

Tamar E. Finn
Brett P. Ferenczak
Patricia Cave
tamar.finn@morganlewis.com
brett.ferenczak@morganlewis.com
patricia.cave@morganlewis.com

March 12, 2020

VIA ELECTRONIC FILING

Braulio L. Baez, Executive Director
Florida Public Service Commission
Office of the Commission Clerk
2540 Schumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Notification Regarding a *Pro Forma* Consolidation Affecting Crown Castle NG East LLC and Crown Castle Fiber LLC

Surrender of the Certificate of Crown Castle NG East LLC

Dear Executive Director Baez:

On behalf of Crown Castle Fiber LLC ("Crown Castle Fiber"), as the successor-in-interest to Crown Castle NG East LLC ("CCNG-East", together with Crown Castle Fiber, the "Parties"), this letter notifies the Commission that a *Pro Forma* Consolidation (as defined below) completed on December 31, 2018, resulted in (1) the *pro forma* consolidation of the Florida operations and assets of CCNG-East into Crown Castle Fiber and (2) *pro forma* changes in the ownership chain of Crown Castle Fiber.

In connection with the *Pro Forma* Consolidation, Crown Castle Fiber surrenders CCNG-East's Certificate effective immediately or as soon as the Commission can take such action. To the extent that CCNG-East has any tariffs on file with the Commission, Crown Castle Fiber also requests that such tariffs be cancelled and withdrawn.

Contacts

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

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

with copies to:

Tamar E. Finn
Brett P. Ferenchak
Patricia Cave
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004-2541
Tel: 202-739-3000
Fax: 202-739-3001
tamar.finn@morganlewis.com
brett.ferenchak@morganlewis.com
patricia.cave@morganlewis.com

Fernanda Biehl
Manager, Regulatory Affairs – Fiber
Crown Castle Fiber
2000 Corporate Drive
Canonsburg, PA 15317
Tel: 703-434-8533
Fax: 703-434-8510
PUC.Correspondence@crowncastle.com

Description of the *Pro Forma* Consolidation

The *Pro Forma* Consolidation involved a series of planned intra-company transactions whereby certain of Crown Castle Fiber's operating company affiliates and/or operations and assets of its affiliates (including CCNG-East) were consolidated into Crown Castle Fiber and certain of Crown Castle Fiber's parent companies also were consolidated. The *Pro Forma* Consolidation was undertaken, in part, to streamline the corporate structure and operations of over 20 operating entities of Crown Castle International Corp. ("CCIC") that provide fiber-based services into a single unified and rebranded operating entity:¹ Crown Castle Fiber LLC.

The *Pro Forma* Consolidation also resulted in a change in the intermediate corporate holding company structure between CCIC and Crown Castle Fiber. As a result of the *Pro Forma* Consolidation, Crown Castle Fiber is a direct, wholly owned subsidiary of Crown Castle Fiber Holdings Corp., a Delaware corporation, which was previously a Delaware limited liability company named LTS Group Holdings, LLC² and a direct, wholly owned subsidiary of Crown Castle Operating Company ("CCOC"). CCOC is a Delaware corporation and a direct, wholly owned subsidiary of CCIC. Charts depicting the pre-*Pro Forma* Consolidation and current ownership structure are attached as **Exhibit A**.

As a result of the *Pro Forma* Consolidation, all Florida operations and assets of CCNG-East were consolidated into Crown Castle Fiber. As of January 1, 2019, Crown Castle Fiber provides telecommunications services to CCNG-East's customers pursuant to Crown Castle Fiber's Certificate of Authority No. 8917³ under the same rates, terms and conditions as the services

¹ Certain other operating entities that do not operate in Florida were retained for other reasons.

² As part of the *Pro Forma* Consolidation, LTS Group Holdings, LLC converted from a Delaware limited liability company into a Delaware corporation and was renamed Crown Castle Fiber Holdings Corp. As a result of the *Pro Forma* Consolidation, Crown Castle Fiber Holdings Corp. is a direct, wholly owned subsidiary of CCOC.

³ See Order Nos. PSC-2018-0143-PAA-TX & PSC-2018-0181-CO-TX. This Certificate was originally issued in the name of Lighttower Fiber Networks II, LLC, which subsequently changed its name to Crown Castle Fiber. See Docket No. 20180126-TX.

Braulio L. Baez, Executive Director
March 12, 2020
Page 3

previously provided pursuant to individually negotiated contracts with CCNG-East. The *Pro Forma* Consolidation, therefore, was seamless to customers.

Surrender of the Certificate of CCNG-East

Because CCNG-East no longer provide telecommunications in Florida, Crown Castle Fiber respectfully surrenders the following Certificate effective immediately and requests that the Commission cancel the Certificate at the earliest possible date:

CCNG-East holds CLEC Certificate No. 8516 and AAV Certificate No. 8515.⁴

To the extent that CCNG-East has any tariffs on file with Commission, Crown Castle Fiber also requests that such tariffs be cancelled and withdrawn.

Any questions or inquiries regarding any outstanding regulatory obligations of CCNG-East should be directed to:

Fernanda Biehl
Manager, Regulatory Affairs – Fiber
Crown Castle Fiber
2000 Corporate Drive
Canonsburg, PA 15317
Tel: 703-434-8533
Fax: 703-434-8510
PUC.Correspondence@crowncastle.com

* * * *

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,

/s/Brett P. Ferenchak

Tamar E. Finn
Brett P. Ferenchak
Patricia Cave

Counsel for Crown Castle Fiber LLC

⁴ See Order No. PSC-12-0622-FOF-TP, Docket No. 120273-TP. CCNG-East converted to a limited liability company. See Docket No. 140056-TP.

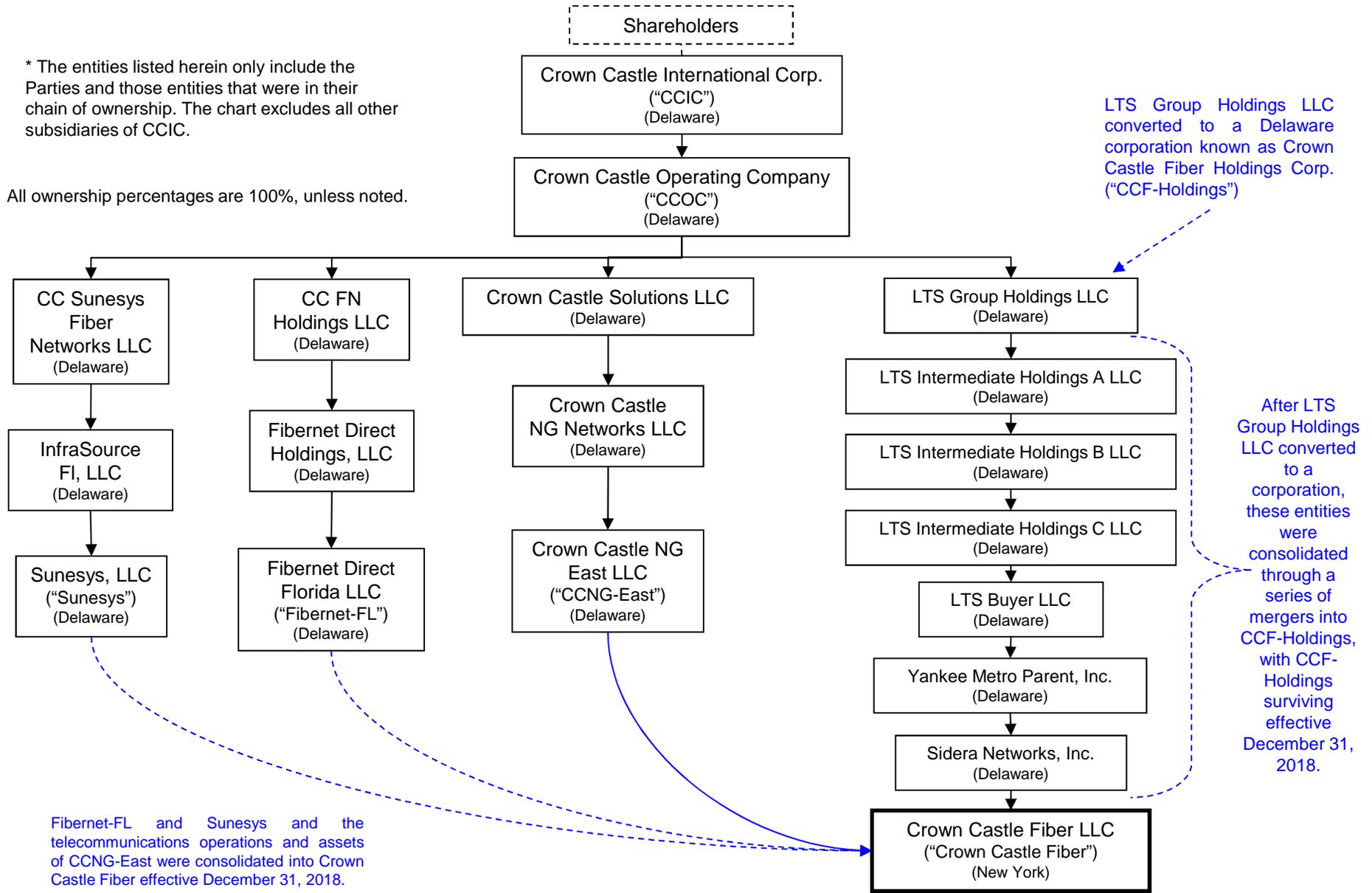
EXHIBIT A

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

Pre-Pro Forma Consolidation Corporate Ownership Structure of the Parties*

* The entities listed herein only include the Parties and those entities that were in their chain of ownership. The chart excludes all other subsidiaries of CCIC.

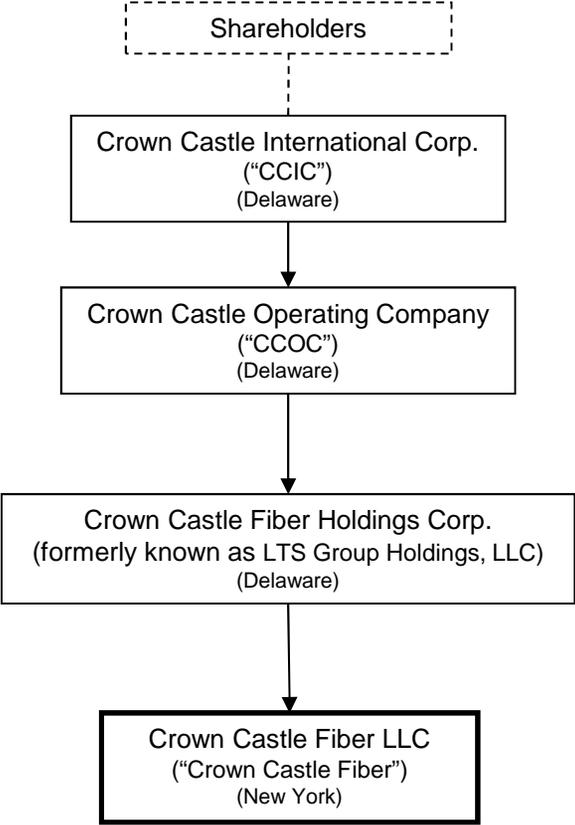
All ownership percentages are 100%, unless noted.



Fibernet-FL and Sunesys and the telecommunications operations and assets of CCNG-East were consolidated into Crown Castle Fiber effective December 31, 2018.

Current Corporate Ownership Structure of Crown Castle Fiber

* The entities listed herein only include Crown Castle Fiber and those entities that are in its chain of ownership. The chart excludes all other subsidiaries of CCIC.



All ownership percentages are 100%.