

**Exhibit C**

ICA AGREEMENT BETWEEN

Wide Voice LLC

AND

Verizon

**Jennifer Ross**  
Director - Interconnection  
Global Wholesale



**Global Wholesale**  
ONE VERIZON WAY  
2 Floor, Room VC 32-W412B  
Basking Ridge, NJ 07920

Phone: 908-559-4556  
jennifer.e.ross@one.verizon.com

February 10, 2012

**Patrick J. Chicas**  
President  
Wide Voice, LLC  
410 South Rampart  
Suite 390  
Las Vegas, NV 89145

Re: Requested Adoption Under Section 252(i) of the Communications Act

Dear Mr. Chicas:

Verizon New York Inc. ("Verizon"), a New York corporation, with principal place of business at 140 West Street, New York, NY 10007, has received correspondence stating that Wide Voice, LLC ("WID"), a Nevada limited liability company, with principal place of business at 410 South Rampart, Suite 390, Las Vegas, Nevada 89145 wishes, pursuant to Section 252(i) of the Communications Act, to adopt the terms of the Interconnection Agreement between Cincinnati Bell Any Distance Inc. ("CBAD") and Verizon that was approved by the New York State Public Service Commission (the "Commission") as an effective agreement in the State of New York, as such agreement exists on the date hereof (including, without limitation, Amendment 1 thereto) after giving effect to operation of law (the "Terms"). I understand WID has a copy of the Terms. Please note the following with respect to WID's adoption of the Terms.

1. By WID's countersignature on this letter, WID hereby represents and agrees to the following seven points:
  - A. WID adopts (and agrees to be bound by) the Terms and, in applying the Terms, agrees that WID shall be substituted in place of Cincinnati Bell Any Distance Inc. and CBAD in the Terms wherever appropriate.
  - B. For the avoidance of any doubt, adoption of the Terms does not include adoption of any provision imposing an unbundling obligation on Verizon (i) that no longer

applies to Verizon under the Report and Order and Order on Remand (FCC 03-36) released by the Federal Communications Commission ("FCC") on August 21, 2003 in CC Docket Nos. 01-338, 96-98, 98-147 ("Triennial Review Order"), or the Order on Remand in WC Docket No. 04-313 and CC Docket No. 01-338, released by the FCC on February 4, 2005 (the "TRO Remand Order"), or (ii) that is otherwise not required by 47 U.S.C. Section 251(c)(3) or by 47 C.F.R. Part 51.

- C. Notice to WID and Verizon as may be required or permitted under the Terms shall be provided as follows:

To Wide Voice, LLC:

Attention: Tara Odenthal, Operating Manager  
410 South Rampart  
Suite 390  
Las Vegas, NV 89145  
Telephone Number: (702) 553-3007, Ext.: none  
Facsimile Number: (562) 437-1422  
Internet Address: tara@widevoice.com

To Verizon:

Director-Negotiations  
Verizon Global Wholesale  
600 Hidden Ridge  
HQEWMNOTICES  
Irving, TX 75038  
Facsimile Number: (972) 719-1519  
Internet Address: wmnotices@verizon.com

with a copy to:

Vice President and Deputy General Counsel  
Verizon Global Wholesale  
1320 N. Court House Road  
9<sup>th</sup> Floor  
Arlington, VA 22201  
Facsimile: (703) 351-3656

- D. WID represents and warrants that it is a certified provider of local telecommunications service in the State of New York, and that its adoption of the Terms will cover services in the State of New York only.
- E. In the event an interconnection agreement between Verizon and WID is currently in effect in the State of New York (the "Original ICA"), this adoption shall be an amendment and restatement of the operating terms and conditions of the Original ICA, and shall replace in their entirety the terms of the Original ICA. This adoption is not intended to be, nor shall it be construed to create, a novation or accord and satisfaction with respect to the Original ICA. Any outstanding payment obligations of the parties that were incurred but not fully performed under the Original ICA shall constitute payment obligations of the parties under this adoption.
- F. Verizon's standard pricing schedule for interconnection agreements in the State of New York (as such schedule may be amended from time to time) (attached as

Appendix A hereto) shall apply to WID's adoption of the Terms; provided, however, that if the Terms memorialize acceptance of Verizon's offer of an optional reciprocal compensation rate plan for non-Internet traffic subject to Section 251(b)(5) pursuant to the industry letter described in footnote 2 of this Letter, then the optional reciprocal compensation rate plan in the Terms shall apply to this adoption instead of the reciprocal compensation rates set forth in Appendix A. WID should note that the aforementioned pricing schedule may contain rates for certain services the terms for which are not included in the Terms or that are otherwise not part of this adoption, and may include phrases or wording not identical to those utilized in the Terms. In an effort to expedite the adoption process, Verizon has not deleted such rates from the pricing schedule or attempted to customize the wording in the pricing schedule to match the Terms. However, the inclusion of such rates in no way obligates Verizon to provide the subject services and in no way waives Verizon's rights, and the use of different wording or phrasing in the pricing schedule does not alter the obligations and rights set forth in the Terms.

- G. WID's adoption of the Terms shall become effective on February 6, 2012. Verizon shall file this adoption letter with the Commission promptly upon receipt of an original of this letter countersigned by WID as to the points set out in Paragraph One hereof. The term and termination provisions of the Terms shall govern WID's adoption of the Terms. The adoption of the Terms is currently scheduled to expire on November 28, 2012.
2. As the Terms are being adopted by WID pursuant to Section 252(i) of the Act, Verizon does not provide the Terms to you as either a voluntary or negotiated agreement. The filing and performance by Verizon of the Terms does not in any way constitute a waiver by Verizon of any position as to the Terms or a portion thereof, nor does it constitute a waiver by Verizon of all rights and remedies it may have to seek review of the Terms, or to seek review in any way of any provisions included in the Terms as a result of WID's adoption of the Terms.
  3. Nothing herein shall be construed as or is intended to be a concession or admission by Verizon that any provision in the Terms complies with the rights and duties imposed by the Act, the decisions of the FCC and the Commission, the decisions of the courts, or other law, and Verizon expressly reserves its full right to assert and pursue claims arising from or related to the Terms.
  4. Verizon reserves the right to deny WID's application of the Terms, in whole or in part, at any time:
    - A. when the costs of providing the Terms to WID are greater than the costs of providing them to CBAD;
    - B. if the provision of the Terms to WID is not technically feasible; and/or
    - C. to the extent that Verizon otherwise is not required to make the Terms available to WID under applicable law.
  5. For the avoidance of any doubt, please note that adoption of the Terms will not result in reciprocal compensation payments for Internet traffic. Verizon has always taken the position that reciprocal compensation was not due to be paid for Internet traffic under section 251(b)(5) of the Act. Verizon's position that reciprocal compensation is not to be

paid for Internet traffic was confirmed by the FCC in the Order on Remand and Report and Order adopted on April 18, 2001 and in the Order on Remand and Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 99-68, (adopted November 5, 2008) ("*FCC Internet Orders*"), which held that Internet traffic constitutes "information access" outside the scope of the reciprocal compensation obligations set forth in section 251(b)(5) of the Act.<sup>1</sup> Accordingly, any compensation to be paid for Internet traffic will be handled pursuant to the terms of the *FCC Internet Orders*, not pursuant to adoption of the Terms.<sup>2</sup> Moreover, in light of the *FCC Internet Orders*, even if the Terms include provisions invoking an intercarrier compensation mechanism for Internet traffic, any reasonable amount of time permitted for adopting such provisions has expired under the FCC's rules implementing section 252(i) of the Act.<sup>3</sup> In fact, the *FCC Internet Orders* made clear that carriers may not adopt provisions of an existing interconnection agreement to the extent that such provisions provide compensation for Internet traffic.<sup>4</sup>

6. Should WID attempt to apply the Terms in a manner that conflicts with Paragraphs Two through Paragraphs Five above, Verizon reserves its rights to seek appropriate legal and/or equitable relief.
7. In the event that a voluntary or involuntary petition has been or is in the future filed against WID under bankruptcy or insolvency laws, or any law relating to the relief of debtors, readjustment of indebtedness, debtor reorganization or composition or extension of debt (any such proceeding, an "Insolvency Proceeding"), then: (A) all rights of Verizon under such laws, including, without limitation, all rights of Verizon under 11 U.S.C. § 366, shall be preserved, and WID's adoption of the Terms shall in no way impair such rights of Verizon; and (B) all rights of WID resulting from WID's adoption of the Terms shall be subject to and modified by any Stipulations and Orders entered in the Insolvency Proceeding, including, without limitation, any Stipulation or Order providing adequate assurance of payment to Verizon pursuant to 11 U.S.C. § 366.

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<sup>1</sup> Order on Remand and Report and Order, In the Matters of: Implementation of the Local Competition Provisions in the Telecommunications Act of 1996 and Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68 (rel. April 27, 2001) ("*FCC Remand Order*") ¶44, *remanded*, *WorldCom, Inc. v. FCC*, No. 01-1218 (D.C. Cir. May 3, 2002). Although the D.C. Circuit remanded the *FCC Remand Order* to permit the FCC to clarify its reasoning, it left the order in place as governing federal law. See *WorldCom, Inc. v. FCC*, No. 01-1218, slip op. at 5 (D.C. Cir. May 3, 2002).

<sup>2</sup> For your convenience, an industry letter distributed by Verizon explaining its plans to implement the FCC Internet Order can be viewed at [http://www22.verizon.com/wholesale/library/local/industryletters/1\\_east-wholesale-resources-clec\\_01-05\\_21.00.html](http://www22.verizon.com/wholesale/library/local/industryletters/1_east-wholesale-resources-clec_01-05_21.00.html).

<sup>3</sup> See, e.g., 47 C.F.R. Section 51.809(c).

<sup>4</sup> *FCC Internet Order* ¶ 82.

**SIGNATURE PAGE**

Please arrange for a duly authorized representative of WID to sign this letter in the space provided below and return it to Verizon.


Sincerely,

VERIZON NEW YORK INC.

  
\_\_\_\_\_  
Jennifer Ross  
Director-Interconnection

Reviewed and countersigned as to Paragraph 1:

WIDE VOICE, LLC

  
\_\_\_\_\_  
Patrick J. Chicas  
President

Attachment



June 19, 2021

## Telecom Fund Contribution Certification

### Exhibit D

I, Anne Kwong, VP of Operations of Opentact Inc (the "Applicant" or "Opentact"), hereby certifies that Opentact complies with:

a) its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H; b) its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii); c) its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17, 52.32; d) its obligations to pay regulatory fees under 47 CFR § 1.1154; and e) its 911 obligations under 47 CFR part 9.

499 Filings are submitted under the name Opentact 499 Filer ID: 834261

Anne Kwong

*Anne Kwong*  
VP of Operations  
akwong@opentact.org  
(484) 424-9683

Exhibit D

**FCC** Federal Communications Commission

FCC site info

FCC Form 499 Filer Database  
**DETAILED INFORMATION**

Form 499 Filer 834261 RSS Feed



## 2021 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting 2020 Revenues)

Approval by OMB  
3060-0855

&gt;&gt;&gt; Please read instructions before completing. &lt;&lt;&lt;

Annual Filing — due April 1, 2021

## Block 1. Contributor Identification Information

During the year, filers must refile Blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See Instructions.

101 Filer 499 ID [If you don't know your number, contact the administrator at (888) 641-8722.

If you are a new filer, write "NEW" in this block and a Filer 499 ID will be assigned to you.]

102 Legal name of filer

Opentact, Inc.

103 IRS employer identification number

[Enter 9 digit number] 85-3508930

104 Name filer is doing business as

Opentact

105 Telecommunications activities of filer [Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance -- see instructions.]

☐ Audio Bridging (teleconferencing) Provider☐ CAP/CLEC☐ Cellular/PCS/SMR (wireless telephony inc. by resale)☐ Coaxial Cable☐ Incumbent LEC☒ 1 Interconnected VoIP☐ Interexchange Carrier (IXC)☐ Local Reseller☐ Non-Interconnected VoIP☐ Operator Service Provider☐ Paging☐ Payphone Service Provider☐ Prepaid Card☐ Private Service Provider☐ Satellite Service Provider☐ Shared-Tenant Service Provider / Building LEC☐ SMR (dispatch)☒ 2 Toll Reseller☐ Wireless Data☐ Other Local☐ Other Mobile☐ Other Toll

If Other Local, Other Mobile or Other Toll is checked,

describe carrier type / services provided: →

106.1 Affiliated Filers Name/Holding company name (All affiliated companies must show the same name on this line.)

Check if filer has no affiliates



106.2 Affiliated Filers Name/Holding company IRS employer identification number

[Enter 9 digit number]

107 FCC Registration Number (FRN) [https://fjallfoss.fcc.gov/coreWeb/publicHome.do]

[For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov]

[Enter 10 digit number] 0030149645

108 Management company [if filer is managed by another entity]

109 Complete mailing address of reporting entity  
corporate headquarters

Street1 2232 Dell Range Blvd

Street2 Ste. 245

Street3

City Cheyenne

State WY

Zip (postal code) 82009

Country if not USA United States

110 Complete business address for customer inquiries and complaints

check if same address as Line 109



Street1 2232 Dell Range Blvd

Street2 Ste. 245

Street3

City Cheyenne

State WY

Zip (postal code) 82009

Country if not USA United States

111 Telephone number for customer complaints and inquiries [Toll-free number if available]

( 484 ) - 424-9683

ext -

112 List all trade names used in the past 3 years in providing telecommunications. Include all names by which you are known by customers.

a  
b  
c  
d  
e  
fg  
h  
i  
j  
k  
l

Use additional sheets if necessary. Each filer must provide all names used for telecommunications activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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FCC Form 499-A / 2021

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# 2021 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting 2020 Revenues)

Page 2

## Block 2-A: Regulatory Contact Information

201 Filer 499 ID [from Line 101]				
202 Legal name of filer [from Line 102]	Opentact, Inc.			
203 Person who completed this Worksheet	First Carol	MI	Last Lisowski	
204 Telephone number of this person	( 702 ) - 497-8730	ext -		
205 Fax number of this person	( 855 ) - 630-0748			
206 Email of this person [not for public release]	CHLSolutions@msn.com			
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Office Opentact, Inc.	Attn First name Anne	MI	Last Kwong
check if same name as Line 203 <input type="checkbox"/>	Email [not for public release] anne@opentact.org	Phone ( 484 ) - 424-9683	ext -	Fax ( ) -
check if same address as Line 109 <input checked="" type="checkbox"/>	Street1 2232 Dell Range Blvd			
	Street2 Ste. 245			
	Street3			
	City Cheyenne	State WY	Zip (postal code) 82009	Country if not USA United States
208 Billing address and billing contact person	Company Opentact, Inc.	Attn First name Anne	MI	Last Kwong
[Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.]	Email [not for public release] anne@opentact.org	Phone ( 484 ) - 424-9683	ext -	Fax ( ) -
check if name and address same as Line 207 <input type="checkbox"/>	Street1 2232 Dell Range Blvd			
	Street2 Ste. 245			
	Street3			
	City Cheyenne	State WY	Zip (postal code) 82009	Country if not USA United States
208.1 Email address pertaining to ITSP regulatory fcc issues	[not for public release] anne@opentact.org			

## Block 2-B: Agent for Service of Process

All carriers and providers of interconnected and non-interconnected VoIP must complete Lines 209 through 213. During the year, these filers must refile Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.

209 D.C. Agent for Service of Process	Company LOKT	Attn First name Kris	MI	Last Twomey
210 Telephone number of D.C. agent	( 202 ) - 681-1850	ext -		
211 Fax number of D.C. agent	( 202 ) - 517-9175			
212 Email of D.C. agent	kris@lokt.net			
213 Complete business address of D.C. agent for hand service of documents	Street1 1725 I Street, NW			
	Street2 Ste. 300			
	Street3			
	City Washington	State DC	Zip 20006	
214 Local/alternate Agent for Service of Process (optional)	Company	Attn First name	MI	Last
215 Telephone number of local/alternate agent	( ) -	ext -		
216 Fax number of local/alternate agent	( ) -			
217 Email of local/alternate agent				
218 Complete business address of local/alternate agent for hand service of documents	Street1			
	Street2			
	City	State	Zip (postal code)	Country if not USA United States

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FCC Form 499-A / 2021

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# 2021 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting 2020 Revenues)

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## Block 24: FCC Registration and Contact Information

Filers must refile Blocks 1, 2 and 6  
if there are any changes in this section. See Instructions.

219 Filer 499 ID [from Line 101]

220 Legal name of filer [from Line 102]

Opentact, Inc.

221 Chief Executive Officer (or, highest ranking company officer  
if the filer does not have a chief executive officer)

First Anne

MI

Last

Kwong

222 Business address of individual named on Line 221

Street1 2232 Dell Range Blvd

Street 2 Ste. 245

Street 3

City Cheyenne

State WY

Zip (postal code) 82009

Country if not USA

United States

check if same as Line 109 ☒

223 Second ranking company officer, such as Chairman  
(Must be someone other than the individual listed on Line 221)

First

MI

Last

224 Business address of individual named on Line 223

Street1

Street 2

Street 3

City

State

Zip (postal code)

Country if not USA

United States

check if same as Line 109 ☐

225 Third ranking company officer, such as President or Secretary  
(Must be someone other than individuals listed on  
Lines 221 or 223)

First

MI

Last

226 Business address of individual named on Line 225

Street1

Street 2

Street 3

City

State

Zip (postal code)

Country if not USA

United States

check if same as Line 109 ☐

227 Indicate jurisdictions in which the filer provides service. Include jurisdictions in which service was provided in the past 15 months  
and jurisdictions in which service is likely to be provided in the next 12 months.

☐ Alabama

☐ Guam

☐ Massachusetts

☐ New York

☐ Tennessee

☐ Alaska

☐ Hawaii

☐ Michigan

☐ North Carolina

☐ Texas

☐ American Samoa

☐ Idaho

☐ Midway Atoll

☐ North Dakota

☐ Utah

☐ Arizona

☐ Illinois

☐ Minnesota

☐ Northern Mariana Islands

☐ U.S. Virgin Islands

☐ Arkansas

☐ Indiana

☐ Mississippi

☐ Ohio

☐ Vermont

☐ California

☐ Iowa

☐ Missouri

☐ Oklahoma

☐ Virginia

☐ Colorado

☐ Johnston Atoll

☐ Montana

☐ Oregon

☐ Wake Island

☐ Connecticut

☐ Kansas

☐ Nebraska

☐ Pennsylvania

☐ Washington

☐ Delaware

☐ Kentucky

☐ Nevada

☐ Puerto Rico

☐ West Virginia

☐ District of Columbia

☐ Louisiana

☐ New Hampshire

☐ Rhode Island

☐ Wisconsin

☐ Florida

☐ Maine

☐ New Jersey

☐ South Carolina

☒ Wyoming

☐ Georgia

☐ Maryland

☐ New Mexico

☐ South Dakota

228 Year and month filer first provided (or expects to provide) telecommunications in the U.S.

☐ Check if prior to 1/1/1999, otherwise: Year 2021

Month 4

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FCC Form 499-A / 2021

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## 2021 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting 2020 Revenues)

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**Block 4: CERTIFICATION: to be signed by an officer of the filer**

601 Filer 499 ID [from Line 101]

602 Legal name of filer [from Line 102]

Opentact, Inc.

Section IV of the instructions provides information on which types of filers are required to file for which purposes. Any filer claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which filers meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify below.]

603 I certify that the filer is exempt from contributing to:

Universal Service ☒TRS ☐NANPA ☐LNP Administration ☐

Provide explanation below:

For the first year of business, the company anticipates being de minimis.

604 Please indicate whether the reporting entity is

State or Local Government Entity ☐I.R.C. § 501 or State Tax Exempt (see instructions) ☐

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's rules. ☒

I certify that I am an officer of the above-named filer as defined in the instructions, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named filer is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in section III-B of the instructions.

606 Signature

607 Printed name of officer

First Anne

MI

Last Kwong

608 Position with reporting entity

VP of Operations

609 Business telephone number of officer

( 484 ) - 424-9683

ext -

610 Email of officer || not for public release ||

anne@opentact.org

611 Date

03/11/2021

612 Check those that apply:



Original April 1 filing for year



New filer, registration only



Revised filing with updated registration



Revised filing with updated revenue data

Do not mail checks with this form. **File this form online:** <https://forms.universalservice.org/portal/login>. For additional information regarding this worksheet contact: (888) 641-8722 or via email: [Form499@usac.org](mailto:Form499@usac.org)

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FCC Form 499-A / 2021

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May 21, 2021

**Key Personnel Certification**

**Exhibit E**

I, Anne Kwong, VP of Operations of Opentact Inc (the "Applicant" or "Opentact"), hereby certifies that Opentact Inc possesses the financial, managerial, and technical expertise to provide reliable service.

Officers of the Company are:

President / Managing Director: Patrick Zhang

Vice President of Operations: Anne Kwong

In addition, I certify that the Applicant is not being investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order; and that pursuant to 47 CFR §§ 1.2001-1.2002 no party to the application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

Anne Kwong

Anne Kwong  
VP of Operations  
[akwong@opentact.org](mailto:akwong@opentact.org)  
(484) 424-9683

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Exhibit E