

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of TWC IP Enabled Services, LLC
for a certificate of public convenience and
necessity to provide non-facilities-based Fixed
Interconnected VoIP services.

Application



FILED

07/16/25

04:59 PM

A2507008

**APPLICATION OF TWC IP ENABLED SERVICES, LLC FOR
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
PURSUANT TO PUBLIC UTILITIES CODE SECTION 1001**

[PUBLIC VERSION]

Zeb C. Zankel
Jenner & Block LLP
525 Market Street, 29th Floor
San Francisco, CA 94105
Tel: (628) 267-6812
Email: ZZankel@jenner.com

July 16, 2025

Counsel for TWC IP Enabled Services, LLC

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

CPCN Application Form Pursuant to Public Utilities Code Section 1001

1. APPLICANT INFORMATION

Applicant Name: TWC IP Enabled Services, LLC

Business Address: 12405 Powerscourt Drive, St. Louis, Missouri 63131

Telephone No.: (314) 543-2438

E-mail Address: DL-CPUC-TWCIS@charter.com

1.a. Principal Place of Business: (if different from address above)

Not Applicable

1.b. List all fictitious business names under which Applicant has done business in the last five years:

Not Applicable

1.c. Applicant is (check one only)

- | | |
|--|---|
| <input type="radio"/> Corporation (Inc) | <input type="radio"/> General Partnership |
| <input type="radio"/> Limited Partnership (LP) | <input type="radio"/> Sole Proprietor |
| <input checked="" type="radio"/> Limited Liability Company (LLC) | <input type="radio"/> Trust |
| <input type="radio"/> Other, specify: | |

Attach **Appendix A** with the following: 1) a copy of the entity's organizing documents; (2) evidence of the Applicant's qualification to transact business in California; and (3) a copy of its Certificate of Good Standing Status certified by the Secretary of State of California.

1.d. Applicant has a foreign ownership interest

☒ NO ☐ YES, Foreign entity interest:

2. APPLICANT REGISTERED AGENT FOR SERVICE OF PROCESS

Agent Name: Corporate Service Company

Address: 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833-3305

Telephone No.: (866) 403-5272

3. APPLICANT LEGAL DOMICILE (check one only)

- | | |
|----------------------------------|---|
| <input type="radio"/> California | <input checked="" type="radio"/> Other, specify: Delaware |
|----------------------------------|---|

4. APPLICANT PROPOSED SCHEDULE OF PROCEEDING (check all that apply)

Ratesetting	DATE(s)	Other Proposed Schedule	DATE(s)
<input checked="" type="checkbox"/> Prehearing Conference	09/02/2025	<input type="checkbox"/>	
<input checked="" type="checkbox"/> Scoping Memo	10/02/2025	<input type="checkbox"/>	
<input type="checkbox"/> Testimony (Optional)		<input type="checkbox"/>	
<input type="checkbox"/> Briefing (Optional)		<input type="checkbox"/>	
<input type="checkbox"/> Evidentiary Hearing (Optional) (Appendix B)		<input type="checkbox"/>	
<input checked="" type="checkbox"/> Proposed Decision	11/03/2025	<input type="checkbox"/>	

If Evidentiary Hearing is selected, attach **Appendix B** describing the issues which require hearing and length of hearing needed.

5. WHAT ISSUES ARE THERE TO BE RESOLVED IN THIS APPLICATION?

(check all that apply)

- ☒ Whether this application meets all state and California Public Utilities Commission (Commission) requirements for a certificate of public convenience and necessity (CPCN), including but not limited to financial, technical, and California Environmental Quality Act (CEQA) requirements.
- ☐ Whether the proposed construction is eligible for the Commission's 21 day expedited process for CEQA review.
- ☐ Consideration of a safety issue. (Provide a description of the issue below.)

- ☐ Consideration of an Environmental and Social Justice (ESJ) issue. (Provide a description explaining the ESJ issue for resolution. Otherwise, Applicant attests that there is no ESJ issue for consideration in this Application.)
- ☐ Other (Provide a description of the issue(s) below.)

6. APPLICANT WILL OPERATE AS (check all that apply)		
<input type="checkbox"/> Competitive Local Exchange Service Provider 6.a. Proposed Facilities <input type="radio"/> Full Facilities-Based <input checked="" type="radio"/> Limited Facilities-Based <input type="checkbox"/> Switchless Reseller / Non-facilities-based 6.d. Service Territories <input type="checkbox"/> Within ALL the Service Territories of Uniform Regulatory Framework Incumbent Local Exchange Carriers <input type="checkbox"/> Within ALL the Service Territories of the Small Incumbent Local Exchange Carriers <input type="checkbox"/> In specific portions of the State only (Appendix C)	<input type="checkbox"/> Interexchange (Intra / Inter-LATA) Service Provider 6.b. Proposed Facilities <input type="radio"/> Full Facilities-Based <input type="radio"/> Limited Facilities-Based <input type="checkbox"/> Switchless Reseller / Non-facilities-based 6.e. Service Territories <input type="radio"/> Throughout the State of California. <input checked="" type="radio"/> In specific portions of the State only (Appendix C)	<input checked="" type="checkbox"/> Fixed Interconnected Voice over Internet Protocol (VoIP) Service Provider 6.c. Proposed Facilities <input type="radio"/> Full Facilities-Based <input type="radio"/> Limited Facilities-Based <input checked="" type="checkbox"/> Non-facilities-based 6.f. Service Territories <input type="checkbox"/> Within the Service Territories of Uniform Regulatory Framework Incumbent Local Exchange Carriers <input type="checkbox"/> Within the Service Territories of Small Incumbent Local Exchange Carriers <input checked="" type="checkbox"/> In specific portions of the State only (Appendix C)
<p>Applicant that <i>only</i> selected non-facilities-based for Proposed Facilities (Section 6.a, 6.b. and 6.c.) is not required to respond to Section 11 and 12 of the CPCN Application form. If no facilities are proposed, Applicant may be eligible to use the 1013 registration process pursuant to Pub. Util. Code Section 1013.</p> <p>Attach Appendix C to include a list of the specific portion(s) or geographical location(s) of the State, and /or ILEC territory(ies); and a copy of the map(s).</p> <p>Applicant seeking to operate in any Small Incumbent Local Exchange Carriers territories must meet the requirements contained in Appendix A of D.20-08-011.</p>		

7. DATE APPLICANT EXPECTS TO BEGIN OR HAS BEGUN OFFERING SERVICE(S) IN CALIFORNIA (If already operating in California, attach **Appendix D**)

Upon grant of authority.

8. APPLICANT WILL PROVIDE THE FOLLOWING SERVICES IN CALIFORNIA
(check all that apply)

- ☐ Provide voice services (traditional wireline and/or Fixed Interconnected VoIP) directly to customers
- ☐ Build facilities which will transmit or facilitate voice services (traditional wireline and/or Interconnected VoIP) through third parties.
- ☒ Other (Describe below other services applicant offers, whether or not they are within Commission's jurisdiction.)

Provide wholesale voice service (Fixed Interconnected VoIP) to affiliate Spectrum Advanced Services, LLC, which will directly serve voice customers in California.

9. SWORN AFFIDAVIT

☐ TRUE ☒ NOT TRUE (**Appendix E**)

Neither Applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant: (a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of Sections 17000 et seq., 17200 et seq., or 17500 et seq. of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; and/or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

Attach **Appendix E** if Applicant's response to this section is anything other than an unqualified "True." Applicant must declare exceptions by attaching documentation and describing any such bankruptcies, findings, judgments, convictions, referrals, denials, suspensions, revocations, limitations, settlements, voluntary payments or any other type of monetary forfeitures.

9.a. List of all affiliated entities (Attach **Appendix F**)

10. APPLICANT HAS THE REQUIRED EXPERTISE TO OPERATE AS A SERVICE PROVIDER OF THE TYPE INDICATED IN SECTION 6 OF THIS FORM.

☒ TRUE ☐ NOT TRUE

10.a. Attach **Appendix G** with List of the names, titles, and street addresses of all officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed.

10.b. Attach **Appendix H** with Resumes for each personnel identified in Section 10.a. List all employment for each officer, director, partner, agent, or owner (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed.

10.c. Applicant Attestation to the Statement Below ☐ TRUE ☒ NOT TRUE (**Appendix I**)

To the best of Applicant's knowledge, neither Applicant, any affiliate, officer, director, partner, nor owner of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

Attach **Appendix I** if Applicant's response to this section is anything other than an unqualified "True." Applicant must declare exceptions by attaching documentation and describing all such investigations, whether pending, settled voluntarily or resolved in another manner.

11. CONSTRUCTION OR EXTENSION OF FACILITIES FOR LIMITED AND FULL FACILITIES-BASED APPLICANTS ONLY.

☐ YES. Attach **Appendix J** that includes all responses to **11.a.** thru **11.j.**

11.a. Description of proposed construction activities, documentation attached.

11.b. List of competing entities

11.c. Map showing proposed construction

11.d. Statement of franchises and health and safety permits

11.e. Facts showing public convenience and necessity requiring the proposed construction.

11.f. Statement showing cost of construction.

11.g. Statement showing financial ability to render service.

11.h. Statement showing proposed rates.

11.i. Annual Report Statement.

11.j. Estimated number of customers in the first and fifth years in the future

12. APPLICANT'S PROPOSED FULL FACILITIES ARE LIKELY ELIGIBLE FOR A CATEGORICAL EXEMPTION FROM CEQA AND APPLICANT REQUESTS TO UTILIZE THE ENERGY DIVISION'S 21-DAY EXPEDITED CEQA REVIEW PROCESS.

☒ YES. Attach **Appendix K** with list of categorical exemptions and briefly explain the applicability of each exemption to the proposed construction.

☐ NO. Attach **Appendix K** with Preliminary Environmental Assessment.

13. FINANCIAL REQUIREMENT

☒ TRUE ☐ NOT TRUE

Applicant has a minimum of (a) \$25,000 in the case of a switchless reseller/ non-facilities-based OR (b) \$100,000 in the case of a Facilities-Based (Full and /or Limited), in each case reasonably liquid and available to meet the firm's first year expenses, including an additional \$25,000 for deposits which may be required by local exchange carriers or interexchange carriers; OR (c) has profitable interstate operations to generate the required cash flow.

Attach **Appendix L** with financial instrument that demonstrates the Applicant meets financial requirements.

14. APPLICANT IS ELIGIBLE AND SEEKS AN EXEMPTION FROM TARIFFING REQUIREMENTS

☒ TRUE ☐ NOT TRUE (Attach **Appendix M**)

15. OTHER LICENSE(S) HELD WITH THE COMMISSION, EITHER CURRENT AND/OR PRIOR

☐ NONE

☒ CURRENT AND/OR PRIOR, specify:

Affiliates of Applicant are licensed under the following utility numbers: Bright House Networks Information Services (California), LLC (U6955C), Charter Fiberlink CA-CCO, LLC (U6878C), Time Warner Cable Information Services (California), LLC (U6874C), Spectrum Mobile, LLC (U4522C), and Spectrum Advanced Services, LLC (U1158C).

I hereby declare under penalty of perjury under the laws of the State of California that the forgoing information, and all attachments, are true, correct, and complete to the best of my knowledge and belief after due inquiry, and that I am authorized to make this application on behalf of the Applicant named above.

Signed 

Name Michael R. Moore

Title GVP Law - Telephone Regulatory

Dated 7-16-25

Address 12405 Powerscourt Drive
St. Louis, MO 63131

Telephone (314) 394-9007

Email Address Michael.Moore@charter.com

ATTACHMENT A

ATTACHMENT TO SECTION 1001 APPLICATION FORM

SWORN AFFIDAVIT

Name of Applicant/Company: **TWC IP Enabled Services, LLC** ("Applicant")

My name is **Jamal H. Haughton**. I am **Executive Vice President, General Counsel and Corporate Secretary** of **TWC IP Enabled Services, LLC**. My personal knowledge of the facts stated herein has been derived from my employment with **Charter Communications, Inc., manager of TWC IP Enabled Services, LLC**.

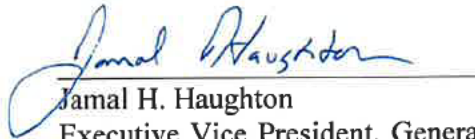
I affirm that **TWC IP Enabled Services, LLC**:

- Agrees to comply with all federal and state statutes, rules, and regulations, Commission requirements as a Telephone Corporation, and state contractual rules and regulations, if granted the request as stated in this application; and
- Certifies that all responses to the attached 1001 Application for CPCN are true and correct.

I affirm that, **except as set forth in the attached Explanation of Exceptions**, neither Applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, nor anyone acting in a management capacity of Applicant: (a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been to my knowledge the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of sections 17000 et seq., 17200 et seq., or 17500 et seq. of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; and/or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

To the best of my knowledge, and also **except as set forth in the attached Explanation of Exceptions**, neither Applicant, any affiliate, officer, director, partner, nor owner of more than 10% of applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this Application, including the attachment to this sworn affidavit, are true and correct.



Jamal H. Haughton
Executive Vice President, General Counsel and
Corporate Secretary
TWC IP Enabled Services, LLC
6/20/25

EXPLANATION OF EXCEPTIONS

**[REDACTED – PROTECTED FROM PUBLIC DISCLOSURE PURSUANT TO
FEDERAL AND CALIFORNIA LAW AND REGULATION]**

Schedule of Appendices*

Appendix A	Corporate Documentation
Appendix C	Service Territory
Appendix E	See Attachment A of the Application which contains the Sworn Affidavit and Explanation of Exceptions
Appendix F	Affiliated Entities
Appendix G	Officers and Owners
Appendix H	Biographical Information
Appendix I	See Attachment A of the Application which contains the Sworn Affidavit and Explanation of Exceptions
Appendix L	Financial Instrument
Attachment A	Sworn Affidavit and Explanation of Exceptions

* *Note:* In Attachment A and throughout the Appendices, TWC IP Enabled Services, LLC uses the same appendix lettering identified in the Sample CPCN Application Form set forth in Decision 24-11-003.

Appendix A

Corporate Documentation

Attached are: (i) the Certificate of Formation for TWC IP Enabled Services, LLC issued by the Delaware Secretary of State on April 1, 2023; (ii) the Certificate of Registration of TWC IP Enabled Services, LLC acknowledged by the California Secretary of State on September 13, 2023; and (iii) the Certificate of Good Standing for TWC IP Enabled Services, LLC, dated May 22, 2025, issued by the California Secretary of State.

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "TWC IP ENABLED SERVICES, LLC", FILED IN THIS OFFICE ON THE THIRTIETH DAY OF MARCH, A.D. 2023, AT 4:45 O`CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF FORMATION IS THE FIRST DAY OF APRIL, A.D. 2023.



Jeffrey W. Bullock, Secretary of State

7382193 8100
SR# 20231231300

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 203068211
Date: 04-04-23

**STATE OF DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE OF FORMATION**

FIRST. The name of the limited liability company is

TWC IP Enabled Services, LLC

SECOND. The purpose of the company is to engage in any lawful act or activity for which a limited liability company may be organized under the Delaware Limited Liability Company Act.

THIRD. The duration of the company shall be perpetual.

FOURTH: The address of its registered office in the State of Delaware is 251 Little Falls Drive, Wilmington, Delaware 19808. The name of its Registered Agent at such address is Corporation Service Company.

FIFTH: The effective date of the Certificate of Formation is April 1, 2023.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation this 30th day of March, 2023.

BY: _____



Jennifer A. Smith
Authorized Person



202359012985



STATE OF CALIFORNIA
Office of the Secretary of State
REGISTRATION
OUT-OF-STATE LIMITED LIABILITY COMPANY
California Secretary of State
1500 11th Street
Sacramento, California 95814
(916) 653-3516

For Office Use Only

-FILED-

File No.: 202359012985

Date Filed: 9/13/2023

B2111-4232 09/13/2023 3:34 PM Received by California Secretary of State

Limited Liability Company Name	
Limited Liability Company Name	TWC IP Enabled Services, LLC
Jurisdiction	
Limited Liability Company is Formed in	DELAWARE
Authority Statement	
This LLC currently has powers and privileges to conduct business in the state, foreign country or other jurisdiction entered above.	
Street Address of Principal Office of LLC	
Principal Address	12405 POWERSCOURT DRIVE SAINT LOUIS, MO 63131
Mailing Address of LLC	
Mailing Address	12405 POWERSCOURT DRIVE SAINT LOUIS, MO 63131
Attention	Legal department
Street Address of California Office of LLC	
Street Address of California Office	None
Agent for Service of Process	
<input checked="" type="checkbox"/> I certify the selected California Registered Corporate Agent (1505) has agreed to serve as the Agent for Service of Process for this entity.	
California Registered Corporate Agent (1505)	CORPORATION SERVICE COMPANY WHICH WILL DO BUSINESS IN CALIFORNIA AS CSC - LAWYERS INCORPORATING SERV Registered Corporate 1505 Agent
Consent to Service of Process	
<p>The Secretary of State is appointed as the agent of the foreign (out-of-state) limited liability company for service of process if the agent has resigned and has not been replaced or if the agent cannot be found or served with the exercise of reasonable diligence.</p> <p>Consent to service of process extends to service of process directed to the foreign (out-of-state) limited liability company's agent in this state for a search warrant issued pursuant to California Penal Code section 1524.2, or for any other validly issued and properly served search warrant, for records or documents that are in the possession of the foreign (out-of-state) limited liability company and are located inside or outside of this state. This shall apply to a foreign (out-of-state) limited liability company that is a party or a nonparty to the matter for which the search warrant is sought. For purposes of this consent "properly served" means delivered by hand, or in a manner reasonably allowing for proof of delivery if delivered by United States mail, overnight delivery service, facsimile, or any other means specified by the foreign (out-of-state) limited liability company, including email or submission via an Internet Web portal, the foreign (out-of-state) limited liability company has designated for the purpose of service of process.</p>	

Electronic Signature

☒ By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized to sign on behalf of the out-of-state LLC.

Jennifer A Smith

Signature

09/13/2023

Date



California Secretary of State

Business Programs Division
1500 11th Street, Sacramento, CA 95814

TWC IP Enabled Services, LLC
12405 POWERSCOURT DRIVE
SAINT LOUIS, MO 63131

Initial Business Filing Approved

September 14, 2023

Entity Name: TWC IP Enabled Services, LLC
Entity Type: Limited Liability Company - Out of State
Entity No.: 202359012985
Document Type: Initial Filing
Document No.: 202359012985
File Date: 09/13/2023

Congratulations! The above referenced document has been approved and filed with the California Secretary of State. To access free copies of filed documents, go to bizfileOnline.sos.ca.gov and enter the entity name or entity number in the Search module.

What's Next?

Be sure to review the Welcome Letter for key information and contacts you may need.

Corporations and limited liability companies must file a Statement of Information within 90 days of the initial filing and annually or every other year, thereafter. For additional resources, view Starting A Business Checklist for key steps you may need to take when launching a business in California.

For further assistance, contact us at (916) 657-5448 or visit bizfileOnline.sos.ca.gov.



Thank you for using [bizfile California](https://bizfileOnline.sos.ca.gov), the California Secretary of State's business portal for online filings, searches, business records, and additional resources.



Secretary of State

Certificate of Qualification / Registration

I, SHIRLEY N. WEBER, PH.D., California Secretary of State, hereby certify:

Entity Name: TWC IP Enabled Services, LLC
Entity No.: 202359012985
Registration Date: 09/13/2023
Filing Type: Limited Liability Company - Out of State
Formed In: DELAWARE

The above referenced entity complied with the requirements of California law in effect on the Registration Date for the purpose of qualifying to transact intrastate business in the State of California, and that as of the Registration Date, said entity became and now is duly registered, qualified and authorized to transact intrastate business in the State of California, subject however, to any licensing requirements otherwise imposed by the laws of this State and that the entity shall transact all intrastate business within California under the Entity Name as set forth above.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of September 13, 2023.

A handwritten signature in black ink, appearing to read "S. N. Weber".

SHIRLEY N. WEBER, PH.D.
Secretary of State

Certificate No.: 144796131

To verify the issuance of this Certificate, use the Certificate No. above with the Secretary of State Certification Verification Search available at bizfileOnline.sos.ca.gov.

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "TWC IP ENABLED SERVICES, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWELFTH DAY OF SEPTEMBER, A.D. 2023.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "TWC IP ENABLED SERVICES, LLC" WAS FORMED ON THE FIRST DAY OF APRIL, A.D. 2023.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.



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.

7382193 8300

SR# 20233476130

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 204148207

Date: 09-12-23

B2111-4234 09/13/2023 3:34 PM Received by California Secretary of State



Secretary of State

Certificate of Status

I, SHIRLEY N. WEBER, PH.D., California Secretary of State, hereby certify:

Entity Name: TWC IP Enabled Services, LLC
Entity No.: 202359012985
Registration Date: 09/13/2023
Entity Type: Limited Liability Company - Out of State
Formed In: DELAWARE
Status: Active

The above referenced entity is active on the Secretary of State's records and is qualified to transact intrastate business in California.

This certificate relates to the status of the entity on the Secretary of State's records as of the date of this certificate and does not reflect documents that are pending review or other events that may impact status.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of May 22, 2025.

A handwritten signature in black ink, appearing to read "S. N. Weber".

SHIRLEY N. WEBER, PH.D.
Secretary of State

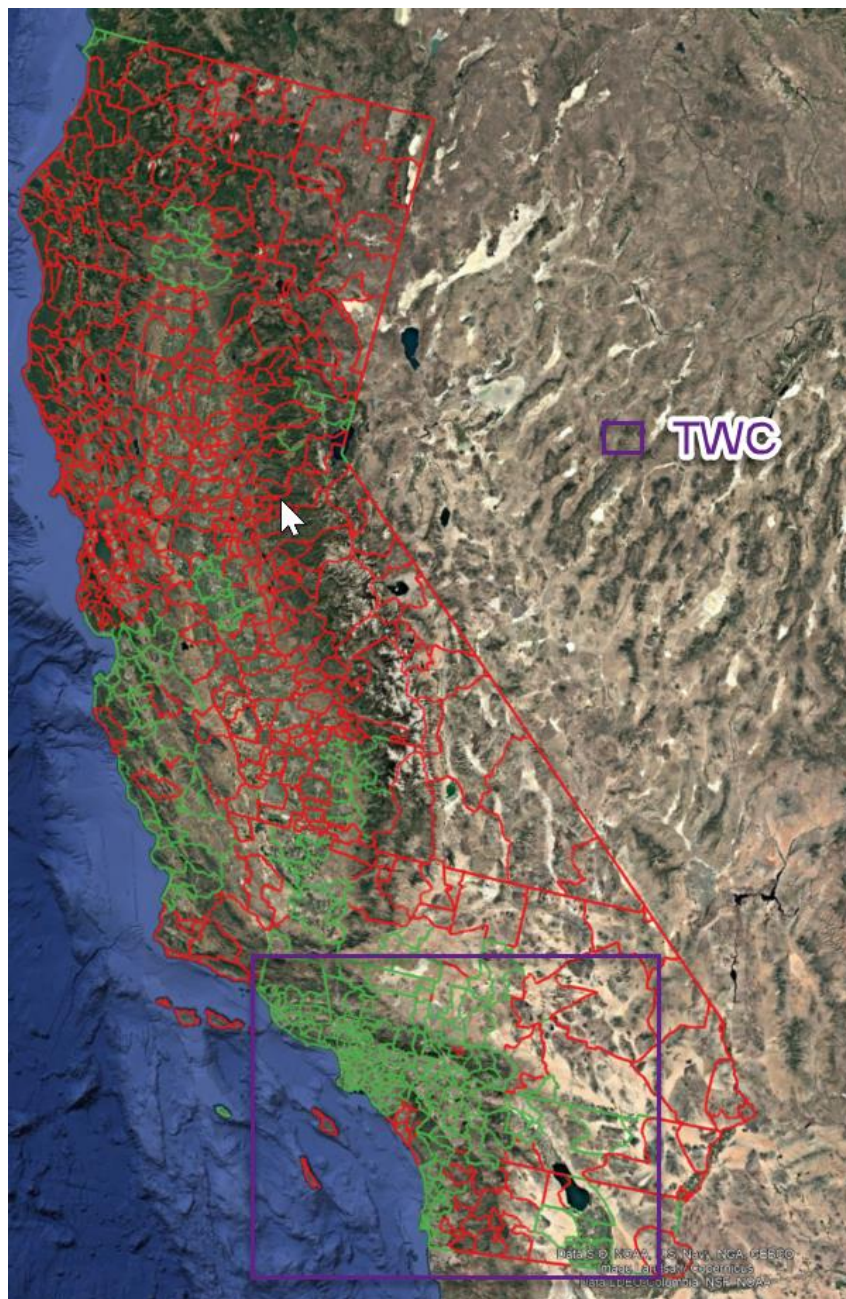
Certificate No.: 330383130

To verify the issuance of this Certificate, use the Certificate No. above with the Secretary of State Certification Verification Search available at bizfileOnline.sos.ca.gov.

Appendix C

Service Territory

TWC IP Enabled Services, LLC will provide services in all geographic locations within the State of California served by its affiliate, Time Warner Cable Information Services (California), LLC (U6874C), which was granted authority in Decision D.04-03-032. Below is a copy of its service area map. TWC IP Enabled Services, LLC does not seek authority to operate in the service territories of the Small Incumbent Local Exchange Carriers.



Appendix E

See Attachment A of the Application which contains the Sworn Affidavit and Explanation of Exceptions.

Appendix F

Affiliated Entities

The following is a list of subsidiaries of Charter Communications, Inc., the ultimate parent company to TWC IP Enabled Services, LLC. Each of these listed entities is under common control with TWC IP Enabled Services, LLC. Charter Communications, Inc. is a reporting company for purposes of the Securities Exchange Act of 1934, as amended.

BHN IP Enabled Services, LLC
Bresnan Broadband Holdings, LLC
Bresnan Broadband of Colorado, LLC
Bresnan Broadband of Montana, LLC
Bresnan Broadband of Wyoming, LLC
Bresnan Digital Services, LLC
Bright House Networks Information Services (Alabama), LLC
Bright House Networks Information Services (California), LLC (U6955C)
Bright House Networks Information Services (Florida), LLC
Bright House Networks Information Services (Indiana), LLC
Bright House Networks Information Services (Michigan), LLC
CC Fiberlink, LLC
CC VI Fiberlink, LLC
CC VII Fiberlink, LLC
CCH Holding Company, LLC
CCH I Holdings, LLC
CCH II, LLC
CCHC, LLC
CCI Green, LLC
CCO EIP Financing, LLC
CCO Fiberlink, LLC
CCO Holdings Capital Corp.
CCO Holdings, LLC
CCO NR Holdings, LLC
Charter Communications ASC, LLC
Charter Communications Holding Company, LLC
Charter Communications Holdings, LLC
Charter Communications, LLC
Charter Communications Operating Capital Corp.
Charter Communications Operating, LLC
Charter Communications SSC, LLC
Charter Communications VI HoldCo, LLC
Charter Communications VI, L.L.C.
Charter Distribution, LLC
Charter Fiberlink - Alabama, LLC
Charter Fiberlink - Georgia, LLC

Charter Fiberlink - Illinois, LLC
Charter Fiberlink - Maryland II, LLC
Charter Fiberlink - Michigan, LLC
Charter Fiberlink - Missouri, LLC
Charter Fiberlink - Nebraska, LLC
Charter Fiberlink - Tennessee, LLC
Charter Fiberlink CA-CCO, LLC (U6878C)
Charter Fiberlink CC VIII, LLC
Charter Fiberlink CCO, LLC
Charter Fiberlink CT-CCO, LLC
Charter Fiberlink LA-CCO, LLC
Charter Fiberlink MA-CCO, LLC
Charter Fiberlink MS-CCVI, LLC
Charter Fiberlink NC-CCO, LLC
Charter Fiberlink NH-CCO, LLC
Charter Fiberlink NV-CC VII, LLC
Charter Fiberlink NY-CCO, LLC
Charter Fiberlink OR-CCVII, LLC
Charter Fiberlink SC-CCO, LLC
Charter Fiberlink TX-CCO, LLC
Charter Fiberlink VA-CCO, LLC
Charter Fiberlink VT-CCO, LLC
Charter Fiberlink WA-CCVII, LLC
Charter IP Enabled Services, LLC
Charter Leasing Holding Company, LLC
Charter Procurement Leasing, LLC
DukeNet Communications, LLC
Fusion Merger Sub 1, LLC
Fusion Merger Sub 2, Inc.
Innovar Media LLC
Insight Blocker LLC
SCI Aviation, Inc.
Spectrum Advanced Services, LLC (U1158C)
Spectrum Captive Holdings, LLC
Spectrum Communications Indemnity Inc.
Spectrum Fiberlink Florida, LLC
Spectrum Gulf Coast, LLC
Spectrum Management Holding Company, LLC
Spectrum Mid-America, LLC
Spectrum Mobile Equipment, LLC
Spectrum Mobile, LLC (U4522C)
Spectrum New Jersey, LLC
Spectrum New York Metro, LLC
Spectrum NLP, LLC
Spectrum Northeast, LLC
Spectrum Oceanic, LLC

Spectrum Originals Development, LLC
Spectrum Originals, LLC
Spectrum Pacific West, LLC
Spectrum Reach, LLC
Spectrum RSN, LLC
Spectrum SN, LLC
Spectrum Southeast, LLC
Spectrum SportsNet, LLC
Spectrum Stamford, LLC
Spectrum Sunshine State, LLC
Spectrum TV Essentials, LLC
Spectrum Wireless Holdings, LLC
Time Warner Cable Business LLC
Time Warner Cable Enterprises LLC
Time Warner Cable Information Services (Alabama), LLC
Time Warner Cable Information Services (Arizona), LLC
Time Warner Cable Information Services (California), LLC (U6874C)
Time Warner Cable Information Services (Colorado), LLC
Time Warner Cable Information Services (Hawaii), LLC
Time Warner Cable Information Services (Idaho), LLC
Time Warner Cable Information Services (Illinois), LLC
Time Warner Cable Information Services (Indiana), LLC
Time Warner Cable Information Services (Kansas), LLC
Time Warner Cable Information Services (Kentucky), LLC
Time Warner Cable Information Services (Maine), LLC
Time Warner Cable Information Services (Massachusetts), LLC
Time Warner Cable Information Services (Michigan), LLC
Time Warner Cable Information Services (Missouri), LLC
Time Warner Cable Information Services (Nebraska), LLC
Time Warner Cable Information Services (New Hampshire), LLC
Time Warner Cable Information Services (New Jersey), LLC
Time Warner Cable Information Services (New Mexico), LLC
Time Warner Cable Information Services (New York), LLC
Time Warner Cable Information Services (North Carolina), LLC
Time Warner Cable Information Services (Ohio), LLC
Time Warner Cable Information Services (Pennsylvania), LLC
Time Warner Cable Information Services (South Carolina), LLC
Time Warner Cable Information Services (Tennessee), LLC
Time Warner Cable Information Services (Texas), LLC
Time Warner Cable Information Services (Virginia), LLC
Time Warner Cable Information Services (Washington), LLC
Time Warner Cable Information Services (West Virginia), LLC
Time Warner Cable Information Services (Wisconsin), LLC
Time Warner Cable, LLC
TWC Administration LLC
TWC Communications, LLC

TWC Employee Disaster Relief Fund
TWC SEE Holdco LLC
TWCIS Holdco LLC

Appendix G

Officers and Owners

The names and titles of the officers of TWC IP Enabled Services, LLC are listed below. TWC IP Enabled Services, LLC has no directors and was not formed as a partnership, and has no partners.

The primary corporate address for the officers of TWC IP Enabled Services, LLC is:

400 Washington Blvd.
Stamford, CT 06902

Christopher L. Winfrey	President and CEO
Jessica M. Fischer	Chief Financial Officer
Richard J. DiGeronimo	President, Product and Technology
Jamal H. Haughton	Executive Vice President, General Counsel and Corporate Secretary
Kevin D. Howard	Executive Vice President, Chief Accounting Officer and Controller
Magesh Srinivasan	Executive Vice President, Network Operations
Jeffrey B. Murphy	Senior Vice President, Corporate Finance and Development
Thomas E. Proost	Senior Vice President, Deputy General Counsel and Assistant Corporate Secretary
Meredith H. Garwood	Group Vice President, Strategic Tax
Alan D. Jones	Group Vice President, Tax Operations
Michael R. Moore	Group Vice President, Law – Telephone Regulatory
Scott A. Schwartz	Group Vice President, Corporate Finance and Treasurer
Jennifer A. Smith	Vice President, Associate General Counsel and Assistant Corporate Secretary

The following entities hold at least ten (10) percent of the equity and/or voting power of Charter Communications, Inc., including its subsidiary TWC IP Enabled Services, LLC:

Liberty Broadband Corporation
12300 Liberty Boulevard
Englewood, CO 80112

Advance/Newhouse Partnership
One World Trade Center
New York, NY 10007

Appendix H

Biographical Information

Biographical information for TWC IP Enabled Services, LLC's primary officers and Executive Vice Presidents is provided below:

Christopher Winfrey, President and Chief Executive Officer

Christopher Winfrey was named President and Chief Executive Officer of Charter Communications in December 2022 and appointed to the Board of Directors in November 2023. Charter is a leading broadband connectivity company that, under the Spectrum brand, provides Internet, Mobile, TV and Voice services to over 32 million customers in 41 states, with more than 101,000 employees.

Mr. Winfrey has played a significant role in Charter's growth and transformation over the past decade. He most recently served as Chief Operating Officer since 2021, where he oversaw all cable operations, including marketing, sales, field operations and customer operations, as well as Spectrum Enterprise. As COO, Mr. Winfrey led the company's rural expansion initiative, including its \$5 billion commitment as part of the Rural Digital Opportunity Fund (RDOF) to make gigabit broadband connectivity available to a million currently unserved locations.

Mr. Winfrey joined Charter as Chief Financial Officer in 2010 responsible for Charter's accounting, financial planning and analysis, procurement, real estate, tax and treasury functions, as well as mergers and acquisitions, capital structure activities and investor relations. As CFO, he spearheaded Charter's transformative M&A activity, played an integral role in the Time Warner Cable and Bright House Networks integrations and managed Charter's financial activities through a period of significant growth. Charter added oversight of its fiber-based Spectrum Enterprise business to his CFO responsibilities in 2019, and operational leadership of the residential and SMB Sales and Marketing organization, and Spectrum Community Solutions in February of 2021.

Prior to joining Charter, Mr. Winfrey served as Chief Financial Officer of Unitymedia GmbH, Germany's second-largest cable operator, and as Managing Director for Unitymedia's cable operations, broadcasting and satellite entities. Earlier in his career, Mr. Winfrey served as Senior Vice President, Corporate Finance and Development at Cablecom, GmbH. He was previously a Director of Financial Planning and Analysis and Director of Operations Services of NTL Incorporated's continental European operations, and a senior associate in the private equity group at Communications Equity Associates.

Mr. Winfrey has spent more than 25 years in the cable industry, and in 2015 received The Internet & Television Association's (NCTA) Vanguard Award for Young Leadership. He currently serves on the Boards of the NCTA, CableLabs and National Urban League.

He received a B.S. in accounting and an MBA from the University of Florida.

Jessica Fischer, Chief Financial Officer

Jessica Fischer was named Chief Financial Officer of Charter Communications in October 2021. Ms. Fischer oversees Accounting, Finance, Tax and Risk Management, Procurement, Investor Relations, Internal Audit, and Corporate Budgeting and Planning. Additionally, she manages Charter's equity and capital markets strategy and execution, as well as M&A and investing activity.

Ms. Fischer most recently served as Executive Vice President of Finance and joined Charter as Corporate Treasurer in 2017. Before joining Charter, she was a partner in the National Tax Department at EY where she advised clients on the tax structuring and implementation of partnership transactions primarily in the media and telecommunications space, including advising Charter on its transactions with Time Warner Cable and Bright House Networks in 2016.

She is a graduate of Washington University in St. Louis, where she earned a B.S. in business administration in accounting and managerial economics, and a master of science in business administration with a concentration in accounting.

Rich DiGeronimo, President, Product and Technology

Rich DiGeronimo was named President, Product and Technology in December 2022. He most recently served as Chief Product and Technology Officer overseeing Charter's product, engineering, software development, digital platforms, information technology, network operations, advertising sales, and business development organizations. In September 2022, oversight of Charter's Programming Acquisition team was added to his responsibilities.

Mr. DiGeronimo joined Charter in 2008 as Vice President of Product Management and has served in several leadership roles, including Senior Vice President of Product and Strategy, Executive Vice President of Product and Strategy, and Executive Vice President, Chief Product Officer. He joined Charter from Level 3 Communications, where he served as Vice President and General Manager of the Cable Markets Group. He also held leadership roles in product management and corporate finance over his eight years at Level 3. Mr. DiGeronimo started his career at Bear Stearns where he focused on technology investment banking.

Mr. DiGeronimo was named Women in Cable Telecommunications (WICT) Rocky Mountain Mentor of the Year in 2015 and serves on the board of Adaptive Spirit, the primary fundraiser for the United States Paralympics Ski and Snowboard Teams.

He received a BBA from the Ross School of Business at the University of Michigan where he graduated with High Distinction.

Jamal Haughton, Executive Vice President, General Counsel and Corporate Secretary

As Executive Vice President, General Counsel and Corporate Secretary, Mr. Haughton serves as Charter's chief legal officer and oversees all legal functions across a broad range of disciplines

including corporate, commercial, transactional, litigation, product, and programming, as well as regulatory legal matters.

Mr. Haughton joined Charter in 2023 from Madison Square Garden Entertainment Corp. (MSG Entertainment), where he served as the Company's Executive Vice President, General Counsel and Corporate Secretary, working closely with executive leadership to support MSG Entertainment's long-term direction and growth.

Prior to MSG Entertainment, Mr. Haughton served as Senior Vice President and General Counsel at Samsung Electronics America, Inc. He served as Samsung's chief legal officer for the U.S. and was responsible for providing counsel to the CEO and senior leadership on all legal matters affecting Samsung and its subsidiaries. Mr. Haughton spent 10 years at Cablevision Systems Corporation in roles of increasing responsibility. In his last role at Cablevision as Senior Vice President, Associate General Counsel and Assistant Secretary, Mr. Haughton provided ongoing legal counsel to the Board of Directors and senior executive management on corporate governance, public company reporting, corporate finance and major strategic company-wide corporate transactions, including Cablevision's sale to Altice USA in 2016.

Mr. Haughton began his legal career in the New York office of Cravath, Swaine & Moore LLP, where he spent seven years in the firm's Corporate Practice where he specialized in domestic and cross-border mergers and acquisitions, corporate finance, and securities law matters. Mr. Haughton has been recognized with several industry honors including Chambers' "Global Top 100 GC Influencers" (2019).

Mr. Haughton received his J.D. from Yale Law School and his B.A. from the University of Michigan.

Kevin Howard, Executive Vice President, Chief Accounting Officer and Controller

Kevin D. Howard is Executive Vice President, Chief Accounting Officer and Controller at Charter Communications. He joined Charter in 2002 as Director of Financial Reporting, was promoted as the Company's Chief Accounting Officer and Controller in 2006. He also served as Interim Chief Financial Officer from August 1, 2010 through October 31, 2010. Mr. Howard is responsible for Charter's operational and technical accounting, financial reporting, payables, and enterprise resource planning operations.

Mr. Howard joined Charter from Arthur Andersen LLP, where he served as an auditor in the audit division for nearly a decade. He is a certified public accountant and a certified managerial accountant.

He received a B.S. in finance and economics from the University of Missouri-Columbia.

Magesh Srinivasan, Executive Vice President, Network Operations

Magesh Srinivasan is Executive Vice President, Network Operations for Charter Communications, and is responsible for network operations across Charter's 41-state footprint.

He joined Charter in 2016, and most recently served as Senior Vice President in Network Operations, first in Core and Backbone Operations and most recently in Video Operations. Prior to that, he served in several senior engineering roles at Time Warner Cable, including as Group Vice President of Commercial Engineering and Operations, Vice President of Commercial Engineering for Time Warner Cable's West Region, and Director in the Texas Region.

Mr. Srinivasan began his career at Sprint in a series of engineering roles with increased responsibility.

He received a B.S. from Anna University, a master's degree and doctorate in materials science from Kansas State University, and a master's degree in business administration from the Graduate School of Business at the University of Kansas.

Appendix I

See Attachment A of the Application which contains the Sworn Affidavit and Explanation of Exceptions.

Appendix L

Financial Instrument

Please see attached corporate guarantee by Charter Communications Operating, LLC (“Charter Operating”) provided for the benefit of TWC IP Enabled Services, LLC. Charter Operating is an intermediate holding company in the Charter Communications, Inc. family of companies, and is the subsidiary of Charter Communications, Inc., which is the ultimate parent of Applicants. In 2024, Charter Communications, Inc. reported more than \$55 billion in revenue and approximately \$5.1 billion in net income. *See* Charter Communications, Inc., Annual Report (Form 10-K), at 38 (Jan. 30, 2025).

While Decision (“D.”) 24-11-003, Appendix F.2, requires applicants to demonstrate that they have a minimum of \$25,000 to be used solely for deposits, TWC IP Enabled Services, LLC does not anticipate being required to provide deposits with local exchange or interexchange carriers. Accordingly, this requirement appears inapplicable, consistent with the Commission’s past practice of waiving the financial showing of deposits where no deposit is expected to be required. *See, e.g., Re Ting Telecom California*, D.23-02-007, 2023 Cal. PUC LEXIS 40 at *10-*11 (“Ting Telecom must also demonstrate that an amount equal to the deposit required by AT&T California, Frontier, Consolidated and Citizens would be available to Ting Telecom for one year following certification. Ting Telecom stated that no deposit is required by these carriers. Therefore, no additional resources are required at this time to cover deposits.”); *Re Starlink Services, LLC*, D.22-10-023, 2022 Cal. PUC LEXIS 456 at *12 (same for Starlink). Nevertheless, and out of an abundance of caution, TWC IP Enabled Services, LLC submits the corporate guarantee referenced above.

Additionally, in accordance with Section 4(g) of Appendix F (Financial Requirements for CPCN and Section 1013 Registration Applications) of Decision D.24-11-003, TWC IP Enabled Services, LLC provides the attached bond issued to TWC IP Enabled Services, LLC in the amount of \$25,000.



July 15, 2025

VIA ELECTRONIC DELIVERY

Rachel Peterson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Re: Guarantee Issued by Charter Communications, Inc. for the Benefit of its Affiliate
TWC IP Enabled Services, LLC**

Dear Executive Director Peterson:

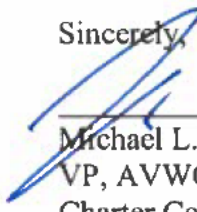
Charter Communications Operating, LLC ("Charter"), an intermediate holding company and indirect subsidiary of Charter Communications, Inc. that wholly owns TWC IP Enabled Services, LLC ("Applicant"), issues this guarantee in support of the Application of TWC IP Enabled Services, LLC for a Certificate of Public Convenience and Necessity Pursuant to Public Utilities Code Section 1001 ("Application").

Pursuant to Decision ("D.") 24-11-003, Appendix F.2, Applicant must "demonstrate that they have a minimum of \$25,000 to be used solely for deposits required by local exchange companies or interexchange carriers."

By this letter, Charter guarantees the availability of \$25,000 to be used solely for deposits required by local exchange companies or interexchange carriers, consistent with the requirements of D.24-11-003, Appendix F.4.

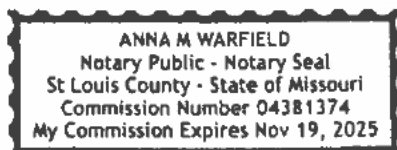
If you have any questions concerning this letter, please contact Applicant's counsel Zeb Zankel by phone at (628) 267-6812 or by email at ZZankel@jenner.com.

Sincerely,



Michael L. Scanlon
VP, AVWO-Circuit Operations
Charter Communications, Inc.

Sworn and subscribed before me this 16th day of July, 2025.





Notary Public

LICENSE OR
PERMIT BOND

Bond

108012774

LICENSE OR PERMIT BOND

KNOW ALL BY THESE PRESENTS, That we, TWC IP Enabled Services, LLC
12405 Powerscourt Drive Suite 100 St. Louis, MO 63131
as Principal, and the Travelers Casualty and Surety Company of America, a Connecticut corporation,
as Surety, are held and firmly bound unto California Public Utilities Commission
505 Van Ness Avenue San Francisco, CA 94102, as Obligee,

in the sum of Twenty-five Thousand & 00/100 Dollars (\$25,000.00)

for which sum, well and truly to be paid, we bind ourselves, our heirs, executors, administrators, successors and assigns, jointly and severally, firmly by these presents.

Signed and sealed this 12th day of April, 2024.

THE CONDITION OF THIS OBLIGATION IS SUCH, That WHEREAS, the Principal has been or is about to be granted a license or permit to do business as Switchless reseller Facilities-based carrier by the Obligee.

NOW, Therefore, if the Principal well and truly comply with applicable local ordinances, and conduct business in conformity therewith, then this obligation to be void; otherwise to remain in full force and effect.

PROVIDED, HOWEVER; 1. This bond shall continue in force:

☐ Until _____, _____, or until the date of expiration of any Continuation Certificate executed by the Surety

OR
☒

Until canceled as herein provided.

2 This bond may be canceled by the Surety by the sending of notice in writing to the Obligee, stating when, not less than thirty days thereafter, liability hereunder shall terminate as to subsequent acts or omissions of the Principal.

TWC IP Enabled Services, LLC
by Charter Communications, Inc., its Manager

Principal

By

Jason R. Schlueter
Jason R. Schlueter, VP Risk Management & Treasury

Travelers Casualty and Surety Company of America

By

Karen L. Roider
Karen L. Roider Attorney-in-Fact



Travelers Casualty and Surety Company of America
Travelers Casualty and Surety Company
St. Paul Fire and Marine Insurance Company

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That Travelers Casualty and Surety Company of America, Travelers Casualty and Surety Company, and St. Paul Fire and Marine Insurance Company are corporations duly organized under the laws of the State of Connecticut (herein collectively called the "Companies"), and that the Companies do hereby make, constitute and appoint Karen L. Roider of St. Louis, Missouri, their true and lawful Attorney(s)-in-Fact to sign, execute, seal and acknowledge any and all bonds, recognizances, conditional undertakings and other writings obligatory in the nature thereof on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

IN WITNESS WHEREOF, the Companies have caused this instrument to be signed, and their corporate seals to be hereto affixed, this **21st** day of **April**, 2021.



State of Connecticut

By: 
 Robert L. Raney, Senior Vice President

City of Hartford ss.

On this the **21st** day of **April**, 2021, before me personally appeared **Robert L. Raney**, who acknowledged himself to be the Senior Vice President of each of the Companies, and that he, as such, being authorized so to do, executed the foregoing instrument for the purposes therein contained by signing on behalf of said Companies by himself as a duly authorized officer.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

My Commission expires the **30th** day of **June**, 2026




 Anna P. Nowik, Notary Public

This Power of Attorney is granted under and by the authority of the following resolutions adopted by the Boards of Directors of each of the Companies, which resolutions are now in full force and effect, reading as follows:

RESOLVED, that the Chairman, the President, any Vice Chairman, any Executive Vice President, any Senior Vice President, any Vice President, any Second Vice President, the Treasurer, any Assistant Treasurer, the Corporate Secretary or any Assistant Secretary may appoint Attorneys-in-Fact and Agents to act for and on behalf of the Company and may give such appointee such authority as his or her certificate of authority may prescribe to sign with the Company's name and seal with the Company's seal bonds, recognizances, contracts of indemnity, and other writings obligatory in the nature of a bond, recognizance, or conditional undertaking, and any of said officers or the Board of Directors at any time may remove any such appointee and revoke the power given him or her; and it is

FURTHER RESOLVED, that the Chairman, the President, any Vice Chairman, any Executive Vice President, any Senior Vice President or any Vice President may delegate all or any part of the foregoing authority to one or more officers or employees of this Company, provided that each such delegation is in writing and a copy thereof is filed in the office of the Secretary; and it is

FURTHER RESOLVED, that any bond, recognizance, contract of indemnity, or writing obligatory in the nature of a bond, recognizance, or conditional undertaking shall be valid and binding upon the Company when (a) signed by the President, any Vice Chairman, any Executive Vice President, any Senior Vice President or any Vice President, any Second Vice President, the Treasurer, any Assistant Treasurer, the Corporate Secretary or any Assistant Secretary and duly attested and sealed with the Company's seal by a Secretary or Assistant Secretary; or (b) duly executed (under seal, if required) by one or more Attorneys-in-Fact and Agents pursuant to the power prescribed in his or her certificate or their certificates of authority or by one or more Company officers pursuant to a written delegation of authority; and it is

FURTHER RESOLVED, that the signature of each of the following officers: President, any Executive Vice President, any Senior Vice President, any Vice President, any Assistant Vice President, any Secretary, any Assistant Secretary, and the seal of the Company may be affixed by facsimile to any Power of Attorney or to any certificate relating thereto appointing Resident Vice Presidents, Resident Assistant Secretaries or Attorneys-in-Fact for purposes only of executing and attesting bonds and undertakings and other writings obligatory in the nature thereof, and any such Power of Attorney or certificate bearing such facsimile signature or facsimile seal shall be valid and binding upon the Company and any such power so executed and certified by such facsimile signature and facsimile seal shall be valid and binding on the Company in the future with respect to any bond or understanding to which it is attached.

I, **Kevin E. Hughes**, the undersigned, Assistant Secretary of each of the Companies, do hereby certify that the above and foregoing is a true and correct copy of the Power of Attorney executed by said Companies, which remains in full force and effect.

Dated this 12th day of April, 2024.




 Kevin E. Hughes, Assistant Secretary

To verify the authenticity of this Power of Attorney, please call us at 1-800-421-3880.
Please refer to the above-named Attorney(s)-in-Fact and the details of the bond to which this Power of Attorney is attached.