



Filing Receipt

Received - 2022-04-04 01:37:23 PM
Control Number - 53233
ItemNumber - 9

Affidavit of Derek Larson

State of Oregon

County of Hood River

Derek Larson, being duly sworn deposes and states as follows under penalty of perjury:

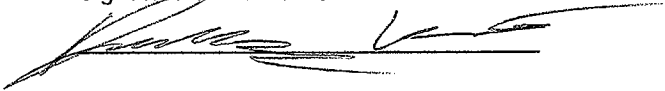
1. My name is Derek Larson, I am presently 33 years old, and my current address of residence is 3982 Neal Creek Rd, Hood River, Oregon 97031.
2. The purpose of this Affidavit is to Address requirements from the State of Texas Public Utility Commission regarding Draupnir Infrastructure Group, LLC's application for Certificate of Operating Authority.
3. I attest that Draupnir Infrastructure Group, LLC will comply with the financial requirements of 16 TAC § 26.111(f)(2), and that it is able to comply with the financial requirements of 16 TAC § 26.111(f)(2). I also attest to the accuracy and veracity of the financial statements for its most recent fiscal quarter.

I hereby swear or affirm that the information above is true accurate and complete to the best of my knowledge, and that no relevant information has been omitted.

Dated:

3/31/2022

Signature of Individual:



Notary Public

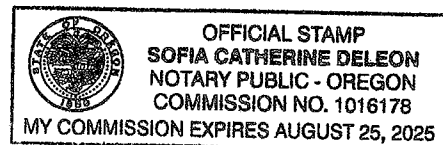


Title And Rank

NOTARY PUBLIC

Date Of Commission Expiry

08/25/2025



**Supplemental Information Regarding Application for Certificate of Authority
Competitive Supplier of Telecommunication Service – Public Utilities
Commission of Texas – Docket No. 53233**

Deficiency & Completeness Memorandum, dated 3/4/2022

- 1 Applicant (Draupnir Infrastructure Group, LLC) has since secured a Texas Comptroller Number and this number is 32082901474. The amended application also reflects this as requested, and is submitted along with this narrative.
- 2 These questions have been answered in more detail, and the application has been amended to reflect these answers.
- 3 This question has been updated to reflect all managers in the LLC, their supporting resumes are attached as well as supporting documentation.

**Sufficiency Recommendation, Regarding Completeness of Application from a
Financial Perspective, dated 3/4/2022**

- 1 Financial information has been updated to reflect the shareholders equity as requested.
- 2 This requirement is understood and acknowledged by applicant.
- 3 As the company was created in January 2022, the first quarter of the company's finances have just been completed and have been revised to meet the requirements requested. Please see the attached financial balance sheet.
- 4 The structure of Draupnir, LLC (operating in Washington), and Draupnir Infrastructure Group, LLC are identical in ownership and management structure. Both organizations are member managed LLC's. If ownership equity amounts are required to be disclosed for each member, please advise and I will disclose that information.

Derek Larson, Managing Member.

Lach Litwer, Managing Member.

Mike Craig, Managing Member.

Craig Brunkenhoefer, Managing Member.

- 5 An affidavit attesting that Draupnir Infrastructure Group, LLC will comply with the financial requirements of 16 TAC § 26.111(f)(2), and that it is able to comply with the financial requirements of 16 TAC § 26.111(f)(2) as well as attesting to the accuracy and veracity of the financial statements for its most recent fiscal quarter is attached as requested. If the original notarized document is required, please advise and I will mail it



Public Utility Commission of Texas

INSTRUCTIONS FOR THE APPLICATION OR AMENDMENT OF A SERVICE PROVIDER CERTIFICATE OF OPERATING AUTHORITY OR A CERTIFICATE OF OPERATING AUTHORITY

A **sworn** application should be submitted to:

Central Records Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7180

An Application consists of a title page, an affidavit, and the required, properly completed questions. The Applicant shall also file the Application electronically as directed by the Commission's Procedural Rules, which can be found on the Commission's web site. **Seven copies (an original and six copies) of the Application** should be submitted and should meet the following requirements:

- The original copy shall not be hole punched, tabbed, bound or stapled.
- Each of the six copies should be three-hole punched with a tab before each numbered question and response.
- The docket/project number (if known) should appear on the Title Page and the Applicant's name and a page number should appear on each page of the Application.

All responses to questions shall be in a truthful manner. The Applicant must promptly amend the SPCOA or the COA when substantive changes occur by filing **seven copies (an original and six copies) of the amendment** with Central Records in the established docket.

If the Application information is not subject to disclosure under Government Code §552.001 *et seq.*, the Applicant may label that information confidential and file it in accordance with Procedural Rule §22.71(d); citing the applicable provisions of the Government Code. If you have any questions concerning the filing of confidential information, contact Central Records (512) 936-7180.

This Application is a multipurpose application. The Applicant may file for multiple amendments within the same application. **All Questions listed in the "Update Responses as Necessary" column must be responded to with either updated detailed information or "NO CHANGE".** In your Application, **delete** all application questions **not listed as necessary for in one of the two columns below.** (See Chart below).

This Application is a format, not a form, so add or drop spaces and lines as needed. Attachments must be labeled. Please keep attachments to a minimum, providing the responses directly below the question as much as possible. Failure to provide a complete, truthful, or responsive answer to any question may result in a denial or a delay in the processing of the Application. Do not file these instructions with this Application.

Application Type	Required Responses	Update Responses as Necessary
New SPCOA Application	Title Page (TP), Affidavit (AF) 1–17	
New COA Application	TP, AF, 1–10, & 12–17	
Re-Qualification SPCOA Application	TP, AF, 1–17	
Re-Qualification COA Application	TP, AF, 1–10, & 12–17	
Name Change Amendment	TP, AF, 1, 2(a, b, c, e, h, i), 3, & 13	2(d, f, g)
Certification Relinquishment	TP, AF, 1, 2(a, b, c, e, h, i), 3, 13, & 18-21	
Change in Ownership / Control	TP, AF, 1, 2(a, b, c, e, f, g, h, i), 13, 14, 16, & 17	2(d) & 3–12, & 15
Change in Ownership between Two Existing SPCOA/COA Holders	TP, AF, 1, 2(a, b, c, e, h, i), 3, & 13	TP, AF, 1 - 17 as Directed
Change in Service Area	TP, AF, 1, 2(a, b, c, e, h, i), 7, 13, 14, 16, & 17	2(d, f, g), 3–6, & 8–12, & 15
Service Discontinuation	TP, AF, 1, 2(a, b, c, e, h, i), 3, 13, & 18	
Change in Type of Provider	TP, AF, 1, 2(a, b, c, e, f, g, h, i), 4-6, 13, 14, 16, & 17	3 & 7–12, & 15
Corporate Restructuring	TP, AF, 1, 2(a, b, c, e, f, g, h, i), 13, 14, 16, 17	2(d), & 3–12, & 15



Public Utility Commission of Texas

1701 N. Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326
512 / 936-7000 • (Fax) 936-7003
Web Site: www.puc.state.tx.us

TITLE PAGE

APPLICATION FOR CERTIFICATION, RE-QUALIFICATION, OR AMENDMENT TO A SERVICE PROVIDER CERTIFICATE OF OPERATING AUTHORITY OR A CERTIFICATE OF OPERATING AUTHORITY

DOCKET/PROJECT NO. _____

APPLICANT(s): 1. Draupnir Infrastructure Group, LLC
2. _____

Authorized Representative for this Application:

NAME: Derek Larson
TITLE: Managing Member
ADDRESS: 3982 Neal Creek Rd. Hood River, OR 97031
TELEPHONE: 541-806-4484
FAX: N/A
EMAIL ADDRESS: Derek@draupnir.us

Regulatory Representative:

NAME: Derek Larson
TITLE: Managing Member
ADDRESS: 3982 Neal Creek Rd. Hood River, OR 97031
TELEPHONE: 541-806-4484
FAX: N/A
EMAIL ADDRESS: Derek@draupnir.us

Complaint Representative:

NAME: Derek Larson
TITLE: Managing Member
ADDRESS: 3982 Neal Creek Rd. Hood River, OR 97031
TELEPHONE: 541-806-4484
FAX: N/A
EMAIL ADDRESS: Derek@draupnir.us

AFFIDAVIT

STATE OF _____ §
COUNTY OF _____ §

1. My name is Derek Larson. I am the managing member of the Applicant Draupnir Infrastructure Group, LLC.

2. I swear or affirm that I have personal knowledge of the facts stated in this Application for a Service Provider Certificate of Operating Authority or a Certificate of Operating Authority (Select one), that I am competent to testify to them, and that I have the authority to make this Application on behalf of the Applicant. I further swear or affirm that all of the statements and representations made in this Application for a Service Provider Certificate of Operating Authority or a Certificate of Operating Authority (Select one) are true and correct. I swear or affirm that the Applicant understands and will comply with all requirements of law applicable to a Service Provider Certificate of Operating Authority or a Certificate of Operating Authority (Select one).

Signature

Derek Larson, Managing Member
Typed or Printed Name

SWORN TO AND SUBSCRIBED before me on the day of , 20 .

Notary Public In and For the
State of

My commission expires: _____

1. Check only one of the following Requests:

(a)

_____ New SPCOA Application

_____ Application

Amending SPCOA No. _____

X New COA Application

_____ Application

Amending COA No. _____

(b) If you are filing an amendment, check one or more of the following as requests made in this amendment filing:

_____ Name Change Amendment

_____ Certification Relinquishment

_____ Change in Ownership/Control

_____ Service Discontinuation

_____ Change in Service Area

_____ Change in Type of Provider

_____ Corporate Restructuring

_____ Other

(c) Provide a summary explanation of all items checked in “b” above.

2. Provide a description of the Applicant, which shall include the following:

(a) Legal name and all assumed names under which the Applicant conducts business, if any;

Draupnir Infrastructure Group, LLC

(b) Address of principal office and business office;

3982 Neal Creek Rd. Hood River, OR 97031

(c) Principal office/business office telephone number: **541-806-4484**

Fax number: **None**

Website address: **www.draupnir.us**

E-mail address: **Derek@draupnir.us**

Toll-free customer service telephone number. *(If the Applicant has not obtained the toll-free customer service telephone number at the time of the Application, the Applicant must commit to obtaining one before beginning business);* **Applicant commits to obtaining one before beginning business.**

(d) FCC Carrier Identification Code (CIC) or National Exchange Carriers Association (NECA) Operating Carrier Numbers (OCNs), if available; **Not available at this time.**

(e) Form of business in Texas (e.g., corporation, partnership, sole proprietorship), Charter/Authorization number, date business was formed and date change was made (if applicable). Provide the State and date in which the parent company is registered. *(The Commission requires registration with the Secretary of State for*

all forms of business, except sole proprietorships.) Draupnir Infrastructure Group LLC was formed on 1/20/2022. Registration with the state of Texas was granted on 2/1/2022.

- (f) A list of the names, titles, phone number and office e-mail address of each director, officer, or partner;

Derek Larson – 3982 Neal Creek Rd. Hood River, OR 97031
Lach Litwer – 2204 Sherman Ave. Hood River, OR 97031
Mike Craig – 38491 S Nowlens Bridge Rd. Molalla, OR 97038
Craig Brunkenhoefer – 11044 SW Davos Ln. Wilsonville, OR 97070

- (g) Name, address, and office address of each of the five largest shareholders, if not publicly traded;

Derek Larson – 3982 Neal Creek Rd. Hood River, OR 97031
Lach Litwer – 2204 Sherman Ave. Hood River, OR 97031
Mike Craig – 38491 S Nowlens Bridge Rd. Molalla, OR 97038
Craig Brunkenhoefer – 11044 SW Davos Ln. Wilsonville, OR 97070

- (h) Legal name of parent company, if any, and a description of its primary business interests; and,

N/A

- (i) Legal name of all affiliated companies that are public utilities or that are providing telecommunications services and the states in which they are providing service. Give a description of all affiliates and explain in detail the relationship between the Applicant and its affiliates. An organizational chart should be provided, if available.

Draupnir, LLC – Operating in Washington

3. State the name **and only one name**, in which the Applicant wants the Commission to issue its certificate. Provide the following information from the Applicants registration with the Office of the Secretary of State of Texas or registration with another state or county, as applicable: *(NOTE: If the Applicant is a corporation, the Commission will issue the certificate in either the Applicant's corporate or assumed name, not both. The certificate holder must use only the name approved by the Commission on all bills and advertisements sent to or viewed by the public. Name Changes require Commission Approval as well as Secretary of State Approval.)*
- (a) Requested name: **Draupnir Infrastructure Group, LLC**
- (b) Assumed names: **Draupnir**
- (c) Texas Secretary of State (or County) file number: **804405946**
- (d) Texas Comptroller's Tax Identification number: **32082901474**

- (e) Other Applicable certification/file numbers:
 (f) Date the business was registered:

1/20/2022

4. (a) Provide a detailed description of the telecommunications services to be provided.

Drapnir Infrastructure Group, LLC seeks to operate as a telecommunications service provider within the state of Texas. Applicant seeks to build and own telecommunications infrastructure and act as a middle mile service provider exclusively. Applicant will not provide end user service, only dark and lit fiber circuits between other telecommunications service providers or large enterprise customers.

- (b) Indicate with a yes or no response for each item below, whether the Applicant will be providing the following telecommunications services and whether the service will be for business or residential service:

	Business	Residential
<input type="checkbox"/> POTS (Plain Old Telephone Service)	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> ADSL	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> ISDN	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> HDSL	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> SDSL	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> RADSL	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> VDSL	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> Optical Services	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> T1-Private Line	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> Switch 56 KBPS (KiloBits Per Second)	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> Frame Relay	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> Fractional T1	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> Long Distance	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>
<input type="checkbox"/> Wireless	<input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/>

☐ Other (Please Describe): **Applicant seeks to build and own telecommunications infrastructure and act as a middle mile service provider exclusively. Applicant will not provide end user service, only dark and lit fiber circuits between other telecommunications service providers or large enterprise customers.**

5. (a) Is the Applicant providing prepaid calling services?

No

- (b) If yes to (a), provide a yes or no response to the list of telecommunications services below:

☐ Residential Prepaid Local Calling Services
☐ Business Prepaid Local Calling Services
☐ Residential Prepaid Domestic Long Distance Calling Services
☐ Business Prepaid Domestic Long Distance Calling Services
☐ Residential Prepaid International Long Distance Calling Services
☐ Business Prepaid International Long Distance Calling Services

6. (a) Indicate below the type of certification being requested:

☒ Facilities-based, Data, and Resale
☐ Facilities-based and Resale
☐ Resale Only
☐ Data Only – Facilities-based and Resale
☐ Data Only – Resale Only

7. Provide a written description of the exchanges, local access and transportation areas (LATAs), or incumbent local exchange company (ILEC) service areas or attach a scaled map of the geographic area for which the certificate is requested within the State of Texas that the Applicant proposes to serve.

Applicant seeks permission to operate statewide through the state of Texas. However, at this time Applicant seeks to operate within large urban areas, not limited to but including Austin, San Antonio, and the greater Dallas area. At this time, network design is preliminary and no scale maps exist. Once permission is granted by the state to operate a CLEC, applicant will begin field engineering the conceptual network that is proposed in these areas.

8. Does the Applicant, owner, or any affiliate currently hold a service provider certificate of operating authority (SPCOA), certificate of operating authority (COA), or certificate of convenience and necessity (CCN) for any part of the area covered by this Application?

No

9. (a) Does the Applicant expect to provide service to customers other than itself and its affiliates?

Yes

- (b) Has the Applicant provided one copy of this Application to the Texas Commission on State Emergency Communications (a.k.a. 911 Commission) within 5 days of submitting the application? If you are relinquishing the certificate have you also sent a copy of the application to all affected 911 entities within 5 days of submitting the application?

(Send copy to Commission on State Emergency Communications, Office of General Counsel at 333 Guadalupe Street, Suite 2-212, Austin, Texas 78701-

3942, with phone number 512-305-6911, fax number 512-305-6937, and website address www.911.state.tx.us).

Yes, a copy has been provided to the Texas Commission on State Emergency Communications

- (c) As part of the Application provided to the 911 Commission and this commission, has the applicant provided the following information concerning its 911 contact person as required in Substantive Rule No. 26.433(e)(2)(a)? (You may provide up to three 911 contacts per company)

Name: Derek Larson
Title: Managing Member
Address: 3982 Neal Creek Rd. Hood River, OR 97031
Office Number: 541-806-4484
Fax Number (Optional): _____
Email Address: Derek@draupnir.us

10. (a) Is the Applicant a municipality?

No

- (c) Will the Applicant enable a municipality or municipal electric system to offer for sale to the public, directly or indirectly, local exchange telephone service, basic local telecommunications service, switched access service, or any non-switched telecommunications service used to provide connections between customers' premises within an exchange or between a customer's premises and a long distance provider serving the exchange?

If so desired by a jurisdiction, yes.

12. (a) Has the Applicant, its owners, or any affiliate applied for a permit, license, or certificate to provide telecommunications services in any state other than Texas? If yes, identify the affiliates, what permit, license, or certificate they have applied for, and the state(s) in which they have applied.

Yes, Draupnir, LLC (affiliate but separate company) was granted CLEC status by the state of Washington on 10/1/2021.

- (b) Has the Applicant, its owners, or any affiliate ever had a permit, license, or certificate to provide telecommunications services granted by any state, including Texas? If yes, identify the affiliates, what permit, license, or certificate they have and when they were held and the state(s) in which they are held. Provide an explanation.

Yes, Draupnir, LLC (affiliate but separate company) was granted CLEC status by the state of Washington on 10/1/2021.

- (c) Has the Applicant, its owners, or any affiliate ever had any permit, license, or certificate denied or revoked by any state? If yes, identify the affiliates, what permit, license, or certificate they had revoked, and the state(s) in which they were revoked. Provide an explanation.

No

- (d) Has the Applicant, its owners, or any affiliate ever provided telecommunications services in Texas or any other state? If yes, identify the affiliates, what permit, license, or certificate they may have held, and the state(s) in which they provided service.

Yes, Yes, Draupnir, LLC (affiliate but separate company) was granted CLEC status by the state of Washington on 10/1/2021. Draupnir, LLC is still active and providing services.

13. (a) Any complaint history, disciplinary record and compliance record during the 60 months immediately preceding the filing of the application regarding: the applicant; the applicant's affiliates that provide utility-like services such as telecommunications, electric, gas, water, or cable service; the applicant's principals; and any person that merged with any of the preceding persons. The information should include, but not be limited to, the type of complaint, in which state or federal agency the complaint was made, the status of the complaint, the resolution of the complaint and the number of customers in each state where complaints occurred.

Applicant is a new company formed in January of 2022, and no complaints have been filed since its creation. Furthermore, there have been no complaints made against any managers of the LLC in other related or unrelated businesses of this nature.

- (b) Is the Applicant, or the applicant's principals currently under investigation or have the Applicant or its principals been penalized by an attorney general or any state or federal regulatory agency for the violation of any deceptive trade or consumer protection law or regulation? If yes, please explain.

No.

- (c) Disclose whether any owners, directors, officers, or partners in the organization are convicted felons? Also disclose whether the applicant or applicant's principals have been convicted or found liable for fraud, theft, larceny, deceit, or

violations of any securities laws, customer protection laws, or deceptive trade laws in any state. If yes, please explain.

Craig Brunkenhoefer, a minority equity holder in Draupnir Infrastructure Group, LLC was convicted of felony credit card abuse. Our response regarding Craig Brunkenhoefer is as follows:

“In 1988, while living on my own, I made unauthorized charges on my father’s credit card. I notified him of these charges and planned to pay him restitution. Upon failing to comply with the predetermined payment schedule, my father had me prosecuted for felony credit card abuse, and I was given 36 months of deferred adjudication probation. This probation was terminated in 1991.

Subsequently, in 1990, while living in Austin with what I thought were some friends, I was asked to go to Babbage’s store to pick up a Sega Genesis console for my friend, who allegedly received this from his parents for his birthday. Upon arrival at the store, I was arrested and charged with credit card abuse as the card used to purchase the game system for my “friend” was reported stolen. I was given five years of probation. This probation was terminated in 1996.”

No other officers, members, directors, or owner have been convicted of a felony.

- (d) Provide the number of customers per state (including Texas) for the past 60 months, for which the Applicant, its parent company, and/or any affiliates are providing telecommunications services.

Draupnir Infrastructure Group, LLC is a new company being formed and currently has no customers yet. Construction and regulatory activities are underway.

- 14. (a) Provide a detailed description of the Applicant's technical qualifications to provide the local exchange service, basic local telecommunications service, and/or switched access service proposed in this Application.

Draupnir Infrastructure Group LLC is comprised of leading telecommunications, construction, business, and legal professionals within decades of combined experience in the industry. “Draupnir” is currently operating this business in other states, and expanding into other states to continue growing the business. Derek Larson will be the managing member who has a masters degree in business administration (MBA), has a project management professional (PMP) certification from the Project Management Institute (PMI), and have over 15 years in the telecommunications industry

in multiple states across the western United States. Draupnir is already operating this business model in other states and jurisdictions.

- (b) If the Applicant plans to rely upon a consultant to meet the technical qualifications requirements, provide the following information: (1) name, address, and phone number of consultant, (2) a copy of the contract between the principals and the consultant, (3) consultant's resume or a detailed description of the consultants experience, (4) information regarding any professional registrations or certifications that the consultant holds, (5) percentage of the consultant's time being contracted, and (6) a list of other telecommunications companies served by the consultant and the percentage of time allotted to each company.

Applicant has no intention to rely upon a consultant or consulting firm to meet the technical requirements to operate an internet service provider network and associated business.

- (c) Provide a detailed description or individual resumes setting forth the qualifications of the Applicant's key personnel. Descriptions or resumes shall include (1) **Key Personnel Names**, (2) **Applicant Company Titles**, (3) **Detailed Telecommunications or Related Experience**, and (4) **Years of Experience**.

Derek Larson, Managing Member, resume attached.

Lach Litwer, Managing Member, resume attached.

Mike Craig, Managing Member, resume attached.

Craig Brunkenhoefer, Managing Member, resume attached.

- 15. Attach a completed Service Quality Questionnaire.

See the attached questionnaire, as requested.

- 16. Provide an audited or unaudited balance sheet for the applicants most recent quarter that demonstrates the shareholders' equity required by P.U.C. Subst. R. 26.111(f). The audited balance sheet must include the independent auditor's report. The unaudited balance sheet must include a sworn statement from the executive officer of the applicant attesting to the accuracy, in all material respects, of the information provided in the unaudited balance sheet.

See the attached financial information as requested.

- 17. Provide a summary of any history of insolvency, bankruptcy, dissolution, merger or acquisition of the applicant or any predecessors in interest during the 60 month immediately preceding this Application.

Not applicable.

SERVICE QUALITY QUESTIONNAIRE for SPCOA and COA Applicants as required in Question number 15.

Will the Applicant meet each of the following benchmark service quality standards listed below?
For each "NO" response, please provide an explanation.

YES ☐ NO ☒ Make one-party line service available upon request to all subscribers of local exchange service.

YES ☐ NO ☒ Install 95% of primary service orders and 90% of regular service orders within five working days of customer orders, excluding those orders where a later date is requested by the customer.

YES ☒ NO ☐ Meet 90% of commitments to customers regarding the date of installation of service orders, excepting customer-caused delays.

YES ☒ NO ☐ Maintain the level of held regrade orders (as defined in Substantive Rule 26.54) at or below one percent of access lines served.

YES ☒ NO ☐ Answer 85% of toll and assistance operator calls within ten seconds.

YES ☒ NO ☐ Answer 90% of repair service calls and calls to business offices within 20 seconds.

YES ☒ NO ☐ Provide dial tone within 3 seconds for 98% of calls.

YES ☒ NO ☐ Maintain an availability factor for stored program controlled digital and analog switching facilities (local intra-office) at 99.99%, or keep total unscheduled outages below 53 minutes per year.

YES ☒ NO ☐ Maintain an availability factor for stored program controlled digital and analog switching facilities (local inter-office) at 99.93%, or keep total unscheduled outages below 365 minutes per year.

YES ☒ NO ☐ Complete 97% of properly dialed tolled calls without encountering failure because of blockages or equipment irregularities.

YES ☒ NO ☐ Maintain an average monthly rate of customer trouble reports, excluding CPE reports, at or below 6%.

YES ☒ NO ☐ Clear 90% of out-of-service trouble reports within 8 working hours, except where access to the customer's premises is required and not available or

where interruptions are caused by unavoidable casualties and acts of God affecting large groups of customers.

YES ☒ NO ☐ Maintain the number of repeated trouble reports on residence and single-line business lines at or below 22% of the total customer trouble reports on those lines.

YES ☒ NO ☐ Maintain transmission facilities meeting the requirements of Substantive Rule 26.54, Transmission Requirements.

YES ☒ NO ☐ Meet the Commission's continuity-of-service requirements established in Substantive Rule 26.51.

YES ☐ NO ☒ Provide 911 emergency telephone service in accordance with Chapters 771 and 772 of the Texas Health and Safety Code, as applicable.

YES ☐ NO ☒ Commit to providing equipment that will comply with 911 requirements.

YES ☒ NO ☐ Commit to providing at least 1 customer service representative per every 2,500 customers during normal business hours.

YES ☐ NO ☒ Commit to providing equipment that is local number portability (LNP) capable.

YES ☒ NO ☐ Maintain an emergency operations plan that addresses disaster recovery procedures.

YES ☐ NO ☒ Comply with PUC Substantive Rules §26.32 and §26.130 requiring notification of customers about slamming and cramming information on monthly bills.

YES ☒ NO ☐ Comply with PUC Substantive Rules §26.31 for customer disclosure.

YES ☒ NO ☐ Comply with PUC Substantive Rules §26.122 regarding customer proprietary network information.

YES ☐ NO ☒ Comply with applicable portions of Chapter 26, Subchapter B regarding customer service and protection.

YES ☒ NO ☐ Comply with anti-discrimination laws on the basis of race, nationality, color, religion, sex, marital status, income level, source of income, or geographic location.

YES ☐ X ☒ NO ☐ Disclose to customer that they may contact the PUC and pursue complaints if the customer and certificate holder cannot resolve the complaint.

Supplemental information regarding “NO” answers for Service Quality Questionnaire.

Applicant seeks to build and own telecommunications infrastructure and act as a middle mile service provider exclusively. Applicant will not provide end user service, only dark and lit fiber circuits between other telecommunications service providers or large enterprise customers. Because of this, many of these questions are not clearly applicable. Applicant does commit to following all requirements that are applicable to its business model, and any additional that may be required by the public utility commission.

Craig E. Brunkenhoefer

11044 SW Davos Lane, Wilsonville, OR 97070 • cebrunk@mac.com • (503) 505-0272

Accomplished project manager and licensed attorney looking to apply my experience to lead, train and assist others in all phases of the telecommunication development process. I enjoy working collaboratively with a team and have established an excellent rapport with outside stakeholders, vendors, and internal team members.

BAR ADIMISSIONS

- ❖ State of Oregon, 2020
- ❖ State of Texas, 2010
- ❖ U.S. District Court Southern District of Texas, 2011

QUALIFICATIONS

- ❖ Experience in land/building acquisitions, leasing, zoning, and identifying locations for telecommunication installations.
- ❖ Responsible for the completion of zoning and permit applications for submittal to the jurisdictions and coordination of the zoning process with outside counsel and outside vendors.
- ❖ Vast experience negotiating commercial leases, easements, and amendments for telecommunications sites.
- ❖ Experience with due diligence, including researching zoning issues, commercial land uses, environmental impact studies, regulatory compliance, easements, and encumbrances.
- ❖ Versed in the Telecommunications Act of 1996 and subsequent case law interpreting the act, as well as recent FCC rulings.
- ❖ Proficient in the real estate processes and managing external databases for Verizon, T-Mobile, AT&T, and Dish Wireless.
- ❖ Vast experience in new business development and client relations.
- ❖ Significant experience training and supervising personnel and project teams.

EMPLOYMENT

- ❖ **Program Manager** (July 2021 – Present)
SMARTLINK GROUP
[Remote Position]
1997 Annapolis Exchange Parkway, Suite 200
Annapolis, MD 21401
Supervisor: Chris Forsberg, may be contacted
 - Manage an internal team of coordinators, real estate project managers, and construction managers assigning workloads and developing schedules ensuring the timely completion of escalated capital projects for T-Mobile across Oregon and Southern Washington.
 - Manage the design, construction, and integration of over one hundred and

sixty-five AAV projects and update outside stakeholders on the progress of the integration of backhaul and upgrades to sites.

❖ **Senior Site Acquisition Specialist** (November 2020 – present)

DISH WIRELESS

7370 S. W Durham Rd. Bldg. G

Tigard, OR 97224

Supervisor: Brian Flores, may be contacted

- Manage outside vendors to deliver site acquisition services for new capitol projects. Assisting internal stakeholders in the design and deployment of the first Greenfield 5G O-RAN Wireless Network.

❖ **Site Acquisition Manager** (January 2019 – November 2020)

VELOCITEL, LLC

6400 Mohawk Dr.

Tualatin, OR 97062

Supervisor: John Waters, (805) 340-5483, may be contacted

- Effectively managed numerous projects throughout Oregon, Washington, and Idaho, including the tracking of site candidate packages, lease agreements, zoning and permit applications, regulatory compliance, as well as providing regular project updates to outside stakeholders.

❖ **Site Acquisition Specialist** (April 2018 – December 2018)

VELOCITEL, LLC

4004 Kruse Way Place, Suite 220

Lake Oswego, OR 97035

Supervisors: Chris Forsberg (503) 860-2587, may be contacted

- Handled the entire site acquisition process for new site builds from search ring to construction start for numerous sites throughout Washington and Oregon.

❖ **Attorney** (January 2010 – April 2018)

BRUNKENHOEFER, P.C.

500 N. Shoreline Blvd, Suite 1100

Corpus Christi, Texas 78401-0354

Supervisor: R. Blake Brunkenhoefer, (361) 888-8808, may be contacted.

(Formerly known as Brunkenhoefer & Turman, P.L.L.C.; merged with Brunkenhoefer Law Firm, P.C. in 04/14)

- Extensive experience drafting legal documents.
- Substantial experience in all phases of civil litigation, both federal and state, including client/witness interviews, legal research, pleadings, discovery, attending inspections, retaining experts, motion practice, depositions, mediations, arbitrations, trial preparation and trial.

EDUCATION

❖ **St. Mary's University School of Law**, San Antonio, Texas

Doctor of Jurisprudence, May 2009

- ❖ **Texas State University**, San Marcos, Texas
Bachelor of Arts in Communication, Minor in English, 2007

PROFESSIONAL ORGANIZATIONS

- ❖ Oregon State Bar
- ❖ State Bar of Texas
- ❖ American Bar Association
- ❖ American Society of Law, Medicine & Ethics

Lach Litwer, MBA

2204 Sherman Ave.
Hood River, OR 97031
Home Phone 503-887-4372
Email – Lach@draupnir.us

PROFILE

Infrastructure and real estate investor, asset manager, serial entrepreneur, and MBA. Prior to co-founding Draupnir Infrastructure Group he directed energy infrastructure investment for Allotrope Partners, a Bay Area Venture Fund. His work focused on energy access and resilience projects partnering energy cooperatives, international microgrid and energy storage developers, and multinational development banks. He also founded Columbia Gorge Capital, a real estate investment firm that develops, owns, and operates commercial and workforce housing properties in Oregon.

Before entering the private sector Mr. Litwer served as a Presidential Appointee in the United States Department of Defense from 2009 to 2013 as Senior Advisor to the Assistant Secretary of the Air Force (IE). In this role he led policy initiatives expanding public-private partnership financing for infrastructure projects.

Prior to his service at the Pentagon, Mr. Litwer deployed to Afghanistan with the United States Army as an embedded trainer for the Afghan National Army. For his service he received the Bronze Star Medal. He currently serves as a Civil Affairs Officer in the United States Army Reserves.

PROFESSIONAL EXPERIENCE

6/21 - Present Draupnir Infrastructure Group

Managing Member

Responsible for business and finance, strategic partnerships and jurisdictional cooperation. Oversees all activities relating to investor management, partnerships, asset acquisitions and dispositions.

1/20 - Present Columbia Gorge Capital

Managing Member

Manages day to day operation of development and acquisition activities for four investment vehicles. Projects under management include construction of three cottage communities totaling 23 residences under development in Nye Beach, OR; acquisition of a 12-unit workforce housing apartment building in Hood River, OR; development of a new prospective 23 unit workforce housing apartment building in Hood River, OR; and development of 75 room boutique hotel in Hood River, OR. Total invested funds to date exceeds \$10.5MM.

6/16 - Present Wōden, LLC

Co-Founder

Oversees engineering and audit support to infrastructure assets design, deployment, and auditing for telecommunications and energy utilities in the Oregon and Washington markets.

10/15 - 12/17 Allotrope Partners

Director of Energy Business

Oversaw investment and project development for micro-grid projects. Sourced, negotiated, and conducted pre-development, securing land rights, right of way, and interconnection for Philippine electric utility investments in \$12 million, 20MWh battery diesel power generation replacement project

4/09 – 7/13 United States Department of Defense

Senior Advisor to the Assistant Secretary of the Air Force

Oversaw process and special projects for the Assistant Secretary for Installations, Energy, and Environment.

- Oversaw policy relating to private management of base housing and utilities, resulting \$36.8 million in new infrastructure investment and development of 16 million acres of underutilized military land;
- Facilitated increased use of Energy Savings Performance Contracts for energy and water conservation resulting in contracts valued at \$180 million during FY13/14

Joint Matters Team Chief, NGB Office of Legislative Liaison

Principal project manager for legislative matters pertaining to both Army and Air National Guard programs. Formulated, coordinated, supervised, and executed the National Guard's Congressional policy and strategy.

- Led Congressional inquiry responses regarding National Guard programs of record resulting in over \$30 million in new funding for national security programs executed by the National Guard;
- Conducted educational outreach to Congressional offices and committee staff regarding the programs, capabilities, and outcomes for which National Guard units are responsible;
- Published analysis briefings on the defense budget process including Senate and House appropriations subcommittee reports for senior National Guard leaders engaged in congressional outreach

1/00 – Present United States Army Reserves

Civil Affairs Officer

Chief of Civil Knowledge management advising combatant commanders, unified action partners, non-governmental agencies, other agencies, and host nation partners on matters relating to civilian leadership, governance, infrastructure, humanitarian considerations, economy, and public health supporting the combatant commander in assigned area of responsibility.

EDUCATION

July 2021	CCB Licensed Construction Contractors Board of Oregon CCB License Number: 236604
August 2020	Command and General Staff Officer College Graduate
2013-2015	Masters of Business Administration UC Berkeley, Haas School of Business
2011-2014	Bachelors of Science in Psychology University of Oregon

MIKE CRAIG

38491 S. NOWLENS BRIDGE RD., MOLALLA, OR 97038 • (503) 201-8218
MIKE@NWDRILLINGANDBORING.COM

EXPERIENCE

OWNER & DIRECTIONAL DRILLER

Molalla, OR

NW Drilling & Boring
05/2014 – present

- Read and understand maps, drawings, and diagrams for project build process
- Create estimates based on job walks or drawings
- Attend pre-construction meetings to assist customers in design process
- Work closely with appropriate jurisdictions to ensure all permitting is acquired before project begins. Make certain all permits, and plans are on site before work starts
- Call in utility locates. Setup and cleanup of work site including traffic and pedestrian control
- Confirm bore path with install foreman and drill operator
- Inspects the work that is in progress to ensure that the workmanship conforms to specifications
- Provide direct instruction and supervision of field staff
- Perform job site analysis (JSA) including completion of paperwork
- Evaluate work upon completion to ensure objectives have been met
- Read utility locates and coordinate day lighting of these facilities
- Operate Horizontal Directional Drill for installation of underground telecommunications cable conduit, including fiber optic cable
- Ensures safety of the public and other utilities underground facilities
- Performs all duties according to prescribed safety procedures and uses appropriate safety equipment
- Operates construction equipment to facilitate alignment, movement, and adjustment of machinery to conform to grade specifications
- Level earth to final grade inspections
- Operates vehicles and equipment operations from trucks to other equipment as directed and certified
- Performs proper maintenance by greasing, oiling, and making minor repairs on equipment.
- Ensure there are proper clearances to install the product per standards
- Record the depth of the tool head as required
- Ensure the drill head is in a good position at the exit pit to connect the product
- Coordinate with office staff to ensure proper documentation is provided to the client; including as-builts and bore logs

DIRECTIONAL DRILLER

SILVERTON, OR

Bullseye

08/2004 – 05/2014

- Read and understand maps, drawings, and diagrams for project build process
- Call in utility locates. Setup and cleanup of work site including traffic and pedestrian control
- Confirm bore path owner and customer
- Inspect the work that is in progress to ensure that the workmanship conforms to specifications
- Perform job site analysis (JSA) including completion of field paperwork for office
- Evaluate work upon completion to ensure objectives have been met
- Read utility locates and coordinate day lighting of these facilities
- Operate Horizontal Directional Drill for installation of underground telecommunications cable conduit, including fiber optic cable
- Ensures safety of the public and other utilities underground facilities
- Performs all duties according to prescribed safety procedures and uses appropriate safety equipment
- Operates construction equipment to facilitate alignment, movement, and adjustment of machinery to conform to grade specifications
- Level earth to final grade inspections
- Operates vehicles and equipment operations from trucks to other equipment as directed and certified
- Performs proper maintenance by greasing, oiling, and making minor repairs on equipment.
- Ensure there are proper clearances to install the product per standards
- Record the depth of the tool head as required
- Ensure the drill head is in a good position at the exit pit to connect the product
- Coordinate with office staff to ensure proper documentation is provided to the client; including as-builts and bore logs

Draupnir Infrastructure Group, LLC Balance Sheet

Address: 3982 Neal Creek Rd, Hood River, OR, 97031

(Unaudited)

Date Created:

2 April, 2022

Date Issued:

6 April, 2022

Pro Forma Balance Sheet

Assets	Q1, 2022		
Current Assets			
Cash	\$13,686.15		
Accounts Receivable	\$0.00		
Other Current Assets	\$3,400.00		
Total Current Assets	\$17,086.15		
Fixed Assets			
Property, Plant, and Equipment			
Quincy Outside Plant	\$170,000.00		
Intangible Assets			
Multistate Regulatory & Engineering Packages	\$260,000.00		
Accumulated Depreciation	\$0.00		
Total Fixed Assets	\$430,000.00		
Total Assets	\$447,086.15		
Liabilities and Equity	Q1, 2022		
Current Liabilities			
Accounts Payable	\$2,000.00		
Credit Cards	\$0.00		
Customer Credit	\$0.00		
Taxes Payable	\$0.00		
Unearned Revenue	\$0.00		
Other Current Liabilities	\$0.00		
Total Current Liabilities	\$2,000.00		
Long Term Liabilities			
Long Term Liabilities	\$0.00		
Total Long Term Liabilities	\$0.00		
Total Liabilities	\$2,000.00		
Equity			
Net Profit (Loss)	\$375,086.15		
Retained Earnings - Opening Balance	\$0.00		
Owner's Deposits (Withdrawals)	\$70,000.00		
Total Equity	\$445,086.15		
Total Liabilities and Equity	\$447,086.15		