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Via Alternative Electronic Filing
Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Re: Docket No. 26978 - Notice of Pro Forma Reorganization of
Network Innovations, LLC;

Ms. Tanner:

By this letter, Network Innovations, LLC ("Nitel" or "Licensee") hereby notifies the Georgia Public Service Commission ("Commission") of a planned *pro forma* internal reorganization involving the elimination of certain intermediary holding companies in its chain of ownership. The elimination of these intermediary holding companies will have no effect on the Licensee, its operations, or its ultimate ownership. Because Commission approval of this *pro forma* internal reorganization is not required, this letter is submitted for informational purposes, and no further action is required.

I. DESCRIPTION OF THE ENTITIES

A. Network Innovations, LLC (Applicant)

Nitel is a Delaware limited liability company with headquarters located at 1701 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103. Nitel holds a Certificate of Authority issued in Docket No. 26978.

Nitel is a competitive provider of cloud-based connectivity and security solutions to mid-market enterprise and wholesale customers. Nitel provides resold competitive communications and managed services, such as private line data transport and VoIP service,[1] in the highly

[1] Pursuant to O.G.C.A. § 46-5-222(a) VoIP services are outside the Commission's jurisdiction and regulatory authority.

competitive commercial and wholesale services market. Nitel has no facilities in Georgia, serves no residential customers, and does not offer traditional telephone service in the state.

B. NI Topco, Inc. (First Intermediary Holding Company)

NI Topco, Inc. is a Delaware corporation with headquarters located at 1701 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103. It holds 100% of Nitel.

C. Nitro Intermediate, Inc. (Second Intermediary Holding Company)

Nitro Intermediate, Inc. is a Delaware corporation with headquarters located at 1701 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103. It holds 100% of NI Topco, Inc.

D. Nitro Holdco, Inc. (Third Intermediary Holding Company)

Nitro Holdco, Inc. is a Delaware corporation with headquarters located at 1701 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103. It holds 100% of Nitro Intermediate, Inc.

E. Comcast Business Communications, LLC (Parent Company)

Comcast Business Communications, LLC ("CBC") is a Pennsylvania limited liability company with a principal place of business located at 1701 John F. Kennedy Boulevard, Philadelphia, PA 19103. CBC holds 100% of Nitro Holdco, Inc. CBC is an indirect, wholly owned subsidiary of Comcast Corporation, a global media and technology company and a leading provider of video, high-speed Internet, digital voice, and other next-generation services and technologies to millions of businesses and residential customers nationwide.

CBC and its affiliates offer a full suite of business solutions including fast, reliable connectivity, secure networking solutions and advanced cybersecurity, and a range of managed service options marketed under the Comcast Business brand. They also provide businesses with ethernet network services, which connect multiple locations and provide higher downstream and upstream speed options, advanced voice services, and a software-defined networking product. Larger enterprises may also receive support services related to Wi-Fi networks, router management, network security, business continuity risks and other services.

CBC is also active in the interstate wholesale business, particularly cellular backhaul services. These services help wireless carriers transport wireless traffic from their cell towers.

F. Current Ownership Structure

As described above, Nitel is currently an indirect subsidiary of CBC through several intermediary holding companies. The current ownership chain is as follows: Comcast Business Communications, LLC holds a 100% direct interest in Nitro Holdco, Inc., which in turn holds a 100% direct interest in Nitro Intermediate, Inc., which in turn holds a 100% direct interest in NI Topco, Inc., which in turn holds a 100% direct interest in Network Innovations, LLC. Each entity in this chain is wholly owned by its immediate parent.

The three intermediate entities—Nitro Holdco, Inc., Nitro Intermediate, Inc., and NI Topco, Inc.—were inherited as part of CBC's prior acquisition of the Nitel business and serve no current operational, managerial, or business function. They are inactive holding entities maintained solely for historical corporate-structural reasons.

II. DESCRIPTION OF THE INTERNAL *PRO FORMA* REORGANIZATION

The planned *pro forma* reorganization is a simple internal corporate reorganization (the "Reorganization") where CBC will eliminate the three intermediate holding companies—Nitro Holdco, Inc., Nitro Intermediate, Inc., and NI Topco, Inc.—that currently sit between CBC and Nitel in the corporate ownership chain. Upon completion of the Reorganization, which is expected to occur on October 1, 2026, Nitel will become a direct, wholly owned subsidiary of CBC. Diagrams showing the current and planned ownership structure of Nitel are attached as Exhibit A.

No third party is being brought into the ownership structure, and no sale, transfer, or assignment of Nitel's assets, customer base, or business operations to any outside entity is involved. Nor is there any debt issuance subject to O.C.G.A. §46-2-28. The ultimate beneficial ownership and control of Nitel by Comcast Corporation, an indirect parent of CBC, will remain unchanged before and after the Reorganization.

This Reorganization will simplify Nitel's corporate structure, thereby enhancing regulatory transparency, corporate governance efficiency, and administrative clarity. The Reorganization will not result in any changes to Nitel's current operations or to the rates, terms and conditions of service provided to customers. Nitel will continue to operate as a certificated provider of competitive managed services, telecommunications, and VoIP services in Georgia. Accordingly, the reorganization poses no risk of harm to competition, employees, or consumers in Georgia.

III. CONCLUSION

Should you have any questions regarding this submission, please do not hesitate to contact the undersigned.

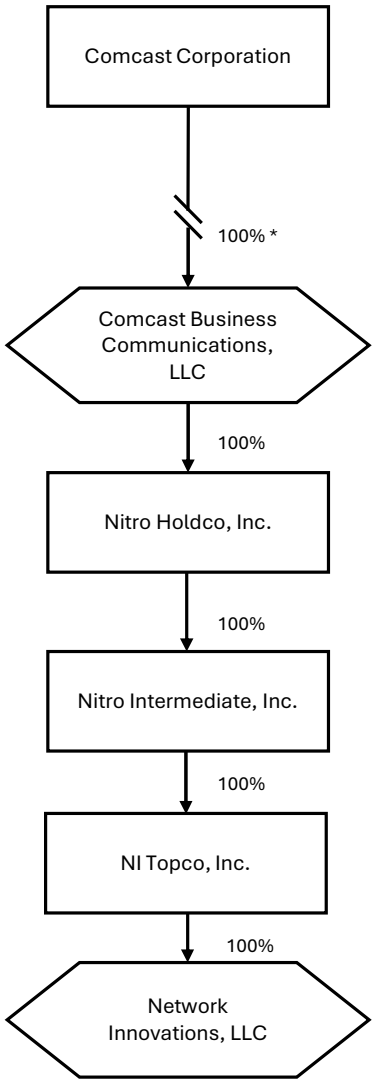
Respectfully submitted,

NETWORK INNOVATIONS, LLC

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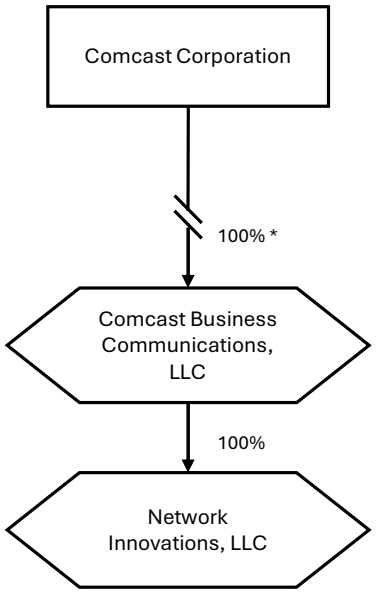
Counsel for Network Innovations, LLC

Pre-close Corporate Structure Chart for
Pro Forma Reorganization of Network Innovations, LLC



* The line break indicates additional indirect ownership.

Post-close Corporate Structure Chart for
Pro Forma Reorganization of Network Innovations, LLC



* The line break indicates additional indirect ownership.