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May 19, 2015

Mary Jo Kunkle, Executive Secretary  
Michigan Public Service Commission  
7109 W. Saginaw Hwy.  
Lansing, MI 48917

RE: MPSC Case No. U-17859 – Revised Application and Testimony

Dear Ms. Kunkle:

Enclosed for filing in the above-referenced matter, please find the ***Revised Application Of Neo Network Development, Inc. For Temporary And Permanent Licenses To Provide Basic Local Exchange Service In The State Of Michigan, Revised Pre-Filed Testimony of Vince Aragona and Exhibits.***

If you have any questions or concerns with the enclosed, please do not hesitate to contact me.

Very truly yours,

**Fraser Trebilcock Davis & Dunlap, P.C.**



Michael S. Ashton

MSA/ab  
Enclosures

**STATE OF MICHIGAN**

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

**In the matter of the application of )  
Neo Network Development, Inc. for temporary )  
and permanent licenses to provide )  
basic local exchange service throughout the )  
State of Michigan in the zone and exchange )  
areas served by AT&T Michigan, )  
Frontier North, Inc., Frontier Midstates, Inc., ) Case No. U-17859  
CenturyTel of Michigan, Inc., )  
CenturyTel Midwest – Michigan, Inc., )  
CenturyTel of Northern Michigan, Inc., and )  
CenturyTel of Upper Michigan, Inc. )**

**REVISED APPLICATION OF NEO NETWORK DEVELOPMENT, INC. FOR  
TEMPORARY AND PERMANENT LICENSES TO PROVIDE BASIC LOCAL  
EXCHANGE SERVICE IN THE STATE OF MICHIGAN**

Neo Network Development, Inc. (“Neo Network” or “Applicant”), by and through its Regulatory Counsel, Anita Taff-Rice, and local counsel Michael S. Ashton of Fraser Trebilcock Davis & Dunlap, PC, pursuant to Sections 301(1), 301(2) and 302(1) of the Michigan Telecommunications Act (“MTA”), 1991 PA 179, as amended, MCL 484.2101 et seq.; hereby applies to the Michigan Public Service Commission (“Commission”) for a temporary and, ultimately, a permanent license to provide basic local exchange service in the incumbent geographic territories of AT&T Michigan; Frontier North, Inc.; Frontier Midstates, Inc.; CenturyTel of Michigan, Inc.; CenturyTel Midwest – Michigan, Inc.; CenturyTel of Northern Michigan, Inc.; and CenturyTel of Upper Michigan, Inc. in the state of Michigan. Neo Network proposes to provide basic local exchange service, as well as provide non-licensed and unregulated telecommunications services on a competitive basis.

The Commission has determined that the public interest would be served by ensuring competition in the local exchange, intraLATA toll and interLATA markets. Neo Network proposes to compete with the incumbent LECs, other competitive local carriers, and providers of long distance services by providing high quality, fairly-priced, innovative telecommunications services. Neo Network's entry into the market will make efficient use of existing communications resources and increase diversification and reliability in the supply of communications services. Further, its services will aid the expansion of the telecommunications industry in Michigan.

Approval of this Application will further the purposes of the MTA, as well as the Federal Telecommunications Act of 1996 ("Act"). Therefore, Neo Network respectfully asks that the Commission grant it a permanent license after hearing. Neo Network further requests the granting of a temporary license to provide basic local exchange service throughout the State of Michigan in the zone and exchange areas in which Frontier North Inc., Frontier Midstates, Inc., CenturyTel of Michigan, Inc., CenturyTel Midwest – Michigan, Inc., CenturyTel of Northern Michigan, Inc., CenturyTel of Upper Michigan, Inc., and AT&T Michigan are the incumbent local exchange carriers pursuant to Section 301(2) of the MTA. Section 301(2) states, "pending the determination of an application for a license the Commission without notice and hearing may issue a temporary license for a period not to exceed one year." Granting Neo Network a temporary license will allow it to promptly begin the negotiation of interconnection arrangements with the incumbent carriers, which are a necessary prerequisite to Neo Network's commencement of service in Michigan. Neo Network will provide basic local exchange service under the temporary license in accordance with the regulatory requirements specified in the

MTA. Neo Network will submit a final tariff reflecting the services that it will offer and identifying the specific zone and exchanges in which it will offer service. .

In support thereof, Neo Network provides the following information:

**I. Name and Address of Applicant:**

Neo Network Development, Inc.  
184 Shuman Blvd., Suite 575  
Naperville, IL 60563  
Phone: 888-636-6380 (888-NEONET-0);  
Fax: 312-275-7352  
[www.neonetworkdevelopment.com](http://www.neonetworkdevelopment.com)

Correspondence concerning this Application should be directed to local counsel for Neo

Network with a copy to Neo Network's Regulatory Counsel:

Local Counsel:

Michael S. Ashton  
Fraser Trebilcock Davis & Dunlap, PC  
124 W. Allegan, Suite 1000  
Lansing, MI 48933  
Phone: 517-377-0875  
[mashton@fraserlawfirm.com](mailto:mashton@fraserlawfirm.com)

Attorney:

Anita Taff-Rice  
iCommLaw  
1547 Palos Verdes, #298  
Walnut Creek, CA 94597  
415-699-7885  
925-274-0988 (F)  
[anita@icommlaw.com](mailto:anita@icommlaw.com)

**Customer Complaints**

Applicant has established a toll free number for customers to use for any issues, including complaints. The toll free number is **888-636-6380 (888-NEONET-0)**.

## **II. Neo Network Fully Meets the Requirement of Section 302(1) of the MTA for a License to Provide Basic Local Exchange Service**

Section 302(1) of the MTA (MCL 484.2302(1)) provides that, after notice and hearing, the Commission shall approve an application for a license if it finds that: a) the applicant possesses sufficient technical, financial, and managerial resources and abilities to provide basic local exchange service within the geographic area of the license and that the applicant intends to provide service within 1 year from the date the license is granted, and b) the granting of a license to the applicant would not be contrary to the public interest. As explained in further detail below, Neo Network fully meets the requirements of Section 302(1). In addition, as required by Section 203(7) of the MTA, Neo Network is filing the testimony of Vince Aragona, an employee knowledgeable with the operations of Neo Network, as well as several exhibits in support of this Application. Upon issuance of a license, and the completion of negotiations with the incumbent carriers, Neo Network will promptly file, and electronically post to the Internet, a tariff that complies with all Commission rules and regulations and lists the rates, terms and conditions of service.

### **a. Description or Identification of Geographic Area for which License is Sought**

Neo Network will serve the zones and exchanges as mapped and described by Michigan's incumbent local exchange carriers, particularly AT&T Michigan; Frontier North Inc.; Frontier Midstates, Inc.; CenturyTel of Michigan, Inc.; CenturyTel Midwest – Michigan, Inc.; CenturyTel of Northern Michigan, Inc.; and CenturyTel of Upper Michigan, Inc. (known collectively as "incumbent carriers" or "ILECs"). The local calling area will be the same, if not greater than the ILECs' existing local calling areas. This means that Neo Network's customers will have at least the same, or larger, local calling area as if they remained customers of the ILECs. Neo Network intends to mirror the map and legal description section of the tariffs and/or

service guides filed by ILECs for the zones and exchanges it proposes to serve. Neo Network understands that any future modification to these zone and exchange boundaries or legal descriptions of these boundaries will be automatically mirrored by Neo Network on a going forward basis. If not mirrored, new detailed maps and legal descriptions, on an individual exchange basis, will be filed with the Commission for approval.

**b. Description of Neo Network's general financial, technical and managerial resources:**

Neo Network has more than sufficient financial, technical and managerial resources. As demonstrated below, Neo Network possesses enough capital to allow it to consistently provide the services proposed at a high level.

Neo Network, Inc. was incorporated on June 13, 2013 in Delaware and is authorized to transact business in the State of Michigan. A copy of Neo Network's Certification from the State of Delaware and the Certificate to Transact Business in Michigan are attached as Exhibit 1 to the pre-filed testimony. A list of the officers of Neo Network, Inc. is provided in Exhibit 2 to the pre-filed testimony. All officers and directors may be contacted at the corporate headquarters address at 184 Shuman Blvd., Suite 575, Naperville, IL 60563.

Neo Network has not yet received certifications to operate as a competitive local exchange carrier in any other state but anticipates seeking certification in other states during this year. Neo Network is also seeking a license in Illinois, but Neo Network is seeking a license in Michigan first because business opportunities arose in Michigan before they did in Illinois.

Applicant's management team looks forward to using their managerial and technical experience to bring Neo Network's services to Michigan. Neo Network submits that their financial status and substantial experience and expertise demonstrated by these individuals

ensures that it is fully capable of carrying out its proposal to bring new and economically priced telecommunications options to Michigan's marketplace.

As a private company, Neo Network confidentially files its financial information contained in Exhibit 3 to the pre-filed testimony under seal.

i. **Financial:**

Neo Network has the financial resources necessary to carry out its responsibilities as a provider of the telecommunications services described in this Application. Please see Exhibit 3 for complete documentation of Neo Network's financial qualifications.

ii. **Technical and Managerial:**

Please find Exhibit 4 of the pre-filed testimony documenting of Neo Network's significant technical and managerial resources provided via biographical resumes of management.

iii. **Corporate Structure**

Neo Network is a corporation organized in the State of Delaware. A copy of Neo Network's Articles of Organization and Restated Articles is attached as Exhibit 1.

**III. Demonstration of Applicant's Intent to Provide Service within One Year From the Date the License is granted**

As demonstrated in Mr. Aragona's testimony, Neo Network intends to offer service within one year of the date a license is granted by the Commission. As Mr. Aragona notes, prior to the provision of service in Michigan, several important developments must occur. Among these developments are, the issuance of a license by the Michigan Public Service Commission and the completion and filing of a final tariff with the Commission for Neo Network's regulated basic local exchange services. Each of these activities may be subject to delay and difficulties beyond the control of Neo Network. It is Neo Network's intention to offer local exchange service in Michigan within one year from the date the license is granted. Neo Network is also

seeking CLEC status so that it will have flexibility to meet a variety of customer requirements without the need to later seek additional authority.

**a. Description of Services**

Neo Network seeks a license to provide basic local exchange service, throughout all AT&T Michigan; Frontier North Inc.; Frontier Midstates, Inc.; CenturyTel of Michigan, Inc.; CenturyTel Midwest – Michigan, Inc.; CenturyTel of Northern Michigan, Inc.; and CenturyTel of Upper Michigan, Inc. incumbent service territories. For the purposes of the application, Neo Network is submitting a draft tariff that is consistent with the illustrative tariff of the Commission Staff, but which includes rates, terms and conditions unique to Neo Networks’ business plan. Please note that, with respect to the illustrative local exchange tariff, certain details of Neo Network’ provision of local exchange services, including the rates to be charged to customers, may be dependent upon the negotiation of agreements with the Incumbent or other carriers for facilities or services or with customers on an individual case basis. Upon issuance of a license, and the completion of negotiations with such carriers, Neo Network will promptly file and electronically post a tariff with the Commission that complies with all Commission rules and regulations and lists the rates, terms and conditions of service.

Neo Network will implement the procedures necessary to prevent any unfair marketing practices. Neo Network will comply with the applicable intraLATA access requirements of incumbent local exchange telephone companies, and with all other applicable Commission rules, regulations and standards.

**b. Public Interest Impact**

Both the Michigan Legislature and the United States Congress have determined that it is in the public interest to promote competition in the provision of telecommunications services. As

discussed above, the Federal Act was designed to promote increased competition in the telecommunications market. Moreover, the Commission has already determined that the granting of applications for competing licenses to provide basic local exchange services is in the public interest. Enhanced competition in telecommunications services likely will further stimulate economic development in Michigan.

#### **IV. Conclusion**

Neo Network has demonstrated that it possesses sufficient technical, financial and managerial resources and abilities to provide basic local exchange service in the areas requested. Neo Network has also demonstrated that granting the license will not adversely affect the public interest.

WHEREFORE, Neo Network, Inc., respectfully requests that the Commission enter an order which:

- (1) grants Neo Network Development, Inc., a temporary license to provide basic local exchange services in the zone and exchange areas throughout the state of Michigan in the incumbent local exchange territories of AT&T Michigan; Frontier North Inc.; Frontier Midstates, Inc.; CenturyTel of Michigan, Inc.; CenturyTel Midwest – Michigan, Inc.; CenturyTel of Northern Michigan, Inc.; and CenturyTel of Upper Michigan, Inc. and,
- (2) grants Neo Network Development, Inc., a permanent license to provide basic local exchange services in the zone and exchange areas throughout the incumbent local exchange territories of AT&T Michigan; Frontier North Inc.; Frontier Midstates, Inc.; CenturyTel of Michigan, Inc.; CenturyTel Midwest – Michigan, Inc.; CenturyTel of Northern Michigan, Inc.; and CenturyTel of Upper Michigan, Inc., pursuant to Section 302(1) of the Michigan Telecommunications Act, MCL 484.2302(1) and;
- (3) grants such additional or further relief as may be necessary or appropriate.

Respectfully submitted,

By:  \_\_\_\_\_

Michael S. Ashton  
Fraser Trebilcock Davis & Dunlap, PC  
124 W. Allegan, Suite 1000  
Lansing, MI 48933  
Phone: 517-377-0875  
[mashton@fraserlawfirm.com](mailto:mashton@fraserlawfirm.com)

Attorneys for Neo Network Development, Inc.

Date: May 19, 2015

**BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

**In the matter of the application of** )  
**Neo Network, Inc. for temporary** )  
**and permanent licenses to provide** )  
**basic local exchange service throughout the** )  
**State of Michigan in the zone and exchange** )  
**areas served by AT&T Michigan,** )  
**Frontier North, Inc., Frontier Midstates, Inc.,** ) **Case No. U-17859**  
**CenturyTel of Michigan, Inc.,** )  
**CenturyTel Midwest – Michigan, Inc.,** )  
**CenturyTel of Northern Michigan, Inc., and** )  
**CenturyTel of Upper Michigan, Inc.** )

**REVISED PREFILED TESTIMONY OF VINCE ARAGONA**  
**ON BEHALF OF NEO NETWORK, INC.**

1 **Q: PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS FOR**  
2 **THE RECORD.**

3 A: My name is Vince Aragona and I am the CEO of Neo Network Development, Inc.  
4 (“Neo Network” or “Applicant”). The company’s address is 184 Shuman Blvd., Suite  
5 575, Naperville, IL 60563.

6 **Q: WHAT ARE YOUR CURRENT JOB RESPONSIBILITIES?**

7 A: In my capacity as CEO, I am responsible for many operations of the company.  
8 This includes all aspects of its operations activities, budgets, invoice verification, billing,  
9 compliance with various rules and regulations and purchasing.

10 **Q: PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND**  
11 **AND EXPERIENCE.**

12 A: I have 25 years’ managerial experience in the telecommunications industry. I have  
13 served National Director of Network Implementation and Operations, Vice President of  
14 Network Engineering and Implementation (US) and most recently, Vice President of

1 Network Planning and Development (North America) for ExteNet Systems from 2004  
2 through 2013.

3 From 2001 to 2004, I was Senior Director of Network Implementation and Operations for  
4 NextG Networks Inc., a similarly situated start up that was recently acquired by Crown  
5 Castle Inc.

6 From 2000 to 2001, I was recruited as Area Director of Network Operations and  
7 Construction for Metricom Inc.(A\K\A Ricochet Wireless) responsible for the acquisition  
8 of 130 privately negotiated (Non-regulated) municipal franchise agreements, deployment  
9 of over 20,000 micro cells and the greenfield acquisition, development, construction and  
10 operation of over 350 macro sites in a micro / macro mesh network architecture  
11 throughout the Southwestern United States.

12 From 1994 to 2000, I held several positions with Paging Network Inc. (A\K\A PageNet)  
13 including Regional Director of Field Operations (Pacific Region), Regional PCS  
14 Manager & Regional Project Director (Atlantic Region) and Systems Manager.

15 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

16 A: The purpose of my testimony is to support the Application for temporary and  
17 permanent licenses to provide basic and local exchange services in the State of Michigan.

18 **Q: ARE YOU FAMILIAR WITH THE APPLICATION FILED ON YOUR  
19 COMPANY'S BEHALF AT THIS COMMISSION?**

20 A: Yes.

21 **Q: DO YOU RATIFY AND CONFIRM THE STATEMENTS MADE IN THAT  
22 APPLICATION AND ALL RELATED FILINGS?**

23 A: Yes.

1 **Q: PLEASE DESCRIBE Neo Network AND ITS CURRENT OPERATIONS.**

2 A: Neo Network Development, Inc. is a Delaware corporation and is authorized to do  
3 business in Michigan. See, Exhibit 1. The Company's regulated activities include the  
4 construction of new fiber optic Facilities, independent of or interconnected with existing  
5 Carrier's fiber capable of supporting the Company's managed network services. These  
6 managed services include, but are not limited to the interconnection, transport and  
7 backhaul of Internet Protocol (IP) Ethernet and related transmission protocols over a fiber  
8 optic media. In addition to our managed services, the Company intends to offer lit, dim  
9 and dark fiber services on a wholesale and retail basis.

10 **Q: HAS NEO NETWORK IN THE PAST, OR IS IT CURRENTLY,**  
11 **PROVIDING ANY TELECOMMUNICATIONS SERVICES IN MICHIGAN?**

12 A: No.

13 **Q: PLEASE DESCRIBE THE MANAGERIAL ABILITIES OF THE**  
14 **APPLICANT.**

15 A: Applicant has a team of managers and support personnel qualified to operate a  
16 communications business. Exhibit 2 provides a list of officers and Exhibit 4 is a detailed  
17 set of biographies setting forth the team's qualifications. The management team has many  
18 years of relevant experience in telecommunications.

19 **Q: PLEASE DESCRIBE THE APPLICANT'S FINANCIAL ABILITY TO**  
20 **PROVIDE SERVICE.**

21 A: Neo Network is financially qualified to operate as a provider of  
22 telecommunications services in Michigan. The proposed initiation of services in  
23 Michigan will be funded by Neo Network.

1 Neo Network's financial statements (including balance sheets and income  
2 statements) are provided in Confidential Exhibit 3. This information demonstrates that  
3 Neo Network has sufficient financial resources to fund operations fully. Neo Network  
4 requests confidential treatment of its financial information. Neo Network is a privately-  
5 held company and therefore its financial information is not publicly available. Neo  
6 Network takes all reasonable steps to protect the privacy of its financial information. In  
7 situations where Neo Network must provide its financial information to other public  
8 utilities commissions or governmental entities, it does so under seal and requests  
9 confidential treatment. Therefore, Neo Network submits its Confidential Financial  
10 Statements under seal and includes a sworn affidavit verifying that Neo Network's  
11 financial information qualifies for confidential treatment in accordance with the  
12 Commission's rules. The supporting affidavit is included as part of Confidential  
13 Exhibit 3.

14 **Q: DOES APPLICANT CURRENTLY PROVIDE TELECOMMUNICATIONS**  
15 **SERVICE IN ANY OTHER STATES OR HAVE APPLICATIONS PENDING?**

16 A: Neo Network provides non-regulated telecommunications services in other states,  
17 but does not provide regulated telecommunications services in any states. Neo Network  
18 does have an application pending in Minnesota. Neo Network is also seeking a license in  
19 Illinois, but Neo Network is seeking a license in Michigan first because business  
20 opportunities arose in Michigan before they did in Illinois.

21 **Q: HAS APPLICANT OR ANY AFFILIATED ENTITY EVER BEEN**  
22 **SUBJECT TO ANY FINES FOR SLAMMING OR OTHER CUSTOMER-**  
23 **RELATED COMPLAINTS?**

1 A: No.

2 **Q: HAS APPLICANT OR ANY OF ITS AFFILIATES EVER BEEN SUBJECT**  
3 **TO ANY FEDERAL OR STATE INVESTIGATION REGARDING ITS**  
4 **SERVICES?**

5 A: There are no pending or completed criminal, civil, or administrative actions taken  
6 against Neo Network by a state or federal authority, including any settlements, in  
7 connection with the provision of telephone services or telecommunications services.

8 **Q: PLEASE DESCRIBE THE SERVICES APPLICANT INTENDS TO**  
9 **PROVIDE IN MICHIGAN.**

10 A: Applicant will be providing local exchange, intraLATA toll, and interLATA  
11 interexchange services in Michigan. Neo Network is also seeking CLEC status so that it  
12 will have flexibility to meet a variety of customer requirements without the need to later  
13 seek additional authority.

14 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

15 A: Yes.

# EXHIBIT 1

***MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS***  
***FILING ENDORSEMENT***

***This is to Certify that the APPLICATION FOR CERTIFICATE OF AUTHORITY***

***for***

***NEO NETWORK DEVELOPMENT, INC.***

***ID NUMBER: 60845X***

***received by facsimile transmission on March 13, 2015 is hereby endorsed.***

***Filed on March 13, 2015 by the Administrator.***

***This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.***



***In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 13th day of March, 2015.***

***Sent by Facsimile Transmission***

***Alan J. Schefke, Director***  
***Corporations, Securities & Commercial Licensing Bureau***

CSCL/CD-560 (Rev. 01/14)

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU										
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City	State	ZIP Code								
EFFECTIVE DATE:										

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**APPLICATION FOR CERTIFICATE OF AUTHORITY  
TO TRANSACT BUSINESS OR CONDUCT AFFAIRS IN MICHIGAN**

**For use by Foreign Corporations**

(Please read information and instructions on the last page)

*Pursuant to the provisions of Act 284, Public Acts of 1972 (profit corporations), or Act 162, Public Acts of 1982 (nonprofit corporations), the undersigned execute the following Application:*

1. The name of the corporation is: Neo Network Development, Inc.
---

2. (Complete this item only if the corporate name in item 1 is not available for use in Michigan.) The assumed name of the corporation to be used in all its dealings with the Bureau and in the transaction of its business or conducting of its affairs in Michigan is:
--

3. It is incorporated under the laws of <u>the State of Delaware</u> . The date of its incorporation is <u>June 13, 2013</u> , and the term of existence if other than perpetual is <u>N/A</u> .
--

4. a. The address of the main business or headquarters office of the corporation is: <u>184 Shuman Blvd., Suite 575</u> <u>Naperville</u> <u>IL</u> <u>60563</u> (Street Address) (City) (State) (ZIP Code)
b. The mailing address if different than above:  (Street Address) (City) (State) (ZIP Code)

5. The street address of its registered office in Michigan is:

30600 Telegraph Road, Suite 2345 Bingham Farms, Michigan 48025-5720  
(Street Address) (City) (ZIP Code)

The mailing address of the registered office in Michigan if different than above:

\_\_\_\_\_, Michigan \_\_\_\_\_  
(Street Address or P.O. Box) (City) (ZIP Code)

The name of the resident agent at the registered office is: The Corporation Company

The resident agent is an agent of the corporation upon whom process against the corporation may be served.

6. The specific business or affairs which the corporation is to transact or conduct in Michigan is as follows:

Wireless and Wireline Telecommunications service and related activities.

The corporation is authorized to transact such business in the jurisdiction of its incorporation.

7. (To be completed by profit corporations only)

The total authorized shares of the corporation are: 7,000,000

8. If the applicant is a trust please specify any powers or privileges possessed by the trust that are not possessed by an individual or a partnership.

Signed this 12<sup>th</sup> day of March, 2015

By   
(Signature of Authorized Officer or Agent)

Vince Aragona  
(Type of Print Name)

# Delaware

PAGE 1

## *The First State*

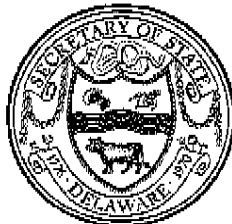
I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "NEO NETWORK DEVELOPMENT, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWELFTH DAY OF MARCH, A.D. 2015.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

5350658 8300

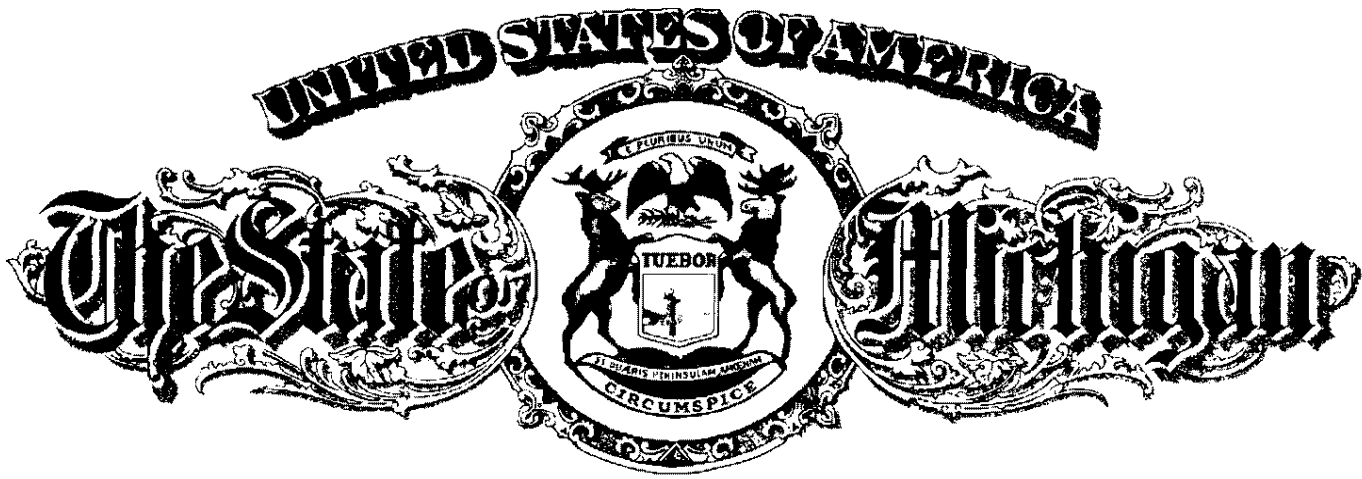
150350718



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

  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 2195320

DATE: 03-12-15



Department of Licensing and Regulatory Affairs

Lansing, Michigan

*This is to Certify That*

**NEO NETWORK DEVELOPMENT, INC.**

*a corporation existing under the laws of the State of DELAWARE was validly authorized to transact business in Michigan on the 13th day of March, 2015, in conformity with 1972 PA 284, as amended.*

*Said corporation is authorized to transact in this state any business of the character set forth in its application which a domestic corporation formed under this act may lawfully conduct. The authority shall continue as long as said corporation retains its authority to transact such business in the jurisdiction of its incorporation and its authority to transact business in this state has not been surrendered, suspended or revoked.*

*This certificate is in due form, made by me as the proper officer, and is entitled to have full faith and credit given it in every court and office within the United States.*



Sent by Facsimile Transmission  
60845X

*In testimony whereof, I have hereunto set my hand, in the City of Lansing, this 13th day of March, 2015.*

Alan J. Schefke, Director  
Corporations, Securities & Commercial Licensing Bureau

# EXHIBIT 2

Exhibit 2

KEY OFFICERS

**Vince Aragona** -- Founder and Chief Executive Officer

**Michael Underdown** - - Chief Operating Officer

**Laurance Lewis** - - Executive Vice President and General Counsel

U-17859  
Revised Exhibit 3  
Revised Pre-Testimony of Vince Aragona

**CONFIDENTIAL**

**EXHIBIT 3 – FILED UNDER SEAL**

# EXHIBIT 4

**Vince Aragona** is the Founder and Chief Executive Officer of Neo Network Development. He is a wireless and telecommunications industry veteran and pioneer in Distributed Antenna System and Small Cell Network deployment and operations. With over 30 years experience in wireless and fiber optic network engineering, implementation, operations, regulatory affairs, backhaul and fiber network architecture and economics, supply chain, project and program management, Vince is widely considered to be one of the leading subject matter experts in the fields of outdoor distributed antenna systems (DAS) and small cell based networks.

Previous to Neo Network Development, Vince held various positions, including National Director of Network Implementation and Operations, Vice President of Network Engineering and Implementation (US) and most recently, Vice President of Network Planning and Development (North America).

Functionally, Vince was responsible for Network Engineering, Process Engineering, Network Design Tool and Software Development, Outside Plant and Fiber Network Architecture, Dark Fiber Agreement Acquisitions, Cost Estimating, Pricing Strategy, Hardware Engineering, ILEC and Electric Utility Agreement Acquisitions, Pre-litigation Mediation and Dispute Resolution and led the Services Qualification and Supply Chain Contracting Program, RFP Response and Customer Proposal Development.

He began his career as a Ground Radio Electronics Communications Technician in the US Air Force from 1982 to 1986.

## **Michael Underdown – Chief Operating Officer**

Michael Underdown has over 20 years of experience in the telecommunications management, covering virtually all aspects and responsibilities for business development, engineering, sales, and operations. He has represented major industry leaders in top management positions, (TCG-AT&T, Adelphia). Mr. Underdown was also Chief Operating Officer of a Regional Engineering Company providing SubSurface, Wired and wireless Design Build services. Prior thereto, Michael was Founder and President of Chicago Fiber Systems (CFS). CFS was sold to Sunesys in 2007 which provided CFS investors an 11x's return on their money. Mr. Underdown has provided expert witness testimony on behalf of a CLEC consortium during the Triennial Review Order of 2004 and continues to support Competitive Telecommunication Infrastructure. Mr. Underdown received his BS Eastern Illinois University MS from Eastern Illinois University. In his current role as Chief Operating Officer, he has responsibility for operating and managing Neo Network Development. He has a proven track record of success in this role, and in this specific area of telecommunications. Prior to NEO,

**Laurance Lewis, Esq.**

Mr. Lewis is the Executive Vice President and General Counsel of Neo Network Development. Mr. Lewis is an attorney and real estate broker with over 20 years of experience representing clients in the negotiation and structuring of real estate acquisition, development, leasing and sales transactions. Mr. Lewis has represented various telecommunications and high-tech companies, on a national and international level, in property acquisition and disposition activities including data centers, fiber optic and wireless networks.

Mr. Lewis has represented multiple CLEC's, ISP's and Internet Backbone providers over the course of the last 20 years in various capacities including site acquisition, site development and negotiating the purchase, lease or IRU of network assets.

Mr. Lewis has participated in over \$150 Million in real estate transactions and has successfully negotiated the acquisition of over 10 million square feet of real estate in 25 states and six countries. Mr. Lewis was also the Founder of a Fiber-to-the-Home network development company that served municipal utilities, private cable operators and real estate developers. Prior to that he also served as the president of the Chicago chapter of NACORE (now known as CoreNet Global <http://www.corenetglobal.org>) CoreNet Global is the world's leading association for corporate real estate and workplace professionals, service providers and economic developers. Mr. Lewis received his undergraduate degree from the University of Iowa and obtained his Juris Doctorate from the University of Minnesota Law School.