



Judith A. Riley

12316 Hidden Forest Boulevard  
Oklahoma City, OK 73142

November 15, 2012

**VIA Electronic Submission**

David Danner, Executive Director/Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250  
360-664-1234

RE: Zone Telecom, LLC – UBI 602-054-972 and Certificate No. UT-001362  
Authority Expansion Request to Include Local Exchange with Existing IXC

Dear Mr. Danner:

Zone Telecom, LLC (“Zone”) respectfully notifies the Washington Utilities and Transportation Commission of its intention to expand its current service offerings to include Local Exchange voice and data services provisioned through resale agreements. Zone is currently registered as an Interexchange Carrier in Washington.

Zone plans to provision hosted iPBX by way of VoIP technology through multiple interfaces including Cable Modem, DSL, Ethernet, MPLS, and others. Private Internet connections will also be made available. Some bundled offerings will include the resold local access circuit.

Enclosed with this registration is a copy of Zone’s Washington Certificate of Authority, their Claim of Confidentiality, a redacted public version of their 2011 Balance Sheet, a Confidential, unredacted version of their 2011 Balance Sheet which is confidential per WAC 480-07-160, and a copy of Zone’s 2011 Annual Report to the UTC.

Should there be any questions or additional information required, please do not hesitate to contact me at (405) 755-8177 ext. 25, or by email at [mdean@telecompliance.net](mailto:mdean@telecompliance.net)

Sincerely,

A handwritten signature in black ink that reads "Matt Dean". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Matt Dean  
Regulatory Agent



**Registered Agent** (A Washington Agent is required if the company is located outside Washington State):

Name: Corporation Trust Company  
Mailing Address: 30 Deschutes Way SW, STE 304  
City/State/Zip: Tumwater, WA 98501  
Phone Number: unknown

**Name, address and title of each officer or director (attach additional pages if needed)**

<u>Name</u>	<u>Address</u>	<u>Title</u>
David Lewis	3130 Pleasant Run Springfield, IL 62711	CEO
Joseph O'Hara	3130 Pleasant Run Springfield, IL 62711	CFO
Eamon Egan	3130 Pleasant Run Springfield, IL 62711	VP

**Regulatory Contact:**

Name: Joseph O'Hara  
Mailing Address: 3130 Pleasant Run Springfield, IL 62711  
Phone Number: 217-698-2860  
E-mail: regulatoryaffairs@anpisolutions.com  
Fax Number: 217-698-0100

**Consumer Questions and/or Complaint Contact:**

Name: Heidi May Young  
Title: Customer Service Manager  
Phone Number: 877-366-2674  
E-mail: customerservice@anpisolutions.com  
Fax Number: 217-698-0100

**Emergency Contact:**

Name: Joseph O'Hara  
Title: Chief Financial Officer  
Phone Number: 214-698-2860  
E-mail: johara@anpisolutions.com  
Fax Number: 217-698-0100

**Telecommunication services that will be provided (check all that apply):**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Local Exchange Service (Resale)  | <input checked="" type="checkbox"/> Data Services |
| <input type="checkbox"/> Calling Cards   | <input type="checkbox"/> Prepaid Calling Cards    |
| <input type="checkbox"/> Alternate Operator Services   | <input type="checkbox"/> Directory Assistance     |
| <input checked="" type="checkbox"/> Long Distance Interlata  | <input type="checkbox"/> WATS (800/888)           |
| <input checked="" type="checkbox"/> Long Distance Intralata  |   |
| <input checked="" type="checkbox"/> Other, please specify <u>VoIP and hosted PBX; internet connections</u> |   |

# List of Exhibits

Exhibit A	Washington Certificate of Authority
Exhibit B	2011 Financial Statements
Exhibit B-1	Claim of Confidentiality
Exhibit B-2	2011 Balance Sheet – Public, Redacted Version
Exhibit B-3	2011 Balance Sheet – <b>Confidential</b> per WAC 480-07-160
Exhibit C	Zone Telecom, LLC's 2011 Annual Report

# **Exhibit A**

Washington Certificate of Authority



**Foreign Profit Corporation**  
See attached detailed instructions

- Filing Fee \$30.00
- Filing Fee with Expedited Service \$80.00

This Box For Office Use Only

05/27/11 1950008-001  
\$130.00 K #1685  
id: 2110182

**FILED**  
**SECRETARY OF STATE**  
**SAM REED**  
**MAY 27, 2011**  
**STATE OF WASHINGTON**

UBI Number: 602054972

### AMENDED CERTIFICATE OF AUTHORITY

Chapter 23B.10 RCW

#### SECTION 1

**NAME OF CORPORATION:** (as currently recorded with the Office of the Secretary of State)  
Zone Telecom, Inc.

**NAME TO BE USED IN WASHINGTON STATE:** (If different than above, resolution must be attached)

#### SECTION 2

**STATE OR COUNTRY WHERE ORIGINALLY INCORPORATED:** Delaware

**DATE CERTIFICATE OF AUTHORITY WAS ISSUED IN WASHINGTON:** 07/27/2000

#### SECTION 3

**AMENDMENTS TO CERTIFICATE:** (If necessary, attach additional information)

Zone Telecom, Inc., a foreign corporation incorporated in Delaware, hereby converts to a limited liability company in the state of Washington by name of Zone Telecom, LLC, a foreign limited liability company incorporated in Delaware.

*In the event the change or changes include a name change to a name that does not meet the requirements of RCW 23B.15.060, a fictitious name for use in Washington, include a copy of the resolution of the board of directors, certified by the corporation's secretary, adopting the fictitious name; and a copy of the document filed in the state or country of incorporation showing that jurisdiction's "filed" stamp.*

#### SECTION 4

**SIGNATURE** (see Instructions page)

*This document is hereby executed under penalties of perjury, and is, to the best of my knowledge, true and correct.*

X Jan Egan  
Signature

Eamón P.M. Egan, Secretary

04/15/2011

Printed Name/Title

Date

Phone Number

# Delaware

PAGE 1

*The First State*


I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF CONVERSION OF A DELAWARE CORPORATION UNDER THE NAME OF "ZONE TELECOM, INC." TO A DELAWARE LIMITED LIABILITY COMPANY, CHANGING ITS NAME FROM "ZONE TELECOM, INC." TO "ZONE TELECOM, LLC", FILED IN THIS OFFICE ON THE TWENTY-FOURTH DAY OF MARCH, A.D. 2011, AT 6:38 O'CLOCK P.M.



3242585 8100V

110607447

You may verify this certificate online  
at [corp.delaware.gov/eauthver.shtml](http://corp.delaware.gov/eauthver.shtml)

  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 9784145

DATE: 05-24-11

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 06:38 PM 03/24/2011  
FILED 06:38 PM 03/24/2011  
SRV 110338521 - 3242585 FILE

STATE OF DELAWARE  
CERTIFICATE OF CONVERSION  
FROM A CORPORATION TO A  
LIMITED LIABILITY COMPANY PURSUANT TO  
SECTION 18-214 OF THE LIMITED LIABILITY ACT

1. The jurisdiction where the Corporation first formed is Delaware.
2. The jurisdiction immediately prior to filing this Certificate is Delaware.
3. The date the corporation first formed is June 13, 2000.
4. The name of the Corporation immediately prior to filing this Certificate is Zone Telecom, Inc.
5. The name of the Limited Liability Company as set forth in the Certificate of Formation is Zone Telecom, LLC.

IN WITNESS WHEREOF, the undersigned have executed this Certificate on the 24th day of March, A.D. 2011.

By: Eamon P.M. Egan  
Eamon P.M. Egan, Authorized Person



# Delaware

PAGE 2

*The First State*


I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THAT THE ATTACHED IS A TRUE AND CORRECT COPY OF CERTIFICATE OF FORMATION OF "ZONE TELECOM, LLC" FILED IN THIS OFFICE ON THE TWENTY-FOURTH DAY OF MARCH, A.D. 2011, AT 6:38 O'CLOCK P.M.

3242585 8100V

110607447

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)



  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 8784145

DATE: 05-24-11

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 06:38 PM 03/24/2011  
FILED 06:38 PM 03/24/2011  
SRV 110338521 - 3242585 FILE

**CERTIFICATE OF FORMATION  
OF  
ZONE TELECOM, LLC**

The undersigned, an authorized natural person, for the purpose of forming a limited liability company, under the provisions and subject to the requirements of the State of Delaware (particularly Chapter 18, Title 6 of the Delaware Code and the acts amendatory thereof and supplemental thereto, and known, identified, and referred to as the "Delaware Limited Liability Company Act"), hereby certifies that:

FIRST: The name of the limited liability company (hereinafter called the "limited liability company") is Zone Telecom, LLC.

SECOND: The address of the registered office and the name and the address of the registered agent of the limited liability company required to be maintained by Section 18-104 of the Delaware Limited Liability Company Act are the Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation as of March 24th, 2011.

  
Eamon P.M. Egan

# **Exhibit B**

2011 Financial Statements

# **Exhibit B-1**

Claim of Confidentiality



Judith A. Riley

12316 Hidden Forest Boulevard  
Oklahoma City, OK 73142

## Claim of Confidentiality

Zone Telecom, LLC is not a publicly traded company. As such, Zone Telecom, LLC does not file financial statements with the SEC. The submitted financial statements contain sensitive financial information, which Zone Telecom, LLC protects from disclosure. This information is not generally available to those inside the Company without specific need-to-know, and the Company keeps it in a secure location to prevent inadvertent disclosure. This information has not been released previously. Public disclosure of the information would cause undue harm to Zone Telecom, LLC and would prove detrimental to Zone Telecom, LLC's competitive position in the marketplace.

Due to the sensitive nature of this information, it is appropriate for the Commission to limit access to the information. The confidential information is being provided for the sole use of the Commission in exercising their respective governmental functions by examining the Application. There is no legitimate purpose to be served in disclosing this proprietary material to any person other than the appropriate reviewing staffs of the Commission.

Zone Telecom, LLC respectfully moves that the Commission treat EXHIBIT B-3 of the Application as confidential and protect the aforementioned documents as proprietary and confidential.

Respectfully submitted this 15<sup>th</sup> day of November, 2012,

Matt Dean, Regulatory Consultant  
(405) 755-8177 x 25  
mdean@telecompliance.net

# **Exhibit B-2**

2011 Balance Sheet

Public, Redacted Version

Zone Telecom, LLC  
Balance Sheet  
December 31, 2011

**PUBLIC, REDACTED VERSION**

**ASSETS**

December 31, 2011

Cash and cash equivalents  
Accounts receivable (net)  
Due from affiliate  
Other current assets  
Net fixed assets  
Net intangible assets  
Other long term assets

REDACTED  
REDACTED  
REDACTED  
REDACTED  
REDACTED  
REDACTED  
REDACTED

Total Assets

REDACTED

**LIABILITIES AND EQUITY**

Accounts payable  
Current portion of long-term debt  
Other current liabilities  
Long-term debt  
Capital contribution  
Retained earnings

REDACTED  
REDACTED  
REDACTED  
REDACTED  
REDACTED  
REDACTED

Total liabilities & equity

REDACTED

# **Exhibit B-3**

2011 Balance Sheet

**Confidential** per WAC 480-07-160

**FILED SEPARATELY UNDER  
CONFIDENTIAL SEAL**



# **Exhibit C**

Zone Telecom, LLC's 2011 Annual Report

2  
0  
1  
1

# TELECOMMUNICATIONS COMPANIES ANNUAL REPORT Due May 1, 2012

T6566  
Zone Telecom, LLC  
3130 Pleasant Run  
Springfield, IL 62711

Correct name and address, if different than shown

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION for the YEAR ENDED DECEMBER 31, 2011.

### SECTION I

INQUIRIES CONCERNING THIS ANNUAL REPORT SHOULD BE ADDRESSED TO:

NAME: Joseph O'Hara TITLE: CFO  
ADDRESS: 3130 Pleasant Run  
CITY: Springfield STATE: IL ZIP: 62711  
TELEPHONE: 217-698-2800 FAX: 217-698-3485 E-MAIL: regulatoryaffairs@zonetelecom.com

The company must notify the Commission, in writing, of any changes to the above information.

### SECTION II

TYPE OF PAYMENT - DO NOT SEND CASH IN THE MAIL

For Commission Use Only

Check  Money Order  AMEX  Visa  MasterCard  Discover

Credit Card Authorization #: \_\_\_\_\_

Credit Card Number:

Expiration Date  
Month/Year

CERTIFICATION FOR CREDIT CARD PAYMENT: I, the undersigned, under penalty for false statement, certify that the information is true, valid and correct, that I am authorized to execute on behalf of the applicant, and that I agree to pay the above total amount according to card issuer agreement.

Name (Printed) \_\_\_\_\_

Title \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

For Commission Use Only

Reception Number: \_\_\_\_\_ Reference: \_\_\_\_\_ Payment ID: \_\_\_\_\_ Receivable # \_\_\_\_\_

001-111-02-68-170-01: \_\_\_\_\_ 001-111-02-68-170-11: \_\_\_\_\_ 001-111-02-68-032-20: \_\_\_\_\_

Total Paid \_\_\_\_\_

Washington Unified Business Identifier (UBI) No.: 602054972  
(If you do not know your UBI No. please contact Business Licensing Service at 1-800-451-7985 or [BLS@dor.wa.gov](mailto:BLS@dor.wa.gov))

### Annual Report Certification

I certify that I, Joseph O'Hara, the responsible account officer for Zone Telecom LLC have examined the foregoing report; that, to the best of my knowledge, information and belief, all statements of fact contained in said report are true and said report is a correct statement of the business and affairs of the above-named respondent in respect to each and every matter set forth therein during the period from January 1, 2011, to December 31, 2011, inclusive.

Name (Printed) Joseph O'Hara Title CFO  
Signature [Handwritten Signature] Date 5/1/12

### Online Annual Report Certification

I acknowledge that the foregoing Annual Report has been submitted electronically; that, to the best of my knowledge, information and belief, all statements of fact contained in all attached schedules are true and said report is a correct statement of the business and affairs of the above-named respondent in respect to each and every matter set forth therein during the period from January 1, 2011, to December 31, 2011, inclusive. I agree that my name typed in lieu of my handwritten signature shall be sufficient to deem the report complete.

Authorized By:

Please Type Full Name Here

Authorized Date:

Please Type Full Date Here

SECTION III

1. Have you attached the following additional documents? The report will not be complete without the required documents:

- Income statement (**Required**):
- Balance sheet (**Required**):
- Additional information if required under WAC 480-120-385 (1) (c) (i), (ii), or (iii).
- Other documents (please describe):

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Washington State Data

2. Services

a. Does your company provide local exchange services in WA? Yes  No

b. What other services does your company provide in WA? Please list.

IXC

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3. Lines in service as of December 31, 2010

If you file Form 477 with the FCC for Washington operations, please indicate:

- a. The total number of voice grade equivalent lines: 0  
(provide the same number as included in the **FCC Form 477 Part II. A. 1.**)  
(If your company does not file Form 477 you still must report voice grade equivalent lines.)
- b. How many of the lines listed in 3.a. above, have access to E-911: \_\_\_\_\_

**SECTION IV -- OPTIONAL**

*NA*

Companies that have been granted minimal regulation of their bundled telecommunications services under RCW 80.36.332 may use this section to certify compliance if so required by Commission order.

**CERTIFICATION AS TO BUNDLED SERVICES**

I am an officer of or attorney for \_\_\_\_\_ (the "Company")  
and hereby certify (or declare) under penalty of perjury under the laws of the State of Washington  
that as of the date of execution of this document, the Company's packages or bundles of  
telecommunications services that are offered on a minimally regulated basis comply with  
RCW 80.36.332 and with UTC Order # \_\_\_\_\_ in Docket UT-\_\_\_\_\_.

**The foregoing is true and correct:**

Name (Printed) \_\_\_\_\_ Title \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_