

February 18, 2016

**VIA E-FILE**

Office of the Secretary  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO 65102-0360

**Re: Campus Communications Group, Inc. – Application for Certificate of Service Authority to Provide Basic Local Exchange and Non-Switched Local Exchange Telecommunications Services in the State of Missouri**

Ladies and Gentlemen:

Campus Communications Group, Inc., by its undersigned counsel, hereby submits its Application for Certificate of Service Authority to Provide Basic Local Exchange and Non-Switched Local Exchange Telecommunications Services in the State of Missouri.

Should you have any questions regarding the application, please contact the undersigned.

Respectfully submitted,



Linda G. McReynolds

*Counsel for Campus Communications Group, Inc.*

Enclosures

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of )  
**Campus Communications Group, Inc.** )  
for Certificate of Service Authority to Provide )  
Basic Local Exchange and Non-Switched ) Case No. \_\_\_\_\_  
Local )  
Exchange Telecommunications Services )  
in the State of Missouri. )  
)

**APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY TO PROVIDE BASIC LOCAL  
EXCHANGE AND NON-SWITCHED LOCAL EXCHANGE  
TELECOMMUNICATIONS SERVICES IN THE STATE OF MISSOURI**

Comes now Campus Communications Group, Inc. ("CCG," or the "Applicant"), pursuant to Sections 392.361, 392.420, 392.430, and 392.440 RSMo, and 4 CSR 240-2.060, and in support of its Application for a certificate of service authority as a basic local exchange and non-switched local exchange telecommunications services carrier to provide telecommunications services in the State of Missouri and to classify said services as competitive, states to the Missouri Public Service Commission (the "Commission") the following:

1. CCG is a corporation duly organized and existing under and by virtue of the laws of Delaware. Its headquarters and principal place of business are located at 206 North Randolph Street, Suite 200, Champaign, Illinois 61820, and its telephone number is (217) 531-9060. A copy of the Applicant's Certificate of Good Standing from the Delaware Secretary of State is attached as **Exhibit A**. A copy of its Certificate of Registration to do business in Missouri is attached as **Exhibit B**.
2. All inquiries, correspondence, communications, pleadings, notices, orders, and decisions relating to this case should be addressed to:

Linda G. McReynolds, Esq.  
Marashlian & Donahue, PLLC  
1420 Spring Hill Road, Suite 401  
McLean, Virginia 22102  
Tel: (703) 714-1318  
Fax: (703) 563-6222

Email: [lqm@commlawgroup.com](mailto:lqm@commlawgroup.com)

*With a copy to:*

Keenan P. Adamchak, Esq.  
Marashlian & Donahue, PLLC  
1420 Spring Hill Road, Suite 401  
McLean, VA 22102  
Tel: (703) 714-1323  
Fax: (703) 563-6222  
Email: [kpa@commlawgroup.com](mailto:kpa@commlawgroup.com)

3. CCG provides telecommunications services. Specifically, CCG intends to provide Missouri Telecommunications Services throughout the State of Missouri. A complete explanation and summary of CCG's telecommunications service offerings is provided in **Exhibit C** attached hereto.
4. CCG seeks Commission certification to provide telecommunications service in Missouri. Specifically, CCG seeks authority as a basic local exchange and non-switched local exchange telecommunications services carrier to offer and provide telecommunications services pursuant to Sections 392.361, 392.420, 392.430, and 392.440 RSMo.
5. By this Application, CCG furthermore requests certificate of service authority to provide competitive basic local exchange telecommunications services to customers throughout all exchanges of all incumbent local exchange companies ("ILECs") in the State of Missouri. Applicant's proposed basic local exchange service offerings will follow the respective exchange boundaries of each ILEC, and shall be no smaller than an exchange as required by Section 392.455(3) RSMo.
6. Notwithstanding the provisions of 392.500 RSMo, as a condition of certification and competitive classification, Applicant agrees that, unless otherwise ordered by the Commission, its originating and terminating switched access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each ILEC within whose service area the Applicant provides service.
7. CCG will offer basic local telecommunications services as a separate and distinct service in accordance with applicable law. Applicant will give consideration to equitable access for all

Missourians, regardless of where they might reside or their income, to affordable telecommunications services in CCG's proposed service areas in accordance with applicable law.

8. The Commission may grant CCG a certificate of service authority as a basic local exchange and non-switched local exchange telecommunications services carrier to provide telecommunications services if the Commission finds such authority to be in the public interest. Approval of this Application will serve the public interest and with the legislative goals set forth in the Federal Telecommunications Act of 1996, and Chapter 392 RSMo. Granting this Application will not adversely impact, but rather will contribute to the availability of telecommunications services in Missouri. Applicant's infrastructure will help expand fiber optic network footprints by adding coverage and capacity. Applicant will provide customers with complete high-quality fiber optic infrastructure solutions, which in turn will provide customers with higher quality internet and Voice over Internet Protocol ("VoIP") service. The result will be a stimulus to economic growth and development, particularly among the carrier's carrier customers that form an integral role in providing quality internet and VoIP services throughout the state to the benefit of consumers. In addition, granting the requested certificate will not unreasonably prejudice or disadvantage any class of customers or service providers. Accordingly, Applicant anticipates that its proposed service will serve the public interest and need by increasing customer choice of innovative, diversified, and reliable infrastructure design, construction, and operation.
9. CCG seeks classification of itself and its services as competitive. Applicant submits that the services it will provide are subject to sufficient competition to justify competitive classification, and promotes the public interest. *See* Section 392.361 RSMo. Expedient grant of this Application will further competition, and allow CCG to compete with other companies consistent with: (1) the Commission's policies; (2) the legislative goals set forth in the Federal Telecommunications Act of 1996; and (3) Chapter 392 RSMo. Applicant submits that the public interest will be served by Commission approval of this Application because Applicant's proposed services will create and enhance competition, and expand customer service options. Approval will also expand the

availability of innovative, high quality, and reliable telecommunications services within the State of Missouri. Accordingly, all of CCG's proposed services should be designated as competitive, and CCG should be designated as a competitive telecommunications company.

10. Applicant is willing to comply with all applicable Commission rules, except those which are specifically waived by the Commission. Consistent with the Commission's treatment of similarly-situated telecommunications carriers, CCG requests that the Commission grant Staff's recommended waivers of statutes and regulations.
11. CCG does not have any pending action or final unsatisfied judgment or decisions against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of application.
12. CCG does not have any overdue annual reports or assessment fees due to the Commission.
13. CCG possess the technical and managerial resources and abilities necessary to provide the services it proposes as required by Section 392.455(1) RSMo. Attached to this Application as **Exhibit D** is the affidavit of a corporate officer attesting to the technical and managerial resources and abilities of the Applicant.
14. CCG possesses the necessary financial resources and abilities to provide the proposed services as required by Section 392.455(1) RSMo, and has the necessary capital to conduct its proposed operations in Missouri. Attached to this Application as **Exhibit D** is the affidavit of a corporate officer attesting to the financial resources and abilities of the Applicant.
15. CCG requests to be exempt from tariff filing requirements pursuant to Section 391.461 RSMo. Applicant will provide all information regarding retail prices for its services via its website: <http://www.ccgfiber.com>.
16. Applicant states that it will undertake all necessary measures to ensure its contracts with other companies and carriers do not contain provisions preventing delivery of traffic to any telephone exchange area, and that such measures include but are not limited to:

- a. Prevention of call blocking and/or call gapping based on the cost of traffic termination.
- b. Preventing the alteration or stripping of Calling Party Number Identification.
- c. Ensuring sufficient network capacity exists to process all traffic according to industry accepted practices.

WHEREFORE, applicant Campus Communications Group, Inc. respectfully requests that the Commission grant it a certificate of service authority as a as a basic local exchange and non-switched local exchange telecommunications services carrier to provide telecommunications services as herein requested, grant competitive status to Applicant, grant Applicant's request for waiver of the aforesaid statutes and regulations set forth in this Application, and grant such other relief as the Commission deems appropriate.

Respectfully submitted,

***/s/ Linda G. McReynolds***

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Linda G. McReynolds  
Marashlian & Donahue, PLLC  
1420 Spring Hill Road, Suite 401  
McLean, Virginia 22102  
Tel: (703) 714-1318  
Fax: (703) 563-6222  
Email: [lqm@commlawgroup.com](mailto:lqm@commlawgroup.com)

Missouri Bar ID#: 49489

ATTORNEY FOR APPLICANT  
Campus Communications Group, Inc.

Dated: February 18, 2016

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Staff's Counsel's officer at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov), and the Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov), this 18 day of February, 2016.

***/s/ Linda G. McReynolds***

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Linda G. McReynolds

**EXHIBIT A**

**Certificate of Good Standing**

# Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "CAMPUS COMMUNICATIONS GROUP, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE EIGHTH DAY OF JANUARY, A.D. 2016.



3413851 8300

SR# 20151455837

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

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Authentication: 201639270

Date: 01-08-16

**EXHIBIT B**

**Certificate of Registration to do Business in Missouri**

# STATE OF MISSOURI



Jason Kander  
Secretary of State

## CERTIFICATE OF AUTHORITY

WHEREAS,

*CAMPUS COMMUNICATIONS GROUP, INC.*  
*F001324306*

has complied with the Missouri General and Business Corporation Law which governs Foreign Corporations; by filing in the office of the Secretary of the State of Missouri authenticated evidence of its incorporation and good standing under the Laws of the State of Delaware.

NOW, THEREFORE, I, JASON KANDER, Secretary of State of the State of Missouri, do hereby certify that said corporation is from this date duly authorized to transact business in this State, and is entitled to all rights and privileges granted to Foreign Corporations under the General and Business Corporation Law.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 8th day of February, 2016.

  
Secretary of State



## **EXHIBIT C**

### **Telecommunications Service Offerings**

Applicant intends to provide fiber optic dedicated networks, which may be utilized for transmission of both voice and data communications. In addition, Applicant provides fiber optic Internet access services. In providing service, CCG will lease or construct, as well as operate or manage, various types of conduit, ducts, cables, and other equipment within the public right-of-ways. CCG intends to install its customer premises telephone line facilities, consisting of fiber optic cable and related equipment, primarily in existing conduits and other existing building and infrastructure at each service location.

**EXHIBIT D**

**Corporate Officer Affidavit**

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of )  
**Campus Communications Group, Inc.** )  
for Certificate of Service Authority to Provide )  
Basic Local Exchange, Non-Switched Local )  
Exchange, and Interexchange )  
Telecommunications Services in the State of )  
Missouri. )

Case No. \_\_\_\_\_

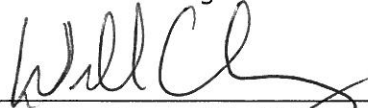
**AFFIDAVIT**

STATE OF ILLINOIS )  
 )  
COUNTY OF CHAMPAIGN

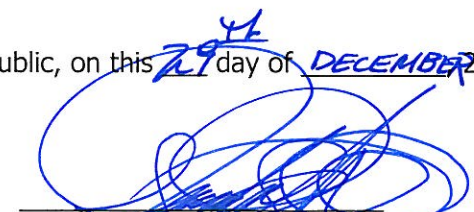
I, William Clavey, of lawful age and being first duly sworn, do hereby depose and state that:

1. I am the Vice President of Finance for Campus Communications Group, Inc. ("CCG"), the Applicant in the above-referenced matter, and am authorized to make this Affidavit on its behalf.
2. CCG possesses sufficient technical, financial, and managerial resources and abilities to provide basic local exchange, non-switched local exchange, and interexchange telecommunications services in the State of Missouri.
3. CCG has not defaulted on any of its financial obligations within the last three years.

Further affiant sayeth not.

  
\_\_\_\_\_  
William Clavey, VP of Finance

Subscribed and sworn before me, a Notary Public, on this 29<sup>th</sup> day of DECEMBER 2015.

  
\_\_\_\_\_  
Notary Public

[SEAL]

