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October 14, 2026

Via E-Filing and Overnight Courier

Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334-9052

Re: Notification of Fiber AssetCo LLC Regarding (1) a *Pro Forma* Restructuring of Fiber AssetCo LLC and (2) Fiber AssetCo LLC's Participation in Certain Financing Arrangements

Dear Secretary Tanner:

By this letter, Fiber AssetCo LLC ("Fiber AssetCo") notifies the Georgia Public Service Commission of (1) a *pro forma* change in Fiber AssetCo's ownership structure (the "*Pro Forma* Restructuring") and (2) Fiber AssetCo's participation in certain Financing Arrangements (as defined below).

Fiber AssetCo respectfully submits that Commission approval is not required for the *Pro Forma* Restructuring[1] or Fiber AssetCo's participation in the Financing Arrangements.[2] In support of this Notification, Fiber AssetCo provides the following information:

Description of Fiber AssetCo LLC

Fiber AssetCo is a Delaware limited liability company with its principal office at 1401 Wynkoop Street, Suite 500, Denver, CO 80202. In Georgia, Fiber AssetCo is authorized by the Commission to provide

[1] *See* Georgia Public Service Commission Telecommunications Unit Financing Authority Requirements and Procedures (rev. July 28, 2021) (among the "transactions [that] do not require formal approval by the Commission" are "[m]ergers, acquisitions, or transfers of control that do not involve the issuance of stocks, bonds, notes, or other evidences of debt payable more than 12 months after the date of issuance").

[2] The Financing Arrangements described herein qualify for the exemption from approval provided by O.C.G.A. § 46-2-28(g) because the debt transaction is an interstate transaction as evidenced by the following: (i) Fiber AssetCo is headquartered and domiciled outside of Georgia, (ii) the Financing Arrangements are expected to be between Zayo Issuer, LLC ("Zayo Issuer") (Fiber AssetCo's direct parent upon completion of the *Pro Forma* Restructuring) as the primary obligor and a national bank or other lending or financial institution licensed or authorized to enter into such Financing Arrangements by a state or federal agency and (iii) Fiber AssetCo will provide a guarantee and pledge of assets as collateral or other security to the lenders in order to accommodate the Financing Arrangements of the primary obligor.

facilities-based competitive local exchange telecommunications services under Certificate No. L-7999, and intraLATA and interLATA intrastate telecommunications services under Certificate No. X-7998, granted in Docket Nos. 56279 and 56280 on August 5, 2025.

Fiber AssetCo currently is a direct, wholly owned subsidiary of Fiber NewCo LLC ("NewCo"), which, in turn, is an indirect wholly owned subsidiary of Front Range Intermediate, Inc. ("Front Range Intermediate"), as acknowledged by the Commission in Docket Nos. 41721 and 56279 on July 9, 2025. Front Range Intermediate also indirectly, wholly owns Zayo Group, LLC ("Zayo Group")[3] and its subsidiaries, including Zayo Issuer.[4] Front Range Intermediate, in turn, is indirectly, wholly owned by Front Range JV, LP ("JV LP"), a Delaware limited partnership that is controlled by its general partner, Front Range JV GP, LLC ("JV GP").[5]

Fiber AssetCo and its affiliates are a leading U.S. provider of bandwidth infrastructure and interconnection services over regional and metropolitan fiber networks. These services enable customers to manage, operate, and scale their telecommunications and data networks. Fiber AssetCo's customers consist primarily of wireless service providers, national and regional communications service providers, media, Internet, and content companies, government agencies, banks, and other bandwidth-intensive enterprises.

Designated Contacts

Questions, correspondence, or other communications concerning this filing should be directed to:

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With a copy to:

Lauren Lantero
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lauren.lantero@zayo.com

Description of the *Pro Forma* Restructuring

The *Pro Forma* Restructuring involves a series of intra-company transactions that will result in a change in the direct and indirect ownership and control of Fiber AssetCo without any change to its

[3] In Georgia, Zayo Group is authorized to provide competitive local exchange telecommunications services under Certificate No. L-0496 and interexchange telecommunications services under Certificate No. X-1103, granted in Docket Nos. 33613 and 33615 on March 17, 2011. The *Pro Forma* Restructuring will not result in a change to the direct or indirect ownership or control of Zayo Group.

[4] Zayo Issuer directly and wholly owns Zayo Network Services, LLC ("Zayo-NS"), which is authorized in Georgia to provide facilities-based and resold competitive local exchange telecommunications services under Certificate No. L-8000, and intraLATA and interLATA intrastate telecommunications services under Certificate No. X-8001, granted in Docket Nos. 56314 and 56315 on September 4, 2025. The *Pro Forma* Restructuring will not result in a change to the direct or indirect ownership or control of Zayo-NS.

[5] Additional information regarding the direct and indirect ownership and control of Fiber AssetCo and its owners is a matter of public record in Docket No. 56279.

ultimate ownership and control. Specifically, upon completion of the *Pro Forma* Restructuring, Fiber AssetCo will no longer be a direct, wholly owned subsidiary of NewCo and instead will be an indirect, wholly owned subsidiary of Zayo Group and a direct, wholly owned subsidiary of Zayo Issuer. Fiber AssetCo will remain an indirect, wholly owned subsidiary of Front Range Intermediate. A chart illustrating the pre- and post-*Pro Forma* Restructuring ownership structure of Fiber AssetCo is included as **Exhibit A**.

As noted, the *Pro Forma* Restructuring will not result in any changes to the ultimate ownership or control of Fiber AssetCo and Fiber AssetCo will continue to conduct its operations and provide its services as it does currently. As such, Fiber AssetCo's customers will not be impacted by these changes.

Description of the Financing Arrangements

Fiber AssetCo expects to participate in existing, new, amended or restated financing arrangements ("Financing Arrangements"). Fiber AssetCo will not be a direct borrower under the Financing Arrangements. Instead, Fiber AssetCo will guarantee loans incurred, or to be incurred, by Zayo Issuer and pledge its assets as security for the Financing Arrangements.

The Financing Arrangements may include one or more of the following debt instruments: notes or debentures (including notes convertible into equity and private notes that may be exchanged for public notes); conventional credit facilities, such as revolving credit facilities and term loans; letters of credit; and bridge loans; or a combination thereof. The Financing Arrangements may be secured or unsecured facilities and may be guaranteed by affiliates of the borrower/issuer.

The Financing Arrangements may be used for (i) acquisitions, (ii) refinancing then-existing debt, (iii) funding capital to support growth capital needs, including those of Fiber AssetCo, and (iv) providing working capital to fund general corporate purposes. The rates, terms and conditions, maturity dates, and dates of issuance will be determined by market conditions and lenders' requirements at the time of each issuance.

Public Interest Considerations

The *Pro Forma* Restructuring is in the public interest. The *Pro Forma* Restructuring seeks to adjust the corporate structure for administrative and operational efficiencies as well as to integrate Fiber AssetCo into the larger financial structure of Zayo. The *Pro Forma* Restructuring involves only a change in the direct and intermediate holding company structure of Fiber AssetCo. The *Pro Forma* Restructuring will not change day-to-day working control of Fiber AssetCo, which will continue to be overseen by its existing management team. After the *Pro Forma* Restructuring, Fiber AssetCo will remain technically and managerially qualified to provide competitive telecommunications services in the State of Georgia. Fiber AssetCo's operations will be directed by the existing corporate management, technical, and operations staffs responsible for the operations of Fiber AssetCo today. Thus, there will be no impact on the employees of Fiber AssetCo, and Fiber AssetCo will continue to possess the requisite resources to provide high-quality telecommunications services in Georgia.

The *Pro Forma* Restructuring also will be invisible to customers and will not result in any change to their services. The telecommunications services provided by Fiber AssetCo and the rates, terms and conditions of those services will not change as a result of the *Pro Forma* Restructuring, and Fiber AssetCo's Georgia customers will not be affected in any way by the *Pro Forma* Restructuring. Accordingly, there will be no impact on Fiber AssetCo's provision of safe and adequate utility service at just and reasonable rates. The above facts demonstrate that the *Pro Forma* Restructuring is in the public interest.

The Financing Arrangements will similarly serve the public interest. The Financing Arrangements will provide support for the operations and network serving Fiber AssetCo's customers and will promote competition among telecommunications carriers by providing Fiber AssetCo with access to financial resources that will allow it to be an effective competitor. The Financing Arrangements are necessary and appropriate, are consistent with the performance by Fiber AssetCo of its services to the public, will not impair its ability to perform such services, and will promote its corporate purposes. The Financing Arrangements will have no adverse impact on the customers of Fiber AssetCo and will not disrupt service or cause customer confusion or inconvenience.

Conclusion

For the foregoing reasons, Fiber AssetCo submits that the public interest, convenience, and necessity would be furthered by the *Pro Forma* Restructuring and Fiber AssetCo's participation in the Financing Arrangements. Fiber AssetCo respectfully requests that the Commission issue a letter acknowledging the *Pro Forma* Restructuring and Fiber AssetCo's participation in the Financing Arrangements.

This filing is being submitted via e-filing and overnight courier. Please date stamp the extra copy of the letter submitted via overnight courier and return it in the stamped envelope provided. Should you have any questions concerning this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Patricia Cave
Patricia Cave
Joshua M. Bobeck
Micah A. Leval

Counsel for Fiber AssetCo LLC

EXHIBIT A

Current and Post-*Pro Forma* Restructuring Ownership Structure Charts

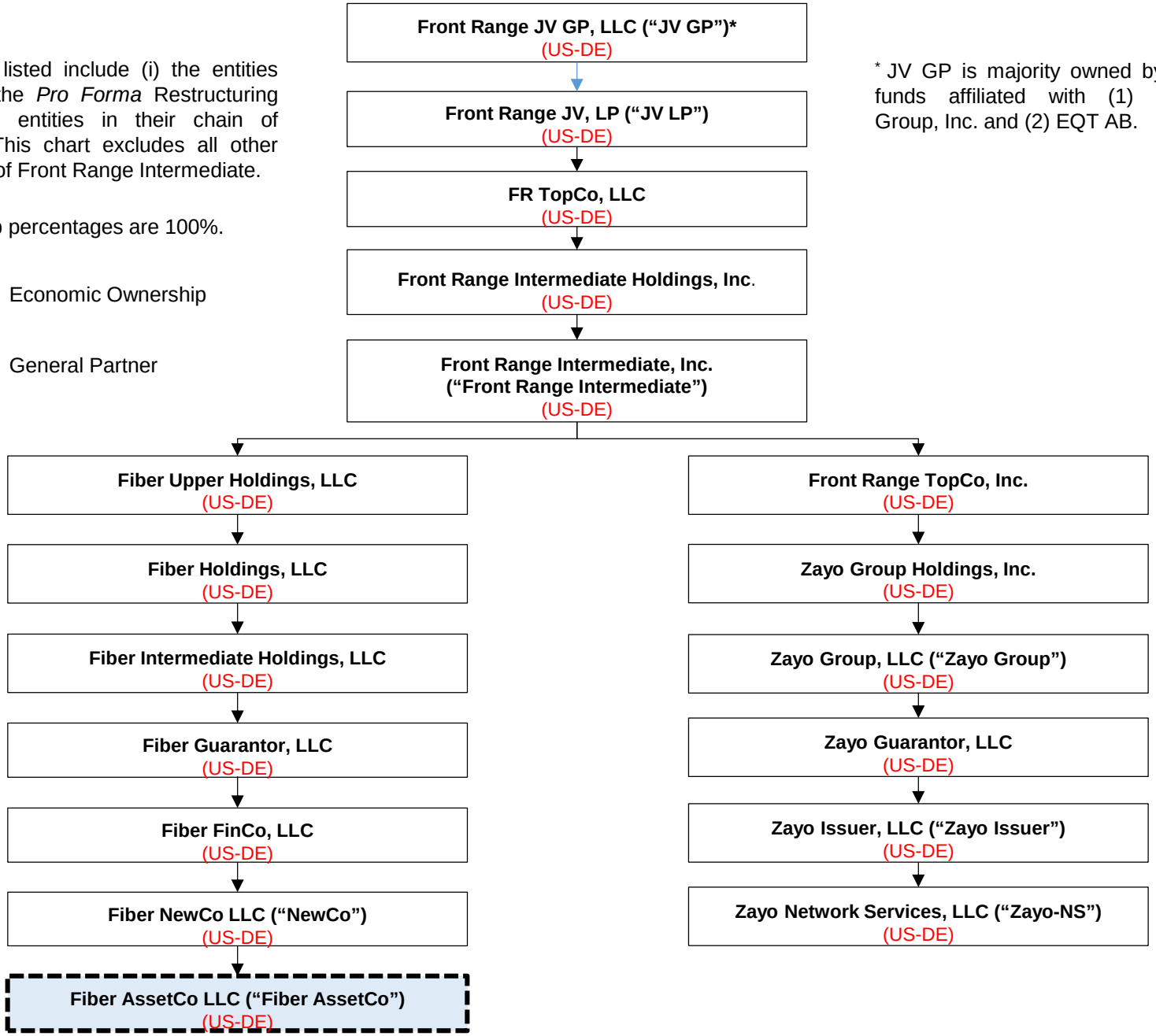
Current Ownership Structure of Fiber AssetCo LLC

The entities listed include (i) the entities involved in the *Pro Forma* Restructuring and (ii) the entities in their chain of ownership. This chart excludes all other subsidiaries of Front Range Intermediate.

All ownership percentages are 100%.

→ Economic Ownership

→ General Partner



* JV GP is majority owned by investment funds affiliated with (1) DigitalBridge Group, Inc. and (2) EQT AB.

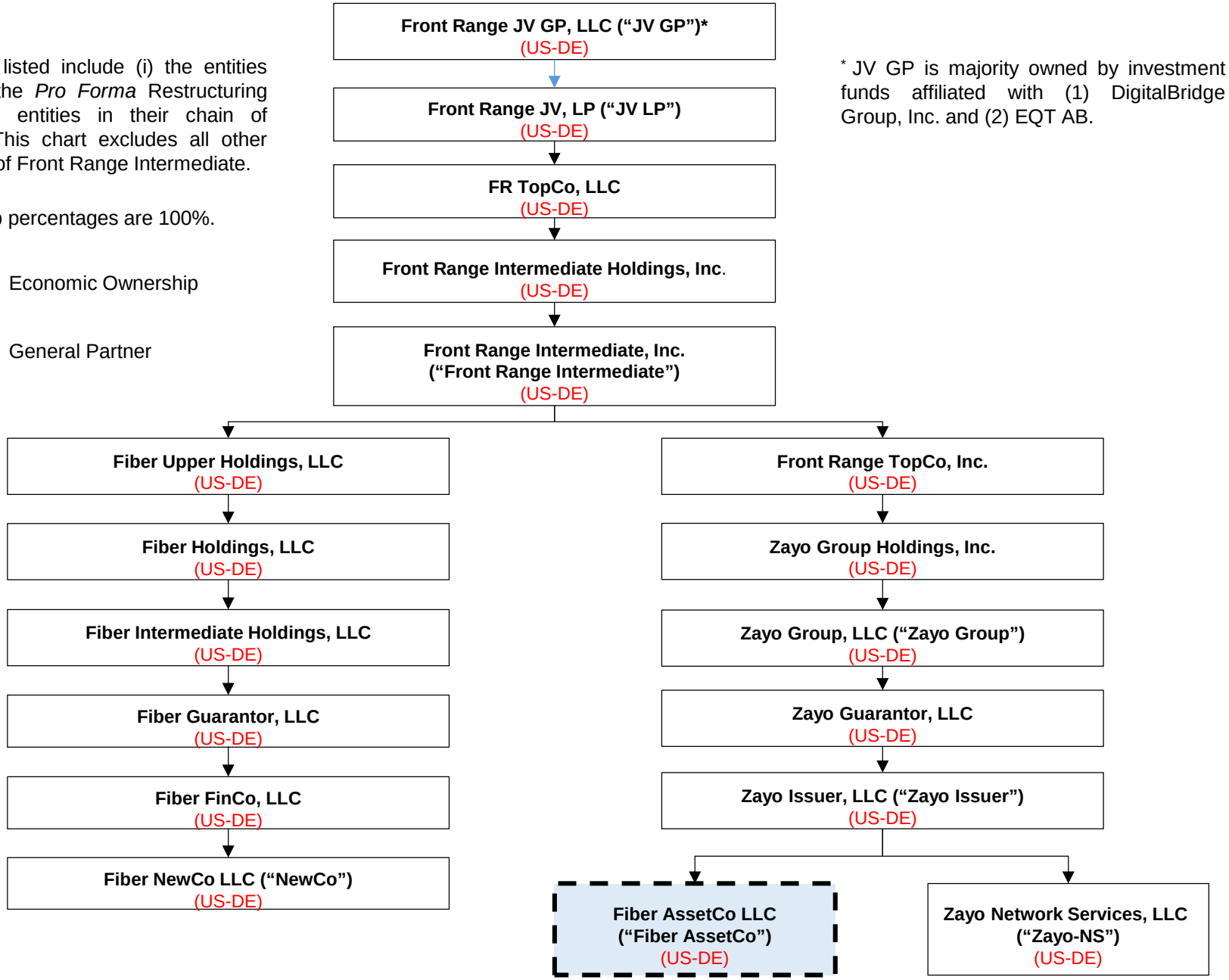
Post-*Pro Forma* Restructuring Ownership Structure of Fiber AssetCo LLC

The entities listed include (i) the entities involved in the *Pro Forma* Restructuring and (ii) the entities in their chain of ownership. This chart excludes all other subsidiaries of Front Range Intermediate.

All ownership percentages are 100%.

→ Economic Ownership

→ General Partner



* JV GP is majority owned by investment funds affiliated with (1) DigitalBridge Group, Inc. and (2) EQT AB.

VERIFICATION

STATE OF COLORADO §
§
COUNTY OF DENVER §

I, Lauren Lantero, state that I am Chief Legal Officer and Secretary of Fiber AssetCo LLC (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 with respect to the Company are true and correct to the best of my knowledge, information and belief.

Lauren Lantero
Chief Legal Officer and Secretary
Fiber AssetCo LLC

SWORN TO AND SUBSCRIBED before me on the 13th day of October, 2026.

Notary Public

My commission expires: 3-7-28

KARA LENA MATHIS
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20244009833
MY COMMISSION EXPIRES 03/07/2028