

William J. Evans
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, UT 84111
801-536-6817 (tel)
801-536-6111 (fax)
BEvans@parsonsbehle.com

Counsel for SummitIG Utah, LLC

**BEFORE THE
PUBLIC SERVICE COMMISSION OF UTAH**

<p>In the Matter of the Application of</p> <p>SummitIG, Utah LLC</p> <p>for a Certificate of Public Convenience and Necessity to Provide Facilities-Based and Resold Local Exchange, Access, and Interexchange Telecommunications Services in the State of Utah</p>	<p>APPLICATION</p> <p>Docket No. _____</p>
--	--

APPLICATION OF SUMMITIG, LLC

SummitIG Utah, LLC ("SummitIG" or "Applicant"), by its undersigned officer and pursuant to Chapter 8b of Title 54 of the Utah Code; the Commission's Rules of Practice and Procedure, Utah Admin. Code R746-100 *et seq.*; and other applicable laws, hereby applies to the Utah Public Service Commission for a certificate of public convenience and necessity authorizing Applicant to operate as a provider of facilities-based and resold local exchange, access, and interexchange public telecommunications services in the State of Utah.

In support of its application, SummitIG provides the following information:

1. GENERAL INFORMATION:

Since 2012, SummitIG's affiliates have provided fiber and communications services to and from carrier neutral facilities and points-of-presence to support a variety of customers,

including enterprises, wireless and wireline carriers, governments and data centers. SummitIG is now planning to expand its operations both geographically and in the types of service it offers, initially by acquiring and constructing fiber network facilities in Utah. SummitIG will offer fiber connectivity solutions to a variety of customers in Utah as it now does in Virginia, and plans to eventually expand its service offerings to include facilities-based and resold local exchange, access and interexchange services. As advancing technology drives increasing demand for connectivity and transport, SummitIG's presence in the Utah market will bring to Utah customers much greater offerings, control and flexibility of communications at competitive prices.

Corporate Information:

- A. Applicant's legal name is SummitIG Utah, LLC and it will transact business as SummitIG in Utah. Applicant may be reached at its principal place of business:

SummitIG Utah, LLC
22375 Broderick Drive, Suite 165
Dulles, VA 20166
Telephone: 703-376-3694
Facsimile: 703-652-0743

- B. SummitIG Utah, LLC is a limited liability company organized under the laws of the State of Delaware on September 20, 2016. Copies of SummitIG's certificate of formation and its certificate of authority as a foreign company to transact business in the State of Utah are attached hereto as Exhibit A.

Contact Information:

Correspondence or communications pertaining to this Application should be directed to:

Sharon Thomas, Consultant to SummitIG Utah, LLC
Technologies Management, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-mail: sthomas@tminc.com

With a copy to:

William J. Evans
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, UT 84111
Telephone: 801-536-6817
Facsimile: 801-536-6111
E-mail: BEvans@parsonsbehle.com

Questions concerning the ongoing operations of Applicant following certification should be directed to:

Lee Grant, Vice President & General Counsel
SummitIG Utah, LLC
22375 Broderick Drive, Suite 165
Dulles, VA 20166
Telephone: 703-376-3694
Facsimile: 703-652-0743
E-mail: lgrant@summitig.com

Applicant's registered agent in the State of Utah is:

CT Corporation System
50 West Broadway
Salt Lake City, UT 84101

Customer Service Information:

SummitIG Utah, LLC
Attn: Operations
22375 Broderick Drive, Suite 165
Dulles, VA 20166

SummitIG's toll-free number for customer inquiries is (855) 776-6515.

2. R746-349-3(A)(2) Proof of bond in the amount of \$100,000

This bond is intended to provide security for customer deposits or other liabilities to telecommunications customers of the Applicant. SummitIG does not plan to collect customer deposits or offer any prepaid services in Utah; therefore, SummitIG requests a waiver of this bond requirement.

3. R746-349-3(A)(3) Construction and Acquisition of Facilities

SummitIG intends to acquire, lease and construct conduit, handholes, fiber optic cable and supporting equipment and facilities in the State of Utah in order to provide services to the public. SummitIG has signed an agreement with a third party to acquire communication facilities in the locations depicted in Confidential Exhibit B. The information provided in Confidential Exhibit B is proprietary and has been attached in a sealed envelope marked “**Confidential – Subject to Public Service Commission of Utah Rule R746-100-16.**” Because it contains sensitive information regarding SummitIG’s business operations, SummitIG respectfully requests that this information be treated confidentially and not be released to any member of the public absent SummitIG’s prior written permission.

4. R746-349-3(A)(4) Services to be offered

SummitIG seeks authority to offer interexchange, transit, tandem switching, private line telecommunications, and all services that a facilities-based service provider is authorized to provide. SummitIG intends initially to offer only fiber services to a variety of business subscribers statewide. To the extent SummitIG provides basic local exchange service in the future, it will initially do so in the areas served by Qwest and does not plan to provide such service in the area of any small or rural local exchange carriers having fewer than 5,000 access lines.¹

5. R746-349-3(A)(5) Access to standard services

As noted above, SummitIG does not initially intend to offer standard local exchange services, including access toll calling, operator services, directory listings and emergency services. Instead, it will initially offer fiber services to business subscribers who may utilize the fiber for various communications needs. If in the future the Applicant offers a standard local exchange service offering, it would provide access to ordinary intraLATA and interLATA message toll calling, operator services, directory assistance, directory listings, and emergency services through interconnection and contractual arrangements with the underlying ILEC.

¹ Applicant does not seek to terminate any exemption held by a rural telephone company pursuant to 47 U.S.C. § 251(f).

6. R746-349-3(A)(6) Implementation schedule

SummitIG intends to initiate its operations in Utah upon closing the transaction described in paragraph 3, and upon receipt of authority from the Commission.

7 R746-349-3(A)(7) Professional experience and education of managerial personnel and personnel responsible for Utah operations

Applicant's current management team from its headquarters in Dulles, Virginia will handle responsibility for Utah operations. Descriptions of the extensive telecommunications and managerial experience of SummitIG's key personnel are attached hereto as Exhibit C.

8. R746-349-3(A)(8) Organization Chart

Please see Exhibit C for managerial team responsible for Utah operations.

9. R746-349-3(A)(9) Chart of accounts

SummitIG's chart of accounts including account numbers, names, and brief descriptions is attached hereto as Confidential Exhibit D. The information provided in Confidential Exhibit D is proprietary and has been attached in a sealed envelope marked "**Confidential – Subject to Public Service Commission of Utah Rule R746-100-16.**" Because it contains sensitive information regarding SummitIG's business operations, SummitIG respectfully requests that this information be treated confidentially and not be released to any member of the public absent SummitIG's prior written permission.

10. R746-349-3(A)(10) Financial Statements

The Company is providing, in Confidential Exhibit E, its audited 2015 and unaudited year-to-date 2016 financial statements of its parent company, Summit Infrastructure Group, Inc. in support of SummitIG's financial ability to provide the proposed services in Utah. The information provided in Confidential Exhibit E is proprietary and has been attached in a sealed envelope marked "**Confidential – Subject to Public Service Commission of Utah Rule R746-100-16.**" Because it contains sensitive information regarding SummitIG's business operations, SummitIG respectfully requests that this information be treated

confidentially and not be released to any member of the public absent SummitIG's prior written permission.

11. R746-349-3(A)(11) Additional Financial Statements

(a) R746-349-3(A)(11)(a) Positive net worth

See Confidential Exhibit E.

(b) R746-349-3(A)(11)(b) Income and cash flow statements

The Applicant's parent company has sufficient cash flow to meet cash needs for a five-year projection of SummitIG's expected operations, See Confidential Exhibit F for the five-year projection. The information provided in Confidential Exhibit F is proprietary and has been attached in a sealed envelope marked "**Confidential – Subject to Public Service Commission of Utah Rule R746-100-16.**" Because it contains sensitive information regarding SummitIG's business operations, SummitIG respectfully requests that this information be treated confidentially and not be released to any member of the public absent SummitIG's prior written permission.

(c) R746-349-3(A)(11)(c) Proof of bond

Not applicable. Applicant requests a waiver as the company does not solicit customer deposits or offer any prepaid telecommunications services.

12. R746-349-3(A)(12) Five-year Projection

(a) R746-349-3(A)(12)(a) Proforma income and cash flow statements

See Confidential Exhibit F for financial projections.

(b) R746-349-3(A)(12)(b) Technical Description

The Applicant does not intend initially to install technology in connection with its installation of conduit, handholes, fiber and related facilities. While SummitIG may install other facilities in Utah, SummitIG has not yet determined the specific facilities to be deployed in the future.

(c) **R746-349-3(A)(12)(c) Detailed Maps of Facilities Locations**

SummitIG intends initially to provide telecommunications services at the locations identified in Confidential Exhibit B.

13. R746-349-3(13) Implementation schedule

SummitIG does not currently have an implementation schedule for when telecommunications services will begin. SummitIG proposes to begin providing telecommunications service in Utah shortly after the transaction described in paragraph 3 has closed, and after the Commission has issued an order granting the Certificate pursuant to this Application.

14. R746-349-3(A)(14) Technical and managerial abilities

SummitIG's officers and personnel have the necessary managerial and technical resources and qualifications necessary to execute its business plan and to provide its proposed telecommunications services. SummitIG's management team has extensive experience in the telecommunications industry. Biographies of SummitIG's key personnel are attached hereto as Exhibit C.

Company personnel are well qualified to direct the delivery and billing of the proposed services.

The Applicant itself intends to operate only in the State of Utah and, therefore, has not received authority to conduct business in other states. However, its affiliates, Summit Infrastructure Group, LLC and SummitIG, LLC hold certificates to provide local exchange and interexchange telecommunications services in the Commonwealth of Virginia (Case Nos. PUC-012-00066, issued February 14, 2013 and PUC-2014-00006, issued March 21, 2014.)

(a) R746-349-3(A)(14)(a) Proof of Certification

Please see Confidential Exhibit C and Section 14 above with respect to SummitIG's affiliates' operations over the last two years or more.

(b) R746-349-3(A)(14)(b) Experience

Please see Confidential Exhibit C and Section 14 above with respect to SummitIG's affiliates' operations over the last two years or more.

15. R746-349-3(A)(15) Public interest

Approval of SummitIG's application will serve the public interest by creating greater competition in the marketplace. SummitIG's deployment of telecommunications infrastructure in Utah will expand access to high quality, cost effective telecommunications services. In addition to driving prices closer to costs, thereby producing more just and reasonable rates, SummitIG's entry into the Utah market will promote efficiency in the delivery of services and in the development of new services. These benefits work to maximize the public interest by providing continuing incentives for carriers to reduce costs while, simultaneously, promoting the availability of potentially desirable services from SummitIG and other providers of telecommunications services. The public convenience and necessity, therefore, will be served by the issuance of a Certificate of Public Convenience and Necessity to Applicant authorizing it to provide the services described in this application.

16. R746-349-3(A)(16) Proof of Authority to Conduct Business in Utah

Please see Exhibit A.

17. R746-349-3(A)(17) Unauthorized switching, solicitation of new customers, and prevention of unauthorized switching

While the Applicant does not initially propose to offer any services that could potentially result in the unauthorized switching of a customer's local or long distance carrier, to the extent that it offers such services in the future, SummitIG will comply with the State of Utah law and the Federal Communications Commission's ("FCC's") regulations, as

applicable, regarding how interexchange carriers may change a consumer's Primary Interchange Carrier ("PIC") or primary local exchange provider.

(a) R746-349-3(A)(17)(a) Sanctions

SummitIG has never had sanctions imposed against it for unauthorized switching.

(b) R746-349-3(A)(17)(b)

Not applicable.

(c) R746-349-3(A)(17)(c)

Not applicable.

18. R746-349-3(A)(18) Applicant's written policies

Applicant utilizes company sales representatives to market its services to carriers and enterprise business customers. See response to Item 17 above.

WHEREFORE, SummitIG Utah, LLC, respectfully requests that the Utah Public Service Commission issue a Certificate of Public Convenience and Necessity authorizing SummitIG Utah, LLC to provide facilities-based and resold local exchange, access, and interexchange telecommunications services within the State of Utah.

Dated this ___ day of October, 2016:

Respectfully submitted,
PARSONS BEHLE & LATIMER

/s/ William J. Evans

William J. Evans
Counsel for SummitIG Utah, LLC

LIST OF EXHIBITS

EXHIBIT A	Certificate of Formation and Certificate of Good Standing in Utah
EXHIBIT B	CONFIDENTIAL – Location of Acquired Facilities
EXHIBIT C	Managerial and Technical Qualifications
EXHIBIT D	CONFIDENTIAL - Chart of Accounts
EXHIBIT E	CONFIDENTIAL - Financial Statements
EXHIBIT F	CONFIDENTIAL - Five-Year Projection of Expected Operations
VERIFICATION	