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July 1, 2020

***Via IBFS***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Fusion Cloud Services, LLC Notice of *Pro Forma* Transaction;  
(ITC-214-19971001-00592)

Dear Ms. Dortch:

Fusion Cloud Services, LLC (“Fusion Cloud”) hereby notifies the Federal Communications Commission (“Commission”), pursuant to Section 63.24(f) of the Commission’s rules, that on June 1, 2020, Fusion Cloud, Fusion Telecom of Missouri, LLC (“Fusion Missouri”) and Fusion Telecom of Oklahoma, LLC (“Fusion Oklahoma”),<sup>1</sup> completed *pro forma* transfers of customer bases and operating assets.

In an effort to improve corporate operating efficiencies and achieve a streamlined corporate structure, effective June 1, 2020, Fusion Cloud acquired the customer bases and operating assets of its wholly-owned subsidiaries, Fusion Missouri and Fusion Oklahoma (the “Transaction”).<sup>2</sup> Accordingly, the Transaction is *pro forma* as there was no change in ultimate ownership or control of the operating assets or customer bases of Fusion Missouri or Fusion

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<sup>1</sup> Fusion Cloud, Fusion Missouri, and Fusion Oklahoma are wholly-owned subsidiaries of Fusion Connect, Inc. (“Fusion Connect”) that operated, and in the case of Fusion Cloud, continue to operate, pursuant to Fusion Connect’s international Section 214 authority.

<sup>2</sup> In accordance with Commission rule 47 C.F.R. § 64.1120(e), customers were notified of the Transaction and the requisite filing was made with the Commission on April 30, 2020. See Letters to Marlene H Dortch, Secretary, Federal Communications Commission, from Winafred Brantl, Kelley Drye & Warren LLP, External Counsel to Fusion Telecom of Missouri, LLC and Fusion Telecom of Oklahoma, LLC, CC Dkt. 00-257 (April 30, 2020).

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Oklahoma. Post-Transaction, each of Fusion Missouri and Fusion Oklahoma remain in existence but are inactive, do not provide any intrastate, interstate, or international telecommunications, and will be dissolved on December 31, 2020. Attached are charts depicting the pre- and post-Transaction organizational structure.

A certification, as required pursuant to 47 C.F. R. § 63.24(f)(2)(ii), is appended.

In support of this filing, Fusion Cloud provides the following information required by Commission Rules 63.24(f)(2):

- (a) The contact name, address, and telephone number of the assignee:

Fusion Cloud Services, LLC  
210 Interstate North Parkway  
Suite 300  
Atlanta, GA 30339  
Tel: (212) 201-2425

- (b) Fusion Cloud Services, LLC is a Georgia limited liability company.  
(c) Correspondence concerning this *pro forma* notice should be directed to:

Denise N. Smith  
Winafred Brantl  
Kelley Drye & Warren, LLP  
3050 K St., NW, Suite 400  
Washington, D.C. 20007  
Tel: (202) 342-8614 (Smith)  
(202) 945-6649 (Brantl)  
Fax: (202) 342-8451  
Email: [dsmith@kelleydrye.com](mailto:dsmith@kelleydrye.com)  
[wbrantl@kelleydrye.com](mailto:wbrantl@kelleydrye.com)

- (d) Fusion Cloud holds blanket domestic Section 214 authority<sup>3</sup> and, pursuant to Section 63.21(h) of the Commission's Rules, operates pursuant to the international Section 214

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<sup>3</sup> 47 C.F.R. §63.01.

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authorization (IB File No. ITC-214-19971001-00592) held by its parent company, Fusion Connect, Inc.<sup>4</sup>

- (h) The following individuals and entities hold ten percent (10%) or more of the direct or indirect interests in Fusion Cloud:

Fusion Connect  
210 Interstate North Parkway, Suite 300  
Atlanta, GA 30339  
Citizenship: Delaware  
Principal Business: Holding Company  
Percentage Interest: 100% direct interest

Telecom Holdings LLC  
1 Market Street  
Steuart Tower, 23<sup>rd</sup> Floor  
San Francisco, CA 94105  
Citizenship: Delaware  
Principal Business: Holding Company  
Percentage Interest: 100% (Attribution, through 65% direct interest in Fusion Connect)

No other entity or individual holds a 10% or greater direct or indirect equity or voting interest in Fusion Cloud.

#### Interlocking Directorates

Fusion Cloud is a commonly-owned affiliate of Primus Management ULC (“Primus”), a British Columbia unlimited liability company authorized to provide local exchange, long distance, and Internet access services in Canada.

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<sup>4</sup> See *Fusion Connect, Inc. - FCC File No. ITC-214-19971001-00592, Letter Pursuant to Section 63.21(h)* (filed May 31, 2018); See also *Fusion Connect, Inc. - FCC File No. ITC-214-19971001-00592, Letter Pursuant to Section 63.21(i)* (filed February 8, 2019) (identifying Fusion Cloud name change). Fusion Missouri and Fusion Oklahoma each held blanket domestic Section 214 authority and, pursuant to Section 63.21(h) of the Commission’s Rules, operated pursuant to Fusion Connect’s international Section 214 authorization. See *Fusion Connect, Inc. - FCC File No. ITC-214-19971001-00592, Letter Pursuant to Section 63.21(h)* (filed June 1, 2018); See also *Fusion Connect, Inc. - FCC File No. ITC-214-19971001-00592, Letter Pursuant to Section 63.21(i)* (filed February 8, 2019) (identifying Fusion Missouri and Fusion Oklahoma name changes).

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The following individuals serve in the identified officer or director positions for both Fusion Cloud and Primus.

<b>Name</b>	<b>Title</b>
Brian Crotty	Chief Executive Officer
Kevin Brand	President and Chief Operating Officer
Mario DeRiggi	Chief Revenue Officer
Keith A. Soldan	Chief Financial Officer and Chief Accounting Officer; Manager
James P. Prenetta, Jr.	Executive Vice President, General Counsel and Corporate Secretary; Manager
Brian George	Chief Technology Officer
Joseph Haines	Senior Vice President, Operations
Tadashi Egami	Senior Vice President, Marketing, Account Management and Sales Enablement
Michael Fair	Senior Vice President, Channel Sales
Diane Hutcherson	Vice President, Direct Sales
Brian Balog	Vice President, Finance
Richard Zertuche	Vice President, Corporate Controller
Birch Blair	Vice President, Deputy General Counsel and Assistant Secretary
Pamela Hintz	Vice President, Regulatory Compliance
Kelli Pruet	Vice President, Tax
Rod Brownridge	Vice President, Customer Support
Doug Gillespie	Vice President, Voice Engineering
Shane Smith	Vice President, System Engineering
Tim Gallagher	Vice President, Engineering and Planning
Katia Goforth	Vice President, Engineering and Planning
Tasha Cornali	Vice President, Service Assurance
Vicki Spehar	Vice President, Customer Experience

James P. Prenetta and Keith Soldan are

- Managers of the Fusion Connect subsidiaries that are limited liability companies
- Directors of the Fusion Connect subsidiaries that are corporations
- Directors of Primus

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Please contact the undersigned counsel should there be any questions regarding this matter.

Respectfully submitted,

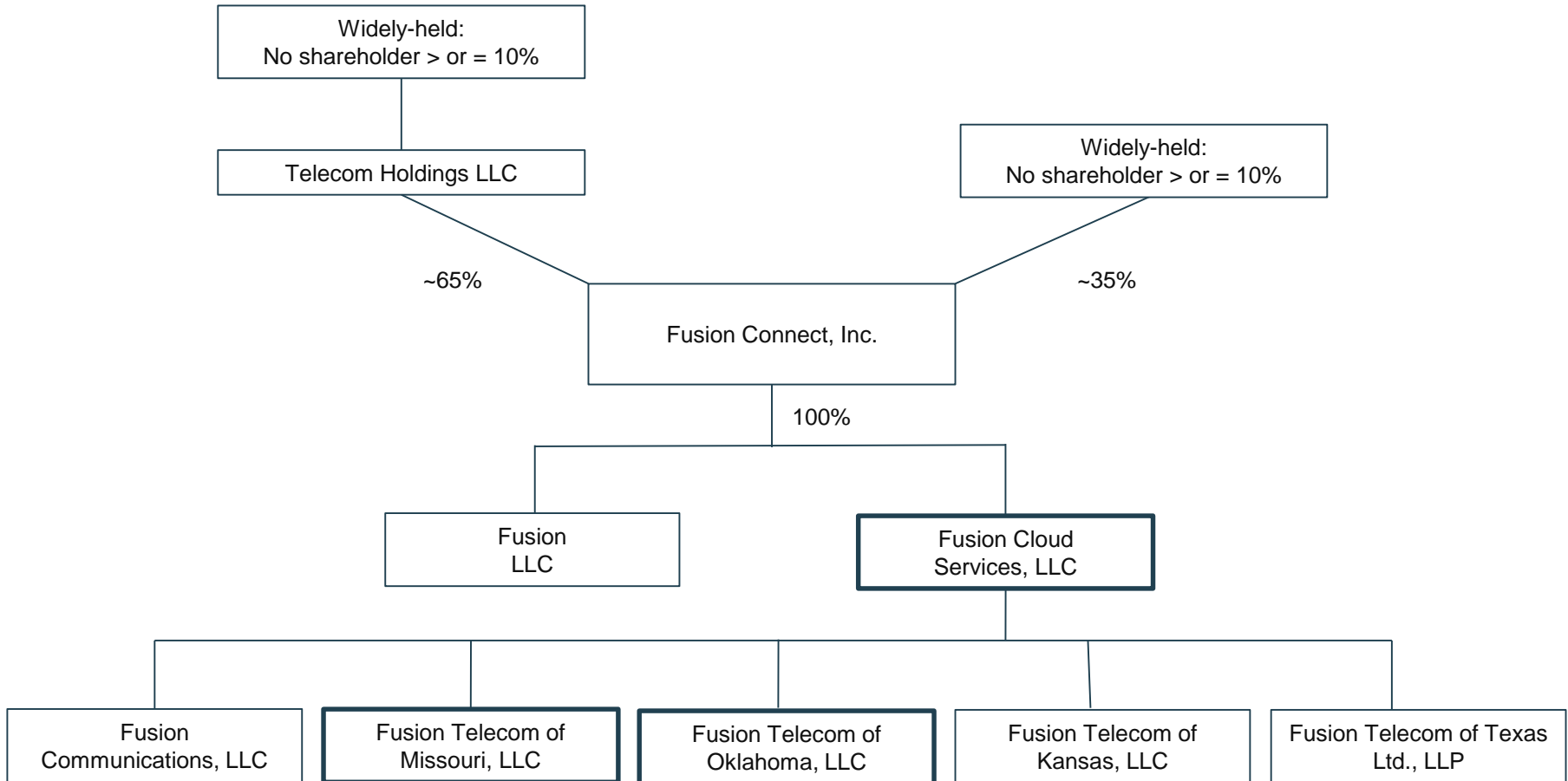


Denise N. Smith  
Winafred Brantl  
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3050 K Street, NW  
Suite 400  
Washington, D.C. 20007

*Counsel for Fusion Cloud Services, LLC,  
Fusion Telecom of Missouri LLC and Fusion  
Telecom of Oklahoma, LLC*

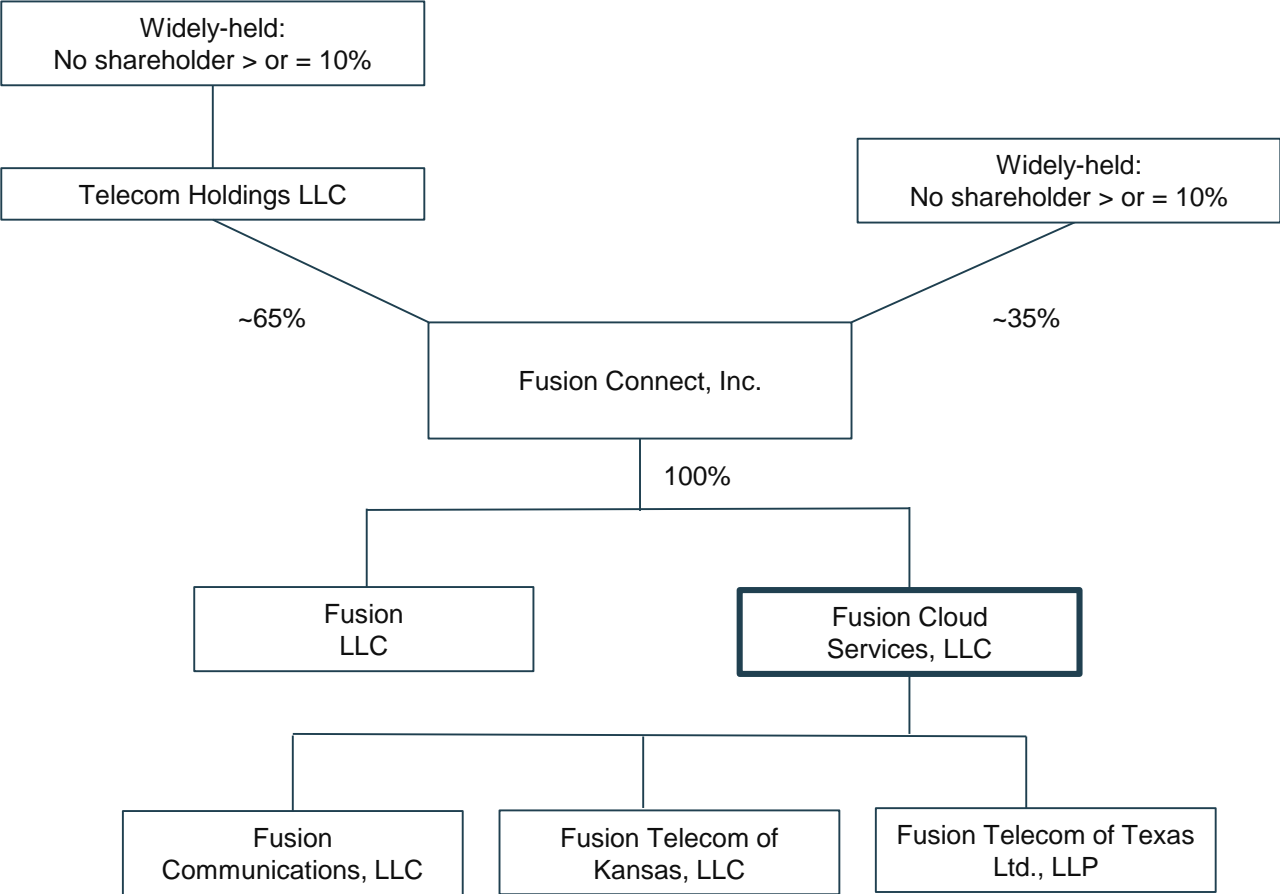
**Pre- and Post-Pro Forma Transaction  
Organizational Charts**

# Pre-Pro Forma Transaction



\* Chart includes only Fusion Connect, Inc. subsidiaries holding or operating under a parent company's Section 214 authority

# Post-Pro Forma Transaction



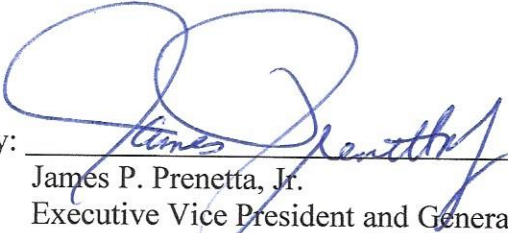
\* Chart includes only Fusion Connect, Inc. subsidiaries holding or operating under a parent company's Section 214 authority.



## Certification

The undersigned hereby certifies, on behalf of Fusion Cloud Services, LLC, and with respect to the foregoing notification of a *pro forma* transaction, that the statements in the notification are true and correct to the best of my belief and are made in good faith; that the transaction was *pro forma* as described in Sections 63.24(d) of the Commission's Rules; and that this transaction, together with all previous *pro forma* transactions, did not result in a change in ultimate control.

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

  
James P. Prenetta, Jr.  
Executive Vice President and General Counsel  
Fusion Connect, Inc.

Date: June 30, 2020