

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Joint Application of)	
)	
Chad Miles)	
<i>Transferor</i>)	
)	
and)	WC Docket No. 20-_____
)	
Great Plains Communications LLC)	IB File No. ITC-T/C_____
<i>Transferee</i>)	
)	
For Grant of Authority Pursuant to Section 214)	
of the Communications Act of 1934, as Amended, and)	
Section 63.04 of the Commission’s Rules)	
to Complete a Transfer of Control)	
)	
)	

JOINT DOMESTIC AND INTERNATIONAL APPLICATION

Chad Miles (“Transferor”) and Great Plains Communications LLC (“GP Communications” or “Transferee”) (and jointly, “Applicants”) hereby respectfully request authorization, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (the “Act”), and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.24(e), to transfer control of Miles Enterprises, Inc. (“Miles Enterprises”) and its regulated subsidiaries: Miles Communications, Inc. (“Miles Communications”), Sunman Telecommunications Corporation (“Sunman Telecommunications”), and Sunman Telecommunications Corporation Long Distance

(“Sunman Telecommunications LD”) (collectively, Miles Communications, Sunman Telecommunications, and Sunman Telecommunications LD are referred to as the “Licensees”) to GP Communications.¹

Each of Miles Communications, Sunman Telecommunications, and Sunman Telecommunications LD holds a blanket domestic Section 214 authorization. Sunman Telecommunications LD also holds an international Section 214 authorization for “authority to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules,” *i.e.* Global Resale Authority, granted by the Commission under File No. ITC-214-19980605-00382. Applicants are filing contemporaneously with the Wireless Telecommunications Bureau a Form 603 application seeking consent for the transfer of control of the 700 MHz license with call sign WQIZ580 held by Miles Communications.

As discussed in more detail below, the Applicants have entered into an agreement whereby GP Communications will acquire full ownership interest in Miles Enterprises and Miles Enterprises’ subsidiaries, the Licensees. The transaction will not result in any loss or impairment of service for any of the Licensees’ customers, and will have no adverse effects upon competition in Indiana or the rest of the United States. The proposed transaction will transfer control of the Licensees to GP Communications, a company with extensive experience and expertise in the provision of telecommunications services. The transaction will create operational efficiencies, will benefit customers by providing additional advanced services and support, and will not result in

¹ As part of the transaction, each of Miles Enterprises, Miles Communications, Sunman Telecommunications, and Sunman Telecommunications LD will convert from a corporation to a limited liability company prior to closing. As a result, references herein to Miles Communications, Sunman Telecommunications, and Sunman Telecommunications LD should be construed as references to these entities as limited liability companies upon completion of the transaction. Licensees will submit the appropriate *pro forma* notification in connection with the conversions following their completion.

any harms to existing customers, so the Commission should find that the transaction will serve the public interest.

Pursuant to Section 63.04(b) of the Commission's Rules, 47 C.F.R. § 63.04(b), the Applicants are filing a combined domestic and international application for the proposed transfer of control of the Licensees. The Applicants provide below the information required by Sections 63.24(e)(2) and 63.04(a)(6) through (a)(12) of the Commission's Rules, 47 C.F.R. §§ 63.24(e)(2), 63.04(a)(6-12).

I. DESCRIPTION OF THE APPLICANTS

A. Chad Miles, Miles Enterprises, Miles Communications, Sunman Telecommunications, and Sunman Telecommunications LD

Miles Enterprises, Inc. and its wholly owned subsidiaries Sunman Telecommunications, Miles Communications, and Sunman Telecommunications LD are Sub-Chapter S-Corporations organized under the laws of Indiana. Their principal place of business is located at 123 Nieman St., Sunman, IN. Together, Sunman Telecommunications, Miles Communications, and Sunman Telecommunications LD provide 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 serves as an incumbent local exchange carrier in southeast Indiana; Miles Communications provides facilities-based competitive local exchange services in southeast Indiana; and Sunman Telecommunications LD provides competitive resold long-distance services in Indiana. Together, Sunman Telecommunications and Miles Communications serve 10 counties in Southeastern Indiana with its nearly 700-mile fiber network. Each of Sunman Telecommunications, Miles Communications, and Sunman Telecommunications LD holds a blanket domestic Section 214 authorization pursuant to 47 C.F.R. § 63.01, and Sunman

Telecommunications LD holds an international Section 214 authorization to provide resold international telecommunications services.

Chad Miles is an individual residing in the state of Indiana at 200 White Oak Drive, Batesville, IN 47006. Chad Miles is sole shareholder of Miles Enterprises, Inc, owning 100% of the outstanding common stock.

B. GP Communications

GP Communications and its wholly owned subsidiaries Great Plains Broadband LLC (“GP Broadband”), and Great Plains Communications Long Distance LLC (“GP Long Distance”) are limited liability companies organized under the laws of Delaware. Their principal place of business is located at 1600 Great Plains Centre, P.O. Box 500, Blair, NE 68008. GP Communications is the largest privately owned telecommunications provider in Nebraska serving over 92 communities with its extensive 11,500-mile regional fiber network (including mileage from ICN, which is discussed below). Together, GP Communications, GP Broadband, and GP Long Distance provide 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. GP Communications serves as an incumbent local exchange carrier in Nebraska and in a few areas of Colorado, Kansas, and South Dakota; GP Broadband provides facilities-based competitive local exchange services in Nebraska; and GP Long Distance provides competitive resold long distance services in Nebraska. Each of GP Communications, GP Broadband, and GP Long Distance holds a blanket domestic Section 214 authorization pursuant to 47 C.F.R. § 63.01, and GP Long Distance holds an international Section 214 authorization to provide resold international telecommunications services.

GP Communications' subsidiary InterCarrier Networks, LLC ("ICN") is a limited liability company organized under the laws of Michigan. The principal place of business is located at 1600 Great Plains Centre, P.O. Box 500, Blair, NE 68008. ICN's mission is to provide critical bandwidth infrastructure solutions to telecommunications carriers and major enterprises. ICN provides domestic IP enabled services, broadband services, and advanced services. ICN also provides local exchange and exchange access services in the states of Illinois and Indiana. In addition, ICN has received authority to operate in the state of Kentucky but currently only provides dark fiber to a small number of wireless sites. ICN holds a blanket domestic Section 214 authorization pursuant to 47 C.F.R. § 63.01.

II. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of a Membership Interest Purchase Agreement ("Agreement") dated June 5, 2020, GP Communications will acquire control of Miles Enterprises and Miles Enterprises' subsidiaries, including the Licensees. Prior to closing, Chad Miles will contribute all of his outstanding equity interests to Miles Capital, Inc., a newly formed entity created for the purposes of consummating this transaction, and this entity will be wholly owned by Chad Miles, the current sole owner of Miles Enterprises, resulting in a temporary *pro forma* transfer of control of the Licensees to Miles Capital, Inc. This interim step completed immediately prior to closing will facilitate the transfer of control of Miles Enterprises and its subsidiaries, including Licensees, from Chad Miles to GP Communications.

After consummation of the transaction, the Licensees will continue to exist and operate under the same names, and will continue to provide service pursuant to then-existing rates, terms, and conditions for the near term. Any future changes to the rates, terms, and conditions of service will be undertaken pursuant to customers' contracts, tariffs, and applicable law. No carrier change

charges will result from the transaction, and no customer service or billing contact information will change as a result of the transaction.

The transaction will be transparent to the customers of the Licensees, which customers will continue to be served pursuant to the Licensees' existing authorizations and existing terms and conditions. Additionally, after the close of the transaction, certain key personnel of the Licensees will continue to work with the Licensees, which will also facilitate the transition to the new ownership structure.

A diagram of the pre- and post-closing corporate structure of the Applicants is provided hereto as **Exhibit A**.

III. PUBLIC INTEREST STATEMENT

Pursuant to Section 214 of the Act, the Commission will approve a proposed transfer of control of an authorization if it concludes that, after considering the record before it, doing so would serve the public interest, convenience, and necessity.² The Commission will inquire whether the proposed transaction complies with relevant provisions of the Act, other applicable statutes, and the Commission's Rules, including whether the proposed transferee is qualified to hold the authorizations.

Consistent with the Commission's rules and precedents, the Applicants respectfully submit that the Commission should find that the proposed transaction is in the public interest and approve this Application. GP Communications has the requisite industry experience and financial wherewithal to become the new owner of the Licensees. The Applicants intend to maintain the Licensees' excellent managerial, technical, and operational standards, and enhance them as a result of

² 47 U.S.C. § 214. *See, e.g., Applications of Level 3 Communications, Inc. and CenturyLink, Inc.*, Memorandum Opinion and Order, WC Docket No. 16-403, FCC 17-142, paras. 8-11 (rel. Oct. 30, 2017) (describing the Commission's standard of review for proposed transfers of control).

the transaction. The transaction will create operational efficiencies, will not result in any harms to customers, and will enable increased investment and competition for telecommunications and cable services in Indiana. The transaction poses no threat to competition in Indiana. There is no physical overlap between the service areas of GP Communications/ ICN and the Licensees. The nearest fiber is separated by approximately 30-40 miles, and the GP Communications/ ICN network only serves tower and wholesale customers off these fibers, and does not provide any residential or enterprise/commercial services. There will be no reduction in competitors, and there will be no negative impact on competition in the communications market in Indiana or elsewhere in the United States.

Since GP Communications has elected to receive USF support under the Alternative Connect America Cost Model (“A-CAM”)³, and Sunman Telecommunications receives cost-based support, the Applicants anticipate that approval of the transaction will be subject to the conditions adopted in the *Hargray/ComSouth Order*.⁴ We therefore expect that Sunman Telecommunications’ operating expense would be capped at the average operating expense of the three calendar years preceding the transaction closing date for which the operating expense data are available, and that the cap shall remain in effect for seven years from the consummation of the transaction.⁵ We understand that this cap will apply to cost recovery under both HCLS and CAF-BLS. With the imposition of the *Hargray/ComSouth* condition, there is no potential for harm to the public interest stemming from grant of the Application.

³ No entities under common-ownership with GP Communications receive cost-based support.

⁴ *Joint Application of W. Mansfield Jennings Limited Partnership and Hargray Communications Group, Inc. for Consent to the Transfer of Control of ComSouth Corporation Pursuant to Section 214 of the Communications Act of 1934*, WC Docket 18-52, Memorandum Opinion and Order, FCC 18-62 (rel. May 11, 2018).

⁵ *Id.* at paras. 26-29.

IV. INFORMATION REQUIRED BY COMMISSION RULE SECTION 63.04(e)

The Applicants submit the following information pursuant to Section 63.04(e) of the Commission's Rules, including the information requested in Section 63.18:

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

Transferor:

Chad Miles
123 Nieman Street
Sunman, IN 47041
Tel: (812) 623-2122

FRN: 0029658903

Licensees:

Miles Communications, Inc.
123 Nieman Street
Sunman, IN 47041
Tel: (812) 623-2122

FRN: 0002884963

Sunman Telecommunications Corporation
123 Nieman Street
Sunman, IN 47041
Tel: (812) 623-2122

FRN: 0002901833

Sunman Telecommunications Corporation Long Distance
123 Nieman Street
Sunman, IN 47041
Tel: (812) 623-2122

FRN: 0007642952

Transferee:

Great Plains Communications LLC
1600 Great Plains Centre
P.O. Box 500
Blair, NE 68008
Tel: (402) 456-6445

FRN: 0004381380

(b) Government, State, or Territory Under the Laws of Which Each Applicant is Organized.

GP Communications is a Delaware limited liability company. Chad A. Miles is a resident of the State of Indiana. Miles Enterprises and its subsidiaries are corporations organized under the laws of the State of Indiana.

(c) Correspondence concerning the Application should be sent to:

For Chad Miles and Licensees:

Michael E. Williams
Krieg DeVault LLP
One Indiana Square, Suite 2800
Indianapolis, IN 46204
Tel: (317) 238-6220
mwilliams@kdlegal.com

with a copy to:

Chad A. Miles
Chief Executive Officer
Miles Enterprises, Inc.
123 Nieman Street
Sunman, IN 47041

For GP Communications:

Matthew S. DelNero
Thomas G. Parisi
Corey J. Walker
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Tel: (202) 662-6000
mdelnero@cov.com
tparisi@cov.com
cwalker@cov.com

with a copy to:

Todd A. Foje
Chief Executive Officer
Great Plains Communications LLC
1635 Front Street
Blair, Nebraska 68008
Tel: 402-456-9511

and

Nicholas Holle
Corporate Counsel
Great Plains Communications LLC
1635 Front Street
Blair, Nebraska 68008
Tel: 402-456-6445
legal@gpcom.com

(d) Section 214 Authorizations.

Each of Miles Communications, Sunman Telecommunications, and Sunman Telecommunications LD holds a blanket domestic Section 214 authorization. Sunman Telecommunications

LD also holds an international Section 214 authorization for “authority to provide service in accordance with the provisions of Section 63.18(e)(2) of the rules.” *i.e.* Global Resale Authority.

Each of GP Communications, GP Broadband, and GP Long Distance holds a blanket domestic Section 214 authorization, and GP Long Distance also holds an international Section 214 authorization to provide resold international telecommunications services. ICN holds a blanket domestic Section 214 authorization.

(e)-(g) Not Applicable.

(h) Ownership Information.

The following persons or entities hold or will hold, directly or indirectly, a 10% or greater interest in Licensees as calculated pursuant to the Commission’s ownership attribution rules for wireline carriers:

Pre-Transaction Ownership

1. Sunman Telecommunications Corporation, Miles Communications, Inc., and Sunman Telecommunications Corporation Long Distance are wholly owned by:

Name: Miles Enterprises, Inc.
Address: 123 Nieman Street, Sunman, IN 47041
Ownership: 100%
Citizenship: United States (Indiana)
Principal Business: Holding Company

2. Miles Enterprises, Inc. is wholly owned by:

Name: Chad A. Miles
Address: 123 Nieman Street, Sunman, IN 47041
Ownership: 100%
Citizenship: United States (Indiana)
Principal Business: Owner / Operator

Post-Transaction Ownership

1. Miles Enterprises, Inc. will be wholly owned by:

Name: Great Plains Communications LLC

Address: (“GP Communications”)
1600 Great Plains Centre, P.O. Box 500, Blair, NE 68008
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Telecommunications services

2. GP Communications is wholly owned by:

Name: Great Plains Communications Holdings LLC
 (“GPC Holdings”)
Address: 1900 K Street NW, Suite 650 Washington, DC 20006
Ownership: 100%
Citizenship: United States (Delaware)
Principal Business: Holding Company

3. GPC Holdings is 89.5% owned by:

Name: Grain Communications Opportunity Fund II, L.P.
 (“GCO Fund II”)
Address: 1900 K St. NW., Suite 650, District of Columbia, 20006
Ownership: 89.5% (directly in GPC Holdings)
Citizenship: United States (Delaware)
Principal Business: Investment Fund

Grain Management, LLC (“Grain Management”) manages and is affiliated with GCO Fund II. While Grain Management does not hold a 10% or greater equity or voting interest in GCO Fund II, the fund’s general partner, Grain GP IV, LLC, is ultimately controlled by David J. Grain, the founder and owner of Grain Management. Grain Management also manages and is affiliated with Grain Communications Opportunity Fund, L.P., which owns a controlling interest in WANRack, LLC (“WANRack”). WANRack is a competitive provider that builds private fiber networks for K-12 school districts. WANRack only offers services on a competitive basis and not as an ILEC.

GCO Fund II holds an 86.4% ownership interest in, and is the managing member of GCOF II (RC), LLC, which holds a 68.3% ownership interest in Ritter Communications Ultimate Holdings LLC, which holds a 100% ownership interest in Ritter Communications Intermediate Holdings LLC, which holds a 100% ownership interest in E. Ritter Communications Holdings LLC, which has operating subsidiaries that provide telecommunications services in Arkansas and Tennessee, and a subsidiary that is authorized to provide telecommunications services in Texas. Specifically, E. Ritter Telephone Company, LLC and Tri-County Telephone Company, LLC operate as ILECs in Arkansas; Millington Telephone Company, LLC operates as an ILEC in Tennessee; and E. Ritter Communications, LLC operates as a CLEC in Arkansas, Tennessee, and Texas.

GCO Fund II holds an 89.5% interest in, and is the managing member of GCOF II (SC), LLC, which holds a 100% ownership interest in Summit Ultimate Holdings LLC, which holds a 100% ownership interest in Summit Intermediate Holdings LLC, which holds a 100% ownership interest in Summit Vista Inc., which holds a 100% ownership interest in Summit Broadband Inc., which holds a 100% ownership interest in Orlando Telephone Company, Inc. (d/b/a Summit Broadband). Orlando Telephone Company, Inc. provides services on a CLEC basis to commercial and residential customers located in Central and Southwest Florida. Orlando Telephone does not operate as an ILEC in any location.

GCO Fund II holds a 69.91% ownership interest in Hunter Communications Holdings LLC, which holds a 100% ownership interest in Hunter Communications Intermediate Holdings LLC, which holds a 100% ownership interest in Hunter Communications and Technologies LLC. Hunter Communications and Technologies LLC provides services on a CLEC basis to commercial and residential customers located in California and Oregon, and does not provide services on an ILEC basis in any location.

4. The limited partnership interests in GCO Fund II are held by passive financial investors. The limited partnership interests are fully insulated in accordance with the Commission's Rules. Two such limited partners hold a ten percent (10%) or greater equity interest in GCO Fund II:

Name:	Board of Regents of The University of Texas System
Address:	210 W. 7th Street, Suite 1700, Austin, TX 78701
Ownership:	11.1% of the economic interests based on capital commitments (directly in GCO Fund II)
Citizenship:	United States (Texas)
Principal Business:	University Endowment

Board of Regents of The University of Texas System also holds an indirect 10.73% interest in GCOF II (RC), LLC, the interests of which are described in response to #3, above.

Name:	The New York State Common Retirement Fund
Address:	59 Maiden Lane, New York, NY 10038
Ownership:	16.7% of the economic interests based on capital commitments (directly in GCO Fund II)
Citizenship:	United States (New York)
Principal Business:	Investment Fund

No entities hold a 10% or greater interest in either Board of Regents of The University of Texas System or The New York State Common Retirement Fund, and neither of these entities is controlled by a board or general member. No other individual or entity directly or indirectly holds a ten percent (10%) or greater interest in GCO Fund II.

5. Control of GCO Fund II resides in its general partner:

Name: Grain GP IV, LLC
Address: 1900 K St. NW., Suite 650, District of Columbia, 20006
Ownership: Sole general partner of GCO Fund II
Less than 10% equity interest in GCO Fund II
Citizenship: United States (Delaware)
Principal Business: Investments

Grain GP IV, LLC is the sole member of GCOF II Co-Invest GenPar, LLC. GCOF II Co-Invest GenPar, LLC is the General Partner of GCOF II Co-Invest (RC), L.P., which holds a 17.8% interest in, and is the non-managing member of, GCOF II (RC), LLC, the interests of which are described in response to #3, above.

GCOF II Co-Invest GenPar, LLC is also the General Partner of GCOF II Co-Invest (SC), L.P., which holds an 18.7% interest in, and is the non-managing member of, GCOF II (SC), LLC, the interests of which are described in response to #3, above.

6. Grain GP IV, LLC is controlled by its sole managing member:

Name: Grain Capital II, LLC
Address: 1900 K St. NW., Suite 650, District of Columbia, 20006
Ownership: Sole managing member of Grain GP IV, LLC with 64.5% of the membership interests in GP IV, LLC
Less than 10% equity interest in GCO Fund II
Citizenship: United States (Delaware)
Principal Business: Investments

7. Grain Capital II, LLC is wholly held by:

Name: Grain Capital, LLC
Address: 1900 K St. NW., Suite 650, District of Columbia, 20006
Ownership: Sole member of Grain Capital II, LLC
Less than 10% equity interest in GCO Fund II
Citizenship: United States (Florida)
Principal Business: Investments

8. Grain Capital, LLC is wholly held by:

Name: David Grain
Address: 100 North Washington Boulevard, Suite 201, Sarasota, FL 34236
Ownership: Holds 100% of the limited liability company interest in

Grain Capital, LLC
Less than 10% equity interest in GCO Fund II
Citizenship: United States
Principal Business: Investments

No other person or entity, directly or indirectly, will control or own a ten percent or greater equity interest in Licensees upon the closing of the proposed Transaction.

Neither the Licensees nor GP Communications has any interlocking directorates with any foreign carrier.

(i) Applicants certify that they are not foreign carriers, nor are they affiliated with foreign carriers, nor will they become affiliated with foreign carriers as a result of this transaction.

(j) Applicants certify that they do not seek to provide international telecommunications services to any destination country where:

(1) An Applicant is a foreign carrier in that country; or

(2) An Applicant controls a foreign carrier in that country; or

(3) Any entity that owns more than 25 percent of Applicants, or that controls Applicants, controls a foreign carrier in that country; or

(4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate more than 25 percent of Applicants 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)-(m) Not Applicable.

(n) As evidenced by the signatures of Applicants' representatives to this Application, Applicants certify that they have not agreed to accept special concessions directly or indirectly

from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and they will not enter into such agreements in the future.

(o) As evidenced by the signatures of Applicants' representatives to this Application, Applicants certify that, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(p) Applicants are not seeking streamlined processing of this Application pursuant to Section 63.12 of the Commission's rules, but because the transaction is in the public interest and presents no harms, Applicants respectfully request prompt approval of the Application.

V. INFORMATION REQUIRED BY COMMISSION RULE SECTION 63.04(b)

The Applicants submit the following information pursuant to Section 63.04(b) of the Commission's Rules, which are the categories of information required by Sections 63.04(a)(6)-(12):

(a)(6): The proposed transaction is described in Section II of the Application above.

(a)(7): A description of the geographic service areas and services provided in each area is included in Section I of the Application above.

(a)(8): Applicants are not seeking streamlined processing of this Application, but because the transaction is in the public interest and presents no harms, Applicants respectfully request prompt approval of the Application.

(a)(9): In addition to the domestic and international Section 214 applications, the Applicants are filing contemporaneously with the Wireless Telecommunications Bureau a Form 603 application seeking consent for the transfer of control of the 700 MHz license with call sign WQIZ580 held by Miles Communications.

(a)(10): No party is requesting special consideration because it is facing imminent business failure.

(a)(11): Not applicable.

(a)(12): Consummation of the proposed transaction will serve the public interest for the reasons detailed in Section III of the Application above.

VI. CONCLUSION

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by grant of this Application.

Respectfully submitted,

**GREAT PLAINS COMMUNICATIONS
LLC**

/s/

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Thomas G. Parisi
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*Counsel for Great Plains
Communications LLC*

Dated: June 24, 2020

**CHAD A. MILES / MILES
ENTERPRISES, INC.**

/s/

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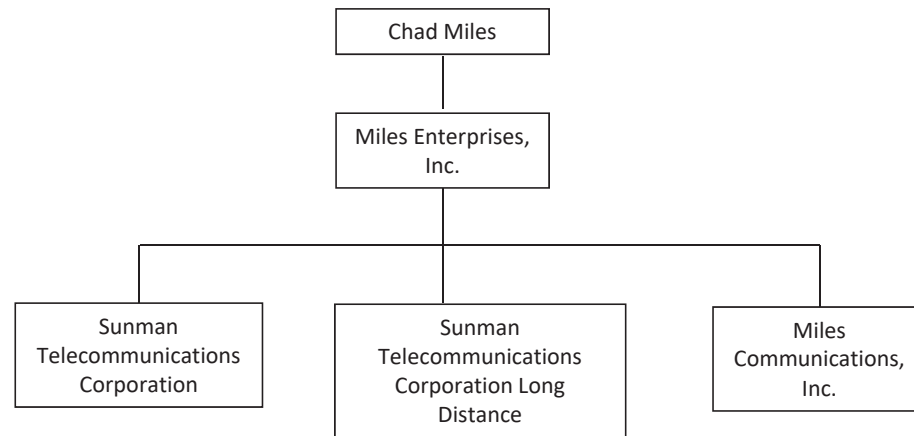
*Counsel for Chad A. Miles /
Miles Enterprises, Inc.*

LIST OF EXHIBITS

EXHIBIT A – Pre- and Post-Transaction Ownership Charts

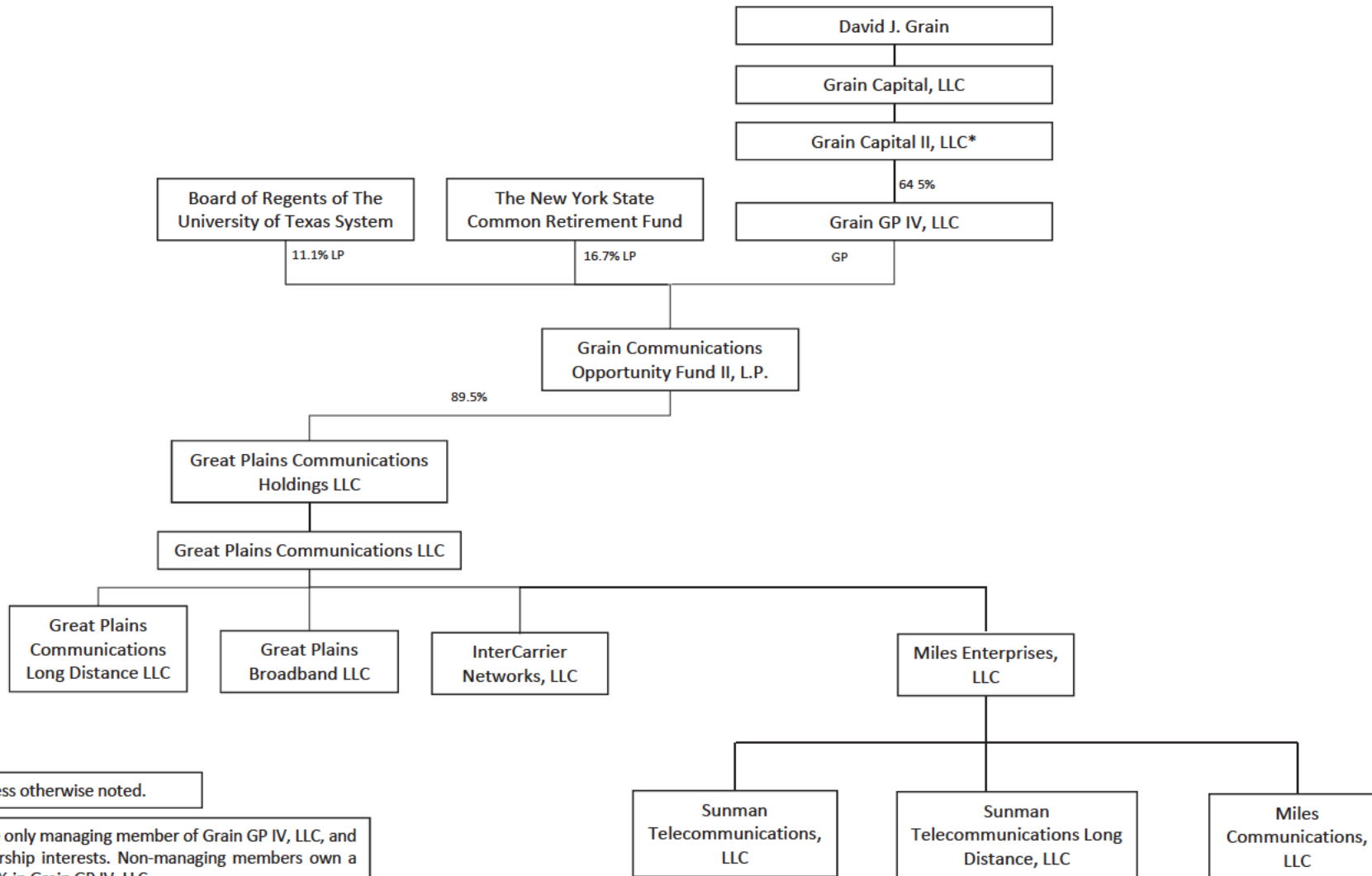
VERIFICATIONS

Pre-Transaction Ownership Chart



All ownership is 100% unless otherwise noted.

Post-Transaction Ownership Chart



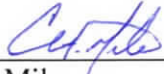
All ownership is 100% unless otherwise noted.

*Grain Capital II, LLC is the only managing member of Grain GP IV, LLC, and has 64.5% of the membership interests. Non-managing members own a combined interest of 35.5% in Grain GP IV, LLC

VERIFICATION

I, Chad A. Miles, state that I am Chief Executive Officer of Miles Enterprises, Inc., that I am authorized to make this Verification on behalf of Miles Enterprises, Inc.; that the foregoing application was prepared under my direction and supervision; and that the contents 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 this 24th Day of June, 2020



Chad A. Miles
Chief Executive Officer
Miles Enterprises, Inc.

VERIFICATION

I, Todd A. Foje, state that I am Chief Executive Officer of Great Plains Communications LLC; that I am authorized to make this Verification on behalf of Great Plains Communications LLC; that the foregoing application was prepared under my direction and supervision; and that the contents 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 this 24th Day of June, 2020



Todd A. Foje
Chief Executive Officer
Great Plains Communications LLC