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March 11, 2015

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

OVERNIGHT DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Abbreviated Securities Certificate of ACN Communication Services, Inc. (A-310906)

Dear Ms. Chiavetta:

ACN Communication Services, Inc. (“ACN”), through undersigned counsel and pursuant to Section 1901 of the Pennsylvania Statutes, Pa. Stat. Ann. tit. 66, § 1901 and Section 3.602 of the Pennsylvania Code, 52 Pa. Code § 3.602, hereby submits this Abbreviated Securities Certificate (“**Certificate**”). ACN requests that the Pennsylvania Public Utility Commission (“**Commission**”) issue a Notice of Registration of a Securities Certificate (“**Notice**”) to the extent necessary to allow ACN to participate in a financing arrangement in connection with the issuance of senior secured debt in the aggregate amount of up to \$135 million (the “**Financing**”) by ACN’s immediate parent company, LKN Communications, Inc. (“**Parent**”)

ACN respectfully submits that it qualifies for abbreviated treatment under Section 3.602(a)(3)(ii) of the Pennsylvania Code, 52 Pa. Code § 3.602(a)(3)(ii). Specifically, ACN’s total gross operating revenue received from the provision of intrastate telecommunications services rendered in Pennsylvania constituted less than ten percent (10%) of ACN’s total gross operating revenue for fiscal year 2014. ACN respectfully requests that the Commission promptly register this Certificate and issue a Notice of Registration pursuant to the abbreviated procedure.

In support of this request, ACN submits the following information:

ACN Communication Services, Inc.

ACN is a corporation incorporated under the laws of the State of Michigan on April 30, 1999, and headquartered at 1000 Progress Place, Concord, NC 28025. ACN has been authorized

in the State of Pennsylvania to offer local exchange and interexchange services to residential and business customers (the “**Regulated Service**”).

ACN is a wholly-owned subsidiary of Parent, a corporation incorporated under the laws of the State of Michigan on November 24, 1992. Parent, through the Company and the Parent’s other subsidiaries, markets a variety of telecommunications and other essential home and business products in all 50 U.S. states and in 23 other countries around the world, generating consolidated annual revenues in excess of \$500 million.

Further information concerning ACN’s legal, technical, managerial and financial qualifications to provide service was submitted with its application for certification with the Commission and is, therefore, a matter of public record. ACN respectfully requests that the Commission take official notice of that information and incorporate it herein by reference.

II. Contacts

Inquiries or copies of any correspondence, orders, or other materials pertaining to this filing should be directed to:

Philip J. Macres
Klein Law Group, PLLC
1250 Connecticut Avenue N.W.
Suite 200
Washington, DC 20036
PMacres@KleinLawPLLC.com
Tel: (202) 289-6956

with copies to:

Brian McDermott
Strategies Law Group, PLLC
1002 Parker Street
Falls Church, VA 22046
BMcdermott@stratlg.com
Tel: (571) 730-4970

III. Abbreviated Securities Certificate

ACN submits the following information regarding the financing arrangements:

- A) **Issuance:** ACN will pledge its assets as security and/or enter into guaranty arrangements in connection a debt financing arrangements as follows:

Under the Financing, Parent intends to enter into a senior secured credit facility in

a maximum principal amount of up to \$135 million. Loans under that credit facility will be provided by a syndicate of financial institutions (the “Lenders”). Each of the Parent’s domestic subsidiaries, including ACN, will guaranty Parent’s obligations under the credit facility and grant a security interest to the Lenders in substantially all of the subsidiary’s assets. The Company’s Regulated Service assets are a small fraction of the total assets supporting the Credit Facility. The Company’s annual revenues derived from the Regulated Service represent less than 1% of the Parent’s annual consolidated revenues.

ACN emphasizes that the proposed financial arrangements will not have any negative impact on the services offered by ACN. Rather, ACN will continue to offer telecommunications services in Pennsylvania with no change in the rates or terms and conditions of service. As a result, these financing arrangements will be transparent to ACN’s customers in Pennsylvania.

- B) Use of the proceeds:** Proceeds from the Financing will be used, among other things, to support strategic growth and for ongoing working capital.
- C) Public Interest Statement:** Applicants submit that ACN’s participation in measures in support of the Financing as described above will serve the public interest in promoting competition among telecommunications carriers. First, the proposed Financing is expected to provide the ACN companies with greater financial resources which will allow ACN to compete more effectively for customers in Pennsylvania, as well as to ensure that ACN can continue to provide high-quality telecommunications services to existing customers.

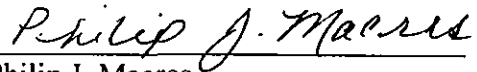
Second, the Financing will be conducted in Pennsylvania in a manner that will be transparent to customers, and will not result in any negative changes to ACN services received by customers. ACN expects to continue to provide high-quality telecommunications services without any interruption, reduction, loss or impairment of services and without any changes to the rates, terms or conditions of service to customers.

In light of the foregoing, ACN respectfully requests that the Commission promptly register this Abbreviated Securities Certificate and issue a Notice of Registration, pursuant to Section 1901 of the Pennsylvania Statutes, Pa. Stat. Ann. tit. 66, § 1901 and Section 3.602(c) of the Pennsylvania Code, 52 Pa. Code § 3.602(c), permitting ACN to participate in the financial arrangement described above.

Rosemary Chiavetta, Secretary
March 11, 2015
Page 4

An original and one (1) copy of this letter are enclosed. Please date-stamp the enclosed extra copy and return it in the attached postage-paid envelope. As required by the Commission's rules, a filing fee in the amount of \$25 is attached.

Respectfully submitted,



Philip J. Macres
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Counsel to
ACN Communication Services, Inc.

§ 1.36 Verification

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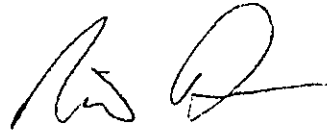
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Verification

I, Rick Dunn, Treasurer of LKN Communications, Inc., parent company of ACN Communication Services, Inc., hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief), and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

3-10-2015



Date

Signature

From: (202) 289-8955
Mr. Philip Macres
Klein Law Group
1250 Connecticut Ave
#200
Washington, DC 20036

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Rosemary Chlavetta, Secretary
Pennsylvania Public Utility Commiss
Commonwealth Keystone Bldg.
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HARRISBURG, PA 17120

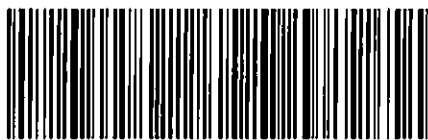
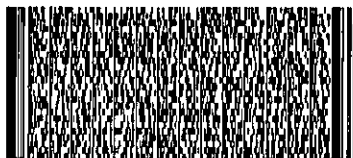
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