



151 Southhall Lane, Ste. 450  
Maitland, FL 32751  
www.inteserra.com

December 22, 2023  
Via Overnight Delivery

RECEIVED  
2024 JAN -4 AM 10:16  
PUBLIC UTILITIES COMMISSION

Ms. Luly Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

RE: Impact Telecom, LLC  
Switchless Reseller – Statement of Business Operations

Dear Ms. Massaro:

Enclosed for filing please find the original and four (4) copies of the Switchless Reseller – Statement of Business Operations submitted on behalf of Impact Telecom, LLC (“Company”).

The Company requests Confidential treatment of the financial statements included with this Application. These financial statements are provided under Seal marked “Confidential”. Please handle in accordance with the Commission’s normal procedures for handling of Confidential information.

*Also enclosed is a check in the amount of \$300 to cover the filing fee.*

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 470-672-3934 or via email to croesel@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

Carey Roesel  
Consultant

cc: Alex Valencia (Via E-Mail) - Lingo  
tms: Rli2300  
Enclosures  
CR/sp



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Enclosures  
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**BEFORE THE  
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**SWITCHLESS RESELLER - STATEMENT OF BUSINESS OPERATIONS**

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Impact Telecom, LLC ("Impact Telecom" or "Company"), a reseller of telecommunications services, hereby submits the following information in support of its registration for authority to provide interexchange resold telecommunications services within the State of Rhode Island:

**1. Company Information**

**a. The Company's full name and address is:**

Impact Telecom, LLC  
25925 Telegraph Road, Suite 210  
Southfield, MI 48033  
Telephone: 972-910-1900  
Facsimile: 866-418-9750  
Toll Free 866-557-8920

**b. The local company's full name and address is:**

Same as above

**c. Business locations**

The Company will not have a business location in Rhode Island. All Rhode Island operations will be centrally managed at the Company's Michigan location.

**d. Agent for service**

Corporation Service Company  
222 Jefferson Blvd, Suite 200  
Warwick RI 02888  
Telephone: 800-627-9800

**e. Attorney of Record**

Alex Valencia, Secretary and Chief Compliance Officer  
Impact Telecom, LLC  
25925 Telegraph Road, Suite 210  
Southfield, MI 48033  
Telephone: 972-910-1900  
Toll Free: 866-557-8920  
Email: alex.valencia@lingo.com

Contact for any questions about this Application:

Carey Roesel, Consultant to Impact Telecom, LLC  
Inteserra Consulting Group  
151 Southhall Lane, Suite 450  
Maitland, Florida 32751  
Telephone: 470-672-3964  
Facsimile: 407-740-0613  
E-mail: croesel@inteserra.com

**f. The Company's corporate officers and major stockholders**

The Company is a Limited Liability Company.

| Manager                                  | Address:  | Percent of Ownership |
|--|---|----------------------|
| Lingo Management, LLC<br>Managing Member | 25925 Telegraph Road, Suite 210<br>Southfield, MI 48033 | 100%                 |

Resumes of the Company's key management are provided in **Attachment I**.

**g. General Description of Operations**

Impact Telecom, LLC proposes to offer wholesale interexchange services to other carriers. The Company will use the services and facilities of its underlying carrier Verizon and other non-dominant carriers including Peerless, ANI Networks and Bandwidth.

**h. Description of the Company's customer service organization.**

The Company's customer care department will be open 24 hours per day, 7 days a week to handle any service, billing, or repair complaints. The Company's toll-free telephone number for customer inquiries, complaints and repair is 866-557-8920. Customers may contact the Company in writing at the headquarters address indicated below.

Impact Telecom, LLC  
25925 Telegraph Road, Suite 210  
Southfield, MI 48033  
[noc@impacttelecom.com](mailto:noc@impacttelecom.com)

**i. For customer service, the Company's contact is:**

Mary Hope, Regulatory Manager – Consumer Affairs  
Impact Telecom, LLC  
25925 Telegraph Road, Suite 210  
Southfield, MI 48033  
Toll Free: 866-557-8920  
Facsimile: 866-418-9750  
Email: regulatory@lingo.com

**j. For regulatory issues, the Company's contact is:**

**For ongoing operations and regulatory issues, please contact:**

Alex Valencia, Chief Compliance Officer  
Impact Telecom, LLC  
25925 Telegraph Road, Suite 210  
Southfield, MI 48033  
Telephone: 972-910-1900  
Toll Free: 866-557-8920  
Email: alex.valencia@lingo.com

**For correspondence concerning this application, please contact:**

Carey Roesel, Consultant to Impact Telecom, LLC  
Inteserra Consulting Group  
151 Southhall Lane, Suite 450  
Maitland, Florida 32751  
Telephone: 470-672-3964  
Facsimile: 407-740-0613  
E-mail: croesel@inteserra.com

**k. Company website address**

[www.lingo.com](http://www.lingo.com)

2. **Evidence of authorization from the Rhode Island Secretary of State.**

A copy of the Company's authorization is provided as **Attachment II**.

3. **Financial qualifications**

Impact Telecom is providing as **Attachment III**, the consolidated financial statements of its parent, Lingo Management, LLC, which demonstrate that the Company has sufficient resources to initiate operations and provide the services for which it seeks authority.

4. **Managerial Qualifications**

As illustrated in **Attachment I**, the key management of Impact Telecom has extensive experience in the telecommunications industry. The backgrounds of key management demonstrate that they possess the managerial qualifications required to provide the services for which the Company is seeking authority.

5. **Technical Qualifications**

As demonstrated by the resumes attached as **Attachment I**, the Company has the technical expertise to provide the services which it will be offering. Impact Telecom's services will satisfy the minimum standards established by the Commission.

6. **Existing Authority**

The Company is in the process of filing applications or registrations in all jurisdictions where approval or registration is required. Currently applications or registrations are pending in California, Connecticut, Kansas, Kentucky, Massachusetts, Minnesota, Nevada, and South Dakota.

7. **Tariffs**

Pursuant to Rhode Island General Laws §39-3-10, the Company, which will provide wholesale interexchange services to other carriers only, will operate on a detariffed basis. The Company does not provide services on a retail basis and all wholesale services are provided on a contract basis only.

Wherefore, Impact Telecom, LLC respectfully requests that the Rhode Island Public Utilities Commission grant Impact Telecom, LLC authority to operate as a reseller of interexchange telecommunications services throughout the State of Rhode Island and grant such other relief as it deems necessary and appropriate.

Respectfully submitted by:



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Alex Valencia  
Secretary and Chief Compliance Officer  
Impact Telecom, LLC  
25925 Telegraph Road, Suite 210  
Southfield, MI 48033  
alex.valencia@lingo.com

Dated: 12/22/2023

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Carey Roesel, Consultant to Impact Telecom, LLC  
Inteserra, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
croesel@inteserra.com

**IMPACT TELECOM, LLC**

**ATTACHMENT I**

**KEY MANAGEMENT RESUMES**



## **Impact Telecom, LLC Management Resumes**

### **Ananth Veluppillai, Chief Executive Officer**

Ananth Veluppillai serves as Chief Executive Officer in addition to being a member of its Board. Ananth also serves as the Chief Operating Officer of B. Riley Principal Investments (an owner of Impact Telecom). Ananth has over 28 years of experience in telecommunications and held various leadership positions, including serving as the COO of Global Operations for Tech Mahindra's Network Services unit and COO of LCC International, Inc., that provided consulting services in Wireless and Wireline telecommunication networks around the world. Ananth holds B.S. in Electrical Engineering from the University of Maryland at College Park.

### **Christine Tarrago, Chief Financial Officer**

Christine Tarrago is the Chief Financial Officer with more than 25 years of global financial executive leadership. Christine Tarrago has also served among others as CFO of private equity backed organizations. Before that, she had leadership positions at Siemens and Alstom. Originally from Europe, she graduated with a BA and MBA from the University of Augsburg, Germany, started her career in Europe where she worked in public accounting on large international publicly listed companies in Germany, France, and Spain. She is fluent in four languages and is a registered CPA in the State of Illinois.

### **Vilas Uchil, Chief Operating Officer**

Vilas Uchil is the Chief Operating Officer. In this capacity, he is responsible for overseeing innovation, technology, and operations. Prior to joining the team, Vilas worked in the telecommunications industry for 20 years. He was the head of engineering and operations at NovoLink Communications, and held positions at SPRINT-NEXTEL Corporation, General Electric Capital GCF (UK), and TATA-Nortel Technology Lab (India). He received a Bachelor of Engineering in electronics and telecommunication engineering from Bombay University (India), and he holds two Master of Science degrees from Missouri University of Science and Technology (electrical engineering/computer engineering).

### **Alex Valencia, Chief Compliance Officer**

Alex Valencia serves as the Chief Compliance Officer and is a 20+ year veteran of the telecom industry. Alex oversees the Company's government and legal affairs, including corporate governance and directs all regulatory policies. He holds an LLM in International and Comparative Law from Notre Dame Law School, a Juris Doctorate from Gonzaga University School of Law, and Bachelor of Arts degrees in Political Science and Latin America Studies from Southern Methodist University.

**Impact Telecom, LLC  
Management Resumes (Cont'd.)**

Christopher Ramsey, Chief Revenue Officer

Chris Ramsey serves as Chief Revenue Officer and is a 20+ year veteran of the communications services industry. He is responsible for managing and driving organic sales, sales operations, and marketing. Chris excels at managing multiple sales channels with an excellent track record of optimizing sales costs and ROI. Previously, Chris served as the SVP of Revenue at PuppySpot, and previously, as Chief Sales and Marketing Officer at Birch Communications. Chris holds a Bachelor of Arts Degree in Religious Education and Psychology from Southwest Baptist University.

Patrick Reilly, VP, Carrier Services

Patrick Reilly serves as VP of Carrier Services and is a 25+ year veteran of the telecom industry. Patrick has extensive senior-level experience managing Carrier sales, engineering and operational roles within the wireless and wireline space spanning domestic and international communications service offerings. Previously he held management and executive-level positions at Frontier Communications, Global Crossing, and ANI Networks.

**IMPACT TELECOM, LLC**

**ATTACHMENT II**

**RHODE ISLAND SECRETARY OF STATE AUTHORIZATION**



### Application for Transfer of Authority

RECEIVED  
 S.I. DEPT. OF STATE  
 BUS SVCS DIV

FOREIGN Business Corporation, Limited Partnership,  
 Limited Liability Company, Limited Liability Partnership or Non-Profit Corporation

2023 SEP 25 P 12:58



Pursuant to the applicable provisions of RIGL Title 7, the undersigned duly qualified foreign entity submits the following application for the purpose of transferring its authority to conduct business in the State of Rhode Island to:

|   |   |
|---|---|
| 1. Entity ID Number:<br>000702432   | 2. The full name of the entity filing this application is:<br>Impact Telecom, INC |
| 3. The applicant is a duly qualified foreign: (CHECK ONE BOX ONLY)  |   |
| <input type="checkbox"/> Limited Liability Company <input checked="" type="checkbox"/> Business Corporation <input type="checkbox"/> Non-Profit Corporation<br><input type="checkbox"/> Limited Partnership <input type="checkbox"/> Limited Liability Partnership  |   |
| 4. The applicant submits this application for the purpose of transferring its authority to a: (CHECK ONE BOX ONLY)  |   |
| <input checked="" type="checkbox"/> Limited Liability Company (RIGL <u>7-1.2-1411.1</u> ) <input type="checkbox"/> Business Corporation (RIGL <u>7-1.2-1411.1</u> )<br><input type="checkbox"/> Non-Profit Corporation (RIGL <u>7-6-80.1</u> ) <input type="checkbox"/> Limited Partnership or Limited Liability Limited Partnership (RIGL <u>7-13.1-1009</u> )<br><input type="checkbox"/> Limited Liability Partnership (RIGL <u>7-1.2-1411.1</u> )                                   |   |
| 5. The date the applicant qualified to conduct business in Rhode Island is: 08/25/2011  | 6. The jurisdiction upon transfer of authority is:<br>Nevada                      |
| 7. The name of the entity following the transfer of authority is: Impact Telecom, LLC   |   |
| 8. The application for transfer of authority is filed as an accompanying certificate to the: CHECK ONE BOX ONLY   |   |
| <input checked="" type="checkbox"/> Application for registration for a Limited Liability Company<br><input type="checkbox"/> Application for certificate of authority for a Business Corporation<br><input type="checkbox"/> Application for certificate of authority for a Non-Profit Corporation<br><input type="checkbox"/> Statement of registration for a Limited Partnership<br><input type="checkbox"/> Statement of registration for a registered Limited Liability Partnership |   |
| 9. This Transfer of Authority and applicable Application/Certificate/Notice must be accompanied by a Certificate of Good Standing/Legal Existence from the current jurisdiction of the entity.  |   |

**MAIL TO:**  
 Division of Business Services  
 148 W. River Street, Providence, Rhode Island 02904-2615  
 Phone: (401) 222-3040  
 Website: [www.sos.ri.gov](http://www.sos.ri.gov)

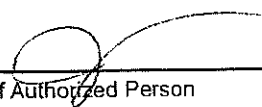
**10. TO BE COMPLETED BY THE ENTITY TRANSFERRING AUTHORITY**

*Under penalty of perjury, I/we declare and affirm that I/we have examined this Application for Transfer of Authority, including any accompanying attachments, and that all statements contained herein are true and correct and that the undersigned is authorized to sign this certificate on behalf of the entity set forth above.*

Type or Print Name of Limited Liability Company

Impact Telecom, LLC

Signature of Authorized Person



Date

9/22/23

Signature of Authorized Person

Date

Type or Print Name of Corporation

Impact Telecom, Inc.

Signature of Authorized Person

Date

Signature of Authorized Person

Date

Type or Print Name of Partnership

Signature of Partner

Date

Signature of Partner

Date

Signature of Partner

Date

Type or Print Name of Other Entity

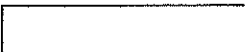
Signature of Authorized Person

Date

Signature of Authorized Person

Date

If you have any questions, please call us at (401) 222-3040, Monday through Friday, between 8:30 a.m. and 4:30 p.m., or email [corporations@sos.ri.gov](mailto:corporations@sos.ri.gov).



**Application for Registration**

FOREIGN Limited Liability Company

RECEIVED  
 R.I. DEPT. OF STATE  
 BUS SVCS DIV

→ Filing Fee: \$150.00

2023 SEP 25 P 12:58

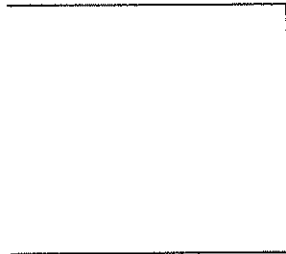
Pursuant to the provisions of RIGL ~~7-16-49~~, the undersigned foreign limited liability company hereby applies for a Certificate of Registration to transact business in the State of Rhode Island, and for that purpose submits the following statement:



|   |                       |                   |
|---|-----------------------|-------------------|
| 1. The name of the limited liability company is:  |                       |                   |
| Impact Telecom, LLC   |                       |                   |
| Is this company organized in its state or country of formation as a low-profit limited liability company? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |                       |                   |
| The name, if different, under which it proposes to register and transact business in Rhode Island is:   |                       |                   |
|   |                       |                   |
| 2. The LLC is organized under the laws of: Nevada   |                       |                   |
| 3. The date of its organization is: 05/25/2005  |                       |                   |
| And the period of its duration is: CHECK ONE BOX ONLY   |                       |                   |
| <input checked="" type="checkbox"/> Perpetual (on-going)  |                       |                   |
| <input type="checkbox"/> Date certain for dissolution _____   |                       |                   |
| 4. The name and address of the resident agent/office in Rhode Island is:  |                       |                   |
| Agent Name Corporation Service Company  |                       |                   |
| Street Address (NOT a P.O. Box)<br>222 Jefferson Boulevard., Suite 200  |                       |                   |
| City/Town<br>Warwick  | State<br>RHODE ISLAND | Zip Code<br>02888 |
| 5. The purpose or purposes which it proposes to pursue in the transaction of business in Rhode Island are:<br>Provider of Telecommunciation Services                          |                       |                   |
| Check the box to indicate an attachment <input type="checkbox"/>  |                       |                   |

**MAIL TO:**

Division of Business Services  
 148 W. River Street, Providence, Rhode Island 02904-2615  
 Phone: (401) 222-3040  
 Website: www.sos.ri.gov



6. The RI Department of State is appointed the agent of the foreign limited liability company for service of process if, at any time, there is no resident agent or if the resident agent cannot be found or served following the exercise of reasonable diligence.

7. The address of the office required to be maintained in the state or country of its organization by the laws of that state or, if not so required, of the principal office of the foreign limited liability company is:

25925 Telegraph Rd., Suite 210, Southfield, MI 48033

8. The mailing address for the limited liability company is:

25925 Telegraph Rd., Suite 210, Southfield, MI 48033

9. Management of the Limited Liability Company: **CHECK ONLY ONE BOX**

Members (Owners) **DO NOT** complete the chart below.

OR

Managers (Individuals hired by the members with no ownership interest) Complete the chart below.

| X | MANAGER NAME |  | ADDRESS |
|---|--------------|--|---------|
|   |              |  |         |
|   |              |  |         |

Check the box to indicate an attachment

10. This application must be accompanied by a Certificate of Good Standing/Letter of Status from the state or country of formation dated within 60 days of the date of filing.

11. Date when this application for Certificate of Registration will be effective: **CHECK ONE BOX ONLY**

Date received (Upon filing)

Later effective date (Date must be no more than 90 days from the date of filing) \_\_\_\_\_

*Under penalty of perjury, I declare and affirm that I have examined this Application for Registration, including any accompanying attachments, and that all statements contained herein are true and correct.*

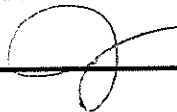
Type or Print Name of LLC

Impact Telecom, LLC

Date

9/22/23

Signature of Authorized Person



If you have any questions, please call us at (401) 222-3040, Monday through Friday, between 8:30 a.m. and 4:30 p.m., or email [corporations@sos.ri.gov](mailto:corporations@sos.ri.gov).

**IMPACT TELECOM, LLC**

**ATTACHMENT III**

**FINANCIAL INFORMATION**

Impact Telecom, LLC is providing the consolidated financial statements of its parent, Lingo Management, LLC, which demonstrate that the Company has sufficient resources to initiate operations and provide the services for which it seeks authority.

Financial statements are being provided under separate seal as Confidential.