

In the Matter of the Joint Application of

Yankee Telecom, Inc.
Transferor

and

TDS Telecommunications LLC,
Transferee

for Grant of Authority Pursuant to Section 214
of the Communications Act of 1934, as Amended,
and Sections 63.04, 63.12, and 63.24(c) of the
Commission's Rules to Complete a Transfer
of Control

Pursuant to Section 214 of the Communications Act of 1934, as amended (the “Act”),¹ and Sections 63.04, 63.12, and 63.24(c) of the Commission’s Rules,² Yankee Telecom, Inc. (“Yankee Telecom” or “Transferor”) and TDS Telecommunications LLC (“TDS Telecom” or “Transferee” and, together with the Transferor, the “Applicants”), hereby jointly request the Commission’s consent to transfer indirect control of Granite State Long Distance, Inc. (“GSLD”) and Granite State Telephone, Inc. (“GST”) (together, the “Licensees”), as a result of a Stock Purchase Agreement dated April 17, 2026, by and among TDS Telecom and the shareholders of Yankee Telecom for the purchase by TDS Telecom of all stock in Yankee Telecom (the “Proposed Transaction”). GSLD and GST are wholly owned subsidiaries of Yankee Telecom. As

² 47 C.F.R. §§ 63.04, 63.12 and 63.24(c).

explained more fully herein, the Commission's grant of this application will promote the public interest.

I. DESCRIPTION OF THE APPLICANTS

A. TRANSFEROR

1. Yankee Telecom, Inc.

Yankee Telecom is a corporation incorporated under the laws of the State of New Hampshire. Yankee Telecom is the sole shareholder of the Licensees. Yankee Telecom is a holding company and does not hold any Commission or other authorizations to provide telecommunications services.

2. Granite State Long Distance, Inc.

GSLD, a corporation incorporated under the laws of the State of New Hampshire, is a wholly owned subsidiary of Yankee Telecom. GSLD was formed in 1994 with a plan to provide long-distance telephone services in the State of New Hampshire. GSLD was granted authority by the New Hampshire Public Utilities Commission ("NHPUC") on May 13, 1996, to offer intrastate long-distance services on a resold basis in the State of New Hampshire. In addition, GSLD offers resold interstate long distance services under the so-called "blanket" Section 214 authorization issued by the Commission in 1999.³

GSLD also holds Section 214 international authorization from the Commission, in File No. ITC 96-019, to offer global or limited resale service pursuant to Section 63.18(e)(2) of the Commission's rules.⁴

³ *In the Matters of Implementation of Section 402(b)(2)(A) of the Telecommunications Act of 1996 and Petition for Forbearance of the Independent Telephone & Telecommunications Alliance*, CC Docket No. 97-11, AAD File No. 98-43, Report and Order (CC Docket No. 97-11) and Second Memorandum Opinion and Order (AAD File No. 98-43) (FCC 99-104), 14 FCC Rcd. 11364, 11372-11374 (F.C.C. rel. June 30, 1999) ¶¶ 12-16.

⁴ 47 C.F.R. § 63.18(e)(2).

3. Granite State Telephone, Inc.

Granite State Telephone, Inc., a corporation incorporated under the laws of the State of New Hampshire, is a wholly owned subsidiary of Yankee Telecom. GST is an “incumbent local exchange carrier” (“ILEC”) as defined in 47 U.S.C. § 251(h)(1)) and a “rural telephone company” (“RLEC”) as defined in 47 U.S.C. § 153(44). Formed in 1935 for the purpose of offering local exchange telephone services in certain rural areas of New Hampshire, GST now provides voice and broadband services to residential customers and businesses in its study area using fiber-to-the-home technologies. Its rural study area (SAC 120039) consists of the telephone exchanges of Weare (603-529), Chester (603-887), Hillsboro Upper Village (603-478), and Washington (603-495).⁵

GST is certified by the NHPUC as a local exchange carrier and is designated by the NHPUC as an eligible telecommunications carrier (“ETC”) in its study area. GST currently receives federal Universal Service Fund (“USF”) support in the form of Enhanced Alternative Connective America Fund Cost model (“E-ACAM”) and Connect America Fund Inter-carrier Compensation (“CAF-ICC”). GST also participates in the Commission’s Lifeline program and, until its expiration, participated in the Affordable Connectivity Program (“ACP”).

GST will continue to receive USF support and will continue to participate in the Lifeline program following consummation of the Transaction. Additional information about the USF support received by GST is provided below in Section I.D.

⁵ GST also holds three (3) Radio Station Authorizations (Call Signs: WBB295, WBB296, and WBB297) from the Wireless Telecommunications Bureau. As referenced in Section V, subparagraph 9 *infra*, these authorizations are subject to a separate license transfer proceeding now pending before the WTB.

B. TRANSFEREE

1. TDS Telecommunications LLC

TDS Telecommunications LLC, is a Delaware limited liability company and a wholly owned subsidiary of Telephone and Data Systems, Inc. (“TDS”). TDS Telecom, through its wholly owned subsidiaries, delivers high-speed Internet, TV entertainment, and telecommunications services to customers in a mix of small- to mid-sized urban, suburban, and rural communities throughout the United States. TDS Telecom, through its wholly owned subsidiaries, also offers business VoIP, advanced communications solutions, dedicated Internet service, data networking, and hosted-managed services to customers in the regions it serves.

TDS Telecom directly owns all of the issued and outstanding shares of capital stock of the following operating subsidiaries, each of which is a New Hampshire corporation: Hollis Telephone Company, Inc. (“HTC”); Kearsarge Telephone Company (“KTC”); Merrimack County Telephone Company (“MCTC”); Union Telephone Company (“UTC”); and Wilton Telephone Company, Inc. (“WTC” and, together with HTC, KTC, MCTC and UTC, the “TDS New Hampshire Companies”). Each of the TDS New Hampshire Companies is certified as an ILEC and designated as an ETC by the NHPUC in its respective rural study area. As further detailed below in Section I.D, each of the TDS New Hampshire Companies receives federal USF support in the form of E-ACAM and CAF-ICC support. The TDS New Hampshire Companies all participate in the Lifeline program and, until its expiration, they each participated in ACP.

C. GEOGRAPHIC AND SERVICE AREA ADJACENCIES AND OVERLAPS

There is no overlap in the service areas served by GST and the service areas served by the TDS New Hampshire Companies. The Applicants note that there are several adjacencies between

GST and the TDS New Hampshire Companies, specifically between certain GST exchanges and the exchanges served by MCTC, as follows:

<u>GST Exchange</u>	<u>Shares Boundary with MCTC Exchange(s)</u>
Washington	Bradford
Hillsboro Upper Village	Hillsborough, Antrim
Weare	Hillsborough, Henniker, Contoocook

The Applicants believe that these adjacencies offer opportunities for efficiencies in the affected exchanges and will further the public interest of the Transaction.⁶ A map from the New Hampshire Department of Energy showing the services areas for New Hampshire's ILECs, including GST and the TDS New Hampshire Companies, is attached hereto as **Exhibit A**.⁷

D. UNIVERSAL SERVICE FUND INFORMATION

Consistent with the Wireline Competition Bureau's Public Notice dated April 19, 2022,⁸ the Applicants provide the following information regarding the USF support received by the Transferor's Licensee and the Transferee's affiliates.

⁶ *Joint Applications of Global Crossing Ltd. And Citizens Communications Company for Authority to Transfer Control of Corporations Holding Commission Licenses and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 20,22 63, 78, 90, and 101 of the Commission's Rules*, Files Nos. ITC/T-C-20000828-00530, CCBPol No. 00-1 20011005AD-09 0000209675 et al., Memorandum Opinion and Order, 16 FCC Rcd 8507, 8510-11, paras. 7-9 (CVCB, IB, CSB, WTB 2001) (granting transfer of control involving ILECs with adjacent exchanges where merger would provide service efficiencies); *Application of Level 3 Communications, Inc. and CenturyLink for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 32 FCC Rcd 9581, 9606, para. 54 (2017) (finding that transaction would advance public interest by expanding reach and service capacity of combined entity).

⁷ The New Hampshire ILEC exchange boundary map is also available on the website for the New Hampshire Department of Energy at <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/ilec-exchange-boundaries-map.pdf>.

⁸ Public Notice, *Wireline Competition Bureau Lists Best Practices for Addressing Universal Service Fund Information in Section 214 Transfer of Control Applications*, 37 FCC Rcd 5190 (Wireline Competition Bureau, Apr. 19, 2022).

1. Transferor's Licensee: GST

Table 1 below summarizes the USF support received by Transferor's affiliate GST in New Hampshire.

Table 1.

Licensee Name	USF Programs	ETC Status	Study Area Code
Granite State Telephone, Inc	E-ACAM, CAF-ICC	Yes	120039

As noted, GST is a designated ETC that receives USF high-cost support in the form of E-ACAM and CAF-ICC. GST also participates in the Lifeline program. GST will continue to receive USF support and will continue to participate in the Lifeline program after consummation of the Transaction. Neither Transferor nor its New Hampshire licensee, GST, has acquired any public grant funds (from a local, state, or federal source) to deploy at least 100/20 Mbps service in Study Area 120039.

2. Transferee's Affiliates: The TDS New Hampshire Companies

Table 2 below summarizes the USF support received by the five entities operating in New Hampshire as the TDS New Hampshire Companies.

Table 2.

Affiliate Name	USF Programs	ETC Status	Study Area Code
Hollis Telephone Company	E-ACAM, CAF-ICC	Yes	123321
Kearsarge Telephone Company	E-ACAM, CAF-ICC	Yes	120045
Merrimack County Telephone Company	E-ACAM, CAF-ICC	Yes	120047
Union Telephone Company	E-ACAM, CAF-ICC	Yes	120049
Wilton Telephone Company	E-ACAM, CAF-ICC	Yes	120050

As previously noted, each of the TDS New Hampshire Companies is a designated ETC in its rural study area and receives USF high-cost support in the form of E-ACAM and CAF-ICC. Transferee's affiliates also participate in the Lifeline program. The TDS New Hampshire Companies will continue to receive USF support and to participate in the Lifeline program following consummation of the Transaction. Neither Transferee nor any of its New Hampshire affiliates has acquired any public grants funds (from a local state, or federal source) to deploy at least 100/20 Mbps service in Study Area 120039, which is now served by GST.

3. Post-Transaction Status of Universal Service Fund Support

Other than the departures of the owners of Yankee Telecom from the senior management of Yankee Telecom and the Licensees, the Transaction will not result in any changes to the management, technology, or debt of the Applicants or Licensees, nor will it result in any changes that would compromise their ability to meet their USF high-cost service obligations. TDS Telecom has no financial considerations that would impact its ability to meet its newly acquired or pre-existing E-ACAM obligations. After consummation of the Transaction, the Applicants will continue to be obligated to meet all FCC, ETC, and state requirements, as well as federal obligations, including but not limited to those associated with E-ACAM support. GST will continue to meet its USF obligations, and TDS Telecom affirms that it will assume responsibility for GST's obligations post-Transaction.

The Applicants agree that, following consummation of the Transaction, TDS Telecom will be responsible for complying with the USF requirements and the Commission's rules, regardless of any pre-existing or reasonably foreseeable conditions that could affect GST's ability to meet its USF-related obligations, including, without limitation, technical, marketplace, and operational conditions. TDS Telecom will, consistent with the continuation of post-

Transaction USF support to GST, assume all risks and consequences of non-compliance with program requirements, including default recovery of support and potential forfeiture penalties, in all supported areas, regardless of whether such non-compliance predates or postdates the consummation of the Transaction. Study Area Code 120039 will continue to be associated with GST following consummation of the Transaction. GST will also continue to participate in the Lifeline program in New Hampshire.

II. DESCRIPTION OF THE TRANSACTION

On April 17, 2026, Yankee Telecom, Inc., and its controlling shareholders (collectively, the “Selling Parties”) and TDS Telecom entered into a Stock Purchase Agreement (the “Agreement”) under which TDS Telecom will acquire all of the outstanding equity interests in Yankee Telecom and, therefore, indirect ownership and control of its subsidiaries, GST and GSLD. As a result of the proposed Transaction, TDS Telecom will assume control of Yankee Telecom and the Licensees, including all licenses, physical plant, and operations in the State of New Hampshire. GST and GSLD will retain their names until fully transitioned into TDS Telecom. Following consummation of the Transaction, GST and GSLD will continue to exist, but as wholly owned subsidiaries of TDS Telecom, and will continue to operate pursuant to their respective Section 214 authorizations. The Licensees will continue to operate post-closing under the same current rates, terms, and conditions of service using the same facilities. Other than Yankee Telecom’s and the Licensees’ senior management (who are the current owners of Yankee Telecom and will be exiting as part of the Transaction), the Licensees will continue to be operated by certain key employees of GST and GSLD, with the additional management experience of TDS Telecom’s management team.

The Application seeks consent for the transfer of control of GST and GSLD from Yankee Telecom to TDS Telecom, in accordance with the Agreement. The Transaction is expected to be consummated in the second half of 2026, contingent upon receipt of required regulatory approvals and the satisfaction or waiver of other customary closing conditions set forth in the Agreement.

Organizational charts showing the pre- and post-closing ownership of Licensees are attached hereto as **Exhibit B**.

III. PUBLIC INTEREST STATEMENT

The Transaction will serve the public interest, convenience, and necessity. TDS Telecom is an established, professionally managed, and financially secure telephone and broadband company that has long owned and operated ILEC subsidiaries and affiliates in rural portions of New Hampshire, as well as in many other states. TDS Telecom has a proven track record of investing in rural networks and communities and of providing high quality telecommunications and related services to residential and business customers in rural areas. TDS Telecom plans to invest in the territories served by the Licensees and to enhance and expand the services currently being offered. Accordingly, the Transaction will benefit the residents of New Hampshire who will have access to expanded high-quality communications offerings that are provided by a company controlled and managed by individuals with extensive knowledge of local telephone operations and the communications needs of the communities served.

Grant of this Application will not reduce competition in the relevant markets, as it will result only in a change in control of GST and GSLD. The operations and networks of the Licensees and TDS Telecom are complementary and adjacent and do not overlap. The

Transaction will not remove any actual or potential competitors from the market, nor will it have an adverse effect on the ability of other providers to enter and/or to compete in the market.

The Transaction will also not have an adverse effect on the Universal Service Fund and its various funding mechanisms. GST is an Enhanced A-CAM carrier and also receives CAF-ICC support. TDS Telecom, for its part, already owns and controls other carriers that receive Enhanced A-CAM and CAF-ICC support, including the five TDS Telecom New Hampshire Companies that operate either adjacent to or in relative close proximity to GST and GSLD.

For all of these reasons, the Commission should grant the Application and find that the Transaction serves the public interest, convenience, and necessity.

IV. INFORMATION REQUIRED BY COMMISSION RULES

The Applicants submit the following information pursuant to 47 C.F.R. §§ 63.04, 63.18, 63.24, and Commission regulations, in support of their request for consent for the transfer of control of Licensees to TDS Telecom.

(a) Name, address and telephone number of each Applicant (Section 63.18(a)):

Transferor

Yankee Telecom, Inc. (FRN 0003666708)
600 S. Stark Highway
Weare, NH 03281
Telephone: (603) 529-9911
Email: chrisrand@gsc.tech.com

Licensees

Granite State Telephone, Inc. (FRN 0003666708)
600 S. Stark Highway
Weare, NH 03281
Telephone: (603) 529-9911
Email: chrisrand@gsc.tech.com

Granite State Long Distance, Inc. (FRN 0004317319)
600 S. Stark Highway
Weare, NH 03281
Telephone: (603) 529-9911
Email: chrisrand@gsc.tech.com

Transferee

TDS Telecommunications LLC (FRN 0004948105)
525 Junction Road
Madison, WI 53717
Telephone: (608) 664-4000
Email: andrew.petersen@tdstelecom.com

(b) Jurisdiction under which Applicants are organized (Section 63.18(b))

Yankee Telecom is a New Hampshire corporation. Its affiliated Licensees, GST and GSLD, are both New Hampshire corporations. TDS Telecom is a Delaware limited liability company.

**(c) Correspondence concerning this Application should be addressed to
(Answer to Question 10 – Section 63.18(c))**

Transferor/Licensees

Yankee Telecom, Inc.
600 S. Stark Highway
Weare, NH 03281
Attention: Christian H. Rand
Telephone: (603) 529-9911
Email: chrisrand@gsc.tech.com

With copies to:

Todd Slamowitz, Esq.
Lukas LaFuria Lantor & Sachs, LLP
8350 Broad Street, Suite 1450
Tysons, Virginia 22102
Telephone: (703) 584-8673
Email: tslamowitz@fcclaw.com

Transferee

TDS Telecommunications LLC
525 Junction Road
Madison, WI 53717
Attention: Andrew Petersen
Telephone: (608) 664-4000
Email: andrew.petersen@tdstelecom.com

With copies to:

Paul J. Phillips, Esq.
Primmer Piper Eggleston & Cramer PC
900 Elm Street, 19th Floor
Manchester, NH 03101
Telephone: (603) 626-3300
Email: pphillips@primmer.com

(d) Existing Section 214 authority (Answer to Question 10 – Section 63.18(d))

Transferor: Yankee Telecom does not provide telecommunications services and does not hold Section 214 authorizations.

Licensees. (1) GSLD holds a blanket Domestic Section 214 authorization to provide domestic interstate telecommunications services in its service territory and an international Section 214 authorization to provide global resale telecommunications services between the United States and international points (File No. ITC 96-019).

(2) GST holds a blanket Domestic Section 214 authorization to provide domestic interstate telecommunications services in its service territory.

Transferee. TDS Telecom does not directly provide telecommunications services and does not hold Section 214 authorizations.

(h) Name, address, citizenship, and principal business owners with 10% or greater direct or indirect ownership interest (Answer to Question 11 – Section 63.18(h))

Transferor

Yankee Telecom, Inc., is a corporation formed under the laws of the State of New Hampshire. Yankee Telecom is a holding company that does not provide telecommunications services. Yankee Telecom owns 100% of the stock of GSLD and 100% of the stock of GST. Its address is 600 S. Stark Highway, Weare, New Hampshire 03281.

Yankee Telecom is owned in equal one-third (33⅓%) interests by three irrevocable trusts: the Susan R. King Irrevocable Trust of 2000; the Christian H. Rand Irrevocable Trust of 2000 and the Catherine R. Gherardi Irrevocable Trust of 2000. The addresses of the three irrevocable trusts are the same as Yankee Telecom: 600 S. Stark Highway, Weare, New Hampshire 03281.

Transferee

TDS Telecom is a wholly owned subsidiary of Telephone and Data Systems, Inc. “TDS”), a corporation formed under the laws of the State of Delaware. TDS is a publicly traded company, listed on the New York Stock Exchange (Symbol: TDS). A diversified telecommunications

service company, TDS provides wireline and wireless telecommunications services in the United States. Its address is 30 N. LaSalle Street, Chicago, Illinois 60602.

TDS is controlled by a voting trust (the “Voting Trust”) whose trustees are: Anthony J.M. Carlson, Walter D.C. Carlson, Prudence E. Carlson, and Dr. Letitia G.C. Carlson, all of whom are United States citizens. The address of the trust is 30 N. LaSalle Street, Suite 4000, Chicago, Illinois 60602. Walter D.C. Carlson is the President and Chief Executive Officer of TDS. As of April 8, 2026, the Voting Trust controls 56.8% of the voting power of TDS’s total shares that vote in matters other than the election of directors, and 95.6% of the Series A Common Shares, which elect eight (8) of TDS’s twelve (12) directors. Accordingly, the Voting Trust elects a majority of the directors and directs a majority of the combined voting power of TDS in matters other than the election of directors.

TDS Telecom is affiliated with the following companies that provide local exchange and domestic interexchange services in the State of New Hampshire:

- Hollis Telephone Company, a New Hampshire corporation, is 100% owned by TDS Telecom. HTC is an ILEC providing local exchange telephone service in SAC 123321.
- Kearsarge Telephone Company, a New Hampshire corporation, is 100% owned by TDS Telecom. KTC is an ILEC providing local exchange telephone service in SAC 120045.
- Merrimack County Telephone Company, a New Hampshire corporation, is 100% owned by TDS Telecom. MCTC is an ILEC providing local exchange telephone service in SAC 120047.
- Union Telephone Company, a New Hampshire corporation, is 100% owned by TDS Telecom. UTC is an ILEC providing local exchange telephone service in SAC 120049.
- Wilton Telephone Company, a New Hampshire corporation, is 100% owned by TDS Telecom. WTC is an ILEC providing local exchange telephone service in SAC 120050.

(i) Foreign carrier certification (Answer to Questions 14-17)

Neither Applicants nor any of their affiliates are not themselves foreign carriers and have no affiliations with foreign carriers, and they will continue to have no such affiliations following the consummation of the proposed Transaction. Accordingly, Applicants qualify for a presumption of non-dominance under Section 63.10 of the Commission's rules on all U.S. international routes.⁹

(j) Domestic country certification

TDS Telecom, as the Transferee, certifies that it does not seek to provide international telecommunications services to any destination country where: (i) Transferee is a foreign carrier; (ii) any entity that controls Transferee or that owns more than 25 percent of Transferee controls a foreign carrier in such country; and (iii) two or more foreign carriers (or entities that control foreign carriers) own, in the aggregate, more than 25 percent of Transferee and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Demonstration regarding market power for countries that are not WTO members

Not applicable.

(l) [This requirement has been deleted from the Commission's rules.]

(m) Regulation as a non-dominant provider

Not applicable.

(n) Special concessions from foreign carriers

Each of the Applicants certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where

⁹ 47 C.F.R. § 63.10(a)(1).

the foreign carrier possesses market power on the foreign end of the route and further certifies that it will not enter into any such agreements in the future.

(o) Certification regarding Section 5301 of the Anti-Drug Abuse Act of 1988

The Applicants, pursuant to Sections 1.2001-1.2003 of the Commission's rules, hereby certify, as evidenced by the attached Certifications, that to the best of their knowledge no party to the Application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988 (21 U.S.C. § 853).

(p) Description of Geographic Areas and Services

A description of the geographic areas and services of the Applicants and their affiliates is set forth in Section I above.

(q) Streamlined Processing (Sections 63.03 & 63.12)

The Application qualifies for streamlined processing pursuant to Sections 63.03 and 63.12 of the Commission's Rules.¹⁰ Specifically, the Licensees of the Applicants are independent incumbent local exchange carriers (as defined in 47 C.F.R. § 64.1902) that have, in combination, fewer than two percent (2%) of the nation's subscriber lines installed in the aggregate nationwide, that have immaterial adjacent telecommunications service areas, and that, upon the consummation of the Transaction, will have a less than ten percent (10%) share of the interstate interexchange market.

In addition, neither the Applicants nor any of their affiliates are foreign carriers, and they will continue have no such affiliates following the consummation of the Transaction. The Applicants therefore qualify for a presumption of non-dominance under Section 63.10 of the Commission's rules on all U.S.-international routes.

¹⁰ 47 C.F.R. §§ 63.03(b)(2)(iii) & 63.12(a)-(b).

If, however, the Application is given streamlined processing, the Applicants nevertheless request that the Application be granted as expeditiously as possible.

V. INFORMATION REQUIRED BY SECTION 63.04 OF THE COMMISSION'S RULES

Pursuant to 63.04(b) of the Commission's rules for joint domestic/international Section 214 applications, the Applicants provide the information described in Section 63.04(a)(6) through 63.04(a)(12), inclusive.

(6) Description of the Transaction (Section 63.04(a)(6))

The proposed Transaction is described in Section II above.

(7) Description of the geographic areas in which the Transferor and Transferee (and their affiliates) offer domestic telecommunications services, and the services provided in each area (Section 63.04(a)(7))

The respective services and service areas of the Applicants are described in Section I, above.

(8) Statement as to how the Application qualifies for streamlined treatment (Section 63.04(a)(8))

The Applicants' statement regarding the Application's qualification for streamlined treatment is set forth in Section IV(q), above.

(9) Other Commission applications related to the proposed Transaction (Section 63.04(a)(9))

A related application to transfer three (3) radio station licenses from GST to TDS Telecom (File No. 0012011334) is presently pending before the Wireless Telecommunications Bureau.

(10) Statement regarding imminent business failure (Section 63.04(a)(10))

Neither Applicant nor any of its affiliates is facing imminent business failure, and the Applicants are not requesting special consideration.

(11) Separately filed waiver requests (Section 63.04(a)(11))

No separately filed waiver requested are being sought in conjunction with this Application.

(12) Public interest statement

Consummation of the proposed Transaction will serve the public interest, convenience, and necessity for the reasons detailed in Section III, above.

VI. CONCLUSION

For the foregoing reasons, Commission approval of this Section 214 Application will serve the public interest, convenience, and necessity. Accordingly, Applicants respectfully request that the Commission grant this Application forthwith.

Respectfully submitted,

Yankee Telecom, Inc.

/s/ Todd Slamowitz
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Lukas LaFuria Lantor & Sachs, LLP
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Tysons, Virginia 22102
Telephone: (703) 584-8673
Email: tslamowitz@fcclaw.com

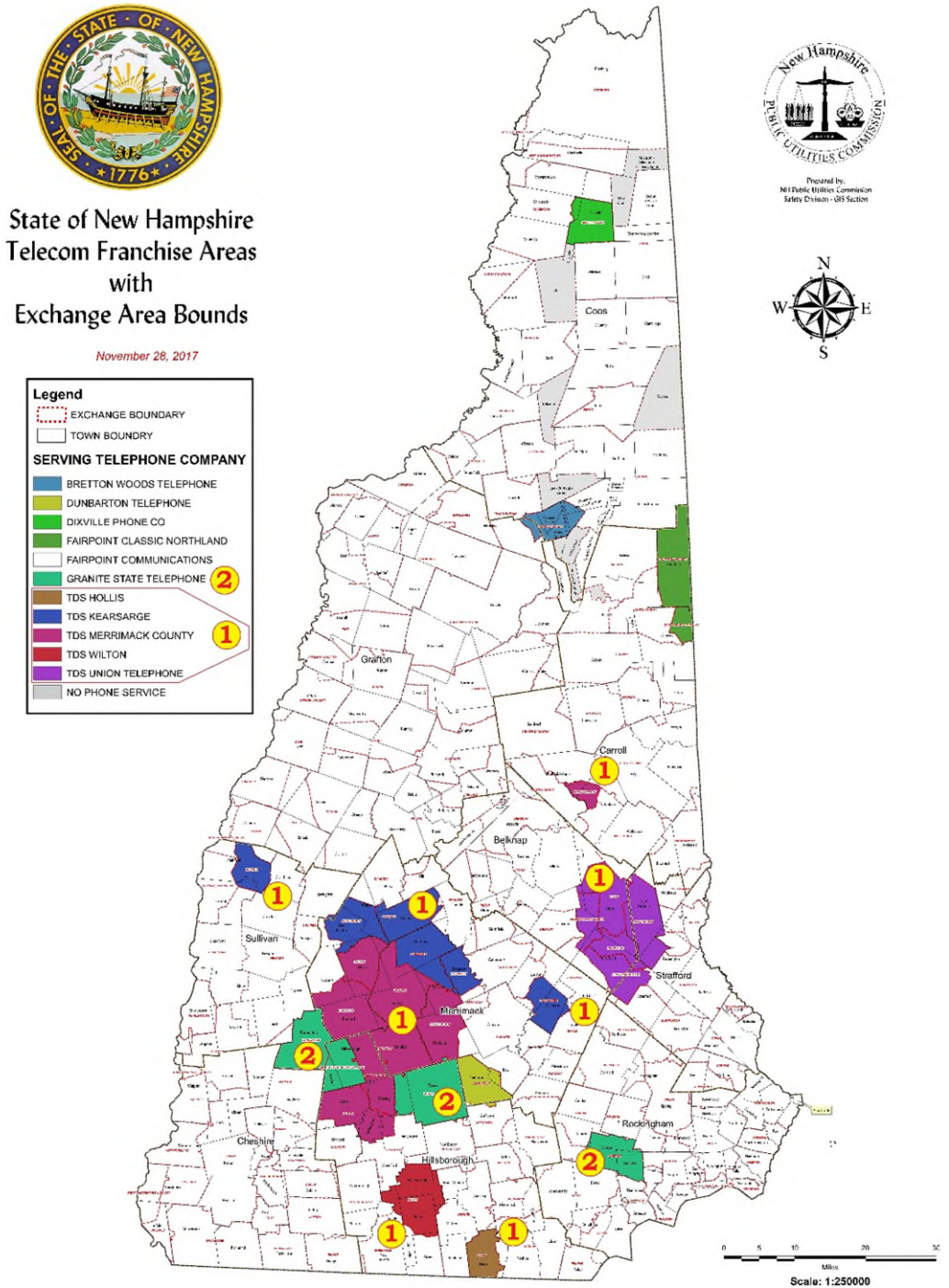
TDS Telecommunications LLC

/s/ Paul J. Phillips
Paul J. Phillips
Primmer Piper Eggleston & Cramer PC
900 Elm Street, 19th Floor
Manchester, New Hampshire 03101
Telephone: (603) 626-3300
Email: pPhillips@primmer.com

April 28, 2026

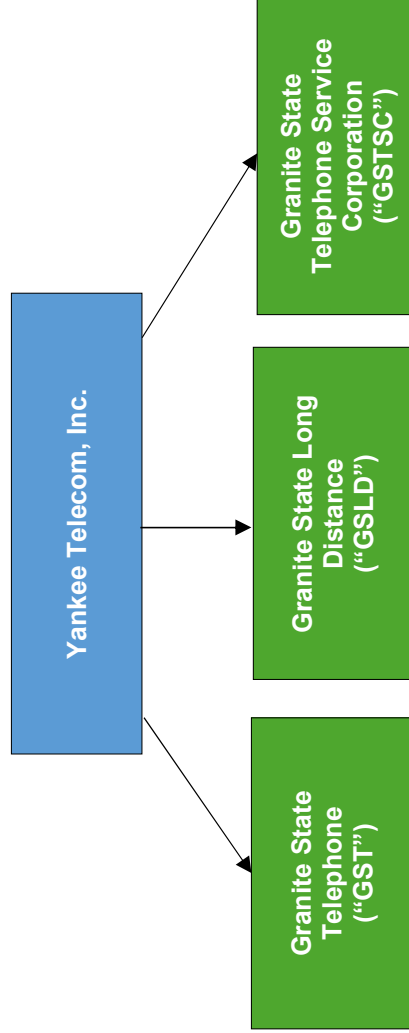
EXHIBIT A

Service Territories of Granite State Telephone, Inc. and TDS New Hampshire Companies in the State of New Hampshire



Source: New Hampshire Department of Energy: <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/ilec-exchange-boundaries-map.pdf> (edited to highlight Applicants).

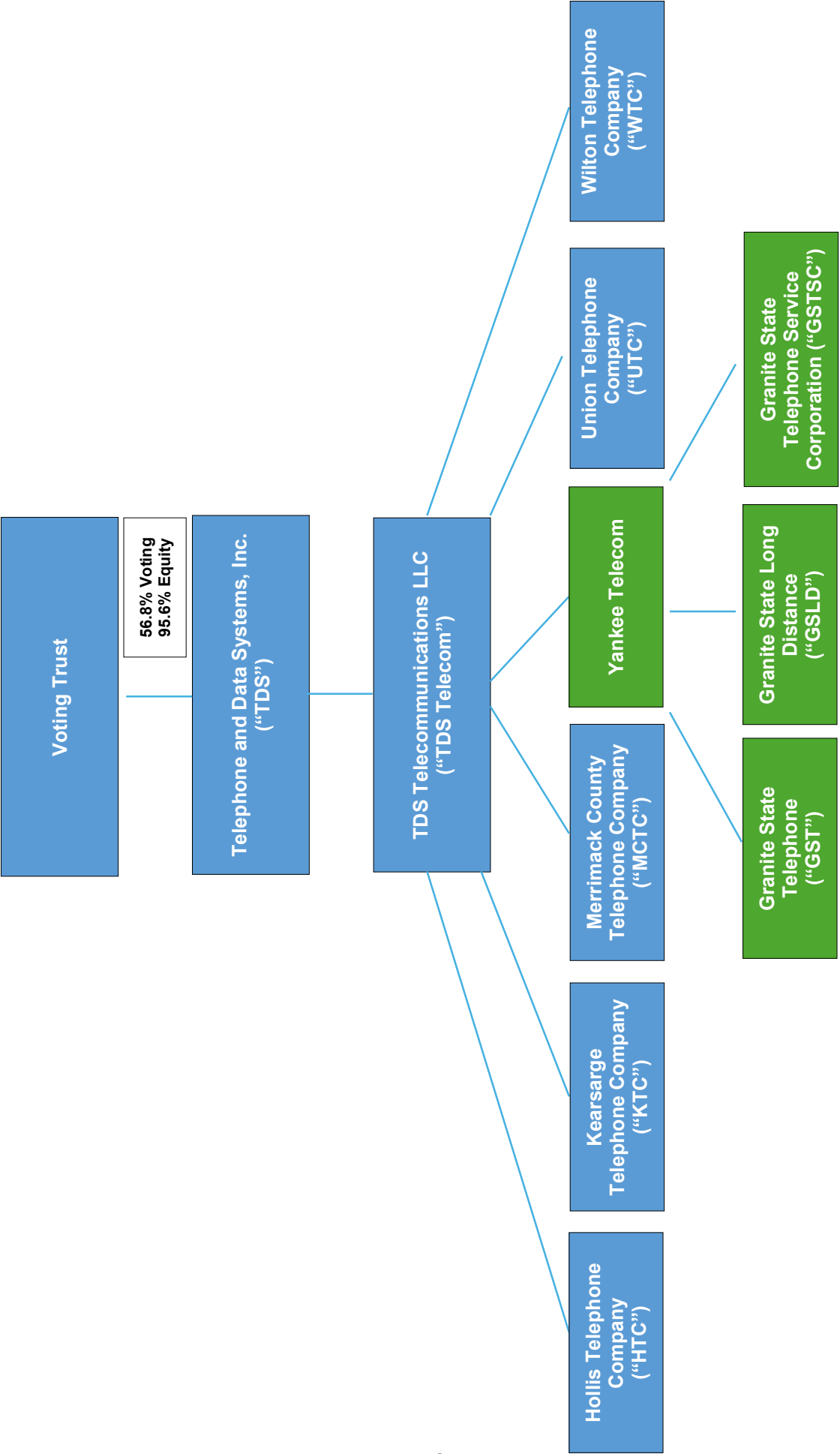
EXHIBIT B
to Joint Petition for Approval of Transfer of Control
Pre-Transaction Organizational Chart



*** Except as otherwise indicated, all ownership percentages are 100%.**

EXHIBIT B (cont.)

Post-Transaction TDS Organizational Chart



* Except as otherwise indicated, all ownership percentages are 100%.

CERTIFICATIONS

On behalf of Yankee Telecom, Inc. ("Yankee Telecom"), and its subsidiaries, Granite State Telephone, Inc. ("GST"), and Granite State Long Distance, Inc. ("GSLD"), I hereby certify that I am duly authorized to make this Certification and that all of the information contained in the Application and the accompanying Exhibits is true and accurate to the best of my knowledge and belief.

Pursuant to 47 C.F.R. § 63.18(q), I also certify that Yankee Telecom, GST, and GSLD agree as follows:

1. To comply with all applicable Communications Assistance for Law Enforcement Act ("CALEA") requirements and related rules and regulations, including any and all orders and opinions of the Federal Communications Commission ("Commission") governing the application of CALEA, pursuant to CALEA (Pub. L. No. 103-414, 108 Stat. 4279, codified at 47 U.S.C. §§ 1001-1010, as amended) and the Commission's rules and regulations as set forth in 47 C.F.R. ch. I, part 1, subpart Z.
2. To make communications to, from, or within the United States, as well as records thereof, available in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with United States law, including but not limited to:
 - a. The Wiretap Act (18 U.S.C. § 2510 *et seq.*);
 - b. The Stores Communications Act (18 U.S.C. § 2701 *et seq.*);
 - c. The Pen Register and Trap and Trace Statute (18 U.S.C. § 3121 *et seq.*; and
 - d. Other applicable court orders, subpoenas, or other legal process.
3. To designate a point of contact who is located in the United States and is a United States citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;
4. That Yankee Telecom, GST, and GSLD are responsible for the continuing accuracy and completeness of all information submitted, whether at the time of submission of the Application or subsequently in response to either the Commission or the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector's ("Committee") request, as required under Section 1.65(a) of the Commission's rules, and to inform the Commission and the Committee of any substantial and significant changes while the Application is pending;
5. That after the Application is no longer pending for purposes of Section 1.65 of the Commission's rules, Yankee Telecom, GST, and GSLD will

notify the Commission and the Committee of any changes in the authorization holder or licensee information and/or contact information promptly and, in any event, within thirty (30) days; and

6. That Yankee Telecom, GST, and GSLD understand that if they fail to fulfill any of the conditions and obligations set forth in the certification set out in Section 61.18(q) of the Commission's rules or in the grant of an application or authorization and/or if the information provided to the United States Government is materially false, fictitious, or fraudulent, it may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.

I certify under penalty of perjury that the foregoing is true and correct.

Dated:

April 29, 2026

Susan Rand King

Susan Rand King
President and Chief Executive Officer
Yankee Telecom, Inc., Granite State
Telephone, Inc., and Granite State Long
Distance, Inc.

CERTIFICATIONS

On behalf of TDS Telecommunications LLC (“TDS Telecom”), I hereby certify that I am duly authorized to make this Certification and that all of the information contained in the Application and the accompanying Exhibits is true and accurate to the best of my knowledge and belief.

Pursuant to 47 C.F.R. § 63.18(q), I also certify that TDS Telecom agrees as follows:

1. To comply with all applicable Communications Assistance for Law Enforcement Act (“CALEA”) requirements and related rules and regulations, including any and all orders and opinions of the Federal Communications Commission (“Commission”) governing the application of CALEA, pursuant to CALEA (Pub. L. No. 103-414, 108 Stat. 4279, codified at 47 U.S.C. §§ 1001–1010, as amended) and the Commission’s rules and regulations as set forth in 47 C.F.R. ch. I, part 1, subpart Z.
2. To make communications to, from, or within the United States, as well as records thereof, available in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with United States law, including but not limited to:
 - a. The Wiretap Act (18 U.S.C. § 2510 *et seq.*);
 - b. The Stores Communications Act (18 U.S.C. § 2701 *et seq.*);
 - c. The Pen Register and Trap and Trace Statute (18 U.S.C. § 3121 *et seq.*; and
 - d. Other applicable court orders, subpoenas, or other legal process.
3. To designate a point of contact who is located in the United States and is a United States citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;
4. That TDS Telecom is responsible for the continuing accuracy and completeness of all information submitted, whether at the time of submission of the Application or subsequently in response to either the Commission or the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector’s (“Committee”) request, as required under Section 1.65(a) of the Commission’s rules, and to inform the Commission and the Committee of any substantial and significant changes while the Application is pending;
5. That after the Application is no longer pending for purposes of Section 1.65 of the Commission’s rules, TDS Telecom will notify the Commission and the Committee of any changes in the authorization holder or licensee

information and/or contact information promptly and, in any event, within thirty (30) days; and

6. That TDS Telecom understands that if it fails to fulfill any of the conditions and obligations set forth in the certification set out in Section 61.18(q) of the Commission's rules or in the grant of an application or authorization and/or if the information provided to the United States Government is materially false, fictitious, or fraudulent, it may be subject to all remedies available to the United States Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2026

/s/ Andrew S. Petersen
Andrew S. Petersen
Senior Vice President of Corporate Affairs
TDS Telecommunications LLC