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June 7, 2021

**VIA ELECTRONIC FILING**

Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street  
Atlanta, GA 30334-9052

Re: *Docket No. \_\_\_\_\_; Joint Application of MTN Infrastructure TopCo LP, Transferor, and Cox Communications, Inc., Transferee, For Authority to Transfer Indirect Control of FRC, LLC, LMK Communications, LLC, PalmettoNet, Inc., South Carolina Net, Inc. d/b/a Spirit Telecom, South Carolina Telecommunications Group Holdings, LLC, and Spirit Tower Company, LLC*

Dear Mr. McAlister:

On behalf of the parties to the above-captioned matter, please find their Joint Application enclosed. Thank you for your assistance in this matter.

Respectfully submitted,

/s/ Brian W. Murray

Brian W. Murray  
WILKINSON BARKER KNAUER, LLP  
*Counsel for Transferee*

Enclosures

**BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION**

Joint Application of	)	
	)	
MTN Infrastructure TopCo LP	)	
<i>Transferor</i>	)	
	)	
and	)	
	)	Docket No. _____
Cox Communications, Inc.	)	
<i>Transferee</i>	)	
	)	
For Authority to Transfer Indirect Control of	)	
	)	
FRC, LLC	)	
LMK Communications, LLC	)	
PalmettoNet Inc.	)	
South Carolina Net, Inc. d/b/a Spirit Telecom	)	
South Carolina Telecommunications Group	)	
Holdings, LLC	)	
Spirit Tower Company LLC	)	
<i>Licensees</i>	)	

**JOINT APPLICATION**

Pursuant to O.C.G.A. Section 46-5-41 of the Georgia Code and the Rules of the Georgia Public Service Commission (“Commission”), MTN Infrastructure TopCo LP (“MTN Infrastructure” or “Transferor”) and Cox Communications, Inc. (“Cox,” and together with MTN Infrastructure, the “Applicants”) hereby respectfully request the approval of the Commission to consummate a transaction that will result in a change of control of certain indirect, wholly-owned subsidiaries of MTN Infrastructure (the “Segra Commercial Licensees”), which include FRC, LLC (“FRC”), LMK Communications, LLC (“LMK”), PalmettoNet Inc. (PalmettoNet”), South Carolina Net, Inc. d/b/a Spirit Telecom (“SCNet”), South Carolina Telecommunications Group Holdings, LLC (“SCTG Holdings”), and Spirit Tower Company LLC (“Spirit Tower”) (collectively, the “Licensees”) that each hold Commission-issued authorizations, from MTN Infrastructure to Cox.

As discussed in more detail below, MTN Infrastructure is separating the residential and commercial service segments of its business that currently operate under the brand name “Segra.” Cox proposes to acquire control only of the Segra Commercial Licensees, including the Licensees identified above.<sup>1</sup> The Licensees provide commercial services in Georgia, and do not provide any residential services in Georgia.<sup>2</sup> There will be no substantive change in the ownership or control of the Segra entities that will continue to provide residential service in other states.

In support of this Joint Application, the Applicants respectfully submit the following information:

## **I. DESCRIPTION OF THE APPLICANTS**

### **A. Transferor – MTN Infrastructure TopCo LP**

MTN Infrastructure is a Delaware limited partnership headquartered at One Lumos Plaza, Waynesboro, Virginia 22980. The company was created to aggregate the ownership of various investment funds ultimately managed by an affiliate of EQT AB (“EQT”) in connection with the investment of the EQT Infrastructure III Fund (including co-investors) in Segra through its acquisitions of Lumos Networks Corp. in 2017,<sup>3</sup> Spirit Communications in 2018,<sup>4</sup> and North State Telecommunications Corporation in 2020.<sup>5</sup>

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<sup>1</sup> Other than the Licensees, none of the Segra Commercial Licensees hold certificates issued by the Commission.

<sup>2</sup> Segra’s residential business is limited to North Carolina and Virginia.

<sup>3</sup> See *In the Matter of Joint Application to Transfer Indirect Control of MTN Infrastructure TopCo, Inc., LMK Communications, LLC, and Lumos Networks Corp.*, Docket No. 30049, Document No. 167895, Letter Order (Apr. 12, 2017).

<sup>4</sup> See *In the Matter of Joint Application to Transfer Indirect Control of South Carolina Net, Inc. d/b/a Spirit Telecom, FRC, LLC, Spirit Tower Company, LLC, South Carolina Telecommunications Group Holdings LLC d/b/a Spirit Communications, and PalmettoNet Inc., to Clemson BidCo, LLC*, Docket Nos. 25702, 22982, 40819, 30049, and 9919, Document Nos. 170505, 170506, 170507, 170508, 107509, and 170510, Letter Order (Dec. 6, 2017).

<sup>5</sup> See generally *Domestic Section 214 Application Granted for Transfer of Control of North State Telecommunications Corporation to MTN Infrastructure Topco, Inc.*, Public Notice, 35 FCC Rcd 3528 (2020).

EQT, founded in Sweden in 1994, is a leading alternative investments firm with approximately EUR 67 billion in assets under management across 26 active funds. EQT and its affiliates acting as the manager or advisers to such funds are committed to the growth and development of the portfolio companies under the funds' ownership, and seek to develop and grow the core strengths of such portfolio companies. EQT funds have portfolio companies in the United States, Europe, and Asia, with total annual sales of approximately EUR 29 billion and approximately 175,000 employees.<sup>6</sup>

**B. Transferee – Cox Communications, Inc.**

Cox is a division of Cox Enterprises, Inc., a family-owned business founded over 120 years ago. It is a Delaware corporation headquartered at 6205-A Peachtree Dunwoody Road, Atlanta, Georgia 30328. Cox and its affiliates provide domestic and international telecommunications services, broadband service, and video service to more than six million customers in the residential, small and medium business, and enterprise markets. Cox operates cable systems in eighteen states: Arizona, Arkansas, California, Connecticut, Florida, Georgia, Idaho, Iowa, Kansas, Louisiana, Massachusetts, Nebraska, Nevada, North Carolina, Ohio, Oklahoma, Rhode Island, and Virginia.<sup>7</sup> Cox is a nondominant carrier in both the domestic and international service markets across its footprint, and is not affiliated with any dominant carrier. Cox's subsidiary, Cox Georgia Telcom, LLC, is authorized by the Commission to provide facilities-based, competitive local exchange carrier ("CLEC") service in Georgia pursuant to Certificate No. L-087 (Docket No. 9039).

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<sup>6</sup> For more information about EQT, visit <http://www.eqtgroup.com>.

<sup>7</sup> Cox provides video service, but not telecommunications service, in Massachusetts and North Carolina. In addition, Cox provides certain transport services on a very limited basis in Colorado, Maryland, and Missouri.

Over the last 10 years, Cox has invested more than \$15 billion in its communities through infrastructure upgrades to deliver video, phone, and high-speed internet service to homes and businesses in the company's service area.<sup>8</sup> Cox has made significant investments in the construction of fiber facilities, with more than 38,000 route miles of fiber in place today. Cox's network infrastructure investments have included EasyTel, EdgeConneX, InSite Wireless, StackPath, Unite Private Networks ("UPN"), and ViaWest. Cox plans to invest another \$10 billion in the next five years.<sup>9</sup>

Cox's commercial division, Cox Business, provides voice, data, and video services for more than 355,000 small and regional businesses nationwide, including health care providers; K-12 and higher education; financial institutions; and federal, state, and local government organizations. Cox Business also serves most of the top-tier wireless and wireline telecommunications carriers in the U.S. through its wholesale division.<sup>10</sup>

### **C. Licensees**

The Licensees, along with the other Segra Commercial Licensees that operate in other states, operate under the brand name "Segra." Segra owns and operates an advanced fiber infrastructure network of more than 26,000 miles that connects more than 9,000 on-net locations and six data centers throughout nine Mid-Atlantic and Southeastern states. Segra provides Ethernet, MPLS, dark fiber, advanced data center services, IP and managed services, voice and cloud solutions. Customers include carriers, enterprises, governments, and healthcare organizations.<sup>11</sup>

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<sup>8</sup> Cox Communications Fact Sheet, <https://newsroom.cox.com/company-overview>.

<sup>9</sup> Cox Communications Fact Sheet, <https://newsroom.cox.com/company-overview>.

<sup>10</sup> Cox Business, <https://www.cox.com/business/home.html>.

<sup>11</sup> In addition to commercial services, Segra delivers high-speed, fiber-based integrated telecommunications services to residential and small business customers in rural Virginia and North Carolina. The residential segment of Segra, operating under the Lumos Networks and North State brands, operates in Virginia (Lumos) and North Carolina (North State), where it provides broadband, voice, and video, mostly via its fiber network, to nearly 200,000

**1. FRC**

FRC, a South Carolina limited liability company, is authorized to provide CLEC and IXC service in Georgia pursuant to Certificate No. X-1079 (Docket No. 22982-U).

**2. LMK**

LMK, a North Carolina limited liability company, is authorized to provide CLEC service in Georgia pursuant to Certificate No. L-0473 (Docket No. 30049) and interexchange carrier (“IXC”) service in Georgia pursuant to Certificate No. R-1073 (Docket No. 20772).

**3. PalmettoNet**

PalmettoNet, a South Carolina corporation, is authorized to provide CLEC service in Georgia pursuant to Certificate No. X-984 (Docket No. 9919-U).

**4. SCNet**

SCNet, a South Carolina corporation, is authorized to provide CLEC services in Georgia pursuant to Certificate Nos. L-0431 (Docket No. 25702-U), A-0162 (Docket No. 9892-U), and R-0600 (Docket No. 9892-U).

**5. SCTG Holdings**

SCTG Holdings, a South Carolina limited liability company, is authorized to provide CLEC service in Georgia pursuant to Certificate No. L-0570 (Docket No. 40819).

**6. Spirit Tower**

Spirit Tower is authorized to provide CLEC service in Georgia pursuant to Certificate Nos. L-0343 (Docket No. 15767-U).

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residential and small-to-medium-sized business (“SMB”) locations. For more information about Segra’s technology and commitment to customer care, visit <http://www.segra.com>.

## II. DESCRIPTION OF THE TRANSACTION

Pursuant to an Agreement and Plan of Merger dated April 26, 2021 (“Merger Agreement”), and as set forth in more detail below, Cox will indirectly acquire ownership and control of the Segra Commercial Licensees, which include the Licensees, from MTN Infrastructure through its purchase of 100% of the outstanding stock of MTN Infrastructure TopCo Blocker, Inc. (“MTN Parent”), a direct, wholly-owned subsidiary of MTN Infrastructure and the indirect parent of the Segra Commercial Licensees. Upon consummation of the transactions described herein, MTN Parent will become a direct, wholly-owned subsidiary of Cox, and Cox will indirectly own and control the Segra Commercial Licensees. Segra’s residential business segments will continue to be ultimately owned and controlled by various investment funds ultimately managed by an affiliate of EQT.<sup>12</sup>

The Merger Agreement contemplates that, through a series of steps, MTN Infrastructure will separate Segra’s commercial business segments from its residential business segments (the “Pre-Merger Separation”), after which, Cox will acquire the Segra Commercial Licensees pursuant to the merger transaction described below (the “Merger”). Details regarding the Merger and the Pre-Merger Separation are as follows:

The Merger. In connection with the Merger Agreement, Cox has formed a new wholly-owned subsidiary, Gridiron Merger Sub, Inc., a Delaware corporation (“Merger Sub”). At the effective time of the Merger, Merger Sub will merge with and into MTN Parent. Merger Sub will cease to exist, and MTN Parent will be the surviving corporation. Accordingly, upon consummation of the Merger, Cox will hold directly 100% of the issued and outstanding stock

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<sup>12</sup> This Joint Application seeks Commission consent only to the transfer of control of the Licensees. The information presented here regarding Segra’s residential segment is intended solely to provide context for the substantive transfer of control of the Segra Commercial Licensees.

of MTN Parent. The Licensees and the other Segra Commercial Licensees will, in turn, be indirect, wholly-owned subsidiaries of Cox. The Merger is subject to consummation of the Pre-Merger Separation, and other customary closing conditions, including the receipt of this Commission's approval.

The Pre-Merger Separation. Shortly before the closing of the Merger, Transferor will engage in a series of *pro forma* transactions in order to facilitate the separation of Segra into distinct commercial and residential groups. Control of the Segra Commercial Licensees will then be transferred to Cox through the Merger between MTN Parent and Merger Sub, as described above. Segra's residential group will continue serving residential and small business customers in Virginia and North Carolina without interruption.<sup>13</sup>

The Pre-Merger Separation will take a number of steps which will involve *pro forma* transfers of control of the Segra entities that provide residential service to a newly formed subsidiary of MTN Infrastructure – Gridiron Fiber Holdings.

Please see the attached Exhibit A depicting the current structure of the entire Segra business, including both the commercial and residential groups, and also identifying the post-closing ownership of the Licensees after consummation of the Merger with Cox.

### **III. PUBLIC INTEREST CONSIDERATIONS**

The Commission should grant the Joint Application expeditiously, because the Merger will generate substantial public interest benefits with no countervailing harms.<sup>14</sup>

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<sup>13</sup> For more information about the Segra residential business, please visit <https://www.lumosnetworks.com>.

<sup>14</sup> The Applicants have also filed a transfer-of-control application with the Federal Communications Commission ("FCC"), which is available at [https://www.fcc.gov/ecfs/search/filings?proceedings\\_name=21-224&sort=date\\_disseminated,DESC](https://www.fcc.gov/ecfs/search/filings?proceedings_name=21-224&sort=date_disseminated,DESC). The FCC has accepted the application for filing and will consider it on a streamlined basis. See Public Notice, *Domestic Section 214 Application Filed for the Transfer of Control of Certain Subsidiaries of MTN Infrastructure TopCo LP to Cox Communications, Inc.: Streamlined Pleading Cycle Established*, DA 21-658, WC Docket No. 21-224 (rel. June 4, 2021), available at <https://ecfsapi.fcc.gov/file/06040296909407/DA-21-658A1.pdf>.



*Presence of Public Interest Benefits.* The combined company's increased network assets, expanded geographical presence, greater network capacity, and broader array of services will be an immediate benefit for current customers of Cox and the Segra Commercial Licensees, which include the Licensees.

The Merger will strengthen the Licensees by affiliating them with Cox. Cox is a well-established company with stable management and significant capital resources. It has a record of investment in the deployment of advanced telecommunications facilities and a commitment to continuing to invest for the long-term. Cox's history as a pioneer in advanced and innovative services is undeniable. It was the first company to provide voice, video, and high-speed data services simultaneously over a cable platform. And as noted above, Cox has invested billions (with more to come) in its communities and infrastructure – including through the acquisition and successful integration of several other providers dedicated to serving commercial customers, such as EasyTel and UPN.

The Merger demonstrates Cox's continued commitment to the enterprise services market. Through this transaction, the Licensees will gain access to Cox's expert resources, capabilities, and strategic insights, which will enable them to scale up operations and position themselves as aggressive and expanding providers of differentiated fiber infrastructure solutions. The Licensees' affiliation with Cox will assist them in pursuing long-term strategic growth opportunities in new markets, as well as expanding and densifying its fiber network throughout its existing geographic footprint and adjacent areas. Similarly, the Merger will provide the Licensees with the ability to leverage Cox's strategic capabilities in serving their customers, including advanced data products and related managed services. Thus, while the Licensees will continue to operate independently under their current brand, the Merger will enable the

companies to become stronger and more strategic as a result of their integration into the Cox family of businesses.

Segra customers will benefit from this transaction as a result of the expanded footprint Segra can serve with access to Cox's network in adjacent territory where Segra does not have its own fiber network; Cox's customers will similarly benefit from Cox having access to the expanded reach of Segra's network into areas not served by Cox's own facilities. The Segra Commercial Licensees operate differentiated metro fiber assets across a broad service footprint in nine states in the Mid-Atlantic and Southeast that complements Cox's existing fiber footprint. Their combination will allow Cox and the Segra Commercial Licensees to reach customers they cannot serve today, with on-net facilities across a broader geographic area.

Thus, the Merger will significantly strengthen Cox's and the Licensees' ability to compete with the ubiquitous services offered by numerous well-capitalized, facilities-based competitors (including ILECs, CLECs, and other cable operators, as well as infrastructure-focused providers) in Georgia. In particular, the combined company will be better able to compete for and serve multi-location and other business customers across the combined company's expanded footprint. The Merger also will provide the opportunity for significant savings and improvements in service quality through the reduction in reliance on third parties. These outcomes are routinely cited by regulators as important public interest benefits justifying consent to transfers of control such as this transaction.<sup>15</sup>

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<sup>15</sup> See, e.g., *Applications of Level 3 Communications, Inc. and CenturyLink, Inc. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 32 FCC Rcd 9581 ¶¶ 52, 57 (2017); *Applications of XO Holdings and Verizon Communications Inc. For Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 31 FCC Rcd 12504 ¶¶ 60-63 (2016); *Applications Filed for the Transfer of Control of tw telecom inc. to Level 3 Communications, Inc.*, Memorandum Opinion and Order, 29 FCC Rcd 12842 ¶ 14 (2014); *Applications Filed for the Transfer of Control of Insight Communications Company, Inc. to Time Warner Cable Inc.*, Memorandum Opinion and Order, 27 FCC Rcd 497 ¶¶ 18-19 (2012).

*Absence of Public Interest Harms.* There is little risk of competitive harm from the Merger. Cox and the Licensees are nondominant carriers that operate largely complementary networks and compete with a significant number of nondominant carriers in their markets as well as incumbent LECs, which remain the dominant providers of business services in all of their markets. Further, the Merger will be seamless to the Licensees' current customers, who will continue to be served by those companies. And as noted above, the Merger will have no impact on any residential services or customers.

#### **IV. CONTACT INFORMATION**

All correspondence and communications with respect to this Joint Application should be addressed or directed as follows:

For the Transferor:

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andrew.lipman@morganlewis.com  
ulises.pin@morganlewis.com  
joshua.bobek@morganlewis.com

With a copy to:

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Senior Vice President and General Counsel  
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Tel.: (540) 946-8677  
mary.mcdermott@segra.com

For the Transferee:

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With a copy to:

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joiava.philpott@cox.com

## V. CONCLUSION

For the foregoing reasons, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by the expeditious grant of this Joint Application for the transfer of indirect ownership and control of the Licensees to Cox.

Respectfully submitted,

/s/ Joshua M. Bobeck

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*Counsel for MTN Infrastructure TopCo LP*

/s/ Brian W. Murray

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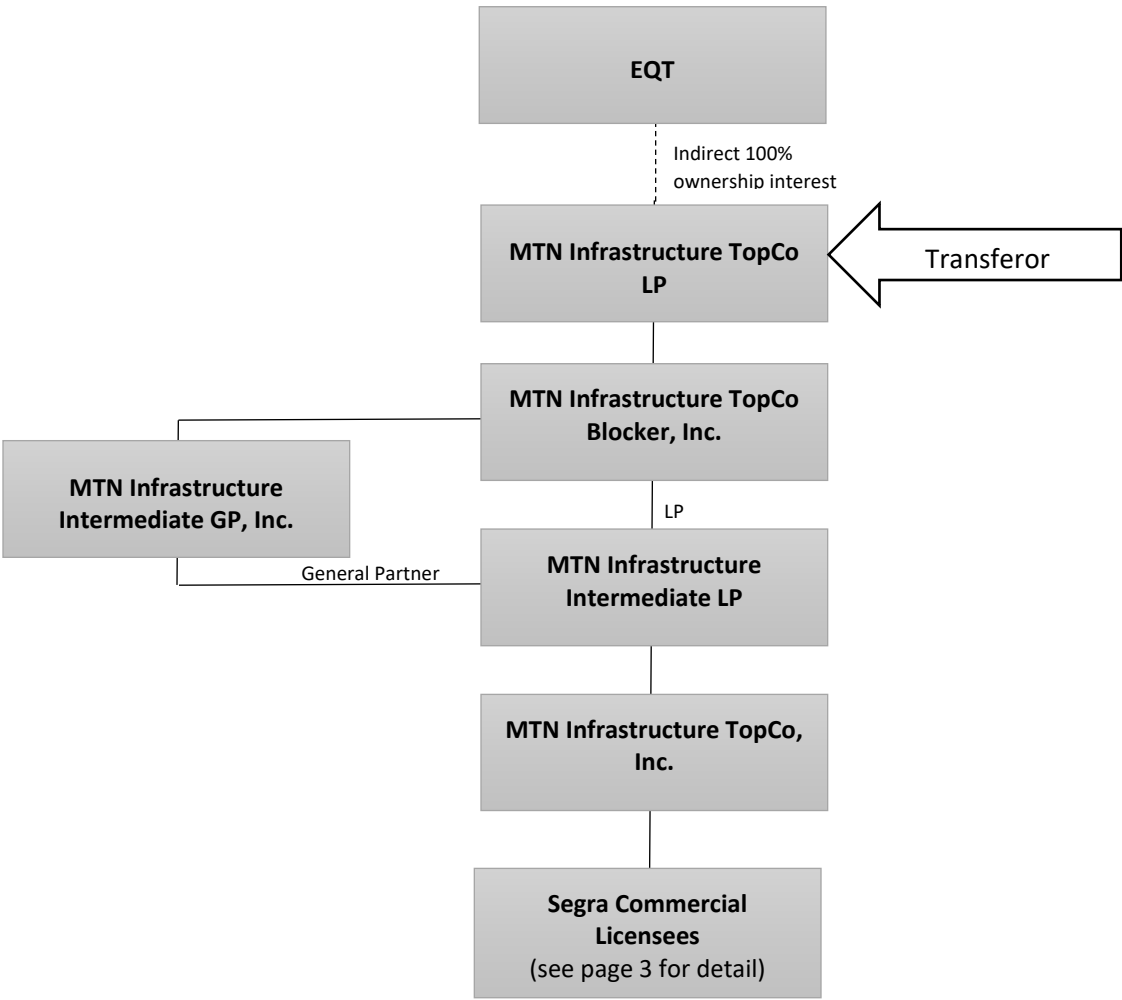
*Counsel for Cox Communications, Inc.*

June 7, 2021

**EXHIBIT A**

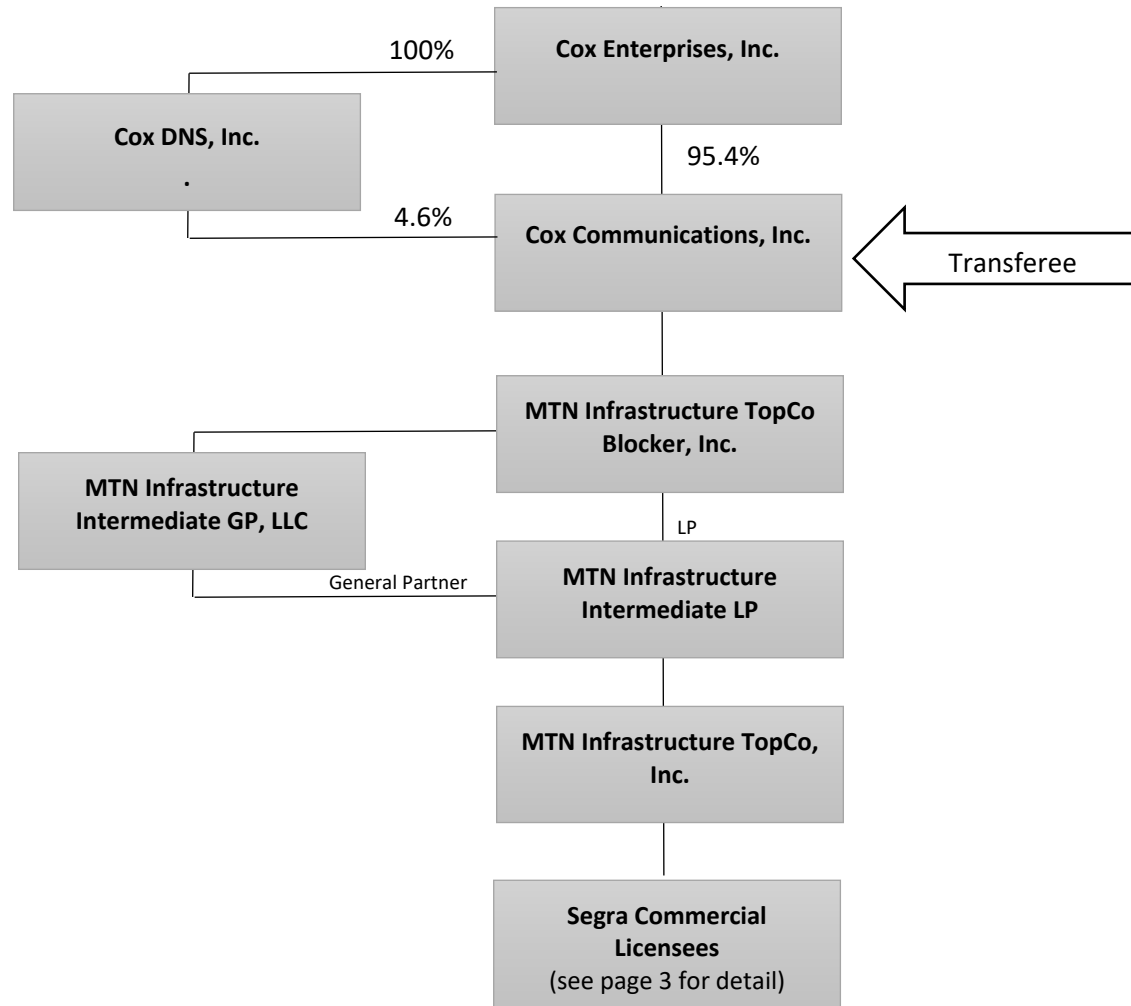
**Pre- and Post-Closing Organizational Charts**

**Exhibit A: Pre-Merger Ownership Structure of Segra Commercial Licensees**



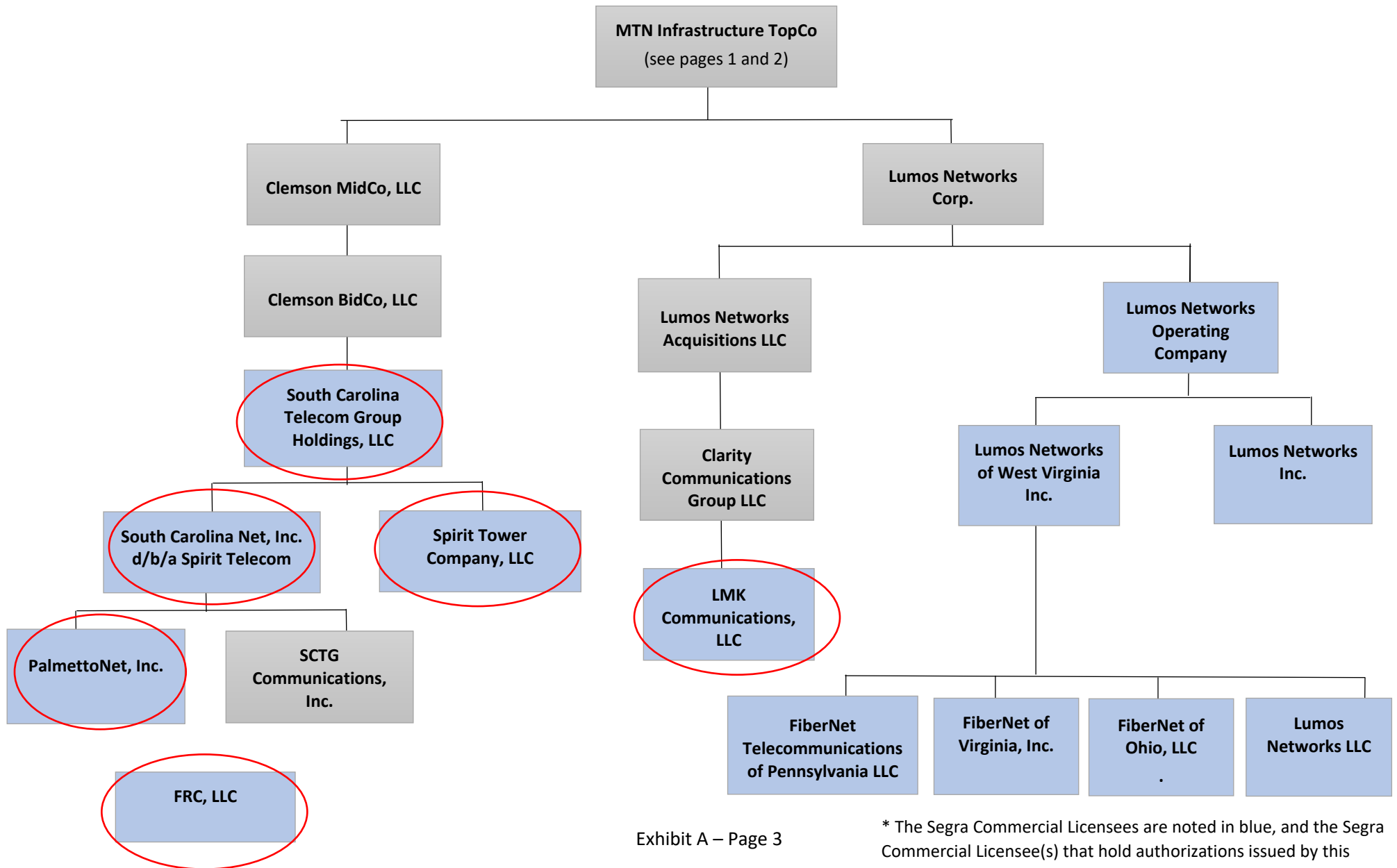
\* The relevant ownership structure of EQT is a matter of record before the Commission and is not included on this chart because EQT will not hold an ownership interest in the Segra Commercial Licensees after the Merger is consummated.

**Exhibit A: Post-Merger Ownership Structure of Segra Commercial Licensees**





**Exhibit A: Pre- and Post- Merger Ownership Structure of Segra Commercial Licensees\***



\* The Segra Commercial Licensees are noted in blue, and the Segra Commercial Licensee(s) that hold authorizations issued by this Commission are circled in red.  
The Merger is not anticipated to result in any material changes to the ownership structure of the Segra Commercial Licensees as depicted herein.

**EXHIBIT B**

**Verifications**

STATE OF Georgia )  
COUNTY OF Fulton )

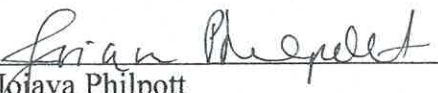
**VERIFICATION**

I, Joiava Philpott, hereby declare that:

- (1) I am Joiava Philpott, Senior Vice President and General Counsel of Cox Communications, Inc.;
- (2) I am authorized to make this verification on behalf of Cox Communications, Inc.;
- and
- (3) The statements in the foregoing Application relating to Cox Communications, Inc. are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26<sup>th</sup> day of May, 2021.

  
Joiava Philpott  
Senior Vice President and General Counsel  
Cox Communications, Inc.

SWORN TO AND SUBSCRIBED before me on the 26<sup>th</sup> day of May, 2021.

  
Notary Public

My commission expires: 12/08/2024



COMMONWEALTH OF VIRGINIA                   §  
   §  
COUNTY/CITY OF WAYNESBORO           §

**VERIFICATION**

I, Mary McDermott state that I am Senior Vice President, General Counsel and Secretary of LMK Communications, LLC dba Segra; PalmettoNet Inc. dba Segra; South Carolina Net Inc. dba Segra; Spirit Tower Company LLC dba Segra; and South Carolina Telecommunications Group Holdings LLC d/b/a Segra; (collectively the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company is true and correct to the best of my knowledge, information, and belief.

*Mary McDermott*

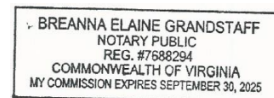
Name: Mary McDermott  
Title: Senior Vice President, General Counsel and Secretary  
LMK Communications, LLC dba Segra; PalmettoNet Inc. dba  
Segra; South Carolina Net Inc. dba Segra; Spirit Tower  
Company LLC dba Segra; South Carolina Telecommunications  
Group Holdings LLC d/b/a Segra

Sworn and subscribed before me this date May 25, 2021.

*Breanna E. Grandstaff*

Notary Public

My commission expires September 30, 2025



STATE OF CALIFORNIA

§  
§  
§

COUNTY OF NAPA

**VERIFICATION**

I, Richard Brode, state that I am Treasurer of MTN Infrastructure TopCo GP LLC the General Partner of Transferor MTN Infrastructure TopCo LP, (the "Company"); that I am authorized to make this Verification on behalf of the Company, its affiliates and its subsidiaries; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein regarding the Company, its affiliates, and its subsidiaries are true and correct to the best of my knowledge, information, and belief.



Name: Richard Brode

Title: Treasurer, MTN Infrastructure TopCo  
GP LLC

On behalf of MTN Infrastructure TopCo LP  
by its General Partner, MTN Infrastructure  
TopCo GP LLC

Sworn and subscribed before me this date: June 1, 2021.

see attached California Jurat. C.F.

Notary Public

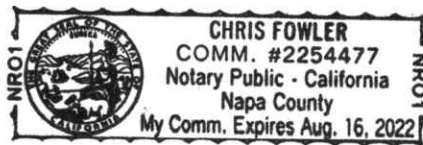
My commission expires 8.16.2022

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of Napa

Subscribed and sworn to (or affirmed) before me on this 1  
day of June, 2021, by Richard G. Brode

proved to me on the basis of satisfactory evidence to be the  
person(s) who appeared before me.



(Seal)

Signature