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October 21, 2026

Via E-Filing

Leah Mohr, Executive Director
South Dakota Public Utilities Commission
Capitol Building, First Floor
500 East Capital Avenue
Pierre, South Dakota 57501-5070

Re: Notification of Fiber AssetCo LLC Regarding a *Pro Forma* Restructuring of Fiber AssetCo LLC

Dear Director Mohr:

By this letter, Fiber AssetCo LLC ("Fiber AssetCo") notifies the South Dakota Public Utilities Commission (the "Commission") of a *pro forma* change in Fiber AssetCo's ownership structure (the "*Pro Forma* Restructuring").

Fiber AssetCo respectfully submits that Commission approval is not required for the *Pro Forma* Restructuring.[1] In support of this Notification, Fiber AssetCo provides the following information:

Description of Fiber AssetCo LLC

Fiber AssetCo is a Delaware limited liability company with its principal office at 1401 Wynkoop Street, Suite 500, Denver, CO 80202. In South Dakota, Fiber AssetCo is authorized by the Commission to provide resold and facilities-based competitive local exchange and interexchange telecommunications services, granted in Docket No. TC25-011 on August 15, 2025.

Fiber AssetCo currently is a direct, wholly owned subsidiary of Fiber NewCo LLC ("NewCo"), which, in turn, is an indirect wholly owned subsidiary of Front Range Intermediate, Inc. ("Front Range Intermediate"), of which the Commission was notified on February 26, 2026. Front Range Intermediate also indirectly, wholly owns Zayo Group, LLC ("Zayo Group")[2] and its subsidiaries,

[1] Fiber AssetCo submits this notification in accordance with S.D.C.L. § 49-31-20, which requires notification to the Commission of "any consolidation or merger or transfer of stock or other ownership interests that will result in a different person then owning more than fifty percent of the company's stock or ownership interests."

[2] In South Dakota, Zayo Group is authorized by the Commission to provide (1) competitive local exchange telecommunications services, originally granted in Docket No. TC06-063 on September 11, 2006, and (2) interexchange telecommunications services, originally granted in Docket No. TC00-079 on August 25, 2000. The Certificates were originally granted to 360networks (USA) Inc. ("360networks") (formerly known as Worldwide Fiber Networks, Inc.). Subsequently, in Docket No. TC12-191 on March 1, 2013, the Commission approved the

including Zayo Issuer.[3] Front Range Intermediate, in turn, is indirectly, wholly owned by Front Range JV, LP ("JV LP"), a Delaware limited partnership that is controlled by its general partner, Front Range JV GP, LLC ("JV GP").[4]

Fiber AssetCo and its affiliates are 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. Fiber AssetCo's customers consist primarily of wireless service providers, national and regional communications service providers, media, Internet, and content companies, government agencies, banks, and other bandwidth-intensive enterprises.

Designated Contacts

Questions, correspondence, or other communications concerning this filing should be directed to:

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With a copy to:

Lauren Lantero
Zayo Group, LLC
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Description of the *Pro Forma* Restructuring

The *Pro Forma* Restructuring involves a series of intra-company transactions that will result in a change in the direct and indirect ownership and control of Fiber AssetCo without any change to its ultimate ownership and control. Specifically, upon completion of the *Pro Forma* Restructuring, Fiber AssetCo will no longer be a direct, wholly owned subsidiary of NewCo and instead will be an indirect, wholly owned subsidiary of Zayo Group and a direct, wholly owned subsidiary of Zayo Issuer. Fiber AssetCo will remain an indirect, wholly owned subsidiary of Front Range Intermediate. A chart illustrating the pre- and post-*Pro Forma* Restructuring ownership structure of Fiber AssetCo is included as **Exhibit A**.

As noted, the *Pro Forma* Restructuring will not result in any changes to the ultimate ownership or control of Fiber AssetCo and Fiber AssetCo will continue to conduct its operations and provide its

transfer of 360networks' Certificates to Zayo Group. The *Pro Forma* Restructuring will not result in a change to the direct or indirect ownership or control of Zayo Group.

[3] Zayo Issuer directly and wholly owns Zayo Network Services, LLC ("Zayo-NS"). In South Dakota, Zayo-NS is authorized to provide (1) competitive local exchange telecommunications services, granted in Docket No. TC25-032 on October 8, 2025, and (2) interexchange telecommunications services, granted in Docket No. TC25-033 on October 9, 2025. The *Pro Forma* Restructuring will not result in a change to the direct or indirect ownership or control of Zayo-NS.

[4] Additional information regarding the direct and indirect ownership and control of Fiber AssetCo and its owners is a matter of public record in a notification submitted to the Commission on March 18, 2026 regarding an unrelated transaction.

services as it does currently. As such, Fiber AssetCo's customers will not be impacted by these changes.

Public Interest Considerations

The *Pro Forma* Restructuring is in the public interest. The *Pro Forma* Restructuring seeks to adjust the corporate structure for administrative and operational efficiencies as well as to integrate Fiber AssetCo into the larger financial structure of Zayo. The *Pro Forma* Restructuring involves only a change in the direct and intermediate holding company structure of Fiber AssetCo. The *Pro Forma* Restructuring will not change day-to-day working control of Fiber AssetCo, which will continue to be overseen by its existing management team. After the *Pro Forma* Restructuring, Fiber AssetCo will remain technically and managerially qualified to provide competitive telecommunications services in the State of South Dakota. Fiber AssetCo's operations will be directed by the existing corporate management, technical, and operations staffs responsible for the operations of Fiber AssetCo today. Thus, there will be no impact on the employees of Fiber AssetCo, and Fiber AssetCo will continue to possess the requisite resources to provide high-quality telecommunications services in South Dakota.

The *Pro Forma* Restructuring also will be invisible to customers and will not result in any change to their services. The telecommunications services provided by Fiber AssetCo and the rates, terms and conditions of those services will not change as a result of the *Pro Forma* Restructuring, and Fiber AssetCo's South Dakota customers will not be affected in any way by the *Pro Forma* Restructuring. Accordingly, there will be no impact on Fiber AssetCo's provision of safe and adequate utility service at just and reasonable rates. The above facts demonstrate that the *Pro Forma* Restructuring is in the public interest.

Conclusion

For the foregoing reasons, Fiber AssetCo submits that the public interest, convenience, and necessity would be furthered by the *Pro Forma* Restructuring.

We would appreciate acknowledgment of receipt and acceptance of this filing, which is being submitted via e-Filing. Should you have any questions concerning this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Patricia Cave
Patricia Cave
Joshua M. Bobeck
Micah A. Leval

Counsel for Fiber AssetCo LLC

EXHIBIT A

Current and Post-*Pro Forma* Restructuring Ownership Structure Charts

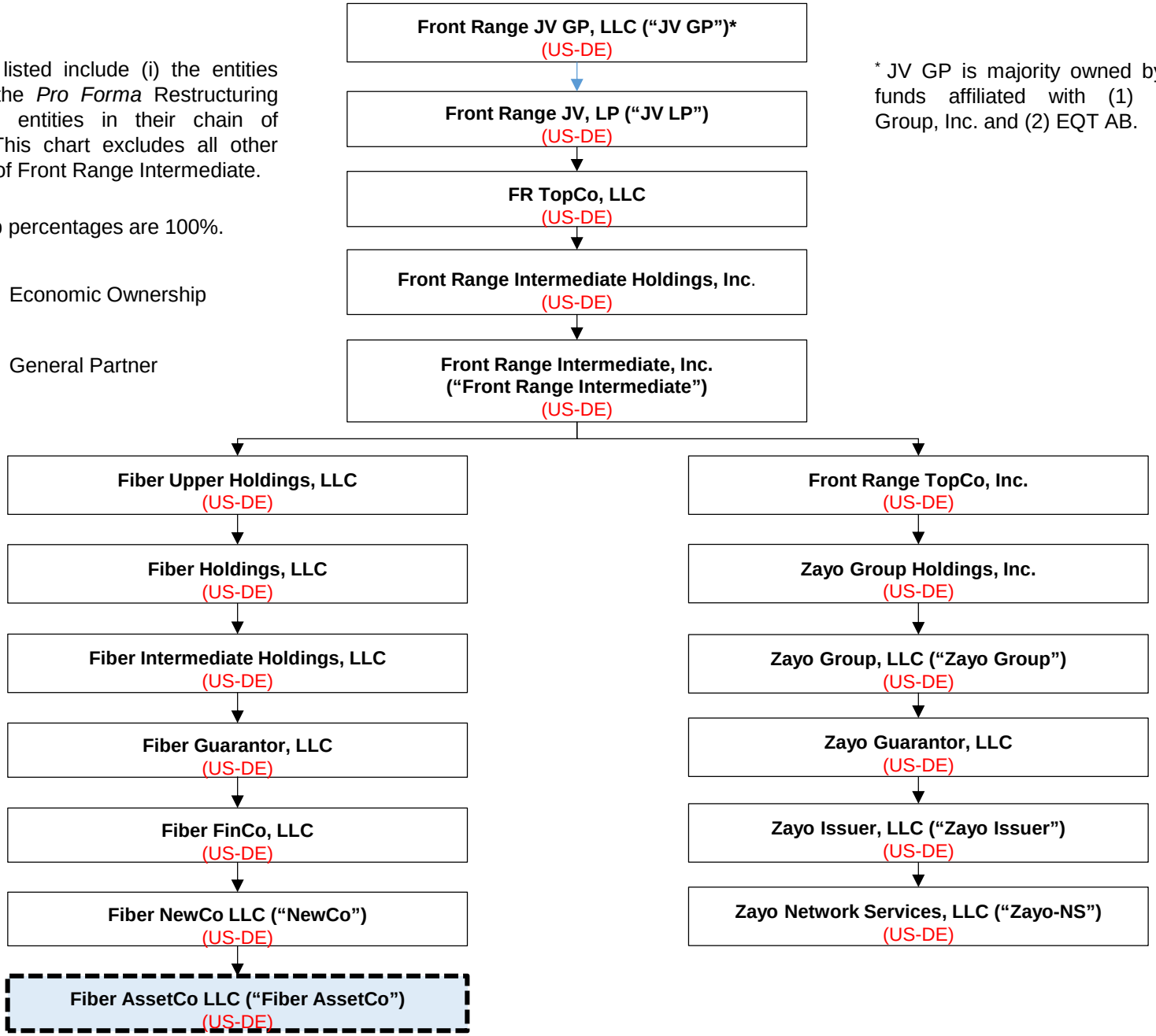
Current Ownership Structure of Fiber AssetCo LLC

The entities listed include (i) the entities involved in the *Pro Forma* Restructuring and (ii) the entities in their chain of ownership. This chart excludes all other subsidiaries of Front Range Intermediate.

All ownership percentages are 100%.

→ Economic Ownership

→ General Partner



* JV GP is majority owned by investment funds affiliated with (1) DigitalBridge Group, Inc. and (2) EQT AB.

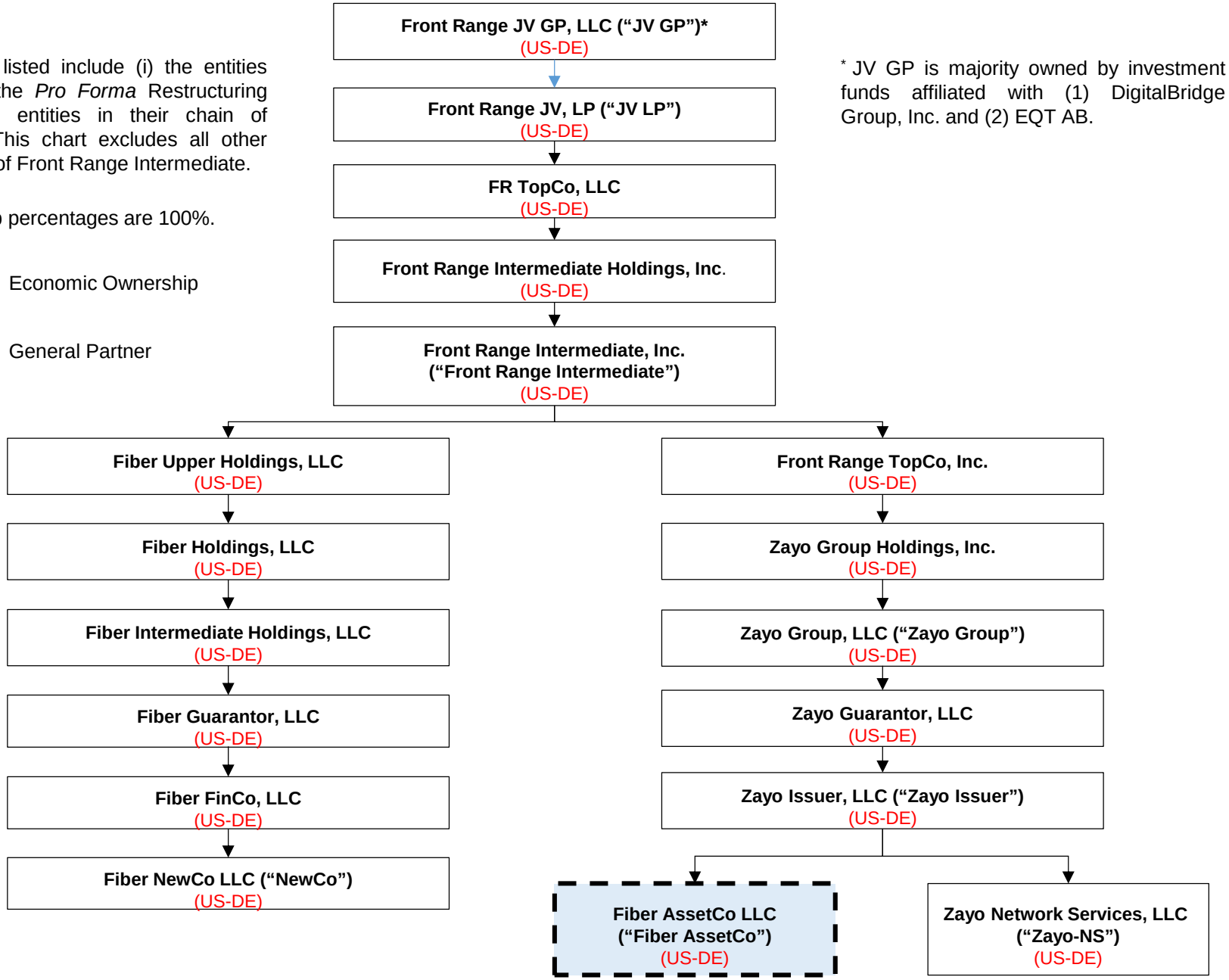
Post-*Pro Forma* Restructuring Ownership Structure of Fiber AssetCo LLC

The entities listed include (i) the entities involved in the *Pro Forma* Restructuring and (ii) the entities in their chain of ownership. This chart excludes all other subsidiaries of Front Range Intermediate.

All ownership percentages are 100%.

→ Economic Ownership

→ General Partner



* JV GP is majority owned by investment funds affiliated with (1) DigitalBridge Group, Inc. and (2) EQT AB.

VERIFICATION

I, Lauren Lantero, state that I am Chief Legal Officer and Secretary of Fiber AssetCo LLC (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents thereof and the certifications contained therein with respect to the Company are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the forgoing is true and correct. Executed this 21st day of October, 2026.



Lauren Lantero
Chief Legal Officer and Secretary
Fiber AssetCo LLC