

Stevens & Lee

17 N. Second Street, 16th Floor
Harrisburg, PA 17101
(717) 234-1090
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: michael.gruin@stevenslee.com
Direct Fax: (610) 988-0852

August 29, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission:
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17210

Re: Joint Application of Cablevision Lightpath LLC and United Federal Data of Pennsylvania, LLC for Approval of a General Rule Transaction Resulting in a Transfer of Control
Docket No. A-2025-3056418

Dear Secretary Homsher:

Enclosed for filing please find the responses of Cablevision Lightpath LLC and United Federal Data of Pennsylvania, LLC to the Set I TUS Data Requests in the above-referenced matter.

If you have any questions, please do not hesitate to contact me. Thank you.

Respectfully submitted,

/s/ Michael A. Gruin

Michael A. Gruin

*Counsel for Cablevision Lightpath LLC
and United Federal Data of
Pennsylvania, LLC*

Enc.

cc: Bambi Reese, TUS (via email)
Phil Marchesiello (via email)
Karen Milne (via email)

**Responses of Cablevision Lightpath LLC and United Federal Data of
Pennsylvania, LLC to Data Request TUS 1
Docket No.: A-2025-3056418**

1. *Identify the ultimate parent of each party to the transaction and the valuation of each.*

RESPONSE: Cablevision Lightpath LLC (“Lightpath”) is the parent of United Federal Data of Pennsylvania, LLC (“UFD-PA”). Lightpath is wholly owned and controlled by its parent company Lightpath Holdings LLC. Lightpath’s implied valuation is in excess of \$3.2 billion, based upon Morgan Stanley Infrastructure Partners’ purchase of a 49.71 percent ownership interest in Lightpath in December 2020. A copy of Lightpath’s most recent annual report is available [here](#).

2. *Identify the Pennsylvania jurisdictional revenue of each party to the transaction and its Pennsylvania proportion of total revenue.*

RESPONSE: As set forth in the Telecommunications Annual Financial Report filed by UFD-PA with the Commission for the calendar year ending December 31, 2024, UFD-PA’s revenues in Pennsylvania were \$124,308, which was 17.2% of total revenues (also as set forth that report). UFD-PA’s parent company, Lightpath, is not a certificated carrier in Pennsylvania.

3. *Affirm that the transaction has not already taken place (i.e., is not Nunc Pro Tunc in nature) and that the transaction will not be consummated prior to receiving Commission approval. If not included in the filing, provide the known or anticipated transaction closing date.*

RESPONSE: The Transaction (as defined in the Joint Application) has not already taken place, and is subject to the regulatory approvals set forth in the response to Data Request No. 4. The parties anticipate closing the Transaction in 2025 following receipt of the last of all required regulatory approvals.

4. *Identify all jurisdictions where this or a related transaction has been filed and where approval is being sought. Provide the status of each filing. While pending in Pennsylvania, identify any jurisdiction that acts on the transaction and describe the action taken. Provide updates as necessary.*

RESPONSE: The parties to the Transaction have filed applications for approval in Maryland, New York, New Jersey, and Virginia, and all such applications remain pending as of the date hereof.¹ In addition, as explained in the response to Data Request

¹ The applications seek approval for the Transaction and the Financing Arrangements (as defined in the Joint Application). On August 12, 2025, this Commission approved the Financing Arrangements through its grant of a Joint Abbreviated Securities Certificate. See Letter to Michael A. Guin re Joint Abbreviated Securities Certificate of Cablevision Lightpath LLC, Lightpath Guarantor LLC, Lightpath

No. 15, shortly before closing, the parties will file an application with the FCC. The parties will provide updates to the Commission as approvals for the Transaction are obtained.

5. *If any conditions are under consideration, imposed, or agreed to in any jurisdiction in which this or a related transaction is pending, please update the filing to include that information as it occurs.*

RESPONSE: The parties will promptly notify the Commission if any conditions are under consideration, imposed, or agreed to in connection with the Transaction in any other jurisdiction.

6. *Identify all Pennsylvania-specific impacts known, anticipated, or considered that will or may result in any fashion from the transaction.*

RESPONSE: Other than the public interests benefits set forth in the Joint Application, no Pennsylvania-additional specific impacts are known, anticipated, or considered.

7. *If synergies as to scope or scale, or merger savings, are posed as a substantial public benefit overall, identify each anticipated synergy and/or savings. Identify the financial or other value of those synergies and/or savings and explain how such value was calculated.*

RESPONSE: No synergies are anticipated because the Transaction simply involves the insertion of two newly formed, pass-through holding companies, Lightpath Guarantor LLC and Lightpath Issuer LLC, into the chain of ownership of the Applicants. As a result, ultimate ownership and control of Lightpath and its licensee subsidiary UFD-PA will be the same both before and after consummation of the Transaction, as will its day-to-day management. As explained in the Application, the Transaction is being effectuated merely to facilitate Applicants' participation in the Financing Arrangement, which was approved by this Commission on August 12.²

8. *Identify whether any of the anticipated benefits of the transaction are expected to arise from the loss or potential loss of Pennsylvania jobs, tax revenues, facilities, or downsizing, or consolidation that affects Pennsylvania, or any other impact in Pennsylvania.*

RESPONSE: The Transaction, which is being undertaken in connection with the Financing Arrangement, simply involves the insertion of two newly formed, pass-through holding companies, Lightpath Guarantor LLC and Lightpath Issuer LLC, into the chain of ownership of the Applicants. As a result, no loss or potential loss of Pennsylvania jobs, tax revenues, facilities, or downsizing, or consolidation that affects Pennsylvania, or any other impact in Pennsylvania, will occur in connection with the Transaction.

Issuer LLC, and United Federal Data of Pennsylvania, LLC, Docket Nos. S-2025-3056507; S-2025-3056509; S-2025-3056510; S-2025-3056511 (dated August 12, 2025).

² See *supra* at note 1.

9. *Identify the location and number of any employees, offices, or facilities of each party to the transaction that are located in Pennsylvania.*

RESPONSE: Lightpath and its licensee subsidiary UFD-PA have one employee, no offices, and limited fiber infrastructure and related facilities in Pennsylvania.

10. *Identify any functions, operations, or activities of any nature currently performed in or affecting Pennsylvania that may be impacted as a result of the transaction. Specifically, identify any operations that will be eliminated and any impact on Pennsylvania employment.*

RESPONSE: The Transaction simply involves the insertion of two newly formed, pass-through holding companies, Lightpath Guarantor LLC and Lightpath Issuer LLC, into the chain of ownership of the Applicants. As a result, the Transaction will not affect the day-to-day operations or management.

11. *Identify the number of Pennsylvania customers served by each of party to the transaction.*

RESPONSE: Lightpath and its licensee subsidiary UFD-PA currently serve 13 customers in Pennsylvania.

12. *Identify all service markets (e.g., local exchange market, special access market) in Pennsylvania in which each party to the transaction or any affiliates participate.*

RESPONSE: Lightpath and its licensee subsidiary UFD-PA offer dark fiber and high-capacity data transport services to other carriers and large enterprise businesses in Pennsylvania, including Ethernet and internet access services.

13. *Identify all geographic areas in Pennsylvania in which the Applicant(s), affiliates, or any other entities affected by the transaction offer services.*

RESPONSE: Adams, York, Lancaster, Berks, Montgomery, and Bucks counties.

14. *Identify any and all unaffiliated providers offering the same or competitive services as those of the Applicant(s) in the same geographic locales within Pennsylvania. Reference to all certificated carriers on file at the Commission will not be considered an acceptable or complete response.*

RESPONSE: Shentel, DQE, Zayo, Comcast Business, Verizon, Firstlight, Crown Castle, Blue Ridge CATV, Lumen Technologies, FastBridge Fiber, Frontier Communications, LUMOS Networks, Velocity Fiber, Windstream, and Zito Media.

15. If the transaction is pending before the Federal Communications Commission (FCC), the U.S. Department of Justice (DOJ), or any other federal agency, please provide unexpurgated copies of responses provided to the FCC, DOJ, or other staff inquiries and data requests.

RESPONSE: The Transaction is not pending before the FCC, DOJ or any other federal application. Shortly prior to closing, the parties will file an application with the FCC seeking prior approval for the Transaction with respect to certain private microwave wireless licenses held by Lightpath. The parties anticipate that this application will be processed via the FCC’s “immediate approval procedures”. In addition, the parties will file a post-closing notice with the FCC to update the FCC’s records for an international Section 214 authorization held by Lightpath. UFD-PA does not hold any FCC authorizations.

16. While the transaction remains pending before the Commission, provide updates to the status of the transaction or of any changes to the application at the federal level as soon as they occur.

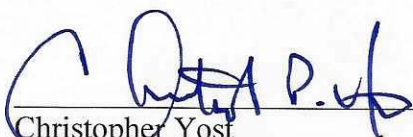
RESPONSE: The parties will provide the Commission with updates as developments occur.

17. If the proposed transaction involves a foreign interest, describe in detail why state regulatory action on the proposed transaction would not be adverse to national security while DOJ approval remains pending.

RESPONSE: The Transaction does not involve foreign interest. Indeed, the Transaction will not result in any new ownership of the parties, as it simply involves the insertion of two newly formed, pass-through holding companies into the chain of ownership of the parties. In addition, as explained in the response to Data Request No. 15, there is no pending DOJ approval for the Transaction.

VERIFICATION

I, Christopher Yost, state that I am the General Counsel and Secretary of Cablevision Lightpath LLC ("Lightpath"). I am authorized to make this verification on behalf of Lightpath and United Federal Data of Pennsylvania, LLC. I hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Christopher Yost
General Counsel and Secretary
Cablevision Lightpath LLC

Executed this 29th day of August, 2025.