

March 10, 2021

Via ECFS and IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: WC Docket No. 21-69
IB File No. ITC-T/C-20210226-00037
IB File No. ITC-T/C-20210226-00038
IB File No. ITC-T/C-20210226-00039**

Dear Secretary Dortch:

On February 26, 2021, Hargray Acquisition Holdings, LLC (“Hargray” or “Transferor”), the Licensees,¹ and Cable One, Inc. (“Cable One” or “Transferee”) (Hargray, Licensees, and Cable One collectively, the “Applicants”) filed a Joint Application seeking Federal Communications Commission (“Commission”) approval to transfer indirect control of the Licensees to Transferee. Pursuant to a request from Commission staff, the Applicants seek to supplement the Joint Application with additional information concerning the ownership interests of certain entities that hold an ownership interest in Cable One as explained below.

T. Rowe Price Associates, Inc.

The Joint Application stated that T. Rowe Price Associates, Inc. (“T. Rowe”) beneficially owned 12.5% of Cable One’s outstanding common stock as of December 31, 2020. T. Rowe is a wholly owned subsidiary of T. Rowe Price Group, Inc. (“TROW”). As set forth on the TROW website,² the following individuals are on the Board of Directors of TROW:

- Mark S. Bartlett
- Mary K. Bush
- Dina Dublon
- Dr. Freeman A. Hrabowski, III
- Robert F. MacLellan³
- Olympia J. Snowe
- Robert Stevens

¹ The Licensees are: (1) Low Country Carriers, Inc.; (2) Hargray Telephone Company, Inc.; (3) Bluffton Telephone Company, Inc.; (4) Hargray, Inc.; (5) Hargray of Alabama, Inc.; (6) Hargray of Florida, Inc.; (7) Hargray of Georgia, Inc.; (8) ComSouth Telecommunications, Inc.; (9) ComSouth Telenet, Inc.; and (10) ComSouth Teleservices, Inc.

² <https://www.troweprice.com/corporate/us/en/what-we-do/leadership.html> (last visited March 9, 2021).

³ Mr. MacLellan is a citizen of Canada.

- Bill Stromberg (Chief Executive Officer)
- Richard Verma
- Sandra S. Wijnberg
- Alan D. Wilson

Unless otherwise noted above, each of the members of the TROW Board of Directors are U.S. citizens.⁴

Aside from normal-course rights as a beneficial holder of Cable One's common stock, neither T. Rowe nor TROW hold any additional rights to participate in the management or operation of Cable One. Neither T. Rowe nor TROW have the power to individually elect or block the election of any officer or director of Cable One, and do not have any control over or involvement in the day-to-day operations or management of the businesses of Cable One and its subsidiaries.

BlackRock, Inc.

The Joint Application stated that BlackRock, Inc. ("BlackRock") beneficially owned 10.4% of Cable One's outstanding common stock as of December 31, 2020. As set forth on the BlackRock website,⁵ the following individuals are on the Board of Directors of BlackRock:

- Laurence D. Fink (Chairman and Chief Executive Officer)
- Bader M. Alsaad⁶
- Mathis Cabiallavetta⁷
- Pamela Daley
- Jessica Einhorn
- William E. Ford
- Fabrizio Freda⁸
- Murry S. Gerber
- Margaret L. Johnson
- Robert S. Kapito
- Cheryl Mills
- Gordon M. Nixon⁹

⁴ Information regarding the citizenship of the TROW Board members was not available in a single, consolidated location. With four exceptions, Cable One confirmed the citizenship of each TROW Board member using Securities and Exchange Commission filings made by the other publicly-traded companies in which the Board member is or was involved. Cable One confirmed Ms. Snowe's citizenship via the Biographical Directory of the United States Congress. Cable One confirmed Mr. Stevens' citizenship via the Naval Order of the United States website. Cable One confirmed the citizenship of Mr. Bartlett and Mr. Verma through discussions with TROW counsel.

⁵ <https://ir.blackrock.com/governance/board-of-directors/default.aspx> (last visited March 9, 2021).

⁶ Mr. Alsaad is a citizen of Kuwait.

⁷ Mr. Cabiallavetta is a citizen of Switzerland.

⁸ Mr. Freda is a dual citizen of the U.S. and Italy.

- Charles H. Robbins
- Marco Antonio Slim Domit¹⁰
- Susan L. Wagner
- Mark Wilson¹¹

Unless otherwise noted above, each of the members of the BlackRock Board of Directors are U.S. citizens.¹²

Aside from normal-course rights as a beneficial holder of Cable One's common stock, BlackRock does not hold any additional rights to participate in the management or operation of Cable One. BlackRock does not have the power to individually elect or block the election of any officer or director of Cable One, and does not have any control over or involvement in the day-to-day operations or management of the businesses of Cable One and its subsidiaries.

The Joint Application listed certain telecommunications-related entities in which BlackRock held a ten percent (10%) or greater interest as of December 31, 2020 (the "BlackRock Telecom Entities"). Cable One is unable to determine with specificity the domestic telecommunications service providers (other than Cable One's subsidiaries) in which BlackRock may have a ten percent (10%) or greater ownership interest. To develop the list of BlackRock Telecom Entities set forth in the Joint Application, Cable One used third-party software (Ipreo now known as IHS Markit) to analyze the SEC Form 13F filed by BlackRock for the period ending December 31, 2020.

After receiving Commission staff's request for additional information on the BlackRock Telecom Entities, Cable One also reviewed the FCC Forms 602 and/or FCC Forms 175 on file in the Commission's Universal Licensing System ("ULS") that list BlackRock as a disclosable interest holder. As a result of that review, Cable One adds an additional entity – Telephone and Data Systems, Inc. – to the list of BlackRock Telecom Entities set forth in the Joint Application.¹³

As requested by Commission staff, Cable One provides the following information on the services provided by the BlackRock Telecom Entities and the states in which those services are provided:

⁹ Mr. Nixon is a citizen of Canada.

¹⁰ Mr. Slim is a citizen of Mexico.

¹¹ Mr. Wilson is a citizen of New Zealand.

¹² The citizenship information for the BlackRock Board of Directors can be found at: https://www.sec.gov/Archives/edgar/data/1364742/000089534521000057/ja13da3-eurodry_blackrock.htm (filed Jan. 29, 2021).

¹³ Based on the FCC Form 602 filed by Telephone and Data Systems, Inc. on September 16, 2020, BlackRock holds approximately 14.3% of the outstanding common shares of Telephone and Data Systems, Inc.

BlackRock Telecom Entity	Services Offered	States in Which Service Offered
8x8, Inc. and subsidiaries	Interconnected VoIP	All states, DC, PR, USVI
ATN International, Inc. and subsidiaries ¹⁴	Wholesale wireless or domestic fixed wireless broadband Internet access services	USVI, AZ, CA, CO, MT, NV, NM, TX, UT, WY
	Local exchange services	USVI
Cincinnati Bell, Inc. and subsidiaries	ILEC, CLEC	IN, KY, OH, HI
	Interconnected VoIP	50 states, DC
	ILEC, Toll reseller	HI
Cogent Communications Holdings, Inc. and subsidiaries	Private service provider	DC and all states except AK, HI, MT, VT, WY
Consolidated Communications Holdings, Inc. and subsidiaries	ILEC, CLEC, IXC, Interconnected VoIP, Payphone	AL, CA, CO, FL, GA, IL, IA, KS, ME, MA, MN, MO, NH, NY, ND, OH, OK, PA, SD, TX, VT, WA, WI
Iridium Communications, Inc. and subsidiaries	Private service provider	VA
J2 Global, Inc. and subsidiaries	Non-interconnected VoIP	All states, DC, PR, USVI, AS, MP, WK, UM
Shenandoah Telecommunications Company and subsidiaries	ILEC, CLEC, IXC	KY, MD, PA, VA, WV
Spok Holdings, Inc. and subsidiaries	Paging & Messaging	All states, DC, PR, USVI

¹⁴ WC Docket No. 21-23, Joint Application for Consent to Transfer Control of Domestic and International Section 214 Authorizations (filed January 21, 2021).

BlackRock Telecom Entity	Services Offered	States in Which Service Offered
Uniti Group Inc. and subsidiaries, including PEG Bandwidth and Talk America entities	Mobile, CLEC, Local reseller	DC and all states except AK and HI
Telephone and Data Systems, Inc. and subsidiaries	ILEC, Interconnected VoIP, CLEC	AL, AR, AZ, CA, CO, CT, FL, GA, ID, IL, IN, KY, LA, MA, ME, MI, MN, MO, MS, NC, NH, NM, NV, NY, OH, OK, OR, PA, SC, TN, TX, UT, VA, VT, WA, WI
Vonage Holdings Corp. and subsidiaries	Interconnected VoIP, Non-interconnected VoIP	All states, DC, PR, USVI

Unless otherwise stated, information regarding the services offered and the states in which service is offered was retrieved from the Commission's FCC Form 499 Filer Database.¹⁵

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Rebekah P. Goodheart

Rebekah P. Goodheart
David M. Didion
JENNER & BLOCK LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001
202-639-6000 (telephone)
rgoodheart@jenner.com
ddidion@jenner.com

Counsel for Transferor and Licensees

/s/ Chérie R. Kiser

Chérie R. Kiser
Angela F. Collins
CAHILL GORDON & REINDEL LLP
1990 K Street, NW, Suite 950
Washington, DC 20006
202-862-8900 (telephone)
ckiser@cahill.com
acollins@cahill.com

Counsel for Transferee

¹⁵ The FCC Form 499 Filer Database was last visited March 5, 2021.