

Morgan Lewis

John A. Kober

john.kober@morganlewis.com

July 8, 2025

Via E-Filing

Celeste Chaney-Tucker, Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: Application of Zayo Network Services, LLC for a Certificate of Authority to Provide Resold and Facilities-Based Interexchange Telecommunications Services in the State of Kansas

Dear Executive Director Chaney-Tucker:

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

Pursuant to K.S.A. § 66-1220a and K.A.R. § 82-1-221a, Applicant requests that the Commission treat as confidential **CONFIDENTIAL Exhibits C, E-1, and E-2** (collectively, the "Confidential Information") which are redacted from the public filing. Applicant is submitting a non-redacted, confidential version simultaneously with the public version.

The Confidential Information contains critical financial and business information of Applicant, a privately held company. The disclosure of such information could place the Applicant at a significant competitive disadvantage if it is made available to its competitors. The customer counts in **CONFIDENTIAL Exhibit C** and financial information in **CONFIDENTIAL Exhibits E-1 and E-2** are confidential commercial information and constitute trade secrets under K.S.A. § 60-3320(4), as they are compilations that "(i) derive[] independent 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 (ii) [are] the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

As Applicant is a privately held company, the Confidential Information is not available to the general public. Unrestricted availability of the Confidential Information would provide competitors with information regarding Applicant, which competitors could use to evaluate Applicant's business strategies to Applicant's detriment. Such availability would disclose

Morgan, Lewis & Bockius LLP

1717 Main Street, Suite 3200
Dallas, TX 75201-7347
United States

T +1.214.466.4000
F +1.214.466.4001

Celeste Chaney-Tucker, Executive Director
July 8, 2025
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certain non-public details of the Applicant's financial condition and business and could ultimately result in a competitive disadvantage to Applicant. In contrast, confidential treatment will not adversely affect any interested party.

Further, to the extent the Confidential Information has been or may be disclosed to others, Applicant has done so or will do so by way of a confidentiality agreement or similar arrangements, whereby it has been or will be agreed by the parties thereto that the 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. Applicant therefore requests that the Confidential Information being provided to the Commission be afforded confidential status.

A \$250.00 check for the filing fee for the above-referenced Application is being sent via overnight courier.

Should you have any questions regarding this filing, please contact my colleague Patricia Cave (patricia.cave@morganlewis.com; 202-739-5767).

Respectfully submitted,

/s/ John A. Kober

John A. Kober (KS Bar No. 11579)

Counsel for Zayo Network Services, LLC

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

_____)	
In the Matter of the Application of)	
)	
Zayo Network Services, LLC)	
)	Docket No. _____
for Certificate of Convenience and Authority)	
to Provide Resold and Facilities-Based)	
Interexchange Telecommunications Services)	
Within the State of Kansas)	
_____)	

**APPLICATION OF ZAYO NETWORK SERVICES, LLC
FOR CERTIFICATE OF AUTHORITY TO SERVE AS A
TELECOMMUNICATIONS SERVICES PROVIDER IN KANSAS**

Comes now, Zayo Network Services, LLC (“Zayo Network Services” or “Applicant”), by its undersigned counsel and pursuant to K. S. A. § 66-2005(w) of the Kansas Corporation Commission (“Commission”), representing its intention to engage in the business of a Competitive Interexchange Provider in the State of Kansas under the business name of Zayo Network Services, LLC, applies for a Certificate of Convenience and Authority (“Certificate”) to provide interexchange telecommunications services throughout the State of Kansas and making claim that public convenience will be thereby promoted.

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

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

Zayo Network Services, LLC

- 2. Federal Identification Number.**

99-2891539

- 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.**

Applicant's corporate headquarters is located at:

1401 Wynkoop Street, Suite 500
Denver, Colorado 80202
Tel: 303-381-3239

Written correspondence regarding Applicant should be sent to:

Lauren Lantero
1401 Wynkoop Street, Suite 500
Denver, CO 80202
Tel: 303-381-3239
lauren.lantero@zayo.com

Applicant's toll-free Customer Service Number is 866-364-6033.

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 Applicants' attorney:

John Kober (KS Bar No. 11579)
MORGAN, LEWIS & BOCKIUS LLP
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
Tel: 214-466-4105
Fax: 214-466-4001
john.kober@morganlewis.com

with a copy to:

Catherine Wang
Patricia Cave
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202-739-3000
Fax: 202-739-3001
catherine.wang@morganlewis.com
patricia.cave@morganlewis.com

and:

Lauren Lantero
1401 Wynkoop Street, Suite 500
Denver, CO 80202
Tel: 303-381-3239
lauren.lantero@zayo.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 Applicant's regulatory contact and primary point of contact for customer service. Applicant's regulatory contact is:

Lauren Lantero
1401 Wynkoop Street, Suite 500
Denver, CO 80202
Tel: 303-381-3239
lauren.lantero@zayo.com

Applicant's customer service contact is:

Donna Heaston
 Senior Corporate Counsel
 1401 Wynkoop Street, Suite 500
 Denver, CO 80202
 Tel: 763-745-8466
donna.heaston@zayo.com

Applicant's registered agent in Kansas is:

Corporation Service Company
 1100 Southwest Wanamaker Road, Suite 103
 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):

Officers of Applicant

<u>Name</u>	<u>Title</u>
Steve Smith	Chief Executive Officer
Jeff Noto	Chief Financial Officer & Treasurer
Lauren Lantero	Chief Legal Officer & Secretary
Robert Merkel	Assistant Treasurer
Gabriela Torresani	Assistant Secretary

All officers can be reached through Applicant's place of business. Applicant does not have any directors.

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.

Applicant (f/k/a Zayo Northeast, LLC) is currently authorized or registered to provide competitive local exchange, competitive access, and/or interexchange services in Colorado, Connecticut, Delaware, the District of Columbia, Indiana, Iowa, Kentucky, Maine, Maryland, Massachusetts, Minnesota, Michigan, Missouri, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Vermont, Virginia, and West Virginia. Applicant also currently has pending, or plans to file, applications to provide telecommunications services in the following states in addition to Kansas: Arizona, Arkansas, California, Hawaii, Illinois, Louisiana, Nebraska, New Mexico, Oklahoma, and Texas. Please see **CONFIDENTIAL Exhibit C** for a list of the approximate number of customers in each state.

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

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, illustrating graphically the following information: Applicant is a Delaware limited liability company and wholly owned, indirect subsidiary of Zayo Group, which is a wholly owned, direct subsidiary of Zayo Group Holdings, Inc. (“Holdings” and together with its subsidiaries including Applicant,

“Zayo”). Zayo is a leading provider of bandwidth infrastructure and interconnection services over regional and metropolitan fiber networks. These services enable customers to manage, operate, and scale their telecommunications and data networks. Zayo customers consist primarily of wireless service providers, national and regional communications service providers, media/Internet/content companies, governments, banks, and other bandwidth-intensive enterprises. Zayo Group is authorized to provide competitive local exchange, competitive access, and/or interexchange services in the District of Columbia and every state except Alaska. In Kansas, Zayo Group is authorized to provide Local Exchange and Exchange Access Services, pursuant to a Certificate granted in Docket No. 11-ZAYC-561-COC on April 11, 2011, and Interexchange Services, pursuant to a Certificate granted in 11-ZAYC-562-COC on April 8, 2011. Zayo Group subsidiary ENA Healthcare Services, LLC is also authorized to provide Interexchange Services pursuant to a Certificate originally issued to TeleQuality Communications, Inc. in Docket No. 11-TQCC-5 96-COC on May 12, 2011.¹ Under the Zayo brand, Zayo Group’s primary telecommunications service offerings include high-capacity bandwidth services such as private line, Ethernet, and wavelength services. Under the Allstream brand, Zayo Group provides voice services, including TDM-based local exchange and interexchange voice and VoIP services.

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 ___ and omit the information called for in the schedule below.

Line No. (a)	Name of Stockholder (b)	Address (c)	No. of Shares (d)	No. of Votes (e)	Total Par or Stated Value (f)
1					

¹ TeleQuality Communications, Inc. subsequently changed its name to ENA Healthcare Services, LLC in accordance with an Order issued by the Commission in Docket No. 20-TQCC-418-CCN on April 23, 2020.

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.**

Attached as **Exhibit D** is an organizational chart illustrating the ownership structure of Applicant.

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

Applicant possesses the requisite financial resources to provide telecommunications services in Kansas. Applicant does not maintain financial statements separate from the consolidated financial statement of its parent company, Holdings. Thus, to demonstrate Applicant's financial qualification to operate in Kansas, Applicant provides financial information for Holdings as **CONFIDENTIAL Exhibits E-1 and E-2**.

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

Applicant (f/k/a Zayo Northeast, LLC) is a Delaware limited liability company formed on April 18, 2024. 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.

Applicant's primary point of contact for customer service is:

Donna Heaston
Senior Corporate Counsel
1401 Wynkoop Street, Suite 500
Denver, CO 80202
Tel: 763-745-8466
donna.heaston@zayo.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.)**

Not Applicable. Applicant is separately seeking a Certificate to provide local exchange telecommunications services.

- 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.)**

Please see Response to Question 18.

- 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 Company.

Granting this Application will promote the public interest by increasing competition in the provision of telecommunications services in Kansas. Applicant has the managerial and technical qualifications necessary to provide the proposed services in Kansas. Applicant is managed by a highly skilled team with substantial expertise and experience in the communications industry, including extensive telecommunications business, technical, and managerial expertise. Descriptions of the qualifications and backgrounds for the key personnel for Applicant's operations, including Applicant's officers and directors, are provided as **Exhibit B** as evidence that the Applicant possesses the technical and managerial capability necessary to provide high quality services to customers in Kansas. These biographies reflect management's substantial communications industry experience and expertise, and demonstrate that the Applicant possesses significant managerial and technical expertise operating a variety of communications services. Applicant expects to offer customers a wide array of services, thus providing Kansas consumers greater choice for innovative and technologically advanced telecommunications services, high

quality customer service, and competitive prices. Applicant will operate its networks and offer services designed to meet the individual needs of its enterprise and business customers in providing high quality services to their end user customers in an efficient and cost-effective manner.

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.

CONCLUSION

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,

By: /s/ John A. Kober
John A. Kober (KS Bar No. 11579)
MORGAN, LEWIS & BOCKIUS LLP
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
Tel: 214-466-4105
Fax: 214-466-4001
john.kober@morganlewis.com

Counsel for Zayo Network Services, LLC

Dated: July 8, 2025

LIST OF EXHIBITS

Exhibit A – Description of Applicant’s Operations

Exhibit B – Management Biographies of Applicant

Exhibit C – Applicant Customer Counts **[CONFIDENTIAL]**

Exhibit D – Ownership Structure of Applicant

Exhibit E – Financial Information of Applicant

Exhibit E-1 – Financial Statements of Holdings **[CONFIDENTIAL]**

Exhibit E-2 – Management Narrative **[CONFIDENTIAL]**

Exhibit F – Formation Documents of Applicant

Exhibit G – Certification of Authority to Transact Business of Applicant

Exhibit H – Telecommunications Carrier Code of Conduct

Oath

EXHIBIT A

Description of Applicant's Operations

- 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 is simultaneously filing a separate application for authority to provide local exchange and exchange access telecommunications services. Applicant plans to provide facilities-based point-to-point telecommunications services, such as Ethernet and other similar high-bandwidth services, for high-speed data transport. Applicant proposes to provide services primarily using its own facilities, which will be assigned from Zayo Group. Applicant will provide services to enterprise customers and to other communications providers on a wholesale basis and does not intend to directly serve residential customers. Applicant does not intend to offer voice services at the present time and does not seek authority to do so. 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 does not intend to have personnel located in Kansas. Responsibility for Kansas operations will be handled by Applicant's current management team from its Denver, Colorado 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 proposes to provide services primarily using its own facilities, which will be assigned from Zayo Group. Applicant does not currently own or lease facilities in Kansas. Applicant intends to provide its services using fiber optic cable along with other equipment and facilities to originate, terminate, and amplify signals.

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.

None of Applicant, its managing member, or its any of its officers have been or are currently the subject of any civil or criminal proceedings pending before any state or federal regulatory commission, administrative agency, or law enforcement agency that could adversely affect Applicant's ability to provide telecommunications services in Kansas.

EXHIBIT B

Applicant's Managerial Qualifications

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 the competitive interexchange telecommunications services requested in this Application in Kansas. Applicant's operations will be directed by a highly skilled team with substantial expertise and experience in the communications industry, including extensive telecommunications business, technical, and managerial expertise. Collectively, Applicant's key personnel have decades of experience operating and providing telecommunications services.

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

A description of the background of Applicant's key management personnel, which demonstrates the extensive telecommunications experience of Applicant's management team, is included with this exhibit.

Management Biographies

Steve Smith, Chief Executive Officer

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

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

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

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

Bill Long, Chief Product and Strategy Officer

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

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

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

Brian Daniels, Chief Sales Officer

Brian Daniels serves as Chief Sales Officer at Zayo. In this role, Brian is responsible for uniting sales teams across both direct and channel routes-to-market for Zayo. He leads a team of highly skilled executives responsible for the strategy and growth of Zayo's largest customers and verticals including the most impactful webscale, cloud, carrier and mobile network operators. He also oversees the growing education sales functions following Zayo's acquisition of Education Networks of America in 2022.

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

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

Bryan Fleming, Chief Information Officer

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

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

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

Jeff Noto, Chief Financial Officer

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

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

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

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

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

Julie Tschida Brown, Chief People and Culture Officer

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

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

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

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

Lauren Lantero, Chief Legal Officer

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

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

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

Nikos Katinakis, Chief Technology Officer

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

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

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

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

Troy Lupe, Chief Network Officer

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

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

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

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

Alan Heckler, Chief Innovation & Integration Officer

Alan Heckler serves as Executive Vice President and Chief Innovation & Integration Officer at Zayo Group. In this role, Alan is responsible for leading business-wide transformation efforts, bringing together strategy, operations, and technology to drive growth and innovation — including integrating Zayo's acquisition of Crown Castle's fiber assets.

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

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

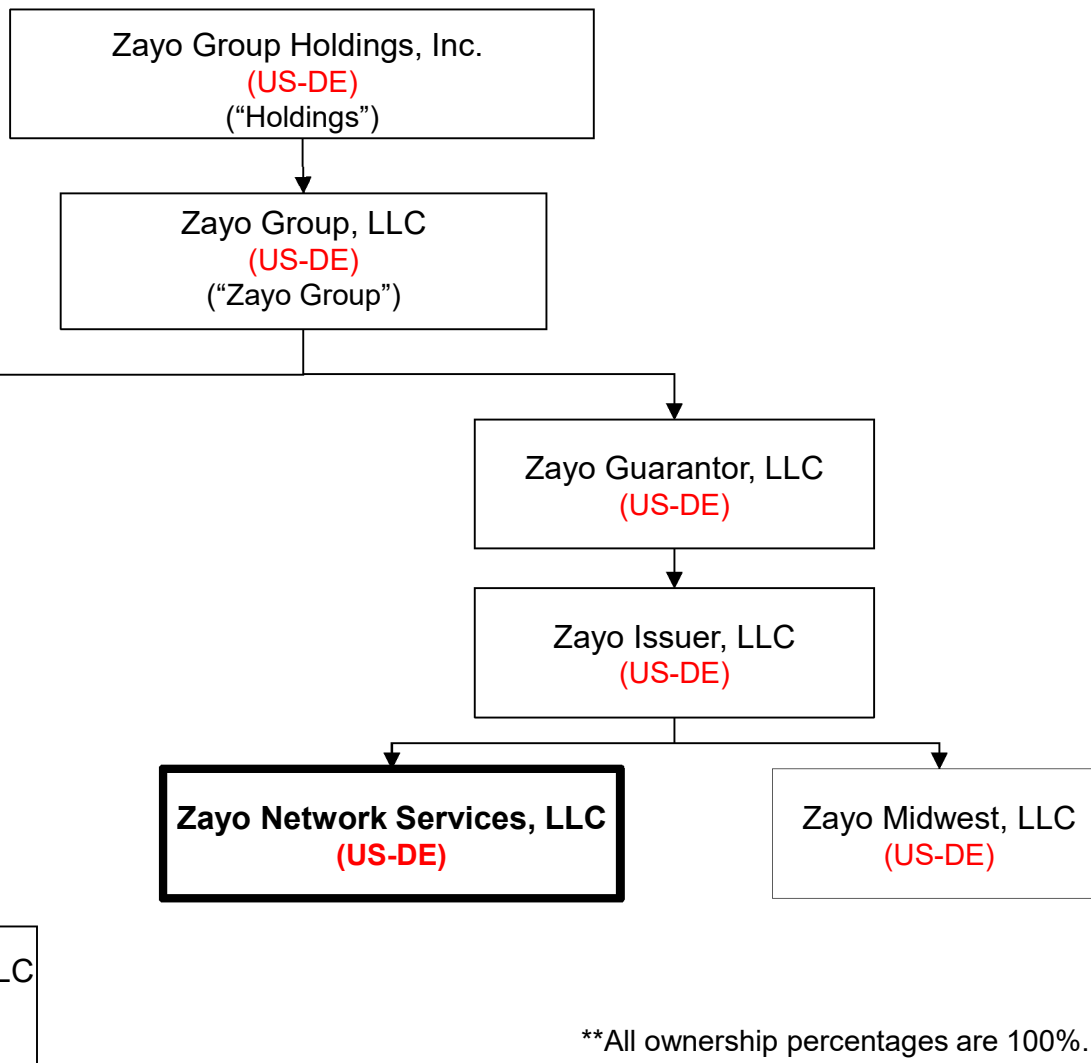
EXHIBIT D

Ownership Structure of Applicant

CORPORATE OWNERSHIP STRUCTURE***(Chart 1)**

(see Chart 2 for Ownership of Holdings)

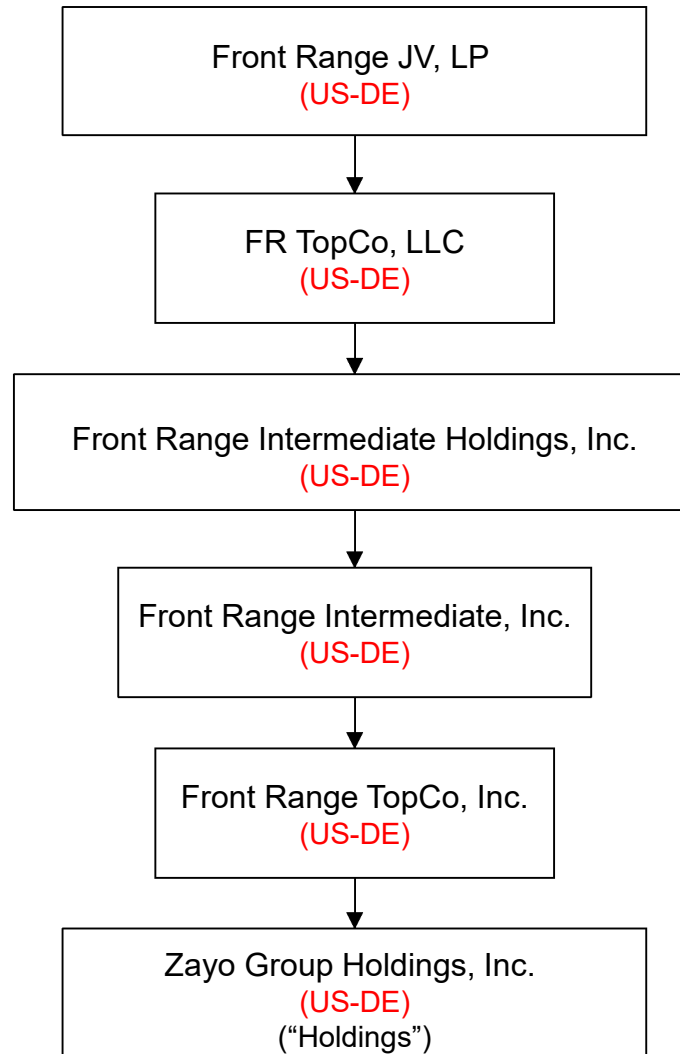
*The entities listed include (i) subsidiaries of Holdings that currently provide or may in the future provide intrastate, interstate or international telecommunications services in the United States, and (ii) those entities in their ownership chain. The chart excludes all other subsidiaries of Holdings.



**All ownership percentages are 100%.

CORPORATE OWNERSHIP STRUCTURE

(Chart 2)



(see Chart 1 for Subsidiaries of Holdings)

**All ownership percentages are 100%.

EXHIBIT E

Financial Statements of Applicant

Applicant's Financial Qualifications

Applicant possesses the requisite financial resources to provide telecommunications services in Kansas. Applicant does not maintain financial statements separate from the consolidated financial statement of its parent company, Holdings. Thus, to demonstrate Applicant's financial qualification to operate in Kansas, Applicant provides financial information for Holdings. For purposes of this Application, to demonstrate Applicant's financial qualification to operate in Kansas, Applicant provides as **CONFIDENTIAL Exhibit E-1** the audited financial statements of Holdings, including a balance sheet and income statement, for the immediately preceding three-year period.

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

Please see above.

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

Please see above.

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-2** for a narrative of significant activities that may have an impact on the financial statements.

CONFIDENTIAL EXHIBIT E-1

Financial Statements of Holdings

[REDACTED]

CONFIDENTIAL EXHIBIT E-2

Management Narrative

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT F

Formation Documents of Applicant

Delaware

The First State

Page 1

I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "ZAYO NETWORK SERVICES, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRD DAY OF JUNE, A.D. 2025.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "ZAYO NETWORK SERVICES, LLC" WAS FORMED ON THE EIGHTEENTH DAY OF APRIL, A.D. 2024.

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



3480494 8300

SR# 20252935819

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

A handwritten signature in black ink, reading "C. P. Sanchez", is written over a horizontal line.

Charuni Patibanda-Sanchez, Secretary of State

Authentication: 203841082

Date: 06-03-25

EXHIBIT G

Certificate of Authority to Transact Business of Applicant

Zayo Network Services, LLC
CSC

Business Name: Zayo Network Services, LLC
Business ID: 10037323

To keep the business in an active status, an information report is filed every two years with the Kansas Secretary of State. Businesses forming in even years file reports in each succeeding even year. Businesses forming in odd years file reports in each succeeding odd year. View information report due dates on the Secretary of State website.

FEDERAL LAW: Reporting of Beneficial Ownership Information to the Financial Crimes Enforcement Network (FinCEN)
Beginning January 1, 2024, federal law will require that certain types of corporations, limited liability companies, and other similar entities created in or registered to do business in the United States must report information about their beneficial owners—the persons who ultimately own or control the company—to the Department of the Treasury's Financial Crimes Enforcement Network (FinCEN).

Additional information about the reporting requirements is available on FinCEN's beneficial ownership information webpage, [FinCEN.gov/BOI](https://fincen.gov/BOI). You can also subscribe to FinCEN Updates for future guidance documents. FinCEN can be reached at 1-800-767-2825.

The Secretary of State's office is not collecting beneficial ownership information and does not have access to the information reported to FinCEN. The Secretary of State's staff cannot provide advice or legal counsel regarding FinCEN's beneficial ownership reporting requirements. You may wish to consult with professional service providers such as lawyers or accountants.



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FA

KANSAS SECRETARY OF STATE
Application for Registration
Foreign (non-Kansas) Business



Memorial Hall, 1st Floor
120 S.W. 10th Avenue
Topeka, KS 66612-1594

(785) 296-4564
kssos@ks.gov
<https://sos.ks.gov>

All information on the application for registration must be complete and accompanied by the correct filing fee or the document will not be accepted for filing.

1. Choose type of business:

☐ Corporation for profit
(fee \$115) 51-03

☐ Limited partnership
(fee \$165) 51-06

☐ Corporation not for profit
(fee \$115) 51-17

☐ Limited liability partnership
(fee \$165) 51-18

☒ Limited liability company
(fee \$165) 51-10

☐ Series limited liability company
(fee \$165) 51-33

2. Name of business:

Legal name registered in the foreign (non-Kansas) state or country.

(Do not include DBA, fictitious, assumed, or trade names)

Zayo Network Services, LLC

3. State or foreign country of jurisdiction:

Delaware

4. Name of resident agent:

Must be an individual, the business named in section 2, or a business already registered with our office. Do not leave blank.

Corporation Service Company

5. Registered office in Kansas for the resident agent:

Must be a street, rural route, or highway. A PO box is unacceptable.

Street Address (A PO Box is unacceptable)

1100 SW Wanamaker Rd. Suite 103

City

State

Zip

Topeka

KS

66604

6. Date the business began doing business in Kansas:

Month Day Year

Provide a date only if this date is in the past. Otherwise, leave blank.

7. Date of formation in the foreign (non-Kansas) state or county:

Month Day Year
4 18 2024

8. Full nature and character of business to be conducted in Kansas:

Telecommunications



Certified Date: 06/17/2025
Certificate Number: 20250617-267296



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9. This statement applies only to foreign limited liability companies who may create series in their domestic state and must check the corresponding statements. All other LLCs or business types may skip to section 10.

The limited liability company is governed by an operating agreement that establishes or provides for the establishment of a series of members, managers, limited liability company interests or assets having separate rights, powers or duties with respect to specified property or obligations of the foreign limited liability company or profits and losses associated with specified property or obligations.

Check all that apply:

☐

The debts, liabilities and obligations incurred, contracted for or otherwise existing with respect to a particular series, if any, are enforceable against the assets of such series only, and not against the assets of the foreign limited liability company generally or any other series thereof.

☐

Any of the debts, liabilities, obligations and expenses incurred, contracted for or otherwise existing with respect to the foreign limited liability company generally or any other series thereof shall be enforceable against the assets of such series.

The foreign business hereby consents, without power of revocation, that actions may be commenced against it in the proper court of any county in the state of Kansas; and the foreign business stipulates and agrees that such service shall be taken and held in all courts to be valid and binding as if due service had been made upon the authorized persons of the foreign business.

As of the day of this filing, the foreign business exists in good standing under the laws of the jurisdiction of its organization.

10. I declare under penalty of perjury pursuant to the laws of the state of Kansas that the foregoing is true and correct.

Signature of Authorized Person

X

DocuSigned by:

Gabriela Torresani

DBDF0CB04D814F3...

Name of Signer (Printed or Typed)

Zayo Issuer, LLC, Member, By: Gabriela Torresani, Asst. Secretary



Certified Date: 06/17/2025
Certificate Number: 20250617-267296

EXHIBIT H

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

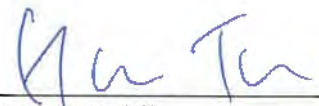
I, Lauren Lantero, of lawful age, and being first duly sworn, now state: As an officer of the Applicant, I am authorized to and do hereby make the above commitment. Further, I acknowledge that failure to comply with the above commitments or other lawful requirements of the Commission will subject Applicant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

State of Colorado
County of Denver



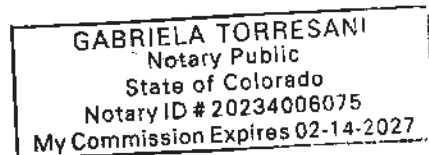
Lauren Lantero
Chief Legal Officer and
Secretary

Subscribed and sworn to before me on this 24th day of June, 2025.



Notary Public

Commission Expiration: 2-14-27



OATH

STATE OF COLORADO

§

§

COUNTY OF DENVER

§

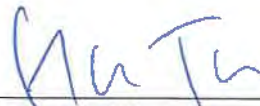
OATH

Lauren Lantero, being duly sworn, deposes and says that she is the Chief Legal Officer and Secretary of Zayo Network Services, LLC ("Applicant") and that the facts set forth in the foregoing application have been prepared under her direction, from the original books, papers and records of said company, that she examined same, and declares same to be true and correct to the best of her knowledge and belief. Further, that Applicant has full knowledge of the Kansas Corporation Commission's jurisdiction affecting local service providers and will comply with the applicable requirements of this Commission.



Lauren Lantero
Chief Legal Officer and Secretary
Zayo Network Services, LLC

Subscribed and sworn to before me this 29th day of June, 2025.



Notary Public

My commission expires 2-14-27

