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

In the Matter of the Joint Application of	)	
	)	
DigitalBridge Group, Inc., *Transferor*	)	
	)	
Zayo Group, LLC,	)	SCL-T/C-20260326-00044
Licensee	)	
	)	
and	)	
	)	
Duncan Holdco LLC, *Transferee*	)	
	)	
for Authority to Transfer Indirect Control of	)	
Cable Landing License Authorization	)	
	)	

JOINT APPLICATION

DigitalBridge Group, Inc. ("DigitalBridge" or "Transferor"); Zayo Group, LLC ("Zayo" or "Licensee") and Duncan Holdco LLC ("Duncan" or "Transferee") (collectively the "Applicants") pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (1994), Executive Order No. 10530, Exec. Ord. No. 10530 *reprinted as amended* in 3 U.S.C. § 301, and Sections 1.767 and 1.70000 *et seq.* of the Rules of the Federal Communications Commission ("Commission"), 47 C.F.R. §§ 1.767, 1.70000 *et seq.*, request approval for the transfer of indirect control of DigitalBridge's indirect interest in Zayo to Duncan. Such authority is necessary to complete a transaction (detailed below) whereby Duncan will become the indirect parent of Licensee (the "Proposed Transaction"). Zayo holds an authorization under SCL-LIC-19980123-00002, as modified in SCL-MOD-19990901-00016, to land and operate the AmeriCan-1 Cable System,[1] a private submarine fiber optic cable between the United States and Canada.[2] The transaction that is the subject of this Joint Application, as described below, results from Duncan's acquisition of a controlling interest in DigitalBridge, which will result in the indirect transfer of control of Zayo and its landing license to Duncan and its indirect parent company SoftBank Group Corp. ("SoftBank").

DigitalBridge and SoftBank expect to close the Proposed Transaction in the second half of 2026, after the satisfaction of customary closing conditions, including the receipt of required regulatory approvals, including approval of the Commission. Although the ownership of DigitalBridge will change as its shares will no longer be traded publicly on the New York Stock Exchange, the Proposed Transaction will not change the ownership interest that DigitalBridge holds in Zayo, nor will it result in any change to the Board of Managers ("Board") that oversees

[1] Zayo currently is one of four licensees for the AmeriCan-1 Cable along with Roger Communications Inc. ("Rogers"), Marine Cable Corporation, and Ledcor Industries (USA) Inc. (collectively with Zayo, the "AmeriCan-1 Licensees").

[2] The AmeriCan-1 Cable System license expired in December 2024. On May 6, 2025, Rogers, on behalf of itself and the AmeriCan-1 Licensees, filed a request for Special Temporary Authority for the continued operation of the AmeriCan-1 Cable System (SCL-LIC-19980123-00002). *See* Rogers Communications Inc., Application for Special Temporary Authority (ICFS File Nos. SCL-LIC-19980123-0002 and SCL-T/C-20050601-00013), ICFS File No. SCL-STA-20250506-00015 (filed May 6, 2025) ("AmeriCan-1 STA"). The AmeriCan-1 STA was granted on June 5, 2025, "while the Commission considers a forthcoming application for a new cable landing license for AmeriCan-1." An additional STA was granted on December 22, 2025, and expires on June 20, 2026. *See* DA No. 25-1103 (OIA Dec. 23, 2025). On December 5, 2025, the AmeriCan-1 Licensees filed an application (ICFS File No. SCL-RWL-20251203-00082) to renew and modify the submarine cable landing license for the AmeriCan-1 Cable System to authorize the continued operation of the existing submarine cable between Canada and the United States for an additional 25-year term. *See In the Matter of Rogers Communications Inc.; Marine Cable Corporation, a Wholly Owned Subsidiary of Bell Canada; Zayo Group, LLC; and Ledcor Industries (USA) Inc.'s Application for Renewal of License to Land and Operate in the United States a Fiber Optic Submarine Cable System Extending Between the United States and Canada, Known as the AmeriCan-1 System and to Assign Certain Assets of Marine Cable Corporation Ledcor Industries (USA) Inc. to Rogers Communications Inc.*, Renewal Application, ICFS File No. SCL-RWL-20251203-00082 (filed Dec. 5, 2025) ("AmeriCan-1 Renewal Application").

Zayo, over which DigitalBridge shares negative control with EQT. Zayo will continue to be operated by its dedicated management team and Board, and the Proposed Transaction is not expected to result in any changes to Zayo's assets or operations, including the services it provides over the AmeriCan-1 Cable System. Zayo will continue to hold its cable landing license following consummation of the proposed Transaction, which will be entirely transparent to customers.

I. Description of the Applicants

A. Transferor — DigitalBridge Group Inc. ("DigitalBridge")

DigitalBridge is an investment firm headquartered in Florida. Shares of common stock of DigitalBridge are currently traded on the New York Stock Exchange ("NYSE") under the ticker symbol DBRG and are widely held. DigitalBridge is an asset management firm managing investment vehicles that invest globally in digital infrastructure across five key verticals: data centers, cell towers, fiber networks, small cells, and edge infrastructure. DigitalBridge manages approximately $108 billion on behalf of its shareholders as well as the limited partners ("LPs") in its investment fund vehicles and is focused on identifying differentiated investment opportunities within digital infrastructure around the world. Each DigitalBridge investment vehicle general partner ("GP") typically holds a *de minimis* GP equity interest in the fund vehicle it manages (and thus also in the underlying portfolio companies), while exercising control over the fund and its investment decisions.

Zayo is indirectly owned by Front Range Intermediate, Inc. ("Zayo Parent"), a Delaware corporation formed to aggregate the ownership of various investment and co-investment vehicles ultimately managed by: (i) affiliates of EQT AB ("EQT"), a Swedish investment firm, and (ii) affiliates of DigitalBridge formed for the 2020 acquisition of Zayo.[3] Zayo Parent, through several

[3] Public Notice, *Applications Granted for the Transfer of Control of Zayo Group, LLC, Electric Lightwave, LLC, and Allstream Business US, LLC From Zayo Group Holdings, Inc. to*

intermediate U.S.-organized holding companies, is indirectly wholly owned by Front Range JV, LP ("JV LP"), a Delaware limited partnership. JV LP's equity and voting interests are held by U.S. and foreign investment entities ultimately controlled by EQT and DigitalBridge. The general partner of JV LP is Front Range JV GP, LLC ("JV GP"), a Delaware limited liability company. EQT and DigitalBridge each exercise negative control over Zayo Parent through the Board of Managers of JV GP. The EQT Infrastructure IV Fund ("EQT Fund") and DigitalBridge, through DigitalBridge Partners (DE AIV), LP and DigitalBridge Partners (DE AIV II), LP (collectively the "DBP LPs"), along with their respective co-investors, each hold approximately 45.2% of Zayo's equity. FMR, LLC ("Fidelity"), a Delaware limited liability company, holds approximately 7.6% of Zayo's equity. The remaining equity (approximately 1.8%) is held by current and former members of Zayo's management team.

Control over JV LP, and thus Zayo, is exercised through the Board of Managers of JV GP, which has thirteen members, with four members nominated each by EQT and DigitalBridge, one member nominated by Fidelity, one member, an independent non-executive Board Chair, chosen by consensus between DigitalBridge and EQT, two members nominated jointly by EQT and DigitalBridge, and the thirteenth member being the Chief Executive Officer. The Board Chair has a casting vote in the event of a tie vote among the Board.

Further details regarding the current indirect ownership of Zayo are set forth in **Exhibit A** and in ownership charts in **Exhibit B**. More information regarding DigitalBridge is available at www.digitalbridge.com.

B. Transferee – Duncan Holdco LLC

Front Range Topco, Inc., 35 FCC Rcd 275, WC Docket No. 19-166, DA 20-135 (WCB, IB, WTB Feb. 6, 2020).

Duncan, a Delaware limited liability company and an indirect wholly owned subsidiary of SoftBank, is a vehicle established for SoftBank investments in the United States. Duncan is a holding company with no independent operations of its own. Duncan's investment in DigitalBridge will be held indirectly through two intermediate entities, Duncan Holdco II LLC ("Duncan II"), and Duncan II's wholly owned subsidiary, Duncan Holdco III LLC ("Duncan III"). Duncan II and Duncan III, like Duncan, are Delaware limited liability companies established for SoftBank investments in the United States that have no independent operations of their own.

SoftBank, a publicly traded Japanese corporation (*Kabushiki Kaisha*), is a leading technology investor with broad investment in AI infrastructure, with which the Proposed Transaction aligns. SoftBank and its affiliates have invested over $150 billion in nearly 300 U.S. technology companies since 2017. As discussed in **Exhibit A**, attached, SoftBank's largest individual shareholder is Masayoshi Son, a citizen of Japan. SoftBank, Mr. Son, and many of SoftBank's various subsidiaries, including SoftBank Corp., its Japan-based telecommunications subsidiary, are well known to the Commission.[4]

C. Zayo Group, LLC

Zayo is a Delaware limited liability company headquartered at 1401 Wynkoop Street, Suite 500, Denver, CO 80202. Zayo is a leading U.S. provider of bandwidth infrastructure and interconnection services over regional and metropolitan fiber networks. These services enable customers to manage, operate, and scale their telecommunications and data networks. Zayo customers consist primarily of wireless service providers, national and regional communications

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[4] *See, e.g.*, Declaratory Ruling, *In re Univision Holdings II, Inc.*, MB Docket No. 21-321, DA 22-74 (MB Jan. 21, 2022); Memorandum Opinion and Order, Declaratory Ruling, and Order of Proposed Modification, *In re the Applications of T-Mobile US, Inc., and Sprint Corporation, for Consent to Transfer Control of Licenses and Authorizations*, WT Docket No. 18-197, FCC 19-103 (Nov. 5, 2019).

service providers, media, Internet, and content companies, banks, and other bandwidth-intensive enterprises. Zayo is authorized to provide competitive local exchange, competitive access, and/or interexchange services in the District of Columbia and every U.S. state except Alaska. Zayo is also authorized by the Commission to provide domestic (interstate) and international telecommunications services in addition to certain point-to-point wireless services. More information can be found on Zayo's website at www.zayo.com. Zayo is ultimately owned by investment funds affiliated with DigitalBridge and EQT.

Zayo is not one of the original licensees for the AmeriCan-1 Cable System. In 2000, MetroNet Fiber US, Inc. ("MFN") was added as a fourth licensee.[5] In 2003, MFN changed its name to Allstream Fiber US, Inc. ("Allstream").[6] In 2016, Allstream's interest in the AmeriCan-1 Cable System was transferred from MTS Inc., which was then Allstream's corporate parent, to Zayo and then merged with and into Zayo.[7] Zayo, therefore, acquired its ownership interest in the AmeriCan-1 Cable System in 2016 when it acquired Allstream.

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[5] *In the Matter of fONOROLA Fiber Development Inc. and Ledcor Industries, Inc. Application for Modification of License to Land and Operate in the United States a Fiber Optic Submarine Cable System Extending Between the United States and Canada*, Third Modification of a Cable Landing License, ICFS File No. SCL-MOD-19990901-00016, DA 00-315 (IB Feb. 18, 2000) (modifying the AmeriCan-1 Cable System "to add MetroNet Fiber US, Inc. (MetroNet) as a fourth licensee").

[6] *See International Authorizations Granted*, Report No. TEL-00710, DA No. 03-2877 (IB Sept. 11, 2003) (acknowledging MFN's notification of a name change to Allstream).

[7] *See Actions Taken Under Cable Landing License Act*, Report No. SCL-00175, DA 16-16 (IB Jan. 8, 2016) (consenting to the indirect transfer of control of Allstream's interest in the AmeriCan-1 Cable System from MTS Inc. to Zayo); *Actions Taken Under Cable Landing License Act*, Report No. SCL-00184, DA 16-703 (IB June 21, 2016) (approving the *pro forma* assignment of Allstream's interest in the AmeriCan-1 Cable System to Zayo).

II. Description of the Proposed Transaction

On December 29, 2025, DigitalBridge, its operating subsidiary DigitalBridge Operating Company, LLC ("DBOC"), Duncan, Duncan Sub I Inc. ("Merger Sub I"), and Duncan Sub II LLC ("Merger Sub II") entered into an Agreement and Plan of Merger (the "Agreement") pursuant to which Duncan will indirectly acquire a controlling interest in DigitalBridge and DBOC, through two coordinated reverse subsidiary mergers, with each target entity surviving the applicable merger. At closing, Merger Sub I, an indirect subsidiary of Duncan,[8] will merge with and into DigitalBridge, with DigitalBridge surviving as a majority-owned, indirect subsidiary of Duncan. Immediately following the first merger, Merger Sub II, a subsidiary of Merger Sub I, will merge with and into DBOC, with DBOC surviving as a direct subsidiary of DigitalBridge. As a result of these mergers, each of DigitalBridge and DBOC will become indirect subsidiaries of SoftBank. As discussed in Section III, below, after the closing of the Proposed Transaction, SoftBank anticipates that DigitalBridge will continue to operate as a separately managed platform.

The Applicants expect to close the Proposed Transaction in the second half of 2026, after the satisfaction of customary conditions, including the receipt of required regulatory approvals, including Commission approval. Effective immediately following the closing, the board of DigitalBridge is expected to be composed of seven (7) directors: two (2) members from the DigitalBridge executive team (Marc Ganzi, current and post-closing Chief Executive Officer, and Benjamin Jenkins, current President and Chief Investment Officer), one (1) director nominated by

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[8] As noted above, Duncan's interest in Merger Sub I and Merger Sub II will be held through two intermediate entities, Duncan II and Duncan III. The post-Proposed Transaction corporate ownership structure provided in **Exhibit B** illustrates the relationship between Duncan, Duncan II, and Duncan III, and the expected post-Transaction upstream ownership and control chain of DigitalBridge.

Messrs. Ganzi and Jenkins (and acceptable to SoftBank), and four (4) directors appointed by SoftBank.

The Proposed Transaction will not impact the ownership of Zayo as previously approved by the Commission. DigitalBridge and EQT will each continue to hold an approximate 45.2% interest indirectly in Zayo and will each continue to have negative control of Zayo, while Fidelity will continue to hold an approximate 7.6% interest indirectly in Zayo. Nor will the transaction change DigitalBridge's interest in JV GP or the GP entities ultimately owned by DigitalBridge. Although the ultimate ownership of DigitalBridge will change as its shares will no longer be traded publicly on the NYSE, the Proposed Transaction will not change DigitalBridge's indirect ownership interest in Zayo Parent or the Licensee, nor will it result in any change to the board that oversees Zayo Parent. Zayo Parent will continue to be operated by its dedicated management team and the Proposed Transaction is not expected to result in any changes to Zayo Parent or the Licensee's operations.

Diagrams depicting the pre- and post-Proposed Transaction corporate ownership structures are provided as **<u>Exhibit B</u>**.

III. Public Interest Statement

Applicants respectfully submit that approval of the Proposed Transaction is consistent with the public interest as it will provide the Licensee with continued access to DigitalBridge's financial and operational expertise, supplemented by that of SoftBank, permitting the Licensee to continue to execute on the operational plan developed by DigitalBridge and EQT to support Zayo Parent's broadband-first growth strategies, including investments in and expansion of the company's fiber network.

As a general remark, the Proposed Transaction involves the acquisition of DigitalBridge as an investment firm, which manages its portfolio companies in accordance with the financial interests of its investors via its general partner entities. The Proposed Transaction is not expected to impact the operations of the portfolio companies managed by DigitalBridge. The Proposed Transaction is therefore expected to leave the continuity and quality of services offered by DigitalBridge's portfolio companies, including the Licensee, unaffected. More specifically, SoftBank and DigitalBridge currently have no plans to change operations or implement changes to the current governance structure, management, or personnel/headcount of the Licensee. Rather, SoftBank, as a renowned and financially capable Japanese investor, will evaluate options to promote and foster the operations of DigitalBridge from an economic, financial, technical and organizational capacity perspective.

SoftBank shares DigitalBridge's commitment to long-term investment and scaling digital infrastructure. SoftBank's vision, capital strength, and global network are expected to allow DigitalBridge to accelerate its business objectives with greater flexibility, invest with a longer-term horizon on behalf of its investors, and better serve the world's leading technology companies as they scale their AI ambitions.[9] Following closing, DigitalBridge is expected to operate as a separately managed asset management platform within the wider SoftBank Group and will continue to be led by CEO Marc Ganzi. Mr. Ganzi, as CEO of DigitalBridge, will continue to determine the composition of the investment committees, only subject to SoftBank's reasonable approval.

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[9] The Proposed Transaction supports SoftBank's overall strategy in relation to next-generation AI, which SoftBank believes rests on the development and convergence of physical AI, including compute and digital infrastructure. SoftBank believes that DigitalBridge's portfolio of companies active in digital infrastructure, including data centers, cell towers, fiber networks, and edge infrastructure, advances SoftBank's capabilities in support of its strategic vision and commitment to driving innovation, including in AI development, deployment, and AI infrastructure. DigitalBridge's deep sector expertise is expected to enhance SoftBank's ability to originate, scale, and finance the foundational infrastructure needed for next-generation AI services and applications.

Regarding Zayo specifically, the Proposed Transaction is not expected to have any adverse effects on customers and will not alter the manner of service delivery or billing. Moreover, the Licensee will continue to comply with existing contracts, as applicable, subject to change in the ordinary course of business and in accordance with applicable law. The Licensee will continue to be operated by highly experienced, well-qualified personnel. The existing management, operations, and customer-facing teams of the Licensee will continue to manage its day-to-day business following completion of the Proposed Transaction.

The Proposed Transaction will not adversely affect competition in any domestic telecommunications market as neither SoftBank nor any of its affiliates have domestic wireline services in markets that compete with the Licensee. Indeed, as discussed above, the Proposed Transaction is expected to support and supplement Zayo Parent's competitiveness as it faces robust competition from an array of competitors.

For all these reasons, Applicants respectfully submit that the Transaction is consistent with the public interest and request that the Commission approve this Joint Application without delay.

IV. Information Required by Section 1.767 of the Commission's Rules

Applicants submit the following information in accordance with Section 1.767 of the Commission's Rules, 47 C.F.R. § 1.767:

A. 47 C.F.R. § 1.767(a)(1): Name, address and telephone number of Applicants

Licensee:	Zayo Group, LLC 1401 Wynkoop Street Suite 500 Denver, Colorado 80202 Tel: 866-364-6033
Transferor:	DigitalBridge Group, Inc. 750 Park of Commerce Drive Suite 210 Boca Raton, FL 33487 Tel: 561-570-4644

Transferee: Duncan Holdco LLC
300 El Camino Real
Menlo Park, CA 94025
Tel: 650-562-8100

B. 47 C.F.R. § 1.767(a)(2): Jurisdiction of formation of Applicants

Licensee: Zayo is a Delaware limited liability company.

Transferor: DigitalBridge is a Maryland corporation.

Transferee: Duncan is a Delaware limited liability company.

C. 47 C.F.R. § 1.767(a)(3): Correspondence concerning the application should be sent to the following persons:

<u>For Transferor and Licensee:</u>

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D. 47 C.F.R. § 1.767(a)(4): Description of the Cable System

A description of the AmeriCan-1 Cable System is on file with the Commission under ICFS File No. SCL-LIC-19980123-00002, as modified in SCL-MOD-19990901-00016, and in the AmeriCan-1 Renewal Application filed in ICFS File No. SCL-RWL-20251203-00082. These license files are incorporated by reference. The Transaction will have no effect on the description of the AmeriCan-1 Cable System.

E. 47 C.F.R. § 1.767(a)(5): Landing Stations

A description of the AmeriCan-1 Cable including its landing stations is on file with the Commission under ICFS File No. SCL-LIC-19980123-00002, as modified in SCL-MOD-19990901-00016 and in the AmeriCan-1 Renewal Application filed in ICFS File No. SCL-RWL-20251203-00082.[10] These license files are incorporated by reference. The Transaction will have no effect on the landing points or the day-to-day operations of the AmeriCan-1 Cable.

F. 47 C.F.R. § 1.767(a)(6): Common Carrier/Non-Common Carrier Status

[10] *See, e.g.*, Joint Application for Cable Landing License Renewal, Modification, and Consent to Assign Submarine Assets at 7, ICFS File No. SCL-RWL-20251203-00082 (explaining that the AmeriCan-1 Cable System's submarine segments "are short non-powered segments that do not have the need for traditional cable landing stations" and that these segments "terminate[] at beach manholes where they interconnect to a terrestrial cable"). As discussed in the AmeriCan-1 Renewal Application, the terrestrial cables running from the beach manholes at which the AmeriCan-1 Cable System submarine segments terminate enter equipment rooms in Seattle, WA; Whidbey Island, WA; Victoria, BC, Canada; Point Roberts, WA; and Vancouver, BC, Canada.

The AmeriCan-1 Cable System operates on a private carriage, non-common-carrier basis. The Transaction will have no impact on the classification of the cable system.

G. 47 C.F.R. § 1.767(a)(7): Proposed Ownership

Except with respect to the proposed indirect transfer of control of Zayo as a result of Duncan's acquisition of a controlling interest in DigitalBridge, the Proposed Transaction will not change the ownership of the AmeriCan-1 Cable System. The current and proposed ownership of Zayo following consummation of the Proposed Transaction appears in the attached **Exhibit A**.

H. 47 C.F.R. § 1.767(a)(8): Ownership Information Incorporating by Reference the Requirements of 47 C.F.R. §§ 63.18(h), (o), (p), and (q):

1. Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h)

The following directors and officers of Zayo are also directors or officers of a foreign carrier:

Lauren Lantero: Ms. Lantero is a director and officer (Chief Legal Officer and Secretary) of the following entities:

- Zayo Canada Inc.
- Zayo Global Reach UK Limited
- Zayo Group (HK) Limited
- Zayo Group Australia Pty. Ltd.
- Zayo Group South Africa (Pty) Ltd.
- Zayo Infrastructure Mexico S. de R.L. de C.V.
- Zayo Japan KK
- Zayo Singapore Pte. Limited

Jeff Noto: Mr. Noto is a director of the following entity:

- Zayo Infrastructure Mexico S. de R.L. de C.V.

Steve Smith: Mr. Smith is a director of the following entity:

- NextDC

Robert Merkel: Mr. Merkel is a director and officer (Assistant Treasurer, unless otherwise noted) of the following entities:

- Zayo Canada Inc. (Treasurer)
- Zayo Global Reach UK Limited
- Zayo Group (HK) Limited

- Zayo Group Australia Pty. Ltd.
- Zayo Group South Africa (Pty) Ltd.
- Zayo Japan KK
- Zayo Singapore Pte. Limited

Gabriela Torresani: Ms. Torresani is Assistant Secretary of the following entity:
- Zayo Canada Inc.

As noted above, the ownership information required by 47 C.F.R. § 63.18(h) appears in the attached **Exhibit A**.

2. Certification Regarding the Anti-Drug Abuse Act of 1988: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(o)

Applicants certify that they are not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance.[11]

3. Standard Questions Submitted to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(p)

Please see Sections V and VI below.

4. Section 63.18(q) Certifications: 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q)

The certifications required by 47 C.F.R. § 63.18(q) appear in the Verifications that immediately follow the signature page of this Joint Application. The Applicants designate the following individuals, each of whom is a U.S. citizen or lawful U.S. permanent resident, as points of contact in the United States for the execution of lawful requests and as agents for legal service of process:

[11] 21 U.S.C. § 862(a). Please note that Pub. L. No. 100-690, title V, §5301, 102 Stat. 4310 (1988), which related to denial of Federal benefits to drug traffickers and possessors—previously codified at 21 U.S.C. § 853(a)—was renumbered section 421 of the Controlled Substances Act by Public Law 101-647, title X, § 1002(d)(1), 104 Stat. 4827 (1990), and has been recodified as 21 U.S.C. § 862(a). This recodification is not reflected in 47 C.F.R. § 63.18(o).

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5. Certification Regarding Foreign Carrier Status, Foreign Affiliations, and Foreign Destination Markets: 47 C.F.R. §§ 1.767(a)(8)(ii), (iii)

Zayo is a non-dominant foreign carrier in Canada by virtue of its Reseller Registration and Basic International Telecommunication Services ("BITS") License. In addition, Zayo is, or will be following consummation of the Proposed Transaction, affiliated with the foreign carriers identified in **Exhibit C** below. None of these foreign carriers is a monopoly provider in its respective country of operation and each lack a 50 percent market share in the international transport and local access markets on the foreign end of the route. Accordingly, these foreign carriers lack sufficient market power on the foreign end of the international route to affect competition adversely in the U.S. market.

Zayo, in the AmeriCan-1 Renewal Application, is seeking renewed authorization to land and operate a submarine cable connecting the United States and Canada. Zayo certifies that: (i) Zayo is a non-dominant foreign carrier in Canada; (ii) Zayo controls Zayo Canada, Inc., a non-dominant foreign carrier in Canada; (iii) there is not an entity that owns more than 25 percent of Zayo in Canada, or that controls Zayo in Canada, or any other Zayo entity that controls a foreign carrier in Canada; and (iv) there are not two or more foreign carriers (or parties that control foreign carriers) that own, in the aggregate, more than 25 percent of Zayo and are parties to, or the beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer and use of capacity on the cable in the United States.

6. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Markets: 47 C.F.R. § 1.767(a)(8)(iv)

All the countries where Zayo has, or will have following consummation of the Proposed Transaction, affiliates are members of the World Trade Organization ("WTO").

7. Certification that Applicants accept and will abide by the routine conditions specified in 47 C.F.R. §§ 1.767(a)(9), (g), 1.70007

Applicants certify that they accept and will abide by the routine conditions specified in 47 C.F.R. §§ 1.767(g) and 1.70007.

V. Standard Questions Submitted to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector

As discussed in Section VI, below, Applicants respectfully request that the Commission exercise its discretion and exempt this Joint Application from a separate national security review by the Committee for the Assessment of Foreign Participation in the U.S. Telecommunications Services Sector (the "Committee"). The Applicants are providing the Committee a complete copy of this Joint Application. Further, Applicants have already submitted responses to the

Commission's Standard Questions in connection with renewal of the AmeriCan-1 Cable System license and the Proposed Transaction as follows:

1. Responses to Standard Questions regarding Submarine Cable Applications:

- Zayo Group, LLC Submission of Responses to Standard Questions (Dec. 5, 2025)
- Zayo Group, LLC Submission of Responses to Tailored Questions (Feb. 6, 2026)
- Duncan Holdco LLC/SoftBank Submission of Responses to Standard Questions (March 4, 2026)

2. Responses to Standard Questions regarding DigitalBridge/SoftBank Section 214 Transfer of Control Application

- Zayo/DigitalBridge/Duncan/SoftBank Responses March 5, 2026

3. Responses to Standard and Tailored Questions regarding Zayo/Crown Section 214 Transfer of Control Application

- Responses to standard questions May 15, 2025
- Responses to Round 1 Tailored Questions August 8, 2025
- Responses to Round 2 Tailored Questions September 16, 2025
- Responses to Round 3 Tailored Questions December 16, 2025
- Responses to Round 4 Tailored Questions January 16, 2025

VI. National Security Review

Applicants respectfully request that the Commission exercise its discretion and exempt this Joint Application from national security review by the Committee. While it is the case that, under 47 C.F.R. § 1.70016(a)(4), Duncan is ultimately controlled by a non-U.S. entity, and that the Proposed Transaction would result in such non-U.S. entity holding a ten percent or greater direct or indirect equity or voting interest, or a controlling interest, in Zayo, the Applicants respectfully request that the Commission exercise its discretion under 47 C.F.R. § 1.40001(a) to not refer this Joint Application to the Committee, and rather proceed with streamlined treatment.

The Commission has broad discretion to manage telecommunications policy and approach in the United States, and, indeed, the Commission's rules expressly reiterate and underscore this complete discretion over whether to refer applications to the Committee for review. As set forth in 47 CFR § 1.40001(a), "[t]he Commission, *in its discretion*, *may* refer applications…to the executive branch…" (emphasis added).

There are no specific and compelling national security, law enforcement, or other justifications to defer action in this instance. Zayo has *very* recently been subject to a fulsome review by the Committee in association with Zayo's acquisition of the fiber business of Crown Castle.[12] Further, Zayo is currently subject to Committee oversight under a Letter of Agreement ("LOA"), which was signed in 2020 between Zayo, the U.S. Department of Homeland Security ("DHS"), and the U.S. Department of Justice ("DOJ").[13]

As noted above, the Committee recently investigated the stewardship of Zayo in relation to the transfer of control of Crown Castle's fiber business to Zayo, and in connection with that review, which has not yet concluded, Zayo is expected to execute a new LOA (the "Expected 2026 LOA") which Zayo expects will be filed with the Commission on or about Day 120 of the Committee's review period.[14]

[12] *See* WC Docket No. 25-174.

[13] *See* Letter of Agreement between Zayo Group Holdings, Inc., *et al.*, the U.S. Department of Justice, and the U.S. Department of Homeland Security, WC Docket No. 19-166 (Jan. 21, 2020).

[14] Zayo originally expected to file this new LOA with the Commission on or about March 19, 2026, which was the original end date for the Committee's 120-day review period. *See* Letter from Jessica Campbell, Attorney Advisor, Foreign Investment Review Section, National Security Division, U.S. Department of Justice, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 25-174 (filed Nov. 19, 2025) ("The Committee shall complete its initial review of the Applications before the end of the 120-day initial review period, which begins on the date of this letter."). However, because of lapses in appropriations affecting a member of the Committee, the Committee has paused its review, which has extended the 120-day review period. *See* Letter from Christopher R. Clements, Deputy Chief, Telecommunications and Supply Chain, Foreign

More importantly, the Committee is already reviewing the pending renewal application for the AmeriCan-1 Cable System, including Zayo's minority ownership interest in that system. As indicated above, in connection with that pending application, which the Commission and the Committee are reviewing as part of a separate proceeding, the Applicants have already submitted to the Committee all of the information regarding Zayo, DigitalBridge, and SoftBank required under the Commission's rules to enable the Committee's diligent review. The Committee's (and the Commission's) review in that proceeding will provide the opportunity for an evaluation of the AmeriCan-1 Licensees, including Zayo and its ultimate indirect owners, and the imposition of any necessary conditions related to the renewal and future operation of the AmeriCan-1 Cable System. Pursuant to that process, which is separate and distinct from the Proposed Transaction to which this Joint Application relates, the Applicants will be available to answer any questions the Committee has regarding Zayo's ownership.

Further, as detailed in Section II, *supra*, although the ultimate ownership of DigitalBridge will change as its shares will no longer be traded publicly on the NYSE, the Proposed Transaction will not change DigitalBridge's indirect ownership interest in Zayo Parent or the Licensee, nor will it result in any change to the board that oversees Zayo Parent. Zayo Parent will continue to be operated by its dedicated management team, and the Proposed Transaction is not expected to result in any changes to Zayo Parent or the Licensee's operations.

Investment Review Section, National Security Division U.S. Department of Justice, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 25-174 (filed Feb. 17, 2026). The Committee filed a similar lapse notice for the period of January 30, 2026, through February 3, 2026. *See* Letter from Christopher R. Clements, Deputy Chief, Telecommunications and Supply Chain, Foreign Investment Review Section, National Security Division U.S. Department of Justice, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 25-174 (filed Feb. 5, 2026).

Zayo is committed to complying with its obligations under its existing LOA unless and until it is replaced, at which time Zayo commits to complying with its obligations under the Expected 2026 LOA. Zayo commits to such compliance after closing of the Proposed Transaction, and Duncan, through its ownership at SoftBank, has agreed to assume in conjunction with DigitalBridge any obligations applicable to the indirect ownership of Zayo under the Expected 2026 LOA. Thus, taken together, these commitments should allay any national security or law enforcement concerns. The obligations under the Expected 2026 LOA will continue to apply once the Commission approves the Proposed Transaction. Consistent with Applicants' request for exemption from review by the Committee, Applicants further request that the Commission condition grant of this Joint Application on Zayo's and SoftBank's (through Duncan) continued compliance with the obligations under the Expected 2026 LOA.[15]

The Commission, in its *Executive Branch Process Reform Order*,[16] excluded from referral "international section 214 applications where the applicant has an existing mitigation agreement, there are no new reportable foreign owners of the applicant since the effective date of the mitigation agreement, and the applicant agrees to continue to comply with the terms of that mitigation agreement." The Commission adopted this exclusion, finding such transactions presented a "low or minimal risk to national security, law enforcement, foreign policy, and trade

[15] Further, assuming the Committee will request a mitigation agreement from the Licensees of the AmeriCan-1 System at the conclusion of its review of the pending renewal application, Zayo is similarly committed to complying with any obligations it would have under such mitigation agreement. As is the case with the Expected 2026 LOA, SoftBank would assume in conjunction with DigitalBridge any obligations applicable to the indirect ownership of Zayo under such a new mitigation agreement.

[16] *Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, 35 FCC Rcd 10927, 10938 ¶ 30 (2020).

policy concerns."[17] Applicants recognize that the *Executive Branch Process Reform Order* specifically excluded submarine cables from this exemption.

For the reasons stated above, however, Applicants contend that the underpinnings of the Commission's exclusion of certain international 214 applications from automatic referral to the Committee are equally applicable here. Non-referral is within the Commission's discretion and would be consistent with the Commission's policy as articulated in the *Executive Branch Process Reform Order* because (1) the Expected 2026 LOA is expected to be in place during the pendency of this Joint Application; (2) the Commission and the Committee will have been made aware of SoftBank's proposed indirect ownership of Zayo prior to the execution of the Expected 2026 LOA; and (3) SoftBank, through Duncan, has agreed to assume in conjunction with DigitalBridge any obligations under the Expected 2026 LOA that are applicable to the indirect ownership of Zayo. Applicants thus request that the Commission condition grant of this Application on Zayo's and SoftBank's continued compliance with the Expected 2026 LOA, which the Applicants will be filing with the Commission immediately upon execution.

Accordingly, the Commission should exercise its discretion not to refer this Joint Application to the Committee, as grant of the Joint Application presents no additional risk to national security, law enforcement, foreign policy, and trade policy or the like.

VII. Conclusion

For the foregoing reasons, Applicants submit that the public interest, convenience, and necessity would be served by a grant of this Joint Application for a Transfer of Control of Licensee's interest in the AmeriCan-1 Cable System, and the Applicants respectfully request that this application be granted.

[17] *Id*.

For Transferor and Licensee:

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Dated: April 21, 2026

Exhibit A
Ownership

1. Zayo Group, LLC (**Licensee**)
   a. Jurisdiction of Formation: Delaware
   b. Address: 1401 Wynkoop Street, Suite 500, Denver, CO 80202
   c. Principal Business: Telecommunications Provider
   d. Interest Held: 100% .

2. Zayo Group Holdings, Inc.
   a. Jurisdiction of Formation: Delaware
   b. Address: 1401 Wynkoop Street, Suite 500, Denver, CO 80202
   c. Principal Business: Holding Company
   d. Interest Held: 100% equity and voting (directly as 100% owner of Zayo Group, LLC (#1)).

3. Front Range TopCo, Inc.
   a. Jurisdiction of Formation: Delaware
   b. Address: 1401 Wynkoop Street, Suite 500, Denver, CO 80202
   c. Principal Business: Holding Company
   d. Interest Held: 100% equity and voting (indirectly as 100% owner of Zayo Group Holdings, Inc. (#2)).

4. Front Range Intermediate, Inc. ("Zayo Parent")
   a. Jurisdiction of Formation: Delaware
   b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
   c. Principal Business: Holding Company
   d. Interest Held: 100% equity and voting (indirectly as 100% owner of Front Range TopCo, Inc (#3).

5. Front Range Intermediate Holdings, Inc.
   a. Jurisdiction of Formation: Delaware
   b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
   c. Principal Business: Holding Company
   d. Interest Held: 100% equity and voting (indirectly as 100% owner of Front Range Intermediate, Inc. (#4)).

6. FR TopCo, LLC
   a. Jurisdiction of Formation: Delaware
   b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
   c. Principal Business: Holding Company
   d. Interest Held: 100% equity and voting (indirectly as 100% owner of Front Range Intermediate Holdings, Inc. (#5)).

Details regarding the ownership information for Zayo Parent and its parents, intermediate parents, and ultimate owners are listed below.[18] Front Range Intermediate, Inc. is indirectly jointly

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[18] Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

owned by EQT AB ("EQT") and DigitalBridge Group, Inc. ("DigitalBridge"). The EQT Infrastructure IV Fund ("the EQT Fund") (including its coinvestors) and the DigitalBridge, through DigitalBridge Partners (DE AIV), LP and DigitalBridge Partners (DE AIV II), LP (together, the "DigitalBridge Fund") (including its coinvestors) each have approximately 45.2% of Zayo's equity, and FMR, LLC ("Fidelity") has approximately 7.6% of the equity. The remaining equity (approximately 1.8%) is held by current and former members of Zayo's management team.

The investors disclosed below are those that hold an interest (whether voting or equity) of ten percent (10%) or more of the entity immediately below in the chain of ownership.

7. Front Range JV, LP ("Front Range JV")

a. Jurisdiction of Formation: Delaware
b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
c. Principal Business: Holding Company
d. Interest Held: 100% equity and voting (indirectly as 100% owner of FR TopCo, LLC (#6)).

The following entities identified in items 8, 12, and 32 below each are a Limited Partner ("LP") of Front Range JV, and as a result upon closing the transaction are expected to hold a ten percent (10%) or greater indirect interest in Zayo.[19] These entities are intended to aggregate the investment capital that the LP investors (including co-investors) in the EQT Fund and DigitalBridge Fund, respectively, have contributed to the EQT Fund and/or DigitalBridge Fund.

<u>EQT Fund</u>

The EQT Fund, which closed in 2019, has received EUR 9 billion (approximately $10.1 billion) in capital commitments from its LP investors, including pension funds, banks, insurance companies, sovereign wealth funds and funds-of-funds. The LPs provide capital upon request (up to their maximum committed capital) for the investments made by the EQT Fund. Under the terms of the relevant partnership agreements, investments of capital by these LPs are passive investments and these LPs have no control over the day-to-day activities of the EQT Fund or its portfolio companies, including Zayo.

Investments by the EQT Fund are typically made through one or more US or Luxembourg limited partnerships, which act as aggregator vehicles for the multiple LPs and other investment arrangements, including co-investors, that comprise the EQT Fund, and such partnerships and arrangements are also managed by EQT Fund Management S.à r.l. Under the structure of the EQT Fund and consistent with European Union ("EU") regulations regarding investment fund management, day-to-day control and management of any portfolio acquisition would be indirectly exercised by the applicable fund manager, EQT Fund Management S.à r.l., through its position as the manager of the EQT Fund. EQT Fund Management S.à r.l. is ultimately controlled by EQT.

[19] Each of the entities listed in this section is itself a limited partnership or limited liability company, which has certain other members (the funds' respective LP investors and co-investors) that will not exercise any control over the entity. None of the LP investor and co-investor members have a 10% indirect ownership interest in Zayo.

Pursuant to this arrangement, EQT has the authority to appoint (and change) the board of EQT Fund Management S.à r.l.

The immediate controlling owners — the General Partners ("GPs")— of each of the limited partnerships comprising the EQT Fund (including co-investor vehicles) — EQT Infrastructure IV (GP) SCS (#39); EQT Infrastructure IV (General Partner) S.à r.l. (#40), EQT Saber Topside GP LLC (#38) and the Alternative Investment Fund Manager — EQT Fund Management S.à r.l. — are all directly or indirectly owned and controlled by EQT and its owners are identified below beginning with EQT Saber Topside GP LLC (#38) below. Information regarding each of these entities and their ownership are set forth below.

The DigitalBridge Fund

The DigitalBridge Fund is comprised of equity commitments from its passive LP investors, including co-investors. The DigitalBridge Fund has raised approximately $4.05 billion in capital. The DigitalBridge Fund has closed. Investors in the DigitalBridge Fund, as well as co-investors, participate in Zayo's investment according to their respective interests in the DigitalBridge Fund as a whole (based on their commitment size). Similarly, under the terms of the relevant partnership agreements, investments of capital by these LPs are passive investments and these LPs have no control over the day-to-day activities of the DigitalBridge Fund or its portfolio companies, including Zayo.

A series of parallel limited partnerships aggregating the equity from the DigitalBridge Fund and its co-investors and the EQT Fund and its co-investors indirectly hold the equity in Zayo. The entities that hold a ten percent (10%) or greater interest in Zayo Parent through Front Range JV are:

8. Front Range REIT, LP
  a. Jurisdiction of Formation: Delaware
  b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
  c. Principal Business: Holding Company
  d. Interest Held: 56.02% equity / 56.02% deemed voting (indirectly as 56.02% limited partner of Front Range JV (#7)).

9. Front Range Parent, LP
  a. Jurisdiction of Formation: Delaware
  b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
  c. Principal Business: Holding Company
  d. Interest Held: 56.02% equity / 56.02% deemed voting (indirectly as sole limited partner of Front Range REIT, LP (#8)).

The GP of Front Range JV (#7), Front Range REIT, LP (#8) and Front Range Parent, LP (#9) is:

10. Front Range JV GP, LLC
  a. Jurisdiction of Formation: Delaware
  b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
  c. Principal Business: Holding Company

d. Interest Held: 0% equity / 100% voting (indirectly as GP of Front Range JV (#7), Front Range REIT, LP (#8) and Front Range Parent, LP (#9)).

Control over Front Range JV, and thus Zayo is exercised through the Board of Managers of Front Range JV GP, LLC (#10) which has 13 members, with 4 members nominated each by EQT and DigitalBridge, 1 member nominated by Fidelity, 1 member, an independent non-executive Chairman, chosen by consensus between DigitalBridge and EQT, 2 members nominated jointly by EQT and DigitalBridge, and the 13th member is the Chief Executive Officer. The Board Chair has a casting vote in the event of a tie vote among the Board.

11. Impresa Fund V LLC

a. Jurisdiction of Formation: Delaware
b. Address of principal place of business: 255 State Street Boston, Massachusetts 02109
c. Principal Business: Investments
d. Interest Held: 7.67% equity (indirectly as 13.70% limited partner of Front Range Parent, LP (#9)) and less than 10% voting (as one member of 13-person Board of Managers of Front Range JV GP, LLC (#10)).

Impresa Fund V LLC is a private equity investment fund established to benefit employees of FMR, LLC and affiliates. FMR, LLC (which operates as Fidelity Investments®) is a U.S. financial services entity. Members of the Johnson family, including Abigail P. Johnson, are the predominant owners, directly or through trusts, of Series B voting common shares of FMR, LLC, representing 49% of the voting power of FMR, LLC. The Johnson family group and all other Series B shareholders have entered into a shareholders' voting agreement under which all Series B voting common shares will be voted in accordance with the majority vote of Series B voting common shares. Accordingly, through their ownership of voting common shares and the execution of the shareholders' voting agreement, members of the Johnson family may be deemed, under the Investment Company Act of 1940 (15 U.S.C. § 80a), to form a controlling group with respect to FMR, LLC.

A. **<u>DigitalBridge Fund Structure</u>**

The DigitalBridge Fund entities that are LPs of Front Range JV (#7):

12. DC Front Range Holdings-F, LP

a. Jurisdiction of Formation: Delaware
b. Address: 750 Park of Commerce Drive, Suite 210, Boca Raton, FL 33487
c. Principal Business: Investments
d. Interest Held: 17.38% equity / 0% voting (indirectly as 17.38% limited partner of Front Range JV (#7)).

The DigitalBridge Fund entity that is an LP of Front Range Parent, LP (#9) holding a ten percent (10%) or greater interest in Zayo is:

13. DC Front Range Holdings, LP

a. Jurisdiction of Formation: Delaware
b. Address: 750 Park of Commerce Drive, Suite 210, Boca Raton, FL 33487
c. Principal Business: Investments

d. Interest Held: 22.60% equity / 0% voting (indirectly as 40.34% limited partner of Front Range Parent, LP (#9)).

The DigitalBridge Fund entity that is a LP of DC Front Range Holdings, LP (#13) holding a ten percent (10%) or greater interest in Zayo is:

14. DC Front Range Holdings I, LP

a. Citizenship: Delaware
b. Address: 750 Park of Commerce Drive, Suite 210, Boca Raton, FL 33487
c. Principal business: Investments
d. Interest Held: 16.15% equity / 0% voting (indirectly as 71.48% limited partner of DC Front Range Holdings, LP (#13)).

No LP of DC Front Range Holdings I, LP (#14) holds a ten percent (10%) or greater interest in Zayo.

The GP of DC Front Range Holdings, LP (#13) is:

15. DC Front Range Holdings GP, LLC

a. Jurisdiction of Formation: Delaware
b. Address: 750 Park of Commerce Drive, Suite 210, Boca Raton, FL 33487
c. Principal Business: General Partner
d. Interest Held: 0% equity / 45% voting (indirectly as the General Partner of DC Front Range Holdings, LP (#13)).

The GP of DC Front Range Holdings-F, LP (#12) and DC Front Range Holdings I, LP (#14), and the sole member of DC Front Range Holdings GP, LLC (#15) is:

16. DC Front Range GP, LLC

a. Jurisdiction of Formation: Delaware
b. Address: 750 Park of Commerce Drive, Suite 210, Boca Raton, FL 33487
c. Principal Business: General Partner
d. Interest Held: 0% equity / 45% voting (as General Partner of DC Front Range Holdings-F, LP (#12), DC Front Range Holdings I, LP (#14) and sole member of DC Front Range Holdings GP, LLC (#15)).

The managing member of DC Front Range GP, LLC (#16) is:

17. DigitalBridge GP, LLC

a. Jurisdiction of Formation: Delaware
b. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
c. Principal Business: General Partner
d. Interest Held: 0% equity / 45% voting (indirectly as 100% managing member of DC Front Range GP, LLC (#16)).

The following entities control ten percent (10%) or more of the Licensee indirectly through their membership interest in DigitalBridge GP, LLC (#17):

18. Name: DigitalBridge DCP I Carry, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as co-managing member of DigitalBridge GP, LLC (#17)).

19. Name: DigitalBridge DBP Holdco, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as co-managing member of DigitalBridge GP, LLC (#17)).

The following entity controls ten percent (10%) or more of the Licensee indirectly through its membership interest in DigitalBridge DCP I Carry, LLC (#18):

20. Name: DigitalBridge Digital IM Holdco, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as sole voting member of DigitalBridge DCP I Carry, LLC (#18)).

The following entity controls ten percent (10%) or more of the Licensee indirectly through its membership interest in DigitalBridge DBP Holdco, LLC (#19):

21. Name: Colony Capital Master GP, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as managing member of DigitalBridge DBP Holdco, LLC (#19)).

The following entity controls ten percent (10%) or more of the Licensee indirectly through its membership interest in DigitalBridge Digital IM Holdco, LLC (#20) and Colony Capital Master GP, LLC (#21):

22. Name: DigitalBridge Investment Holdco, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as sole member of DigitalBridge Digital IM Holdco, LLC (#20) and Colony Capital Master GP, LLC (#21)).

The following entity controls ten percent (10%) or more of the Licensee indirectly through its membership interest in DigitalBridge Investment Holdco, LLC (#22):

23. Name: DigitalBridge OP Subsidiary, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as sole member of DigitalBridge Investment Holdco, LLC (#22)).

The following entity controls ten percent (10%) or more of the Licensee indirectly through its membership interest in DigitalBridge OP Subsidiary, LLC (#23):

24. Name: DigitalBridge Operating Company, LLC

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as 100% owner of DigitalBridge OP Subsidiary, LLC (#23)).

The following entity controls ten percent (10%) or more of the Licensee indirectly through its membership interest in DigitalBridge Operating Company, LLC (#24):

25. Name: DigitalBridge Group, Inc.

a. Address: 750 Park of Commerce Drive, Suite 210 Boca Raton, FL 33487
b. Jurisdiction of Formation: Maryland
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as 97% owner of DigitalBridge Operating Company, LLC (#24)).

DigitalBridge Group, Inc. (#25) is currently publicly traded (NYSE: DBRG). There are no 10% or greater owners of either equity or voting rights in DigitalBridge Group, Inc. The remaining approximate 3% ownership of DigitalBridge Operating Company, LLC (#24) is held by current and former executives of DigitalBridge Group, Inc. none of whom hold a 10% or greater interest in DigitalBridge Operating Company, LLC (#24) or Zayo.

Post-Proposed Transaction Ownership of DigitalBridge Group, Inc.

At closing of the Proposed Transaction, the following entities will hold ownership interests in DigitalBridge Group, Inc. (#25), that by virtue of such ownership under Commission rules would hold a 10% or greater interest in the Licensee. Please note that after the Proposed Transaction, DigitalBridge Group, Inc.'s (#25) interest in DigitalBridge Operating Company, LLC (#24) will increase from 97% to 100%.[20]

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[20] Prior to or around the time of closing of the Proposed Transaction, a newly formed intermediary entity will be inserted between DigitalBridge Operating Company, LLC and Duncan Holdco III LLC (#26). This intermediate entity, which will be a wholly owned subsidiary of Duncan Holdco III LLC, will hold a direct ownership interest in DigitalBridge

26. Name: Duncan Holdco III LLC

a. Address: 300 El Camino Real, Menlo Park, CA 94025
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as controlling shareholder[21] of DigitalBridge Group, Inc. (#25)[22])

27. Name: Duncan Holdco II LLC

a. Address: 300 El Camino Real, Menlo Park, CA 94025
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as 100% owner of Duncan Holdco III LLC (#26))

28. Name: Duncan Holdco LLC

a. Address: 300 El Camino Real, Menlo Park, CA 94025
b. Jurisdiction of Formation: Delaware
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as controlling member[23] of Duncan Holdco II LLC. (#27)).

Operating Company, LLC (#24) of approximately 3% and, as a result, will not hold an attributable indirect equity or voting interest in the Licensees of ten percent or more. This intermediary entity therefore does not appear in the attached post-closing organizational chart.

[21] Duncan Holdco III LLC is expected to hold a 100% voting interest and approximate 98% equity interest in DigitalBridge Group, Inc. The exact equity interest Duncan Holdco III LLC will hold in DigitalBridge Group, Inc. will not be determined until around the close of the Proposed Transaction.

[22] It is currently contemplated that a certain amount of equity awards and preferred shares in DigitalBridge Group, Inc. will remain outstanding following the Proposed Transaction. The aggregate equity interest in DigitalBridge Group, Inc. represented by these awards and preferred shares is expected to be less than 2%, and these interests will not confer voting rights. As a result, these ownership interests would not amount to an attributable indirect equity or voting interest in the Licensees of 10% or more. These interests therefore do not appear in the attached post-closing organizational chart and are provided for the sake of completeness only.

[23] Duncan Holdco LLC is expected to hold a controlling voting interest and approximate 95% equity interest in Duncan Holdco II LLC. The exact equity interest Duncan Holdco LLC will hold in Duncan Holdco II LLC will not be determined until around the close of the Proposed Transaction. Certain current and former members of the senior management of DigitalBridge Group, Inc. are expected to hold interests in Duncan Holdco II LLC at closing of the Proposed Transaction, but these interests will not in the aggregate amount to an attributable voting or equity interest in the Licensee of 10% or more. Likewise, no individual owner in this group will hold an attributable 10%-or-greater voting or equity interest in the Licensee. This group therefore does not appear in the attached post-closing organizational chart.

29. SoftBank Group Overseas GK

a. Address: 1-7-1 Kaigan, Minato-ku, Tokyo, Tokyo 105-7537, Japan
b. Jurisdiction of Formation: Japan
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as 100% owner Duncan Holdco LLC (#28)).

30. SoftBank Group Corp.

a. Address: 1-7-1 Kaigan, Minato-ku, Tokyo, Tokyo 105-7537, Japan
b. Jurisdiction of Formation: Japan
c. Principal Business: Investments
d. Interest Held: 0% equity / 45% voting (indirectly as 100% owner of SoftBank Group Overseas GK (#29)).

31. Masayoshi Son

a. Address: c/o SoftBank Group Corp., 1-7-1 Kaigan, Minato-ku, Tokyo, Tokyo 105-7537, Japan
b. Citizenship: Japan
c. Principal Business: Investments
d. Interest Held: 0% equity / 13.48% voting (indirectly as approximately 29.95% direct shareholder of SoftBank Group Corp. (#30)).))[24]

SoftBank Group Corp. (#30) is a publicly traded Japanese corporation (*Kabushiki Kaisha*). Other than Mr. Masayoshi Son (#31), no individual shareholder in SoftBank Group Corp. holds an ownership interest in SoftBank Group Corp. that under the Commission's rules would result in that shareholder being deemed to hold a ten percent (10%) or more voting or equity interest in Zayo or the Licensee at the close of the Proposed Transaction.[25]

B. <u>EQT Fund Structure</u>

The following EQT Fund entity is an LP of Front Range JV (#7) and that holds a ten percent (10%) or greater interest in the Licensee:

32. EQT Saber Lower Aggregator 2, LP

a. Jurisdiction of Formation: Delaware
b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
c. Principal Business: Holding Company

[24] As of the date of this filing, Mr. Masayoshi Son directly owns 29.95% of the shares of SoftBank Group Corp. Mr. Masayoshi Son's interest in SoftBank Group Corp. fluctuates slightly over time.

[25] The largest shareholder interest in SoftBank Group Corp. after Mr. Masayoshi Son is 17.12%, which reflects shares held in a trust account at The Master Trust Bank of Japan, Ltd. (Address: c1-8-1 Akasaka, Minato-ku, Tokyo, Tokyo 107-8472, Japan; Jurisdiction of Formation: Japan; Principal Business: Investments) for various institutional investors.

   d. Interest Held: 19.46% equity / 19.46% deemed voting (indirectly as 19.46% limited partner of Front Range JV (#7)).

The LP of EQT Saber Lower Aggregator 2, LP (#32) that holds a ten percent (10%) or greater interest in the Licensee is:

33. EQT Infrastructure IV Co-Investment (D) SCSp

   a. Jurisdiction of Formation: Luxembourg
   b. Address: 26A Boulevard Royal L-2449 Luxembourg, Grand Duchy of Luxembourg, Grand Duchy of Luxembourg
   c. Principal Business: Holding Company
   d. Interest Held: 12.87% equity / 12.87% deemed voting (indirectly as 66.14% limited partner of EQT Saber Lower Aggregator 2, LP (#32)).

No LPs of EQT Infrastructure IV Co-Investment (D) SCSp (#33) indirectly hold a ten percent (10%) or greater interest in the Licensee.

The EQT Fund entity that is an LP of Front Range Parent, LP (#9) and that holds a ten percent (10%) or greater interest in the Licensee is:

34. EQT Saber Lower Aggregator 1 LP

   a. Jurisdiction of Formation: Delaware
   b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
   c. Principal Business: Holding Company
   d. Interest Held: 25.75% equity / 25.75% deemed voting (indirectly as 45.96% limited partner of Front Range Parent, LP (#9)).

The LP of EQT Saber Lower Aggregator 1 LP (#34) that holds a ten percent (10%) or greater interest in the Licensee is:

35. EQT Saber Upper Aggregator 1 LP

   a. Jurisdiction of Formation: Delaware
   b. Address: c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
   c. Principal Business: Holding Company
   d. Interest Held: 16.76% equity / 16.76% deemed voting (indirectly as 65.10% limited partner of EQT Saber Lower Aggregator 1, LP (#34)).

The LP of EQT Saber Upper Aggregator 1 LP (#35) that holds a ten percent (10%) or greater interest in the Licensee is:

36. EQT Saber Side Car (No. 2) EUR LP

   a. Jurisdiction of Formation: Delaware
   b. c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
   c. Principal Business: Holding Company
   d. Interest Held: 10.22% equity / 10.22% deemed voting (indirectly as 61.00% limited partner of EQT Saber Upper Aggregator 1, LP (#35)).

The LP of EQT Saber Side Car (No. 2) EUR LP (#36) that holds a ten percent (10%) or greater interest in the Licensee is:

37. EQT Saber Side Car (No. 1) EUR SCSp[26]

a. Jurisdiction of Formation: Luxembourg
b. Address: 26A Boulevard Royal L-2449 Luxembourg, Grand Duchy of Luxembourg, Grand Duchy of Luxembourg
c. Interest Held: 10.12% equity / 10.12% deemed voting (indirectly as 98.98% limited partner of EQT Saber Side Car (No. 2) EUR LP (#36)).

The GP of EQT Saber Lower Aggregator 2 LP (#32); EQT Saber Lower Aggregator 1 LP (#34); EQT Saber Upper Aggregator 1 LP (#35); and EQT Saber Side Car (No. 2) EUR LP (#36) is:

38. EQT Saber Topside GP LLC

a. Jurisdiction of Formation: Delaware
b. c/o EQT Partners, Inc., 245 Park Ave., 34th Floor, New York, NY 10167
c. Principal Business: General Partner
d. Interest Held: 0% equity / 45% voting (indirectly as General Partner of EQT Saber Lower Aggregator 2 LP (#32); EQT Saber Lower Aggregator 1 LP (#34); EQT Saber Upper Aggregator 1 LP (#35); EQT Saber Side Car (No. 2) EUR LP (#36)).

The GP of EQT Saber Side Car (No. 1) EUR SCSp (#37) is:

39. EQT Infrastructure IV (GP) SCS[27]

a. Jurisdiction of Formation: Luxembourg
b. Address: 26A Boulevard Royal L-2449 Luxembourg, Grand Duchy of Luxembourg
c. Principal Business: General Partner
d. Interest Held: 0% equity / 45% voting (indirectly as General Partner of EQT Saber Side Car (No. 1) EUR SCSp (#37)).

The GP of EQT Infrastructure IV (GP) SCS (#39) is:

40. EQT Infrastructure IV (General Partner), S.à r.l.

a. Jurisdiction of Formation: Luxembourg
b. Address: 26A, Boulevard Royal, L-2449 Luxembourg, Grand Duchy of Luxembourg, Grand-Duchy of Luxembourg
c. Principal Business: General Partner
d. Interest Held: 0% equity / 45% voting (indirectly as General Partner of EQT Infrastructure IV (GP) SCS (#39)).

[26] A Luxembourg Société Commandite Simple Speciale (“SCSp”) is most similar to a U.S. limited partnership.

[27] A Luxembourg Société en Commandite Simple (“SCS”) is most similar to a U.S. limited partnership.

The sole LP of EQT Infrastructure IV (GP) SCS (#39) is:

41. EQT Holdings Infrastructure IV Coöperatief U.A.[28]

a. Jurisdiction of Formation: Netherlands
b. Address: Cornelis Schuytstraat 74; 1071JL Amsterdam; Netherlands
c. Principal Business: Investment Holding Vehicle
d. Interest Held: 0% equity / 45% voting (indirectly as limited partner of EQT Infrastructure IV (GP), SCS (#39)).

The Alternative Investment Fund Manager ("AIFM") for the EQT Fund, and all of its investment vehicles is:

42. EQT Fund Management S.à r.l.[29]

a. Jurisdiction of Formation: Luxembourg
b. Address: 26A, Boulevard Royal, L-2449 Luxembourg, Grand Duchy of Luxembourg, Grand-Duchy of Luxembourg
c. Principal Business: Fund Manager
d. Interest Held: AIFM of EQT Saber Lower Aggregator 2 LP (#32); EQT Saber Lower Aggregator 1 LP (#34); EQT Saber Upper Aggregator 1 LP (#35); EQT Saber Side Car (No. 2) EUR LP (#36); and EQT Saber Side Car (No. 1) EUR, SCSp (#37).

EQT Infrastructure IV (General Partner) S.à r.l. (#40) and EQT Saber Topside GP LLC (#38) are wholly owned by:

43. EQT Management S.à r.l.

a. Jurisdiction of Formation: Luxembourg
b. Address: 26A, Boulevard Royal, L-2449 Luxembourg, Grand Duchy of Luxembourg, Grand-Duchy of Luxembourg
c. Principal Business: Fund Manager
d. Interest Held: 0% equity / 45% voting (indirectly as 100% owner of EQT Infrastructure IV (General Partner), S.à r.l. (#40) and EQT Saber Topside GP LLC (#38)).

EQT Holdings Infrastructure IV Coöperatief U.A. (#41) is directly owned by:

44. EQT Holdings B.V.

a. Jurisdiction of Formation: The Netherlands
b. Address: Cornelis Schuytstraat 74; 1071JL Amsterdam, The Netherlands
c. Principal Business: Investment Holding Vehicle
d. Interest Held: 0% equity / 42.71% voting (indirectly as 94.92% limited partner of EQT Infrastructure IV Coöperatief U.A. (#41)).

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[28] A U.A. entity is a Dutch cooperative association of members.

[29] A Luxembourg société à responsabilité limitée ("S.à r.l.") is most similar to a U.S. limited liability company.

No other entity or person holding an ownership interest in EQT Holdings Infrastructure IV Coöperatief U.A. (#41) holds a ten percent (10%) or higher ownership interest in Zayo.

EQT Holdings B.V. (#44), EQT Management S.à r.l. (#43) and EQT Fund Management S.à r.l. (#42) are 100% owned by:

45. EQT AB[30]

a. Jurisdiction of Formation: Sweden
b. Address: BOX 16409, 103 27 Stockholm, Sweden
c. Principal Business: Alternative Investments Group Holding Company
d. Interest Held: 0% equity / 45% voting (indirectly as 100% direct owner of EQT Fund Management S.à r.l. (#42); EQT Management S.à r.l. (#43), and EQT Holdings B.V (#44)).

EQT AB (#45) is publicly traded on the Stockholm, Nasdaq (ticker symbol: EQT) and is indirectly majority owned by its partners. No shareholders of EQT AB (#45) hold an indirect ten percent (10%) or higher ownership interest in Zayo.

[30] A Swedish Aktiebolag ("AB") is most similar to a U.S. corporation.

<u>Exhibit B</u>

Pre- and Post-Transaction Organizational Charts

Pre-Transaction Ownership Structure Charts

CHART 1

DIGITALBRIDGE STRUCTURE

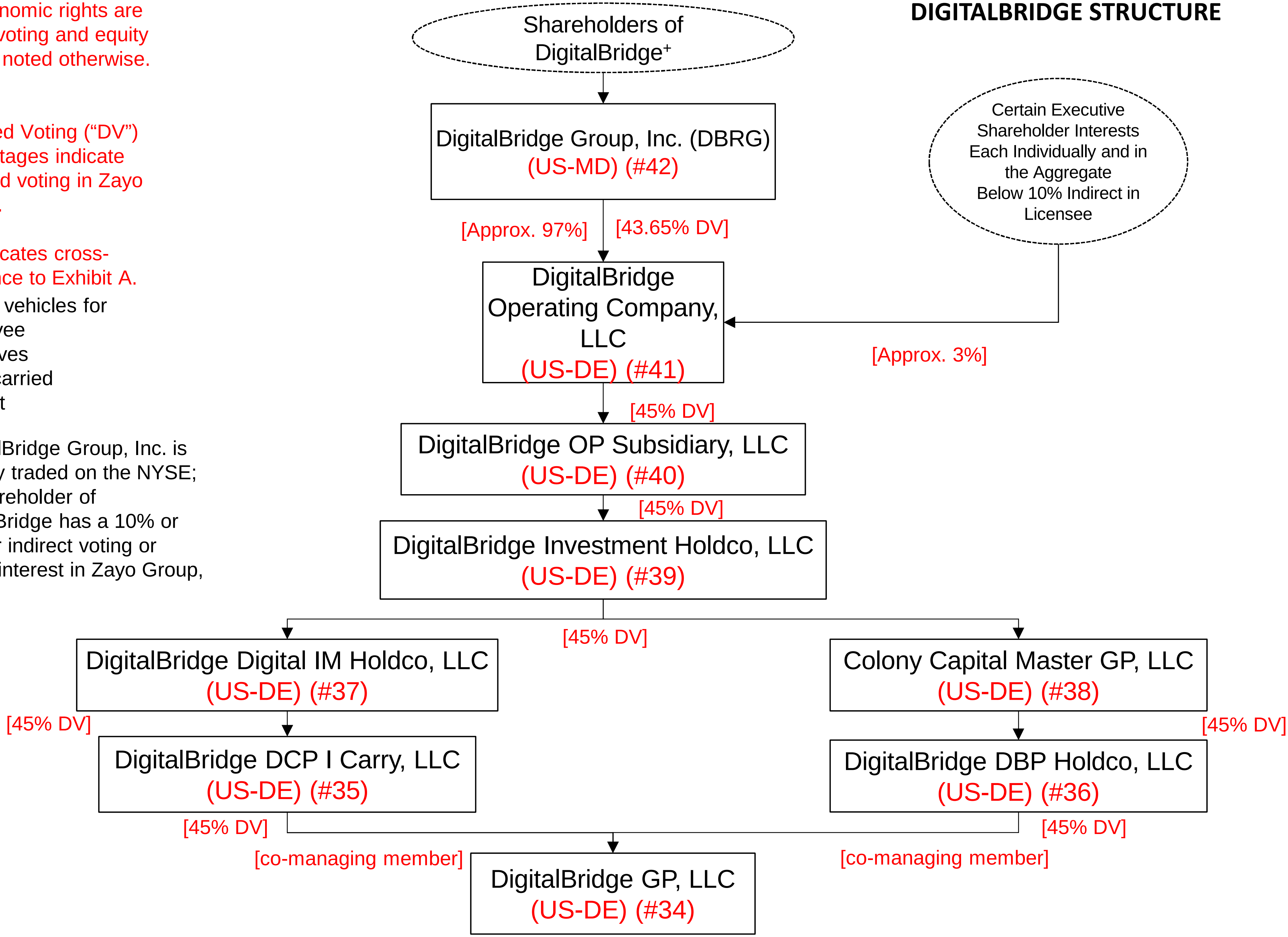
All economic rights are 100% voting and equity unless noted otherwise.

Deemed Voting ("DV") percentages indicate deemed voting in Zayo Parent.

(#) indicates cross-reference to Exhibit A.

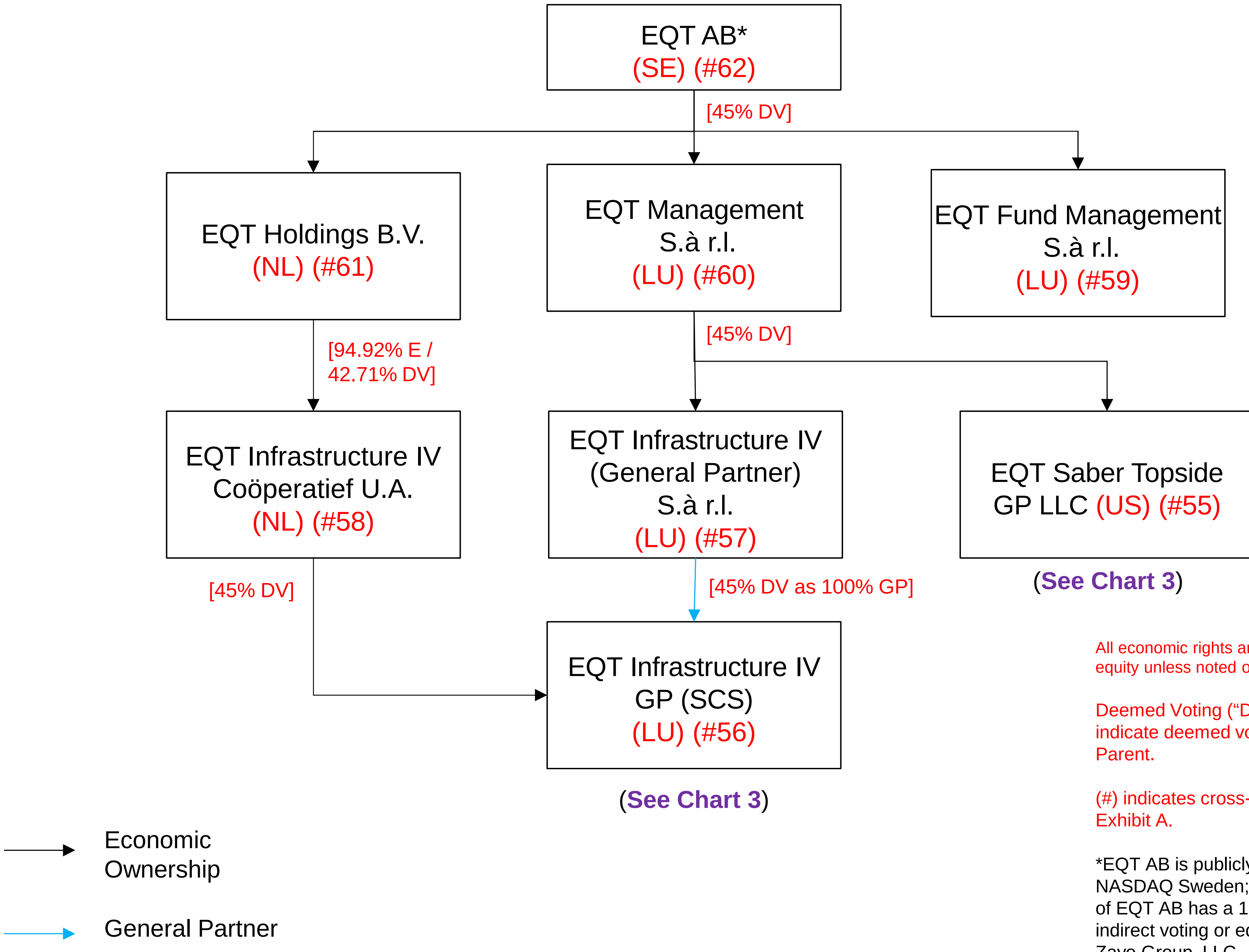
*Omits vehicles for employee Incentives plans/carried Interest

+DigitalBridge Group, Inc. is publicly traded on the NYSE; no shareholder of DigitalBridge has a 10% or greater indirect voting or equity interest in Zayo Group, LLC.



(See Chart 3)

CHART 2
EQT AB STRUCTURE



All economic rights are 100% voting and equity unless noted otherwise.

Deemed Voting ("DV") percentages indicate deemed voting in Zayo Parent.

(#) indicates cross-reference to Exhibit A.

*EQT AB is publicly traded on NASDAQ Sweden; no shareholder of EQT AB has a 10% or greater indirect voting or equity interest in Zayo Group, LLC.

CHART 3

FRONT RANGE JV, LP OWNERSHIP STRUCTURE

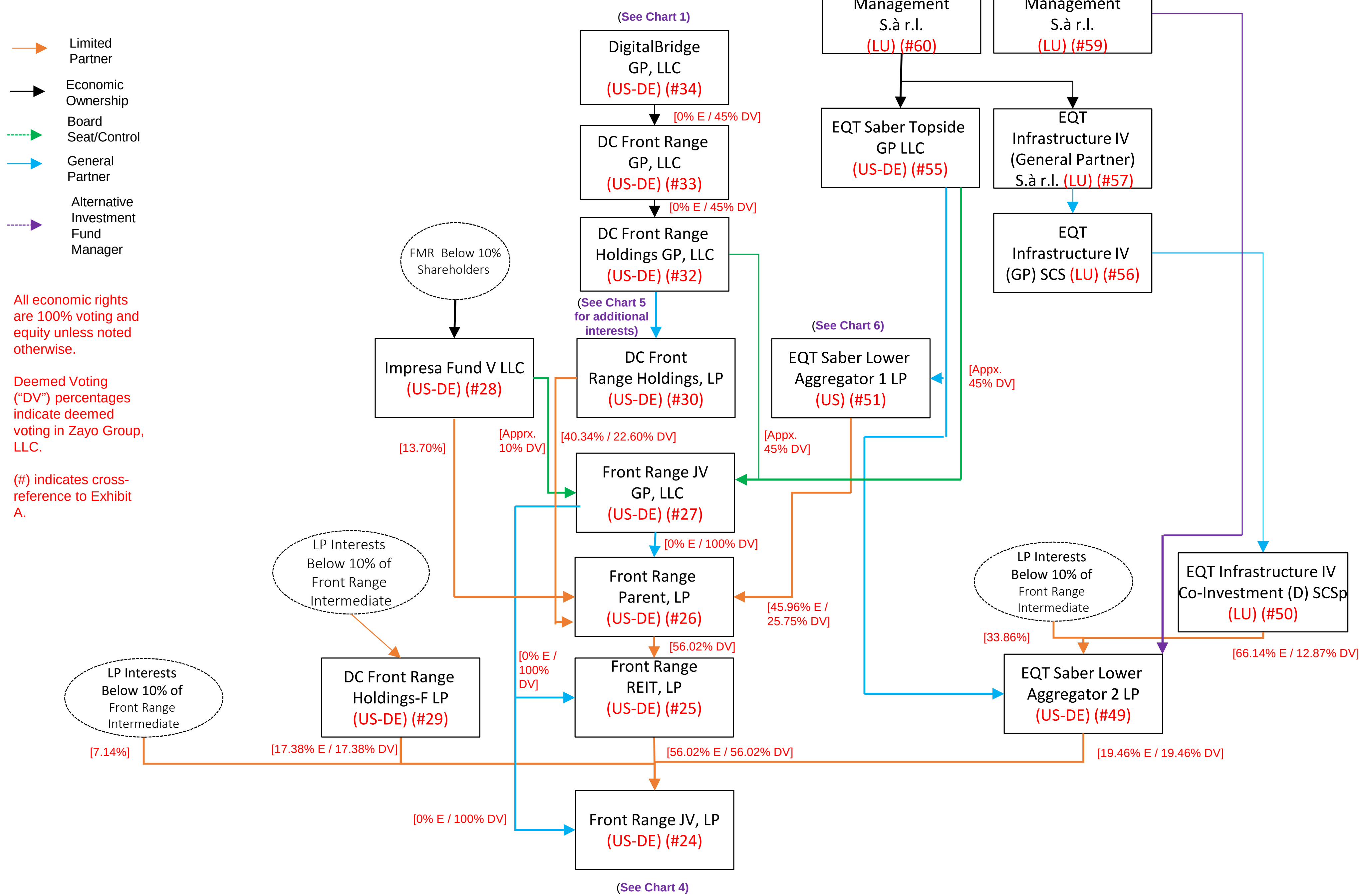
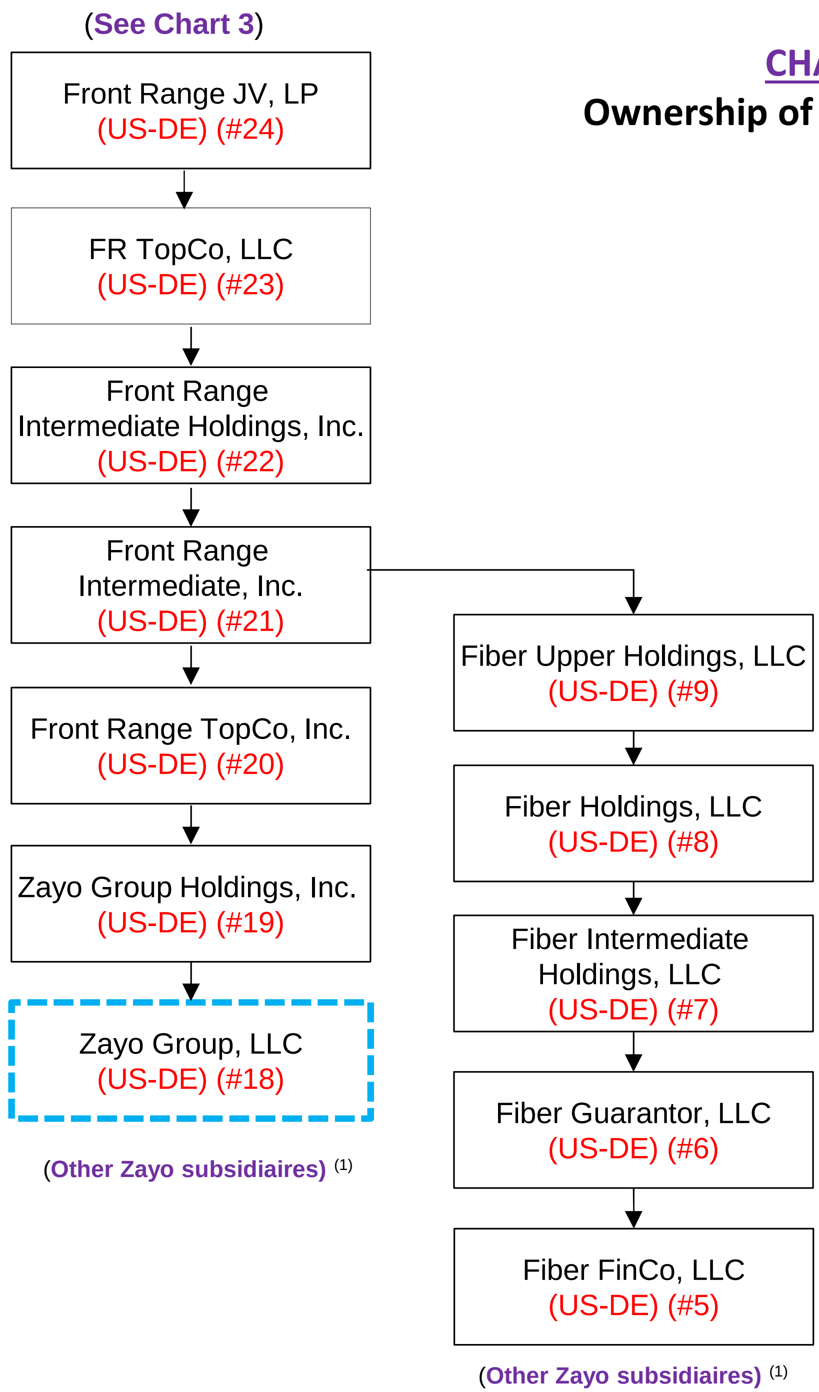


CHART 4
Ownership of Zayo Group, LLC



= AmeriCan-1 Licensee

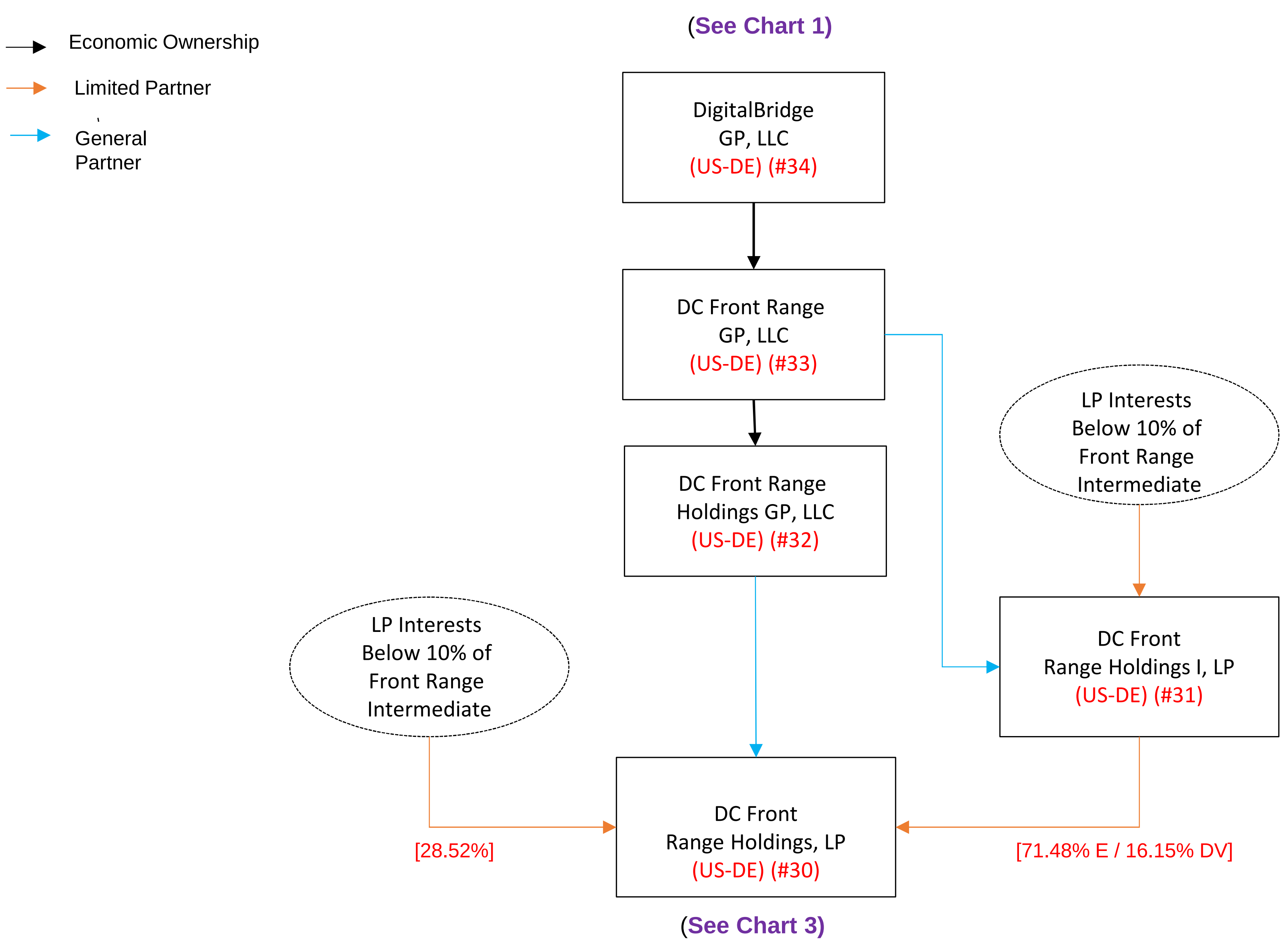
*All economic rights are 100% voting and equity unless noted otherwise.

(#) indicates cross-reference to Exhibit A.

(1) See ITC-T/C-20260304-0006 at Exhibit B for other Zayo subsidiaries

CHART 5

DC FRONT RANGE HOLDINGS, LP STRUCTURE



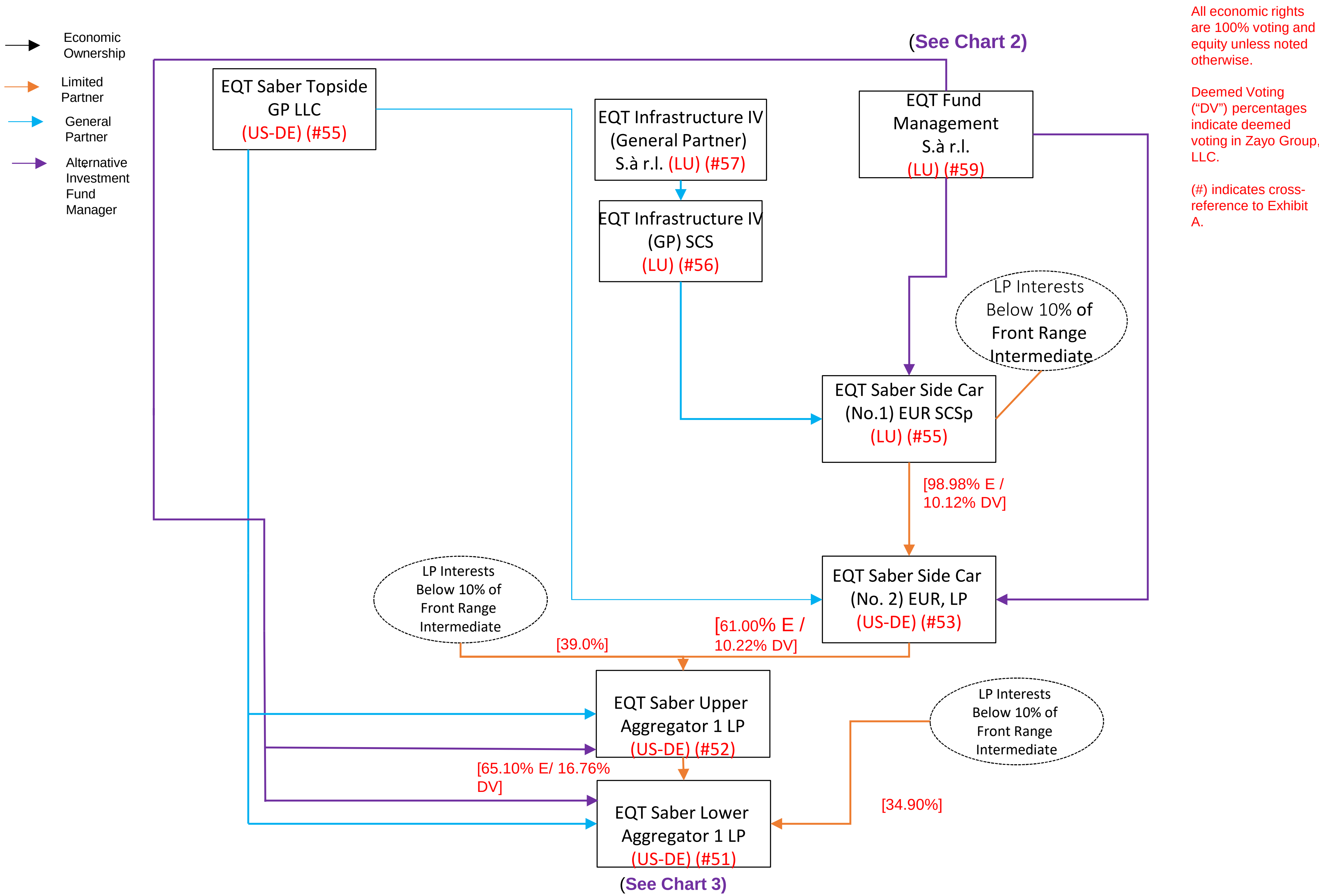
All economic rights are 100% voting and equity unless noted otherwise.

Deemed Voting ("DV") percentages indicate deemed voting in Zayo Group, LLC.

(#) indicates cross-reference to Exhibit A.

CHART 6

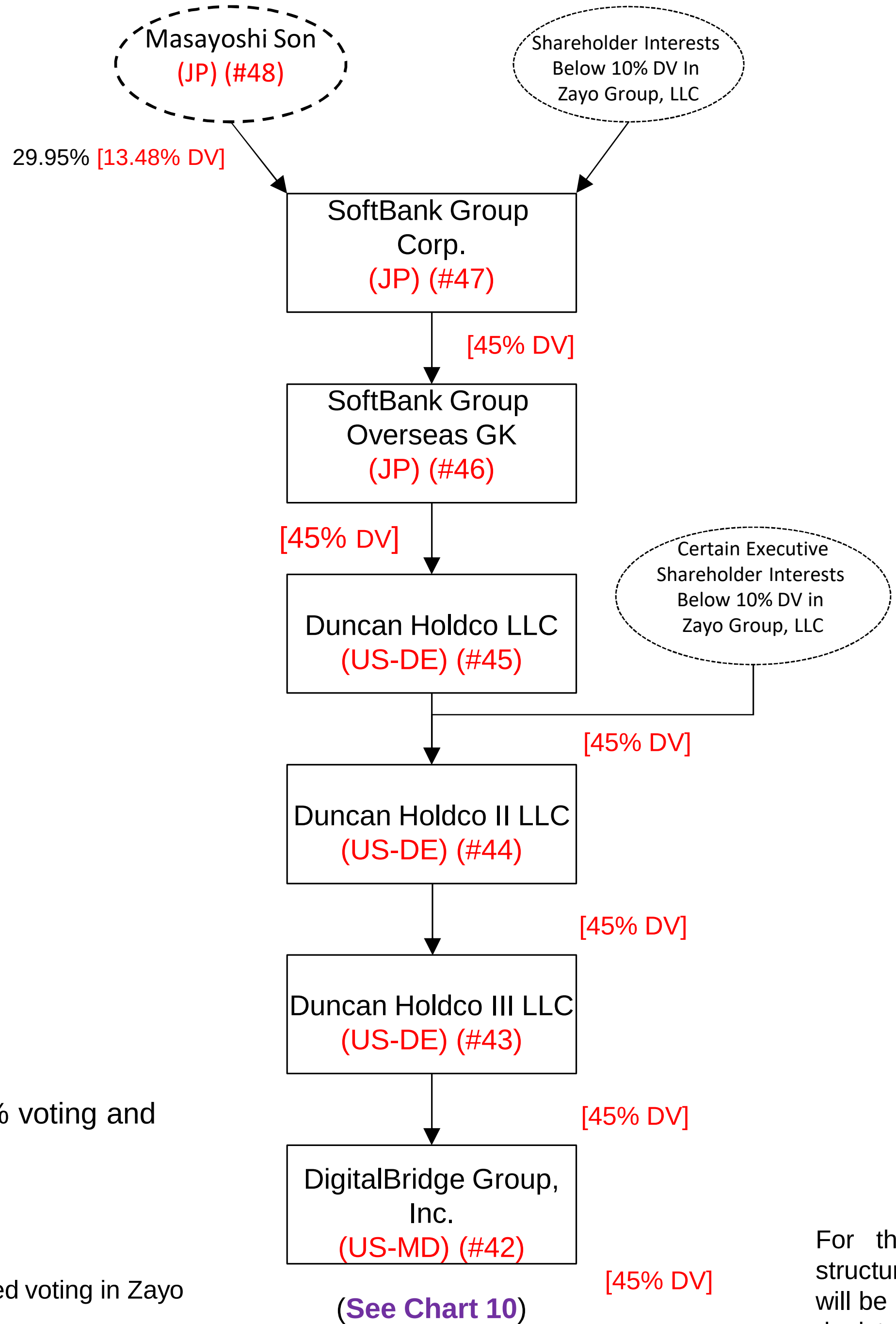
EQT SABER LOWER AGGREGATOR 1 LP STRUCTURE



Post-Transaction Ownership Structure Charts

CHART 9

OWNERSHIP STRUCTURE OF DIGITALBRIDGE BY SOFTBANK*



*All ownership/voting percentages are 100% voting and equity unless otherwise noted.

(#) indicates cross-reference to Exhibit A.

Deemed Voting ("DV") percentages indicate deemed voting in Zayo Group, LLC.

For the remainder of the Zayo ownership structure, please see charts 2-5 *supra*, as there will be no changes to those charts or the entities depicted therein as a result of the Proposed Transaction.

Exhibit C

Foreign Carrier Affiliates of Licensee[31]

Country(ies)	Affiliate Name	Description of the Company
Canada (WTO Member)	Zayo Canada Inc. (“Zayo Canada”) A Canadian entity	Zayo Canada is a direct, wholly owned subsidiary of Zayo. Zayo Canada holds a BITS License and Registrations as a Competitive Local Exchange Carrier, Non-Dominant Carrier, Reseller of Telecommunications Services, Reseller of High Speed Internet Service, and Digital Subscriber Line Provider in Canada.
Germany (WTO Members)	Zayo Group UK Limited (“Zayo-UK”) A UK entity	Zayo-UK is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-UK provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
	Zayo Infrastructure Deutschland GmbH (“ZI-Deutschland”) A German entity	ZI-Deutschland is an indirect, wholly owned subsidiary of FR TopCo, LLC. ZI-Deutschland provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
	Deutsche Glasfaser	Deutsche is an indirect, wholly owned subsidiary of FR TopCo, LLC. Deutsche Glasfaser deploys and operates fiber networks in Germany.
Ireland (WTO Member)	Emerald Bridge Fibres Limited (“Emerald Bridge”) An Irish Entity	Zayo Group UK Limited, which is an indirectly, wholly owned subsidiary of FR TopCo, LLC, directly owns 50% of Emerald Bridge. Emerald Bridge is registered as an Authorized Undertaking with the Commission for Communications Regulation in Ireland and provides a subsea cable service between Dublin, Ireland and Anglesea, Wales, UK.
	Zayo Infrastructure Ireland Ltd. (“ZI-Ireland”) An Irish entity	ZI-Ireland is an indirect, wholly owned subsidiary of FR TopCo, LLC. ZI-Ireland provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.

[31] Foreign carriers with which the Licensee would be affiliated following consummation of the Proposed Transaction are identified with an asterisk (“*”). SoftBank Corp. is an indirect subsidiary of SoftBank Group Corp. (“SoftBank”), which will be the ultimate indirect owner of Zayo at consummation of the Proposed Transaction. The other foreign carriers identified in this amended Exhibit C, are SoftBank subsidiaries, as well.

Country(ies)	Affiliate Name	Description of the Company
Belgium (WTO Member)	Zayo Infrastructure Belgium NV (“ZI-Belgium”) A Belgium entity	ZI-Belgium is an indirect, wholly owned subsidiary of FR TopCo, LLC. ZI-Belgium provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
	Fiberklaar	Fiberklaar deploys and operates fiber networks in Belgium.
France (WTO Member)	Zayo Infrastructure France SA (“ZI-France”) A French entity	ZI-France is an indirect, majority owned subsidiary of FR TopCo, LLC, with Allan Shaw and Sheldon Goldman each holding 1 share of the company. FR TopCo, LLC indirectly holds all the remaining shares in the company. ZI-France provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Netherlands (WTO Member)	Zayo Infrastructure Nederland B.V. (“ZI-Nederland”) A Dutch entity	ZI-Nederland is an indirect, wholly owned subsidiary of FR TopCo, LLC. ZI-Nederland provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
	DeltaFiber	DELTA Fiber, an EQT portfolio company, provides competitive high-speed broadband, TV and fixed telephony to households and businesses in the Netherlands.
Switzerland (WTO Member)	Zayo Infrastructure Switzerland AG (“ZI-Switzerland”) A Swiss entity	ZI-Switzerland is an indirect, wholly owned subsidiary of FR TopCo, LLC. ZI-Switzerland provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Singapore (WTO Member)	Zayo Singapore Pte. Ltd. (“Zayo-Singapore”) A Singaporean entity	Zayo-Singapore is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-Singapore provides lit services, colocation and related services and holds a Service Based Operator (Individual) license.
	BBIX Singapore Pte. Ltd.*	BBIX Singapore Pte. Ltd. is a SoftBank subsidiary that provides internet access services, international transport services, and related interconnection services.
	SB Telecom Singapore Pte. Ltd.*	SB Telecom Singapore Pte. Ltd. is a SoftBank subsidiary that provides international transport services, managed network services, and enterprise communications services.

Country(ies)	Affiliate Name	Description of the Company
Hong Kong (WTO Member)	Zayo Group (HK) Limited (“Zayo-HK”) A Hong Kong entity	Zayo-HK is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-HK provides lit services, colocation and related services and holds a Service Based Operator (IVANS and Internet Access) license.
	BBIX Hong Kong Pte. Limited*	BBIX Hong Kong Pte. Limited is a SoftBank subsidiary that provides internet access services, international transport services, and related interconnection services.
Australia (WTO Member)	Zayo Group Australia Pty. Ltd. (“Zayo-Au”) An Australian entity	Zayo-Australia is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo Australia provides lit services, colocation and related services.
Spain (WTO Member)	Zayo Infrastructure Spain, S.L. (“Zayo-Spain”) A Spanish entity	Zayo-Spain is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-Spain holds a registration as an Electronic Communications Network Provider and Electronic Communications Service Provider with the “National Commission of Markets and Competition
Italy (WTO Member)	Zayo Italy S.r.l. (“Zayo-Italy”) An Italian entity	Zayo-Italy is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-Italy holds a registration as an Electronic Communications Network Provider and Electronic Communications Service Provider with the Italian Ministry of Economic Development.
South Africa (WTO Member)	Zayo Group South Africa (PTY) Ltd. (“Zayo-SA”)	Zayo-SA is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-SA obtained an exemption from licensing requirements but provides resold lit services, colocation and related services.
Mexico (WTO Member)	Zayo Infrastructure Mexico, S. de R.L. de C.V. (“Zayo Mexico”)	Zayo Mexico is a direct, majority owned (99.9%) subsidiary of Zayo. Zayo Mexico holds single Concession for Commercial Use (Concesión Única para Uso Comercial) to provide Public Telecommunications and Broadcasting Services in Mexico.
United Kingdom (WTO Member)	Fibrespeed Limited (“Fibrespeed”)	Fibrespeed is an indirect, wholly owned subsidiary of FR TopCo, LLC. Fibrespeed provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.

Country(ies)	Affiliate Name	Description of the Company
	Zayo Group UK Limited ("Zayo-UK") A UK entity	Zayo-UK is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-UK provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Japan (WTO Member)	Zayo Japan K.K. ("Zayo Japan")	Zayo Japan is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo Japan provides internet access service, FTTH access service, IP-VPN service, wide area Ethernet service, domestic/international dedicated circuit service, and other internet-related services (e.g., DDOS protection) for domestic and international telecommunications services.
	SoftBank Corp.*	SoftBank Corp., an indirect subsidiary of SoftBank, provides internet access service, mobile communications, and other internet-related services. In addition, SoftBank Corp. owns and controls submarine cable stations at Maruyama, Kitakyushu, and Miura in Japan.
	BB Backbone Corporation*	BB Backbone Corporation is a SoftBank subsidiary that provides dark fiber capacity, high-capacity spectrum-based connectivity, and private wireless network services.
	Wireless City Planning Inc.*	Wireless City Planning Inc. is a SoftBank subsidiary that provides wireless broadband services, including network connectivity delivered as a Mobile Virtual Network Operator ("MVNO") under the SoftBank brand.
Sweden (WTO Member)	Global Connect	GlobalConnect, an EQT portfolio company, provides communication infrastructure across Sweden, Norway, Denmark, Finland and Northern Germany for enterprise customers, and under the brands of IP-Only in Sweden, Homenet in Norway and Onefiber in Denmark provides fiber network and services to urban and rural single family homes and multi-dwelling units in Sweden, Norway and Denmark.
	Zayo Infrastructure Sweden AB ("Zayo-Sweden") A Swedish entity	Zayo-Sweden is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-Sweden provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.

Country(ies)	Affiliate Name	Description of the Company
	Zayo Group UK Limited (“Zayo-UK”) A UK entity	Zayo-UK is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-UK provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Poland **(WTO Member)**	Zayo Group UK Limited (“Zayo-UK”) A UK entity	Zayo-UK is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-UK provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Romania **(WTO Member)**	Zayo Infrastructure France SA (“Zayo-France”) A French entity	Zayo-France is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-France provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Norway **(WTO Member)**	Zayo Group UK Limited (“Zayo-UK”) A UK entity	Zayo-UK is an indirect, wholly owned subsidiary of FR TopCo, LLC. Zayo-UK provides dedicated fiber networks primarily used for data services, lit services, and access to network facilities.
Malta **(WTO Member)**	Melita	Melita, an EQT portfolio company, provides high speed Internet, High-Definition Digital Television, Fixed Telephony and 5G Mobile to consumers and businesses in Malta
China **(WTO Member)**	SBTM Online (Suzhou) Co., Ltd.*	SBTM Online (Suzhou) Co., Ltd. is a SoftBank subsidiary that provides international transport and managed network services.
	SB Telecom China (Shanghai) Co., Ltd.*	SB Telecom China (Shanghai) Co., Ltd. is a SoftBank subsidiary that provides international transport and managed network services.
Thailand **(WTO Member)**	SB Telecom (Thailand) Co., Ltd.*	SB Telecom (Thailand) Co., Ltd. is a SoftBank subsidiary that provides international transport and managed network services.

Certification

On behalf of Zayo Group, LLC ("Zayo"), I certify that all of the information contained in this Joint Application for Authority to Transfer Indirect Control of Cable Landing License Authorization of Zayo Pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (1994), Executive Order No. 10530, Exec. Ord. No. 10530 reprinted as amended in 3 U.S.C. § 301, and Sections 1.767 and 1.70000 et seq. of the Rules of the Federal Communications Commission ("Commission"), 47 C.F.R. §§ 1.767, 1.70000 et seq., and the Exhibits attached are true and correct to the best of my knowledge and belief.

Pursuant to 47 CFR § 63. l 8(q). I also certify that Zayo agrees:

1. To comply with all applicable Communications Assistance for Law Enforcement Act (CALEA) requirements and related rules and regulations, including any and all Commission orders and opinions governing the application of CALEA, pursuant to the Communications Assistance for Law Enforcement Act and the Commission's rules and regulations in Title 47, chapter 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 U.S. law, including but not limited to:
    a. The Wiretap Act. 18 U.S.C. § 2510 et seq.;
    b. The Stored 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 court orders. subpoenas or other legal process;

3. To designate a point of contact, who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;

4. That Zayo 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 an application is pending;

5. That after the application is no longer pending for purposes of section 1.65 of the Commission's rules, Zayo 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 Zayo understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in section 63.18(q) of the Commission's rules or in the grant of an application or authorization and/or that 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.

Executed: April 21, 2026

Lauren Lantero
Chief Legal Officer
Zayo Group, LLC

Certification

On behalf of DigitalBridge Group, Inc. ("DigitalBridge"), I certify that all of the information contained in this Joint Application for Authority to Transfer Indirect Control of Cable Landing License Authorization of Zayo Pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (1994), Executive Order No. 10530, Exec. Ord. No. 10530 reprinted as amended in 3 U.S.C. § 301, and Sections 1.767 and 1.70000 et seq. of the Rules of the Federal Communications Commission ("Commission"), 47 C.F.R. §§ 1.767, 1.70000 et seq., and the Exhibits attached are true and correct to the best of my knowledge and belief.

Pursuant to 47 CFR § 63. 1 8(q). I also certify that DigitalBridge agrees:

1. To comply with all applicable Communications Assistance for Law Enforcement Act (CALEA) requirements and related rules and regulations, including any and all FCC orders and opinions governing the application of CALEA, pursuant to the Communications Assistance for Law Enforcement Act and the Commission's rules and regulations in Title 47, chapter 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 USlaw, including but not limited to:
   a. The Wiretap Act. 18 U.S.C. § 2510 et seq.;
   b. The Stored 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 court orders. subpoenas or other legal process;

3. To designate a point of contact, who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;

4. That DigitalBridge 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 an application is pending;

5. That after the application is no longer pending for purposes of section 1.65 of the Commission's rules, DigitalBridge 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 DigitalBridge understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in section 63.18(q) of the Commission's rules or in the grant of an application or authorization and/or that 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.

Executed: April 21, 2026

Geoffrey Goldschein
Chief Legal Officer
DigitalBridge Group, Inc.

Certification

On behalf of Duncan Holdco LLC ("Duncan") and its subsidiaries and affiliates, I certify that all of the information contained in this Joint Application for Authority to Transfer Indirect Control of the Cable Landing License Authorization of Zayo Group, LLC Pursuant to the Act Relating to the Landing and Operation of Submarine Cables in the United States, 47 U.S.C. §§ 34-39 (1994), Executive Order No. 10530, Exec. Ord. No. 10530 *reprinted as amended* in 3 U.S.C. § 301, and Sections 1.767 and 1.70000 *et seq.* of the rules of the Federal Communications Commission ("Commission"), 47 C.F.R. §§ 1.767, 1.70000 *et seq.*, and the Exhibits attached as they pertain to Duncan, its indirect corporate parent SoftBank Group Corp. ("SoftBank"), and Duncan's and SoftBank's affiliates are true and correct to the best of my knowledge and belief.

Pursuant to 47 CFR § 63.18(q), I also certify that Duncan agrees:

1. To comply with all applicable Communications Assistance for Law Enforcement Act ("CALEA") requirements and related rules and regulations, including any and all Federal Communications Commission ("FCC") orders and opinions governing the application of CALEA, pursuant to CALEA and the Commission's rules and regulations in 47 C.F.R 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 U.S. law, including but not limited to:

    a. The Wiretap Act. 18 U.S.C. § 2510 *et seq.*;
    b. The Stored 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 court orders. subpoenas or other legal process;

3. That it has designated a point of contact who is located in the United States and is a U.S. citizen or lawful U.S. permanent resident, for the execution of lawful requests and as an agent for legal service of process;

4. That Duncan 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's") request, as required under section 1.65(a) of the Commission's rules, and that it will 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(a) of the Commission's rules, it 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 Duncan understands that if it fails to fulfill any of the conditions and obligations set forth in the certifications set out in section 63.18(q) of the Commission's rules or in the grant of an application or authorization and/or that 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.

Executed: April 21, 2026

Varun Aravapally
Director
Duncan Holdco LLC