

Exhibit 2

Responses to Interexchange Rules

As explained in the Application, Applicant seeks statewide authority to provide interexchange services.

South Dakota Administrative Rules Section 20:10:24:02(1)

The applicant's name, address, telephone number, facsimile number, web page URL, and E-mail address;

Applicant's legal name is Fiber AssetCo LLC, and its address is:

Fiber AssetCo LLC
8020 Katy Freeway
Houston, TX 77024
Tel: (877) 486-9377
PUC.Correspondence@crowncastle.com
Website: www.CrownCastle.com

South Dakota Administrative Rules Section 20:10:24:02(2)

A description of the legal and organizational structure of the applicant's company;

Applicant is a Delaware limited liability company formed on April 30, 2025. Applicant's sole member is Fiber NewCo LLC, a Delaware limited liability company with its sole member being Crown Castle Fiber LLC ("CCF"). CCF is an indirect, wholly owned subsidiary of Crown Castle Inc. ("CCI"), a publicly traded corporation (NYSE: CCI) that is incorporated under the laws of the State of Delaware. Copies of Applicant's formation documents, and organizational structure chart were provided as **Exhibit A** and **Exhibit B**, respectively, in its Application dated June 12, 2025 filed in Docket No. TC25-011.

The Application was filed in connection with a larger transaction whereby, in part, certain fiber assets and customers will be transferred from CCF to Fiber AssetCo. The transfer of certain fiber assets will be undertaken to separate CCF's fiber and small cells businesses in connection with a larger transaction whereby a subsidiary of Front Range Intermediate, Inc. ("Zayo Parent," the indirect parent of Zayo Group, LLC) will acquire Fiber AssetCo and a subsidiary of the EQT

Active Core Infrastructure Fund will acquire CCF. Pursuant to the June 12, 2025 Application, prior notice was provided to the Commission concerning the proposed the transfer of certain fiber assets, including customer contracts, from CCF to Fiber AssetCo pursuant to S.D. Codified Laws § 49-31-59.

South Dakota Administrative Rules Section 20:10:24:02(3)

The name under which applicant will provide interexchange services if different than in subdivision (1) of this section;

Applicant will provide service in South Dakota under its legal name identified in subdivision (1) of this section, Fiber AssetCo LLC.

South Dakota Administrative Rules Section 20:10:24:02(4)

A copy of the applicant's certificate of authority to transact business in South Dakota from the Secretary of State;

A copy of Applicant's Certificate of Authority to transact business as a foreign limited liability company in South Dakota was attached as **Exhibit C** in the Application dated June 12, 2025 filed in Docket No. TC25-011.

South Dakota Administrative Rules Section 20:10:24:02(5)

The location of the applicant's principal office, if any, in this state and the name and address of its current registered agent, if applicable;

Applicant does not maintain an office or personnel within the State of South Dakota. Responsibility for South Dakota operations will be handled by Applicant's management team from its Houston, Texas location. Applicant's registered agent in South Dakota is:

C T Corporation System
319 South Coteau Street
Pierre, South Dakota 57501

South Dakota Administrative Rules Section 20:10:24:02(6)

A list and specific description of the telecommunications services the applicant intends to offer;

Applicant's business is building communications solutions for enterprise and carrier customers individually for each project's needs. Applicant seeks to provide interexchange services primarily to wholesale customers (*e.g.*, other carriers) and customers in government, health care, education, financial services, and other enterprises, primarily providing facilities-based Private Line, Ethernet, and Wavelength services. Applicant does not intend to provide service to residential customers and does not intend to provide traditional switched local exchange, interexchange, voice or switched access services.

South Dakota Administrative Rules Section 20:10:24:02(7)

A detailed statement of how the applicant will provide its services;

Applicant will primarily provide services using its own facilities, which will be assigned from CCF, and facilities leased from other carriers, but also seeks authority to provide service for resale. Applicant intends to provide its services using fiber optic cable, along with other equipment and facilities, to originate, terminate, and amplify signals. Applicant does not have plans to deploy specific facilities in South Dakota at this time. Applicant plans to begin providing telecommunications services in South Dakota after it has obtained the requisite Certificate of Authority.

South Dakota Administrative Rules Section 20:10:24:02(8)

A service area map or narrative description indicating with particularity the geographic area proposed to be served by the applicant;

Applicant seeks authority to provide its services throughout the State of South Dakota. Accordingly, a map of Applicant's proposed service area is not attached.

South Dakota Administrative Rules Section 20:10:24:02(9)

For the most recent 12 month period, financial statements of the applicant including a balance sheet, income statement, and cash flow statement. The applicant shall provide audited financial statements, if available;

Applicant possesses the requisite financial resources to provide telecommunications services in South Dakota. As a newly formed company, Applicant does not have historical financial statements. For purposes of the Application, Applicant relied on the financial statements of CCI to demonstrate Applicant's financial qualification to operate within South Dakota. The most recent annual consolidated financial statements of CCI were provided as **Exhibit E** in the Application dated June 12, 2025 filed in Docket No. TC25-011. As shown in these documents, Applicant has sufficient capital resources and is financially qualified to operate within the State of South Dakota.

South Dakota Administrative Rules Section 20:10:24:02(10)

The names, addresses, telephone number, facsimile number, E-mail address, and toll free number of the applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters and a description of how the applicant handles customer service matters;

Correspondence concerning the Application should be directed to Applicant's counsel:

Russell M. Blau
Danielle Burt
Leetal Weiss
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave., N.W.
Washington, D.C. 20004
202-739-3000 (tel)
202-739-3001 (fax)
russell.blau@morganlewis.com
danielle.burt@morganlewis.com
leetal.weiss@morganlewis.com

with a copy to

Edward B. Adams, Jr.
Executive Vice President and General Counsel
Crown Castle Inc.
8020 Katy Freeway
Houston, TX 77024
Tel: (877) 486-9377 or (713) 570-3000
PUC.Correspondence@crowncastle.com

Following grant of the Application, the Commission should direct all correspondence regarding customer complaints and other regulatory matters to:

Deborah Kelly
2000 Corporate Drive
Canonsburg, PA 15317
Tel: 724-416-2686
Fax: 724-416-6473
deborah.kelly@crowncastle.com

Applicant's primary point of contact for customer service is:

Rebecca Hussey
Associate General Counsel
2000 Corporate Drive
Canonsburg, PA 15317
Tel: 614-657-4294
rebecca.hussey@crowncastle.com

South Dakota Administrative Rules Section 20:10:24:02(11)

Information concerning how the applicant plans to bill and collect charges from customers;

Applicant will bill its customers directly for the proposed telecommunications services, typically on a monthly basis. Applicant's name shall appear on customer's monthly bills and invoices. Bills will be presented in paper or electronic format, and will identify individual state and federal taxes, surcharges, and fees, as appropriate. All applicable taxes and surcharges will be collected and remitted to the proper authorities.

South Dakota Administrative Rules Section 20:10:24:02(12)

Information concerning the applicant's policies relating to solicitation of new customers and a description of the efforts the applicant shall use to prevent the unauthorized switching of interexchange customers;

Applicant intends to solicit customers for its telecommunications services from its existing customer base and through business-to-business marketing. Applicant does not intend to provide switched voice services, and therefore, anti-slamming measures are not applicable to Applicant.

South Dakota Administrative Rules Section 20:10:24:02(13)

Information concerning how the applicant will make available to any person information concerning the applicant's current rates, terms, and conditions for all of its telecommunications services;

Information regarding Applicant's services including terms, conditions, rates and charges are available through the Company's regulatory contact as provided in Response to Question 10 and general terms and conditions are also available on the Company's website at www.fiber.crowncastle.com.

South Dakota Administrative Rules Section 20:10:24:02(14)

Information concerning how the applicant will notify a customer of any materially adverse change to any rate, term, or condition of any telecommunications service being provided to the customer. The notification must be made at least thirty days in advance of the change;

Applicant will provide notice to its affected customers of any materially adverse change to any rate, term or condition of any telecommunications service consistent with the terms of their contracts with Applicant and applicable law, at least thirty (30) days prior to the effective date of the change.

South Dakota Administrative Rules Section 20:10:24:02(15)

A list of the states in which the applicant is registered or certified to provide telecommunications services, whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial, a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified, and a detailed explanation of why the applicant is not in good standing in a given state, if applicable;

Applicant is not currently authorized to provide telecommunications services in any state but is seeking authorization in the District of Columbia and every state, except Alaska. Applicant has not had a certification or authorization denied, suspended, terminated, or revoked by any state. As Applicant is not currently authorized to provide telecommunications services in any state, Applicant possesses no current standing with any regulatory agencies in any state.

South Dakota Administrative Rules Section 20:10:24:02(16)

A description of how the applicant intends to market its services, its target market, whether the applicant engages in any multilevel marketing, and copies of any company brochures used to assist in the sale of services;

Applicant intends to solicit customers for its telecommunications services from its existing customer base and through business-to-business marketing. Applicant will not engage in multilevel marketing. As a newly formed company, Applicant does not currently have any company brochures that will be used to assist in the sale of its proposed services, but, to the extent required, will provide such information to the Commission as it becomes available.

South Dakota Administrative Rules Section 20:10:24:02(17)

Federal tax identification number and South Dakota sales tax number;

Applicant's Federal Taxpayer Identification Number is 334987371. Applicant has not yet applied for a South Dakota sales tax number.

South Dakota Administrative Rules Section 20:10:24:02(18)

The number and nature of complaints filed against the applicant with any state or federal regulatory commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered;

Applicant has not been the subject of complaints for the unauthorized switching of a customer's telecommunications provider, nor for charging customers for services that were not ordered.

South Dakota Administrative Rules Section 20:10:24:02(19)

A written request for waiver of those rules believed to be inapplicable;

As Applicant will not be providing traditional switched local exchange and voice services, Applicant respectfully requests a waiver of S.D. Admin. Rule 20:10:32:10, which requires that South Dakota local exchange carriers make the following services available to their customers (1) access to the public switched telephone network; (2) access to emergency services such as 911 or enhanced 911; (3) access to a local directory and directory assistance; (4) access to operator

services; (5) telecommunications relay service capability or access necessary to comply with state and federal regulations; (6) non-published service upon written request or verbal request of the customer; and (7) access to interexchange services.

South Dakota Administrative Rules Section 20:10:24:02(20)

Other information requested by the commission needed to demonstrate that the applicant has sufficient technical, financial, and managerial capabilities to provide the interexchange services it intends to offer consistent with the requirements of this chapter and other applicable rules and laws.

Granting the Application will promote the public interest by increasing competition in the South Dakota competitive telecommunications market. Applicant will deploy and expand a competitive telecommunications infrastructure in the State, thereby driving prices closer to costs and ensuring just and reasonable rates in addition to promoting efficiency in the delivery of services and in the development of new services. Applicant will provide customers high quality, cost effective telecommunications services, with an emphasis on customer service. Applicant's operations will be overseen by a well-qualified management team with substantial telecommunications experience and technical expertise. These benefits work to maximize the public interest by providing continuing incentives for carriers to reduce costs while simultaneously promoting the availability of desirable services.

For the reasons stated above, Applicant respectfully submits that the public interest, convenience, and necessity would be furthered by a grant of the Application for the authority to provide interexchange services. Accordingly, Applicant requests that the Commission expeditiously grant the Application.