

Morgan Lewis

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February 6, 2024

VIA ELECTRONIC FILING

Adam Teitzman, Director
Florida Public Service Commission
Office of the Commission Clerk
2540 Schumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Surrender of the Certificate of Authority No. 8961
of Electric Lightwave, LLC d/b/a Allstream**

Dear Director Teitzman:

This letter surrenders the Certificate of Authority ("Certificate") No. 8961 of Electric Lightwave, LLC d/b/a Allstream ("Electric Lightwave") in connection with the *pro forma* consolidation of Electric Lightwave into Zayo Group, LLC ("Zayo Group" and together with Electric Lightwave, the "Parties"), with Zayo Group remaining as the surviving entity (the "*Pro Forma Consolidation*"). The *Pro Forma Consolidation* was completed on December 31, 2023, and was undertaken as part of the Company's (as defined below) efforts to simplify its corporate structure, reduce the reporting and accounting burdens (and the burden on the regulatory commissions who receive such reports), and provide operational efficiencies. Zayo Group, as the successor in interest to Electric Lightwave, request that the surrender and cancellation of Electric Lightwave's Certificate be effective January 1, 2024, as soon as the Commission can take action. To the extent that Electric Lightwave has any tariffs on file with the Commission, Zayo Group requests that such tariffs are also cancelled and withdrawn.

Description of the Parties

Zayo Group is, and Electric Lightwave was, a Delaware limited liability company. Prior to the *Pro Forma Consolidation*, Electric Lightwave was a wholly owned, direct subsidiary of Zayo Group. Zayo Group is a wholly owned, direct subsidiary of Zayo Group Holdings, Inc. ("Holdings" and together with its subsidiaries, including the Parties, the "Company"), a Delaware corporation. Zayo Group and Holdings have a principal office located at 1821 30th Street, Unit A, Boulder, Colorado 80301. Electric Lightwave had a principal office located at 18110 SE 34th Street; Building One, Suite 100, Vancouver, Washington 98683.

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Zayo Group is a leading 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 Group's customers consist primarily of wireless service providers, national and regional communications service providers, media/Internet/content companies, governments, banks, and other bandwidth-intensive enterprises. Zayo Group is authorized to provide competitive local exchange, competitive access, and/or interexchange services in the District of Columbia and every state except Alaska and Hawaii. The primary telecommunications service offerings of Zayo Group include high-capacity bandwidth services such as private line, Ethernet, and wavelength services. In Florida, Zayo Group is authorized to provide telecommunications services pursuant to Certificate No. 8836 granted by Order Nos. PSC-13-0099-PAA-TX and PSC-13-0134-CO-TX. Zayo Group also is authorized by the Federal Communications Commission ("FCC") to provide domestic and international telecommunications services in addition to certain point-to-point wireless services.

In Florida, Electric Lightwave is authorized as a local exchange and intrastate interexchange telecommunications services provider pursuant to Certificate No. 8961 granted by Order Nos. PSC-2021-0227-PAA-TX and PSC-2021-0254-CO-TX, which this letter seeks to surrender and cancel.

Contacts

Inquiries or copies of any correspondence, orders, or other materials pertaining to this filing should be directed to:

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1111 Pennsylvania Ave. N.W.
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202-739-3000 (tel)
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with copies to:

Lauren Lantero
General Counsel, Corporate
Zayo Group, LLC
1821 30th Street, Unit A
Boulder, CO 80301
Lauren.lantero@zayo.com

Description of the Pro Forma Consolidation

To simplify the Company's corporate structure, on December 31, 2023, Zayo Group completed certain *pro forma* intra-company transactions, including the consolidation of Electric Lightwave into Zayo Group. The *Pro Forma Consolidation* resulted from the merger of Electric Lightwave with and into Zayo Group, whereupon the separate existence of Electric Lightwave ceased and Zayo Group was the surviving entity. **Exhibit A** contains diagrams of the corporate ownership structure of the Parties before and after the *Pro Forma Consolidation*.

The *Pro Forma Consolidation* described herein was in the public interest. The *Pro Forma Consolidation* simplified the Company's existing corporate structure and the Company's business is more effective from a management, operations, regulatory, accounting,

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financial and customer perspective since the *Pro Forma Consolidation* reduces its reporting and accounting burdens and provides other operational efficiencies. Furthermore, the *Pro Forma Consolidation* was seamless to customers and did not result in any change in their services.

Surrender of the Certificate of Electric Lightwave

Because Electric Lightwave no longer exists or provides telecommunications in Florida, the surrender of Electric Lightwave's Certificate No. 8961 should be effective January 1, 2024, as soon as the Commission can take any necessary action. To the extent that Electric Lightwave has any tariffs on file with Commission, those tariffs are cancelled and withdrawn.

Any questions or inquiries regarding any outstanding regulatory obligations of Electric Lightwave should be directed to:

Donna Heaston
Senior Corporate Counsel
Electric Lightwave/Allstream
2800 Campus Drive, Suite 140
Plymouth, MN 55441
donna.heaston@zayo.com

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Please acknowledge receipt and acceptance of this filing. Should you have any questions regarding this filing, please do not hesitate to contact us.

Respectfully submitted,



Catherine Wang
Brett P. Ferenczak

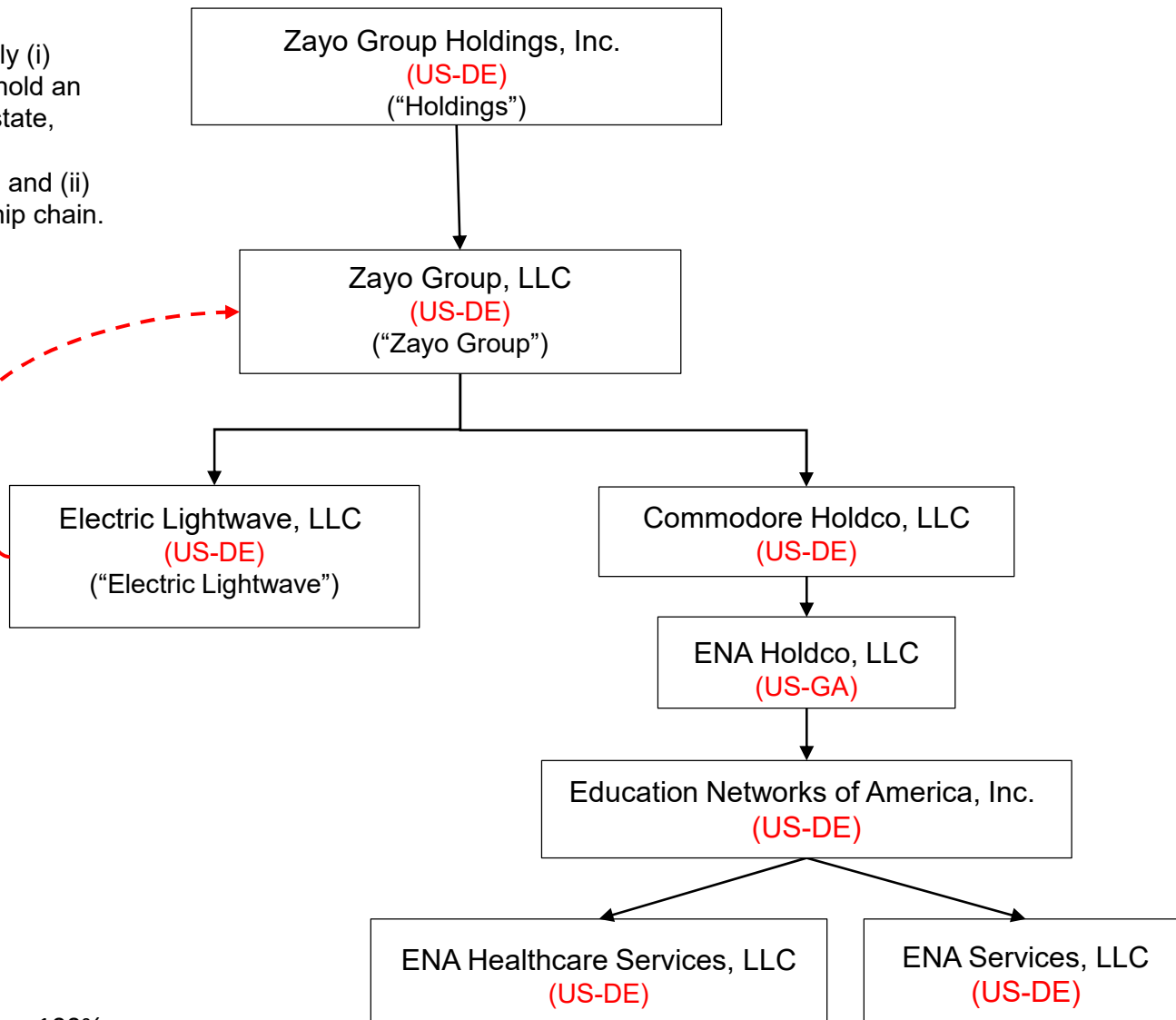
Counsel for the Parties

EXHIBIT A

Pre-*Pro Forma Consolidation* and Current Corporate Ownership Structure Charts

PRE-PRO FORMA CONSOLIDATION OWNERSHIP STRUCTURE

*The entities listed include only (i) subsidiaries of Holdings that hold an authorization to provide intrastate, interstate or international telecommunications services, and (ii) those entities in their ownership chain. The chart excludes all other subsidiaries of Holdings.

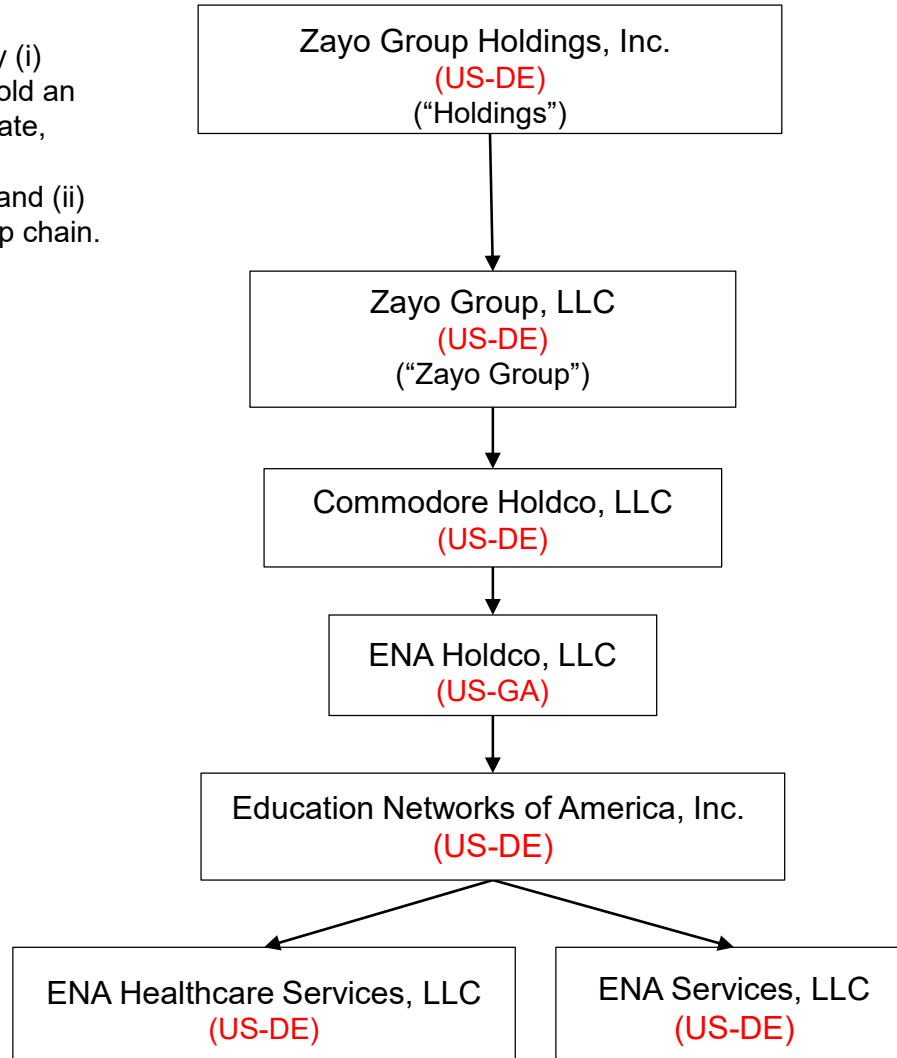


Electric Lightwave merged with and into Zayo Group, with Zayo Group surviving the merger.

**All ownership percentages are 100%.

CURRENT OWNERSHIP STRUCTURE

*The entities listed include only (i) subsidiaries of Holdings that hold an authorization to provide intrastate, interstate or international telecommunications services, and (ii) those entities in their ownership chain. The chart excludes all other subsidiaries of Holdings.




**All ownership percentages are 100%.

VERIFICATION

I, Lauren Lantero, state that I am SVP, General Counsel of Zayo Group, LLC; that Zayo Group, LLC is the successor in interest to Electric Lightwave, LLC (together, 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 regarding the Company and its affiliates, are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of January, 2024.



Lauren Lantero
SVP, General Counsel
Zayo Group, LLC