



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

Application of Velocity IG Operations, LLC for a Certificate of Public Convenience and Necessity to Provide Full Facilities-Based and Resold Competitive Local Exchange Service and Interexchange Service in California.

Application No. _____

FILED
03/09/26
04:59 PM
A2603002

**APPLICATION OF VELOCITY IG OPERATIONS, LLC FOR
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
PURSUANT TO PUBLIC UTILITIES CODE SECTION 1001**

PUBLIC VERSION

Leetal Weiss
Morgan Lewis & Bockius LLP
300 South Grand Ave., 22nd Floor
Los Angeles, CA 90071-3132
Tel: 213-612-2500
Fax: 213-612-2501
leetal.weiss@morganlewis.com

Counsel for Velocity IG Operations, LLC

Dated: March 9, 2026

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

Application of Velocity IG Operations, LLC for a Certificate of Public Convenience and Necessity to Provide Full Facilities-Based and Resold Competitive Local Exchange Service and Interexchange Service in California.

Application No. _____

**APPLICATION OF VELOCITY IG OPERATIONS, LLC FOR
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
PURSUANT TO PUBLIC UTILITIES CODE SECTION 1001**

PUBLIC VERSION

Pursuant to the Rules of Practice and Procedure (the “Rules”) of the California Public Utilities Commission (the “Commission”), Velocity IG Operations, LLC (“Applicant”), by and through its counsel, files this application (“Application”) for a Certificate of Public Convenience and Necessity (“CPCN”) to provide full facilities-based and resold competitive local exchange service and interexchange service in California.¹

Correspondence regarding this Application should be addressed to:

Leetal Weiss
Morgan Lewis & Bockius LLP
300 South Grand Ave., 22nd Floor
Los Angeles, CA 90071-3132
Tel: 213-612-2500
Fax: 213-612-2501
leetal.weiss@morganlewis.com

Nick Szczur
Velocity IG Operations, LLC
204 S. Union Street
Alexandria, VA 22314
703-519-2000
nick.szczur@colcap.com

Notices, orders and other pleadings may be served upon these persons, and such service shall be deemed to be service upon the Applicant.

¹ The filing fee in the amount of \$680.00 is being provided via overnight carrier.

PUBLIC VERSION - CONFIDENTIAL INFORMATION EXTRACTED

WHEREFORE, Applicant respectfully requests that the Commission enter a Decision granting this Application, thereby conferring on Applicant a CPCN to provide full facilities-based and resold competitive local exchange service and interexchange service in California.

Dated at Los Angeles, California this 9th day of March 2026.

Respectfully submitted,

/s/ Leetal Weiss

Leetal Weiss

Morgan Lewis & Bockius LLP

300 South Grand Ave., 22nd Floor

Los Angeles, CA 90071-3132

Tel: 213-612-2500

Fax: 213-612-2501

leetal.weiss@morganlewis.com

Counsel for Velocity IG Operations, LLC

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	04/23/26	<input type="checkbox"/>	
<input checked="" type="checkbox"/> Scoping Memo	05/08/26	<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	06/08/26	<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)			
<input checked="" type="checkbox"/> 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.			
<input checked="" type="checkbox"/> Whether the proposed construction is eligible for the Commission’s 21 day expedited process for CEQA review.			
<input type="checkbox"/> Consideration of a safety issue. (Provide a description of the issue below.)			
<input type="checkbox"/> 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.)			
<input type="checkbox"/> Other (Provide a description of the issue(s) below.)			

<p>6. APPLICANT WILL OPERATE AS (check all that apply)</p>		
<p><input checked="" type="checkbox"/> Competitive Local Exchange Service Provider</p> <p>6.a. Proposed Facilities</p> <p><input checked="" type="radio"/> Full Facilities-Based <input type="radio"/> Limited Facilities-Based</p> <p><input checked="" type="checkbox"/> Switchless-Reseller / Non-Facilities-Based</p> <p>6.d. Service Territories</p> <p><input checked="" type="checkbox"/> Within ALL the service territories of uniform regulatory framework incumbent local exchange carrier</p> <p><input type="checkbox"/> Within ALL the service territories of the small incumbent local exchange carrier</p> <p><input type="checkbox"/> In specific portions of the state only (Appendix C)</p>	<p><input checked="" type="checkbox"/> Interexchange (Intra/Inter-LATA) Service Provider</p> <p>6.b. Proposed Facilities</p> <p><input checked="" type="radio"/> Full Facilities-Based <input type="radio"/> Limited Facilities-Based</p> <p><input checked="" type="checkbox"/> Switchless-Reseller / Non-Facilities-Based</p> <p>6.e. Service Territories</p> <p><input checked="" type="radio"/> Throughout the state of California.</p> <p><input type="radio"/> In specific portions of the state only (Appendix C)</p>	<p><input type="checkbox"/> Fixed Interconnected Voice over Internet Protocol (VoIP) Service Provider</p> <p>6.c. Proposed Facilities</p> <p><input type="radio"/> Full Facilities-Based <input type="radio"/> Limited Facilities-Based <input type="checkbox"/> Non-Facilities-Based</p> <p>6.f. Service Territories</p> <p><input type="checkbox"/> Within the service territories of uniform regulatory framework incumbent local exchange carriers</p> <p><input type="checkbox"/> Within the service territories of small incumbent local exchange carrier</p> <p><input type="checkbox"/> In specific portions of the state only (Appendix C)</p>
<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**)

01/01/28

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.)

Applicant currently intends to focus on the provision of fiber optic infrastructure for use by other telecommunications providers and other large commercial customers.

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 MANAGERIAL AND TECHNICAL EXPERTISE TO OPERATE AS A SERVICE PROVIDER OF THE TYPE INDICATED IN SECTION 6 OF THIS FORM.

TRUE

Attach **Appendix G** with the following: 1) 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, and 2) all resumes for each personnel identified listing 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.a. APPLICANT ATTESTATION

TRUE NOT TRUE (Appendix H)

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 H** 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 I** 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 J** with list of categorical exemptions and briefly explain the applicability of each exemption to the proposed construction.
- NO. Attach **Appendix J** with Preliminary Environmental Assessment.

13. FINANCIAL REQUIREMENT

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 K** containing a financial instrument pursuant to Appendix F of D.24-11-003 that demonstrates the Applicant's financial ability as required above.

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

- TRUE NOT TRUE (Attach **Appendix L** with Applicant's Draft Initial Tariff)

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

- NONE
- CURRENT AND/OR PRIOR, specify:

16. PERFORMANCE BOND REQUIREMENT

TRUE

Applicant attests that, upon approval of its request, it will comply with the California Public Utilities Commission's performance bond requirements in accordance with Decision (D.) 10-09-017, D.11-09-026, D.13-05-035 and D.24-11-003.

California Public Utilities Commission

Page 7 of 7 CPCN Application Form – Telephone Corporation

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 John T. Siegel, Jr.
John T. Siegel, Jr. (Dec 10, 2025 10:20:41 EST)

Name John Siegel

Title President and Secretary

Dated Dec 10, 2025

Address 204 S. Union Street, Alexandria, VA 22314

Telephone (703) 519-2000

Email Address john.siegel@colcap.com

PUBLIC VERSION - CONFIDENTIAL INFORMATION EXTRACTED

California Public Utilities Commission
Attachment A for CPCN Application Form – Telephone Corporation
(rev June 2025)

ATTACHMENT A

SWORN AFFIDAVIT

Name of Applicant/Company Velocity IG Operations, LLC

My name is John Siegel. I am President and Secretary of Velocity IG Operations, LLC. My personal knowledge of the facts stated herein has been derived from my employment with Velocity IG Operations, LLC.

I affirm that Velocity IG Operations, 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;
- Certifies that all responses to the attached Application for CPCN are true and correct; and

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 are true and correct.

John T. Siegel, Jr.

John T. Siegel, Jr. (Dec 10, 2025 10:20:41 EST)

Signature

John Siegel, President and Secretary

Name and Title

APPENDIX LIST

Appendix A.1	Organizing Documents
Appendix A.2	Evidence of Qualification to Transact Business in California
Appendix A.3	Certificate of Good Standing Status certified by the Secretary of State of California
Appendix F	Affiliated Entities
Appendix G	List of Officers, Directors, Partners, Agents or Owners, and Resumes
Appendix I	Construction or Extension of Facilities
CONFIDENTIAL Appendix I.11.j	Customer Estimates
Appendix J	Preliminary Environmental Assessment
CONFIDENTIAL Appendix K	Financial Instrument

APPENDIX A.1

Organizing Documents

Delaware

The First State

Page 1

I, CHARUNI PATIBANDA-SANCHEZ, 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 "VELOCITY IG OPERATIONS, LLC", FILED IN THIS OFFICE ON THE TWENTY-FOURTH DAY OF JULY, A.D. 2025, AT 3:12 O`CLOCK P.M.



C. P. Sanchez

Charuni Patibanda-Sanchez, Secretary of State

10272292 8100
SR# 20253462846

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

Authentication: 204289545

Date: 07-24-25

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:12 PM 07/24/2025
FILED 03:12 PM 07/24/2025
SR 20253462846 - File Number 10272292

CERTIFICATE OF FORMATION

OF

VELOCITY IG OPERATIONS, LLC

This Certificate of Formation of VELOCITY IG OPERATIONS, LLC, a Delaware limited liability company (the "*Company*") is being executed by the undersigned for the purpose of forming a limited liability company pursuant to §18-201 of the Limited Liability Company Act of the state of Delaware.

FIRST: The name of the Company is: VELOCITY IG OPERATIONS, LLC.

SECOND: The address of the limited liability company's registered office in the State of Delaware is 850 New Burton Road, Suite 201, in the City of Dover, County of Kent, Delaware 19904. The registered agent of the limited liability company at that address is Cogency Global Inc.

IN WITNESS WHEREOF, the undersigned, being the individual forming the Company, has executed, signed and acknowledged this Certificate of Formation as of July 24, 2025.

By: /s/Benjamin Lewis
Name: Benjamin Lewis
Title: Authorized Representative

APPENDIX A.2

Evidence of Qualification to Transact Business in California



California Secretary of State

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

Velocity IG Operations, LLC
204 S. UNION STREET
ALEXANDRIA, VA 22314

Initial Business Filing Approved

August 14, 2025

Entity Name: Velocity IG Operations, LLC
Entity Type: Limited Liability Company - Out of State
Entity No.: B20250248104
Document Type: Initial Filing
Document No.: B20250248104
File Date: 08/11/2025

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](http://bizfileCalifornia), the California Secretary of State's business portal for online filings, searches, business records, and additional resources.



California Secretary of State

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

Thank You for Doing Business in California

Congratulations on your new business registration with the California Secretary of State (SOS).

What's next?

1. Resources for Businesses Just Starting – The Secretary of State provides additional business resources at bizfile.sos.ca.gov to help guide you through the process of starting your business, including:
 - Starting A Business Guide & Checklist – www.sos.ca.gov/business-programs/business-entities/starting-business-checklist/ for key steps you may need to take when launching a business in California.
 - SOS Business Resources – www.sos.ca.gov/business/be/resources for a list of agencies you may need to contact to ensure proper compliance with California state law.
2. Corporations and Limited Liability Companies Can File SOS Statement of Information Online – For faster service, file your initial Statement of Information and any future Statements of Information anytime online by logging into your bizfile Online account at bizfileOnline.sos.ca.gov. To file, select the Statement of Information document, complete and submit online. Statements by Common Interest Development Association also can be filed online with your Statement of Information.

You are required to file a Statement of Information within the first 90 days of registering your business with the SOS and you are statutorily required to maintain your business by filing a Statement of Information, either every year for stock corporations or every other year for nonprofit corporations and LLCs, before the end of the calendar month of the original registration date. Please see the table below for your specific entity type. NOTE: You may be assessed a \$250 penalty for not filing your Statement of Information.

Entity Type (Jurisdiction)	Initial Due Date	Frequency of Filing
All Stock Corporations (California)	Within 90 Days	Annually
Out-Of-State Corporations	Within 90 Days	Annually
Credit Unions	Within 90 Days	Annually
Agricultural Cooperatives (California)	Within 90 Days	Annually
Canabis Cooperative Associations	Within 90 Days	Annually
General Cooperatives	Within 90 Days	Every Other Year
Nonprofit Corporations (California)	Within 90 Days	Every Other Year
Nonprofit Corporations - Common Interest Development*	Within 90 Days	Every Other Year
Limited Liability Companies	Within 90 Days	Every Other Year
All Other Business Entity Types	Statement Of Information Not Required	

* Corporations formed as a Common Interest Development must file a Statement by Common Interest

Development with their Statement of Information.

3. Franchise Tax Board (FTB) Tax Filing – Once your entity is registered with the SOS, you are required to file a tax return with FTB for each taxable year, even if you are not conducting business or have no income. Contact FTB at www.ftb.ca.gov or (800) 852-5711 for forms and requirements concerning franchise taxes or income taxes.

Be aware, if you fail to file a return by the original or extended due date, or fail to pay taxes when due, a penalty may be imposed by FTB. Please visit www.ftb.ca.gov/businesses/Penalty-Information.shtml for tax penalty related information.

4. Business Names and Trademarks

Registration of a business with the Secretary of State does not in itself establish a trademark for the business name. There is a separate legal process to establish a trademark or service mark. Additionally, registration of a business with the Secretary of State does not authorize the use of a business name in violation of another person's or entity's rights to the name, such as infringement of a trademarked word or phrase.

The Secretary of State's office maintains registration and all updates of California state trademarks and service marks. Information is accessible via our California Trademark Search at tmbizfile.sos.ca.gov/search, which also provides free PDF copies of imaged Trademark documents.

For more information on the registration of business names and registering a trademark, visit:

- General provisions governing trademarks and service marks are found in the Model State Trademark Law – [California Business and Professions Code sections 14200 et seq](#)
 - Federal Trademark Act – [United States Code, Title 15, Chapter 22, section 1051 et seq.](#)
 - California Fictitious Business Name Law – [Business and Professions Code section 17900 et seq.](#)
 - Common law rights, including rights to a trade name.
- If you have any questions regarding such rights, please consult a private attorney.

5. Nonprofit Corporations

Nonprofit corporations in California are not automatically exempt from paying California franchise taxes or income taxes each year. For information about tax requirements and/or applying for tax exempt status, please contact the appropriate taxing agency listed below. If you are a domestic nonprofit public benefit corporation, you likely have filing requirements with the California Office of the Attorney General. https://oag.ca.gov/sites/all/files/agweb/pdfs/charities/publications/guide_for_charities.pdf

Other Business Information and Resources

All business entities are subject to state and federal tax laws. You may wish to contact the following agencies to assist you with tax or other business-related issues:

- Internal Revenue Service – www.irs.gov or call (800) 829-4933 for forms and issues concerning Federal tax, employer identification numbers, subchapter S elections.
- California Department of Tax and Fee Administration – www.cdtfa.ca.gov or call (800) 400-7115 for forms and issues concerning sales taxes, use taxes or other special taxes and fees administered by the California Department of Tax and Fee Administration.
- Employment Development Department – www.edd.ca.gov or call (888) 745-3886 for forms and issues concerning employment and payroll taxes.
- California State Board of Equalization – www.boe.ca.gov or call (916) 274-3350 for forms and issues concerning property taxes, alcoholic beverage taxes, and taxes on insurers.

- State Compensation Insurance Fund – www.statefundca.com or call (888) 782-8333 for information or to get a quote for workers' compensation insurance.
- Department of Industrial Relations, Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA - www.dir.ca.gov or call (800) 963-9424 for guidance on workplace safety and health regulations in California.
- CalGold – www.calgold.ca.gov for appropriate permit, licensing, and contact information for the various agencies that administer and issue these permits.
- CA Governor's Office of Business and Economic Development (Go-Biz) – www.business.ca.gov for a range of business services including, site selection and permit assistance.
- The California Business Incentives Gateway (CBIG) – cbig.ca.gov is a web portal that connects business owners and entrepreneurs with financial incentives.



Secretary of State Certificate of Qualification / Registration

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

Entity Name: Velocity IG Operations, LLC
Entity No.: B20250248104
Registration Date: 08/11/2025
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 August 13, 2025.

A handwritten signature in black ink, appearing to read "S. N. Weber", written over a horizontal line.

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

Certificate No.: 357528627

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

I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "VELOCITY IG OPERATIONS, 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 ELEVENTH DAY OF AUGUST, A.D. 2025.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "VELOCITY IG OPERATIONS, LLC" WAS FORMED ON THE TWENTY-FOURTH DAY OF JULY, A.D. 2025.

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



Charuni Patibanda-Sanchez, Secretary of State

Authentication: 204441574

Date: 08-11-25

10272292 8300

SR# 20253634344

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

B3925-5936 08/11/2025 12:42 PM Received by California Secretary of State

APPENDIX A.3

Certificate of Good Standing Status Certified by the Secretary of State of California

Real time verification of Velocity IG Operations, LLC's (the "Applicant") good standing with the Secretary of State may be found at <https://bizfileonline.sos.ca.gov/search/business>. Applicant's entity number is B20250248104. A search of the site on March 6, 2026, shows Applicant as "active" and therefore "authorized to transact intrastate business in California."¹

¹ The definition can be found at: <https://www.sos.ca.gov/business-programs/business-entities/cbs-field-status-definitions#status>.

APPENDIX F

Affiliated Entities

Applicant's sole member is Velocity Infrastructure Group Holdings, LLC. Additionally, Applicant is affiliated with the entities listed in **Appendix G**.

Applicant also advises that an affiliate Bandwidth IG, LLC (U-7336-C) ("Bandwidth IG") is authorized by the Commission to provide resold and competitive full facilities-based local and interexchange telecommunications services in the territories of Pacific Bell Telephone Company, Frontier California, Inc., Consolidated Communications of California, and Citizens Telecommunications Company of California, Inc., originally granted in Decision 18-03-007 on March 1, 2018.² Bandwidth IG is owned and controlled by a Columbia Capital investment fund separate and distinct from the Columbia Capital investment funds that own and control Applicant, but Applicant provides the above information regarding Bandwidth IG out of an abundance of caution.³

² The authorization was originally granted in the name of Silica Networks, Inc. ("Silica"), a California corporation. On June 21, 2019, Silica underwent a corporate conversion to become Silica Networks, LLC, a California limited liability company. On June 24, 2019, Silica underwent a redomestication to become a Delaware limited liability company. On June 10, 2020, Silica filed Advice Letter No. 3 regarding Silica's legal name change to Bandwidth Infrastructure Group CA, LLC ("BIG-CA"). On July 12, 2021, BIG-CA filed Advice Letter No. 5 regarding BIG-CA's legal name change to Bandwidth IG, LLC.

³ The Commission approved the transfer of control of Bandwidth IG (then known as Silica Networks, LLC) to Columbia Capital Equity Partners VI, (QP) L.P. in Decision 20-02-054 on February 27, 2020. As further described below in **Appendix G**, Applicant is owned and controlled by the Columbia Capital investment funds Columbia Capital Equity Partners VIII-A, L.P. and Columbia Capital Equity Partners VIII-B, L.P. rather than Columbia Capital Equity Partners VI, (QP) L.P.

APPENDIX G

List of Officers, Directors, Partners, Agents or Owners

Section 10 of the of the CPCN Application Form Pursuant to the Public Utilities Code Section 1001 requires listing 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.

Applicant does not have any directors, and its officers are as follows:

John Siegel – President and Secretary
James Fleming – Chief Executive Officer
Benjamin Lewis – Chief Operating Officer
Jason Lee – Chief Financial Officer and Treasurer

All management can be reached at 204 S. Union St. Alexandria, VA 22314.

Applicant is a Delaware limited liability company. The following entities hold a ten percent (10%) or greater direct or indirect ownership interest in Applicant:

Entity Name	Jurisdiction of Organization	Principal Business	Voting Interest	Equity Interest
Velocity Infrastructure Group Holdings, LLC	Delaware	Holding Company	0.00%	100% (as sole member in Applicant)
Columbia Capital Equity Partners VIII-A, L.P.	Delaware	Venture Capital Fund	51.79%	51.79%
Columbia Capital Equity Partners VIII-B, L.P.	Delaware	Venture Capital Fund	48.21%	48.21%
Columbia Capital Equity Partners VIII, L.P.	Delaware	General Partner of Venture Capital Fund	100.00%	3.15%
Columbia Capital VIII, LLC	Delaware	Ultimate General Partner of Venture Capital Fund	100.00%	0.00%
James B. Fleming Jr.	USA	Manager of Ultimate General Partner of Venture Capital Fund	20.00%	0.79%
John T. Siegel, Jr.	USA	Manager of Ultimate General Partner of Venture Capital Fund	20.00%	0.65%

PUBLIC VERSION - CONFIDENTIAL INFORMATION EXTRACTED

Entity Name	Jurisdiction of Organization	Principal Business	Voting Interest	Equity Interest
Jason R. Booma	USA	Manager of Ultimate General Partner of Venture Capital Fund	20.00%	0.47%
Monish Kundra	USA	Manager of Ultimate General Partner of Venture Capital Fund	20.00%	0.56%
Patrick B. Hendy	USA	Manager of Ultimate General Partner of Venture Capital Fund	20.00%	0.56%
[BEGIN CONFIDENTIAL]				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[END CONFIDENTIAL]				

To Applicant's knowledge, no other person or entity, directly or indirectly, owns or controls a ten percent (10%) or greater interest in Applicant.

Resumes

John Siegel – President and Secretary

John focuses on Digital Infrastructure and Enterprise Technology Services investments and has over two decades of experience overseeing companies in the broadband, network infrastructure and broader TMT space. John is currently a member of the Board of Directors of Bandwidth IG, Bluewave, Everstream Analytics, Landways, Summit IG, Telarus, TerraPact, Vivacity Infrastructure Group, and Xenith IG. John previously served on the boards of ICG Communications (acquired by Level 3), New Global Telecom (acquired by Comcast), New Signature (acquired by Cognizant), Presidio (acquired by American Securities), GTS CE (acquired by Deutsche Telekom), mindSHIFT (acquired by Best Buy), FDN Communications (acquired by NuVox), Virtustream (acquired by EMC), Cologix (majority stake acquired by Stonepeak), Cloud Sherpas (acquired by Accenture), Contino (acquired by Cognizant) and Zayo (NYSE: ZAYO) and represented Columbia Capital's interests in Mpower Communications (acquired by TelePacific). John worked in Morgan Stanley's Private Equity Group, where he specialized in investments in the telecommunications/data services arena. He also held positions with Fidelity Ventures, the private equity division of Fidelity Investments, and the Investment Banking Division of Alex. Brown & Sons, Incorporated. John received his B.A. from Princeton University and his M.B.A. from Harvard Business School.

James Fleming – Chief Executive Officer

Jim focuses on investments in the Data Center / Colocation, Cyber Security, Media and Mobility sectors. He is currently a director of CENTRA, CPG, Driven, Everstream Analytics, Groundswell, High Band Holdings, LB Spectrum, Omnispace, round2media, Three Forty-Five Holdings, Tract, Vela Infrastructure and Vivacity Infrastructure Group. He previously held board seats with AB Spectrum (wireless assets sold to T-Mobile), Altamira (acquired by ClearSky), Baja Broadband (acquired by TDS), CCTV (acquired by Light Squared), ExteNet Systems (acquired by Digital Bridge and Stonepeak), ICG Communications (acquired by Level 3 Communications), Local Media, Mobile Satellite Ventures, NextNav (NASDAQ:NN) Nuvox Communications (acquired by Windstream), Presidio (acquired by American Securities), SoundHouse (acquired by HarbourView), Taqua (acquired by Tekelec), The Tennis Channel (acquired by Sinclair Broadcasting), TVCC (acquired by Light Squared), WCS Wireless (acquired by NextWave Wireless), WNP Communications (acquired by XO Communications), XM Satellite Radio, and Zayo (NYSE: ZAYO), and has worked closely with a number of former Columbia portfolio companies including Digital Television Services (acquired by Pegasus Communications) and NeoWorld (acquired by Nextel). Jim received his B.A. from Stanford University.

Benjamin Lewis – Chief Operating Officer

Ben joined Columbia Capital in 2008 as Controller and served as Columbia's CFO until transitioning to be Chief Operating Officer and CCO in 2023. Prior to joining Columbia Capital, Ben worked in the Audit and Assurance practice for PricewaterhouseCoopers, LLP in Washington, DC. Ben received his B.S. of Business Administration from Bucknell University and is a licensed Certified Public Accountant in the Commonwealth of Virginia.

Jason Lee – Chief Financial Officer and Treasurer

Jason joined Columbia Capital in 2022 as Vice President of Finance and later transitioned to

become the Firm's Chief Financial Officer. Jason has more than 15 years of accounting experience, having spent 13 years at PricewaterhouseCoopers, LLP in McLean, Virginia where he served as a senior assurance manager and director. Jason received his B.B.A in Accounting from William & Mary and M.S. in Accounting from the University of Virginia.

Christopher Rabii – Manager

Christopher is responsible for all facets of Vivacity Infrastructure Group and its three operating divisions – eX² Technology, Terra Consulting Group and Vivacity Networks. He joined Vivacity in 2024 bringing more than 25 years of digital infrastructure experience, with particular focus on revenue growth, high-performance team building, as well as the deployment, operation and maintenance of large-scale fiber networks in support of Private Enterprise, Carrier, Hyperscale and other B2B customers. Christopher formerly served as Chief Executive Officer at FiberLight, LLC until its sale to Morrison & Co. Before his tenure at FiberLight, he was SVP of Technology, Fulfillment and Operations at Altice Business. Prior to Altice, Rabii served as SVP of Operations and Chief Technology Officer at Cablevision Lightpath and Vice President of Engineering at AboveNet Communications, Inc. Christopher is currently serving on the Board of Directors at Skywire Networks/Xchange Telecom. Christopher graduated from Rutgers University with a Ph.D. in Ceramic and Materials Engineering, focusing on specialty optical fibers.

Mike Brescio – Manager

Mike Brescio is Chief Financial Officer of Vivacity Infrastructure Group and leads Vivacity's financial strategy, planning and operations with 25 years of demonstrated financial leadership and strategic growth in the telecom, infrastructure and energy sectors. Mike began his career at General Electric, where he completed its Financial Management Program and held a series of finance roles focused on infrastructure investing. He then joined Hugh O'Kane Electric Company as its CFO where he oversaw the financial operations of the New York City-based telecom and electrical construction firm. During his tenure, he became the founding CFO for ZenFi Networks, a digital infrastructure company that deployed and owned an innovative 1,100-mile fiber network in and around NYC that simplified access to its high-count fiber cables and helped deliver free WiFi and small cell connectivity. Mike also led several major M&A deals and played a key role in delivering the LinkNYC project. Following ZenFi's acquisition by Boldyn Networks, Mike helped lead the integration and commercialization of the combined network assets. Mike holds a Bachelor's degree in Accounting and Information Systems from Boston College, an MBA from Columbia Business School, and is a licensed Certified Public Accountant (CPA).

APPENDIX I

Construction or Extension of Facilities

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

Applicant will be building multi-duct dark fiber underground infrastructure. Applicant intends to install or overlash its facilities, such as fiber optic cable and related equipment, primarily in existing conduits and other existing buildings and infrastructure. However, Applicant may need to undertake outside plant construction activities in order to serve some customer locations if, for example, there are no existing conduits or there is inadequate space in the existing conduits. Such activities may include trenching for the installation of underground conduit and the installation of new utility poles, equipment shelters, or other above-ground support structures.

Applicant expects that such construction ordinarily would be very small in scale, consisting of construction of short conduit extensions or stubs and installations of a limited number of poles or other above-ground facilities. Further, such construction generally would occur in existing roadways or other previously developed and disturbed rights-of-way.

11.b. List of competing entities

Zayo Group, LLC
CenturyLink Communications, LLC d/b/a Lumen
AT&T California
Verizon Communications Inc.
Citizens Telecommunications Company of California, Inc., d/b/a Frontier
Communications of California
Frontier California, Inc.
Other Certificated CLCs

11.c. Map showing proposed construction

Not applicable. See answer to 11.a.

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

Applicant will not require discretionary franchise or health and safety permits for construction or extension to provide the services described in this Application. Applicant will abide by all applicable permitting requirements if it carries out any construction activities authorized by the Commission.

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

Applicant submits that the public convenience and necessity justifies Commission approval of the Application. Applicant notes that, as described in 11.a., it currently does not intend to construct any facilities, other than equipment to be installed in existing buildings or structures.

Applicant seeks authority to provide facilities-based and resold competitive local exchange and interexchange telecommunications services throughout the State of California, primarily to provide dark fiber and colocation services. Applicant's service offerings will increase competition, improve the quality and efficiency of telecommunications services in the areas of California where Applicant will operate. As such, granting of this Application is in the public interest.

11.f. Statement showing cost of construction.

At this time, Applicant does not have any specific construction plans. Applicant does not currently own or lease facilities in California but rather will be building multi-duct dark fiber underground infrastructure to meet customer needs primarily in existing conduits and other existing buildings and infrastructure, as described above in 11.a. However, as described below in 11.g., Applicant possess the requisite financial ability to render service and contribute costs associated with any future construction needs.

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

Applicant possesses the requisite financial resources to provide the proposed services in California. As a newly formed company, Applicant does not have historical financial statements. Applicant has provided as CONFIDENTIAL Appendix K requisite financial instruments consistent with the options in D.24-11-003, Appendix F.

11.h. Statement showing proposed rates.

Applicant does not intend initially to offer basic service or switched access and therefore seeks an exemption from filing a tariff pursuant to GO 96-B, Telecommunications Industry Rule 5.8.⁴ Consistent with Decision 07-09-018, the Commission has granted exemptions from tariff filing requirements to CPCN applicants that did not offer residential basic service.⁵ Applicant will offer its service on a nondiscriminatory basis and at competitive rates but will do so through individually-negotiated contracts. Should Applicant later offer basic or switched access, Applicant will first comply with associated tariffing obligations.

11.i. Annual Report Statement.

No matters that must be reported pursuant to Section 2 of GO 104-A are known to have occurred. Applicant will file all reports required of a public utility under Commission jurisdiction in compliance with GO 104-A going forward.

⁴ G.O. 96-B, Telecommunications Industry Rule 5, provides that the Commission may "grant[] exceptions from the general requirement . . . that a Utility serve its California customers under its filed tariffs." In D.07-09-018, the Commission established detariffing rules for carriers such as CLCs.

⁵ See, e.g., D.11-12-014, D.12-08-036, and D.13-01-010.

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

Please see CONFIDENTIAL Appendix I.11.j.

CONFIDENTIAL APPENDIX I.11.i

Customer Estimates

[CONFIDENTIAL – SUBMITTED UNDER SEAL]



APPENDIX J

Preliminary Environmental Assessment

As described in Appendix I, 11.a, Applicant intends to install its facilities, such as fiber optic cable and related equipment, primarily in existing conduits and other existing buildings and infrastructure. No material adverse environmental impacts will result from such activities because no external construction will be involved.

Applicant expects that any outside plant construction ordinarily will be small in scale, consisting of construction of relatively short conduit routes, installations of poles or conduit, and installation or construction of other small above-ground facilities as conditions warrant. Further, such construction generally will occur in existing roadways or other previously developed and disturbed rights-of-way.

As the Commission has recognized previously, it can be expected that such projects will fall within one or more categorical exemptions under CEQA. *See, e.g.*, Decision 13-07-032, which granted full-facilities-based authority to Vodex Communications Corporation, subject to compliance with an expedited 21-day environmental review process.

To assure that there will be no significant adverse environmental impacts from any such construction, Applicant will follow the procedure described in Decision 13-07-032 to establish whether or not CEQA exemptions apply. If a determination is made that the proposed construction is not exempt, Applicant will file a new application for approval of the contemplated project. Applicant submits that the foregoing process assures that there is no possibility that grant of the instant application may have a significant adverse effect on the environment.

CONFIDENTIAL APPENDIX K

Financial Instruments

[CONFIDENTIAL - SUBMITTED UNDER SEAL]

Applicant attaches a bank statement and guaranty demonstrating that \$125,000 will be available to Applicant for (1) \$100,000 of unencumbered cash / equivalents for first year's operating expenses and (2) \$25,000 for deposits that may be required by local exchange or interexchange companies.