

Attachment 1

Answer to Question 10

Response to 63.18(c):

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With a copy to:

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Response to 63.18(d):

Statement regarding previous 214 authority:

GTel and Valstar each hold a domestic Section 214 authorization pursuant to 47 C.F.R. § 63.01. Valstar also holds an international Section 214 authorization to provide global resold telecommunications services between the United States and international points (File No. ITC-214-20000313-00141).¹ Archtop does not hold any Section 214 authorizations.

Answer to Question 11

The following entities will hold a direct or indirect 10 percent or greater ownership interest in Licensees, post-closing:

Name:	Archtop Fiber LLC
Address:	300 Enterprise Drive Kingston, NY 12401
Citizenship:	Delaware
Principal Business:	Operating Company
Ownership Interest:	100% direct voting and equity interest in Licensees

Name:	Archtop Fiber Intermediate LLC
Address:	300 Enterprise Drive Kingston, NY 12401
Citizenship:	Delaware
Principal Business:	Holding Company
Ownership Interest:	100% indirect voting and equity interest in Licensees

Name:	Archtop Fiber Holdings LLC
Address:	300 Enterprise Drive Kingston, NY 12401
Citizenship:	Delaware
Principal Business:	Holding Company
Ownership Interest:	100% indirect voting and equity interest in Licensees

¹ See International Bureau, *International Authorizations Granted*, Public Notice, DA 00-846 (rel. Apr. 13, 2000).

Name: Post Road Digital Infrastructure Fund I LLC
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 98% indirect voting and equity interest in Licensees

Name: Post Road Digital Infrastructure Fund I LP
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 100% indirect voting and equity interest in Licensees

Name: Post Road DIF I GP LLC
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 100% indirect voting and equity interest in Licensees

Name: Post Road Special Opportunity Fund II
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 11.4% indirect voting and equity interest in Licensees²

Name: Post Road Special Opportunity Fund II Offshore LP
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Cayman Islands
Principal Business: Investment Company
Ownership Interest: 11.4% indirect voting and equity interest in Licensees³

Name: OPTrust Infrastructure Direct N.A. VII Inc.
Address: 1 Adelaide St. East, Suite 1200, Toronto, ON M5C 3A7
Citizenship: Ontario, Canada
Principal Business: Investment Company
Ownership Interest: 49.5% indirect voting and equity interest in Licensees

Name: OPSEU Pension Plan Trust Fund
Address: 1 Adelaide St. East, Suite 1200, Toronto, ON M5C 3A7

² Combined interest held with Post Road Special Opportunity Fund II Offshore LP.

³ Combined interest held with Post Road Special Opportunity Fund II.

Citizenship: Ontario, Canada
Principal Business: Public Pension Plan
Ownership Interest: 49.5% indirect voting and equity interest in Licensees

Name: PRG Investment Holdings LP
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 100% indirect voting and equity interest in Licensees

Name: Post Road Group Holdings LP
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 100% indirect voting and 80% equity interest in Licensees

Name: Post Road Group GP LLC
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 100% indirect voting general partner interest in Licensees

Name: Seventh Avenue Capital Group LLC
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 50% indirect voting and equity interest in Licensees

Name: Seventh Avenue Capital Group II LLC
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment Company
Ownership Interest: 45% indirect equity interest in Licensees

Name: Kevin Davis
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: United States
Principal Business: Investor
Ownership Interest: 100% indirect voting and equity interest in Licensees

Name: Birch Hill Capital LLC
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: United States
Principal Business: Investor
Ownership Interest: 50% indirect voting and equity interest in Licensees

Name: Michael Bogdan
Address: 2 Landmark Square
Stamford, CT 06901
Citizenship: United States
Principal Business: Investor
Ownership Interest: 100% indirect voting and equity interest in Licensees

No other person or entity will hold a direct or indirect 10 percent or greater equity or voting interest in Licensees, post-closing. Attachments 2 and 3, respectively, provide organizational diagrams depicting the pre- and post-closing ownership structure of Licensees.

Answer to Question 13

On November 10, 2022, Transferors and Archtop entered into a Stock Purchase Agreement (the “Agreement”). Pursuant to the Agreement, and subject to all necessary Commission and state commission approvals, Archtop proposes to acquire 100% of the equity interests in GTel in an all-cash transaction. As a result of the Transaction, Archtop will acquire one hundred percent of the equity and voting interest in the Licensees, and thus directly control the Licensees.

Archtop’s leadership team and its investors have a long and established track record of successfully executing transactions of this type. Funding for the Transaction will be sourced from a combination of funds from the Archtop management team and Archtop’s financial partner, Post Road Group (“PRG”) and its affiliates. PRG invests in successful and dynamic telecommunications companies, partnering with best-in-class management teams, entrepreneurs and founders who are passionate about growing their businesses.

PRG is an alternative investment advisory firm focused on making private equity and private credit investments in digital infrastructure and real estate. Since its founding in 2015, the firm has invested over \$1.7 billion in private equity, corporate credit, and real estate. It has completed 18 transactions in the digital infrastructure sector by partnering with best-in-class management teams to identify, validate, and capitalize businesses that can create long-term value through accelerated growth. PRG prides itself on its ability to provide flexible capital solutions and bring its broad network of resources to every partnership, with the single unified goal of increasing enterprise value while preserving culture and supporting all stakeholders.

Although the Transaction will result in a change in the ultimate control of the Licensees, it will not have any immediate effect on the Licensees' operations, nor will it adversely affect any of the customers who receive services in connection with the Licensees' ongoing operations. Current customers will continue to receive services over the same network and under the same terms and conditions – and under the same brand name – after the Transaction is complete, and any future changes to the rates, terms, and conditions of service will be undertaken pursuant to customers' contracts, tariffs, and applicable law. Moreover, the Licensees will retain the assets used in the provision of their services. The Applicants have thus ensured the Transaction will have no adverse effect on the Licensees' customers.
