Morgan Lewis

Catherine Wang
Danielle Burt
catherine.wang@morganlewis.com
danielle.burt@morganlewis.com

July 20, 2022

VIA IBFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, N.E.
Washington, DC 20554
Attn: International Bureau

Re: Notice of a *Pro Forma* Realignment of PrimeLink, Inc. into FirstLight Fiber, Inc. and *Pro Forma* Transfer of Control of FirstLight Fiber, Inc.

Dear Secretary Dortch:

FirstLight Fiber, Inc. ("FirstLight"), pursuant to 47 C.F.R. § 63.24(f), notifies the Commission of the *pro forma* realignment of PrimeLink, Inc. ("PrimeLink") and its international Section 214 authorizations (the "Authorizations") such that PrimeLink has been merged into FirstLight (the "*Pro Forma* Realignment"). FirstLight and PrimeLink are collectively referred to as the "Parties." Since PrimeLink was an indirect, wholly owned subsidiary of FirstLight, the realignment was entirely *pro forma* in nature.

In addition, FirstLight notifies the Commission of *pro forma* transfer of control resulting from a change occurring in entities in the ownership chain with indirect control of FirstLight that occurred more than 30 days ago. On September 14, 2021, a publicly traded entity was inserted above Antin Infrastructure Partners S.A.S. ("Antin France") and Antin Infrastructure Partners UK Limited ("Antin UK"), the entities that jointly exercise control of FirstLight through governance, management and advisory agreements (as detailed in Attachment 1), resulting in a *pro forma* transfer of control (the "*Pro Forma* Transfer"). Specifically, Antin Infrastructure Partners SA ("AIP"), an entity formed in France, is publicly traded on the Euronext Paris exchange under the symbol ANTIN. Except for Mark Crosbie and Alain Rauscher, both of whom previously held interests in Antin France and Antin UK and retain votes as members of the Antin Investment Committee (defined in Attachment 1), no person or entity holds a 10% or greater interest in AIP. As such, this change in the indirect ownership chain was also entirely *pro forma* in nature.

Information Required by Section 63.24(f)(2)

As required by Section 63.24(f)(2), the Parties provide the following information required by 63.18(a) through (d) and (h):

Sections 63.18(a): Name, address and telephone number of the Parties:

PrimeLink, Inc.
FirstLight Fiber, Inc.
41 State Street, 10th Floor
Albany, NY 12207
518-598-0900

Sections 63.18(b): Organization of the Parties:

PrimeLink, Inc. was a New York corporation.

FirstLight Fiber, Inc. is a Delaware corporation.

Section 63.18(c): Correspondence concerning this filing should be sent to the Parties' counsel:

Catherine Wang
Danielle Burt
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave, N.W.
Washington, DC 20004
202-739-3000 (Tel)
202-739-3001 (Fax)
catherine.wang@morganlewis.com
danielle.burt@morganlewis.com

Section 63.18(d): The Parties hold or held the following Authorizations:

PrimeLink, Inc. held international Section 214 authority to provide global or limited global facilities-based and global resale services granted in IB File Nos. ITC-214-19970324-00166 and ITC-214-19990924-00588.

FirstLight Fiber holds international Section 214 authority to provide global or limited global facilities-based and resale services granted in IB File Nos. ITC-214-19990825-00538 and ITC-214-20010209-00086.

Sections 63.18(h): See **Attachment 1** for the ownership of the Parties. See **Attachment 2** for pre- and post-*Pro Forma* Realignment corporate structure of the Parties.

The Parties certify that the *Pro Forma* Realignment and the *Pro Forma* Transfer were *pro forma* and that, together with all previous *pro forma* transactions, did not result in a change in the actual controlling party of the Parties or their Authorizations.

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This notification letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Danielle Burt

Catherine Wang
Danielle Burt

Counsel for the Parties

ATTACHMENT 1

Answer to Question 11 - Section 63.18(h) Ownership Information

The following entities currently hold, directly or indirectly, a 10% or greater interest in FirstLight Fiber, Inc. ("FirstLight"), as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

FirstLight Holdco, Inc. ("Holdco")

Address:	1114 Avenue of the Americas New York, New York 10036
Place of Organization:	Delaware
Principal Business:	Holding Company
Attributed Interest Held:	100% (directly, as 100% owner of FirstLight)

Flight Intermediate Holdco Inc. ("FIH")

Address:	1114 Avenue of the Americas New York, New York 10036
Place of Organization:	Delaware
Principal Business:	Holding Company
Attributed Interest Held:	100% (indirectly, as 100% owner of Holdco)

Flight Holdco Inc. ("Flight Holdco")

Address:	1114 Avenue of the Americas New York, New York 10036
Place of Organization:	Delaware
Principal Business:	Holding Company
Attributed Interest Held:	100% (indirectly, as 100% owner of FIH)

Flight Group Holdings LP ("Flight Group Holdings")

Address:	1114 Avenue of the Americas New York, New York 10036
Place of Organization:	Delaware
Principal Business:	Holding Company
Attributed Interest Held:	100% (indirectly, as 100% owner of Flight Holdco)

Flight Group Holdings GP LLC ("Flight Group LLC")

Address:	1114 Avenue of the Americas New York, New York 10036
Place of Organization:	Delaware
Principal Business:	Holding Company
Attributed Interest Held:	100% (indirectly, as the general partner (0% equity) of Flight Group Holdings)

As described below, Antin III France and Antin III UK respectively hold 57.51% and 42.49% of the membership interests in Flight Group LLC but Antin III France and Antin III UK jointly hold 100% voting interest in Flight Group LLC.[1]

Antin Infrastructure Partners III-B SCSp ("Antin III-B")

Address:	37a Avenue JF Kennedy Luxembourg, Grand Duchy of Luxembourg, L-1855
Place of Organization:	Luxembourg
Principal Business:	Investments
Attributed Interest Held:	21.14% (indirectly holding 21.14% limited partnership interest in Flight Group Holdings)

No limited partner of Antin III-B is attributed a 10% or greater interest in Flight Group Holdings. The General Partner of Antin III_B is Antin Infrastructure Partners Luxembourg GP S.a.r.l.

Flight Co-Invest LP ("Flight Co-Invest")

Address:	14 St. George Street W1S 1FE London, United Kingdom
Place of Organization:	United Kingdom
Principal Business:	Investments
Attributed Interest Held:	23.55% (indirectly, holding a 23.55% limited partnership interest in Flight Group Holdings)

No limited partner of Flight Co-Invest is attributed a 10% or greater interest in Flight Group Holdings. The General Partner of Flight Co-Invest is Antin Infrastructure Partners Luxembourg GP S.a.r.l.

Antin Infrastructure Partners III, FPCI ("Antin III France")

Address:	374 Rue Saint Honoré 75001 Paris, France
Place of Organization:	France
Principal Business:	Investments
Attributed Interest Held:	100% (indirectly, (i) holding a 30.85% limited partnership interest in Flight Group Holdings; and (ii) holding a 57.51% membership interest in Flight Group LLC and jointly with Antin III UK holding a 100% voting interest in Flight Group LLC[2]).

No limited partner of Antin III France is attributed a 10% or greater interest in Flight Group Holdings. The General Partner of Antin III France is Antin Infrastructure Partners S.A.S.

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[1] The voting rights of Antin III France and Antin III UK in Flight Group LLC result from the following facts: (i) the business and affairs of Flight Group LLC are managed by a board of managers (the "Flight Group Board"), which consists of two managers; (ii) decisions of the Flight Group Board are made with the consent of a majority of the members (i.e., unanimous consent); and (iii) members of the Flight Group Board may be appointed with the unanimous consent of the members of Flight Group LLC, which appointments therefore require the consent of both Antin III France and Antin III UK.

[2] *See supra* note 1.

Antin Infrastructure Partners III, L.P. ("Antin III UK")

Address:	14 St. George Street W1S 1FE London, United Kingdom
Place of Organization:	United Kingdom
Principal Business:	Investments
Attributed Interest Held:	100% (indirectly, (i) holding a 22.80% limited partnership interest in Flight Group Holdings; and (ii) holding a 42.49% membership interest in Flight Group LLC and jointly with Antin III UK holding a 100% voting interest in Flight Group LLC[3]).

No limited partner of Antin III UK is attributed a 10% or greater interest in Flight Group Holdings. The General Partner of Antin III UK is Antin Infrastructure Partners Luxembourg GP S.a.r.l.

Control of Antin III-B, Flight Co-Invest, Antin III UK and Antin III France is vested in the following entities. Also, as described below, Antin Infrastructure Partners UK Limited ("Antin UK") and Antin Infrastructure Partners S.A.S. ("Antin France") jointly exercise control over Antin III UK and Antin III France ("Antin III") and therefore indirectly jointly control FirstLight through governance, management and advisory agreements. Antin UK and Antin France are each 100% owned by AIP.

Antin Infrastructure Partners III Luxembourg GP, S.a.r.l. ("Antin Luxembourg GP")

Address:	37a Avenue JF Kennedy Luxembourg, Grand Duchy of Luxembourg, L-1855
Place of Organization:	Luxembourg
Principal Business:	Fund Management
Attributed Interest Held:	100% (indirectly, (i) as general partner (1 general partner share[4]) of Antin III UK; (ii) as general partner (1 general partner share[5]) of Flight Co-Invest; and (iii) as general partner (1 general partner share[6]) of Antin III-B)

[3] *See supra* note 1.

[4] This general partner share only ensures the payment of an annual fixed fee incurred for its General Partner services. This share does not entitle Antin Luxembourg GP to any dividend rights or other equity rights and Antin Luxembourg GP should therefore be regarded as holding a 0% equity interest in Antin III UK.

[5] This general partner share only ensures the payment of an annual fixed fee incurred for its General Partner services. This share does not entitle Antin Luxembourg GP to any dividend rights or other equity rights and Antin Luxembourg GP should therefore be regarded as holding a 0% equity interest in Flight Co-Invest.

[6] This general partner share only ensures the payment of an annual fixed fee incurred for its General Partner services. This share does not entitle Antin Luxembourg GP to any dividend rights or other equity rights and Antin Luxembourg GP should therefore be regarded as holding a 0% equity interest in Antin III-B.

Antin Infrastructure Partners UK Limited ("Antin UK")

Address:	14 St. George St. London W1S 1FE, United Kingdom
Place of Organization:	United Kingdom
Principal Business:	Fund Management
Interest Held:	100% (indirectly, (i) as 100% owner of Antin Luxembourg GP; (ii) holding a controlling interest in Antin III as authorized manager of Antin III UK, which control is exercised pursuant to governance, management and advisory agreements; and (iii) holding a controlling interest in Flight Co-Invest as authorized manager of Flight Co-Invest, which control is exercised pursuant to governance, management and advisory agreements)

Antin Infrastructure Partners S.A.S. ("Antin France")

Address:	374 Rue Saint Honoré 75001 Paris, France
Place of Organization:	France
Principal Business:	Fund Management
Attributed Interest Held:	100% (indirectly, (i) as the general partner of Antin III France; (ii) holding a controlling interest in Antin III as general partner of Antin III France, which control is exercised pursuant to governance, management and advisory agreements; and (iii) holding a controlling interest in Antin III-B as authorized manager of Antin III-B, which control is exercised pursuant to governance, management and advisory agreements)

Antin Infrastructure Partners SA ("AIP")

Address:	374 Rue Saint Honoré 75001 Paris, France
Place of Organization:	France
Principal Business:	Fund Management
Attributed Interest Held:	100% (indirectly, as 100% owner of Antin France and Antin UK)

AIP is publicly traded on the Euronext Paris exchange under the symbol ANTIN. Except for Mark Crosbie and Alain Rauscher, no person or entity holds a 10% or greater interest in AIP.

As indicated above, Antin UK and Antin France jointly exercise control over Antin III and therefore indirectly jointly control FirstLight through governance, management and advisory agreements. Pursuant to such agreements, all investments decisions in relation to Antin III (including with respect to Flight Group Holdings and its subsidiaries) are made by Antin UK and Antin France's respective investment committees (together the "Antin Investment Committee"), which are both composed of the same eight (8) individual members and must act in concert with respect to matters for both Antin UK and

Antin France.[7] All the Antin Investment Committee's decisions are made by majority vote, with the vote of each Antin Investment Committee member having equal weight, which majority vote must also have the vote of two founding members, Mark Crosbie and Alain Rauscher. Mr. Crosbie, a British citizen, has a 17.80% interest in Antin France (through AIP) and a 27.60% interest in Antin UK (through AIP). His address is c/o Antin Infrastructure Partners UK Limited, 14 St. George St., London W1S 1FE, United Kingdom. Mr. Rauscher, a French citizen, has a 30.90% interest in Antin France (through AIP) and a 45.16% interest in Antin UK (through AIP). His address is c/o Antin Infrastructure Partners S.A.S., 374 Rue Saint Honoré, 75001 Paris, France. The indirect ownership interests in FirstLight of Mssrs. Crosbie and Rauscher are already a matter of record at the FCC.

No other individual or entity has the ability to exercise affirmative or negative control over Antin III or, indirectly, FirstLight.

Answer to Question 12 - Section 63.18(h) Interlocking Directorates

FirstLight does not have interlocking directorates with any foreign carrier. FirstLight is a non-dominant foreign carrier in Canada, holding a license to provide Basic International Telecommunications Services and a registration as a reseller of telecommunications services. FirstLight is also affiliated with the following foreign carriers:

- Eurofiber Nederland is an independent and non-dominant provider of fixed telecommunications services to enterprise customers in the Netherlands.
- Eurofiber N.V. is an independent and non-dominant provider of fixed telecommunications services to enterprise customers in Belgium.
- Cityfibre is an independent and non-dominant provider of fixed telecommunications services to enterprise customers in the United Kingdom.

[7] The Antin Investment Committee consists of the following individuals: Mélanie Biessy, a French citizen; Mark Crosbie, a British citizen; Stéphane Ifker, a French citizen; Sébastien Lecaudey, a French citizen; Alain Rauscher, a French citizen; Angelika Schöchlin, a German citizen; Kevin Scott Genieser, a U.S. citizen; and Francisco Abularach, a U.S. citizen.

- Lyntia is an independent and non-dominant provider of fixed telecommunications services to enterprise customers in Spain.

Answer to Question 13 - Description of Transfer of Control

Prior to June 30, 2022, PrimeLink, Inc. was a subsidiary of FirstLight. As a result of an intra-company merger completed on June 30, 2022 as part of the *Pro Forma* Realignment, FirstLight survived the merger and the separate existence of PrimeLink, Inc. ceased. Charts depicting the corporate organizational structure of the FirstLight before and after the *Pro Forma* Realignment are attached hereto as **Attachment 2**.

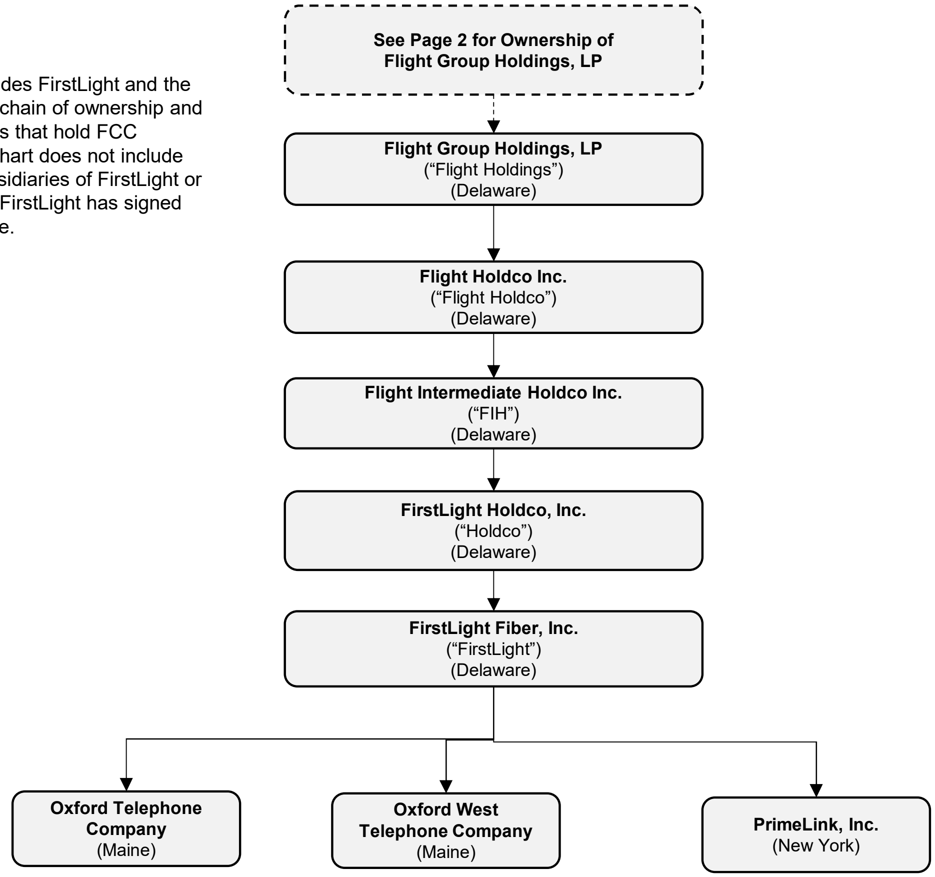
In addition, on September 14, 2021, a publicly traded entity was inserted above Antin Infrastructure Partners S.A.S. ("Antin France") and Antin Infrastructure Partners UK Limited ("Antin UK"), the entities that jointly exercise control of FirstLight through governance, management and advisory agreements, resulting in the *Pro Forma* Transfer. Specifically, Antin Infrastructure Partners SA ("AIP"), an entity formed in France and publicly traded on the Euronext Paris exchange under the symbol ANTIN, was added to the corporate structure of Antin France and Antin UK. No person or entity holds a 10% or greater interest in AIP except for Mark Crosbie and Alain Rauscher, both of whom previously held interests in Antin France and Antin UK and retain votes as members of the Antin Investment Committee.

<u>ATTACHMENT 2</u>

Pre- and Post-*Pro Forma* Realignment Corporate Ownership Structure Charts

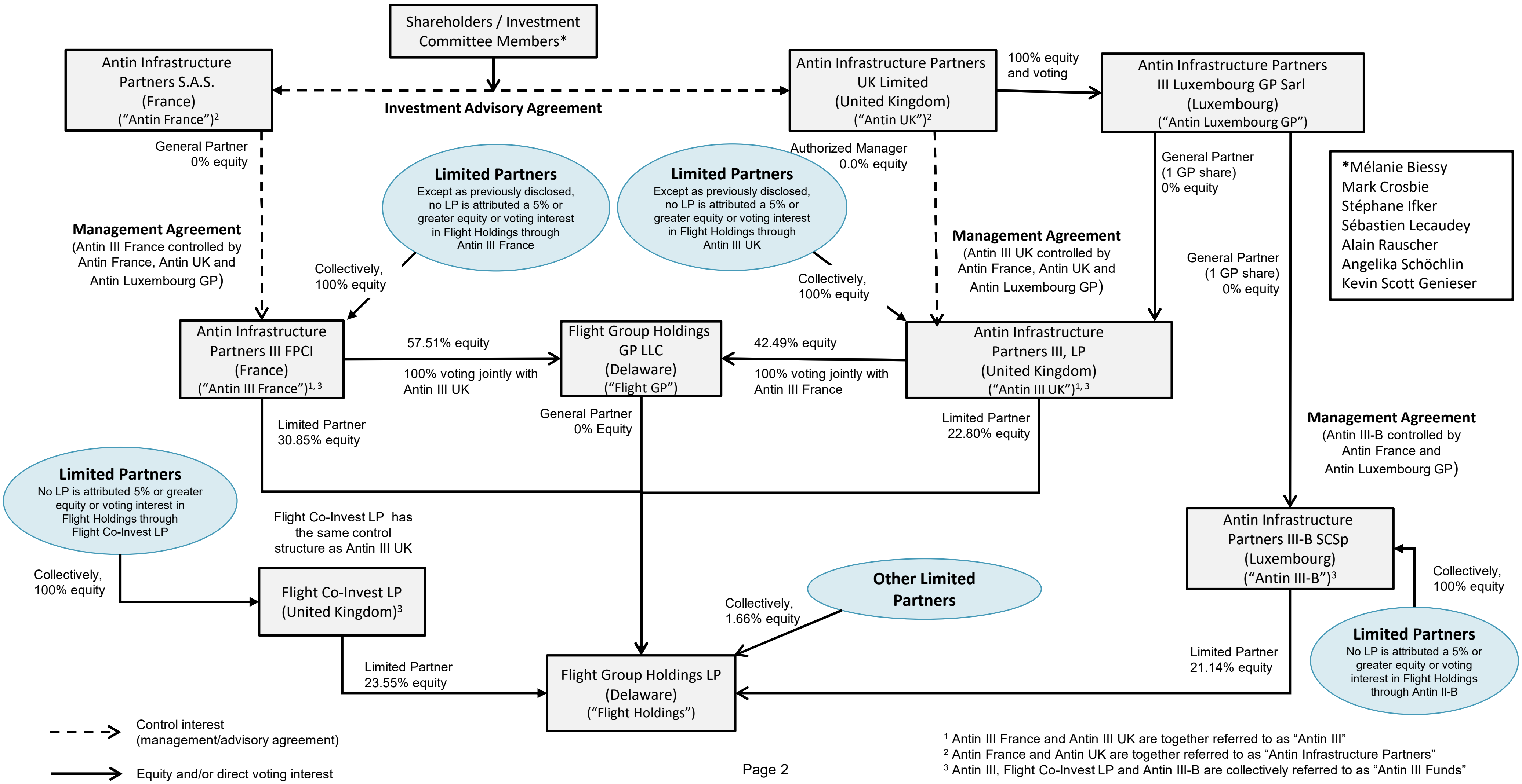
Pre-Transaction Ownership Structure of FirstLight

* This chart only includes FirstLight and the entities that are in its chain of ownership and its current subsidiaries that hold FCC authorizations. This chart does not include (a) other existing subsidiaries of FirstLight or (b) other entities that FirstLight has signed agreements to acquire.



All ownership percentages are 100%.

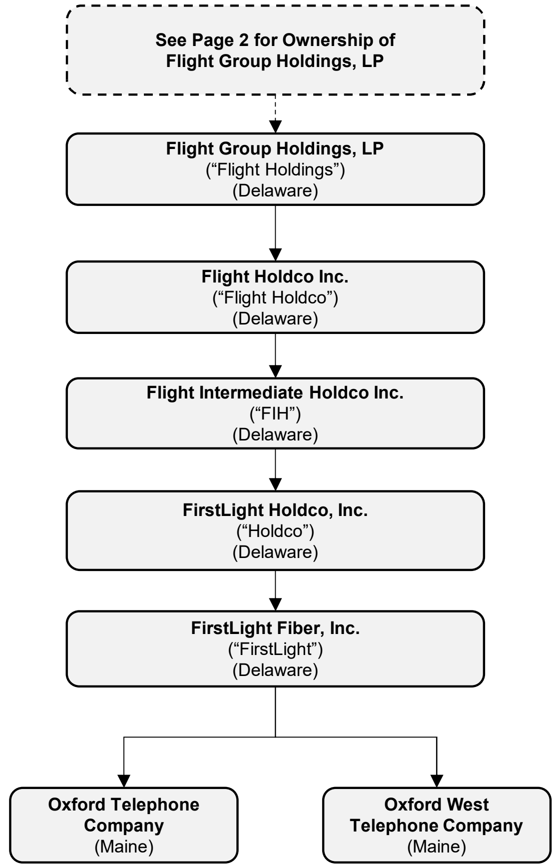
Pre-Transaction Ownership Structure of Flight Group Holdings LP



[1] Antin III France and Antin III UK are together referred to as "Antin III"
[2] Antin France and Antin UK are together referred to as "Antin Infrastructure Partners"
[3] Antin III, Flight Co-Invest LP and Antin III-B are collectively referred to as "Antin III Funds"

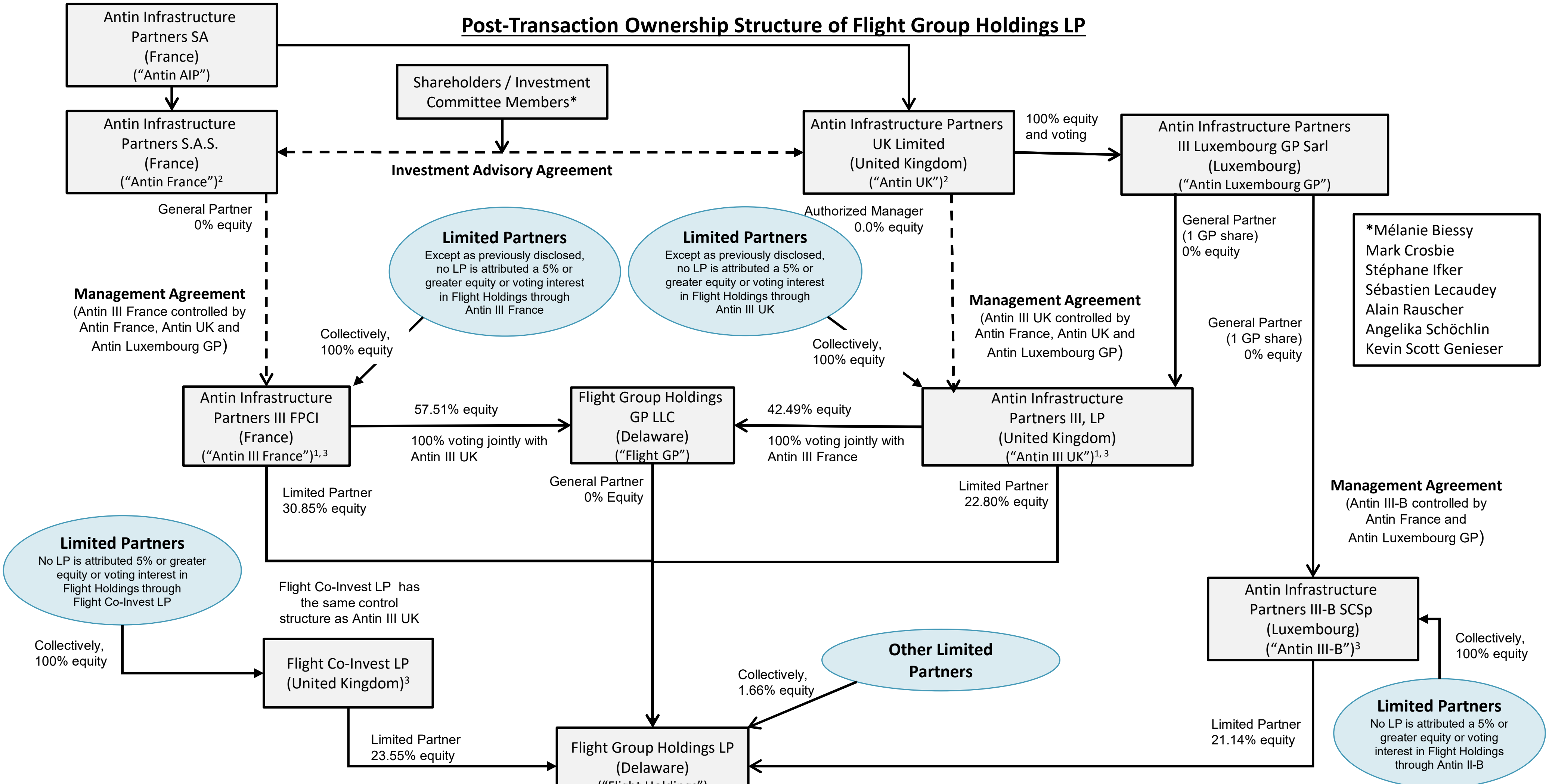
Post-Transaction Ownership Structure of FirstLight

* This chart only includes FirstLight and the entities that are in its chain of ownership and its current subsidiaries that hold FCC authorizations. This chart does not include (a) other existing subsidiaries of FirstLight or (b) other entities that FirstLight has signed agreements to acquire.



All ownership percentages are 100%.

Post-Transaction Ownership Structure of Flight Group Holdings LP



Control interest (management/advisory agreement)

Equity and/or direct voting interest

[1] Antin III France and Antin III UK are together referred to as "Antin III"
[2] Antin France and Antin UK are together referred to as "Antin Infrastructure Partners"
[3] Antin III, Flight Co-Invest LP and Antin III-B are collectively referred to as "Antin III Funds"

VERIFICATION

I, Jill Sandford, hereby declare that I am Chief Legal Officer of FirstLight Fiber, Inc. and its subsidiaries (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 with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of July, 2022.

Jill Sandford

Jill Sandford
Chief Legal Officer
FirstLight Fiber, Inc.