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RECEIVED

November 23, 2016

NOV 23 2016

Via Hand-Delivery
Ms. Talina R. Matthews
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

PUBLIC SERVICE
COMMISSION

Re: Petition of IM Telecom, LLC D/B/A Infiniti Mobile for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky;
Case No. 2016-00276

Dear Ms. Matthews:

Enclosed for docketing with the Commission are an original and ten (10) copies of IM Telecom, LLC d/b/a Infiniti Mobile's Public Responses to the Commission's Second Requests for Information. Likewise, pursuant to 807 KAR 5:001 Section 7, IM Telecom, LLC d/b/a Infiniti Mobile has sought confidentiality on two of the responses and a corresponding Petition for Confidentiality is filed herewith. Additionally, the confidential version of the Data Request Responses is attached as well and marked "Confidential". Should you have any questions about this filing, please contact me at the number above.

Very truly yours,
HURT, DECKARD & MAY, PLLC



Matthew Malone

C: File
Enc.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
NOV 23 2016
PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

PETITION OF IM TELECOM, LLC
D/B/A INFINITI MOBILE FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS
CARRIER IN THE
COMMONWEALTH OF
KENTUCKY

Case No. 2016-00276

**PETITION FOR CONFIDENTIALITY OF
IM TELECOM, LLC D/B/A INFINITI MOBILE**

IM Telecom, LLC d/b/a Infiniti Mobile (“Infiniti Mobile”) respectfully submits this Petition for Confidentiality (“Petition”) for certain of its responses to the Second Request for Information (“Requests”) from the staff of the Kentucky Public Service Commission (“Commission” or “PSC”). Infiniti Mobile asks for confidentiality for its responses to one (1) data requests out of the seven (7) data requests propounded by Commission Staff on November 10, 2016. Infiniti Mobile makes this request pursuant to 807 KAR 5:001, Section 7 and KRS 61.878(1).

BACKGROUND

By this Petition, Infiniti Mobile requests that the Commission grant confidential protection to Infiniti Mobile’s response to Commission Staff’s Second Request for Information to IM Telecom, LLC d/b/a Infiniti Mobile, Question No. 5. These questions ask Infiniti Mobile to provide any additional information to demonstrate that Infiniti Mobile is financially and

technically capable of providing Lifeline-supported services, including but not limited to financial statements and revenue from sources other than universal service subsidies.

GROUNDS FOR PETITION

The Kentucky Open Records Act exempts from disclosure certain commercial information, including records generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records. *See* KRS 61.878(l)(c). Infiniti Mobile provides pre-paid wireless services targeting low-income consumers. That market is highly competitive, as consumers can choose among several pre-paid wireless carriers for affordable services in Kentucky.

As a closely held company operating in this competitive arena, if Infiniti Mobile were forced to disclose its confidential financial information as well as sources of credit in response to the aforementioned Question , competitors would be easily able to copy Infiniti Mobile's funding model or adjust operations to take undue advantage from any perceived financial vulnerability of Infiniti Mobile in offering wireless, Lifeline-supported services. Therefore, Infiniti Mobile's confidential disclosures relating to its financial information and certified sources of credit are highly confidential trade secret information subject to protection under the Kentucky Open Records Act.

The Commission has taken the position that the statute and the regulation require the party requesting confidentiality to demonstrate (1) actual competition and (2) the likelihood of competitive injury if the information is disclosed. Those requirements are easily met here.

1. Infiniti Mobile Faces Actual Competition

Infiniti Mobile plans to compete against other Kentucky Eligible Telecommunications Carriers ("ETCs") like Tennessee Telephone Service, LLC d/b/a Freedom Communications

USA, LLC, Smart Connections, Inc., and Absolute Home Phones, Inc., all of whom have been granted ETC status by this Commission. In addition, Infiniti Mobile faces stiff competition nationally in the provision of ETC low-income services from providers such as Tracfone and Virgin Mobile.

In light of this competition, disclosure of the information would hurt Infiniti Mobile in the marketplace because it would allow competitors to employ the same successful business model and seek out identical sources of credit Infiniti Mobile has acquired without the costs and time Infiniti Mobile has spent to develop its model and obtain certified lines of credit. As demonstrated herein Infiniti Mobile's sources of credit and financial information is inextricably intertwined with its business model and tax strategy. Thus, any public disclosure of this information would be a boon to Infiniti Mobile's competitors, who could then emulate its business plan and seek out credit from its certified creditors without the investments of time and money Infiniti Mobile has made.

In addition to the cost issue, disclosure of the information could allow Infiniti Mobile's competitors to injure it through misleading dissemination of the information to potential customers. Consumers choose providers based on a variety of factors, including their subjective impression about the business models and financial health of particular carriers. Public disclosure of proprietary information could easily cause competitive injury to Infiniti Mobile if the information were to be used selectively by a competitor. Such selective disclosure could take the form of drawing negative comparisons between Infiniti Mobile's business model and others.

2. Disclosure of the Information Will Likely Result in Competitive Injury

As a closely held, certified provider of wireless ETC services in six (6) states, Infiniti Mobile's business information is particularly sensitive and in need of protection from this Commission. As Infiniti Mobile faces intense competition in the low-income telecommunications services market both inside and outside of Kentucky, disclosure of the information would likely cause Infiniti Mobile serious competitive injury. The specific injury is: the hundreds of hours Infiniti Mobile spent developing its business model, consulting with independent tax advisors, and obtaining certified lines of external credit will be published for all of its competitors to review and copy without making any similar investments of their own. This would allow Infiniti Mobile's competitors to save time and money by copying this business model and quickly identify sources of credit, allowing those competitors to compete for and serve eligible Lifeline subscribers quickly and more cheaply as Infiniti Mobile current does and seeks to do. This in turn would allow those competitors to capture a greater share of the low-income services market, causing a corresponding decline in Infiniti Mobile's revenues.

A. Release of Infiniti Mobile's Information Would Meet the Kentucky PSC Standard of Likely Competitive Injury

The Commission has long recognized the highly competitive nature of wireless services as a reason to provide confidential treatment to information submitted to the Commission by wireless service providers. *See, e.g., In the Matter of ACC of Kentucky LLC's Petition for Confidential Protection*, Case No. 99-1 84 (January 24, 2000) (confidential treatment for intrastate gross revenue reports). More recently, the Commission extended blanket protection for all wireless carriers' access line count information submitted with monthly TRS and TAP reports. *Petition of the Kentucky Commission on the Deaf and Hard of Hearing*, Case No. 2007-00464 (April 16, 2009).

In *Hoy v. Kentucky Industrial Revitalization Authority*, 907 S.W.2d 766 (Ky. 1995), the Kentucky Supreme Court held that financial information submitted by General Electric Company with its application for investment tax credits was not subject to disclosure simply because it had been filed with a state agency. The Court applied the plain meaning rule to the statute, reasoning that “[i]t does not take a degree in finance to recognize that such information concerning the inner workings of a corporation is ‘generally recognized as confidential proprietary.’” *Id.* at 768. The same analysis applies here.

Infiniti Mobile is disclosing similar proprietary financial information about its revenues, internal tax strategy, and external sources of capital for future investment, and this information is capable of being misinterpreted and deliberately misused. Specifically, Infiniti Mobile’s competitors could review this confidential information and disseminate it to Infiniti Mobile’s current and prospective subscribers in a way that mischaracterizes it and criticizes Infiniti Mobile for paying out a significant portion of annual revenues in the form of management fees. In other words, competitors might allege that alternative business models are better or more reliable. A competitor could therefore use this confidential financial and credit information to disparage Infiniti Mobile or attempt to paint its operations in a false light.

B. Infiniti Mobile Has Invested Intensive Time and Effort Developing its Particular Business and Acquiring Sources of External Credit, Disclosure of Which Would Constitute Irreparable Competitive Injury

As a privately held company, Infiniti Mobile takes great effort to ensure that its business plan, tax strategy, and sources of credit remains confidential and is not disclosed publicly. Infiniti Mobile’s management has spent hundreds of hours and expended great sums of financial resources consulting with independent tax professionals in developing its particular business plan. Likewise, Infiniti Mobile management has spent hundreds of hours identifying

and negotiating with third parties to secure certified lines of external credit, should Infiniti Mobile need to invest in new equipment or operational expansion. The time and financial resources invested in these endeavors were, indeed, substantial.

As a result of this time and labor intensive process, Infiniti Mobile has developed an effective method of serving low-income wireless subscribers in Oklahoma, which it seeks to deploy throughout the Commonwealth of Kentucky. The time and investment Infiniti Mobile made to both secure sources of credit and develop its structure for allocating management fees allow Infiniti Mobile will enable it to more efficiently deploy its Lifeline services in jurisdictions in which it obtains designation as an ETC, including Kentucky, with minimal expenditure of additional time and money. Disclosure of Infiniti Mobile's confidential financial information and sources of external credit would provide our competitors with a roadmap to Infiniti Mobile's success; place a potential strain on creditor sources of capital; and simultaneously harm Infiniti Mobile's market position.

QUESTIONS FOR WHICH INFINITI MOBILE SEEKS CONFIDENTIALITY

As stated above, Infiniti Mobile only seeks confidential treatment for one (2) out of the seven (7) questions Commission Staff directed at Infiniti Mobile in their November 10, 2016 "Second Request for Information to IM Telecom, LLC d/b/a Infiniti Mobile" in the above-referenced docket. The question is the following:

Question No. 5.

In Question No. 5, Commission Staff asked the following:

Provide any additional information to demonstrate that Infiniti Mobile is financially and technically capable of providing Lifeline-supported services, including but not limited to financial statements and revenue from sources other than universal service subsidies.

Infiniti Mobile requests confidential treatment of this response and attached Exhibit 1 and Exhibit 2. These documents constitute confidential financial information because Infiniti Mobile's competitors in the telecommunications industry would obtain significant operational information from the disclosure of said response exhibits. Such financial information of Infiniti Mobile reflects its business model and unique sources of capital, which were the result of the time and labor process described above. The release of such information to the general public would place Infiniti Mobile at a competitive disadvantage in the Kentucky telecommunications marketplace. Specific information regarding the details of Infiniti Mobile's financial health and sources of capital is not generally known and is not readily discernable to third parties by any proper means.

Disclosure of this information to Infiniti Mobile's competitors would permit these entities to gain a significant competitive advantage over Infiniti Mobile by copying key aspects of its business plan, quickly identifying sources of capital investment, and enabling the dissemination of disparaging or misleading information regarding the health of Infiniti Mobile to current or prospective eligible Lifeline subscribers. Furthermore, Infiniti Mobile has taken all appropriate and legal measures to ensure that its financial information is disseminated only to those with a need to know, and that all measures have been taken to protect this information from disclosure when it is required to be filed in a public forum. Accordingly, this information should not be subject to disclosure to the public.

CONCLUSION

Infiniti Mobile is entitled to confidential protection for the information at issue and requests that the Commission confirm that it will not be disclosed. If the Commission disagrees, however, it must hold an evidentiary hearing (a) to protect the due process rights of

Infiniti Mobile and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter. *Utility Regulatory Commission v. Kentucky Water Service Company, Inc.*, 642 S.W.2d 591,592-94 (Ky. Ct. App. 1982). Infiniti Mobile further requests that it be afforded the right to withdraw the information at issue if the Commission disagrees that it should be kept confidential. *Sprint Communications Company, L.P.*, Case No. 2010-0012, Letter from Jeff Deroun, Executive Director, Kentucky Public Service Commission to John Hughes (February 12, 2010). Finally, in accordance with the provisions of 807 KAR 5:001(7), Infiniti Mobile is filing with the Commission one (1) set of the confidential information provided as part of its Second Data Request Responses to Commission Staff with the information highlighted and marked confidential and ten (10) sets of the Data Request Responses with the confidential information redacted.

Respectfully submitted,



Matthew Malone
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The Equus Building
127 West Main Street
Lexington, Kentucky 40507
Phone: (859) 254-0000

*Counsel for IM Telecom, LLC
d/b/a Infiniti Mobile*

RECEIVED

NOV 23 2016

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)

PETITION OF IM TELECOM, LLC D/B/A)
INFINITI MOBILE FOR DESIGNATION AS)
AN ELIGIBLE TELECOMMUNICATIONS)
CARRIER IN THE COMMONWEALTH)
OF KENTUCKY)
_____)

CASE NO.
2016-00276

**RESPONSE TO COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO IM TELECOM, LLC D/B/A INFINITI MOBILE**

PUBLIC VERSION

Pursuant to 807 KAR 5:001, IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile")
hereby submits its responses to the Kentucky Public Service Commission ("Commission")
Staff's Second Request for Information to IM Telecom, LLC, dated November 10, 2016.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 1

Responding Witness: Trevan Morrow, COO

1. The FCC's Third Report and Order, Further Report and Order, and Order on Reconsideration Adopted March 31, 2016¹ set forth minimum thresholds for Lifeline carriers offering voice service. The FCC determined that mobile carriers offering voice-only service should provide 1,000 minutes per month.² However the FCC did adopt a transition period beginning with an initial minimum of 500 minutes and increasing to 1,000 minutes on December 1, 2018.³ Beginning December 2, 2016, mobile voice carriers must offer at least 500 minutes per month to voice subscribers. Additionally the FCC ordered that mobile Lifeline providers must offer 500 MB of data per month beginning December 2, 2016.⁴ Explain and provide the plans that Infiniti Mobile will propose to offer in Kentucky beginning December 2, 2016 to meet these requirements.

Response:

1. Infiniti Mobile is aware of the minimum service standards for voice and both fixed and mobile broadband service, set forth in the *Third Report and Order*, and hereby commits to fully comply therewith. Specifically, as of December 2, 2016, and upon designation as an eligible telecommunications carrier ("ETC") in the Commonwealth of Kentucky, Infiniti Mobile intends to offer the following Lifeline plan:

Kentucky Lifeline 750 Plan – This plan will include 750 anytime voice minutes as well as 1700 text messages (SMS) per month to eligible subscribers. This plan will not include a broadband component, offering 0 gigabytes ("GB") of data usage per month. The retail price of this plan is \$12.75; however, after the application of all federal and state Lifeline discounts, the net cost to Lifeline customers will be \$0.00 per month. The Kentucky Lifeline 750 Plan will include a free phone; free calls to 911 emergency services; free calls to Infiniti Mobile customer service; free access to voicemail, caller-I.D., call-waiting, call-forwarding, and 3-way calling features; and free domestic, long-distance calling. Additional airtime is available for purchase, \$5.00 for 100 minutes or 100 text messages, and \$5.00 for 100 megabytes ("MB") of data usage.

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) ("*Third Report and Order*").

² *Id.*, paragraph 100.

³ *Id.*, paragraph 102.

⁴ *Id.*, paragraph 93.

[Response to Question No. 1, Continued]

In compliance with the *Third Report and Order*'s rules regarding forbearance from the requirement for Lifeline-only ETCs to offer broadband service beginning as of December 2,⁵ 2016, Infiniti Mobile intends to fully avail itself of said forbearance from the obligation to offer broadband service prior to 2019. Specifically, the *Third Report and Order* provides the following:

To facilitate program administration, we require any ETC that plans to not offer a Lifeline-discounted BIAS offering under the reforms in this Order to notify the [FCC] that it is availing itself of the forbearance relief granted in this section. Such notification must be filed by the later of 60 days after announcement of OMB approval of this requirement under the PRA or 30 days after receiving designation as a Lifeline-only ETC.⁶

Infiniti Mobile will fulfill this notice requirement to obtain forbearance by notifying the FCC that it is availing itself of forbearance from the requirement to offer broadband (or BIAS) service by December 2, 2016, by thirty (30) days following receipt of designation as a Lifeline-only ETC by this Commission.

⁵ *Id.*, paragraph 285 (“[E]xisting ETCs also retain the option to avail themselves of forbearance from the obligation to offer broadband.”); *see also Id.*, paragraph 298 (“[W]e forbear from Lifeline-only ETCs’ obligations to offer BIAS to permit such ETCs to solely offer voice if they so choose.”).

⁶ *Id.*, paragraph 301.

**IM TELECOM, LLC D/B/A INFINITI MOBILE
CASE NO. 2016-00276**

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 2

Responding Witness: Trevan Morrow, COO

2. The Kentucky Universal Service Fund provides \$3.50 per Lifeline subscriber per month. Provide the number of minutes that Infiniti mobile proposes to offer for Kentucky subscribers in addition to the minimums set forth by the FCC.

Response:

2. Currently, as proved in response to Question No. 1 above, Infiniti Mobile intends to offer a total of 750 anytime voice minutes per month for eligible subscribers, free of cost. Infiniti Mobile's Kentucky Lifeline 750 Plan includes the 500 anytime voice minutes required by the FCC, as outlined in its *Third Report and Order*, in addition to 250 anytime voice minutes offered to Kentucky subscribers, given the receipt of KUSF funds.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 3

Responding Witness: Trevan Morrow, COO

3. Given Infiniti Mobile's proposed Lifeline plans, explain how the plans will offer a competitive choice compared with other Lifeline providers in Kentucky.

Response:

3. Infiniti Mobile's Lifeline service is highly competitive in relation to the offerings of other ETCs in the Commonwealth of Kentucky, and Infiniti Mobile prides itself on exceptional customer service. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and to reduce the number of individuals not connected to the PSTN. Kentucky does not currently have as many active prepaid wireless carriers providing Lifeline service as do other states. Introducing Infiniti Mobile into the market as an additional wireless ETC provider will afford low-income Kentucky residents a wider choice of providers and available services, while simultaneously enhancing the competitive marketplace—and therefore the quality of benefits offered to consumers—as ETCs compete for a finite number of Lifeline-eligible customers. Furthermore, Infiniti Mobile's Lifeline service is comparable to the offers of other wireless ETCs in Kentucky, but instead of text messages detracting from available voice minutes, Infiniti Mobile's customers have an additional, separate allotment of text messages, which gives Infiniti Mobile a competitive edge. Infiniti Mobile will also set itself apart in other ways as the Company identifies market opportunities, such as desirable phone models, high standards of customer service, broadband offerings in the near future, etc. Infiniti Mobile anticipates that its service will increase the number of eligible Kentuckians receiving access to reliable voice, text, and data services throughout the Commonwealth. Given the Company's free service offering, and pre-paid nature of all additional airtime available to subscribers, no Lifeline subscriber will be disconnected from service for failure to pay a monthly invoice or bill. Furthermore, Infiniti Mobile will not pass state and local taxes and fees onto its subscribers in the form of increased prices or a monthly invoice.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 4

Responding Witness: Trevan Morrow, COO

4. Refer to Infiniti Mobile's Response to Commission Staff's First Request for Information, Question No. 2. Explain whether Infiniti Mobile is wholly dependent on universal service revenues when it states that over 99 percent of its customer base is Lifeline customers.

Response:

4. Infiniti Mobile is not wholly dependent on universal service revenues, as it also relies on revenues from retail and fee-based Lifeline plans offered in the State of Oklahoma, as well as revenues resulting from the sale of Top-Up airtime and handset devices. Beyond revenues obtained from the sale of telecommunications services, Infiniti Mobile also has access to lines of credit and capital from management, should financial needs arise.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 5

Responding Witness: Trevan Morrow, COO

5. Provide any additional information to demonstrate that Infiniti Mobile is financially and technically capable of providing Lifeline-supported services, including but not limited to financial statements and revenue from sources other than universal service subsidies.

Response:

5. Please see attached Exhibit 1, which includes unaudited financial statements for Infiniti Mobile for years 2013, 2014, and 2015. At this time, Infiniti Mobile does not have audited financial statements for the years requested. Exhibit 1 contains confidential and proprietary information origination with Infiniti Mobile management and accounting personnel, which, if made publicly available—as a privately held company—would result in direct financial harm and an unlawful competitive advantage for Infiniti Mobile's industry competitors. As such, Infiniti Mobile requests confidential treatment of its Exhibit 1. As Infiniti Mobile operates on the advice of its third-party tax advisors, much revenue are reflected as and paid out to Infiniti Mobile owners in the form of management fees. Said funds may be reinvested from time to time or as needed. Likewise, please see attached Exhibit 2, which is confidential and includes certified letters confirming additional lines of credit for Infiniti Mobile. The contents of Exhibit 2 are extremely sensitive and proprietary; as a closely held company, public disclosure of these letters would result in a competitive advantage for competitors and result in financial harms to Infiniti Mobile. Therefore, Infiniti Mobile requests confidential treatment for Exhibit 2.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 6

Responding Witness: Trevan Morrow, COO

6. Provide any updates as to whether Infiniti Mobile has begun providing service in any additional states or has received any additional Eligible Telecommunication Carrier designations since September 8, 2016.

Response:

6. Infiniti Mobile has not yet launched Lifeline service in any additional jurisdiction since September 8, 2016. However, Infiniti Mobile since September 8, 2016, Infiniti Mobile has received ETC designated in Georgia, on November 7, 2016. Please see attached Exhibit 3 for a copy of the Georgia Approval Order, issued by the Georgia Public Service Commission.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Question No. 7

Responding Witness: Trevan Morrow, COO

7. Refer to Infiniti Mobile's Response to Commission Staff's First Request for Information, Question No. 11. Explain whether Infiniti Mobile has plans to eventually expand its requested designation to include the rural areas of its underlying carriers' service areas.

Response:

7. No, not at this time.

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Responding Witness: Trevan Morrow, COO

EXHIBIT 1

**Unaudited Financial Statements of IM Telecom, LLC d/b/a Infiniti Mobile
for Years 2013, 2014, and 2015**

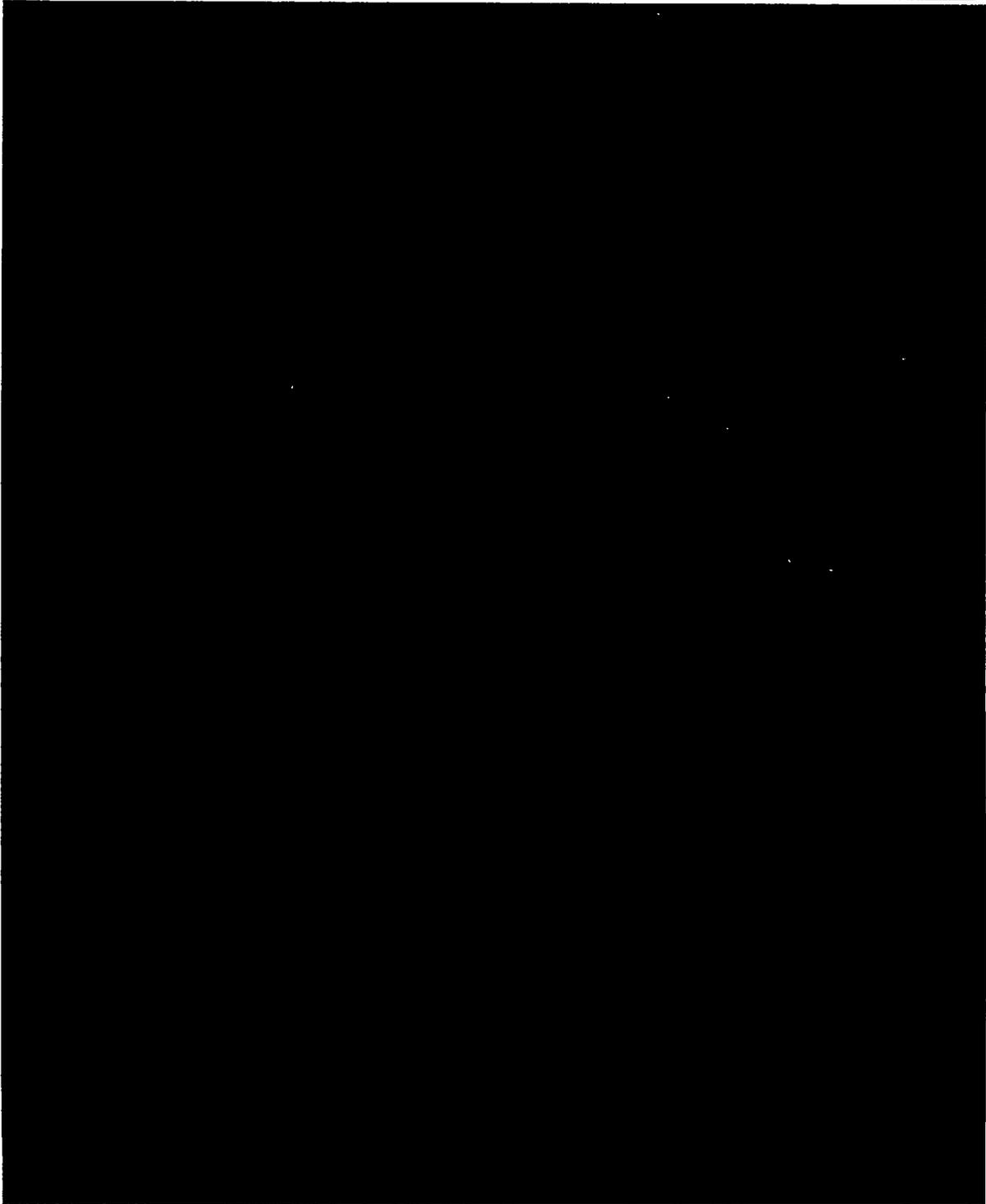
CONFIDENTIAL AND PROPRIETARY

IM Telecom LLC
Balance Sheet - Unaudited - Accrual Basis
Internal Management Report Only - CONFIDENTIAL

Jan - Dec 2013

Jan - Dec 2014

Jan - Dec 2015

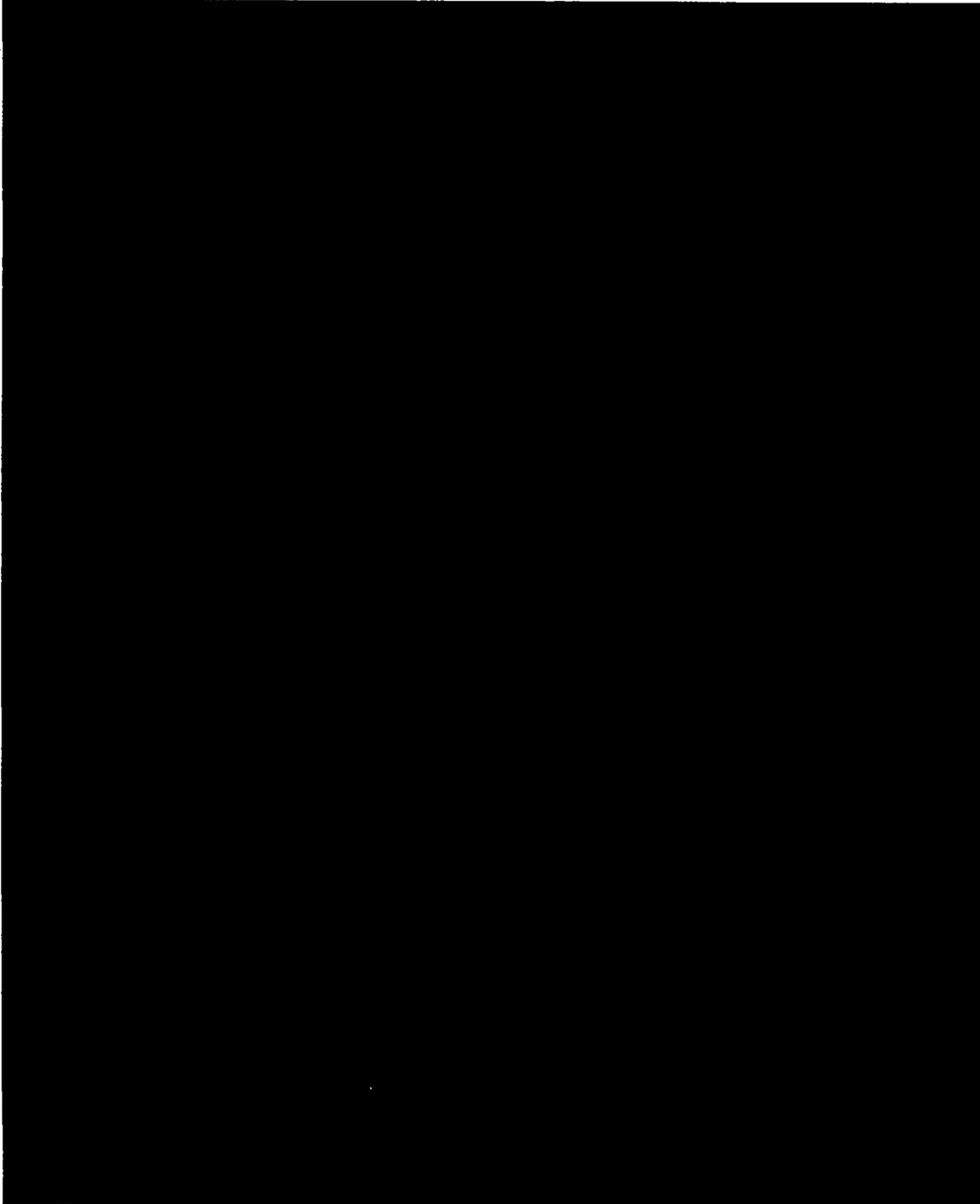


IM Telecom LLC
Profit and Loss - Unaudited - Accrual Basis
Internal Management Report Only - CONFIDENTIAL

Jan - Dec 2013

Jan - Dec 2014

Jan - Dec 2015

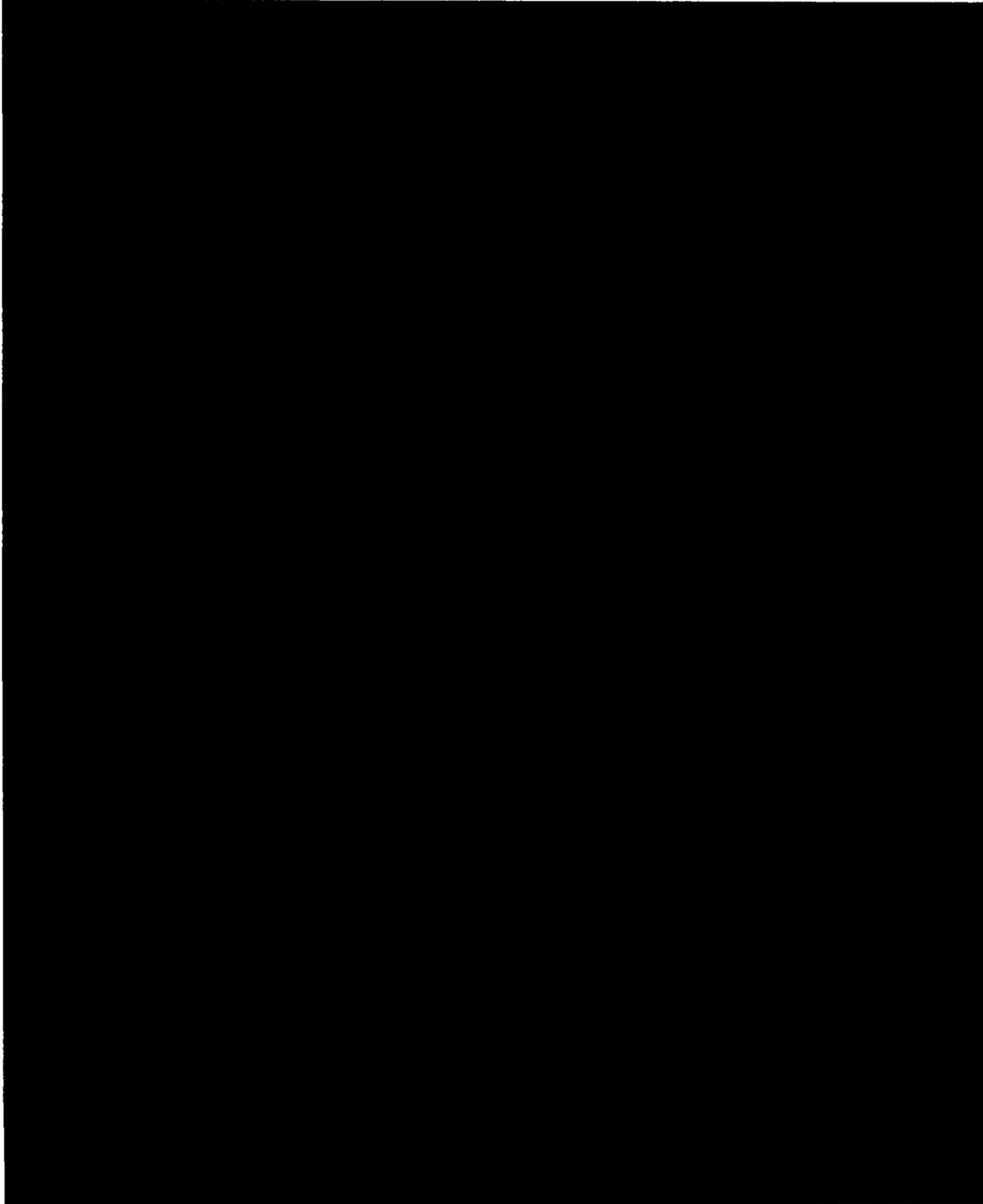


IM Telecom LLC
Profit and Loss - Unaudited - Accrual Basis
Internal Management Report Only - CONFIDENTIAL

Jan - Dec 2013

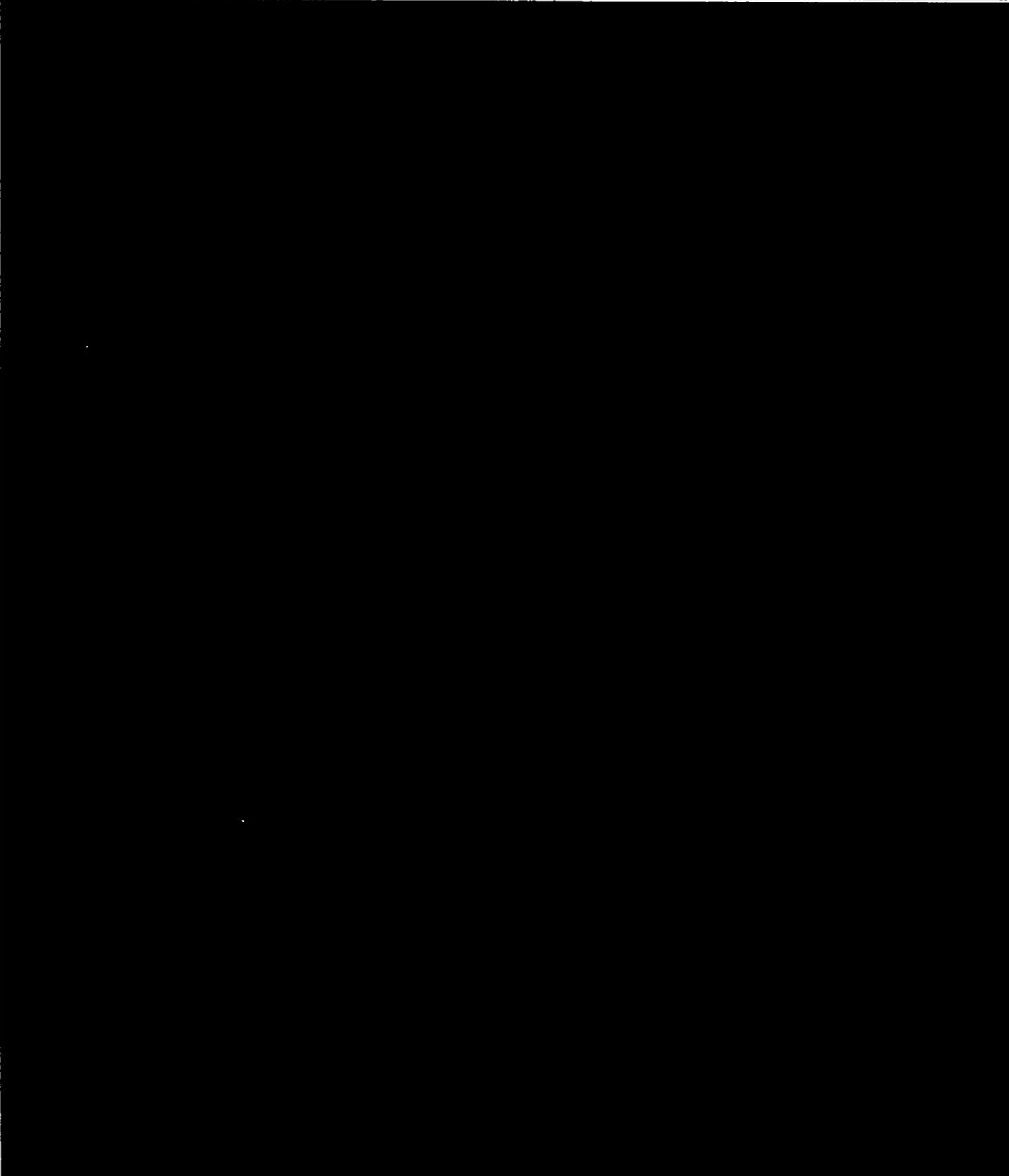
Jan - Dec 2014

Jan - Dec 2015



IM Telecom LLC
Statement of Cash Flows - Unaudited
Internal Management Report Only - CONFIDENTIAL

Jan - Dec 2013 Jan - Dec 2014 Jan - Dec 2015



**IM TELECOM, LLC D/B/A INFINITI MOBILE
CASE NO. 2016-00276**

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Responding Witness: Trevan Morrow, COO

EXHIBIT 2

Certified Letters of Credit for IM Telecom, LLC d/b/a Infiniti Mobile

CONFIDENTIAL AND PROPRIETARY

*Serving Your Wireless
Needs for Over 15 years!*

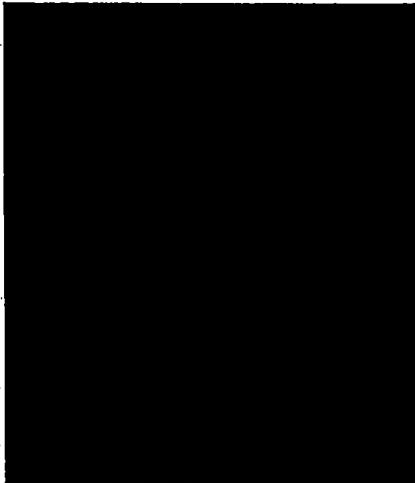
August 23, 2016

IM Telecom LLC DBA Infiniti Mobile
1705 S. Baltimore Ave,
Tulsa, OK 74119

Dear IM Telecom LLC DBA Infiniti Mobile,

This is to inform you that we have issued your company, IM Telecom LLC DBA Infiniti Mobile, a credit limit of [REDACTED] with standard credit terms to purchase mobile phones and accessories from our company, [REDACTED]

Thank you very much.



[REDACTED]

August 25, 2016

IM Telecom, LLC DBA Infiniti Mobile
1209 South Frankfort Ave Suite 200
Tulsa, OK 74120
Tel 918-607-7379

To whom it may concern,

IM Telecom, LLC DBA Infiniti Mobile currently has an [REDACTED] with
[REDACTED] IM Telecom, LLC DBA Infiniti Mobile, who has been a client
since January [REDACTED] continues to meet all financial obligations and requirements with
[REDACTED]

If you have any questions or need any additional information, please don't hesitate to
call.

Best regards,

[REDACTED]

[REDACTED]

IM TELECOM, LLC D/B/A INFINITI MOBILE

CASE NO. 2016-00276

**Response to Commission Staff's Second Request for Information
to IM Telecom, LLC d/b/a Infiniti Mobile**

Responding Witness: Trevan Morrow, COO

EXHIBIT 3

**Order of the State of Georgia Public Service Commission,
Designating IM Telecom, LLC d/b/a Infiniti Mobile as an ETC**

COMMISSIONERS:

CHUCK EATON, CHAIRMAN
AUREN "BUBBA" McDONALD, JR.
IM G. ECHOLS
H. DOUG EVERETT
STAN WISE



FILED

NOV 07 2016

EXECUTIVE SECRETARY
G.P.S.C.

DEBORAH I
EXECUT

REE
EXECUTIV

Georgia Public Service Commission

(404) 656-4501
(800) 383-5813

244 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334-5781

DOCKET# 40193

Docket No.

DOCUMENT# 165838

In Re: Application of IM Telecom, LLC d/b/a Infiniti Mobile for Designation as an Eligible Telecommunications Carrier in the State of Georgia

ORDER ON APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Background

On January 22, 2016, IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile") filed with the Georgia Public Service Commission ("Commission") its Application for Designation as an Eligible Telecommunications Carrier in the State of Georgia ("Application"). Infiniti Mobile filed responses to Staff's data requests on August 22, 2016 and supplemental responses on October 12, 2016.

Infiniti Mobile is not seeking Universal Service Fund ("USF") support for the purpose of providing service to high cost areas.

Infiniti Mobile asserts that it meets all the requirements of the Federal Communications Commission ("FCC") for designation as an ETC. 47 C.F.R. § 54.101(a) requires ETCs to provide the following services and functionality: voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organization, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers.

Infiniti Mobile's basic service offering is a wireless-based service, which includes up to 350 minutes of usage at no cost to the consumer, after application of the \$9.25 Lifeline discount. Additional usage may be purchased by Lifeline customers at a cost not to exceed \$0.10 per minute. Infiniti Mobile does not charge activation fees or any other non-recurring fees to initiate service

Infiniti Mobile requests ETC designation in the rural and non-rural wire centers shown in Attachment 1 to this order. On April 15, 2013, the FCC granted forbearance from the requirement of 47 U.S.C. § 214 (e)(5) and 47 C.F.R. § 54.207(b) that the service area of an eligible telecommunications carrier conform to the service area of any rural telephone company serving the same area. Forbearance is limited to Lifeline-only ETCs.

Infiniti Mobile also committed to "advertise the availability of such services and the charges therefor using media of general distribution." 47 U.S.C. §214(e)(1)(B). Infiniti Mobile submitted its proposed advertising, customer application, eligibility form, and verification form.

As Infiniti Mobile is a reseller, it requested from the FCC forbearance from the facilities requirements of 47 U.S.C. § 214 (e)(1)(A). The FCC granted forbearance to Infiniti Mobile on December 26, 2012.

Staff Recommendation

The Staff recommended that the Commission designate Infiniti Mobile as an ETC in the wire centers shown in Attachment 1 for the limited purpose of providing Lifeline service, subject to the following conditions:

- The Commission reserves the right to conduct audits as needed to determine that the funds are used for permitted purposes.
- Infiniti Mobile's ETC designation may at any time be suspended or revoked by order of the Commission.
- Infiniti Mobile shall include its zero-cost service offering with the greatest amount of included usage (i.e., minutes of use) in all Lifeline advertisements.

The Commission finds the Staff's recommendation reasonable and hereby adopts the Staff's recommendation.

* * * * *

WHEREFORE, it is

ORDERED, that Infiniti Mobile is granted ETC designation for the limited purpose of providing Lifeline service.

ORDERED FURTHER, that the Commission reserves the right to conduct audits as needed to determine that the funds are used for permitted purposes.

Order on Application for Designation as an Eligible Telecommunications Carrier

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ORDERED FURTHER, that Infiniti Mobile's ETC designation may at any time be suspended or revoked by order of the Commission.

ORDERED FURTHER, that Infiniti Mobile shall include its zero-cost service offering with the greatest amount of included usage in all Lifeline advertisements.

ORDERED FURTHER, that this ETC designation is conditioned upon Infiniti Mobile's compliance with applicable state law, applicable Commission rules and orders and applicable federal law, rules and regulations.

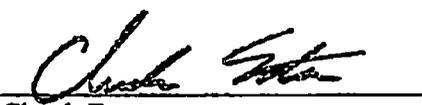
ORDERED FURTHER, that a motion for reconsideration, rehearing, oral argument, or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order(s) as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 1st day of November 2016.



Reece McAlistar
Executive Secretary



Chuck Eaton
Chairman

11-4-16

DATE

11/7/16

DATE

ATTACHMENT 1

WIRE CENTERS

<u>CLLI</u>	<u>COMPANY NAME</u>	<u>EXCHANGE NAME</u>
ACWOGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
AGSTGAU	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	AUGUSTA
AGSTGAFL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	AUGUSTA
AGSTGATH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	AUGUSTA
AIVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ADAIRSVILLE
ALPRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
AMRCGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	AMERICUS
APNGGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	APPLING
ASTLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
ATLNGAAD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGABH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGABU	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGACD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGACS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAEP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAFP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAGR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAHR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAIC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGALA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGASS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGATH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAWD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
ATLNGAWE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
BCHNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BUCHANAN
BGRTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BOGART-STATHAM
BNBRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BAINBRIDGE
BRMNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BREMEN
BRVIGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BARNESVILLE
BRWKGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BRUNSWICK
BUFRGABH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BUFORD
BWDNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	BOWDON
CHMBGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
CLHNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CALHOUN
CLMBGABV	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	COLUMBUS
CLMBGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	COLUMBUS
CLMBGAMW	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	COLUMBUS
CLMTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CLERMONT
CMNGGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CUMMING
CNYRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CONYERS
CORDGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CORDELE
CRTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CARROLLTON
CRVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CARTERSVILLE
CSSTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	CUSSETA
CVTNGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	COVINGTON
DBLNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	DUBLIN

DGVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
DLLSGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
DLTHGAHS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
DNWDGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA
FLBRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	FLOWERY BRANCH
FRBNGAEB	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
FRSYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	FORSYTH
FTVYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	FORT VALLEY
FYVLGASG	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
GNBOGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	GREENSBORO
GRFNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	GRIFFIN
GTVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	GRANTVILLE
HGVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	HOGANSVILLE
HMPNGAJW	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
HMTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	HAMILTON
HPHZGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	HEPHZIBAH
HRLMGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	HARLEM
JCSNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	JACKSON,GA
JKISGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	JEKYLL ISLAND
JNBOGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
KGTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	KINGSTON
LGRNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	LAGRANGE
LGVLGACS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
LLBNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
LRVLGAOS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
LSBGGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	LEESBURG
LTHNGAJS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
LULAGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	LULA
LYNSGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	LYONS
MACNGAGP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	MACON
MACNGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	MACON
MACNGAVN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	MACON
MCDNGAGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
MDSNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	MADISON
MRRWGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
MRTTGAEA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
MRTTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
NRCRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
NWNINGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	NEWMAN
PANLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
PLMTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
PNMTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	PINE MOUNTAIN
POLRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	POOLER
PTCYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
PWSPGAAS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
RCKMGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ROCKMART
RPVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ROOPVILLE
RSWLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
RTLGGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	RUTLEDGE
RVDLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
SCCRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SOCIAL CIRCLE
SENOGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SENOIA

Order on Application for Designation as an Eligible Telecommunications Carrier

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SMVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SMITHVILLE
SMYRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
SMYRGAPF	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
SNLVGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
SNMTGALR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
SPRKGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SPARKS
SSISGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ST SIMONS ISLAND
STBRGANH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA SOUTH
SVNHGADE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SAVANNAH
SVNHGAGC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SAVANNAH
SVNHGASI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SAVANNAH
SVNHGAWI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SAVANNAH
SYLVGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	SYLVESTER
TBISGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TYBEE ISLAND
TFTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TIFTON
THSNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	THOMSON
TLLPGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TALLAPOOSA
TMPLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TEMPLE
TUKRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHEAST
VDALGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	VIDALIA
VLRCGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	VILLA RICA
WDSTGACR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	ATLANTA NORTHWEST
WRRBGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	WARNER ROBINS
WRTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	WARRENTON
WTVLGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	WATKINSVILLE
AGSTGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE AUGUSTA
ALBYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE ALBANY
ATHNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE ATHENS
ATLNGAPP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE ATLANTA
BLCSGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE BLACKSHEAR
CDTWGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE CEDARTOWN
ETTNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE EATONTON
GSVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE GAINESVILLE
LKPKGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE LAKE PARK
PLHMGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE PELHAM
ROMEGATL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE ROME
SVNHGABS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE SAVANNAH
SVNHGAWB	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE SAVANNAH
THVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE THOMASVILLE
VLDSGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE VALDOSTA
WYBOGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE WAYNESBORO
WYCRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL	TE WAYCROSS
HOBKGAXA	BRANTLEY TELEPHONE CO., INC.	HOBOKEN
HRTSGAXA	BRANTLEY TELEPHONE CO., INC.	HORTENSE
NHNTGAXA	BRANTLEY TELEPHONE CO., INC.	NAHUNTA
WYVLGAXA	BRANTLEY TELEPHONE CO., INC.	WAYNESVILLE
ARSNAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., IN	ANDERSON
BRLTGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., IN	BROOKLET
CLTOGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., IN	CLITO
NVLSGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., IN	NEVILS
PRTLAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., IN	PORTAL
STSNGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., IN	STILSON

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STMYGAXA	CAMDEN TELEPHONE & TELEGRAPH CO., INC.	ST MARYS
CHCMGAXA	CHICKAMAUGA TELEPHONE CORP.	CHICKAMAUGA,GA
HGPNGAXA	CHICKAMAUGA TELEPHONE CORP.	HIGH POINT,GA
LKBLGAXA	CITIZENS TELEPHONE CO., INC.	LAKE BLACKSHEAR
VINNGAXA	CITIZENS TELEPHONE CO., INC.	VIENNA
HNVLGAXA	COASTAL UTILITIES, INC.	HINESVILLE
KLLRGAXA	COASTAL UTILITIES, INC.	RICHMOND HILL
MDWYGAXA	COASTAL UTILITIES, INC.	MIDWAY
RMHLGAXA	COASTAL UTILITIES, INC.	RICHMOND HILL
HWVLGAXA	COMSOUTH TELECOMM	HAWKINSVILLE
DARNGAXA	DARIEN TELEPHONE CO., INC.	DARIEN
EULNGAXA	DARIEN TELEPHONE CO., INC.	EULONIA
SPISGAXA	DARIEN TELEPHONE CO., INC.	SAPELO ISLAND
RNGRGAXA	FRONTIER COMMUNICATIONS OF FAIRMOUNT, LLC	RANGER
RGSTGAXA	FRONTIER COMMUNICATIONS OF GEORGIA, LLC	REGISTER
STBOGAXB	FRONTIER COMMUNICATIONS OF GEORGIA, LLC	STATESBORO
STBOGAXA	FRONTIER COMMUNICATIONS OF GEORGIA, LLC	STATESBORO
FLTNGAXA	GEORGIA WINDSTREAM, INC.	FOLKSTON
GRAYGAXA	GEORGIA WINDSTREAM, INC.	GRAY
HDDCGAXA	GEORGIA WINDSTREAM, INC.	HADDOCK
HMVLGAXA	GEORGIA WINDSTREAM, INC.	HOMERVILLE
LFYTGAXA	GEORGIA WINDSTREAM, INC.	LA FAYETTE
LKSNAXA	GEORGIA WINDSTREAM, INC.	LAKE SINCLAIR
NOBLGAXA	GEORGIA WINDSTREAM, INC.	NOBLE
RNCNGAXA	GEORGIA WINDSTREAM, INC.	RINCON
STGRGAXA	GEORGIA WINDSTREAM, INC.	ST GEORGE
HRWLGAXA	HART TELEPHONE CO.	HARTWELL
WSPNGAXA	INTERSTATE TELEPHONE CO.	WEST POINT
BGCPGAXA	NELSON - BALL GROUND TELEPHONE CO.	BIG CANOE
MRHLGAXA	NELSON - BALL GROUND TELEPHONE CO.	MARBLE HILL
NLSNGAXA	NELSON - BALL GROUND TELEPHONE CO.	NELSON-BALL GROUND
ELBLGAXA	PEMBROKE TELEPHONE CO., INC.	ELLABELLE
PMBRGAXA	PEMBROKE TELEPHONE CO., INC.	PEMBROKE
MTTRGAXA	PINELAND TELEPHONE COOPERATIVE, INC.	METTER
LZLLGAXA	PUBLIC SERVICE TELEPHONE CO.	LIZELLA
RNGLGAXB	RINGGOLD TELEPHONE CO.	RINGGOLD,GA
RSFWGAXA	TRENTON TELEPHONE CO.	RISING FAWN
TRENGAXA	TRENTON TELEPHONE CO.	TRENTON
WBRWGAXA	TRENTON TELEPHONE CO.	WEST BROW,GA
WVHLGAXA	WAVERLY HALL TELEPHONE, L.L.C.	WAVERLY HALL
CFVLGAXA	WILKES TELEPHONE & ELECTRIC CO., INC.	CRAWFORDVILLE
ADELGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	ADEL
ASBNGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	ASHBURN
BSTNGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	BOSTON
BYVLGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	BYROMVILLE
CHTTGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	COHUTTA
CHWOGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	CHATSWORTH
CNTNGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	CANTON
CNTNGAXB	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	CANTON
CRNVGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	CARNESVILLE
DLTNGAXB	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	DALTON
DLTNGAXC	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	DALTON

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DLTNGAXD	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	DALTON
ENLLGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	EASTANOLLEE
HAHRGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	HAHIRA
JSPRGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	JASPER
LAVNGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	LAVONIA
MDVLGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	MILLEDGEVILLE
MONRGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	MONROE
MRVLGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	MARSHALLVILLE
MRVNGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	MORVEN
PRRYGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	PERRY
TNHLGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	TUNNEL HILL
TOCCGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	TOCCOA
UNADGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	UNADILLA
WNDRGAXA	WINDSTREAM GEORGIA COMMUNICATIONS CORP.	WINDER
BATNGAXA	WINDSTREAM GEORGIA, INC.	BRASELTON
BYRNGAXA	WINDSTREAM GEORGIA, INC.	BYRON
CLBRGAXA	WINDSTREAM GEORGIA, INC.	COLBERT
CMRCGAXA	WINDSTREAM GEORGIA, INC.	COMMERCE
CNVLGAXA	WINDSTREAM GEORGIA, INC.	CENTERVILLE
HOMRGAXA	WINDSTREAM GEORGIA, INC.	HOMER
JFSNGAXA	WINDSTREAM GEORGIA, INC.	JEFFERSON
MYVLGAXA	WINDSTREAM GEORGIA, INC.	MAYSVILLE
NCSNGAXA	WINDSTREAM GEORGIA, INC.	NICHOLSON
PNDRGAXA	WINDSTREAM GEORGIA, INC.	PENDERGRASS
UNPNGAXA	WINDSTREAM GEORGIA, INC.	UNION POINT
WNVLGAXA	WINDSTREAM GEORGIA, INC.	WINTERVILLE
BGCNGAXA	WINDSTREAM STANDARD, INC.	BIG CANOE
CLEVGAXA	WINDSTREAM STANDARD, INC.	CLEVELAND
CLVLGAXA	WINDSTREAM STANDARD, INC.	CLARKESVILLE
CRNLGAXA	WINDSTREAM STANDARD, INC.	CORNELIA
DHLNGAXA	WINDSTREAM STANDARD, INC.	DAHLONEGA
DWVLGAXA	WINDSTREAM STANDARD, INC.	DAWSONVILLE
DWVLGAXB	WINDSTREAM STANDARD, INC.	DAWSONVILLE
HELNGAXA	WINDSTREAM STANDARD, INC.	HELEN
HWSSGAXA	WINDSTREAM STANDARD, INC.	HIAWASSEE
YNHRGAXA	WINDSTREAM STANDARD, INC.	YOUNG HARRIS

State of Oklahoma)
)
County of Tulsa)

CERTIFICATION

Personally appeared before the undersigned, an officer duly authorized to administer oaths, I, Trevan Morrow, first being duly sworn, depose and state that I am COO of IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile" or the "Company") and that I am authorized to make this Certification on behalf of Infiniti Mobile.

On behalf of Infiniti Mobile, I certify the following:

1. The contents of the foregoing Response to Commission Staff's Second Request for Information to IM Telecom, LLC D/B/A Infiniti Mobile are true and correct to the best of my knowledge, information, and belief.

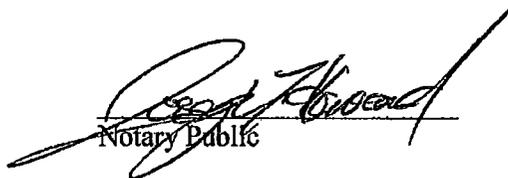
Dated: 11-21-16



Trevan Morrow, COO
IM Telecom, LLC d/b/a Infiniti Mobile

Subscribed and sworn to before me this 21 day of November, 2016.

(Notary Seal)



Notary Public

My commission expires: _____

