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July 30, 2026

Via ICFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554
Attn: Office of International Affairs

Re: ITC-ASG-20260730-00226
Notification of FirstLight Fiber, Inc. and FirstLight Networks, LLC Regarding
a *Pro Forma* Assignment of Certain Assets and Customers from FirstLight
Fiber, Inc. to FirstLight Networks, LLC

Dear Secretary Dortch:

FirstLight Fiber, Inc. ("FLF") and its wholly owned indirect subsidiary FirstLight Networks, LLC ("FirstLight Networks") (together, the "Parties"), pursuant to 47 C.F.R. § 63.24(f), hereby notifies the Commission of a *pro forma* assignment of certain assets and customers, including communications optical fiber, certain customer contracts, rights in third party fibers, and associated telecommunications equipment used to provision services or facilities, from FLF to FirstLight Networks (the "*Pro Forma* Assignment"). The *Pro Forma* Assignment, which was completed on July 10, 2026, relates to FLF's business plan to implement an internal restructuring that organized, and obtained financing to support, certain of its operations into FirstLight Networks.

Because the *Pro Forma* Assignment involved only the assignment of certain assets and customers from FLF to a wholly owned, indirect subsidiary, the *Pro Forma* Assignment did not result in any change to the actual controlling party of the Parties, or the authorizations held by the Parties, and is therefore considered a *pro forma* transaction under the Commission's rules.

Information Required by Section 63.24(f)(2)

As required by Section 63.24(f)(2), the Parties provide the following information required by Sections 63.18(a)-(d) and (h) of the Commission's rules.

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

FirstLight Fiber, Inc.

FRN: 0006097711

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Ave., NW
Washington, DC 20004-2541
United States

T +1.202.739.3000
F +1.202.739.3001

12 Metro Park Road
Albany, NY 12205
Tel: 1-800-461-4863

FirstLight Networks, LLC
12 Metro Park Road
Albany, NY 12205
Tel: 1-800-461-4863

FRN: 0037580081

Sections 63.18(b): Organization of the Parties:

FLF is a Delaware corporation.

FirstLight Networks is a Delaware limited liability company.

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

For the Parties:

Catherine Wang
Patricia Cave
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2541
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catherine.wang@morganlewis.com
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With a copy to:

Jill Sandford
Chief Legal Officer
FirstLight Fiber, Inc.
FirstLight Networks, LLC
12 Metro Park Road
Albany, NY 12205
Tel: 518-694-8736
jsandford@firstlight.net

Section 63.18(d): Section 214 authority held by the Parties:

FLF holds the following international Section 214 authorizations:

- Global resale telecommunications services, originally granted in ICFS File No. ITC-214-19990825-00538 on September 17, 1999.¹
- Global or limited global facilities-based telecommunications services and global or limited global resale telecommunications services, originally granted in ICFS File No. ITC-214-20010209-00086 on March 14, 2001.²

¹ The authorization was originally granted under the name Tech Valley Communications, Inc. Subsequently, in ICFS File No. ITC-T/C-20020307-00149 on May 3, 2002, the Commission approved the assignment of the authorization to a newly formed company, TVC Albany, Inc. Subsequently, on April 30, 2019, the Commission was notified of the legal name change to FirstLight Fiber, Inc.

² The authorization was originally granted under the name Mid-Hudson Communications, Inc. Subsequently, in ICFS File No. ITC-T/C-20020307-00158 on May 3, 2002, the Commission approved

On July 28, 2026, and in accordance with Section 63.21(h) of the Commission's rules, FLF notified the Commission that FirstLight Networks began providing service pursuant to the above-referenced international Section 214 authorizations held by FLF.

The Parties are also each authorized to provide interstate telecommunications services by virtue of blanket domestic Section 214 authority. See 47 C.F.R. § 63.01.

Sections 63.18(h): Ownership information:

Information regarding the current ownership of the Parties, as well a description of the *Pro Forma* Assignment, are provided as **Attachment 1**. Provided as **Attachment 2** are charts depicting the current ownership of the Parties and the *Pro Forma* Assignment.

In accordance with Section 63.24(f)(2)(ii) of the Commission's rules, the Parties hereby certify that the *Pro Forma* Assignment was *pro forma* and did not result in a change to the actual controlling party of the Parties or the authorizations held by the Parties.

* * * *

This Notification is being filed electronically via ICFS. Should you have any questions concerning this Notification, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Patricia Cave
Catherine Wang
Patricia Cave

Counsel to the Parties

the assignment of the authorization to a newly formed company, TVC Albany, Inc. Subsequently, on April 30, 2019, the Commission was notified of the legal name change to FirstLight Fiber, Inc.

ATTACHMENT 1

Answer to Question 11 - Section 63.18(h)(1) Ownership Information

The following entities are attributed a ten percent (10%) or greater direct or indirect interest in the Parties, as calculated pursuant to the Commission's ownership attribution rules for international telecommunications carriers:

FirstLight Issuer, LLC ("FirstLight Issuer")

Address: 12 Metro Park Road
Albany, NY 12205
Citizenship: U.S. (Delaware)
Principal Business: Holding company
Attributed Interest Held: 100% equity and voting (directly as sole member of FirstLight Networks)

FirstLight Guarantor, LLC ("FirstLight Guarantor")

Address: 12 Metro Park Road
Albany, NY 12205
Citizenship: U.S. (Delaware)
Principal Business: Holding company
Attributed Interest Held: 100% equity and voting (indirectly as sole member of FirstLight Issuer)

FirstLight Fiber, Inc. ("FLF")

Address: 12 Metro Park Road
Albany, NY 12205
Citizenship: U.S. (Delaware)
Principal Business: Operating company
Attributed Interest Held: 100% equity and voting (indirectly as sole member of FirstLight Guarantor)

FirstLight Holdco, Inc. ("FL Holdco")

Address: 12 Metro Park Road
Albany, NY 12205
Citizenship: U.S. (Delaware)
Principal Business: Holding company
Attributed Interest Held: 100% equity and voting (indirectly as sole member of FLF)

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% equity and voting (indirectly, as 100% owner of FL 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% equity and voting (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% equity and voting (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: 0% equity and 100% voting (indirectly, as 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% of the voting interests 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: 21.08% equity and deemed voting (indirectly, through a 21.08% 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.

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.

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: 23.48% equity and deemed voting (indirectly, through a
23.48% 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: 30.76% equity and 100% voting (indirectly, through (i) a
30.76% limited partnership interest in Flight Group Holdings;
(ii) a 57.51% membership interest in Flight Group LLC; and
(iii) jointly with Antin III UK holding a 100% voting interest in
Flight Group LLC²)

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.

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: 22.73% equity and 100% voting (indirectly, through (i) a
22.73% limited partnership interest in Flight Group Holdings;
(ii) a 42.49% membership interest in Flight Group LLC; and
(iii) jointly with Antin III France holding a 100% voting
interest in Flight Group LLC³)

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

² See *supra* note 1.

³ See *supra* note 1.

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: 0% equity and 100% voting (indirectly, as (i) general partner (with 1 general partner share⁴) of Antin III UK; (ii) general partner (with 1 general partner share⁵) of Flight Co-Invest; and (iii) general partner (with 1 general partner share⁶) of 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: 0% equity and 100% voting (indirectly, as (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

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.

Attributed Interest Held: 0% equity and 100% voting (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: 0% equity and 100% voting (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. Alain Rauscher, as Chairman of the Investment Committee, has a casting vote in the event of a deadlock. Mr. Mark 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.

⁷ The Antin Investment Committee consists of the following individuals: Mélanie Biessy, a French citizen; Stéphane Ifker, a French citizen; Sébastien Lecaudey, a French citizen; Alain Rauscher, a French citizen; Angelika Schöchlin, a German citizen; Guillaume Friedel, a French citizen; Ryan Shockley, a U.S. citizen; and Simon Soder, a Swedish citizen.

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, the Parties.

Answer to Question 12 - Section 63.18(h)(3) Interlocking Directorates

The Parties do not have interlocking directorates with any foreign carrier. FLF 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 Networks is also 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

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

Answer to Question 13 - Description of the *Pro Forma* Assignment

The *Pro Forma* Assignment was part of FLF's plan to execute an internal restructuring which organized its network and operations being assigned for FirstLight Networks. The plan also involved obtaining financing to support that network and operations and for other general corporate purposes.

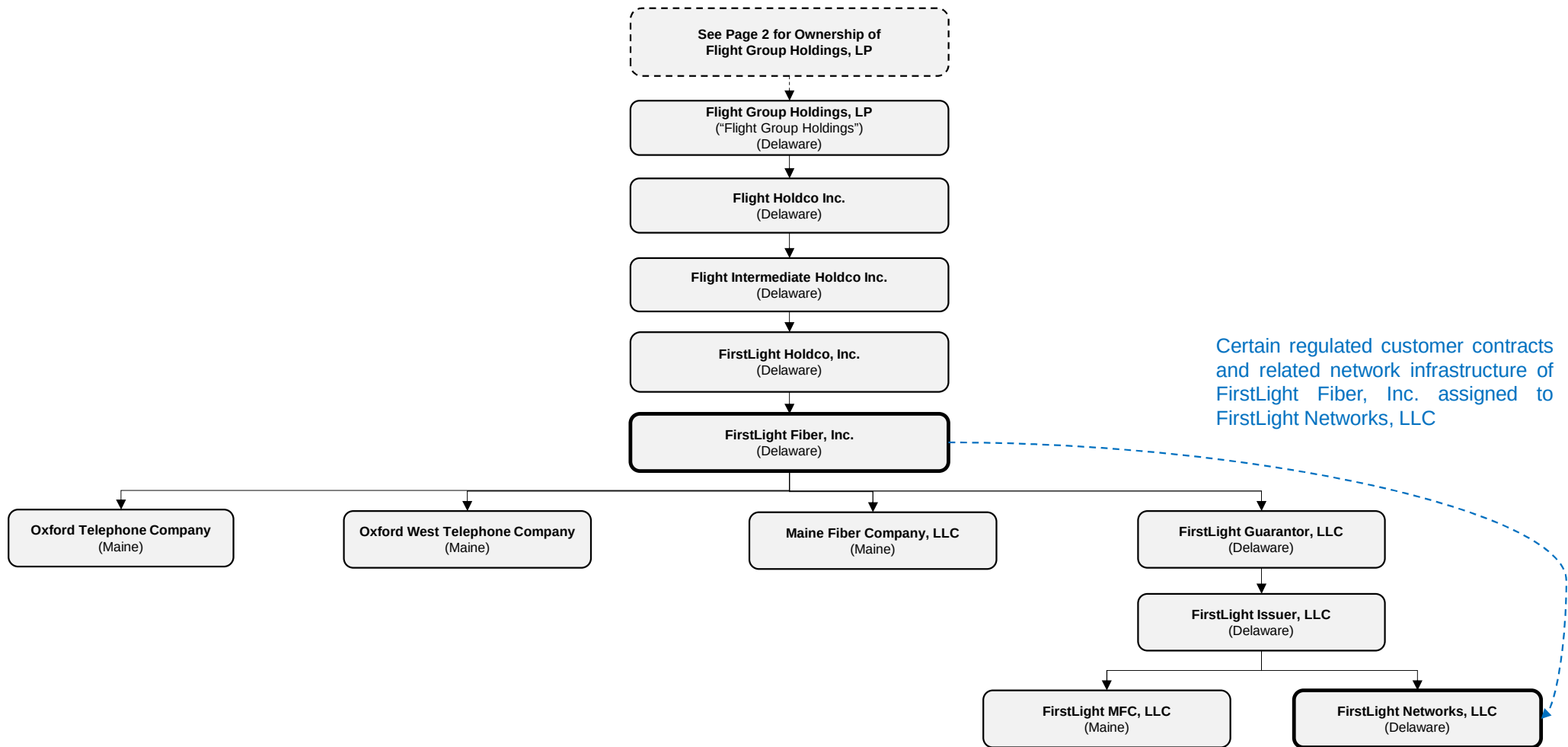
FLF implemented this plan by assigning to FirstLight Networks certain assets in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, and Vermont, including communications optical fiber, certain customer contracts, rights in third party fibers, and associated telecommunications equipment used to provision services or facilities to the affected customers. FLF may continue to provide telecommunications services to other existing and new customers that are not a part of this internal restructuring plan and therefore has retained its international Section 214 authorizations.

To ensure seamless and uninterrupted service, all customers assigned to FirstLight Networks continue to receive service from FirstLight Networks under the same rates, terms and conditions of service as with FLF. Future changes in the rates, terms and conditions of service to the affected customers will be undertaken in the ordinary course of business pursuant to customer contracts and the applicable federal and state requirements. The *Pro Forma* Assignment did not disadvantage customers or cause confusion or disruption to customers since the Parties market and perform their services under the "FirstLight" brand and operate through the same customer service, technical, operational and managerial personnel.

ATTACHMENT 2

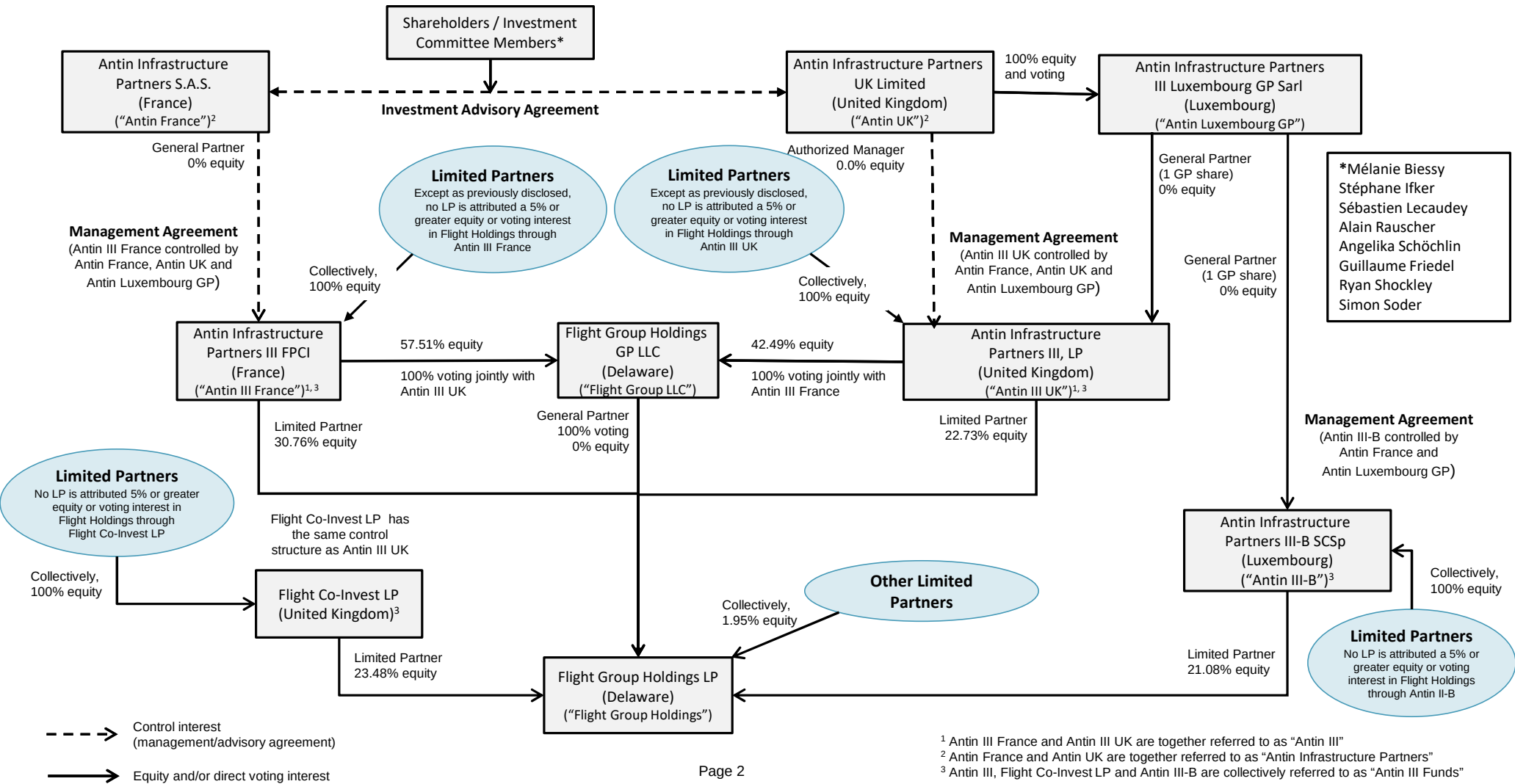
Ownership Structure Charts and Depiction of the *Pro Forma* Assignment

Current Ownership and Depiction of the *Pro Forma* Asset Transfer



All ownership percentages depicted are 100% equity and voting.

Current Ownership Structure of Flight Group Holdings LP



VERIFICATION

I, Jill Sandford, state that I am Chief Legal Officer of FirstLight Fiber, Inc. and FirstLight Networks, LLC (together, 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 therein 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 30th day of July 2026.

A handwritten signature in dark ink, reading "Jill Sandford", is positioned above a horizontal line.

Jill Sandford
Chief Legal Officer
FirstLight Fiber, Inc.
FirstLight Networks, LLC