

**BEFORE THE SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

In the Matter of the Application of ANPI, LLC)
for a Certificate of Authority to provide Resold)
Competitive Local Exchange Telecommunications) Docket No.: TC
Services and Voice over Internet Protocol)
Telecommunications Services on a wholesale-only)
basis within the State of South Dakota)

APPLICATION

COMES NOW ANPI, LLC, (hereinafter “Applicant” or “ANPI”), by the undersigned and files this Application requesting authority to engage in providing competitive local exchange and Voice over Internet Protocol (hereinafter “VoIP”) telecommunications services on a wholesale-only basis throughout the territories and exchanges of CenturyLink in the State of South Dakota under the name ANPI, LLC. Under Order Granting Certificate of Authority TC97-048, ANPI, LLC, formerly Associated Network Partners, Inc. and later converted to ANPI, LLC, was granted authorization by this Commission to provide Interexchange telecommunications services in South Dakota. With this application, ANPI now wishes to expand its authority to include competitive resold local exchange telecommunications services and internet protocol-enhanced telecommunications services on a wholesale-only basis.

In support of its Application, Applicant states as follows:

1. The name, address, telephone number, facsimile number, web page URL, and E-mail address for the Applicant are as follows:

Principal Place of Business: ANPI, LLC
3243 Meadowbrook, Springfield, IL 62711
Phone: (217) 698-2860;
Facsimile: (217) 698-0100
Toll Free: 1 (877) 366-2674
Web Page URL: <http://www.anpi.com>
Email: regulatoryaffairs@anpisolutions.com

2. Applicant is a foreign for-profit limited liability company duly organized on April 15, 2011, existing under the laws of the State of Delaware. A copy of the Applicant's Certificate of Formation and their Certificate of Correction is attached as **Exhibit A**. Applicant is currently in good standing with all regulatory agencies in all jurisdictions where it is registered and certified.

3. ANPI, LLC will provide their wholesale local exchange services under their actual name; ANPI, LLC.

4. Applicant will have no offices in the State of South Dakota, but the name and address of its Registered Agent within South Dakota is: Corporation Service Company, 503 South Pierre Street, Pierre, SD, 57501.

5. The Applicant applied for and received a Limited Liability Company Certificate of Authority from the South Dakota's Office of the Secretary of State, a copy of which is attached as **Exhibit B**.

6. The Applicant currently provides interexchange, local exchange, and/or VoIP telecommunications services in several jurisdictions. Applicants operations and/or authorities are outlined in the attached **Exhibit C**.

7. ANPI, LLC ("Applicant") has one sole member, its parent company: ANZ Communications LLC ("ANZ"). ANZ is not a public utility. Applicant has two affiliates which

are utilities; ANPI Business, LLC, a retail provider of Local Exchange, Interexchange, and VoIP telecommunications services, and Common Point LLC, a wholesale provider of tandem access switching for which Applicant is the managing member. The parent and the Applicant's affiliate's offices are at 3243 Meadowbrook, Springfield, IL, 62711. An organizational chart is attached as **Exhibit D**.

8. ANPI is a wholesale carrier's carrier that seeks to supply independent telephone companies, cooperatives, competitive local exchange carriers, wireless carriers, and Internet service providers with resold local exchange and Internet Protocol-enhanced telecommunications services throughout all territories and exchanges of CenturyLink in the State of South Dakota. ANPI will not provide any telecommunications services directly to end users. Applicant will rely on the facilities of the underlying carrier(s) to provide their resold telecommunications services. Attached as **Exhibit E** is a listing of the exchanges where Applicant proposes to begin its initial local service offerings which is intended to mirror all CenturyLink exchanges.

9. See attached as **Exhibit F** a service area map of areas for proposed service. Applicant is seeking to provide service in Century Link's areas only.

10. ANPI, LLC cumulatively possesses over fifty years of technical and managerial expertise and experience necessary to provide the services it proposes. To further demonstrate abilities, the biographies of key management personnel are attached as **Exhibit G**.

Applicant has people and policies in place to handle customer complaints and also has a state of the art 24x7x365 NOC in Frisco, TX. Applicant supplies a toll free number for customer service inquiries during normal business hours and another toll free number listed on their website which routes directly to the NOC for after-hours emergencies (1-888-NOC-24x7).

11. As a wholesale provider of telecommunications services, the Applicant will not serve any end users. Typical telecommunications services like 911, enhanced 911, operator services, interexchange services, telecommunications relay services, and directory assistance are specific to serving end user customers. Underlying access to these services will either be accessed by using the facilities of the underlying carrier or by way of Internet Protocol, depending on what type of technology is in place for each specific caller.

12. The Applicant has sufficient financial resources to provide the proposed telecommunications services within South Dakota as demonstrated in **Exhibit H**. The applicant is submitting Exhibit H as confidential and under seal for the use of the Commission only for the following reasons; a) ANPI, LLC is not a publicly traded company and therefore does not file financial statements with the SEC; b) The statements contain sensitive financial information, which ANPI, 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; c) Public disclosure of the information would cause undue harm to ANPI, LLC and would prove detrimental to ANPI, LLC's competitive position in the marketplace. The confidential information is being provided for the sole use of the Commission in exercising its respective

governmental functions of examining the Application. There is no legitimate purpose to be served in disclosing this confidential material to any person other than the appropriate reviewing staffs of the Commission.

13. Initially, the Applicant intends to interconnect with Century Link. Applicant will seek applicable Interconnection Agreements upon completion of certification. No requests for interconnection have been made at this time.

14. The Applicant will market its services to other telecommunications providers by traditional forms of advertising, by way of existing interexchange customers, and by way of professional contacts. Applicant does not and will not engage in multilevel marketing practices. No brochure of services is available at this time.

15. Applicant is not seeking to provide local exchange service in the service areas of rural telephone companies. Should rural operations ever become part of the Applicant's South Dakota business plan, Applicant will file an additional application with the Public Utilities Commission seeking expansion of their current authority to include those rural areas.

16. The jurisdictions where the Applicant is registered or certified to provide telecommunications service was provided in detail in **Exhibit C** to this application. Applicant has never been denied registration or certification in any state and is in good standing with the appropriate regulatory agency in the states where it is registered or certified.

17. Customers Complaint Escalation Path is as follows:

1st Level:

Customer Service Representative
3243 Meadowbrook, Springfield, IL 62711
Phone: 877-366-2674
Fax: 217-698-0100
customerservice@anpi.com

2nd level:

Heidi May Young, VP of Customer Support/Business Relations
3243 Meadowbrook, Springfield, IL 62711
Phone: 217-698-2862
Fax: 217-698-0100
hyoung@anpi.com

3rd Level:

Joseph O'Hara, Chief Financial Officer
3243 Meadowbrook, Springfield, IL 62711
Phone: 217-698-2860
Fax: 217-698-0100
regulatoryaffairs@anpi.com

18. The Applicant does not and will not use third parties for billing. A sample invoice is attached as **Exhibit I**. Any changes in rates, terms or conditions will be provided to customers with no less than thirty (30) days' notice in the form of billing inserts and notifications. Customers engaging the Applicant for service will be provided a current set of rates, terms and conditions upon signed agreement for service.

19. Applicant will use fair and reasonable industry standards to maintain its current policies. ANPI, LLC is able to properly perform the proposed telecommunications services and to conform to the terms, conditions, and Rules of the South Dakota Public Utilities Commission. ANPI, LLC has never participated in any unauthorized switching or slamming practices, nor will they ever do so. The Applicant has no pending actions or unsatisfied judgments or decisions against it from any state or federal agency or court which involves customer service rates, which action, judgment or decision has occurred within three (3) years of the date of this Application.

20. The Applicant has not been the subject of any complaints regarding unauthorized switching of a customer's telecommunications provider or the act of charging customers for services that have not been ordered. As such, there have been no enforcement actions against the Applicant for these types of issues.

21. Applicant will make available to any person information concerning the Applicant's current rates, terms, and conditions for all of its telecommunications services by dialing toll-free-number (877) 366-2674 or by email at customerservice@anpi.com. A description of services offered is located at website <http://www.anpi.com/carrier/>.

22. Applicant will notify a customer of any materially adverse change to any rate, term, or condition of telecommunications service to the customer through either a message in the bill, or a bill insert. The notification will be made at least thirty days in advance of the change.

23. As the Applicant is only seeking authority in the areas and exchanges of CenturyLink, no rural exemption is deemed necessary, per 49-31-73. As a wholesale only provider, no retail-related laws would be applicable. Applicant seeks no formal waivers at this time.

24. The Applicant's federal tax identification number is 37-1348433 and the Applicant's South Dakota sales tax number is 1012-5978-WT.

25. Questions regarding this application should be directed to Matt Dean, Regulatory Agent for ANPI, LLC; Telecom Professionals, Inc., PO Box 720128, Oklahoma City, OK 73172-0128; Phone: (405) 755-8177; Facsimile: (405) 755-8377, and email: mdean@telecompliance.net. Regulatory matters should be directed to Judith A. Riley, Regulatory Consultant for ANPI, LLC; Telecom Professionals, Inc., PO Box 720128; Oklahoma City, OK 73172-0128; Phone: (405) 755-8177; Facsimile: (405) 755-8377, and email: jriley@telecompliance.net. In-house regulatory matters should be directed to Joseph O'Hara, Chief Financial Officer, 3243 Meadowbrook, Springfield, IL 62711; Phone: (217) 698-2860; Facsimile: (217) 698-0100, and email regulatoryaffairs@anpi.com.

Applicant feels the granting of this Application will further the public interest by expanding the availability of competitive telecommunications services in the State of South Dakota. The public will benefit directly through the presence of Applicant in this market as it will increase the incentives for other telecommunications providers to operate more efficiently, offer more innovative services, reduce their prices, and improve their quality of services.

WHEREFORE, Applicant, ANPI, LLC prays that the Public Utilities Commission enter an order granting it a Certificate of Authority in the State of South Dakota for competitive resold local exchange and internet protocol-enhanced telecommunications services on a wholesale-only basis.

Applicant certifies that the representations in this Application and attached exhibits are true, correct, and complete, based on Applicant's knowledge and belief, and made in good faith.

DATED this 13th day of December, 2013.

Respectfully submitted,

/s/ Judith A. Riley

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