PUBLIC UTILITY COMMISSION OF OREGON
201 HIGH STREET SE SUITE 100
PO BOX 1088
SALEM, OREGON 97308-1088
(971) 375-5103

Print

APPLICATION FOR TRANSFER OF CERTIFICATE OF AUTHORITY TO PROVIDE TELECOMMUNICATIONS SERVICE IN OREGON

INSTRUCTIONS: Complete every applicable section of this application. Attach additional documents and/or sheets to complete responses (if needed). You will be notified when the Commission receives your application, and again when it has been processed. After accepting this application, the Commission will publish notice per ORS 759.020(2).

Desired Effective Date: December 4, 2026

To guarantee processing by the effective date, the Commission must receive an application at least 60 days prior to the desired effective date unless Commission Staff and Applicant have agreed to an earlier effective date. The Commission allows filing and notice prior to effective date of transaction. The Commission will issue an order on the desired effective date unless Applicant files a notice of extension or withdraws the application.

SECTION 1 – Transferee/Surviving Entity Information

1. EXACT LEGAL NAME OF SURVIVING ENTITY OR TRANSFEREE:

LTS Telecommunications Services (USA) Inc.

Applicant's Assumed Business Name(s), if any (e.g., dba, aka) (*must be registered with the Corporation Division):*

N/A

Applicant's Type of Legal Entity (e.g., corporation, limited partnership):

Corporation

Business Address:

10180 Telesis Court, Suite 240, San Diego, California, 92121

Phone: (858) 527-6400 Email: Gale.williams@ledcor.com

2. NAME AND ADDRESS OF PERSON TO CONTACT FOR MORE INFORMATION REGARDING THIS APPLICATION:

Victor Noriega

Troutman Pepper Locke LLP, 600 Peachtree Street, NE, Suite 3000, Atlanta, Georgia 30308

Phone: (404) 885-3037 Email: Victor.Noriega@troutman.com

3. NAME AND ADDRESS OF PERSON TO CONTACT FOR REGULATORY INFORMATION
***(Commission will send requests for information to this person)*:**

Gale Williams, Director, Asset Management

500 Meijer Way, Suite 200, Florence, Kentucky, 41042

Phone: (859) 286-8114 Email: Gale.williams@ledcor.com

4. AFFILIATED INTERESTS:

As of the date of the transfer, will you be, or are you now, or have you ever been affiliated with any provider of telecommunications service that serves Oregon? If so, who? When? Describe affiliation. Affiliated interest is defined in OAR 860-032-0001.

See response attached hereto.

5. PREVIOUS CERTIFICATES OF AUTHORITY:

List each certificate of authority previously granted by the Oregon PUC to Applicant and to each affiliated entity, under a legal name, an assumed business name, or any other name. Include all certificates whether or not canceled. For each certificate provide the name of entity, docket number, and order number.

Name of Entity	Docket Number	Order Number
LTS Telecom Services (East) LLC	CP 1667	22-279
Comspan Communications Inc d/b/a COMSPANUSA	CP 788	20-446

SECTION 2 – Transferor/Transferring Entity Information

By completing this information the Transferor acknowledges that it will no longer have authority and cannot provide the telecommunications services that are transferred.

1. EXACT LEGAL NAME OF TRANSFERRING OR MERGING ENTITY (TRANSFEROR):

LTS Telecom Services (East) LLC

Applicant's Assumed Business Name(s), if any (e.g., dba, aka) (*must be registered with the Corporation Division):*

N/A

Applicant's Type of Legal Entity (e.g., corporation, limited partnership):

Limited Liability Company

Business Address:

10180 Telesis Court, Suite 240, San Diego, California, 92121

Phone: (858) 527-6400 Email: Gale.williams@ledcor.com

2. NAME AND ADDRESS OF PERSON TO CONTACT FOR MORE INFORMATION REGARDING THIS APPLICATION:

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Gale Williams, Director, Asset Management

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Phone: (859) 286-8114 Email: Gale.williams@ledcor.com

4. CERTIFICATES OF AUTHORITY TO BE TRANSFERRED:

a. List each certificate of authority previously granted by the Oregon PUC to Transferor, under its legal name, an assumed business name, or any other name. Include all certificates whether or not canceled. For each certificate provide the name of entity, docket number, and order number.

Name of Entity	Docket Number	Order Number
LTS Telecom Services (East) LLC	CP 1667	22-279

b. Do you request that ALL authority to provide telecommunications service be transferred? ■ Yes ☐ No

c. If response to 4.b. is No, describe what authority is to be transferred and what authority is to be retained by the Transferor.

N/A

Note: The transferring entity (Transferor) will no longer be authorized to provide the telecommunications services that are transferred.

SECTION 3 – Nature of Transaction between Transferee and Transferor (describe in detail)

Transferor and Transferee are both part of the Ledcor Group of Companies, an industry leader in infrastructure construction, operation, and maintenance. Both entities are under common ownership and share the same management team, operational resources, and technical personnel. Transferor is transferring all authority to provide telecommunications services in Oregon to Transferee for administrative and accounting purposes. Following the transfer, Transferee will continue to offer the same telecommunications services, utilizing the same qualified management and technical staff.

Please use additional sheets if necessary to fully answer any item.

SECTION 4 – Conditions of a Certificate of Authority

As a condition of a certificate of authority, certificate holder must comply with all applicable Commission rules and state law, as well as conditions listed in the certificate. The surviving entity (Transferee) is responsible for the annual PUC fee and all other fees incurred by the transferring entity (Transferor) as of the date the Commission approves the transfer.

For your convenience, following is a summary of some conditions from OAR 860 Divisions 32 and 33. Additional conditions may be specified in the certificate.

Certificate holder must:

- Provide only the telecommunications service authorized in the certificate.
- Respond in a timely manner to Commission inquiries.
- Notify the Commission of changes to the certificate holder's name, address, email, or telephone number.
- Maintain its books and records according to the applicable rules of the Commission, and keep its books and records open to inspection by the Commission to the extent necessary to verify information required of the certificate holder.
- Meet service standards set forth in applicable Commission rules, including OAR 860-032-0012.
- Submit required reports in a timely manner, and timely pay all Commission taxes, fees, assessments, access charges, and subsidies pursuant to Oregon law or Commission rules, orders, tariffs, or price lists.
- Pay an annual fee to the Commission pursuant to the Commission's rules. This fee will be based on the certificate holder's annual gross retail intrastate revenues and will be no less than $100 per calendar year. Certificate holder must collect the fee by charging an equitable amount to each retail customer and describe the amount of the apportioned charge on each retail customer's bill, pursuant to the Commission's rules.
- Pay a quarterly amount to the Oregon Universal Service Fund based on a Commission-approved surcharge percentage assessed on all retail telecommunications services sold in Oregon pursuant to ORS 759.425(4).
- Ensure that the Residential Service Protection Fund surcharge is remitted monthly to the Commission. This surcharge is assessed against each paying retail subscriber at a rate that is set annually by the Commission.

☑ **Applicant understands that all services provided by Applicant must comply with all applicable Commission rules and state law, and with conditions of the certificate (check box at left).**

Signature of Person Authorized to Represent Transferee/Surviving Entity Typewritten Name BRENT PRICE	Title VICE PRESIDENT Date OCT. 2/26
Signature of Person Authorized to Represent Transferor/Transferring Entity Typewritten Name BRENT PRICE	Title VICE PRESIDENT Date OCT. 2/26
By signing this document I certify that I am a legal representative of this entity and that by transferring the authority to provide telecommunications to the above noted surviving entity, the transferring entity no longer has authority to provide telecommunications services that are transferred.	

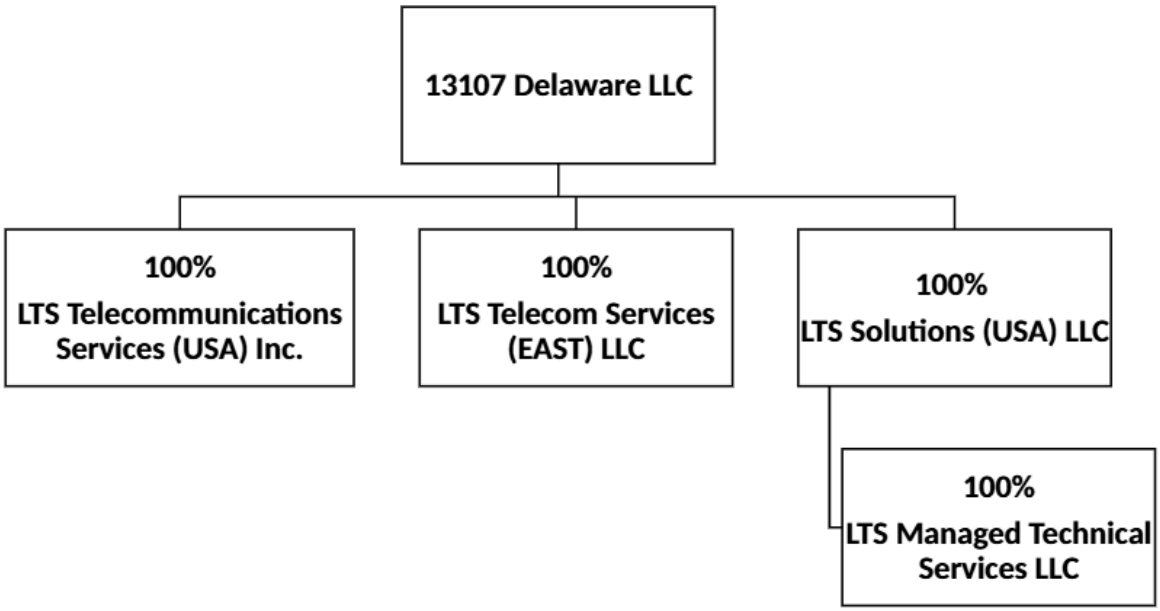
Print

LESLIE LISTER
NOTARY PUBLIC
STATE AT LARGE
KENTUCKY
COMMISSION # KYNP117378
MY COMMISSION EXPIRES AUGUST 11, 2030

Section 1, Question 4, Affiliated Interests

Comspan Communications Inc. was previously owned by the ultimate parent company of Transferor and Transferee but was sold in 2019.

Transferor and Transferee are affiliates and share the same parent company. Please see the Organizational Chart included below.



Transferee's Authorization to Transact Business in Oregon

[Attached]

APPLICATION FOR AUTHORITY

Corporation Division
sos.oregon.gov/business

E-FILED
Sep 08, 2026
OREGON SECRETARY OF STATE

REGISTRY NUMBER

262481790

TYPE

FOREIGN BUSINESS CORPORATION

1. ENTITY NAME

LTS TELECOMMUNICATIONS SERVICES (USA) INC.

2. MAILING ADDRESS

10180 TELESIS CT STE 240
SAN DIEGO CA 92121 USA

3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY ST NE STE 310
SALEM OR 97301 USA

4. PRESIDENT

IAIN MORRIS

1500 1067 WEST CORDOVA STREET
VANCOUVER BC V6C 1C7 CAN

5. SECRETARY

THOMAS LOFARO

10180 TELESIS CT STE 240
SAN DIEGO CA 92121 USA

6. DATE OF INCORPORATION

11-07-2017

7. DURATION

PERPETUAL

8. JURISDICTION

DELAWARE

9. PRIMARY PHYSICAL LOCATION

10180 TELESIS CT STE 240
SAN DIEGO CA 92121 USA

I declare, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any officers, directors, employees or agents of the corporation on behalf of which the person signs. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

ELECTRONIC SIGNATURE

NAME

THOMAS LOFARO

TITLE

CHIEF LEGAL OFFICER

DATE

09-04-2026