

February 4, 2021

VIA IBFS AND ECFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, DC 20554

**Re: WC Docket No. 21-25; IB File No. ITC-T/C-20210125-00025
Joint Application of Wyverd Group Holdings, LLC, Transferee, ESU Zona LLC,
Transferor, and Accipiter Communications, Inc. d/b/a Zona Communications,
Section 214 Holder For Grant of Authority Pursuant to Section 214 of the
Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the
Commission’s Rules to Transfer Indirect Control of Section 214 Holder, a Holder
of Domestic and International Section 214 Authorizations to Transferee.**

Dear Ms. Dortch:

Wyverd Group Holdings, LLC (“Transferee”) submits this letter to clarify information in connection with the above-referenced Joint Application. Specifically, Transferee provides additional information about domestic telecommunications providers in which entities that own or control a 10% or greater direct or indirect interest in Transferee also own or control a 10% or greater direct or indirect interest. The following information is provided to the best of Transferee’s knowledge based on publicly available information.

Syniverse Technologies, LLC

Syniverse Technologies, LLC is a Delaware limited liability company whose principal business is the provision of technology and communications services. Syniverse Technologies, LLC holds international section 214 authorization (File No. ITC-214-20050420-00154). Syniverse Technologies, LLC does not provide domestic telecommunications services.

Zayo Group, LLC and its subsidiaries

Zayo Group, LLC is a Delaware limited liability company. Zayo Group, LLC holds blanket domestic section 214 authority to provide interstate telecommunications services and holds international section 214 authorization to provide facilities-based or resold international services (File No. ITC-214-20091106-00475). Zayo Group, LLC is authorized to provide competitive local exchange, competitive access and/or interexchange services in the District of Columbia and every state except Alaska. The primary telecommunications service offerings of Zayo Group, LLC include high capacity

bandwidth services such as private line, Ethernet, and wavelength services. Zayo Group, LLC does not provide voice services.

Allstream Business US, LLC is an Oregon limited liability company. Allstream Business US, LLC is a holding company that does not itself provide telecommunications services. Allstream Business US, LLC holds international section 214 authority to provide public switched and resold international services (File No. ITC-214-19970820-00500).

Electric Lightwave, LLC is a Delaware limited liability company, and is a direct subsidiary of Allstream Business US, LLC. Electric Lightwave, LLC holds blanket domestic section 214 authority to provide interstate telecommunications services, and holds international section 214 authority to provide public switched and resold international services (File Nos. ITC-214-19940415-00137, ITC-214-19980619-00425, ITC-214-20051011-00431, & ITC-214-19990729-00490). Electric Lightwave, LLC provides business and carrier customers a suite of integrated telecommunications products and services (including competitive local exchange, interexchange data, Internet access and broadband transport services) primarily in metropolitan areas in Arizona, California, Colorado, Idaho, Minnesota, Montana, Nevada, North Dakota, Oregon, Utah and Washington. Electric Lightwave, LLC is also authorized to provide intrastate interexchange services in numerous states.

Great Plains Communications, Inc. and its subsidiaries

Great Plains Communications, Inc. is a Delaware limited liability company. Great Plains Communications, Inc. holds blanket domestic section 214 authority to provide interstate telecommunications services. Great Plains Communications, Inc. serves as an incumbent local exchange carrier in Nebraska (Study Area Code 371577) and in a few areas in Colorado, Kansas, and South Dakota. Great Plains Communications, Inc. provides residential services including high-speed Internet, cable television, and local and long distance telephone services as well as business and enterprise services ranging from voice and data products to installation and support of large networks with scalable Ethernet solutions.

Great Plains Broadband, Inc. is a Delaware corporation. Great Plains Broadband, Inc. holds blanket domestic section 214 authority to provide interstate telecommunications services. Great Plains Broadband, Inc. provides facilities-based competitive local exchange services in Nebraska. It provides residential services including high-speed Internet, cable television, and local and long distance telephone services as well as business and enterprise services ranging from voice and data products to installation and support of large networks with scalable Ethernet solutions

Great Plains Communications Long Distance, Inc. is a Delaware corporation. Great Plains Communications Long Distance, Inc. holds blanket domestic section 214 authority to provide interstate telecommunications services, and holds a section 214 authorization to provide resold international telecommunications services (File No. ITC-214-20010810-00409). Great Plans Long Distance, Inc. provides competitive resold long distance services in Nebraska.

InterCarrier Network, LLC is a Michigan limited liability company. It was acquired by Great Plains Communications, LLC in 2018. *See* WC Docket No. 19-141.¹ InterCarrier Networks, LLC holds blanket domestic section 214 authority to provide interstate telecommunications services. InterCarrier Networks, LLC provides IP enabled services, broadband services, and advanced services. InterCarrier Networks, LLC also provides local exchange and exchange access services in the states of Illinois and Indiana. InterCarrier Networks, LLC is authorized to provide competitive local exchange and exchange access services in Illinois, Indiana, and Kentucky. InterCarrier Networks, LLC currently provides intra- and interexchange private line and advanced services primarily to wholesale customers in Illinois and Indiana. InterCarrier Networks, LLC does not provide local switched services in any state and does not yet provide any services in Kentucky.

Miles Communications LLC is an Indiana limited liability company. It was acquired by Great Plains Communications, LLC in 2020. *See* WC Docket No. 20-193.² Miles Communications LLC holds blanket domestic section 214 authorization. Miles Communications LLC also holds a 700 MHz wireless license with call sign WQIZ580. Miles Communications LLC provides facilities-based competitive local exchange services in southeast Indiana. It provides residential services including high-speed Internet, cable television, and local and long distance telephone services as well as business and enterprise services ranging from voice and data products to installation and support of large networks with scalable Ethernet solutions.

Sunman Telecommunications LLC is an Indiana limited liability company. It was acquired by Great Plains Communications, LLC in 2020. *See* WC Docket No. 20-193.³ Sunman Telecommunications LLC holds blanket domestic section 214 authorization and serves as an incumbent local exchange carrier in southeast Indiana (Study Area Code 320825). It provides residential services including high-speed Internet, cable television, and local and long distance telephone services as well as business and enterprise services ranging from voice and data products to installation and support of large networks with scalable Ethernet solutions.

Sunman Telecommunications Long Distance LLC is an Indiana limited liability company. It was acquired by Great Plains Communications, LLC in 2020. *See* WC Docket No. 20-193.⁴ Sunman Telecommunications Long Distance LLC holds blanket domestic section 214 authorization and an international section 214 authorization for global resale authority (File No. ITC-214-19980605-00382). Sunman Telecommunications Long Distance LLC provides competitive resold long-distance services in Indiana.

¹ InterCarrier Network, LLC was not identified in the Application, but was recently identified through further diligence of public records.

² Miles Communications LLC was not identified in the Application, but was recently identified through further diligence of public records.

³ Sunman Telecommunications LLC was not identified in the Application, but was recently identified through further diligence of public records.

⁴ Sunman Telecommunications Long Distance LLC was not identified in the Application, but was recently identified through further diligence of public records.

ExteNet Systems, Inc. and its subsidiaries

ExteNet Systems, Inc. is a Delaware corporation. ExteNet Systems, Inc. holds blanket domestic section 214 authority to provide interstate telecommunications services but does not hold international Section 214 authorization. ExteNet Systems, Inc. either itself or through its subsidiaries, is authorized to provide competitive telecommunications services in the District of Columbia and every state except Alaska, Iowa, Maine, Montana, North Dakota, Vermont and Wyoming. ExteNet Systems, Inc. designs, builds, owns and operates distributed networks for use by national and regional wireless service providers in key strategic markets in North America. Using distributed antenna systems (DAS), small cells, Wi-Fi and other technologies, ExteNet Systems, Inc. and its subsidiaries deploy distributed networks to enhance coverage and capacity and enable superior wireless service in both outdoor and indoor environments. Primary markets addressed by ExteNet Systems, Inc. include outdoor distributed networks in a variety of densely occupied or heavily traveled settings, and venues used for sports and entertainment events, the hospitality industry, commercial buildings, and healthcare facilities.

ExteNet Systems (New York), Inc., a subsidiary of ExteNet Systems, Inc., is a New York corporation. ExteNet Systems (New York), Inc., provides dedicated transport services in the State of New York.

ExteNet Systems (Virginia), LLC, a subsidiary of ExteNet Systems, Inc., is a Virginia limited liability company. ExteNet Systems (Virginia), LLC is an authorized competitive local exchange carrier and interexchange services provider in the Commonwealth of Virginia.

ExteNet Systems (California), LLC, a subsidiary of ExteNet Systems, Inc., is a California limited liability company. ExteNet Systems (California), LLC is authorized to provide facilities-based and resold competitive local exchange and interexchange services in the State of California.

ESI Advanced Wireless Networks, LLC, a subsidiary of ExteNet Systems, Inc., is a Delaware limited liability company. ESI Advanced Wireless Networks, LLC operates in Massachusetts as a “Data Local Exchange Company,” that is, a local exchange carrier providing data services. ESI Advanced Wireless Networks, LLC has also provided services in Rhode Island, but is not currently listed as a registered telecommunications provider in that state.

ExteNet Asset Entity, LLC, a subsidiary of ExteNet Systems, Inc., is a Delaware limited liability company. ExteNet Asset Entity, LLC holds authority to provide competitive telecommunications services in Arizona, Delaware, the District of Columbia, Florida, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Jersey, New York, North Carolina, Oklahoma, Pennsylvania, Rhode Island, Tennessee, Virginia, Washington and Wisconsin.

Hudson Fiber Network Inc. is a New Jersey corporation. Hudson Fiber Network, Inc. holds blanket domestic section 214 authority to provide interstate telecommunications services, and holds international Section 214 authorization to provide both facilities-based and resold services (File No.

ITC-214-20110412-00099). Hudson Fiber Network Inc. also provides domestic telecommunications services in California, Connecticut, the District of Columbia, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania (pending), Rhode Island, Tennessee, Texas, Utah, Washington and Wisconsin. Hudson Fiber Network Inc. is a data transport provider offering fiber networking solutions. It provides communications solutions to enterprises, principally utilizing equipment interconnected using resold private lines or IP-based transport services. Hudson Fiber Network Inc's subsidiary, Hudson Fiber Network (Virginia), LLC, provides competitive telecommunications services in Virginia. Hudson Fiber Network (Virginia), LLC is a Virginia limited liability company.

Additional Affiliations

In addition the entities identified in the Joint Application, Transferee identified an additional domestic telecommunications provider in which the Teacher Retirement System of Texas ("TRS-TX") owns or controls a 10% or greater direct or indirect interest through its 11.1% limited partner interest in Grain Communications Opportunity Fund II, L.P., which also indirectly majority owns Great Plains Communications, LLC.

WANRack, LLC

Grain Communications Opportunity Fund II, L.P. owns a controlling interest in WANRack, LLC. WANRack, LLC is a competitive provider that builds private fiber networks for K-12 school districts, providing services that include E-Rate compliant lit fiber, dark fiber, and special construction services. In connection with these offerings, WANRack, LLC is authorized to provide intrastate telecommunications services in Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Missouri, Montana, Nevada, Ohio, Oklahoma, Pennsylvania, Texas, Virginia, Washington, and Wyoming.

Please do not hesitate to contact us with any questions.

Respectfully submitted,

/S/

Michael P. Donahue

Counsel for Wyverd Group Holdings, LLC

cc: Brett P. Ferenchak (Morgan Lewis - Counsel for Accipiter Communications, Inc.)