

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

<b>In The Matter of the Application</b>	)	
<b>of IRU Networks, LLC</b>	)	
<b>for a Certificate of Service Authority to</b>	)	<b>Case No.</b>
<b>Provide Basic Local Exchange</b>	)	
<b>Telecommunications Services</b>	)	

**APPLICATION**

IRU Networks, LLC ("Applicant" or "IRU Networks"), an Oklahoma Limited Liability Company, seeks a certificate of service authority to provide basic local exchange telecommunications service and files this verified application pursuant to 4 CSR 240-2.060 and 240-3.510, respectfully requesting that the Missouri Public Service Commission ("Commission") issue an order that:

- (a) grants Applicant a Certificate of Service Authority to provide resold and facilities-based/UNE Basic Local Telecommunications Services in Portions of the State of Missouri pursuant to Sections 392.410 and 392.420 - 455<sup>1</sup>;
- (b) grants competitive status to Applicant pursuant to Section 392.361, and classifies the Applicant's services as competitive; and
- (c) waives certain Commission rules and statutory provisions pursuant to Section 392.420.

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<sup>1</sup> All statutory references are to the Missouri Revised Statutes (2000) as amended, unless otherwise noted.

In support of its request, Applicant states:

1. The legal name and principal office or place of business of the Applicant are:

IRU Networks, LLC  
3030 NW Expressway, Ste. 200-328  
Oklahoma City, Oklahoma 73112  
(888) 250-2111 (Phone)

A copy of Applicant's Certificate of Incorporation, and Certificate of Authority from the Missouri Secretary of State to transact business in Missouri are attached hereto as **Exhibit I**.

2. The name and address of Applicant's in-state attorneys are:

Diana Vuylsteke, Esq. (Mo Bar #42419)  
Bryan Cave LLP  
211 N. Broadway, Ste 3600  
St. Louis, MO 63102  
dmvuylsteke@bryancave.com

3. Applicant proposes to provide resold local telecommunications service within portions of the State of Missouri. Applicant is willing to comply with all applicable Commission rules and is willing to meet all relevant service standards, including, but not limited to, billing, quality of service and tariff filing and maintenance. Applicant proposes to provide services to prospective customers in exchanges currently served by Southwestern Bell Telephone Company, L.P. d/b/a AT&T Missouri; Embarq Missouri, Inc. d/b/a Embarq; CenturyTel of Missouri, LLC d/b/a CenturyTel; and Spectra Communications Group, LLC d/b/a CenturyTel, as set forth in the list of exchanges attached hereto as **Exhibit II**. Applicant will give consideration to equitable access for all Missourians, regardless of where they might reside or their income, to affordable telecommunications services in the proposed service area as set forth in Exhibit II, in accordance with applicable law.

4. When it initiates service in Missouri, IRU Networks, LLC, (IRU Networks) proposes to offer resold local exchange services obtained through commercial and/or

interconnection agreements. Such services will be provided by utilizing the facilities of incumbent local exchange carriers ("LECs"). The services IRU Networks intends to offer are likely to be those local exchange telecommunications services offered by incumbent local exchange carriers in the proposed service area. IRU Networks seeks authority to provide local exchange services that may include but are not limited to the following:

- \* Basic Exchange Services
- \* Custom Calling and Class Features (call waiting, caller ID, call forwarding, call blocking, speed calling, etc.)
- \* Adjunct Provided Features (voice messaging, etc.)
- \* Ancillary Services (911, E911, 411, Relay Service, directory listing, directory assistance, etc.)
- \* Centrex
- \* DSL and ISDN
- \* DID Trunks and Lines
- \* Private Lines

IRU Networks does not intend to install any switching equipment for the provision of local exchange service in the State of Missouri.

5. Applicant has the experience in the telecommunications industry and the technical and financial resources to provide telecommunications services within Missouri. A brief description of the qualifications and experience of the key management employees is attached hereto as **Exhibit III**, along with a description of the Applicant's telecommunications background. A copy of the financial information to demonstrate Applicant's financial ability to provide service is attached hereto as **\*\*PROPRIETARY\*\* Exhibit IV**. Exhibit IV contains confidential proprietary and financial information not generally available to the public. Due to

the highly competitive nature of the telecommunications marketplace, IRU Networks deems this material to be proprietary. Accordingly, the financial statements have been marked as confidential and are being submitted under seal to be maintained by the Commission and the Staff on a confidential basis. Attached hereto as well is the Affidavit of Donna Rice Costello, Chief Financial Officer, attesting that IRU Networks possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service.

6. Applicant is currently authorized to provide resold interexchange services in California, Georgia, Illinois, Massachusetts, Nevada, New York, and Texas. Applicant is currently authorized to provide resold competitive local exchange services in Massachusetts, Nevada, and New York. Applicant is in the process of applying for authorization to provide competitive local exchange and interexchange services Georgia. Applicant has not been denied authority for any of the services for which it seeks authority in this Application.

7. Applicant hereby respectfully requests a temporary waiver of 4 CSR 240-3.510(1)(C) that requires Applicant to file a draft tariff simultaneously with this application until Applicant has executed interconnection agreements with the incumbent LECs and those agreements have been approved by the Commission. Applicant will file its tariff with an effective date of at least 45 days after filing.

8. Applicant hereby respectfully requests classification as a competitive telecommunications company within the State of Missouri and receive a lesser degree of regulation as permitted by Sections 392.361 and 392.420. Applicant also requests that its services be classified as competitive. Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation. Granting of this application will allow greater price and service options for telephone users.

9. Applicant also respectfully requests, pursuant to Section 392.420, that the Commission waive the application of the following rules and statutory provisions as it relates to the regulation of Applicant:

**Statutes**

392.210.2 – Establish Uniform System of Accounts for Annual reports  
392.240.1 – Setting just and reasonable rates  
392.270 – Ascertain Property values  
392.280 – Establish Depreciation accounts  
392.290 – Issuance of securities  
392.300 – Transfer of Property and Acquisition of stock  
392.310 – Issuance of stock and debt  
392.320 – Stock Dividend Payment  
392.330 – Issuance of securities, debts and notes  
392.340 – Reorganization(s)

**Commission Rules**

4 CSR 240-3.520 – Applications to sell or transfer assets  
4 CSR 240-3.525 – Applications to merge or consolidate  
4 CSR 240-3.530 – Applications to issue stocks, obtain loans  
4 CSR 240-3.535 – Applications to acquire stock  
4 CSR 240-3.545(8)(C) – Listing of Waivers in Tariff  
4 CSR 240-3.550 – Telco Records and Reports, except (5)(B), (D) and (E)  
4 CSR 240-3.555 – Residential Customer Inquiries  
4 CSR 240-3.560 – Procedure for Ceasing Operations  
4 CSR 240-10.020 – Depreciation Records  
4 CSR 240-30.020 – Residential Telephone Underground Systems  
4 CSR 240-30.040 – Uniform System of Accounts  
4 CSR 240-32.010 – General Provisions  
4 CSR 240-32.040 – Metering, Inspections and Tests  
4 CSR 240-32.050 – Customer Services  
4 CSR 240-32.060 – Engineering and Maintenance  
4 CSR 240-32.070 – Quality of Service  
4 CSR 240-32.080 – Service objectives and surveillance levels  
4 CSR 240-32.090 – Connection of equipment and Inside Wiring  
4 CSR 240-32.100 – Provision of Basic Local Interexchange Services  
4 CSR 240-32.130-170 – Prepaid Calling Cards, except 32.140 and .150(1)  
4 CSR 240-32.180-190 – Caller ID blocking requirements  
4 CSR 240-33.010 – Service and Billing Practice General Provisions  
4 CSR 240-33.040 – Billing and Payment Standards  
4 CSR 240-33.045 – Clear identification and placement of charges on bills  
4 CSR 240-33.050 – Deposits  
4 CSR 240-33.060 – Residential Customer Inquiries  
4 CSR 240-33.070 – Discontinuance of service  
4 CSR 240-33.080 – Disputes by Residential Customers

- 4 CSR 240-33.090 – Settlement agreements with residential customers
- 4 CSR 240-33.130 – Operator service requirements
- 4 CSR 240-33.140 – Payphone requirements, except (2)
- 4 CSR 240-33.150 – Anti-slamming requirements
- 4 CSR 240-33.160 – Customer Proprietary Network Information

The above-referenced rules and statutory provisions have been waived to other carriers in prior cases.

10. Pursuant to Sections 392.470.1 and 392.361.6, the Company will undertake all necessary measures to ensure it will not, and its contracts with underlying carriers do not contain provisions preventing delivery of traffic to any telephone exchange area of Missouri. Such measures include but are not limited to:

- Prevention of call blocking and/or call gapping base on the cost of traffic termination.
- Preventing the alteration or stripping of Calling Party Number identification.
- Ensuring sufficient network capacity exists to process all traffic according to industry accepted practices.

11. As required by Section 386.570, Applicant will comply with all applicable Commission rules except those which are specifically waived by the Commission pursuant to a request filed by the Applicant.

12. All inquiries, correspondence, communications, pleadings, notices, orders and decisions relating to this case shall be addressed to Applicant's Missouri local counsel, identified above, and:

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
lsteinhart@telecomcounsel.com (E-Mail)

13. Applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application. No annual reports or assessment fees are overdue.

14. IRU Networks submits, notwithstanding the provisions of Section 392.500, as a condition of certification and competitive classification, IRU Networks agrees that, unless otherwise ordered by the Commission, IRU Networks originating and terminating switched exchange access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each ILEC within those service area(s) IRU Networks seeks authority to provide service. Additionally, pursuant to the Commission's Report and Order in Case No. TO-99-596, IRU Networks agrees that if the ILEC in whose service area IRU Networks is operating decreases its originating and/or terminating access service rates, IRU Networks shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates within thirty (30) days of the ILEC's reduction of its originating and/or terminating access rates in order to maintain the cap on switched exchange access rates.

15. Applicant submits the following arguments to demonstrate that the public interest will be served by the approval of this Application: the grant of a certificate to provide competitive basic local telecommunications services to the Applicant will serve the public interest. The Applicant's presence in the market will expand customer choice for telecommunications service. The increased competition brought by the Applicant to the market will have the effect of improving the quality of telecommunications services in Missouri and decreasing the cost of such services through increased innovation and efficiency. The result will be beneficial to economic development in Missouri. The granting of a certificate to the Applicant will contribute to the availability of reasonably affordable local exchange services in

the State of Missouri.

WHEREFORE, Applicant, IRU Networks, LLC, respectfully requests that the Missouri Public Service Commission grant it a certificate of service authority to provide resold and facilities-based/UNE Basic Local Telecommunications Services within portions of the State of Missouri. Applicant also respectfully requests classification as a competitive telecommunications company and requests that its services be classified as competitive. In addition, Applicant respectfully requests a waiver of the above-referenced rules and statutory provisions and a temporary waiver of the tariff filing requirement.

Respectfully submitted,

/s/ Lance J.M. Steinhart  
Lance J.M. Steinhart, Esq.  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200  
(770) 232-9208 (Fax)  
lsteinhart@telecomcounsel.com

and

/s/ Diana Vuylsteke  
Diana Vuylsteke, #42419  
Bryan Cave LLP  
211 N. Broadway, Ste 3600  
St. Louis, MO 63102  
(314) 259-2543  
(314) 259-2020 (Fax)  
dmvuylsteke@bryancave.com

Attorneys for Applicant  
IRU Networks, LLC



## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this 18th day of May, 2017, served a true copy of the foregoing Application upon the following, listed below, in accordance with Commission rules.

General Counsel  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102  
staffcounsel@psc.mo.gov

Office of the Public Counsel  
PO Box 7800  
Jefferson City, MO 65102  
opc@ded.mo.gov

/s/ Diana Vuylsteke/  
Diana Vuylsteke

## **EXHIBITS**

- |                    |  |
|--------------------|--|
| <b>Exhibit I</b>   | <b>Missouri Secretary of State Authorization and Articles of Organization, as Amended</b>            |
| <b>Exhibit II</b>  | <b>List of Exchanges</b>   |
| <b>Exhibit III</b> | <b>Executive Officers' Qualifications and Experience and Company's Telecommunications Background</b> |
| <b>Exhibit IV</b>  | <b>Financial Information</b>   |

**Exhibit I**

**Missouri Secretary of State Authorization  
Certificate of Incorporation**

# STATE OF MISSOURI



**Jason Kander**  
**Secretary of State**

## CERTIFICATE OF REGISTRATION


WHEREAS,

*IRU NETWORKS, LLC*  
*FL001418692*

existing under the laws of the State of Oklahoma has filed with this state its Application of Registration and whereas this Application of Registration conforms to the Missouri Limited Liability Company Act.

NOW, THEREFORE, I, JASON KANDER, Secretary of State of the State of Missouri, by virtue of the authority vested in me by law, do hereby certify and declare that on the 3rd day of January, 2017, the above Foreign Limited Liability Company is duly authorized to transact business in the State of Missouri and is entitled to any rights granted Limited Liability Companies.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 3rd day of January, 2017.

  
Secretary of State



## **Exhibit II**

### **List of Exchanges**

**AT&T Service Areas:**

<b>Adrian</b>	<b>Gideon</b>	<b>Risco</b>	<b>Hannibal</b>
<b>Advance</b>	<b>Glasgow</b>	<b>Rushville</b>	<b>Harvester</b>
<b>Agency</b>	<b>Grain Valley</b>	<b>St. Marys</b>	<b>High Ridge</b>
<b>Altenburg-Frohna</b>	<b>Gray Summit</b>	<b>San Antonio</b>	<b>Imperial</b>
<b>Antonia</b>	<b>Hayti</b>	<b>Scott City</b>	<b>Jackson</b>
<b>Archie</b>	<b>Herculaneum-Pevely</b>	<b>Senath</b>	<b>Joplin</b>
<b>Argyle</b>	<b>Higbee</b>	<b>Slater</b>	<b>Kennett</b>
<b>Armstrong</b>	<b>Hillsboro</b>	<b>Smithville</b>	<b>Kirksville</b>
<b>Ash Grove</b>	<b>Holcomb</b>	<b>Springfield</b>	<b>Knob Noster</b>
<b>Beaufort</b>	<b>Hornersville</b>	<b>St. Louis</b>	<b>Lake Ozark-Osage Beach</b>
<b>Bell City</b>	<b>Jasper</b>	<b>Stanberry</b>	<b>Manchester</b>
<b>Benton</b>	<b>Kansas City</b>	<b>Trenton</b>	<b>Marshall</b>
<b>Billings</b>	<b>Lamar</b>	<b>Tuscumbia</b>	<b>Maxville</b>
<b>Bismarck</b>	<b>La Monte</b>	<b>Versailles</b>	<b>Mexico</b>
<b>Bloomfield</b>	<b>Lancaster</b>	<b>Vienna</b>	<b>Monett</b>
<b>Bloomsdale</b>	<b>Leadwood</b>	<b>Walnut Grove</b>	<b>Moberly</b>
<b>Bowling Green</b>	<b>Lilbourne</b>	<b>Wardell</b>	<b>Neosho</b>
<b>Brookfield</b>	<b>Linn</b>	<b>Ware</b>	<b>Nevada</b>
<b>Campbell</b>	<b>Lockwood</b>	<b>Wellsville</b>	<b>Pacific</b>
<b>Cardwell</b>	<b>Louisiana</b>	<b>Westphalia</b>	<b>Perryville</b>
<b>Carl Junction</b>	<b>Macks Creek</b>	<b>Wyatt</b>	<b>Pond</b>
<b>Carrollton</b>	<b>Malden</b>		<b>Poplar Bluff</b>
<b>Caruthersville</b>	<b>Marble Hill</b>	<b>Bonne Terre</b>	<b>Richmond</b>
<b>Center</b>	<b>Marceline</b>	<b>Boonville</b>	<b>St. Charles</b>
<b>Chaffee</b>	<b>Marionville</b>	<b>Camdenton</b>	<b>St. Clair</b>
<b>Charleston</b>	<b>Marston</b>	<b>Cape Girardeau</b>	<b>St. Joseph</b>
<b>Clarksville</b>	<b>Meta</b>	<b>Carthage</b>	<b>Sedalia</b>
<b>Clever</b>	<b>Montgomery City</b>	<b>Cedar Hill</b>	<b>Sikeston</b>
<b>Climax Springs</b>	<b>Mourehouse</b>	<b>Chesterfield</b>	<b>Union</b>
<b>Deering</b>	<b>New Franklin</b>	<b>Chillicothe</b>	<b>Valley Park</b>
<b>DeKalb</b>	<b>New Madrid</b>	<b>DeSoto</b>	<b>Washington</b>
<b>Delta</b>	<b>Oak Ridge</b>	<b>Dexter</b>	<b>Webb City</b>
<b>Downing</b>	<b>Old Appleton</b>	<b>Eldon</b>	
<b>East Prairie</b>	<b>Oran</b>	<b>Eureka</b>	
<b>Edina</b>	<b>Patton</b>	<b>Excelsior Springs</b>	
<b>Elsberry</b>	<b>Paynesville</b>	<b>Farmington</b>	
<b>Essex</b>	<b>Pierce City</b>	<b>Fenton</b>	
<b>Farley</b>	<b>Pocahontas-New Wells</b>	<b>Festus-Crystal City</b>	
<b>Fayette</b>	<b>Portage Des Sioux</b>	<b>Flat River</b>	
<b>Fisk</b>	<b>Portageville</b>	<b>Fredericktown</b>	
<b>Frankford</b>	<b>Puxico</b>	<b>Fulton</b>	
<b>Freeburg</b>	<b>Quilin</b>	<b>Gravois Mills</b>	
	<b>Richwoods</b>	<b>Greenwood</b>	

**CenturyTel Service Areas:**

**Alton  
Ashland  
Augusta  
Ava  
Belle  
Bland  
Blue Eye  
Bourbon  
Bradleyville  
Branson  
Branson West  
Buffalo  
Cabool  
CapeFair  
Cassville  
Caulfield  
Cedar Creek  
Centralia  
Chamois  
Clark  
Columbia  
Conway  
Crane  
Cross Timbers  
Cuba  
Dardenne  
Defiance  
Dora  
Elkland  
Exeter  
Foley  
Fordland  
Foristell  
Forsyth  
Gainesville  
Galena  
Hallsville  
Hawk Point  
Hermann  
Hermitage  
High Hill**

**Highlandville  
Holstein  
Hurley  
Jamestown  
Jenkins  
Jonesburg  
KimberlingCity  
Koshkonong  
Leasburg  
Louisburg  
Mano  
Mansfield  
Marshfield  
Marthasville  
Morrison  
Moscow Mills  
Mount Sterling  
Mountain View  
New Melle  
Niangua  
O'Fallon  
Old Monroe  
Ozark  
Pittsburg  
Prairie Home  
Preston  
Protem  
Reeds Spring  
Rocheport  
RockawayBeach  
Safe  
Saint James  
Saint Peters  
Seymour  
Shell Knob  
Sparta  
Sturgeon  
Summersville  
Thayer  
Theodosia  
Thomasville**

**Troy  
Truxton  
Urbana  
Vichy  
Warrenton  
Washburn  
Wasola  
Wentzville  
West Plains  
Wheatland  
Willow Springs  
Winfield  
Wooldridge  
WrightCity**

**Embarq Service Areas:**

**AppletonCity  
Calhoun  
Chilhowee  
Dearborn  
Fairfax  
Holt  
KingCity  
MaltaBend  
Newburg  
Pickering  
Strasburg  
Tarkio  
Wellington**

**Blackburn  
Camden Point  
Clarksburg  
Deepwater  
Green Ridge  
Hopkins  
Kingsville  
Missouri City  
Norborne  
Sweet Springs**

**Blairstown  
Centertown  
Coal  
Edgerton  
Hardin  
Houstonia  
Leeton  
Montrose  
Orrick  
St. Thomas  
Syracuse  
Urich**

**Brazito  
Centerview  
Craig  
Eugene  
Henrietta  
Ionia  
Lincoln  
New Bloomfield  
Otterville  
Smithton  
Taos  
Waverly**

**Buckner  
Holden  
Lone Jack  
Pleasant Hill  
Tipton**

**Butler  
Kearney  
MoundCity  
Richland  
Waynesville**

**California  
LakeLotawana  
Russellville  
Weston**

**Cole Camp  
Lexington  
PlatteCity  
St. Robert  
Windsor**

**Clinton  
Lebanon  
Rolla**

**Ferrelview  
Maryville  
Salem**

**Ft. Leonard Wood  
Oak Grove  
Warrensburg**

**Harrisonville  
Odessa  
Warsaw**

**Jefferson City**



**CenturyTel Service Areas:**

Amazonia  
Annapolis  
Arcola  
Aurora  
AvenueCity  
Avilla  
Belgrade  
Bellevue  
Birch Tree  
Bolckow  
Boss  
Braymer  
Bronaugh  
Brunswick-Triplett  
Bunker  
Caledonia  
Cameron  
Canton  
Centerville  
Clarence  
Clarksdale  
Collins  
Concordia  
Cosby  
Dadeville  
Dalton  
Easton  
EdgarSprings  
El Dorado Springs  
Ellsinore  
Elmer  
Eminence  
Everton  
Ewing  
Fillmore  
Freemont  
GoldenCity  
Gorin  
Gower  
Greenfield  
Grove Spring  
Hamilton  
Hartville  
Helena  
Houston

Humansville  
Hunnewell  
Irondale  
Ironton  
Jericho Springs  
Kahoka  
Keytesville  
Kidder  
Kingston  
La Belle  
La Plata  
Laddonia  
Lagrange  
Lawson  
Lesterville  
Lewiston  
Licking  
LowryCity  
Macon  
Manes  
Maysville  
Milo  
MonroeCity  
Montauk  
Monticello  
Mount Vernon  
Mountain Grove  
Nebo  
Norwood  
Oates  
Osborn  
Osceola  
Palmyra  
Paris  
Perry  
Plattsburg  
Potosi  
Raymondville  
Revere  
Roby  
Rockville  
Rosendale  
Santa Fe  
Sarcoxie  
Savannah

SchellCity  
Shelbina  
Shelbyville  
Sheldon  
Stewartsville  
Stoutsville  
Timbers  
Trimble  
Turney  
Van Buren  
Vanzant  
Walker  
Wayland  
Weaubleau  
West Quincy  
Whitesville  
Winona

## **Exhibit III**

### **Executive Officers' Qualifications and Experience**

#### **Company's Telecommunications Background**

Donna Rice Costello has been part of the telecommunications industry these past 6 years concentrating in promotions and marketing at USA Digital. She also brings financial and management expertise to IRU Networks from her previous experience in the banking industry, and as a former president and board member of Sotos Syndrome Support Association, a national non-profit organization focused on providing education and assistance to families with special needs children.

Jere “Brent” West began his telecommunications career at the age of 16 by interning with Southwestern Bell and later attending AT&T’s executive training program. He joined USA Digital Communications in July 2002. Prior to that, Mr. West was President for North American for Inter.net Global. In addition, he was Technical Services Manager for PSINet, where he helped split off and later head the North American consumer division. Over the last 15 years Mr. West has sharpened his skills in product development, switch management and carrier relations and has brought this invaluable knowledge to IRU Networks.

**Exhibit IV**

**Financial Information**

**\*\*PROPRIETARY INFORMATION\*\***

State of Oklahoma )  
 )  
County of Oklahoma )  
 )

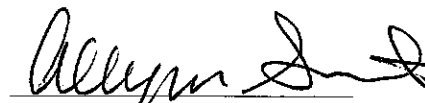
**VERIFICATION**

I, Donna Rice Costello, being duly sworn, declare that I am the Chief Financial Officer of IRU Networks, LLC, the Applicant. I verify that, based upon information and belief, I have knowledge of the statements in the foregoing Application, and I declare that they are true and correct.

  
Donna Rice Costello  
Chief Financial Officer

Sworn to before me, the undersigned Notary Public on this  
26 day of April, 2017.



  
Notary Public

Allyson Smith  
Print or Type Name

My commission expires: 7/26/18

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<b>for a Certificate of Service Authority to</b>	)	<b>Case No.</b>
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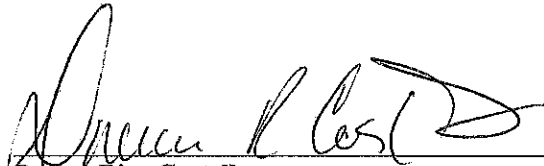
**AFFIDAVIT**

STATE OF Oklahoma       §  
                                     §  
COUNTY OF Oklahoma   §

I, Donna Rice Costello, of lawful age and being first duly sworn, do hereby depose and state that:

1. I am Chief Financial Officer of IRU Networks, LLC, the Applicant in the referenced matter, and am authorized to make this Affidavit on behalf of IRU Networks, LLC.
2. In my capacity as Chief Financial Officer, I have executive responsibilities for the day to day financial matters associated with IRU Networks, LLC.
3. IRU Networks, LLC possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service.
4. IRU Networks, LLC has not defaulted on any of its financial obligations within the last three years.

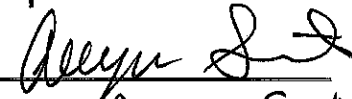
Further affiant sayeth not.

  
\_\_\_\_\_  
**Donna Rice Costello**  
**Chief Financial Officer**  
**IRU Networks, LLC**

Sworn to and subscribed before me this 26 day of April, 2017.

My commission expires:  
7/26/18



Notary Public   
Print or Type Name: Allyson Smith