

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Citizens Telecommunications Company of)	
Idaho, Citizens Telecommunications)	
Company of Montana and Frontier)	
Communications Northwest Inc.,)	
<i>Petitioners/Licensees</i>)	
)	
and)	File No. ISP-PDR-20190708-00006
)	
Northwest Fiber, LLC,)	
<i>Petitioner/Transferee</i>)	
)	
Petition for Declaratory Ruling Under)	
Section 310(b)(4) of the Communications)	
Act of 1934, as Amended)	

SUPPLEMENT TO JOINT PETITION FOR DECLARATORY RULING

On June 28, 2019, Citizens Telecommunications Company of Idaho, Citizens Telecommunications Company of Montana and Frontier Communications Northwest Inc. (collectively, the “Licensees”) and Northwest Fiber, LLC (“Northwest Fiber” or the “Transferee”) (collectively, the “Petitioners”), petitioned the Commission for a declaratory ruling that it would serve the public interest to permit indirect foreign ownership of the Licensees, which currently hold certain FCC common carrier radio station licenses. Specifically, the Petitioners sought approval of a group of investment funds domiciled in the Cayman Islands and ultimately controlled by Searchlight Capital Partners II GP, LLC, a Delaware limited liability company. Included amongst this group of Cayman funds was Searchlight Capital II OPT GP (Cayman).

Upon a request from the Commission, and after our further review, we recognize that Searchlight Capital II OPT GP (Cayman) was inadvertently included in our June 28, 2019 filing. It is a remnant entity that no longer exists. Therefore, we respectfully request that the Commission disregard its inclusion wherever its name appears in our filing.

You have also asked us to update the comprehensive post-closing structure chart to include both

equity and voting interests. Enclosed is a revised comprehensive post-closing structure chart that reflects your requested changes.

Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ William F. Maher

William F. Maher

Brian W. Murray

Jennifer L. Kostyu

Wilkinson Barker Knauer, LLP

1800 M Street, N.W., Suite 800N

Washington, D.C. 20036

202.783.4141 (tele.)

202.783.5851 (fax)

WMaher@wbklaw.com

BMurray@wbklaw.com

JKostyu@wbklaw.com

Counsel to the Licensees

/s/ Patrick S. Campbell

Patrick S. Campbell

Sean Heiden

Milbank LLP

1850 K Street, N.W., Suite 1100

Washington, D.C. 20006

202.835.7555 (tele.)

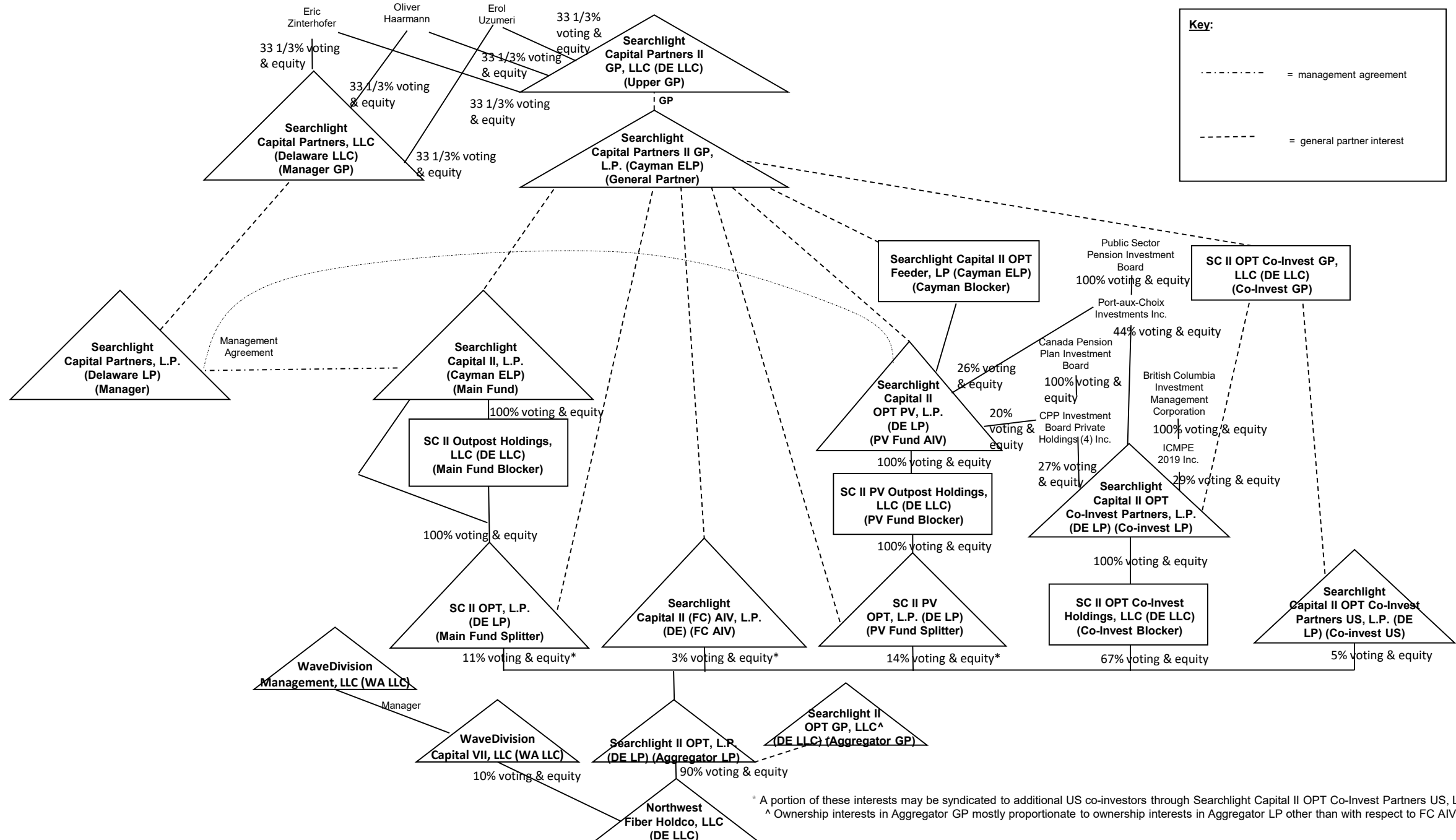
202.263.7586 (fax)

pcampbell@milbank.com

sheiden@milbank.com

Counsel to Northwest Fiber, LLC

Comprehensive Post-Closing Structure Chart (Upper Tier)



* A portion of these interests may be syndicated to additional US co-investors through Searchlight Capital II OPT Co-Invest Partners US, L.P.
 ^ Ownership interests in Aggregator GP mostly proportionate to ownership interests in Aggregator LP other than with respect to FC AIV.