

Morgan Lewis

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June 10, 2020

VIA IBFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554
Attn: International Bureau

Re: Notification Regarding the *Pro Forma* Transfer of Control of Uniti Fiber LLC and Hunt Telecommunications, LLC

Dear Secretary Dortch:

Uniti Fiber LLC ("Uniti Fiber") and Hunt Telecommunications, LLC ("Hunt") (together, the "Licensees") and Uniti Group LP (together with the Licensees, the "Parties"), pursuant to 47 C.F.R. § 63.24(f), notify the Commission of a *pro forma* change completed on June 2, 2020 that resulted in a change in Licensees' intermediate ownership and control structure, with no change to its ultimate owner (the "*2020 Pro Forma Change*"). Since the ultimate control and ownership of Licensees did not change, the *2020 Pro Forma Change* was *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:

Uniti Group LP
10802 Executive Center Drive, Suite 300
Little Rock, AR
501-850-0820

Morgan, Lewis & Bockius LLP

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

T +1.202.739.3000
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Uniti Fiber LLC
Hunt Telecommunications, LLC
107 St. Francis Street, Suite 1800
Mobile, AL 36602
727-471-5600

Sections 63.18(b): Organization of the Parties:

Uniti Group LP is a Delaware limited partnership.

Uniti Fiber is a Delaware limited liability company.

Hunt is a Louisiana limited liability company.

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

Ronald W. Del Sesto, Jr.
Brett P. Ferenchak
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Section 63.18(d): The Licensees holds the following international Section 214 authorizations:

Uniti Fiber holds international Section 214 authority to provide global and limited global resale and facilities-based services granted in IB File No. ITC-214-20160509-00152.

Hunt holds international Section 214 authority to global or limited global facilities-based or resale basis granted in ITC-214-20140114-00010.

Uniti Fiber and Hunt also are authorized to provide interstate service by virtue of blanket domestic Section 214 authority. See 47 C.F.R. § 63.01.

Sections 63.18(h): See **Attachment 1** for the current ownership of Uniti Fiber and Hunt. See **Attachment 2** for the pre-2020 *Pro Forma Change* and current corporate ownership structure of the Parties.

The Parties certify that the *2020 Pro Forma Change* was *pro forma*, and did not result in a change in the actual controlling party of the Licensees, which remains Uniti Fiber LP and ultimately Uniti Group Inc. ("Parent"), or the authorizations held by the Licensees.

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

Respectfully submitted,

/s/ Brett P. Ferenchak

Ronald W. Del Sesto, Jr.
Brett P. Ferenchak
Stephany Fan

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 interest¹ in Uniti Fiber LLC and Hunt Telecommunications, LLC, as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

Name:	Uniti Fiber Holdings Inc. ("Fiber Holdings")
Address:	10802 Executive Center Drive Benton Building, Suite 300 Little Rock, Arkansas 72211
Interest:	100% (directly in Licensees)
Citizenship:	Delaware
Principal Business:	Holding Company
Name:	Uniti Group Finance Inc. ("Uniti Group Finance")
Address:	10802 Executive Center Drive Benton Building, Suite 300 Little Rock, Arkansas 72211
Interest:	49% (indirectly, as 49% direct owner of Fiber Holdings)
Citizenship:	Delaware
Principal Business:	Holding Company
Name:	CSL Capital, LLC
Address:	10802 Executive Center Drive Benton Building, Suite 300 Little Rock, Arkansas 72211
Interest:	49% (indirectly, as approximately 99% direct owner of Uniti Group Finance)
Citizenship:	Delaware
Principal Business:	Holding Company
Name:	Uniti Group LP
Address:	10802 Executive Center Drive Benton Building, Suite 300 Little Rock, Arkansas 72211
Ownership:	Approx. 100% (indirectly, as 51% direct owner of Fiber Holdings, and 100% direct owner of CSL Capital, LLC)
Citizenship:	Delaware
Principal Business:	Holding Company

¹ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Name: Uniti Group Inc.
Address: 10802 Executive Center Drive
Benton Building, Suite 300
Little Rock, Arkansas 72211
Ownership: Approx. 100% (indirectly, as 98% General Partner of Uniti Group LP and sole member of Uniti Group LP LLC, which is a less than 1% limited partner of Uniti Group LP)
Citizenship: Maryland
Principal Business: Holding Company

Uniti Group Inc. is a widely held publicly traded company (NASDAQ: UNIT) whose ownership constantly changes. Therefore, the ownership information provided below is based on publicly filed documents including SEC Forms 13G. To its knowledge, therefore, there is one entity that may be attributed a 10% or greater ownership interest in Uniti Group: BlackRock, Inc. According to the documents reviewed by Uniti, BlackRock, Inc.'s ownership in Uniti Group is through multiple subsidiaries none of which individually is attributed a 10% or greater ownership interest.

To the Parties' knowledge, no other person or entity, directly or indirectly, owns or controls a ten percent (10%) or greater interest in the Parties.

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

Neither of the Licensees have any interlocking directorates with a foreign carrier. The Parties certify that they are not foreign carriers or affiliated (as defined in 47 C.F.R. § 63.09) with any foreign carriers.

Answer to Question 13 - Description of the 2020 Pro Forma Change

Through a series of intracorporate transactions, the *2020 Pro Forma* Change involved the removal of two intermediate companies (*i.e.*, CSL National, LP² and CSL National GP, LLC³) from

² CSL National, LP is a Delaware limited partnership.

³ CSL National GP, LLC is a Delaware limited liability company.

Licensees' ownership and control chain. Upon completion of the *2020 Pro Forma Change*, Uniti Group LP through CSL Capital, LLC and Uniti Group Finance Holdco Inc. owns Fiber Holdings and thus Licensees. Since Licensees remain direct, wholly owned subsidiaries of Fiber Holdings and nearly wholly owned, indirect subsidiaries of Uniti Group LP and Parent, the *2020 Pro Forma Change* was *pro forma* in nature.

Charts depicting the pre-*2020 Pro Forma Change* and current ownership structure of the Parties are attached as **Attachment 2**.

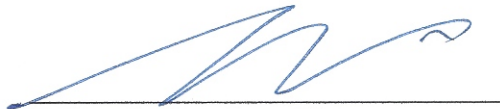
ATTACHMENT 2

Pre-2020 Pro Forma Change and Current Corporate Ownership Structure Charts

VERIFICATION

I, Jeffrey R. Strenkowski, hereby declare that I am the Vice President and Deputy General Counsel of Governmental Affairs of Uniti Group Inc. (“Uniti Group”); that I am authorized to make this Verification on behalf of Uniti Group and its subsidiaries (collectively, 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 10th day of June, 2020.



Jeffrey R. Strenkowski
Vice President, Deputy General Counsel of
Government Affairs
Uniti Group Inc.