

September 18, 2025

BY ELECTRONIC FILING

Matthew Homsher
Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Application of Campus Communications Group, Inc. for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public in the Commonwealth of Pennsylvania, Docket Nos. A-2023-3043664, A-2023-3043667, and A-2023-3043668

Dear Secretary Homsher:

Campus Communications Group, Inc. (“CCG”), Utility Code 3126630, hereby amends its application for approval to provide telecommunications services in the Commonwealth of Pennsylvania. CCG seeks to update its application to reflect a *pro forma* change to CCG’s ownership due to an internal corporate restructuring.

Please contact the undersigned if you have any questions concerning this matter.

Respectfully submitted,

/s/ Katy J. Milner

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DESCRIPTION OF INTERNAL CORPORATE RESTRUCTURING

Campus Communications Group, Inc. (“CCG”) (Utility Code 3126630), seeks to amend its original filings for approval to provide telecommunications services at Docket Nos. A-2023-3043664, A-2023-3043667, and A-2023-3043668 to reflect an internal corporate restructuring (the “Corporate Restructuring”). CCG provides herein updated ownership information and pre- and post-close organizational charts, replacing the information previously submitted.

Currently, CCG is 100% directly owned by Pavlov Media, Inc. (“Pavlov Media”) which is in turn directly owned by 1) MIP VI Trainer, L.P., the majority shareholder having an over 50% interest, 2) Mark Scifres and certain Scifres family trusts, having a below 50% interest, and 3) other Pavlov Shareholders having a less than 5% interest (collectively, the “Pavlov Media Shareholders”).

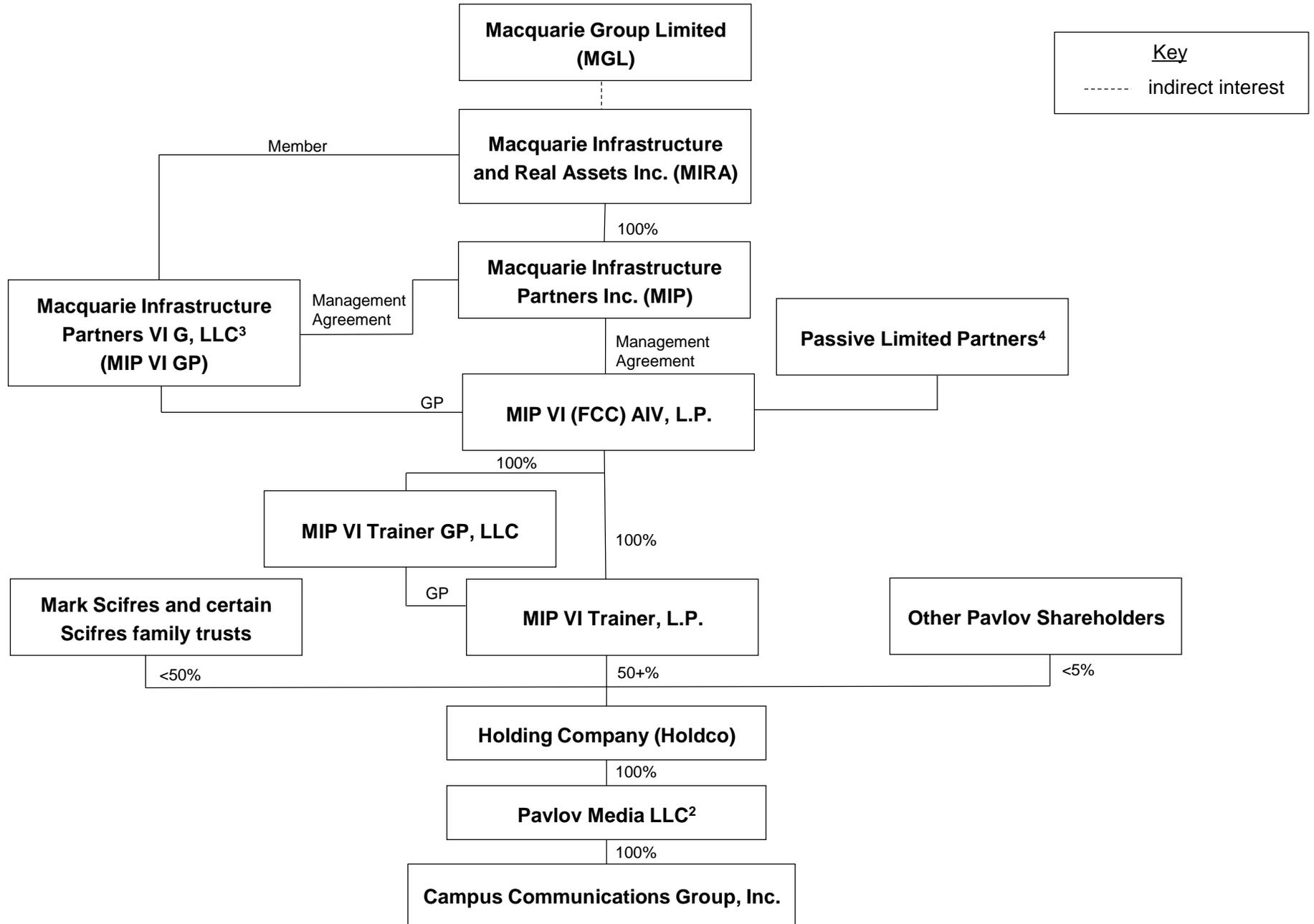
CCG is undertaking the Corporate Restructuring in connection with a Credit Agreement entered into on May 19, 2025. In order to obtain this financing, CCG must implement these changes to its organizational structure, which will better enable the lenders to exercise remedies if needed. The Corporate Restructuring will involve the insertion of a new holding company, Pavlov Holdco Inc. (“HoldCo”) with a 100% direct ownership interest in Pavlov Media and a new wholly owned subsidiary of Holdco called Pavlov Merger Sub Inc. (“Merger Sub”). Merger Sub will merge with and into Pavlov Media. Pavlov Media will also convert into a Delaware limited liability company. The end result of the Corporate Restructuring will be Pavlov Media, LLC surviving as a wholly owned subsidiary of Holdco. Pre- and post-close organizational charts are attached as Exhibit A.

The Corporate Restructuring will not cause a change in the ultimate indirect ownership control of CCG, nor will it involve any assignment of licenses, assets, or customers. Immediately following the corporate changes, CCG will continue to provide service to existing customers using the same name, rates, terms, and conditions and without any interruption of service. The Corporate Restructuring will not affect existing tariffs, existing affiliate interest agreements, or CCG’s ability to comply with applicable laws and regulations.

This Corporate Restructuring will affirmatively promote the service and convenience of the public in a substantial way. The financing will expand CCG’s available capital and enable it to grow through new investments. These additional financial resources will allow CCG to strengthen its competitive positions to the benefit of its customers, particularly residents of multi-unit residential housing and students residing in multi-unit off-campus housing. Promoting competition among providers for these services will benefit the public interest.

Exhibit A
Pre- and Post-Close Organizational Charts

Post-Close Organizational Chart¹



1. All ownership interest percentages refer to the equity value of Pavlov Media, Inc. held by the applicable party after closing.

2. Pavlov Media LLC subsidiaries not holding authorizations are omitted from this chart.

3. MIRA Inc. is the managing member of MIP VI GP appointed by another indirect subsidiary of MGL, which holds a passive economic interest in MIP VI GP. MIP VI GP is responsible for the management of MIP VI (FCC) AIV, L.P., but various rights and obligations of MIP VI GP as the general partner are delegated to, and performed by, MIP Inc. as the manager, pursuant to the Management Agreement entered into, and among, MIP VI GP, MIP Inc., MIP VI LP, MIP VI (FCC) AIV, L.P., and other alternative investment vehicles of MIP VI LP.

4. Third-party limited partners hold passive interests directly or indirectly through aggregator entities and have only customary investor protection rights.