

Morgan Lewis

Joshua M. Bobeck

Patricia Cave

joshua.bobeck@morganlewis.com

patricia.cave@morganlewis.com

February 24, 2026

VIA ICFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street, N.E.
Washington, DC 20554
Attn: Office of International Affairs

Re: Notification Regarding the *Pro Forma* Restructuring of TEO Communications Inc., Crown Point Network Technologies, Inc. d/b/a Bridge Point Communications, Nicholville Telco LLC, SLIC Network Solutions, Inc., and Westelcom Network, Inc.

Dear Secretary Dortch:

TEO Communications Inc. ("TEO"); Crown Point Network Technologies, Inc. d/b/a Bridge Point Communications ("Bridge Point"); Nicholville Telco LLC ("Nicholville"); SLIC Network Solutions, Inc. ("SLIC"); and Westelcom Network, Inc. ("Westelcom") (collectively, the "Licensees"), pursuant to 47 C.F.R. § 63.24(f), notify the Commission of a *pro forma* change in the intermediate ownership of Licensees completed on January 29, 2026.

The *Pro Forma* Restructuring (as defined in Attachment 1) introduced new intermediate entities in the chain of Licensees' ownership, without changing their ultimate ownership and control. The intra-company transactions interposed a new intermediate ownership structure between the ultimate controlling parties in SDC Digital Infrastructure III UGP, LLC ("SDC Fund III UGP"), which is the general partner of SDC DIOF III GP, L.P. ("SDC Fund III GP"), the general partner of SDC Digital Infrastructure Opportunity Fund III, L.P. ("SDC Fund III"), investment fund that indirectly holds the equity interests in Licensees, and SDC Fund III UGP.

The *Pro Forma* Restructuring was an entirely parent level event that did not result in any change to ultimate ownership and control of Licensees. Because the ultimate control and ownership of Licensees did not change, the *Pro Forma* Restructuring was *pro forma* in nature.

Morgan, Lewis & Bockius LLP

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

T +1.202.739.3000
F +1.202.739.3001

Information Required by Section 63.24(f)(2)

As required by Section 63.24(f)(2), the Licensees provide the following information required by 63.18(a) through (d) and (h):

Sections 63.18(a): Name, address and telephone number of the Licensees:

TEO Communications Inc.
Crown Point Network Technologies, Inc. d/b/a Bridge Point Communications
Nicholville Telco LLC
SLIC Network Solutions, Inc.
Westelcom Network, Inc.
3330 State Highway 11-B
P.O. Box 150
Nicholville, New York 12965
(315) 274-9050

Sections 63.18(b): Organization of the Parties:

TEO is a New York corporation.

Bridge Point is a New York corporation.

Nicholville is a New York limited liability company.

SLIC is a New York corporation.

Westelcom is a New York corporation.

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

Joshua M. Bobeck
Patricia Cave
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., N.W.
Washington, DC 20004-2541
Tel: 202-739-3000
Fax: 202-739-3001
joshua.bobek@morganlewis.com
patricia.cave@morganlewis.com

With copies to:

Vlada Rebeiz
SDC Capital Partners
817 Broadway, 10th Floor
New York, New York 10003
vrebeiz@sdccapitalpartners.com

and:

Kevin Lynch
Chief Executive Officer
ATLAS CONNECTIVITY, LLC
3330 State Highway 11-B
Nicholville, NY 12965
Tel: (315) 274-9050
kevin.lynch@slcfiber.com
legal@slcfiber.com

Section 63.18(d):

TEO holds international Section 214 authority to provide global and limited global resale services granted in IB File No. ITC-214-20200813-00155.

Bridge Point holds international Section 214 authorization to provide global and limited global resale services granted in IB File Nos. ITC-214-20030109-00004 and ITC-214-20080826-00403.

Nicholville holds international Section 214 authority to provide global and limited global resale services granted in IB File No. ITC-214-20171229-00234.

SLIC holds international Section 214 authority to provide global and limited global resale services granted in IB File No. ITC-214-20171229-00233.

Westelcom holds international Section 214 authority to provide global and limited global resale services granted in IB File No. ITC-214-20000721-00475.

Licensees are also 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 Licensees and a description of the *Pro Forma* Restructuring. See **Attachment 2** for charts depicting the pre-*Pro Forma* Restructuring and current corporate ownership structure of Licensees.

Licensees certify that the *Pro Forma* Restructuring was *pro forma*, and did not result in a change in the actual controlling party of the Licensees or the authorizations held by the Licensees.

* * * *

Marlene Dortch, Secretary
February 24, 2026
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This notification letter is being filed electronically. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Patricia Cave

Joshua M. Bobeck
Patrica Cave

Counsel for the Licensees

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 TEO Communications Inc. ("TEO"); Crown Point Network Technologies, Inc. d/b/a Bridge Point Communications ("Bridge Point"); Nicholville Telco LLC ("Nicholville"); SLIC Network Solutions, Inc. ("SLIC"); and Westelcom Networks, Inc. ("Westelcom") (collectively, the "Licensees"), as calculated pursuant to the Commission's ownership attribution rules for international telecommunications carriers.

1. Name: Atlas Connectivity, LLC
 Jurisdiction of Formation: Delaware
 Address: 817 Broadway, 10th Floor
 New York, New York 10003
 Principal Business: Holding Company
 Interest Held: 100% equity/voting interest (as (1) sole direct owner of each of Nicholville and SLIC, and (2) sole owner of Crown Point Telephone Corporation, which directly and wholly owns Bridge Point; and (3) sole owner of Westelcom Communications, Inc. which directly and wholly owns TEO and Westelcom)

2. Name: SDC Atlas AcquisitionCo, LLC
 Jurisdiction of Formation: Delaware
 Address: 817 Broadway, 10th Floor
 New York, New York 10003
 Principal Business: Holding Company
 Interest Held: 100% equity/voting interest (as sole owner of Atlas Connectivity, LLC)

3. Name: SDC Atlas Intermediate Holdings, LLC
 Jurisdiction of Formation: Delaware
 Address: 817 Broadway, 10th Floor
 New York, New York 10003
 Principal Business: Holding Company
 Interest Held: 100% equity/voting interest (as sole owner of SDC Atlas AcquisitionCo, LLC)

4. Name: SDC Atlas Holdings, LLC
 Jurisdiction of Formation: Delaware
 Address: 817 Broadway, 10th Floor
 New York, New York 10003
 Principal Business: Holding Company

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

Interest Held: 100% equity/voting interest (as sole owner of SDC Atlas Intermediate Holdings, LLC)

5. Name: SDC Atlas Member, LLC
Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Holding Company
Interest Held: Approx 90% equity and 100% voting interest (through 90% equity interest in SDC Atlas Holdings, LLC)²
6. Name: SDC Digital Infrastructure Opportunity Fund III, L.P.
Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Investment Fund
Interest Held: Approx. 90% equity and 100% voting interest (as sole owner of SDC Atlas Member, LLC)
7. Name: SDC DIOF III GP, LP
Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Holding Company
Interest Held: Less than 5% equity and 100% voting interest (as general partner owning less than 5% equity in SDC Digital Infrastructure Opportunity Fund III, L.P.)
8. Name: SDC Digital Infrastructure III UGP, LLC
Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Investment Activities
Interest Held: Less than 5% equity and 100% voting interest (as general partner of SDC DIOF III GP, L.P.)
9. Name: SDC Capital Partners GP Holdings, LP
Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Holding Company
Interest Held: Less than 5% and 100% voting interest (as sole owner of SDC Digital Infrastructure III UGP, LLC)
10. Name: SDC Capital Partners GP Holdings Parent 2, LP

² Other investors and management incentive plan participants collectively hold a ten percent (10% interest) in SDC Atlas Holdings, LLC with none individually holding a, direct or indirect, a ten percent (10% interest) or greater interest in Licensees.

Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Holding Company
Interest Held: Less than 5% equity and 100% voting interest (as limited partner of SDC Capital Partners GP Holdings, LP)

11. Name: SDC Capital Partners GP, LLC
Jurisdiction of Formation: Delaware
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Holding Company
Interest Held: 0% equity and 100% voting interest (as general partner of SDC Capital Partners GP Holdings Parent 2, LP and SDC Capital Partners GP Holdings, LP)
12. Name: Todd Aaron
Citizenship: U.S. Citizen
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Individual
Interest Held: 0% equity and 100% voting interest (through 51% voting control of SDC Capital Partners GP, LLC)
13. Name: Douglas Kaden
Citizenship: U.S. Citizen
Address: 817 Broadway, 10th Floor
New York, New York 10003
Principal Business: Individual
Interest Held: 0% equity and 49% voting interest (through a 49% voting interest in SDC Capital Partners GP, LLC)

To the Licensees' knowledge, no other person or entity, directly or indirectly, owns or controls a 10% or greater interest in Licensees.

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

Licensees do not 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 *Pro Forma* Restructuring

On January 29, 2026, SDC Capital undertook an internal restructuring for tax and business efficiency purposes that established a new intermediate ownership structure between Todd Aaron ("Mr. Aaron") and Douglas Kaden ("Mr. Kaden") and SDC Digital Infrastructure III UGP, LLC ("SDC

Fund III UGP”), the general partner of SDC DIOF III GP, L.P. (“SDC Fund III GP”), which itself is the general partner of SDC Digital Infrastructure Opportunity Fund III, L.P. (“SDC Fund III”) that controls the investment fund that has majority ownership of Licensees.

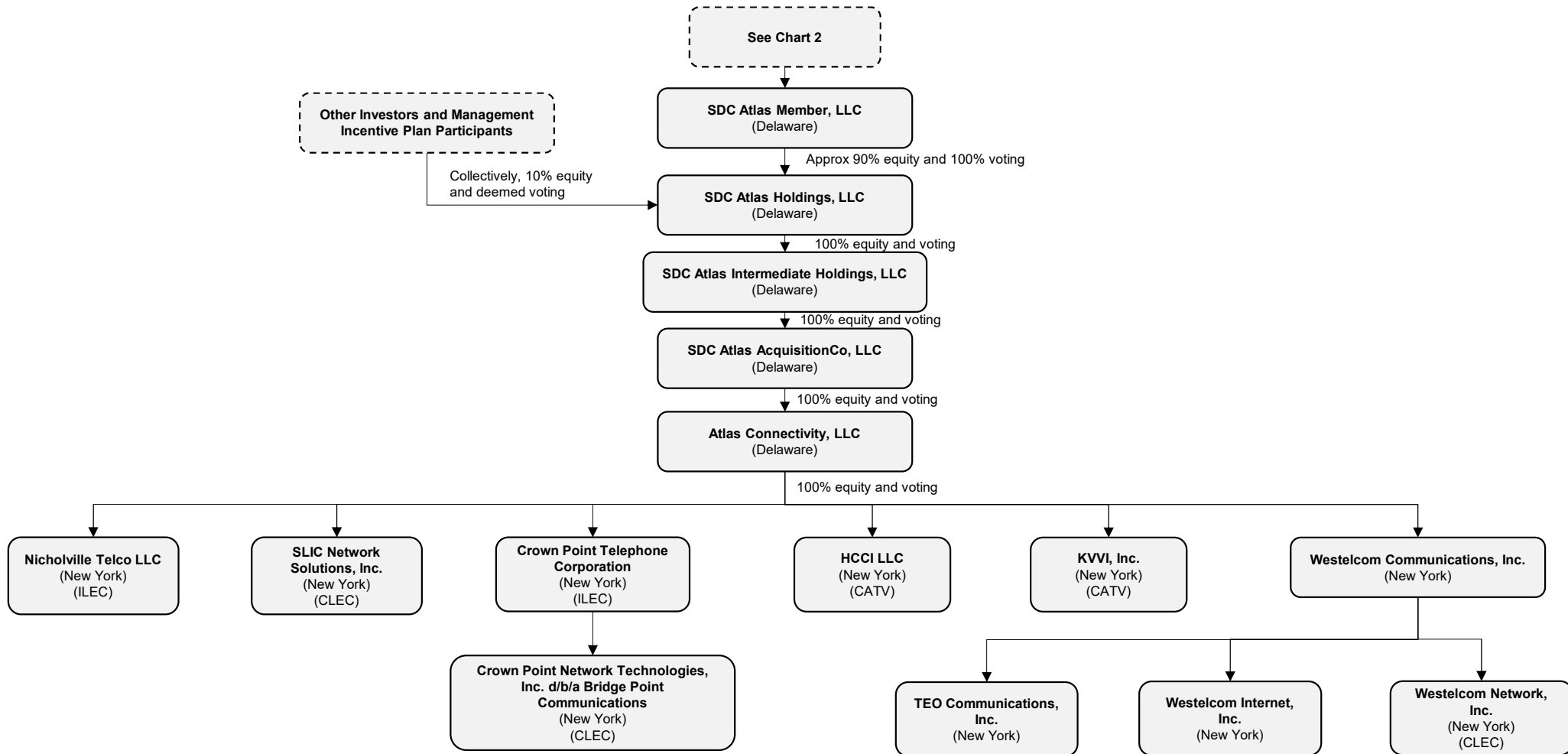
Licensees are owned and controlled by SDC Fund III. The general partner of SDC Fund III is SDC Fund III GP, which in turn is controlled by SDC Fund III UGP. Prior to the *Pro Forma* Restructuring, Mr. Kaden and Mr. Aaron each held their interests in SDC Fund III UGP through a series of personal and family holding entities.

As a result of the *Pro Forma* Restructuring, those personal holding entities no longer hold direct interests in SDC Fund III UGP, but instead such interests were indirectly transferred to SDC Capital Partners GP Holdings, LP (“GP Holdings”) which is now the sole member of SDC Fund III UGP. Mr. Kaden and Mr. Aaron’s interests (held through their personal holding entities) are now held in SDC Capital Partners GP Holdings Parent 2, LP (“GP Holdings Parent 2”) and in SDC Capital Partners GP, LLC (“SDC GP”), the sole general partner of both GP Holdings and GP Holdings Parent 2. Mr. Aaron indirectly holds a 51% voting interest in SDC GP, and Mr. Kaden indirectly holds a 49% voting interest in SDC GP. Charts depicting the pre- and post-*Pro Forma* Restructuring ownership structure of Licensees are attached as **Attachment 2**.

ATTACHMENT 2

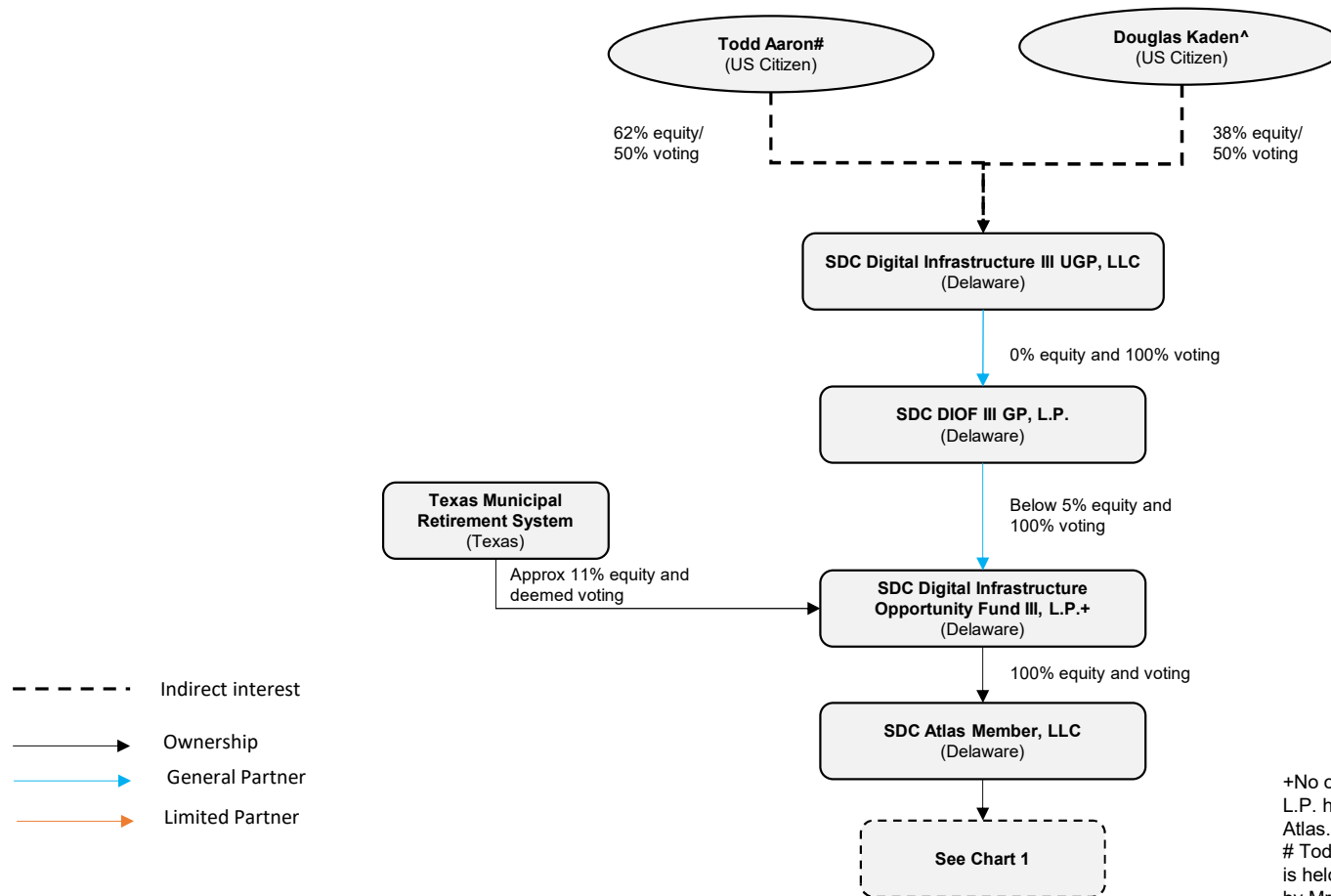
Pre- and Post-*Pro Forma* Restructuring Corporate Ownership Structure Charts

Chart 1: Pre-Pro Forma Restructuring Ownership Structure of Atlas Subsidiaries



Unless otherwise indicated, all ownership/control percentages are 100%.

Chart 2: Pre-Pro Forma Restructuring Ownership Structure of SDC Atlas Member, LLC



+No other limited partners in SDC Digital Infrastructure Opportunity Fund III, L.P. hold an interest that amounts to an indirect interest of 10% or greater in Atlas.

Todd Aaron's interest in SDC Digital Infrastructure III UGP, LLC is held through a series of personal and family investment vehicles controlled by Mr. Aaron.

^ Douglas Kaden's interest in SDC Digital Infrastructure III UGP, LLC is held through a series of personal and family investment vehicles controlled by Mr. Kaden.

Chart 3: Post-Pro Forma Restructuring Ownership Structure of SDC Atlas Member, LLC

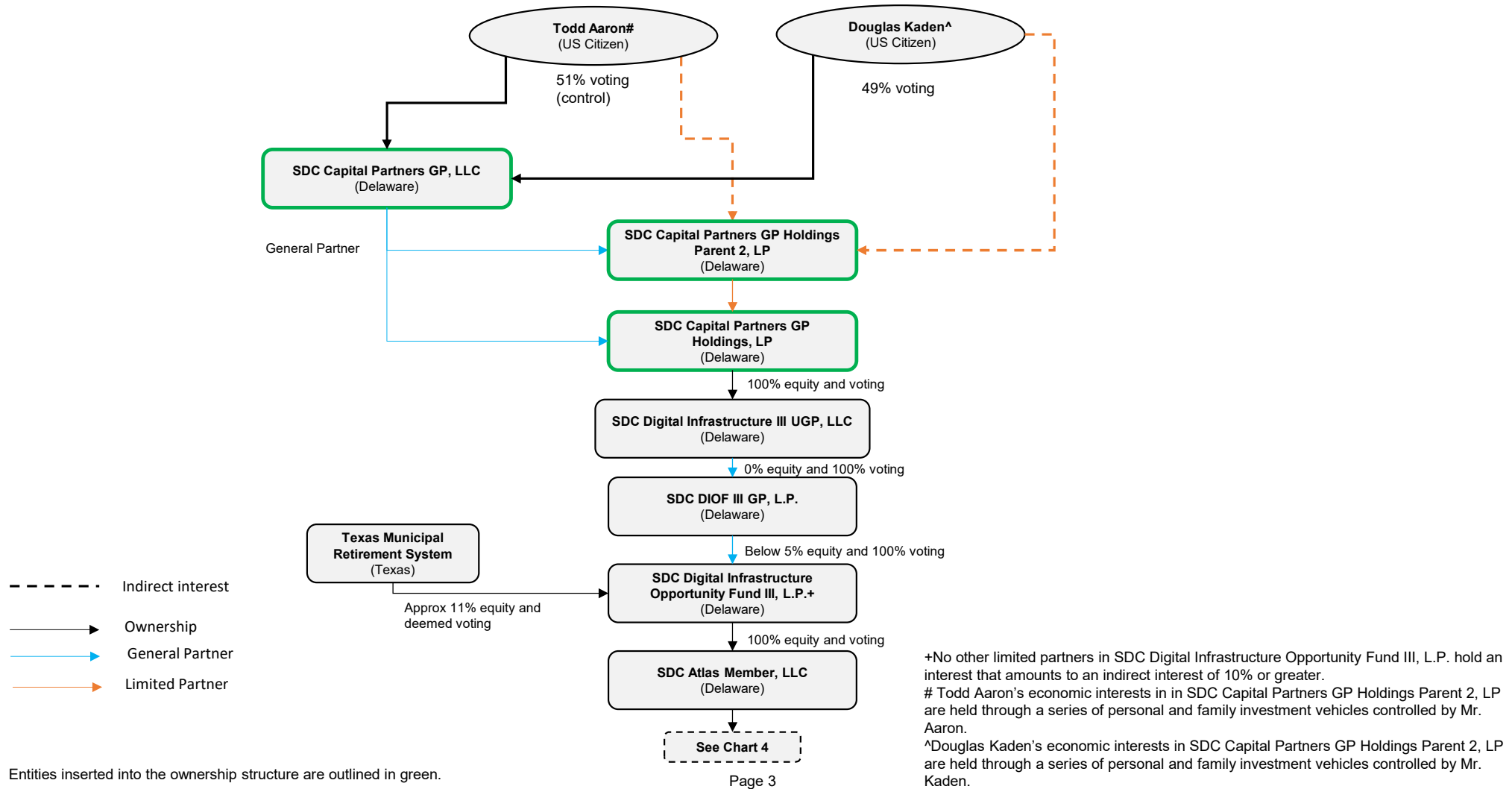
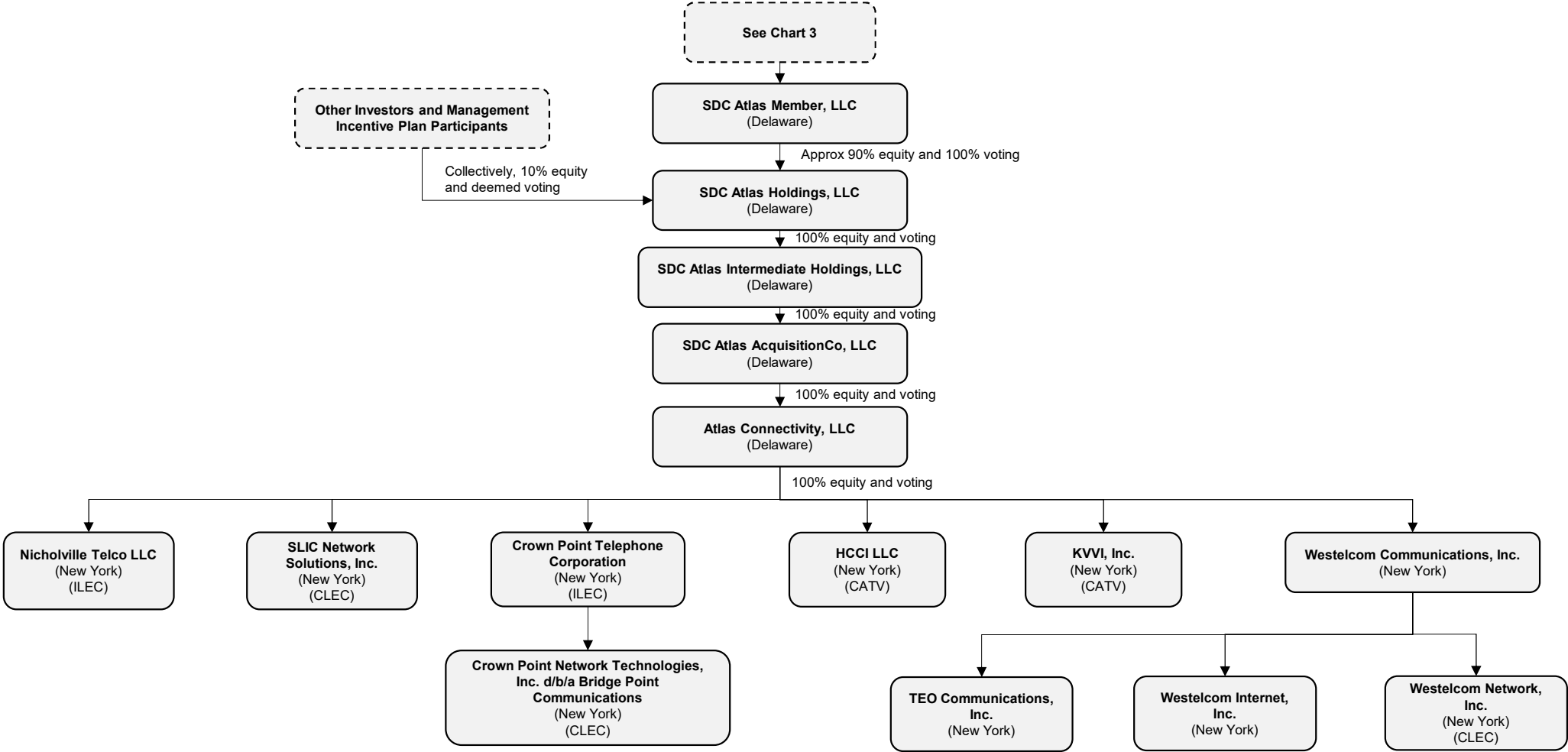


Chart 4: Post-Pro Forma Restructuring Ownership Structure of Atlas Subsidiaries



VERIFICATION

I, Kevin Lynch, hereby declare that I am Chief Executive Officer of Atlas Connectivity, LLC, the indirect parent of TEO Communications Inc. (“TEO”); Crown Point Network Technologies, Inc. d/b/a Bridge Point Communications (“Bridge Point”); Nicholville Telco LLC (“Nicholville”); SLIC Network Solutions, Inc. (“SLIC”); and Westelcom Network, Inc. (“Westelcom” and together with TEO, Bridge Point, Nicholville, and SLIC the “Licensees”); that I am authorized to make this Verification on behalf of the Licensees; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Licensees 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: February 20, 2026.



Kevin Lynch
Chief Executive Officer
Atlas Connectivity, LLC