



Sarah Swain
sswain@cooley.com

June 17, 2025

Via E-Filing

Ms. Lynn Retz, Executive Director
Utilities Division
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604-4027

**Re: Docket No. 25-VFNT-365-COC
Application of Vero Fiber Networks, LLC for Certificate of Convenience and Authority to
Provide Resold and Facilities-Based Interexchange Telecommunications Services in the
State of Kansas**

AMENDED APPLICATION

Dear Director Retz:

Attached for electronic filing with the Commission is the above-referenced Amended Application on behalf of Vero Fiber Networks, LLC ("Applicant"). Pursuant to discussions with Commission Staff, the Amended Application removes its request for authority to provide competitive local exchange service that was included in the original Application filed on March 28, 2025. Applicant, per its Amended Application, now solely seeks authority to provide resold and facilities-based interexchange telecommunications services in the State of Kansas.

Pursuant to K.S.A. § 66-1220a, Applicant respectfully requests that the Commission treat as confidential Confidential Exhibit E-1, which is redacted from the public filing. Confidential Exhibit E-1 contains financial statements of Applicant's parent company, VFN Holdings, Inc. ("VFN Holdings"). VFN Holdings is a privately-owned corporation that does not release its financial statements to the public and otherwise treats its financial statements as confidential. Applicant is submitting a non-redacted, confidential version of the Application simultaneously with the public version.

Please acknowledge receipt of the electronic copy. Should you have any questions concerning this filing, please do not hesitate to contact me or my colleague, Brett Ferenchak (bferenchak@cooley.com; 202-776-2138).

Respectfully submitted,

/s/ Sarah Swain
Sarah Swain (KS Bar No. 29410)

Counsel for Vero Fiber Networks, LLC

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

Amended Application of

Vero Fiber Networks, LLC

for Certificate of Convenience and Authority to
Provide Resold and Facilities-Based
Interexchange Telecommunications Services in
the State of Kansas

Docket No. 25-VFNT-365-COC

**AMENDED APPLICATION OF VERO FIBER NETWORKS, LLC
FOR CERTIFICATE OF AUTHORITY TO SERVE AS A
TELECOMMUNICATIONS SERVICES PROVIDER IN KANSAS**

Comes now, Vero Fiber Networks, LLC (“Vero Fiber” or “Applicant”), by its undersigned counsel and pursuant to K. S. A. 66-131, 66-2003 and 66-2005(w) of the Kansas Corporation Commission (“Commission”), files this amended application for a Certificate of Convenience and Authority (“Certificate”) to provide facilities-based and resold interexchange telecommunications services throughout the State of Kansas and making claim that public convenience will be thereby promoted.¹

Applicant, for purposes of verification and in evidence of fitness to operate, offers the following information in support of this amended application:

1. Full, correct name (including d/b/a) of company, firm, association or corporation making this filing.

Vero Fiber Networks, LLC

¹ On March 28, 2025, Applicant filed an Application seeking a Certificate to provide both facilities-based and resold local exchange and interexchange telecommunications services. This Amended Application removes, without prejudice to seeking such authority in the future, the request for a Certificate to provide facilities-based and resold local exchange telecommunications services. This Amended Application also includes certain updates regarding Applicant’s operations.

2. Federal Identification Number.

82-2606100

3. Type of Certification requested by applicant.

- ☐ Competitive Local Exchange Service
- ☒ Interexchange (long distance or toll) Service
- ☐ Operator Services and Interexchange (toll) Service
- ☐ Resale
- ☐ Facilities-based
- ☒ Combined Resale and Facilities-based

4. Address (if the mailing address is a P.O. Box number, also provide the actual street address) and telephone number(s) for the principal office of the company and its local office (if any), including 800 customer service number:

The Applicant's corporate headquarters is located at:

Vero Fiber Networks, LLC
1023 Walnut Street
Boulder, CO 80302
Tel: (800) 691-8376

Written correspondence regarding the Applicant should be sent to:

Gregg Strumberger
Chief Legal Officer
P.O. Box 1110
Boulder, CO 80306
Tel: (303) 350-4060
gstrumberger@veronetworks.com

5. If individually owned, name of individual doing business under above name.

Not applicable.

6. Requested serving territory (statewide for toll service; local service may be limited to specific exchange areas due to rural exemption guidelines; and operator services may be limited to specific institutions).

Applicant requests a Certificate to provide facilities-based and resold interexchange telecommunications services throughout the State of Kansas.

7. Name, title, address telephone number and email address of person preparing this application.

Correspondence concerning this Application should be directed to Applicant's attorneys:

Sarah Swain (KS Bar No. 29410)
Cooley LLP
1299 Pennsylvania Ave., N.W.
Suite 700
Washington, DC 20004
Tel: 202-728-7032
sswain@cooley.com

with a copy to:

Tamar Finn
Brett P. Ferenchak
Cooley LLP
1299 Pennsylvania Ave., N.W.
Suite 700
Washington, DC 20004
Tel: 202-842-7800
tfinn@cooley.com
bferenchak@cooley.com

and:

Gregg Strumberger
Chief Legal Officer
P.O. Box 1110
Boulder, CO 80306
Tel: (303) 350-4060
gstrumberger@veronetworks.com

8. Name, title, address, telephone number and email address of Commission/Industry Relations contact.

Following the grant of this Application, the Commission should direct all correspondence to Vero Fiber's regulatory contact:

Gregg Strumberger
Chief Legal Officer
P.O. Box 1110
Boulder, CO 80306
Tel: (303) 350-4060
gstrumberger@veronetworks.com

Vero Fiber's registered agent in Kansas is:

Corporation Service Company
1100 Southwest Wanamaker Drive, Suite 203
Topeka, KS 66604

9. Organizational Information.

In the table below, give name and address of each officer (when an individual holds more than one office, list name for each office held):

Corporate Officers and Directors

<u>Name</u>	<u>Title</u>
Matt Erickson	Chairman
Pam Moore	Chief Executive Officer
Greg Friedman	Chief Financial Officer
Gregg Strumberger	Chief Legal Officer

All officers and directors can be reached through Applicant's place of business.

10. Description of Applicant's operations (provide as Exhibits):

Please see **Exhibit A**.

11. Applicant's Managerial Qualifications (provide as Exhibits):

Please see **Exhibit B**.

12. Is your company currently providing telecommunications service in any other state? If so, in an Exhibit, please name the state(s), provide a description of your company's operations therein and list the approximate number of customers in each state.

Please see **Exhibit C** for a list of states where Applicant is currently authorized to provide intrastate telecommunications services.

Applicant has not been denied requested certification in any jurisdiction, nor has any permit, license, or certificate been permanently revoked by any authority.

13. Financial Information:

a. Stock

Line No.	Class of Stock Common Or Preferred etc.	No. of Shares Authorized by charter	No. of Shares Act-wally Sold	No. of Shares Can-celled	No. of Shares Held for Resale	No. of Shares Out-standin g	Par Value per Share	Total Amnt. Out-stand-ing per Fin. Stmt.	Divi-dends Declar ed During Year
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(J)
1									
2									
3									
4									
etc.									

Not applicable. As a limited liability company, Applicant does not have capital stock, but membership interests. Please see **Exhibit D** for the ownership structure of Applicant.

- b. List information concerning the stockholders holding the highest number of shares of stock. If no one stockholder holds more than 5% of the total shares outstanding, so indicate by placing an "X" in this blank X and omit the information called for in the schedule below.**

Not applicable, see Response to Question 13.a.

- c. Sole proprietorships and/or partnerships or any other business organization including, but not limited to limited liability companies, limited partnerships, and LLPs must add an Exhibit to show the organizational structure and share interests in assets, liabilities and profits.**

Please see **Exhibit D** for the ownership structure of Applicant.

14. Applicant's Financial Qualifications (provide as Exhibits):

Applicant does not maintain financial statements separate from the consolidated financial statements of its immediate parent company, VFN Holdings, Inc. ("VFN Holdings"). For purposes of this Application, Applicant will rely on the financial statements of VFN Holdings to demonstrate Applicant's financial qualification to operate in the State of Kansas. The audited 2022 and 2023, and unaudited 2024 financial statements of VFN Holdings are provided as **Confidential Exhibit E**.

15. As an attachment, please provide state of incorporation and proof of incorporation in that state.

Applicant is a Colorado limited liability company formed on October 13, 2017. A copy of its formation document is attached as **Exhibit F**.

16. As an attachment, please provide proof of registration with the Kansas Secretary of State (must maintain registry and remain in good standing).

A copy of Applicant's Certificate of Authority to Transact Business as a foreign corporation in Kansas, is attached as **Exhibit G**.

17. Name and telephone number of the contact person for customer service.

Vero Fiber's customer service number is 800-691-8376.

Vero Fiber's primary point of contact for customer service is:

David Hill
P.O. Box 1110
Boulder, CO 80306
Tel: (303) 350-4060
dhill@veronetworks.com

18. Competitive Local Exchange (CLEC) applicants need to provide an interconnection or resale agreement with the incumbent local exchange carrier(s) for the service territory designated above, if consummated. Please indicate the docket number(s) and

Commission approval date(s) for each. (Local operations may not begin until such agreements have been approved by the KCC.)

N/A. Applicant only seeks a Certificate to provide facilities-based and resold interexchange telecommunications services in the State of Kansas.

19. CLEC Applicants must provide a copy of the Company's proposed Intrastate Access tariff. (Operations may not begin until a tariff has been filed with and approved by the KCC.)

N/A.

20. Complete, sign and attach the KCC Telecommunications Carrier Code of Conduct form as part of this application.

Attached as **Exhibit H** is the Carrier Code of Conduct which has been executed by an officer of the Applicant.

The grant of this Application will promote the public interest by increasing competition in the provision of telecommunications services. In addition to driving prices closer to costs, thereby ensuring just and reasonable rates, competition also promotes efficiency in the delivery of services and in the development of new services. These benefits work to maximize the public interest by providing continuing incentives for carriers to reduce costs while, simultaneously, promoting the availability of potentially desirable services. Vero Fiber's operations in Kansas will be overseen by a well-qualified management team with substantial telecommunications experience and technical expertise to provide customers high-quality, cost effective service.

For the reasons stated above, Applicant respectfully submits that the public interest, and convenience would be furthered by a grant of this Application for the authority to provide all types of facilities-based and resold interexchange telecommunications services. Accordingly, Applicant requests that the Commission expeditiously grant this Application.

Respectfully submitted,

/s/ Sarah Swain

Sarah Swain (KS Bar No. 29410)
Cooley LLP
1299 Pennsylvania Ave., N.W.
Suite 700
Washington, DC 20004
Tel: 202-728-7032
sswain@cooley.com

Counsel for Vero Fiber Networks, LLC

DATED: June 17, 2025

LIST OF EXHIBITS

Exhibit A	Description of Applicant's Operations (Question 10)
Exhibit B	Applicant's Managerial Qualifications (Question 11)
Exhibit C	List of States Where Applicant Operates
Exhibit D	Ownership Structure
Confidential Exhibit E	Applicant's Financial Qualifications (Question 14) [CONFIDENTIAL]
Exhibit F	Formation Documents
Exhibit G	Certificate of Authority to Transact Business
Exhibit H	Telecommunications Carrier Code of Conduct
Verification	

EXHIBIT A

Description of Applicant's Operations (Question 10)

- a. Applicant's short run and long run growth plans for providing intrastate telecommunication service in Kansas (i.e. What services will be provided and how quickly? Will service be offered statewide to residential, business or residential and business? Are specific local exchanges, localities or the service area(s) of specific companies included in these plans? If local service, how many exchanges will be served and which of those will be served first? What are the general characteristics of those exchanges?).**

Applicant seeks authority to provide facilities-based and resold interexchange telecommunications services throughout the state of Kansas. Applicant's services will primarily be point-to-point transmission services, including primarily Ethernet and Wavelength service but also private line (e.g., DSn or OCn services). The point-to-point services transmit two-way data messages between two or multiple end points. Applicant's primary business is to provide essential telecommunications and broadband infrastructure to underserved schools and libraries, both directly and through wholesale arrangements, by connecting those schools and libraries with reliable, scalable, and secure connectivity. Applicant intends to deliver an aggregation of technologies utilizing fiber optic cable depending on the customer's location and needs. Applicant also intends to provide telecommunication and broadband infrastructure services to other educational, healthcare, government, banking, telecommunications and business customers throughout the state. Applicant will primarily provide services using its own facilities and facilities leased from other carriers, but also seeks authority to provide services on a resold basis.

Applicant proposes to provide customized service solutions to educational, healthcare, government, banking, telecommunications and business customers in Kansas. Applicant's typical customers are sophisticated users of telecommunication services and the services they purchase from Applicant are often highly customized to the individual customer.

Applicant does not have any current plans to provide switched voice services to customers in Kansas. Applicant will perform network and equipment maintenance necessary to ensure compliance with any quality-of-service requirements. Applicant will comply with all applicable Commission rules, regulations and standards, and will provide safe, reliable and high-quality telecommunications services in Kansas.

b. Estimated number of company service personnel assigned to telephone service who will be located in Kansas during the time periods mentioned above?

At this time, Applicant has one employee in the State of Kansas who works as an account manager providing support to Applicant's education customers in Kansas and elsewhere across the Country. Responsibility for Kansas network operations will be handled by Applicant's current management team from its Boulder, CO location.

c. What telecommunications equipment will be deployed in the state and where will it be deployed over the period of time mentioned above?

As discussed above, Applicant will primarily provide services using its own fiber optic cable and related network equipment, as well as leasing similar facilities from other carriers, to provide customized service solutions to educational, healthcare, government, banking, telecommunications and business customers in Kansas. These facilities will be deployed and/or leased in accordance with the customized needs of Applicant's individual customers. The equipment Applicant will use to provide regulated services includes Ethernet and layer 3 switches and routers. Vero Fiber primarily utilizes Ciena switches and routers to meet its network needs.

d. Has any state or federal entity denied certification to your company or taken any enforcement action against your company's service operations (such as a fine or a Cease and Desist action)? If so, please explain.

Applicant has not been denied requested certification in any jurisdiction, nor has any permit, license, or certificate been permanently revoked by any authority.

- e. **Provide a list of enforcement proceedings or criminal charges involving applicant or its principals in connection with the provision of telecommunications services within the last five (5) years anywhere in the United States including, but not limited to:**

**injunctions
cease and desist orders
civil lawsuits
consent decrees
assurances of voluntary compliance
civil investigative demands (CID's)
subpoenas**

Identify the office or administrative agency that instituted each action, the date it was instituted, and the outcome thereof. Provide a copy of the final order or judgment. (This does not include actions for the collection of debts or domestic matters.) If no actions apply please indicate none.

Neither Applicant nor any of its officers or directors are currently nor have within the past five (5) years been involved in any enforcement proceedings nor have been the subject of criminal charges by any administrative agency within the United States.

Out of an abundance of caution, Applicant advises the Commission that its affiliates, Vero Broadband, LLC has been subject to an enforcement proceeding. Specifically, the FCC issued a Notice of Apparent Liability for Forfeiture finding that Vero Broadband, LLC acquired the assets, including Section 214 authorizations and wireless licenses, of certain entities that were in bankruptcy without prior approval. *In re Vero Broadband, LLC*, Notice of Apparent Liability for Forfeiture, File No. EB-IHD-22-00033591 (rel. Mar. 22, 2024). See <https://docs.fcc.gov/public/attachments/DA-24-282A1.pdf>. The FCC imposed a forfeiture of \$48,000 for the violation, which Vero Broadband, LLC timely paid.

EXHIBIT B

Applicant's Managerial Qualifications (Question 11)

- a. Description of applicant's actual experience in the telecommunications business, specifically that represented in this application.**

Applicant is technically and managerially qualified to provide telecommunications services in Kansas. The Vero Fiber team has an extensive background in managing and operating telecommunications companies and nearly 150 years of combined experience.

- b. Managerial qualification of your company's key personnel (copies of resumes are appropriate).**

Below are the biographies for Applicant's key managerial personnel, reflecting that the Applicant possesses significant managerial expertise for operating a telecommunications company:

Managerial Biographies

Matt Erickson

Matt Erickson, is a founding member of Vero Fiber and serves as its Chairman and managing partner. 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

Greg has 20 years' experience in telecom, tech and real estate and currently serves as Vero's CFO. He was previously EVP at Zayo, where he managed Zayo's datacenter businesses. Prior to Zayo, Greg held various executive and management roles at Level 3 Communications, Deloitte, and Cap Gemini. He received a BS from the Univ. of Pennsylvania and an MBA from the Wharton School.

Dave Jones

Dave Jones is a member of Vero Fiber and serves as its CTO. Dave has 25+ years of technical leadership experience in the fiber and wireless industries. Prior to joining Vero, Dave was EVP of Dark Fiber Solutions at Zayo, where he had overall responsibility for the Dark Fiber and Mobile Infrastructure product groups. Dave has also previously held senior positions with FiberTower, Formus Communications, Sprint PCS, US WEST, and the NTIA. Dave earned a BSEE and an MS Telecom from the University of Colorado.

Zach Nebergall

Zach Nebergall is a founding member of Vero Fiber and serves as its EVP, Product and Strategy. Zach has 19 years of experience in the Communications and Internet industries. Before Vero, Zach worked for 7 years at Zayo holding various leadership roles. His role at the time he left Zayo was Senior VP of Zayo's largest business segment, the Metro Dark Fiber Group. In this role, he was responsible for managing the full operations and financial activities of the Metro Dark Fiber business, including pricing, capital management, engineering, service delivery, and network planning.

Pam Moore

Pam Moore is a member and serves as the 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.

John Real

John Real is a founding member of Vero Fiber and serves as EVP of Sales. Prior to Vero Fiber, John spent over 7 years at Zayo holding various executive roles, charged with leading sales and support for school districts networks. Prior to Zayo, John spent 3 years as CEO of VoicePipe, an internet and telephony provider that was acquired by Zayo in 2007. John started his telecom career at ICG Communications.

Gregg Strumberger

Gregg Strumberger is a founding member of Vero Fiber and serves as its 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, DC.

EXHIBIT C

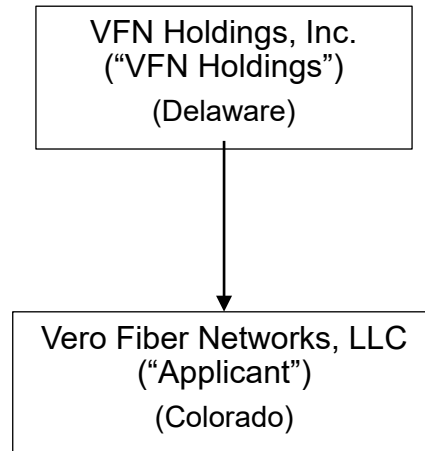
List of States Where Applicant Operates

Applicant is currently authorized to provide intrastate telecommunications services in the following states: Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Nevada, New Mexico, North Carolina, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, Washington, West Virginia and Wisconsin. Applicant is also in the process of seeking authority to provide intrastate telecommunications services in Hawaii.

Applicant has on average between 1 – 10 customers in each of the states where Applicant is currently authorized to provide intrastate telecommunications services.

EXHIBIT D

Ownership Structure



All ownership percentages are 100%

The entities listed herein only include the Applicant and the entities that are in its chain of ownership. The chart excludes all other subsidiaries of VFN Holdings, Inc.

CONFIDENTIAL EXHIBIT E

Applicant's Financial Qualifications (Question 14)

Applicant possesses the requisite financial resources to provide telecommunications services in Kansas. Applicant does not maintain financial statements separate from the consolidated financial statements of its immediate parent company, VFN Holdings, Inc. (“VFN Holdings”). For purposes of this Application, Applicant will rely on the financial statements of VFN Holdings to demonstrate Applicant’s financial qualification to operate in the State of Kansas. As shown in the financial statements, Applicant is financially qualified to operate within the State of Kansas.

a. Comparative Income Statements for the immediately preceding three (3) year period (audited positive statements preferred).

Comparative Income Statements for VFN Holdings for 2022, 2023, and 2024, are provided as **Confidential Exhibit E-1**.

b. Balance Sheets for the immediately preceding three (3) year period (audited positive statements preferred).

Balance Sheets for VFN Holdings for 2022, 2023, and 2024 are provided as **Confidential Exhibit E-1**.

c. A forward-looking management narrative discussing any significant activity that may impact either the Income Statement or Balance Sheet provided.

Please see **Confidential Exhibit E-1** for a narrative of any significant activities that may have an impact on the financial statements.

CONFIDENTIAL EXHIBIT E-1

Financial Statements of VFN Holdings

REDACTED

EXHIBIT F

Formation Documents



Document must be filed electronically.
Paper documents are not accepted.
Fees & forms are subject to change.
For more information or to print copies
of filed documents, visit www.sos.state.co.us.

Colorado Secretary of State
Date and Time: 10/13/2017 03:43 PM
ID Number: 20171770786
Document number: 20171770786
Amount Paid: \$50.00

ABOVE SPACE FOR OFFICE USE ONLY

Articles of Organization

filed pursuant to § 7-80-203 and § 7-80-204 of the Colorado Revised Statutes (C.R.S.)

1. The domestic entity name of the limited liability company is

Vero Fiber Networks, LLC

(The name of a limited liability company must contain the term or abbreviation "limited liability company", "ltd. liability company", "limited liability co.", "ltd. liability co.", "limited", "l.l.c.", "llc", or "ltd.". See §7-90-601, C.R.S.)

(Caution: The use of certain terms or abbreviations are restricted by law. Read instructions for more information.)

2. The principal office address of the limited liability company's initial principal office is

Street address

1023 Walnut Street

(Street number and name)

Boulder

(City)

CO

(State)

80302

(ZIP/Postal Code)

United States

(Country)

Mailing address

(leave blank if same as street address)

PO Box 1110

(Street number and name or Post Office Box information)

Boulder

(City)

CO

(State)

80306

(ZIP/Postal Code)

United States

(Country)

3. The registered agent name and registered agent address of the limited liability company's initial registered agent are

Name

(if an individual)

Friedman

(Last)

Gregory

(First)

(Middle)

(Suffix)

or

(if an entity)

(Caution: Do not provide both an individual and an entity name.)

Street address

431 7th Street

(Street number and name)

Unit 773811

Steamboat Springs

(City)

CO

(State)

80487

(ZIP Code)

Mailing address

(leave blank if same as street address)

PO Box 773811

(Street number and name or Post Office Box information)

Steamboat Springs

(City)

CO

(State)

80477

(ZIP Code)

(The following statement is adopted by marking the box.)

- ☒ The person appointed as registered agent has consented to being so appointed.

4. The true name and mailing address of the person forming the limited liability company are

Name

(if an individual)

Friedman

(Last)

Gregory

(First)

(Middle)

(Suffix)

or

(if an entity)

(Caution: Do not provide both an individual and an entity name.)

Mailing address

PO Box 773811

(Street number and name or Post Office Box information)

Steamboat Springs

(City)

CO

(State)

80477

(ZIP/Postal Code)

United States

(Province – if applicable)

(Country)

(If the following statement applies, adopt the statement by marking the box and include an attachment.)

- ☒ The limited liability company has one or more additional persons forming the limited liability company and the name and mailing address of each such person are stated in an attachment.

5. The management of the limited liability company is vested in

(Mark the applicable box.)

☐ one or more managers.

or

☒ the members.

6. (The following statement is adopted by marking the box.)

- ☒ There is at least one member of the limited liability company.

7. (If the following statement applies, adopt the statement by marking the box and include an attachment.)

- ☒ This document contains additional information as provided by law.

8. (Caution: Leave blank if the document does not have a delayed effective date. Stating a delayed effective date has significant legal consequences. Read instructions before entering a date.)

(If the following statement applies, adopt the statement by entering a date and, if applicable, time using the required format.)

The delayed effective date and, if applicable, time of this document is/are _____.
(mm/dd/yyyy hour:minute am/pm)

Notice:

Causing this document to be delivered to the Secretary of State for filing shall constitute the affirmation or acknowledgment of each individual causing such delivery, under penalties of perjury, that the document is the individual's act and deed, or that the individual in good faith believes the document is the act and deed of the person on whose behalf the individual is causing the document to be delivered for filing, taken in conformity with the requirements of part 3 of article 90 of title 7, C.R.S., the constituent documents, and the organic statutes, and that the individual in good faith believes the facts stated in the document are true and the document complies with the requirements of that Part, the constituent documents, and the organic statutes.

This perjury notice applies to each individual who causes this document to be delivered to the Secretary of State, whether or not such individual is named in the document as one who has caused it to be delivered.

9. The true name and mailing address of the individual causing the document to be delivered for filing are

Friedman	Gregory		
<small>(Last)</small>	<small>(First)</small>	<small>(Middle)</small>	<small>(Suffix)</small>
PO Box 773811			
<small>(Street number and name or Post Office Box information)</small>			
<hr/>			
Steamboat Springs	CO	80477	
<small>(City)</small>	<small>(State)</small>	<small>(ZIP/Postal Code)</small>	
United States			
<small>(Province – if applicable)</small>	<small>(Country)</small>		

(If the following statement applies, adopt the statement by marking the box and include an attachment.)

- ☒ This document contains the true name and mailing address of one or more additional individuals causing the document to be delivered for filing.

Disclaimer:

This form/cover sheet, and any related instructions, are not intended to provide legal, business or tax advice, and are furnished without representation or warranty. While this form/cover sheet is believed to satisfy minimum legal requirements as of its revision date, compliance with applicable law, as the same may be amended from time to time, remains the responsibility of the user of this form/cover sheet. Questions should be addressed to the user's legal, business or tax advisor(s).

OFFICE OF THE SECRETARY OF STATE
OF THE STATE OF COLORADO

CERTIFICATE OF FACT OF GOOD STANDING

I, Jena Griswold, as the Secretary of State of the State of Colorado, hereby certify that, according to the records of this office,

Vero Fiber Networks, LLC

is a

Limited Liability Company

formed or registered on 10/13/2017 under the law of Colorado, has complied with all applicable requirements of this office, and is in good standing with this office. This entity has been assigned entity identification number 20171770786 .

This certificate reflects facts established or disclosed by documents delivered to this office on paper through 03/18/2025 that have been posted, and by documents delivered to this office electronically through 03/19/2025 @ 08:25:32 .

I have affixed hereto the Great Seal of the State of Colorado and duly generated, executed, and issued this official certificate at Denver, Colorado on 03/19/2025 @ 08:25:32 in accordance with applicable law. This certificate is assigned Confirmation Number 17110681 .



Jena Griswold

Secretary of State of the State of Colorado

*****End of Certificate*****

Notice: A certificate issued electronically from the Colorado Secretary of State's website is fully and immediately valid and effective. However, as an option, the issuance and validity of a certificate obtained electronically may be established by visiting the Validate a Certificate page of the Secretary of State's website, <https://www.coloradosos.gov/biz/CertificateSearchCriteria.do> entering the certificate's confirmation number displayed on the certificate, and following the instructions displayed. Confirming the issuance of a certificate is merely optional and is not necessary to the valid and effective issuance of a certificate. For more information, visit our website, <https://www.coloradosos.gov> click "Businesses, trademarks, trade names" and select "Frequently Asked Questions."

EXHIBIT G

Certificate of Authority to Transact Business

STATE OF KANSAS
OFFICE OF SECRETARY OF STATE
CERTIFICATE OF GOOD STANDING

I, SCOTT SCHWAB, Kansas Secretary of State, certify that the records of this office reveal the following:

Business ID: 10026589

Business Name: Vero Fiber Networks, LLC

Type: Foreign Limited Liability Company

Jurisdiction: Colorado

was filed in this office on March 11, 2025, and is in good standing, having fully complied with all requirements of this office.

No information is available from this office regarding the financial condition, business activity or practices of this entity.



In testimony whereof:
I affix my official certification seal.
Done at the City of Topeka,
on this day March 12, 2025.

SCOTT SCHWAB
KANSAS SECRETARY OF STATE

EXHIBIT H

Telecommunications Carrier Code of Conduct

Telecommunications Carrier Code of Conduct Kansas Corporation Commission

As a provider of telecommunications services in the state of Kansas, Applicant, by and through its undersigned officer, commits to comply with the following:

- If applying for certification to provide local telecommunications service, provide:
Access to 911 and E911 services;
White page directory listings;
Access to telephone relay services;
Access to directory assistance;
Access to operator services;

Equal access to interLATA long distance carriers;
Free blocking of 900- and 700-type services
Interconnection on a nondiscriminatory basis with other local exchange carriers
- If requesting Eligible Telecommunications Carrier (ETC) designation, provide all applicable federal Lifeline discounts.
- Follow all applicable Commission rules and regulations.
- Maintain required registration with the Office of the Kansas Secretary of State. To contact the Kansas Secretary of State: Memorial Hall, First Floor, 120 SW 10 Ave., Topeka, KS 66612-1594 (785) 296-4564 or www.kssos.org.
- File Annual Interrogatory Form in accordance with the Commission's Order in Docket 13-GIMT-736-GIT dated December 3, 2013.
- Pay all assessments due to the Commission and/or the Citizen's Utilities Ratepayer Board (CURB) pursuant to K.S.A. 66-1501, 66-1502, 66-1503, and 66-1504.
- File reports and pay assessments to the Kansas Universal Service Fund (KUSF) as set forth in K.S.A. 66-2008(a) and the Commission's December 27, 1996 Order in Docket No. 94-GIMT-478-GIT. KUSF instructions and remittance forms may be obtained online at www.gvnw.com/usf/kansas/index.htm.
- A competitive local exchange carrier wishing to discontinue service shall notify customers and the Commission in accordance with Order No. 7 in the Commission's Docket No. 01-GIMT-649-GIT. An inter-exchange carrier providing service in Kansas wishing to discontinue service shall notify customers in accordance with FCC regulations.
- Promptly notify the Commission of any change of address and contact information.

- Treat each customer equally to all other similarly situated customers, free of prejudice or disadvantage.
- Respect customers' right to select different telecommunications services and vendors.
- Administer procedures to prevent deceptive and unfair marketing practices aimed at potential or existing customers.
- Protect customers' right to privacy, by safeguarding records and personal information against unauthorized use.
- Respond to consumer complaints or inquiries submitted by Commission Staff thoroughly and quickly.

Verification

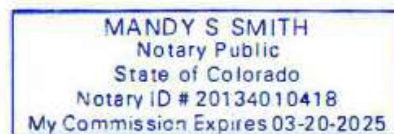
I, Gregg Strumberger, of lawful age, and being first duly sworn, now state: As an officer of the Applicant, I am authorized to and do hereby make the above commitment. Further, I acknowledge that failure to comply with the above commitments or other lawful requirements of the Commission will subject Applicant to potential fines, penalties, revocation of certification, or other sanctions and remedies.



Subscribed and sworn to before me on this 19th Day of March, 2025



Notary Public



VERIFICATION

I, Gregg Strumberger, state that I am Chief Legal Officer of Vero Fiber Network ,LLC (the “Company”); that I am authorized to execute this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company are true to the best of my knowledge, information, and belief.

I declare under pains and penalties of perjury that the foregoing is true and correct.

Executed this 17th day of June, 2025.

Signed: _____



Gregg Strumberger
Chief Legal Officer
Vero Fiber Networks LLC