<sup>5</sup> *Order*, p. 2, ¶ 4, Docket No. 13-GIMT-736-GIT, dated December 3, 2013.

<sup>6</sup> Application, Section 12, p. 9.

<sup>7</sup> *Id.*, Exhibit D, Leadership & Management Biographies, p. 167-169.

<sup>8</sup> *Id.*, Exhibit C, Sinch 2023 Annual Report (p. 37-39), p. 75-77 of the application; *Global Leadership Team*, Investors Relations website of Sinch AB (publ) 2025, <https://investors.sinch.com/corporate-governance/global-leadership-team>, last viewed April 4, 2025.

<sup>9</sup> *Id.*, Exhibit A.1, p. 20.

Directors. Staff believe that adequate expertise and experience exists through ANPI, LLC's management to operate telecommunications services.

ANPI, LLC's Exhibit C, 2023 Sinch Annual Report, contained financial information from both the 2023-2022 consolidated & ultimate parent company Sinch AB financial statements.<sup>10</sup> The statements presented were in the currency of Swedish Krona (SEK) rounded to the nearest million. The statements were accompanied by notes. The consolidated financial statements were prepared in accordance with the International Financial Reporting Standards (IFRS) adopted by the European Union and issued by the International Accounting Standards Board (IASB). The financial year of 2023 was audited.<sup>11</sup> Staff's review of a company's financial viability is determined by reviewing a three-year period of both the Income and Balance Sheet statements. ANPI, LLC's application contained statements from financial years 2023, 2022 and had incomplete data of other years. The partial data provided from the other years were not proper/complete financial statements and did not consistently follow the same format. On February 6, 2025, Staff sent Discovery Request (DR) No. KCC-2 containing two questions.<sup>12</sup> Question 2 of DR No. KCC-2 requests for 2023, 2022, and 2021 comparative financial statements of the Income and Balance Sheet. On March 4, 2025, Staff received a response to Question 2 that was unsatisfactory. On April 1, 2025, ANPI, LLC turned in confidential consolidated financial statements of the United States indirect parent company Onvoy Holdings, Inc. that satisfied Staff's DR Question 2. The company provided unaudited 2024-2022 and included 2021-2020 statements. The currency presented in the U.S. Dollar. The confidential financial records submitted were satisfactory.

Based on the review of ANPI, LLC's application, exhibits, and DRs, Staff believes the company has the technical, managerial, and financial viability to provide IXC services in Kansas. To the extent that the company's presence in Kansas would increase consumer's options for services, Staff believes the general public would benefit from Commission approval of this application.

### **RECOMMENDATION:**

Staff recommends the Commission approve ANPI, LLC's application for its COC to provide resold IXC services within the state of Kansas. The Commission should direct the company to register with Vantage Point Solutions (VPS), the Kansas Universal Service Fund (KUSF) Administrator, within 30 days of an Order granting the company's application, through the appropriate KUSF remittance and payment election via the Company Identification and Operations Form. Within 30 days of generating Kansas intrastate assessable retail revenue, the company shall submit the relevant Carrier Remittance Worksheets and assessment payments to VPS. ANPI, LLC should be reminded to notify the Commission immediately of any change in address or contact information, timely file Annual Interrogatories, maintain current registration with the Kansas Secretary of State's Office, and pay all Commission and KUSF assessments in a timely manner.

---

<sup>10</sup> *Id.*, Exhibit C, Sinch 2023 Annual Report, Financial Statements (p. 52-61), p. 90-99 of the application; Notes that accompany Financial Statements (p.62-99), p. 100-137 of the application.

<sup>11</sup> *Id.*, Exhibit C, Sinch 2023 Annual Report, Notes (p. 62) p. 100 of the application and Auditor's Report (p. 119), p. 157 of the application.

<sup>12</sup> On December 2, 2024, Staff sent Discovery Request (DR) No. KCC-1 containing 12 questions. Staff received DR No. KCC-1 on December 12, 2024.

**CERTIFICATE OF SERVICE**

25-ANPC-218-COC

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 04/29/2025.

LAURA GARFINKEL, ATTORNEY  
CLIFTONLARSONALLEN LLP  
3575 PIEDMONT ROAD NE  
BLDG 15, SUITE 1550  
ATLANTA, GA 30305  
laura.garfinkel@claconnect.com

PATRICK HURLEY, CHIEF LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
patrick.hurley@ks.gov

AHSAN LATIF, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD RD  
TOPEKA, KS 66604  
ahsan.latif@ks.gov

/S/ KCC Docket Room  
\_\_\_\_\_  
KCC Docket Room