

# Morgan Lewis

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December 11, 2019

**Via ECFS & IBFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, DC 20554

**Re: SUPPLEMENT  
WC Docket No. 19-166; ITC-T/C-20190614-00121; ITC-T/C-20190614-00122; & ITC-T/C-20190617-00123** - Joint Application of Front Range TopCo, Inc., Zayo Group Holdings, Inc., Allstream Business US, LLC, Electric Lightwave, LLC, and Zayo Group, LLC for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Transfer Indirect Control of Domestic and International Section 214 Authorization Holders to Front Range TopCo, Inc.

**SCL-T/C-20190614-00018** - Joint Application of Front Range TopCo, Inc., Zayo Group Holdings, Inc., and Zayo Group, LLC for Authority of Cable Landing License

Dear Secretary Dortch:

Front Range TopCo, Inc. ("Front Range") submits this letter to further supplement the applications filed in the above-captioned proceedings in response to a request by Commission staff regarding the Supplement filed on August 21, 2019.

EQT Infrastructure IV Co-Investment (D) SCSp was formed solely for the purposes of this Transaction and does not have a 10 percent or greater interest in any other domestic telecommunications carrier.

To the best of Front Range's knowledge, based on publicly available information, Teacher Retirement System of Texas<sup>1</sup> has a 4-13 percent or greater interest in ExteNet Systems, Inc. and its domestic telecommunications carrier subsidiaries, including ExteNet Systems (New York), Inc., ExteNet Systems (Virginia) LLC, ExteNet Systems (California) LLC, ESI Advanced Wireless Networks, LLC, Hudson Fiber Network Inc., Telecommunication Properties, Inc., and

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<sup>1</sup> The Teacher Retirement System of Texas is the largest public retirement system in Texas, serving more than 1.5 million people. No person or entity will indirectly hold a 10% or greater interest in Zayo as a result of their participation in the Teacher Retirement System of Texas.

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Wireless Venues, Inc.<sup>2</sup> To the best of Front Range's knowledge, Teacher Retirement System of Texas does not have a 10 percent or greater interest in any other domestic telecommunications carrier.

Should you have any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

*/s/ Ulises Pin*

Ulises R. Pin  
Joshua M. Bobeck

*Counsel for Front Range*

cc: Dennis Johnson, WCB

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<sup>2</sup> See Joint Application of ExteNet Systems, Inc., Tiger Infrastructure Partners Fund LP, Hudson Fiber Network Inc., WC Docket No. 18-194 (filed June 12, 2018); *Notice of Domestic Section 214 Authorizations Granted*, WC Docket Nos. 18-178, 18-187, and 18-194, DA 18-781, (rel. July 27, 2018) (approving the transfer of control of Hudson Fiber Network Inc. to ExteNet Systems, Inc.).