BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Digital Agent, LLC for a certificate of public convenience and necessity to provide Fixed Interconnected Voice over Internet Protocol Service on a Non-Facilities Basis in California.

Application No. _____

APPLICATION OF DIGITAL AGENT, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY PURSUANT TO PUBLIC UTILITIES CODE SECTION 1001

(PUBLIC)

Howard W. Hunter
President & CEO; Manager, Digital Agent, LLC
2300 Windy Ridge Pkwy SE, Ste R50,
Atlanta, GA 30339-5847
Telephone No.: 678-444-3007
Fax No.: N/A
Email: hhunter@digitalagent.net

Dated: October 29, 2026

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: Digital Agent, LLC

Business Address: 2300 Windy Ridge Pkwy SE, Ste R50, Atlanta, GA 30339-5847

Telephone No.: 678-444-3007

E-mail Address: hhunter@digitalagent.net

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

Same as Above

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

None (Not Applicable)

1.c. Applicant is (check one only)

- ○ Corporation (Inc)
- ○ General Partnership
- ○ Limited Partnership (LP)
- ○ Sole Proprietor
- ◉ Limited Liability Company (LLC)
- ○ Trust
- ○ Other, specify: N/A

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

1.d. FCC Registration No.: 0008257156 **1.e CSOS Entity No.:** B20260457855

1.f. Applicant has a foreign ownership interest

◉ NO ○ YES, Foreign entity interest: N/A

2. APPLICANT REGISTERED AGENT FOR SERVICE OF PROCESS

Agent Name: Registered Agents Inc.

Address: 1401 21st St Ste R, Sacramento, CA 95811

Telephone No.: 307-200-2803

3. APPLICANT LEGAL DOMICILE (check one only)

○ California ◉ Other, specify: Delaware (LLC formed in Delaware on 05/10/2002)

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

Ratesetting	**DATE(s)**	**Other Proposed Schedule**	**DATE(s)**
☑ Prehearing Conference	1/11/27	☐ N/A	N/A
☑ Scoping Memo	1/27/27	☐ N/A	N/A
☐ Testimony (Optional)	N/A	☐ N/A	N/A
☐ Briefing (Optional)	N/A	☐ N/A	N/A
☐ Evidentiary Hearing (Optional) (Attach **Appendix B**)	N/A	☐ N/A	N/A
☑ Proposed Decision	4/29/27	☐ N/A	N/A

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 financial, technical, and any California Environmental Quality Act (CEQA) requirements.

☐ Whether the proposed construction is eligible for the Commission's 21-day expedited process for CEQA review.

☑ Whether the Commission should consider other relevant issues, including other relevant safety issues. Please describe the other issues the Commission should consider:

Applicant has provided fixed interconnected VoIP service, on a non-facilities basis, to two business customers in California without Commission authority: one customer in San Francisco since October 17, 2023, and one in Huntington Beach since October 8, 2024. Applicant self-reports this operation in Appendix D.

☐ To enable the Commission to assess whether granting the CPCN would impact environmental and social justice (ESJ) communities and achievement of the nine goals of the Commission's ESJ Action Plan, please describe any ESJ issues associated with this CPCN. If there are none, please attest that granting this CPCN would not impact ESJ communities or achievement of the ESJ Action Plan.

Applicant attests that granting this CPCN would not impact environmental and social justice (ESJ) communities or achievement of the ESJ Action Plan.

6. APPLICANT WILL OPERATE AS (check all that apply)

☐ Competitive Local Exchange Service Provider

6.a. Proposed Facilities

- ○ Full Facilities-Based
- ○ Limited Facilities-Based
- ○ Non-Facilities-Based/Reseller
- ○ Full Facilities-Based AND Reseller
- ○ Limited Facilities-Based AND Reseller

6.b. Service Territories

- ○ Within ALL the service territories of Uniform Regulatory Framework (URF) Incumbent Local Exchange Carriers (ILECs)
- ○ Within ALL the service territories of the Small Incumbent Local Exchange Carriers (Small ILECs)
- ○ Throughout the State of California (within ALL the service territories of both URF ILECs and Small ILECs)
- ○ In specific portions of the state only (Attach **Appendix C**)

☐ Interexchange (Intra/Inter-LATA) Service Provider throughout the State of California

6.c. Proposed Facilities

- ○ Full Facilities-Based
- ○ Limited Facilities-Based
- ○ Non-Facilities-Based/ Switchless-Reseller
- ○ Full Facilities-Based AND Switchless-Reseller
- ○ Limited Facilities-Based AND Switchless-Reseller

☑ Fixed Interconnected Voice over Internet Protocol (VoIP) Service Provider

6.d. Proposed Facilities

- ○ Full Facilities-Based
- ○ Limited Facilities-Based
- ◉ Non-Facilities-Based

6.e. Service Territories

- ◉ Within ALL the service territories of Uniform Regulatory Framework (URF) Incumbent Local Exchange Carriers (ILECs)
- ○ Within ALL the service territories of the Small Incumbent Local Exchange Carriers (Small ILECs)
- ○ Throughout the State of California (within ALL the service territories of both URF ILECs and Small ILECs)
- ○ In specific portions of the state only (Attach **Appendix C**)

An applicant that *only* selects non-facilities-based for Proposed Facilities (Section 6.b and 6.e.) is not required to respond to Section 11 and 12 of the CPCN Application form.

If applicant selects the Service Territories option, "In specific portions of the state only," 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 public map.

Facilities-based or non-facilities-based Competitive Local Exchange Service Providers and facilities-based Fixed Interconnected VoIP providers seeking to operate in the territories of any Small ILEC are required to meet the requirements contained in Appendices A and B of D.20-08-011. However, these requirements do not apply to non-facilities-based Fixed Interconnected VoIP providers.

7. DATE APPLICANT EXPECTS TO BEGIN OR HAS BEGUN OFFERING SERVICE(S) IN CALIFORNIA (If already providing voice services in California, attach **Appendix D** to provide the reason company began operating in the state prior to obtaining the requisite authority from the Commission)

Date: 10/17/23

NOTE: *For applicants that have not yet started providing voice services in the state, they should provide an estimated date they expect to begin providing services after receiving approval, which factors in at least 9-12 months for the application review and approval process.*

8. APPLICANT WILL PROVIDE THE FOLLOWING SERVICES IN CALIFORNIA
(Check all that apply – applicant must select at least one of the choices below or select multiple)

☑ 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 the applicant offers that may require the Commission to determine jurisdiction)

N/A

Section 8.a Customer Type (check all that apply)

☐ Residential ☑ Business ☐ Other(s) (specify in box below):

N/A

9. SWORN AFFIDAVIT

○ TRUE ◉ NOT TRUE (Attach **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 (Attach **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. Public 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 A of D.26-06-009 as modified by D.26-07-039 that demonstrates the Applicant's financial ability as required above.

13.a. Applicant will not be required to pay deposits to local exchange/interexchange carriers.

◉ TRUE ○ NOT TRUE

Only applicants who will be required to pay deposits to local exchange or interexchange carriers are required to demonstrate that they have a minimum of $25,000 to be used solely for deposits in addition to demonstrating they possess the minimum unencumbered financial requirement amount.

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

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

15. CURRENT/PRIOR OPERATING AUTHORITY LICENSE(S) AND/OR REGISTRATION(S) HELD WITH THE COMMISSION, AND ANY PENDING ACTIVITIES BEFORE THE COMMISSION

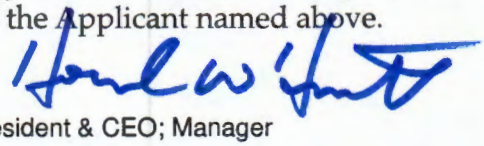
◉ NONE. Applicant confirms that they do not currently hold, nor have they previously held any operating authority license(s) and/or registration(s) with the Commission, and applicant confirms that they do not have any pending activities before the Commission aside from this application proceeding.

○ CURRENT/PRIOR OPERATING AUTHORITY LICENSE(S) AND/OR REGISTRATION(S), AND/OR ANY PENDING ACTIVITIES, specify:

N/A

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, D.24-11-003 and D.26-06-009 as modified by D.26-07-039.

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 Howard W. Hunter

Title President & CEO; Manager Dated 10/29/26

Address 2300 Windy Ridge Pkwy SE, Ste R50, Atlanta, GA 30339-5847

Telephone 678-444-3007

Email Address hhunter@digitalagent.net

Appendices

Appendix A: Organizing documents and qualification to do business in California

#	Document
A-1	**Digital Agent, LLC operating agreement as amended and executed effective 1/1/2017** (Amendment No. 1 to the Amended and Restated LLC Agreement, with signature pages, First Amended Schedule A showing current ownership, and the Class A and Class B assignments; 16 pages)
A-2	CA Certificate of Qualification No. 507830022 (10/14/2026)
A-3	Certified LLC-5, Cert. No. 507829939
A-4	CA Certificate of Status, Cert. No. 510513722 (10/23/2026)
A-5	Delaware Certificate of Good Standing dated 09/16/2026 (Authentication 205136130), included as page 3 of the certified LLC-5 package (A-3)

AMENDMENT NO. 1 TO AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF DIGITAL AGENT, LLC

This AMENDMENT NO. 1 TO AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF DIGITAL AGENT, LLC (this "**Amendment**") is made and effective as of the 1st day of January, 2017 by and among the undersigned.

EXPLANATORY STATEMENT

A. Digital Agent, LLC (the "**Company**") was formed as a limited liability company under and pursuant to the Delaware Limited Liability Company Act and is governed by the Amended and Restated Limited Liability Company Agreement dated November 21, 2011 (the "**Limited Liability Company Agreement**"). All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Limited Liability Company Agreement.

B. Hunter Portsmouth, LLC, Bay Street Management, Inc. and William T. Hunter, Jr. (collectively, the "**Class A Assignors**") were Class A Members of the Company collectively holding a 9% Class A Membership Interest (the "**Class A Interests**").

C. Pursuant to the Assignment of Class A Membership Interests of even date herewith (the "**Class A Assignment**"), Class A Assignors assigned, transferred and conveyed the Class A Interests to Christine F. Hunter 1997 Exempt Trust FBO Howard W. Hunter ("**CFH Trust**"). As a result, Christine F. Hunter 1997 Exempt Trust FBO Howard W. Hunter shall own the 9% Class A Membership Interests.

D. David C. Hunter was a Class B Member (the "**Class B Assignor**") of the Company holding a 20% Class B Membership Interest (the "**Class B Interest**").

E. Pursuant to the Assignment of Class B Membership Interest of even date herewith (the "**Class B Assignment**"), Class B Assignor assigned, transferred and conveyed the Class B Interest to Howard W. Hunter. As a result, Howard W. Hunter shall own the entire Class B Interest.

F. The purpose of this Amendment is to (i) reflect the admission of CFH Trust as a successor 9% Class A Member in the place and stead of Class A Assignor, (ii) reflect the admission of Howard W. Hunter as a successor 20% Class B Member in the place and stead of Class B Assignor, and (iii) acknowledge the additional capital contribution of $600,000 to the Company by Howard W. Hunter.

NOW, THEREFORE, in consideration of the Explanatory Statement, which is hereby made a part hereof, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties hereto intending to be legally bound, hereby agree that the Limited Liability Company Agreement is hereby amended as follows:

1. CFH hereby accepts the Class A Interests and agrees to continue to be bound by the terms of the Limited Liability Company Agreement.

2. Class A Assignors hereby withdraw from the Company as Class A Members thereof. It is intended that CFH Trust shall be substitute Class A Member in the place and stead of Class A Assignors.

3. Howard F. Hunter hereby accepts the Class B Interest and agrees to continue to be bound by the terms of the Limited Liability Company Agreement.

4. Class B Assignor hereby withdraws from the Company as a Class B Member thereof. It is intended that Howard W. Hunter shall be substitute Class B Member in the place and stead of Class B Assignor.

5. **Schedule A** to the Limited Liability Company Agreement is hereby replaced by **First Amended Schedule A** attached hereto. Any reference in the Limited Liability Company Agreement to **Schedule A** shall instead refer to **First Amended Schedule A**.

6. The Limited Liability Company Agreement, as amended hereby, is ratified and affirmed in all respects and shall continue in full force and effect.

7. This Amendment No. 1 to Amended and Restated Limited Liability Company Agreement may be signed in several counterparts and by facsimile, all of which taken together shall constitute one, original instrument. Signatures transmitted via email (as a .pdf file or .tif file) shall be treated as originals for all purposes.

IN WITNESS WHEREOF, the undersigned Members have executed this Amendment as of the date first written above.

[*signatures appear on following Counterpart Signature Pages.*]

AMENDMENT NO. 1 TO
AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF
DIGITAL AGENT, LLC

Counterpart Signature Page

The undersigned, as both Class A Member and Class B Member of Digital Agent, LLC does hereby execute, acknowledge and deliver this Counterpart Signature Page which shall be attached to and made a part of this Amendment.

HOWARD W. HUNTER

AMENDMENT NO. 1 TO
AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF
DIGITAL AGENT, LLC

Counterpart Signature Page

The undersigned withdrawing Class B Member of Digital Agent, LLC does hereby execute, acknowledge and deliver this Counterpart Signature Page which shall be attached to and made a part of this Amendment.

DAVID C. HUNTER

AMENDMENT NO. 1 TO
AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF
DIGITAL AGENT, LLC

Counterpart Signature Page

The undersigned withdrawing Class A Member of Digital Agent, LLC does hereby execute, acknowledge and deliver this Counterpart Signature Page which shall be attached to and made a part of this Amendment.

HUNTER PORTSMOUTH, LLC

Laura B. Covey

By: _____
Name: WM T. HUNTER, JR.
Title: MANAGER

AMENDMENT NO. 1 TO
AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF
DIGITAL AGENT, LLC

Counterpart Signature Page

The undersigned withdrawing Class A Member of Digital Agent, LLC does hereby execute, acknowledge and deliver this Counterpart Signature Page which shall be attached to and made a part of this Amendment.

BAY STREET MANAGEMENT, INC.

Laura B. Corey

By: _____
Name: WM. F. HUNTER, JR.
Title: PRESIDENT

AMENDMENT NO. 1 TO
AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF
DIGITAL AGENT, LLC

Counterpart Signature Page

The undersigned withdrawing Class A Member of Digital Agent, LLC does hereby execute, acknowledge and deliver this Counterpart Signature Page which shall be attached to and made a part of this Amendment.

Laura B. Covey

WILLIAM T. HUNTER, JR.

AMENDMENT NO. 1 TO
AMENDED AND RESTATED LIMITED LIABILITY COMPANY AGREEMENT OF
DIGITAL AGENT, LLC

Counterpart Signature Page

The undersigned Class A Member of Digital Agent, LLC does hereby execute, acknowledge and deliver this Counterpart Signature Page which shall be attached to and made a part of this Amendment.

Christina S. Fisher

RUSSELL W. FISHER, TRUSTEE OF CHRISTINE F. HUNTER 1997 EXEMPT TRUST FBO HOWARD F. HUNTER

FIRST AMENDED SCHEDULE A

TO LIMITED LIABILITY COMPANY AGREEMENT OF DIGITAL AGENT, LLC

(See attached)

DIGITAL AGENT, LLC

First Amended Schedule A

Name	**Membership Interest**
Class A Members	
Howard W. Hunter	89% Class A
Christine F. Hunter 1997 Exempt Trust FBO Howard W. Hunter	11% Class A
Class B Member	
Howard W. Hunter	100% Class B

ASSIGNMENT OF CLASS A MEMBERSHIP INTERESTS

Digital Agent, LLC

This ASSIGNMENT OF CLASS A MEMBERSHIP INTERESTS is made as of the 1st day of January, 2017 by and between HUNTER PORTSMOUTH, LLC ("**Hunter Portsmouth**"), BAY STREET MANAGEMENT, INC. ("**Bay Street**"), and WILLIAM T. HUNTER, JR. ("**WTH**", together with Hunter Portsmouth and Bay Street each an "**Assignor**") and CHRISTINE F. HUNTER 1997 EXEMPT TRUST FBO HOWARD H. HUNTER (the "**Assignee**").

EXPLANATORY STATEMENT

A. Hunter Portsmouth owns a 2% Class A Membership Interest (the "**Hunter Portsmouth Interest**") in Digital Agent, LLC, a Delaware limited liability company (the "**Company**"). Hunter Portsmouth desires to sell, assign, transfer and convey the Hunter Portsmouth Interest to Assignee.

B. Bay Street Management, Inc. owns a 4% Class A Membership Interest (the "**Bay Street Interest**") in the Company. Bay Street desires to sell, assign, transfer and convey the Bay Street Interest to Assignee.

C. WTH owns a 3% Class A Membership Interest (the "**WTH Interest**") in the Company. WTH desires to sell, assign, transfer and convey the WTH Interest to Assignee.

D. The Assignee hereby desires to accept the Hunter Portsmouth Interest, the Bay Street Interest, and the WTH Interest pursuant to the terms hereof.

NOW, THEREFORE, in consideration of the Explanatory Statement, the parties agree with each other as follows:

1. In consideration of the sum of $176,781 to be paid by Assignee to Bay Street no later than December 15, 2017, Bay Street hereby sells, assigns, transfers and conveys the Bay Street Interest to Assignee, free and clear of liens, claims and encumbrances.

2. In consideration of the sum of $84,853 to be paid by Assignee to Hunter Portsmouth no later than December 15, 2017, Hunter Portsmouth hereby sells, assigns, transfers and conveys the Hunter Portsmouth Interest to Assignee, free and clear of liens, claims and encumbrances.

3. In consideration of the sum of $150,262 to be paid by Assignee to WTH no later than December 15, 2017, the receipt and sufficiency of which is hereby acknowledged, WTH hereby sells, assigns, transfers and conveys the WTH Interest to Assignee, free and clear of liens, claims and encumbrances.

4. The Assignee hereby accepts the Hunter Portsmouth Interest, the Bay Street Interest and the WTH Interest.

5. Each Assignor intends that the Assignee shall be a substitute Class A Member in the Company in the place of each respective Assignor.

6. This Assignment and the terms hereof shall inure to the benefit of and be binding upon the parties hereto and their respective heirs, personal representatives, successors and assigns.

[Signatures appear on the following page]

IN WITNESS WHEREOF, the parties have executed this Assignment of Class A Membership Interests as of the date first above written.

WITNESS:

Laura B. Covey

ASSIGNOR:

HUNTER PORTSMOUTH, LLC

By: _____
Name: Wm T. Hunter, Jr
Title: Manager

Laura B. Covey

BAY STREET MANAGEMENT, INC.

By: _____
Name: Wm T. Hunter Jr
Title: President

Laura B. Covey

_____
WILLIAM T. HUNTER, JR.

ASSIGNEE:

Christina S. Fisher

_____
RUSSELL W. FISHER, TRUSTEE OF CHRISTINE F. HUNTER 1997 EXEMPT TRUST FBO HOWARD W. HUNTER

ASSIGNMENT OF CLASS B MEMBERSHIP INTEREST

Digital Agent, LLC

This ASSIGNMENT OF CLASS B MEMBERSHIP INTEREST is made as of the 1st day of January, 2017 by and between DAVID C. HUNTER (the "**Assignor**") and HOWARD H. HUNTER (the "**Assignee**").

EXPLANATORY STATEMENT

A. Assignor owns a 20% Class B Membership Interest (the "**Interest**") in Digital Agent, LLC, a Delaware limited liability company (the "**Company**").

B. Assignor desires to transfer, convey and assign its Interest to the Assignee.

C. The Assignee hereby desires to accept the Interest pursuant to the terms hereof.

NOW, THEREFORE, in consideration of the Explanatory Statement, the parties agree with each other as follows:

1. The Assignor hereby transfers, conveys and assigns to the Assignee the Assignor's entire right, title and interest in and to the Interest in exchange for the sum of One Dollar ($1) to be paid by Assignee to Assignor no later than December 15, 2017.

2. The Assignee hereby accepts the Interest.

3. The Assignor intends that the Assignee shall be a substitute Class B Member in the Company in the place of the Assignor.

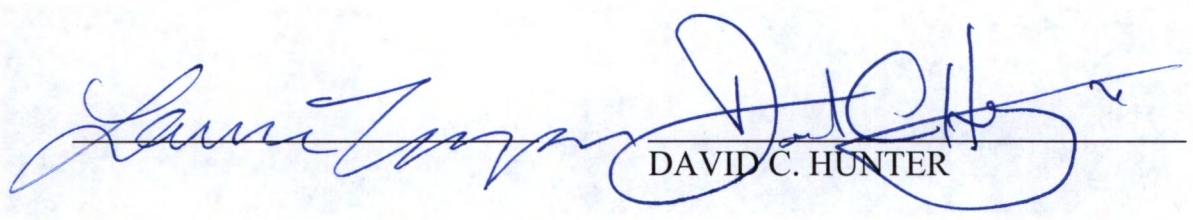
4. This Assignment and the terms hereof shall inure to the benefit of and be binding upon the parties hereto and their respective heirs, personal representatives, successors and assigns.

[Signatures appear on the following page]

IN WITNESS WHEREOF, the parties have executed this Assignment of Class B Membership Interest as of the date first above written.

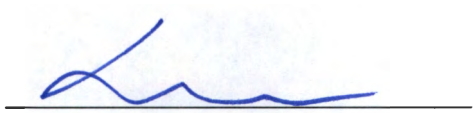
WITNESS:

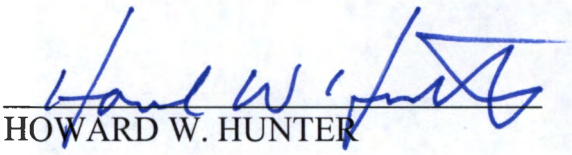
ASSIGNOR:



DAVID C. HUNTER

ASSIGNEE:





HOWARD W. HUNTER

Secretary of State
Certificate of Qualification / Registration

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

Entity Name: DIGITAL AGENT, LLC
Entity No.: B20260457855
Registration Date: 10/12/2026
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 October 14, 2026.

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

Certificate No.: 507830022

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

California Secretary of State

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

Request Type: Certified Copies
Entity Name: DIGITAL AGENT, LLC
Formed In: DELAWARE
Entity No.: B20260457855
Entity Type: Limited Liability Company - Out of State

Issuance Date: 10/14/2026
Copies Requested: 1
Receipt No.: 015111921
Certificate No.: 507829939

Document Listing

Reference #	Date Filed	Filing Description	Number of Pages
B5056-2491	10/12/2026	Initial Filing	3

** **** ****** ******** End of list ******** ****** **** **

I, SHIRLEY N. WEBER, PH.D., California Secretary of State, do hereby certify on the Issuance Date, the attached document(s) referenced above are true and correct copies and were filed in this office on the date(s) indicated above.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California on October 14, 2026.

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

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

B20260457855

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) 657-5448

For Office Use Only

-FILED-

File No.: B20260457855

Date Filed: 10/12/2026

Limited Liability Company Name	
Limited Liability Company Name	DIGITAL AGENT, 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	2300 WINDRY RIDGE PKWY SE R50 ATLANTA, GA 30339
Mailing Address of LLC	
Mailing Address	2300 WINDRY RIDGE PKWY SE R50 ATLANTA, GA 30339
Attention	HOWARD HUNTER
Street Address of California Office of LLC	
Street Address of California Office	1401 21ST STREET SUITE R SACRAMENTO, CA 95811
Agent for Service of Process	
☒ 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)	REGISTERED AGENTS INC Registered Corporate 1505 Agent

Consent to Service of Process

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.

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.

B5056-2491 10/12/2026 6:00 AM Received by California Secretary of State

Certificate Verification No.: 50782939 Date: 10/14/2026

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.

HOWARD HUNTER	*10/12/2026*
Signature	Date

B5056-2492 10/12/2026 6:00 AM Received by California Secretary of State

Certificate Verification No.: 507829939 Date: 10/14/2026

B5056-2494 10/12/2026 6:00 AM Received by California Secretary of State

Delaware

The First State

I, CHARUNI PATIBANDA-SANCHEZ, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "DIGITAL AGENT, 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 SIXTEENTH DAY OF SEPTEMBER, A.D. 2026.

C. P. Sanchez

Charuni Patibanda-Sanchez, Secretary of State

3524158 8300

SR# 20264072452

Authentication: 205136130

Date: 09-16-26

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

Certificate Verification No.: 507829939 Date: 10/14/2026

Secretary of State
Certificate of Status

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

Entity Name:	DIGITAL AGENT, LLC
Entity No.:	B20260457855
Registration Date:	10/12/2026
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 October 23, 2026.

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

Certificate No.: 510513722

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

Appendix B: Evidentiary hearing

- Not Applicable.

Appendix C: Specific portions of the state

- Not Applicable (URF ILEC territories selected).

Appendix D: Statement Regarding Provision of Service Prior to Obtaining Authority

Digital Agent, LLC ("Digital Agent") is a Georgia-based managed IT services provider. It discloses that it has provided fixed interconnected VoIP service in California, on a non-facilities basis, without first obtaining authority from the Commission, as follows:

1. Customers and service. Digital Agent has two California business customers, and no residential customers:

	Customer A	**Customer B**
Location	San Francisco, CA	Huntington Beach, CA
Service start	October 17, 2023	October 8, 2024
Service	18 hosted VoIP seats	129 hosted VoIP seats at start, now 137
California numbers	—	57
Recurring price	$441.00/month (18 seats at $22.00, plus a $45.00 feature package)	$2,155.00/month (137 seats at $15.00, plus a $100.00 feature package)
Status	Ongoing	Ongoing

Customer names and service addresses are omitted from this public filing to protect customer privacy and will be provided to the Communications Division confidentially on request.

2. Revenue. From October 2023 through October 2026, Digital Agent billed approximately **$16,089.38** for hosted VoIP seats and the monthly feature package to Customer A (37 monthly bills). From October 2024 through October 2026, it billed approximately **$52,278.91** for hosted VoIP seats and the monthly feature package to Customer B (25 monthly bills).

3. Reason for operating without authority.

Digital Agent is a small company. It has 23 employees serving approximately 250 business customers, nearly all of them outside California. It began providing hosted voice service in California by adding seats for two existing IT clients with California offices. It understood that its underlying carrier's certification and its tax engine covered California regulatory obligations, and it did not realize that Commission licensing applied to it as a non-facilities-based provider, or that D.24-11-003 (November 2024) had set a 180-day deadline.

Digital Agent states the following as the constraint it operated under, not as an excuse; the requirement applied to it regardless of its size. Until recently, a company of 23 people could not realistically track and meet the licensing, reporting and surcharge rules of every state where a customer has an office. Doing that work by hand would have taken more staff time than setting up and supporting the customers themselves.

What has changed is that AI tools now make this compliance work practical at Digital Agent's size. Digital Agent now uses AI tools to review its billing records by state, identify the regulatory

requirements that apply, prepare filings and track deadlines. That review is how Digital Agent found the second California customer. Digital Agent learned of the requirement on July 16, 2026, from a notice its VoIP platform provider, Sangoma, sent to its customers, and began work on it the next day. Digital Agent obtained a $25,000 performance bond (effective July 20, 2026). It then registered with the California Secretary of State (October 2026), contacted Commission staff on October 20, 2026, and filed this application at staff's direction. The same tools will support its ongoing reporting and remittance obligations once authority is granted.

4. Correction of prior statement. In its October 20, 2026 email to Commission staff, Digital Agent described "one California customer… about $471 per month." A full review of its billing records found a second California customer and higher revenue. Digital Agent sent Commission staff a written correction on October 21, 2026, and this Appendix supersedes that description. (Rule 1.1)

5. Commitments. Digital Agent commits to:

- (a) submit its monthly California line counts and intrastate revenue for the whole period of unauthorized operation, within 30 days of the decision or as directed;
- (b) obtain a Utility ID, register in TUFFS, and report and remit going forward;
- (c) continue serving its existing customers pending the decision, unless the Commission directs otherwise;
- (d) add no new California customers until authority is granted.

Digital Agent did not intend to evade Commission requirements.

Appendix E: Affidavit exceptions

- **Item (g):** Digital Agent provided VoIP service in California without Commission authority. This has not been adjudicated, and it is disclosed in full in Appendix D.

Appendix F: Affiliated entities

- Applicant has no affiliated entities.

Appendix G: Officers, directors, 10%+ owners and resumes

The form requires 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," plus resumes listing all employment.

Name	Title / interest	Street address
Howard W. Hunter	President & CEO; Manager. **Sole officer, director and manager, and sole controlling person.** 89% Class A and 100% Class B Membership Interest	2300 Windy Ridge Pkwy SE, Ste R50, Atlanta, GA 30339
Christine F. Hunter 1997 Exempt Trust FBO Howard W. Hunter	Owner, **11% Class A** Membership Interest	PO Box 472, Lake Forest, IL 60045

- **Control:** No other person controls Digital Agent, LLC, directly or indirectly. Howard W. Hunter is its sole officer, director and manager.

Resume: Howard W. Hunter

Howard W. Hunter
2300 Windy Ridge Pkwy SE, Atlanta, GA 30339 · hhunter@digitalagent.net · 404-446-3106

President & CEO, Digital Agent, LLC (Atlanta, GA), 2002–present

- Leads Digital Agent as its sole officer, director, manager and controlling owner.
- Runs all operations, finance, regulatory compliance and customer relationships for a business telecom and managed IT provider.
- In 2000, managed DA's certification as a competitive local exchange carrier (CLEC) in Georgia. DA held CLEC status until 2020, when it wound down its facilities-based TDM operations and became a VoIP-only provider.
- Oversees DA's hosted voice (VoIP) services: cloud seats, phone numbers and calling through wholesale carrier partners.
- Manages DA's vendor and carrier relationships.
- Leads a team of 23 employees serving approximately 250 enterprise customers.

Appendix H: Investigations

- Not Applicable (§10.a TRUE).

Appendix I: Construction

- Not Applicable (non-facilities-based).

Appendix J: CEQA / PEA

- Not Applicable (no construction; D.24-11-003 at 56–58).

Appendix K: Financial instrument (CONFIDENTIAL)

- Bank statement demonstrating at least $25,000, reasonably liquid (D.26-06-009 App. A, as modified by D.26-07-039).
- Every page is marked "Protected from public disclosure pursuant to Decision 24-11-003."
- Filed with the signed Statement of Confidentiality.

Appendix L: Draft tariff

- Not Applicable (§14 TRUE).

Appendix M: Supplemental information for Sections 4, 6, 13.a, 14 and 16

The fillable form has no space for the following details from Applicant's responses, so they are provided here.

Section 4, Proposed schedule. The form's date fields accept a single date. Applicant's proposed timeframes are:

- Prehearing Conference: January 11, 2027 (~75 days after filing), or sooner, or "if needed".

- Scoping Memo: January 27, 2027 (~90 days after filing), or sooner.
- Testimony, Briefing and Evidentiary Hearing (optional): not selected, so Appendix B is Not Applicable.
- Proposed Decision: April 29 – July 29, 2027 (~6–9 months after filing), or sooner.

Note: The proposed timeframes are based on the schedules of recent comparable CPCN applications (for example, IPC Systems, A.25-09-002). Applicant has no objection to an expedited schedule and requests that the proceeding move forward as quickly as the Commission's calendar allows.

Section 6.d, Proposed facilities. Non-Facilities-Based. DA owns or controls no local exchange network facilities, and comes under a Bandwidth reseller agreement.

Section 13.a, Deposits. Applicant will not be required to pay deposits. DA pays no deposits to local exchange carriers or interexchange carriers, so the additional $25,000 for deposits does not apply.

Section 14, Exemption from tariffing. DA offers no basic service (D.12-12-038) and will comply with the D.98-08-031 consumer protection rules. R2D10 was granted detariffed status on this basis. Appendix L is Not Applicable.

Section 16, Performance bond. Old Republic Surety Bond **A150023859**, $25,000, continuous, effective 7/20/2026. It is filed by Tier 1 advice letter within 30 days of approval.

ATTACHMENT A

SWORN AFFIDAVIT

Name of Applicant/Company: Digital Agent, LLC

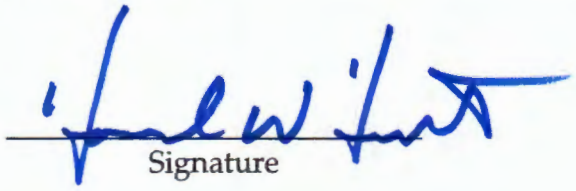
My name is Howard W. Hunter. I am President & CEO and Manager of Digital Agent, LLC (Applicant). My personal knowledge of the facts stated herein has been derived from my employment with Digital Agent, LLC (Applicant).

I affirm that Digital Agent, 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.



Signature

Howard W. Hunter, President & CEO and Manager
Name and Title

Dated: October 29, 2026