

Morgan Lewis

Catherine Wang

Brett P. Ferenchak

catherine.wang@morganlewis.com

brett.ferenchak@morganlewis.com

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VIA E-FILING

Oregon Public Utility Commission

201 High St SE, Suite 100

Salem, Oregon 97301

Attn: Filing Center

**Re: Docket Nos. CP 348, CP 351, CP 442, CP 483, CP 526, CP 938, CP 956,
CP 1175, CP 1579 & CP 1503**

Notification Regarding the Transfer of Indirect Control of Integra Telecom of Oregon, Inc., Shared Communications Services, Inc., Electric Lightwave, LLC, United Communications, Inc. dba UNICOM, Advanced TelCom, Inc. dba Integra Telecom, Eschelon Telecom of Oregon, Inc. dba Integra Telecom, Oregon Telecom, Inc., World Communications, Inc., and opticAccess, LLC to Zayo Group, LLC

Dear Sir or Madam:

By this letter, Electric Lightwave Parent, Inc. ("EL Parent"); Integra Telecom of Oregon, Inc. ("Integra"); Shared Communications Services, Inc. ("SCS"); Electric Lightwave, LLC ("Electric Lightwave"); United Communications, Inc. dba UNICOM ("UNICOM"); Advanced TelCom, Inc. dba Integra Telecom ("Advanced"); Eschelon Telecom of Oregon, Inc. dba Integra Telecom ("Eschelon"); Oregon Telecom, Inc. ("Oregon Telecom"); World Communications, Inc. ("World Communications"); opticAccess, LLC ("opticAccess") (Integra, Electric Lightwave, Eschelon, Advanced, SCS, Oregon Telecom, UNICOM, World Communications, and opticAccess collectively, the "Licensees"); and Zayo Group, LLC ("Zayo") (collectively, the "Parties") notify the Commission that effective March 1, 2017, Zayo acquired indirect control of Licensees (the "Transaction"). Commission approval or prior notice was not required for the Transaction. Accordingly, this letter is submitted for informational purposes.

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

T +1.202.739.3000
F +1.202.739.3001

Description of the Parties

A. Zayo Group, LLC

Zayo is a Delaware limited liability company with principal offices at 1805 29th Street, Boulder, Colorado 80301. Zayo is a wholly owned subsidiary of Zayo Group Holdings, Inc. ("Holdings"), a publicly traded Delaware corporation (NYSE: ZAYO). Holdings has no majority owner.

Zayo is a provider of bandwidth infrastructure and network neutral colocation and interconnection services over regional and metropolitan fiber networks. These services enable customers to manage, operate, and scale their telecommunications and data networks. Such customers consist primarily of wireless service providers, national and regional telecommunications carriers and other communications service providers, media and content companies, schools, hospitals, governments, banks and other bandwidth-intensive enterprises.

In Oregon, Zayo is authorized to provide local exchange service and interexchange services pursuant to Order No. 11-147 issued in Docket No. CP 1503 on May 5, 2011. Zayo is also authorized by the FCC to provide interstate and international telecommunications services.

B. EL Parent and Licensees

Electric Lightwave Parent, Inc. is a Delaware corporation. Through its wholly owned subsidiaries, EL Parent owns and operates a number of telecommunications providers that operate primarily in Arizona, California, Colorado, Idaho, Minnesota, Montana, Nevada, North Dakota, Oregon, Utah, and Washington. These subsidiaries provide a broad range of communication and networking services primarily to business customers, wholesale carriers, web content providers, government organizations, and educational institutions.

In Oregon, Licensees hold the following authorizations:

1. Integra Telecom of Oregon, Inc., an Oregon corporation, is authorized to provide local exchange and intrastate interexchange services pursuant to Order No. 97-385 issued in Docket No. CP 348 on October 1, 1997.
2. Shared Communications Services, Inc., an Oregon corporation, is authorized to provide local exchange and interexchange services, shared tenant services, and operator services pursuant to Order No. 97-423 issued in Docket No. CP 351 on November 3, 1997.
3. Electric Lightwave, LLC, a Delaware limited liability company, is authorized to provide local exchange and interexchange services pursuant to Order No. 98-247 issued in Docket No. CP 442 on June 22, 1998.
4. United Communications, Inc. dba UNICOM, an Oregon corporation, is authorized to provide local exchange and interexchange services pursuant to Order No. 98-411 issued in Docket No. CP 483 on October 2, 1998.

5. Advanced TelCom, Inc. dba Integra Telecom, a Delaware corporation, is authorized to provide local exchange and interexchange services pursuant to Order No. 98-521 issued in Docket No. CP 526 on December 14, 1998.
6. Eschelon Telecom of Oregon, Inc. dba Integra Telecom, a Minnesota corporation, is authorized to provide local exchange and interexchange services pursuant to Order No. 01-606 issued in Docket No. CP 938 on July 25, 2001.
7. Oregon Telecom, Inc., an Oregon corporation, is authorized to provide local exchange and interexchange services pursuant to Order No. 01-738 issued in Docket No. CP 956 on August 17, 2001.
8. World Communications, Inc., a Washington corporation, is authorized to provide resold and facilities-based local service, resold interexchange service with the classification as a competitive provider pursuant to Order No. 09-289 issued in Docket No. CP 1175 on July 27, 2009.
9. opticAccess, LLC, a Nevada limited liability company, is a competitive provider of intraexchange service in select local exchanges, and interexchange service statewide, pursuant to Order No. 15-214 issued in Docket No. CP 1579 on July 9, 2015.

Contacts

For the purposes of this filing, contacts are as follows:

Catherine Wang
Brett P. Ferenchak
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave., N.W.
Washington, DC 20004-2541
202-739-3000 (tel)
202-739-3001 (fax)
catherine.wang@morganlewis.com
brett.ferenchak@morganlewis.com

With a copy to:

and:

Gregg Strumberger, General Counsel
Zayo
1805 29th St., Suite 2050
Boulder, CO 80301
wendy.cassidy@zayo.com
gregg.strumberger@zayo.com

Douglas Denney
Vice President, Costs & Policy
Electric Lightwave
18110 SE 34th St
Building One, Suite 100
Vancouver, WA 98683
dkdenney@electriclightwave.com

Description of the Transaction

Pursuant to the Agreement and Plan of Merger, dated as of November 29, 2016, by and among Zayo, ZELMS, Inc. (a direct, wholly owned subsidiary of Zayo created for purposes of

the merger) ("Merger Sub"), EL Parent, and Fortis Advisors LLC, as the Equityholder Representative (the "Agreement"), Zayo acquired all of the outstanding equity interests in EL Parent. Specifically, Merger Sub merged with and into EL Parent, whereupon the separate existence of Merger Sub ceased and EL Parent became the surviving corporation. As a result, EL Parent became a direct, wholly owned subsidiary of Zayo. Licensees remained indirect subsidiaries of EL Parent and Licensees became indirect subsidiaries of Zayo. Diagrams depicting the pre-Transaction and current corporate ownership structures are appended hereto as Exhibit A.

The Transaction described herein serves the public interest. As part of Zayo, Licensees continue to provide high-quality telecommunications services to consumers (under the same rates, terms and condition of services as currently provided) while gaining access to the additional resources and operational expertise of Zayo. Licensees will benefit by being able to offer services to multi-location business and enterprise customers across a larger footprint in combination with Zayo. The network of EL Parent and its subsidiaries, including Licensees, complements Zayo's network, and the acquisition increased Zayo's existing fiber footprint. The Transaction also provided Licensees with access to greater financial resources that will allow them to more effectively compete with larger incumbent telecommunications providers. In essence, the Transaction made Licensees and Zayo stronger competitors and thereby benefit consumers.

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This letter has been electronically filed with the Commission. We would appreciate acknowledgement of receipt and acceptance of this letter. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

/s/ Brett P. Ferenchak

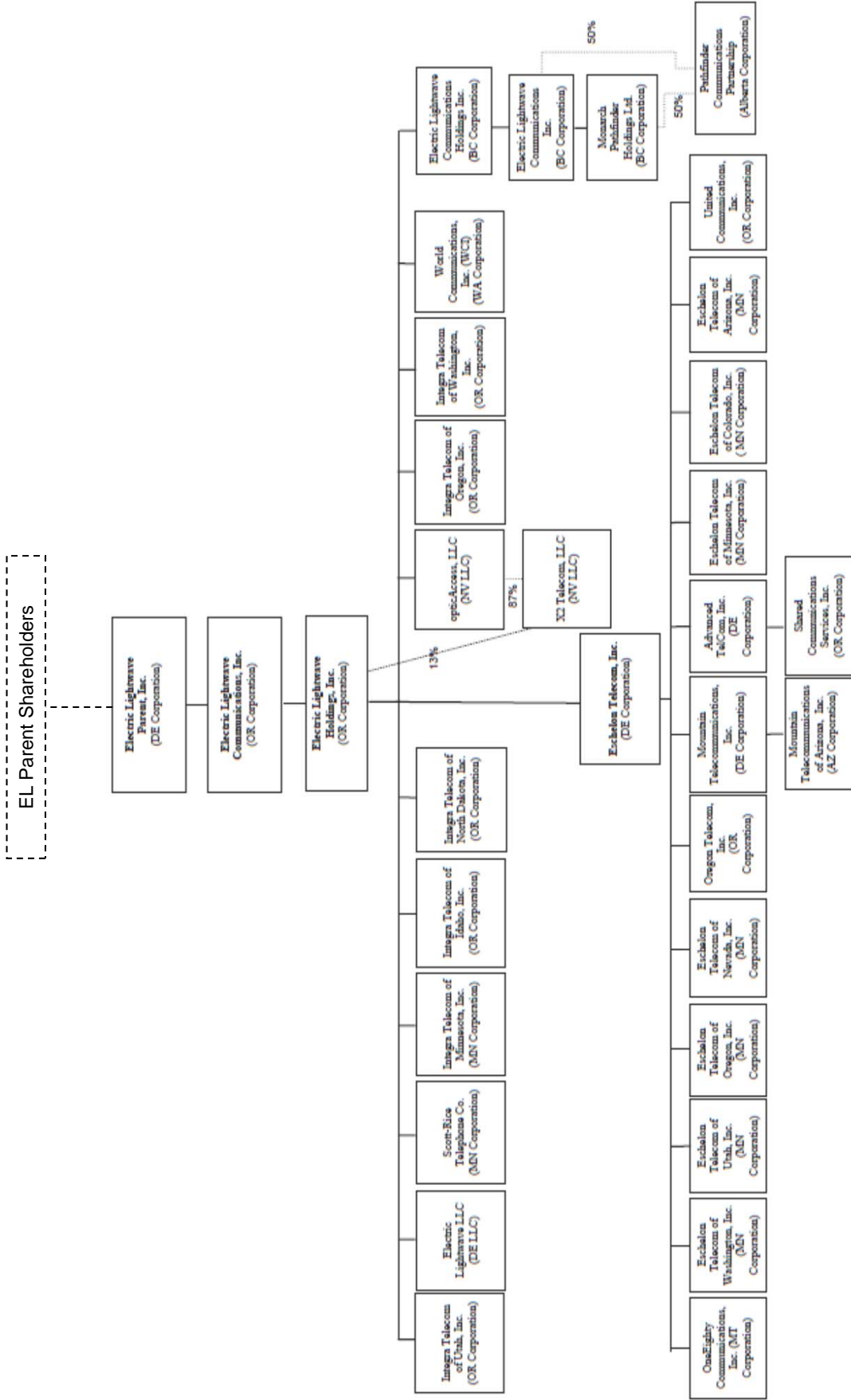
Catherine Wang
Brett P. Ferenchak

Counsel for the Parties

EXHIBIT A

Diagrams of the Pre-Transaction and Current Corporate Ownership Structures

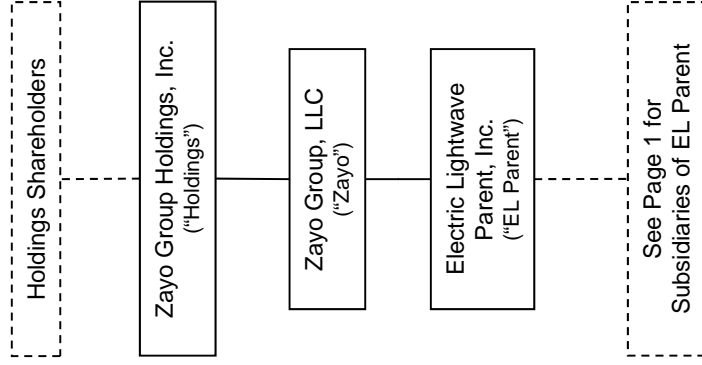
Pre-Transaction Corporate Ownership Structure of EL Parent



Unless otherwise indicated all ownership percentages are 100%.

Current Corporate Ownership Structure of EL Parent and Zayo

* The entities listed herein only include Zayo and its subsidiaries that (1) hold authorization to provide intrastate, interstate or international telecommunications services or (2) are in the chain of ownership of those entities. The chart excludes subsidiaries and affiliates of Zayo that do not hold authorization to provide telecommunications services in the United States.



Unless otherwise indicated all ownership percentages are 100%.