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November 4, 2025

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WRITER'S CONTACT INFORMATION

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VIA EMAIL AND FED-EX

Mr. Steve Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, ND 58505-0480

RE: Application of BEK Communications Cooperative for Designation as the Incumbent Local Exchange Carrier, Certificate for Public Convenience and Necessity, and Eligible Telecommunications Carrier Designation

Dear Mr. Kahl:

BEK Communications Cooperative ("BEK"), by its attorneys, hereby files the above-referenced applications. The Applications request (i) the designation of BEK as the incumbent local exchange carrier; (ii) a Certificate of Public Convenience and Necessity; and (iii) Eligible Telecommunications Carrier Designation, all in the Valley City exchange of North Dakota. Enclosed for filing are the original and four (4) copies of the following,¹ which have been redacted to remove trade secret information:

- Application for Certificate of Public Convenience and Necessity and Request for Recognition as an Incumbent Local Exchange Carrier
- Application for Expansion of Eligible Telecommunications Carrier Designation
- Exhibit 1: Application for Trade Secret Protection
- Exhibit 2: Affidavit of Derrick Bulawa
- Exhibit 3: Valley City Exchange Map (National Broadband Map)
- Exhibit 4: BEK Articles of Incorporation
- Exhibit 5: BEK Certificate of Good Standing
- Exhibit 6: Balance Sheet, Income Statement, and Financial Opinion – TRADE SECRET

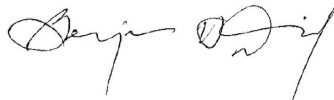
¹ An original plus four have been provided at the request of Commission Staff. BEK will provide additional copies upon request.

- Exhibit 7: Lumen Served Locations (National Broadband Map)
- Exhibit 8: BEK Served Locations (National Broadband Map)
- Exhibit 9: Abandoned Plant

In addition, one unredacted copy of these materials is enclosed under seal.

Please do not hesitate to contact the undersigned with any questions regarding these applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin H. Dickens, Jr.", with a stylized flourish at the end.

Benjamin H. Dickens, Jr.
Salvatore Taillefer, Jr.
Counsel to BEK Communication Cooperative

/encl

STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION

**Application for Certificate of Public Convenience and Necessity and Request for
Recognition as an Incumbent Local Exchange Carrier**

Pursuant to chapter 49-03.1 of the North Dakota Century Code (“NDCC”) and section 69-09-05-11 of the North Dakota Administrative Code (“NDAC”), BEK Communications Cooperative (“BEK”) hereby submits this application for a Certificate of Public Convenience and Necessity (“CPCN”) as an incumbent local exchange carrier (“ILEC”) for the Valley City exchange (the “Requested Exchange”). Due to Lumen Technologies, Inc.’s (“Lumen”) failure to maintain or upgrade its network in the Requested Exchange, and failure to fulfill a number of its obligations as a public utility under the N.D.C.C. and the N.D.A.C., the Commission should treat Lumen Technologies, Inc. (“Lumen”) – as having relinquished the Requested Exchange from its study area and assign it to BEK as an ILEC, and move its CPCN to competitive status. In support hereof, BEK states as follows:

1. BEK is a North Dakota cooperative located at 200 E Broadway, Steele, ND, 58482. Pursuant to CPCNs issued by this Commission,¹ BEK has been engaged in the business of providing local exchange telecommunications service, exchange access, and other telecommunications services as an ILEC in the following North Dakota exchange areas:

BEK ILEC Exchange Name	BEK ILEC Prefix
HAZELTON	(701)-782
KINTYRE	(701)-332
LEHR	(701)-378
LINTON	(701)-254
LINTON	(701)-321

¹ See, Telecom Docket PU-00-556, PU-01-198, and PU-13-231

LINTON	(701)-325
LINTON	(701)-329
LINTON	(701)-851
MCKENZIE	(701)-562
MCKENZIE	(701)-673
NAPOLEON	(701)-754
PETTIBONE	(701)-273
REGAN	(701)-286
ROBINSON	(701)-392
STEELE	(701)-316
STEELE	(701)-475
STEELE	(701)-556
STERLING	(701)-387
STRASBURG	(701)-336
TAPPEN	(701)-327
TUTTLE	(701)-867
WILTON	(701)-734
WING	(701)-943
WISHEK	(701)-452
WISHEK	(701)-731
ZEELAND	(701)-423

BEK seeks to provide the same services provided in these exchanges to the Requested Exchange.² BEK is the sole owner of Inter-Community Telephone Company, LLC (ICTC) which is a rural ILEC providing services in the area surrounding the Requested Exchange since 1947. Pursuant to CPCNs issued by this Commission, ICTC has been engaged in the business of providing local exchange telecommunications service, exchange access, and other telecommunications services as an ILEC in the following North Dakota exchange areas:

ICTC ILEC Exchange Name	ICTC ILEC Prefix
ABSARAKA	(701)-896
ALICE	(701)-689
BUFFALO-HEATLAND	(701)-633
DAZEY	(701)-733
HANNAFORD	(701)-769

² See, Exhibit 3: Requested Exchange Map.

HOPE	(701)-945
NOME-FINGAL	(701)-924
PAGE	(701)-668
SANBORN	(701)-646
TOWER CITY	(701)-749

2. Lumen is a Louisiana corporation headquartered at 100 CenturyLink Drive, Monroe, LA, 71203. Pursuant to a CPCN issued by the Commission,³ Lumen has been engaged in the business of providing local exchange telecommunications service, exchange access, and other telecommunications services in, among other North Dakota exchange areas, the Requested Exchange:

Lumen ILEC Exchange Name	Lumen ILEC Prefix
Valley City	701-490
Valley City	701-760
Valley City	701-840
Valley City	701-845
Valley City	701-890

3. As required by Section 69-09-05-11.1 of the NDAC, BEK attaches hereto its Articles of Incorporation as Exhibit 4 and Certificate of Good Standing as Exhibit 5.

4. As required by section 11.2, BEK attaches its balance sheet, income statement, and an independent accountant's financial opinion hereto as Exhibit 6.

5. As required by section 11.3, BEK respectfully submits that its long history of providing exceptional service to the exchanges listed in paragraph 1 – beginning in 1952 – and its provision of comparable service in the Requested Exchange – beginning in February 2015 – demonstrates (i) BEK's fitness and ability to provide service; (ii) the adequacy of the proposed

³ See, Telecom Docket PU-00-030, PU-02-114, and PU-04-160.

service; and (iii) BEK's technical, financial, and managerial qualifications to provide service.

BEK has overbuilt 100% of Lumen's aging copper network in the Requested Exchange with the same high-quality fiber-to-the-home network it operates in its ILEC territories. BEK subscribers enjoy speeds in excess of 5 Gbps (symmetrical and asymmetrical), with a maximum network retail subscriber capability of up to 10 Gbps (symmetrical and asymmetrical). BEK's core network has diverse transport capabilities of 400 Gbps. BEK also offers a full suite of TDM voice and data products, broadband service, dedicated fiber ethernet connections for businesses, IPTV services, cloud phone services, cloud surveillance services, cybersecurity services, ETS service for towers and technology critical to operations in schools, hospitals, clinics and nursing homes. Furthermore, BEK has already been approved and fully implemented two USDA Community Connect Grant projects reaching 731 locations within the Requested Exchange and Rural Digital Opportunity Funds (RDOF) project reaching 79 locations in the rural areas outside the city of Valley City within the Requested Exchange and has been designated an ETC for that purpose.

6. BEK's CEO, Derrick Bulawa, has approximately 40 years in telecommunications management positions, and the BEK team consists of 97 employees. BEK provides superior customer service in the Requested Exchange, with a customer service center, enterprise service technicians and outside plant operations within the Requested Exchange. This team is dedicated to serving the Requested Exchange and surrounding rural exchanges. There have been no telecom or customer service related complaints filed against BEK. Finally, BEK's fitness is further demonstrated by the financial investment made in the area as well as the stellar earned reputation within the Requested Exchange, evidenced by BEK being named the Best of the Best

Internet provider for the last 6 years, which was the inception of the Best of the Best market survey.⁴

7. The Commission should deem Lumen to have relinquished the Requested Exchange and convert its certificate in the Requested Exchange to competitive status. According to the National Broadband Map Fabric, 3,661 locations exist within the Requested Exchange, as shown in Exhibit 3. Lumen has represented that it can serve only 2,456 of these locations, representing approximately 67% of the total fabric, as shown in Exhibit 7.⁵ This failure to make service available to 1,205 locations constitutes a violation of Lumen's obligations to “furnish, provide, and maintain such service, instrumentalities, equipment, and facilities as shall promote the safety, health, comfort, and convenience of its patrons, employees, and the public,”⁶ “make available to **all people of this state** modern and efficient telecommunications services at the most economic and reasonable cost,”⁷ and “provide service throughout its proposed designated service area.”⁸

8. In addition to these failures, Lumen has also abandoned plant in areas it does claim to provide service, with physical infrastructure is often in a state of extreme disrepair. BEK has documented numerous instances of deteriorating outside plant conditions within the Requested Exchange, attached hereto as Exhibit 9. These documented conditions demonstrate that Lumen has abandoned proper network maintenance obligations. Additionally, upon information and belief, Lumen maintains only a handful of technicians available to service its voice telephone network statewide. Under North Dakota law, renewal of a CPCN is only

⁴ <https://www.bek.coop/coop/awards/>

⁵ BEK has confirmed that voice service is also not available at any of the sampled locations Lumen does not report as served on the National Broadband Map.

⁶ N.D.C.C. § 49-04-01

⁷ N.D.C.C. § 49-21-02(1), emphasis supplied.

⁸ N.D.A.C. § 69-09-05-12.

unnecessary where a public utility has not suspended operation of its plant,⁹ which supports BEK's assertion that Lumen's CPCN should be moved to competitive status.

9. BEK has completely overbuilt the Requested Exchange with fiber-to-the-premises facilities, funded by RDOF Funds, Community Connect Grants and BEK funds, serving 100% of the 3,661 locations identified in the National Broadband Map fabric.¹⁰ As of September 1, 2025, BEK served approximately 538 voice grade access line customers, representing an estimated 86.5% of the active landline phone market, and approximately 2,609 broadband customers, representing an estimated 73% of the National Broadband Map fabric. Furthermore, BEK surveyed the portion of the market that did not subscribe to BEK services and determined that only 84 locations indicated they received service from Lumen.

10. According to the National Broadband Map, Lumen's network within the Requested Exchange consists predominantly of copper facilities offering speeds of only 10/1 Mbps primarily within the city limits of Valley City.¹¹ These speeds have not met the Commission's definition of broadband for a decade, as the Commission currently defines broadband as service delivering at least 25 Mbps downstream and 3 Mbps upstream.¹² Additionally, Lumen has been the subject of approximately 87% of all telecommunications complaints filed with the Commission between 2014 and 2025. The continued provision of 10/1 Mbps service, combined with the high volume of complaints and documented evidence of deteriorating network infrastructure, indicates Lumen's systematic abandonment of its obligations within the Requested Exchange. These conditions demonstrate both a substantial

⁹ N.D.C.C. § 49-03.1-07.

¹⁰ See, Exhibit 8.

¹¹ See, e.g., Valley City City Hall, 202 E Main St, Valley City, ND, 58072, https://broadbandmap.fcc.gov/location-summary/fixed?version=dec2024&location_id=afaf5e4a-e37e-4d46-a51a-dd58adb54b46&addr1=202+E+MAIN+ST&addr2=VALLEY+CITY%2C+ND+58072&zoom=15.81&vlon=-98.000904&vlat=46.923092&br=r&speed=100%20&tech=1%203%206%207, last visited October 31, 2025.

¹² See, 2015 Broadband Progress Report, 30 FCC Rcd. 13775, 1377 (2015).

need for enhanced telecommunications services in the Requested Exchange and significant consumer demand for BEK's superior network capabilities and customer service offerings.

11. In addition to the foregoing, the grant of BEK's application and the treatment of the Requested Exchange as relinquished by Lumen is in the public interest. As demonstrated, BEK has substantially replaced Lumen as the ILEC in the Requested Exchange and consumers' migration from Lumen to BEK is a testament to the superiority of BEK's network and services. Furthermore, the FCC has held that ILEC treatment makes the LEC subject to the additional market opening requirements in section 251(c) of the Communications Act, which is objectively in the public interest.¹³ This Commission has found the grant of a CPCN as an incumbent local exchange under substantially similar circumstances to be in the public interest.¹⁴ Granting this application will support North Dakota's broadband goals of prioritizing Fiber-to-the-Premises: helping to solidify North Dakota's Broadband Strategy.¹⁵

12. The Commission has authority under section 49-21-01.7(7) of the NDCC to act upon applications for CPCNs as an ILEC.

13. BEK asks that the Commission grant the instant application without a hearing if no interested party has requested a hearing on this application after receiving at least twenty (20) days' notice of opportunity to request such a hearing.

¹³ *In the Matter of Petition for Mid-Rivers Telephone Cooperative, Inc.*, 21 FCC Rcd 11506, 11514-11515 (2006). BEK currently operates as a CLEC in the Requested Exchange; accordingly, ILEC requirements are not currently applicable to BEK in the Requested Exchange.

¹⁴ *See*, Order of the North Dakota Public Service Commission, Case Nos. PU-24-386 and PU-24-387, adopted March 26, 2025 (finding the application of Griggs County Telephone Co. to provide local exchange telecommunications service as the incumbent in the Leonard and Kindred exchanges to be in the public interest).

¹⁵ <https://www.ndit.nd.gov/about-us/broadband>.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Derrick Bulawa", written over a horizontal line.

Derrick Bulawa, CEO

BEK Communications Cooperative

Dated this 3 day of Nov, 2025

STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION

Application for Expansion of Eligible Telecommunications Carrier Designation

Pursuant to Chapter 49-21 of the North Dakota Century Code (“NDCC”), and in connection with its Application for Certificate of Public Convenience and Necessity (“CPCN”), BEK Communications Cooperative (“BEK”) requests an expansion of its designation as an Eligible Telecommunications Carrier (“ETC”) to include the Valley City exchange (the “Requested Exchange”). In support hereof, BEK states as follows:

1. BEK has been designated by the Commission as an ETC to receive universal service support under Section 214 and 254 of the Communications Act of 1934, as amended, (the “Act”) in the 29 exchanges, where it is the incumbent local exchange carrier (“ILEC”). BEK’s study area codes (“SAC”) are 381604 and 389025 and ICTC study area codes (“SAC”) are 381616 and 381601, surrounding the Requested Exchange.

2. BEK has completely overbuilt the incumbent – Lumen Technologies, Inc. (“Lumen”) – in the Requested Exchange with BEK fiber, available to 100% of Lumen’s customers and 100% of all 3,661 locations within the Requested Exchange. Accordingly, the expansion of ETC designation by BEK does not involve the transfer or acquisition of legacy assets or facilities from Lumen.

3. It is in the public interest to expand the BEK ETC designated service area to incorporate the Requested Exchange. As indicated, BEK has completely overbuilt Lumen and the Requested Exchange with a fully fiber-to-the-home, offering speeds up to 10 Gbps, while Lumen’s network consists predominantly of copper facilities that offer a speed of 10/1 Mbps

5. The Commission has authority under NDCC § 49-21-01.7(13) to designate geographic service areas for ETCs to receive universal service support under sections 214 and 254 of the Act.

⁴ 47 U.S.C. 214(e); Affidavit of Derrick Bulawa.

6. BEK asks that the Commission grant the instant application without a hearing if no interested party has requested a hearing on this application after receiving at least twenty (20) days' notice of opportunity to request such a hearing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Derrick Bulawa", written over a horizontal line.

Derrick Bulawa, CEO

BEK Communications Cooperative

Dated this 3 day of Nov, 2025

Exhibit 1

Application for Trade Secret

**STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION**

Application for Trade Secret

COMES NOW, BEK Communications Cooperative (“BEK”) and respectfully moves the Commission for entry of a trade secret protective order under section 69-02-09-01 of the North Dakota Administrative Code. The purpose of the requested protective order is to protect against public disclosure of trade secret information as defined by section 47-25.1-01 of the North Dakota Century Code.

In support of the motion, BEK states as follows:

1. A general description of the nature of the information sought to be protected.

BEK wishes to protect from the disclosure of financial information contained in the Financial Statement (Exhibit 6 in its entirety).

2. Explanation of why the information derives independent economic value.

The financial information could have economic value to potential competitors. This type of information in a competitive telecommunications marketplace is highly sensitive, and its public disclosure could place BEK at an unfair competitive disadvantage.

3. An explanation of why the information is not readily ascertainable by proper means by other persons.

BEK maintains the confidentiality of its financial information and does not make it readily available by proper means to competitors or the general public.

4. A general description of the persons or entities that would obtain economic value from the disclosure or use of the information.

If disclosed, competitive Local Exchange Carriers could use the financial information against BEK's interests.

5. A specific description of known competitors and competitors' goods and services that is pertinent to the tariff or rate filing.

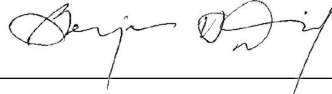
Not Applicable.

6. A description of the efforts used to maintain the secrecy of the information.

BEK's financial information is not disclosed to the public or to persons other than employees or authorized agents of the Company who need to know the information to fulfill their responsibilities or to third persons pursuant to an agreement to maintain the confidentiality of the information.

In accordance with section 69-02-09-02 of the North Dakota Administrative Code, BEK provides one copy of the trade secret material in the enclosed sealed envelope labeled: EXHIBIT 6 - TRADE SECRET - PRIVATE.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Benjamin H. Dickens, Jr.", is written over a horizontal line.

Benjamin H. Dickens, Jr.
Salvatore Taillefer, Jr.

BEK Communications Cooperative

Dated this 3 day of Nov, 2025

Exhibit 2

Affidavit of Derrick Bulawa

**STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION**

Affidavit of Derrick Bulawa

I, Derrick Bulawa, state under oath:

1. My name is Derrick Bulawa, and I am the CEO of BEK Communications Cooperative ("BEK").

2. I submit this affidavit in support of BEK's application for a Certificate of Public Convenience and Necessity ("CPCN") in the Valley City exchange (the "Requested Exchange"), and to expand BEK's study area and ETC designated geographic service area to incorporate the Requested Exchange.

3. I am familiar with Section 69-09-05-12 of the North Dakota Administrative Code ("NDAC") which addresses ETC application requirements.

a. In support of NDAC Section 69-09-05-12 2.a: The proposed service area consists of the Requested Exchange in its entirety. Lumen is the current incumbent local exchange carrier serving the Requested Exchange, and BEK has asked this Commission to treat Lumen as having relinquished the Requested Exchange from its study area.

b. In support of section 69-09-05-12 2.b: BEK currently meets all ETC obligations in its designated service area and will continue to meet those obligations in the Requested Exchange. BEK already meets all ETC obligations in portions of the Requested Exchange due to its designation as an ETC for purposes of the Federal Communications Commission ("FCC") Rural Digital Opportunity Fund ("RDOF") program.

c. In support of section 69-09-05-12 2.c: BEK will not require a waiver of any ETC requirements.

d. In support of section 69-09-05-12 3.a: BEK is committed to providing service throughout the proposed service area to all customers making a reasonable request for service. I certify that (1) BEK will provide service in a timely manner where the network passes the potential customer and (2) BEK will provide service within a reasonable period of time if the potential customer is within the proposed designated service area but outside existing network coverage, if BEK can provide service at a reasonable cost. BEK will continue to provide outstanding customer service, and to upgrade and maintain its network in the Requested Exchange.

e. In support of section 69-09-05-12 3.b: BEK does not expect to receive federal high-cost universal service support in the first year following designation as ETC other than the RDOF support it already receives for portions of the Requested Exchange.

f. In support of section 69-09-05-12 3.c: I certify that BEK has a reasonable amount of backup power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

g. In support of section 69-09-05-12 3.d: I certify that BEK will satisfy applicable consumer protection and consumer standards established by the Commission.

h. In support of section 69-09-05-12 3.e: I certify that BEK will offer a local usage plan similar to the plan offered by Lumen.

i. In support of section 69-09-05-12 3.f: I acknowledge that the Commission has the authority to require BEK to provide equal access to long-distance carriers in the event no other ETC is providing equal access in the proposed service area.

4. In consideration of the foregoing, BEK asks the Commission to grant its request for expansion of its CPCN and ETC designation to incorporate the Requested Exchange, which

BEK has asked the Commission to treat as having been relinquished by Lumen. BEK has demonstrated its ability to meet all criteria for an ETC in its currently designated service area and will continue to do so for the expanded service area.

Respectfully submitted,



Derrick Bulawa, CEO

BEK Communications Cooperative

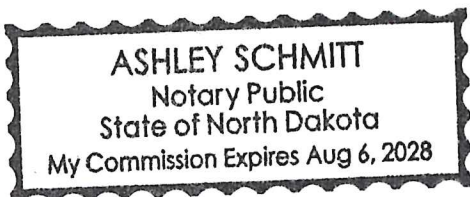
Dated this 3 day of Nov, 2025

STATE of NORTH DAKOTA

COUNTY of Burleigh

On this 3 day of November, 2025, before me, a Notary Public in and for said County and State, personally appeared Derrick Bulawa, known to me to be the person described in and executed within instrument and acknowledge to me that he executed the same.

SEAL



Notary Public

My Commission Expires: _____

Exhibit 3

Map of Requested Exchange

N





Lake
Ashtabula

VCX

Valley City

Legend

-  VCX Exchange Boundary
-  Broadband Fabric Locations

Total Broadband Fabric Locations

3661

Exhibit 4

Articles of Incorporation

AMENDED ARTICLES OF INCORPORATION
Of
BEK COMMUNICATIONS COOPERATIVE

KNOW ALL MEN OF THESE PRESENTS: That we, the undersigned, have this day voluntarily associated ourselves together for the purpose of forming a corporation under the provisions of Chapter 10-12, Revised Code of 1943, and amendments thereto; and we hereby certify that:

1. The name of said corporation is BEK Communications Cooperative.⁵
2. The purpose of this corporation is to furnish, improve and expand communications services to the residents of the territory in which it operates.⁴
3. The principal place of business of said corporation shall be in the city of Steele, in Kidder County, North Dakota.
4. [Deleted].^{1,7,11}
5. This cooperative is organized without capital stock and the property rights and interest of the members shall be unequal. The general rules applicable to all members by which the property rights and interests respectively of each member shall be determined and fixed are as follows: Upon dissolution, after (a) all debts and liabilities of the cooperative shall have been paid, and (b) all capital furnished through patronage shall have been retired as provided in the bylaws, the remaining property and assets of the cooperative shall be distributed among the members and former members in the proportion which the aggregate patronage of each bears to the total patronage of all such members.
6. [deleted] ^{2,3,6,7}
7. The number of its directors shall be limited to no more than nine.^{7,8,9,10}
8. The time for which this corporation is to exist is not limited, but it shall exist perpetually, unless dissolved according to the law.
9. These Articles and the Bylaws of the Cooperative may only be altered, amended, or repealed as set out in the Bylaws. ¹¹

IN WITNESS WHEREOF, We have hereunto set our hands and seals this 3rd day of October, A. D. 1952.

Amended: 1) October 14, 1954; 2) June 12, 1970; 3) June 10, 1977; 4) June 7, 1979; 5) June 14, 1990; 6) June 12, 1997; 7) June 8, 2000; 8) June 12; 2003; 9) June 9, 2011, 10) June 9, 2016, 11) June 10, 2021.

Exhibit 5

Certificate of Good Standing

State of North Dakota

SECRETARY OF STATE



Certificate of Good Standing of BEK COMMUNICATIONS COOPERATIVE

SOS Control ID#: 0000013967

Certificate #: 027925932-1

The undersigned, as Secretary of State of the state of North Dakota, hereby certifies that, according to the records of this office,

BEK COMMUNICATIONS COOPERATIVE

a Cooperative - Mutual Aid was formed under the laws of NORTH DAKOTA and filed with this office effective October 16, 1952. This entity has, as of the date set forth below, complied with all applicable North Dakota laws.

ACCORDINGLY, the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Good Standing.

DATE: October 29, 2025

A handwritten signature in black ink that reads "Michael Howe".

Michael Howe
Secretary of State

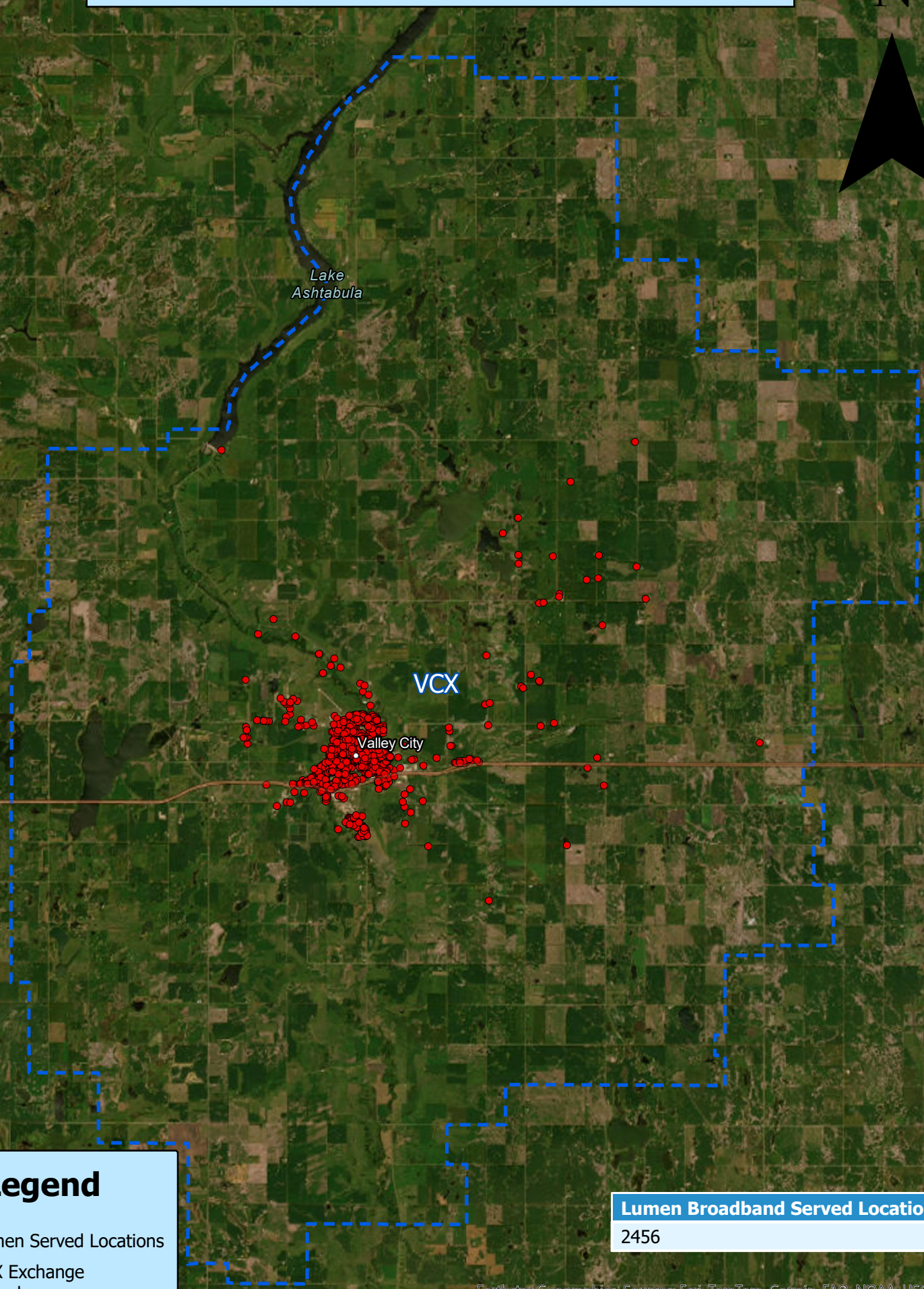
TRADE SECRET - REDACTED IN FULL

Exhibit 6

**Balance Sheet, Income Statement, and
Financial Opinion**

Exhibit 7

**Lumen Servable Locations per
National Broadband Map**



Legend

- Lumen Served Locations
- VCX Exchange Boundary

Lumen Broadband Served Locations
2456

Exhibit 8

BEK Servable Locations per National Broadband Map

N



Lake
Ashtabula

VCX

Valley City

Legend

● BEK Served Locations

--- VCX Exchange
Boundary

BEK Broadband Served Locations

3661

Earthstar Geographics, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, ©
OpenStreetMap contributors, and the GIS User Community

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Exhibit 9

Lumen Plant in Requested Exchange

REDACTED - FOR PUBLIC INSPECTION



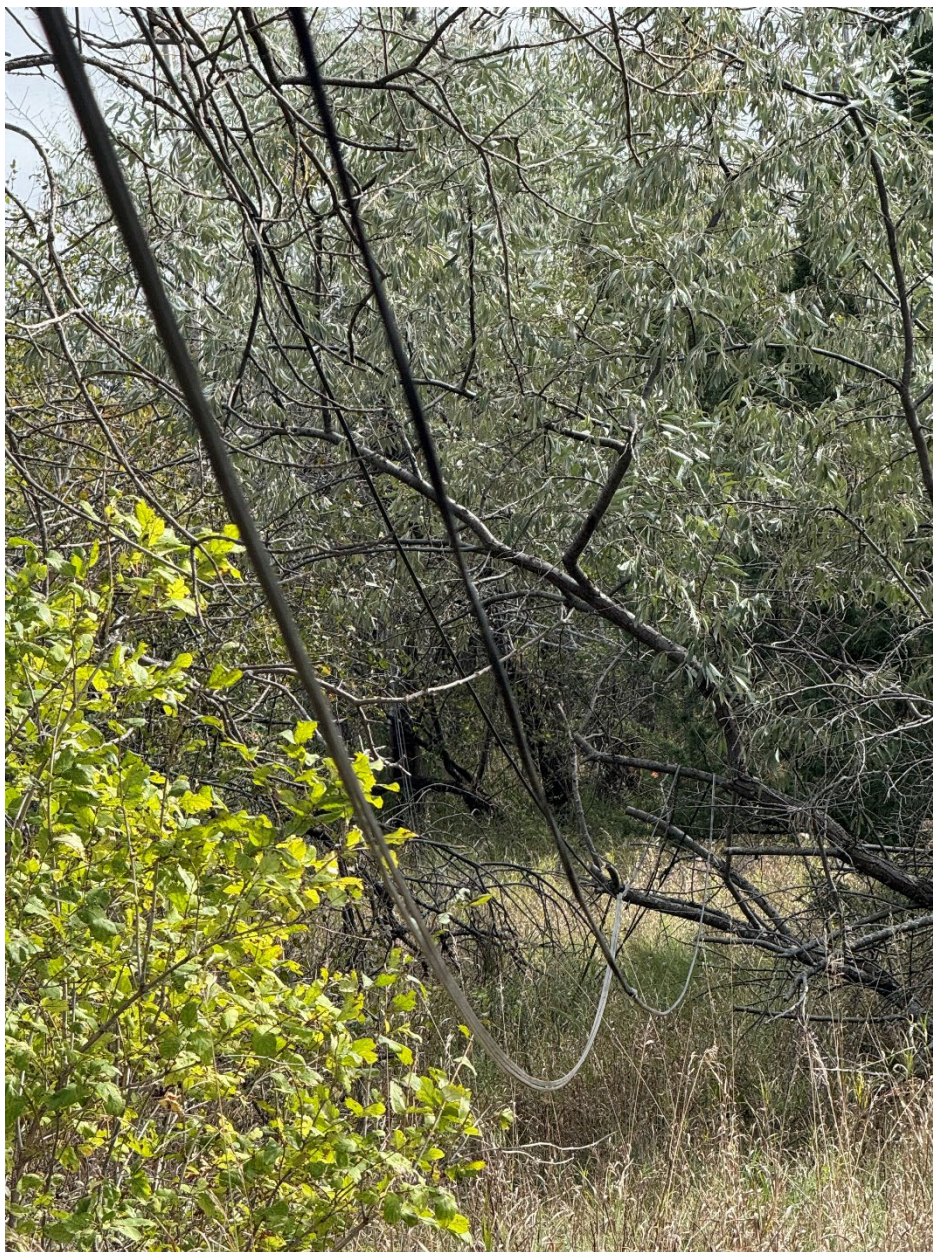
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