

September 12, 2019

**VIA ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, DC 20554

**Re: WC Docket No. 19-245; SUPPLEMENT**

Dear Ms. Dortch:

At the request of Commission staff, Cable Bahamas Ltd. (“Transferor”) and Summit Ultimate Holdings LLC (“Transferee”) submit this letter to supplement their domestic Section 214 transfer of control application in the above-referenced proceeding.

First, Transferee clarifies the geographic areas where its domestic telecom affiliates provide service and the types of services provided. Transferee does not provide telecommunications services but is affiliated with Great Plains Communications LLC, an ILEC that serves communities in Nebraska, Colorado, Kansas, and South Dakota; Great Plains Broadband, LLC, a CLEC that serves communities in Nebraska; and InterCarrier Networks, LLC, a CLEC that serves communities in Illinois and Indiana. As explained in the application, Grain Management, LLC (“Grain Management”) manages and is affiliated with Grain Communications Opportunity Fund II, L.P. (“GCO Fund II”). While Grain Management does not hold a 10% or greater equity or voting interest in GCO Fund II, the fund’s general partner, Grain GP IV, LLC, is ultimately controlled by David J. Grain, the founder and owner of Grain Management. Transferee clarifies that Grain Management also manages and is affiliated with Grain Communications Opportunity Fund, L.P., which owns a controlling interest in WANRack, LLC (“WANRack”). Grain Communications Opportunity Fund, L.P. has no ownership interest in the Transferee. WANRack is a competitive provider that builds private fiber networks for K-12 school districts around the country, and since WANRack only offers services on a competitive basis, there is no risk of ILEC overlap as a result of the present transaction.

Second, Transferor confirms that Orlando Telephone provides services on a CLEC basis to commercial and residential customers located in Central and Southwest Florida. Orlando Telephone does not operate as an ILEC in any location.

Lastly, Transferor and Transferee clarify that the pending application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(iii) of the Commission’s Rules for the following reasons: (1) upon completion of the proposed transaction, Transferee will have a market share in the interstate, interexchange market of less than 10%; (2) Transferee’s affiliates that provide local exchange services are not a party to the pending transaction; (3) all of the ILECs described herein (including those of affiliates of Transferee) are “independent” incumbent local exchange carriers as defined in Section 64.1902 of the Commission’s Rules; and (4) the independent ILECs, in combination, have fewer than 2% of the nation’s subscriber lines installed in the aggregate nationwide and no overlapping or adjacent service areas.

Please direct any questions to the undersigned.

Respectfully submitted,

**SUMMIT ULTIMATE HOLDINGS LLC**

**CABLE BAHAMAS LTD.**

/s/

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