

March 2, 2021

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

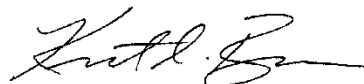
*Re: EagleCrest CUB GP Inc. and Draden Investors, LLC, Transferees; Conterra Ultra Broadband, LLC, Network USA, LLC, and Detel Wireless, LLC, Licensees: Section 310(b)(4) Petition for Declaratory Ruling, File No. ISP-PDR-20200728-00006*

Dear Ms. Dortch:

Through counsel, EagleCrest CUB GP Inc. (“EagleCrest CUB GP”) supplements the above-referenced Petition for Declaratory Ruling (“Petition”) requesting that the Commission permit up to 100-percent indirect aggregate foreign investment in Conterra Ultra Broadband, LLC, Network USA, LLC, and Detel Wireless, LLC (collectively, “Licensees”) in connection with the acquisition of control of Licensees’ immediate parent, CUB Parent, Inc. by EagleCrest CUB GP and Draden Investors, LLC. EagleCrest CUB GP submits this supplement to provide the attached certifications of EagleCrest CUB GP and Fiera Infra GP Inc. (“Fiera Infra”), which confirm that no foreign limited partner in EagleCrest Portfolio Holdings LP, EagleCrest CUB LP, EagleCrest CUB Co-Investment LP, or CSC CUB Holdings LP is (or will) have any active involvement in those limited partnerships, the Licensees, or the Licensees’ U.S. parents.

Should you have any questions regarding the information provided herein, please contact Kent Bressie by telephone at +1 202 730 1337 or by e-mail at kbressie@hwglaw.com.

Yours sincerely,



Kent Bressie  
Colleen Sechrest  
*Counsel for EagleCrest CUB GP Inc.*

Attachments

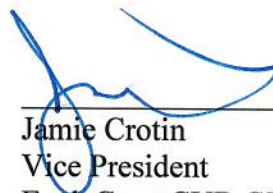
cc: David Kretch  
Kimberly Cook  
Leah Kim

## CERTIFICATION OF EAGLECREST CUB GP INC.

I, Jamie Crotin, Vice President of EagleCrest CUB GP Inc. (“EagleCrest CUB GP”), submit this certification in connection with the Petition for Declaratory Ruling submitted July 28, 2020, ISP-PDR-20200728-00006, as supplemented on August 11, 2020 and October 6, 2020 (together, the “Petition”) requesting Commission approval for indirect foreign investment in Conterra Ultra Broadband, LLC, Detel Wireless, LLC, and Network USA, LLC (collectively, “Licensees”) in excess of the 25-percent threshold established in 47 U.S.C. §310(b)(4). Specifically, I certify as follows:

1. I am authorized to make this certification on behalf of EagleCrest CUB GP, controlling general partner of EagleCrest CUB LP, EagleCrest CUB Co-Investment LP, and, upon receipt of the requisite Commission approval, CSC CUB Holdings LP (each a “Company” and collectively, the “Companies”), each a disclosable interest holder identified in the Petition, as depicted on the diagram attached as Exhibit A.
2. The facts stated in the Petition with respect to each of the Companies are true and correct.
3. Notwithstanding any provision of the Companies’ limited partnership agreements or any other agreement, no limited partner in any Company that is foreign (*i.e.*, non-U.S. citizen or entity organized under the laws of a non-U.S. jurisdiction) that the Commission has not approved (or does not approve through grant of the Petition) pursuant to the foreign ownership rules applicable to common carrier licensees (47 C.F.R. § 1.5000 *et seq.*) or any successor regulation, each as may be amended, is (or will be) actively engaged in the management or operation of the Companies, Licensees, or Licensees’ parent companies, CUB Parent, Inc. and Conterra Ultra Broadband Holdings, Inc. (the “Covered Entities”).
4. Pursuant to this “no active involvement” certification, a foreign limited partner of a Company that the Commission has not specifically approved shall not (a) serve as an officer, director, manager, employee, agent, or similar position for a Covered Entity, with the exception of, in certain circumstances, acting as a surety; (b) be involved directly or indirectly in the policymaking activities of the Covered Entities or in their day-to-day management or operations; or (c) exercise investor rights (or be permitted to vote investment units) on matters beyond the usual and customary investor protections approved by the Commission or identified in 47 C.F.R. § 1.5003, or any successor regulation, each as may be amended. Notwithstanding the foregoing, a foreign limited partner of a Company may offer non-binding advice to the general partner.
5. The foregoing reflects my knowledge and belief based upon reasonable inquiry with the Covered Entities.

I declare, under penalty of perjury, that the foregoing is true and correct. I acknowledge that willful false statements made on this certification are punishable by fine and/or imprisonment (18 U.S.C. § 1001) and/or revocation of any station license (47 U.S.C. § 312(a)(1)) and/or forfeiture (47 U.S.C. §503).



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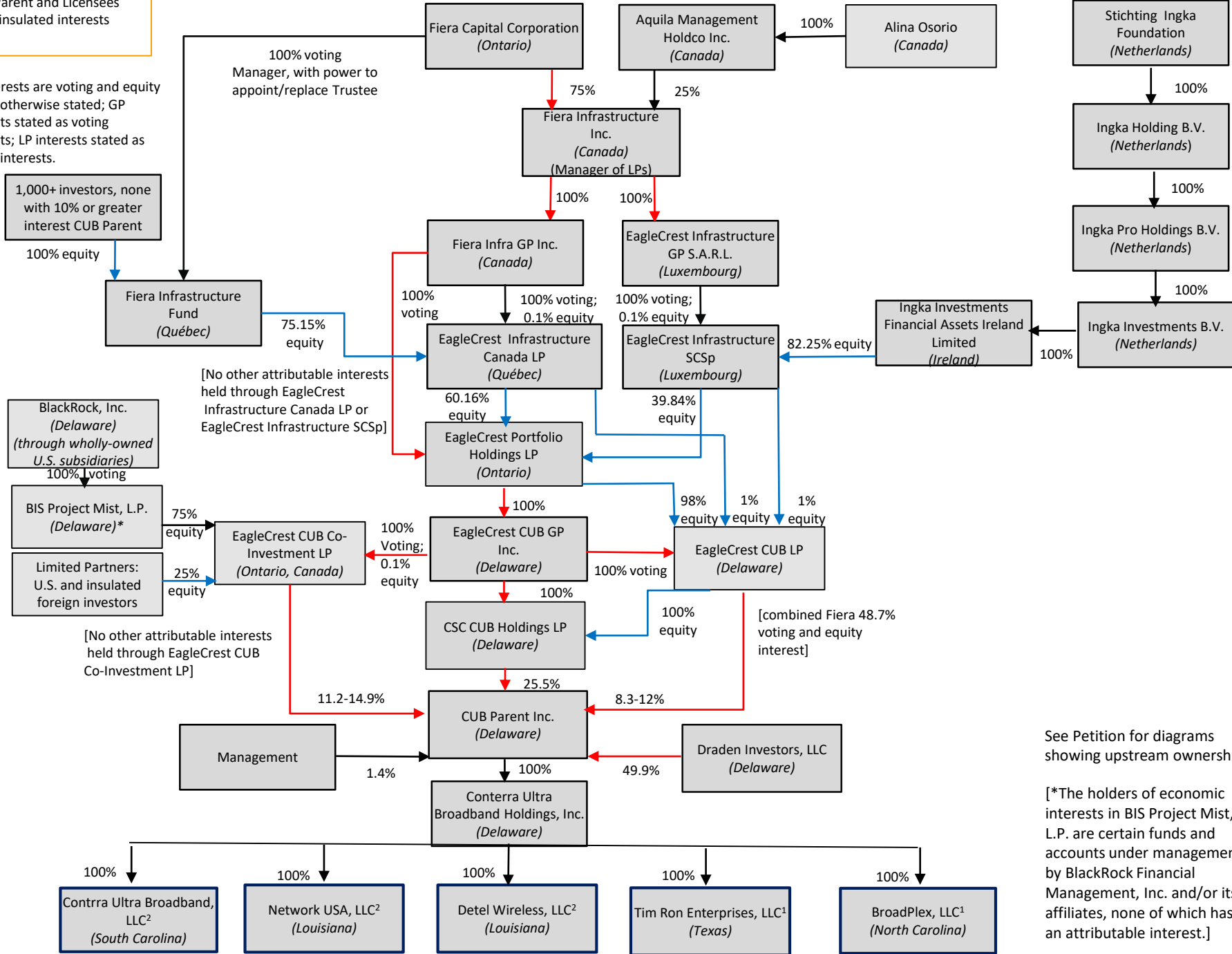
Jamie Crotin  
Vice President  
EagleCrest CUB GP Inc.

Dated: March 2, 2021

# EXHIBIT A: CUB PARENT, INC. POST-CLOSE OWNERSHIP STRUCTURE

**Red:** GP or other control of CUB Parent and Licensees  
**Blue:** insulated interests

All interests are voting and equity unless otherwise stated; GP interests stated as voting interests; LP interests stated as equity interests.



See Petition for diagrams showing upstream ownership

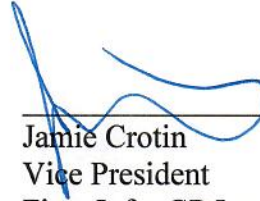
[\*The holders of economic interests in BIS Project Mist, L.P. are certain funds and accounts under management by BlackRock Financial Management, Inc. and/or its affiliates, none of which has an attributable interest.]

## CERTIFICATION OF FIERA INFRA GP INC.

I, Jamie Crotin, Vice President of Fiera Infra GP Inc. (“Fiera Infra”), submit this certification in connection with the Petition for Declaratory Ruling submitted July 28, 2020, ISP-PDR-20200728-00006, as supplemented on August 11, 2020 and October 6, 2020 (together, the “Petition”) requesting Commission approval for indirect foreign investment in Conterra Ultra Broadband, LLC, Detel Wireless, LLC, and Network USA, LLC (collectively, “Licensees”) in excess of the 25-percent threshold established in 47 U.S.C. § 310(b)(4). Specifically, I certify as follows:

1. I am authorized to make this certification on behalf of Fiera Infra, controlling general partner of EagleCrest Portfolio Holdings LP (the “Company”), a disclosable interest holder identified in the Petition, as depicted on the diagram attached as Exhibit A.
2. The facts stated in the Petition with respect to the Company are true and correct.
3. Notwithstanding any provision of the Company’s limited partnership agreement or any other agreement, no Company limited partner that is foreign (*i.e.*, non-U.S. citizen or entity organized under the laws of a non-U.S. jurisdiction) that the Commission has not approved (or does not approve through grant of the Petition) pursuant to the foreign ownership rules applicable to common carrier licensees (47 C.F.R. § 1.5000 *et seq.*), or any successor regulation, each as may be amended, is (or will be) actively involved in the management or operation of the Company, Licensees, or Licensees’ parent companies, CUB Parent, Inc. and Conterra Ultra Broadband Holdings, Inc. (the “Covered Entities”).
4. Pursuant to this “no active involvement” certification, a Company foreign limited partner that has not been specifically approved by the Commission shall not (a) serve as an officer, director, manager, employee, agent, or similar position for a Covered Entity, with the exception of, in certain circumstances, acting as a surety; (b) be involved directly or indirectly in the policymaking activities of the Covered Entities or in their day-to-day management or operations; or (c) exercise investor rights (or be permitted to vote investment units) on matters beyond the usual and customary investor protections approved by the Commission or identified in 47 C.F.R. § 1.5003, or any successor regulation, each as may be amended. Notwithstanding the foregoing, a Company foreign limited partner may offer non-binding advice to the general partner.
5. The foregoing reflects my knowledge and belief based upon reasonable inquiry with the Covered Entities.

I declare, under penalty of perjury, that the foregoing is true and correct. I acknowledge that willful false statements made on this certification are punishable by fine and/or imprisonment (18 U.S.C. § 1001) and/or revocation of any station license (47 U.S.C. § 312(a)(1)) and/or forfeiture (47 U.S.C. §503).



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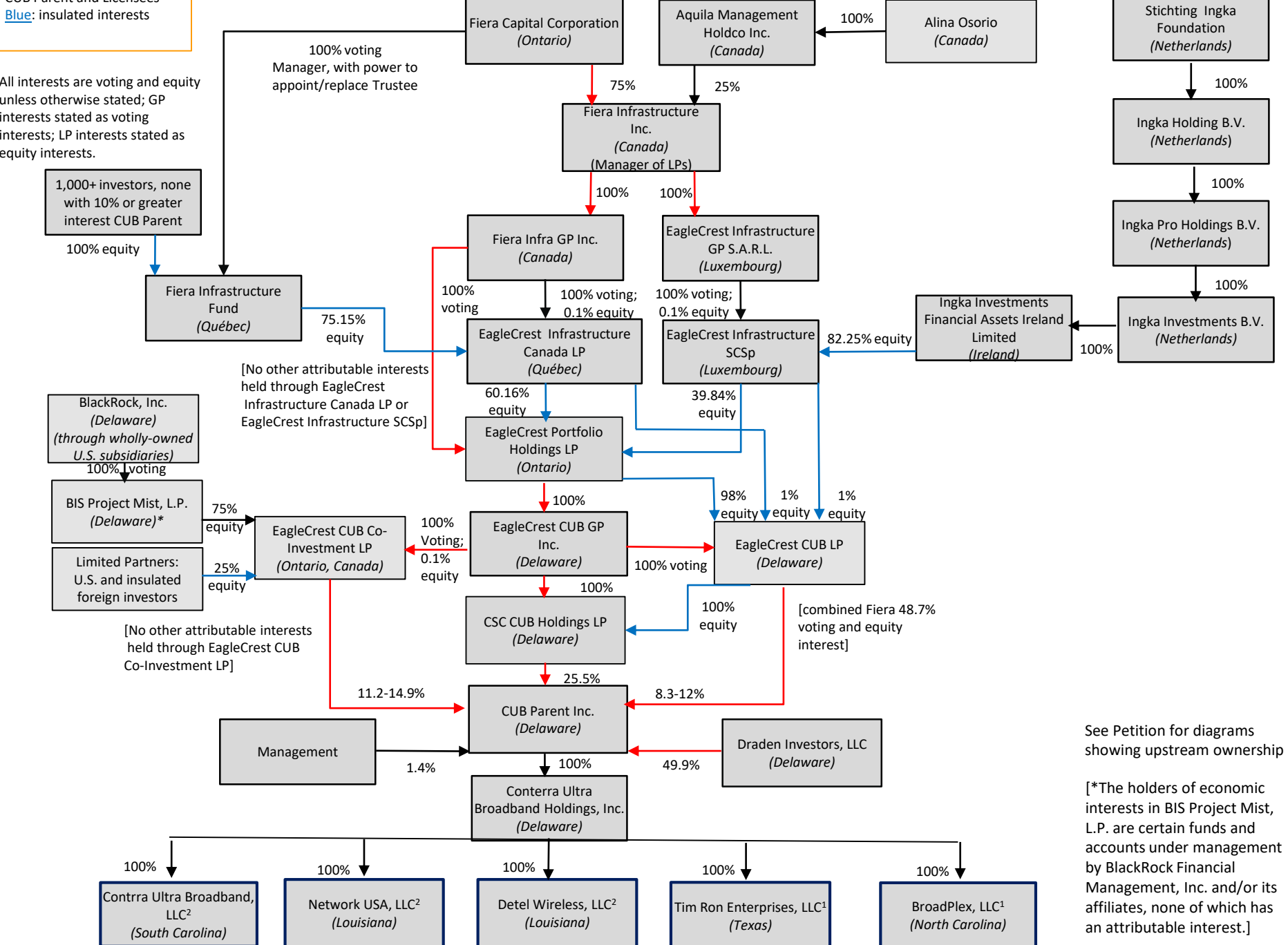
Jamie Crotin  
Vice President  
Fiera Infra GP Inc.

Dated: March 2, 2021

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All interests are voting and equity unless otherwise stated; GP interests stated as voting interests; LP interests stated as equity interests.



See Petition for diagrams showing upstream ownership

[\*The holders of economic interests in BIS Project Mist, L.P. are certain funds and accounts under management by BlackRock Financial Management, Inc. and/or its affiliates, none of which has an attributable interest.]