

Morgan Lewis

Catherine G. Vasudevan

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February 3, 2026

Via E-Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Joint Application of WANRack Holdings LLC, CBRE Infra Fiber LLC,
WANRack, LLC, and GW Operating, LLC**

Dear Secretary Homsher:

On behalf of WANRack Holdings LLC, CBRE Infra Fiber LLC, WANRack, LLC, and GW Operating, LLC (together, the "Applicants"), enclosed for electronic filing with the Commission is a Joint Application for Approval of a General Rule Transaction Involving an Assignment of Certain Assets from WANRack, LLC to GW Operating, LLC and a Change in Direct and Indirect Ownership of WANRack, LLC.

The filing fee in the amount of \$350.00 will be remitted online by credit card with the submission of the Joint Application.

We would appreciate acknowledgement of receipt and acceptance of this filing. Should you have any questions concerning this submission, please contact my colleagues Danielle Burt danielle.burt@morganlewis.com and Patricia Cave at patricia.cave@morganlewis.com.

Respectfully submitted,

/s/ Catherine G. Vasudevan

Catherine G. Vasudevan
PA I.D. No. 210254

Counsel for Applicants

cc: Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of

WANRACK HOLDINGS LLC,

CBRE INFRA FIBER LLC,

WANRACK, LLC,

AND

GW OPERATING, LLC

Docket No. _____

for Approval of a General Rule Transaction
Involving an Assignment of Certain Assets
from WANRack, LLC to GW Operating,
LLC and a Change in Direct and Indirect
Ownership of WANRack, LLC

**JOINT APPLICATION FOR APPROVAL
OF A GENERAL RULE TRANSACTION**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

THIS APPLICATION (“Application”) is filed as a General Rule Transaction, pursuant to 52 Pa. Code § 63.324, by WANRack Holdings LLC (“WANRack Holdings”), CBRE Infra Fiber LLC (“CBRE Infra”), WANRack, LLC (“WANRack”), and GW Operating, LLC (“GW Operating”) (collectively, the “Applicants”). To the extent necessary and pursuant to Section 1102(a) of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1102(a), the Pennsylvania Public Utility Commission’s (“Commission”) Policy Statement on Utility Stock Transfers at 52 Pa. Code § 69.901, and the Commission’s regulations on Abbreviated Procedures for Review and Approval of Transfer of Control for Telecommunications Public Utilities at 52 Pa. Code §§ 63.321-63.325,

the Applicants seek Commission approval of (1) an assignment of certain assets from WANRack to its affiliate, GW Operating (the “Assignment”); and (2) a change in direct and indirect ownership of WANRack, with no change to ultimate owners, by removing direct and intermediate holding companies, resulting in CBRE Infra becoming the direct parent of WANRack (the “Restructuring,” and collectively with the Assignment, the “Transaction”).

In support of this Application, the Applicants provide the following information:

II. **DESCRIPTION OF THE APPLICANTS**

A. WANRack Holdings, LLC (“WANRack Holdings”)

WANRack Holdings is a Delaware limited liability company located at 4550 West 109th Street, Suite 115, Overland Park, Kansas 66211. WANRack Holdings does not provide telecommunications services but is rather a holding company. WANRack Holdings’ direct parent is CBRE Caledon WR Holdings, LP (“CBRE Caledon”), a Delaware limited partnership with a principal office located in the care of CBRE Investment Management Infrastructure Inc., 120 Bremner Blvd., Suite 1100, Toronto, Ontario M5J 0A8.¹

B. CBRE Infra Fiber LLC (“CBRE Infra”)

CBRE Infra is a Delaware limited liability company with a principal office located in the care of CBRE Investment Management Infrastructure Inc., 120 Bremner Blvd., Suite 1100, Toronto, Ontario M5J 0A8. CBRE Infra does not, and will not, provide telecommunications services. On March 24, 2025, in Docket No. A-2024-3052673, the Commission approved a change in indirect ownership of WANRack, with no change to ultimate owners, that inserted holding companies CBRE Infra Fiber Holdings LLC (“CBRE Infra Holdings”) and CBRE Infra above

¹ The Commission issued a Secretarial Letter approving the transfer of indirect control of WANRack to CBRE Caledon in Docket No. A-2021-3024808 on May 18, 2021.

CBRE Caledon in WANRack's indirect ownership structure. As noted, WANRack will become a wholly owned, direct subsidiary of CBRE Infra.

CBRE Infra and CBRE Caledon are affiliates of CBRE Investment Management Infrastructure Inc. ("CBRE IM"),² a leading infrastructure solutions provider that seeks to create long-term value by accessing and managing high-quality investment opportunities and building comprehensive and customized infrastructure portfolios. CBRE IM is ultimately controlled by CBRE Group, Inc. (NYSE: CBRE).

C. WANRack, LLC ("WANRack")

WANRack is a Delaware limited liability company with a principal office located at 4550 West 109th Street, Suite 115, Overland Park, Kansas 66211. WANRack is currently directly wholly owned by WANRack Holdings.

Founded in 2013, WANRack owns and operates private fiber wide area networks built for school districts across 23 states and provides services to certain other customers. In Pennsylvania, WANRack is authorized by the Commission to provide telecommunications services as: (1) a detariffed interexchange reseller pursuant to authority granted in Docket No. A-2019-3008733 on May 23, 2019; (2) a competitive local exchange carrier ("CLEC") within the service territories of Verizon Pennsylvania LLC and Verizon North LLC pursuant to authority granted in Docket No. A-2019-3008734 on May 23, 2019; and (3) a competitive access provider ("CAP") throughout the Commonwealth of Pennsylvania pursuant to authority granted in Docket No. A-2019-3008735 on May 23, 2019. WANRack also is authorized to provide intrastate telecommunications services in the following states in addition to Pennsylvania: Alabama, Arizona, Arkansas, Colorado,

² CBRE IM changed its name from CBRE Caledon Capital Management Inc.

Connecticut, Florida, Georgia, Idaho, Illinois, Indiana, Kansas, Kentucky, Missouri, Montana, Nevada, Ohio, Oklahoma, Texas, Virginia, Washington, Wisconsin, and Wyoming.

D. GW Operating, LLC (“GW Operating”)

GW Operating is a Delaware limited liability company formed on October 7, 2025, with a principal office located at 2342 Technology Dr., Suite 103, O’Fallon, Missouri 63368. GW Operating is indirectly wholly owned by CBRE Infra and is an affiliate of WANRack.

In Pennsylvania, GW Operating has an application pending before the Commission for authority to provide facilities-based and resold interexchange telecommunications services and Competitive Access Provider services in Docket Nos. A-2025-3059047, A-2025-3059045, and A-2025-3059048. On December 11, 2025, the Commission issued a letter that GW Operating has provisional authority to provide facilities-based and resold interexchange telecommunications services and Competitive Access Provider services in Pennsylvania. While GW Operating currently does not provide intrastate telecommunications services in any state, GW Operating is authorized to provide intrastate telecommunications services in the following states: Georgia, Idaho, Missouri, Washington, and Wyoming. Additionally, GW Operating has pending, or plans to file, applications or registrations to provide intrastate telecommunications services in twenty-three states in addition to Pennsylvania, including all states in which WANRack holds similar authority to provide intrastate telecommunications service, except Louisiana.

III. DESCRIPTION OF THE TRANSACTION

The Assignment is part of CBRE Infra’s plan to execute an internal restructuring of certain network and operations of WANRack into GW Operating. Following completion of the Assignment, WANRack will continue to provide telecommunications services to other existing

and new customers that are not a part of this internal restructuring plan.³ This plan will be implemented by assigning to GW Operating certain of WANRack's assets in Pennsylvania, including communications optical fiber, certain customer contracts, rights in third party fibers, and associated telecommunications equipment used to provision services or facilities to the affected customers. A depiction of the Transaction is included in **Exhibit A**.

To ensure seamless and uninterrupted service, all of the customers assigned to GW Operating will continue to receive service from GW Operating under the same rates, terms and conditions of service as with WANRack. Future changes in the rates, terms and conditions of service to the affected customers will be undertaken in the ordinary course of business pursuant to customer contracts and the applicable federal and state requirements. The Transaction will not disadvantage customers or cause disruption to customers since GW Operating's operations will be directed by a highly skilled team with substantial expertise and experience in the communications industry, including extensive telecommunications business, technical, and managerial expertise.

Additionally, CBRE Infra intends to undertake an internal restructuring of the intermediate ownership structure of WANRack for tax and business efficiency purposes. The Restructuring involves the removal of certain direct and intermediate entities from WANRack's ownership structure. Specifically, both WANRack Holdings and CBRE Caledon will be removed from the ownership structure of WANRack. As a result of the Restructuring, WANRack will become a direct, wholly owned subsidiary of CBRE Infra. A chart illustrating the pre- and post-Restructuring ownership structure of WANRack is included in **Exhibit A**.

³ Since WANRack will continue to provide telecommunications services to other existing customers that are not assigned to GW Operating, as well as future customers, WANRack intends to retain its Certificates to provide telecommunications services in Pennsylvania at this time.

As noted, the Restructuring will not result in any changes to the ultimate ownership or control of WANRack. Following the Restructuring, WANRack will continue to conduct its operations and provide its services as it does currently.

IV. PUBLIC INTEREST CONSIDERATIONS

The Applicants respectfully assert that the Transaction is in the public interest. The Assignment is an integral part of the Transaction that will provide support for the operations and network serving the affected customers. The Assignment will result in the assignment of customers, assets and infrastructure between affiliated companies that will continue to provide telecommunications services to such assigned customers without interruption. GW Operating will provide services at the same rates and on the same terms and conditions as provided by WANRack (subject to future changes in the ordinary course of business pursuant to applicable law and contract provisions). Given that GW Operating and WANRack share the same ultimate ownership, customers will continue to benefit from that team's knowledge and experience in the Pennsylvania market.

The Restructuring is similarly in the public interest as it involves only the removal of intermediate holding entities in the ownership chain of WANRack. Accordingly, the Restructuring will not result in any change in WANRack's management, services or its operations. The Restructuring will not change day-to-day working control of WANRack, which will continue to be overseen by its existing management team. The telecommunications services provided by WANRack and the rates, terms and conditions of those services will not change as a result of the Restructuring, and WANRack's Pennsylvania customers will not be affected in any way by the Restructuring. WANRack will continue to have the same requisite managerial, technical, and financial capabilities to provide quality communications services. To the extent customers are not

assigned to GW Operating in connection with the Assignment, WANRack's Pennsylvania customers will receive the same full range of products and services that they received prior to the Restructuring at the same prices and under the same terms and conditions.

V. REQUIRED INFORMATION PURSUANT TO 52 PA. § CODE 63.324(D)

This Application is filed as a General Rule Transaction pursuant to 52 Pa. Code § 63.324.

In accordance with 52 Pa. Code § 63.324(d), Applicants provide the following:

A. Name, address and telephone number of each party or applicant to the transaction:

WANRack Holdings, LLC ("WANRack Holdings")
4550 West 109th Street, Suite 115
Overland Park, KS 66211
Tel: 855-482-7225

CBRE Infra Fiber LLC ("CBRE Infra")
c/o CBRE Investment Management Infrastructure Inc.
120 Bremner Blvd., Suite 1100
Toronto, Ontario M5J 0A8
Tel: 416-861-0700

WANRack, LLC ("WANRack")
4550 West 109th Street, Suite 115
Overland Park, KS 66211
Tel: 855-482-7225

GW Operating LLC ("GW Operating")
2342 Technology Dr., Suite 103
O'Fallon, MO 63368
Tel: 314-585-6630

B. Government, state or territory under the laws of which each corporate or partnership applicant to the transaction is organized:

Each of WANRack Holdings, CBRE Infra, WANRack, and GW Operating is a Delaware limited liability company.

C. The name, title, post office address and telephone number of the officer or contact point, including legal counsel in this Commonwealth, to whom correspondence concerning the transaction is to be addressed:

Catherine G. Vasudevan
PA I.D. No. 210254
MORGAN, LEWIS & BOCKIUS LLP
2222 Market Street
Philadelphia, PA 19103-3007
Tel: 215-963-5000
Fax: 215-963-5001
catherine.vasudevan@morganlewis.com

With copies to:

Danielle Burt
Patricia Cave
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2541
Tel: 202-739-3000
Fax: 202-739-3001
danielle.burt@morganlewis.com
patricia.cave@morganlewis.com

and:

Craig Ceranna
Chief Financial Officer
WANRack, LLC
CBRE Infra Fiber, LLC
GW Operating, LLC
4550 West 109th Street, Suite 115
Overland Park, KS 66211
Tel: 314-585-6630
craig.ceranna@gatewayfiber.com

D. The name, address, citizenship and principal place of business of any person, party or entity that directly or indirectly owns more than 20% of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest 1%):

For details regarding the post-Restructuring corporate ownership structure of WANRack, including the entities that will directly or indirectly own 20 percent or more of WANRack, please see **Exhibit A** and **Exhibit B**. Applicants note that the Transaction will not change the ultimate control of WANRack.

E. A summary description of the transaction:

Please see Section III of this Application for a summary description of the Transaction.

F. A summary of the services and the service territories in this Commonwealth that will be affected by the transaction:

No service territories will be affected by the Transaction. WANRack will continue to provide the same services in the same locations.

G. A verified statement as to how the transaction fits into one or more of the categories subject to the general rule for notification:

The Applicants verify that the Restructuring falls into the general rule transaction category under 52 Pa. Code § 63.324(a)(2) because it involves a change of 20 percent or greater of control. Additionally, Applicants verify that the Assignment falls into the general rule transaction category under 52 Pa. Code § 63.324(a)(1) because it involves the assignment of 20 percent or greater of assets.

H. Identification of other transactions related to the transaction.

With the potential exception of GW Operating's application to provide telecommunications services in Pennsylvania, there are no jurisdictional transactions other than the Transaction described in this Application.

I. A verified statement whether the transaction warrants special consideration because either party to the transaction is facing imminent business failure:

Applicants verify that they are not facing imminent business failure and therefore are not requesting special consideration.

J. Identification of a separately filed waiver request sought in conjunction with the transaction:

No waiver request is being made with respect to the Transaction.

K. A verified statement containing facts and allegations establishing:

- i. For a merger or similar transaction, how the transaction will affirmatively promote the service, accommodation, convenience, or safety of the public in some substantial way as required by State law.
- ii. Findings that approval for a transaction subject to 66 Pa. C.S. § 1103(a) (relating to procedure to obtain certificates of public convenience) is necessary or proper for the service, accommodation, convenience, or safety of the public.
- iii. The impact of the transaction on competition.

Applicants verify the facts and allegations set forth in Section IV above, demonstrating how the Transaction will affirmatively promote the service, accommodation, convenience, or safety of the public in a substantial way, that approval of the proposed Transaction is necessary or proper for the service, accommodation, convenience, or safety of the public, and the impact of the Transaction on the promotion of service, competition, and the public interest.

Section 1103(a) of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1103(a), authorizes the Commission to issue a Certificate of Public Convenience upon a finding that “the granting the such certificate is necessary or proper for the service, accommodation, convenience or safety of the public.” In issuing the Certificate, the Commission must determine that the transaction will “affirmatively promote the service, accommodation, convenience, or safety of the public in some substantial way.” *City of York v. Pa. Pub. Util. Comm’n*, 449 Pa. 136, 151, 295A.2d 825, 828 (1972). This standard is satisfied by a simple preponderance of the evidence of benefits, and such burden can be met by showing a likelihood or probability of public benefits that need not be quantified or guaranteed. *Popowsky v. Pa. Pub. Util. Comm’n*, 594 Pa. 583, 611, 937A.2d 1040, 1057 (2007). As explained above, the Transaction will affirmatively promote the service, accommodation and convenience of the public in a substantial way. The Commission should therefore issue a Certificate of Public Convenience pursuant to Section 1103.

L. A verified statement affirming that the applicant is in compliance with Commission obligations and filings and a listing of all State and Federal proceedings when:

- i. Within the 3-year period prior to filing the application, the applicant was found to have violated either State or Federal requirements.**
- ii. Within the 3-year period prior to filing the application, the applicant is alleged to have violated either State or Federal requirements.**

Applicants verify that, to their knowledge, they are in compliance with all Commission obligations and filings; that, to their knowledge, Applicants have not been found to have violated

either State or Federal requirements over the last three years; and that, to their knowledge, they have not been alleged by any state or Federal regulatory agency to have materially violated either State or Federal requirements over the last three years.

M. A verified statement affirming that customers received prior notice. Notice shall be accomplished using a notice approved by the Commission's Bureau of Consumer Services (BCS). Any disagreement between the applicant and BCS shall be addressed by an appeal from an action of staff mirroring the process in 5.44 (relating to petitions for appeal from actions of the staff) of the Commission's rules of practice and procedure.

The Transaction will not result in any changes to the services received by customers, including rates, terms, and conditions of service. Therefore, Applicants do not intend to provide customers notice of the Transaction.

N. A verified statement containing a copy of any Commonwealth utility certificates held by the applicant:

Please see Section II in which the Applicants verify the authority held by WANRack in Pennsylvania. Neither WANRack Holdings nor CBRE Infra hold certificates or authorizations to provide telecommunications in any state. GW Operating does not hold a certificate but has provisional authority and an application pending.

O. A verified statement on the effect of the transaction on existing Commonwealth tariffs. If applicable or in response to a request from staff, an applicant shall provide a red-line document identifying changes in existing Commonwealth tariffs before and after the transaction for which the applicant seeks approval from the Commission:

Applicants verify that the Transaction will have no effect on WANRack's Pennsylvania tariffs.

P. A verified statement on the transaction's effect on the existing affiliate interest agreements of the applicant:

Applicants verify that the Transaction will have no effect on WANRack's existing affiliated interest agreements, if any.

Q. A verified statement establishing that no State or Federal regulatory agency is expected to undertake an informal or formal investigation, complaint or proceeding relating to the transaction:

Applicants verify that the Transaction will not require informal or formal investigations, complaints, or proceedings except for regulatory review processes typically required for such transactions.

R. Organizational charts showing the effect on the applicant's organization before and after the transaction:

Charts depicting the Transaction are provided in Exhibit A.

S. A copy of the application filed at the FCC or a notice filed with the US DOJ, if any, including the electronic location on the agency's website:

No application has been filed with the U.S. DOJ or FCC with respect to the change of direct and indirect ownership of WANRack.

T. A verified statement setting forth the expected public effect of the transaction on the capital structure of the applicant over the next 5 years:

Please see Section IV above in which the Applicants verify and provide a description of the public benefits of the Transaction. The Applicants further verify that the Transaction is not expected to have a negative impact on Applicants' capital structure over the next five years.

U. For an applicant subject to a broadband deployment commitment under Federal or State law, a verified statement affirming that the applicant is in compliance with that commitment:

Applicants verify that WANRack is under no Federal or State broadband deployment obligations in Pennsylvania.

V. For an applicant with eligible telecommunications carrier status under Federal and State law, a verified statement affirming that the applicant is in compliance with the law and that the applicant will continue to be in compliance with the law:

Applicants verify that WANRack is not an eligible telecommunications carrier in Pennsylvania.

W. A verified statement affirming that the transaction complies with the prohibition against cross-subsidization imposed under Federal and State law:

Applicants verify that the Transaction does not violate Federal or State cross-subsidization rules.

VI. OTHER APPROVALS, CERTIFICATES, AND/OR RELIEF

In addition to the issuance of the Certificate of Public Convenience for the general rule transaction, Applicants also request all such other approvals, certificates, registrations, and relief, if any, as may be necessary under the Public Utility Code for the Transaction described in this Application.

VII. CONCLUSION

For the reasons stated above, Applicants respectfully request that the Pennsylvania Public Utility Commission approve this Application and:

- A. Grant all authority necessary for Applicants to complete the general rule transaction pursuant to 66 Pa.C.S. §§ 1102(a) and 1103 and 52 Pa. Code § 63.324 and issue a Certificate of Public Convenience authorizing the Transaction; and
- B. Issue such other approvals, certificates, registrations, and relief under the Public Utility Code that may be required with respect to the Transaction described above.

Respectfully submitted on behalf of Applicants,

/s/ Catherine G. Vasudevan

Catherine G. Vasudevan

PA I.D. No. 210254

MORGAN, LEWIS & BOCKIUS LLP

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Philadelphia, PA 19103-3007

Tel: 215-963-5000

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catherine.vasudevan@morganlewis.com

Dated: February 3, 2026

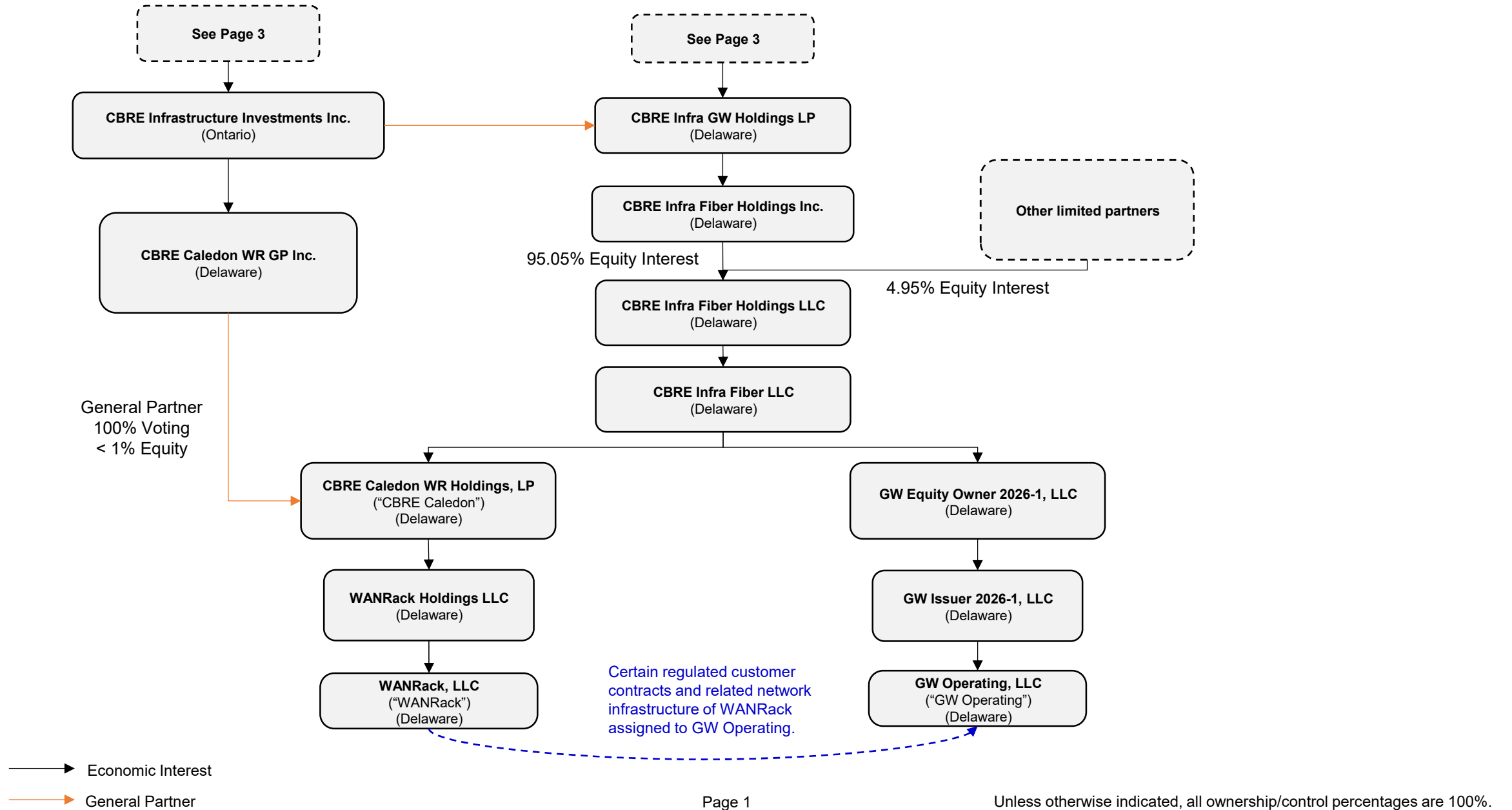
LIST OF EXHIBITS

- Exhibit A** **Depiction of the Assignment and Restructuring**
- Exhibit B** **Post-Restructuring Ownership of WANRack, LLC**

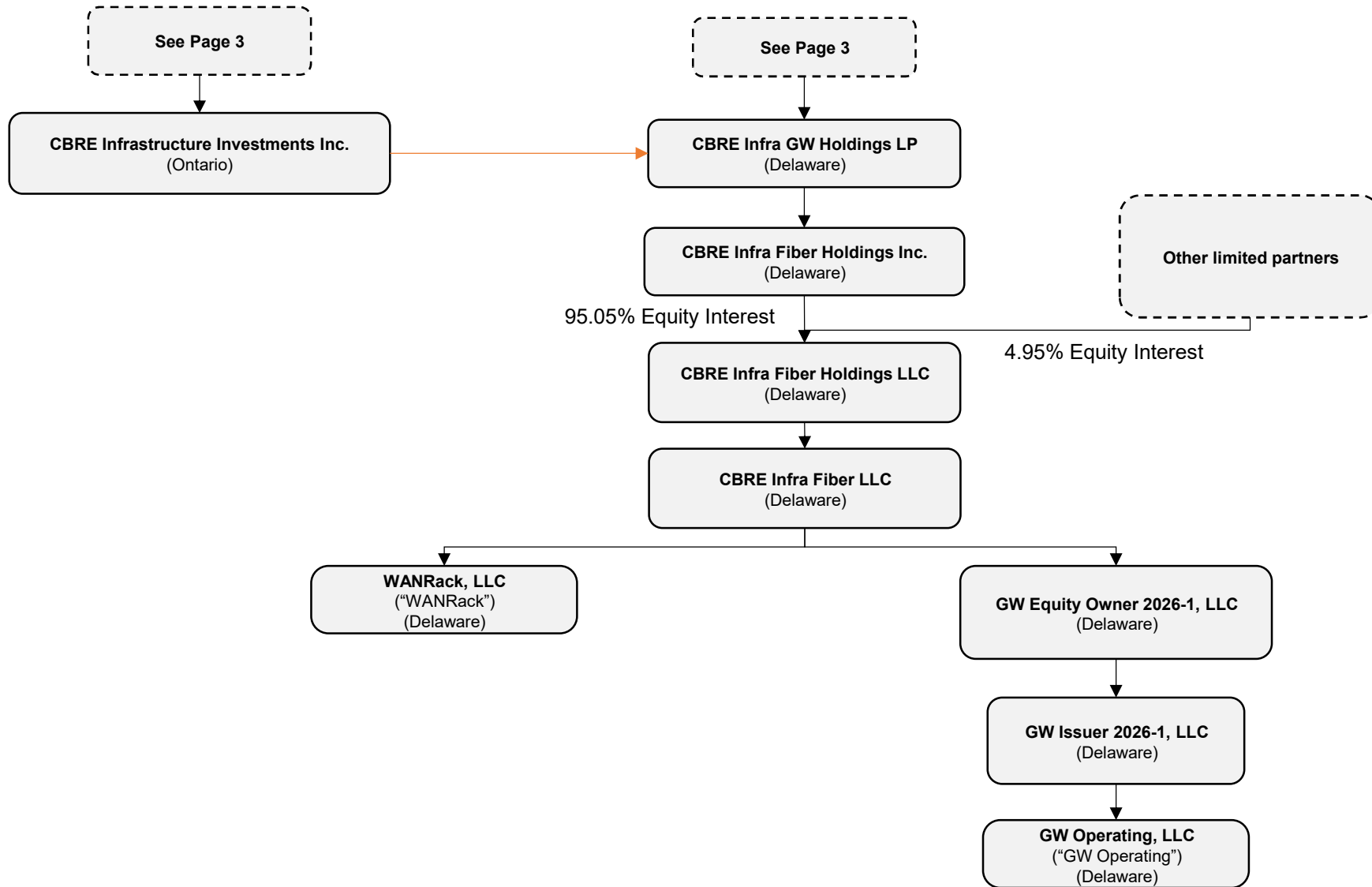
EXHIBIT A

Depiction of the Assignment and Restructuring

Current Ownership Structure and Depiction of *Pro Forma* Assignment



Post-Pro Forma Restructuring Ownership Structure



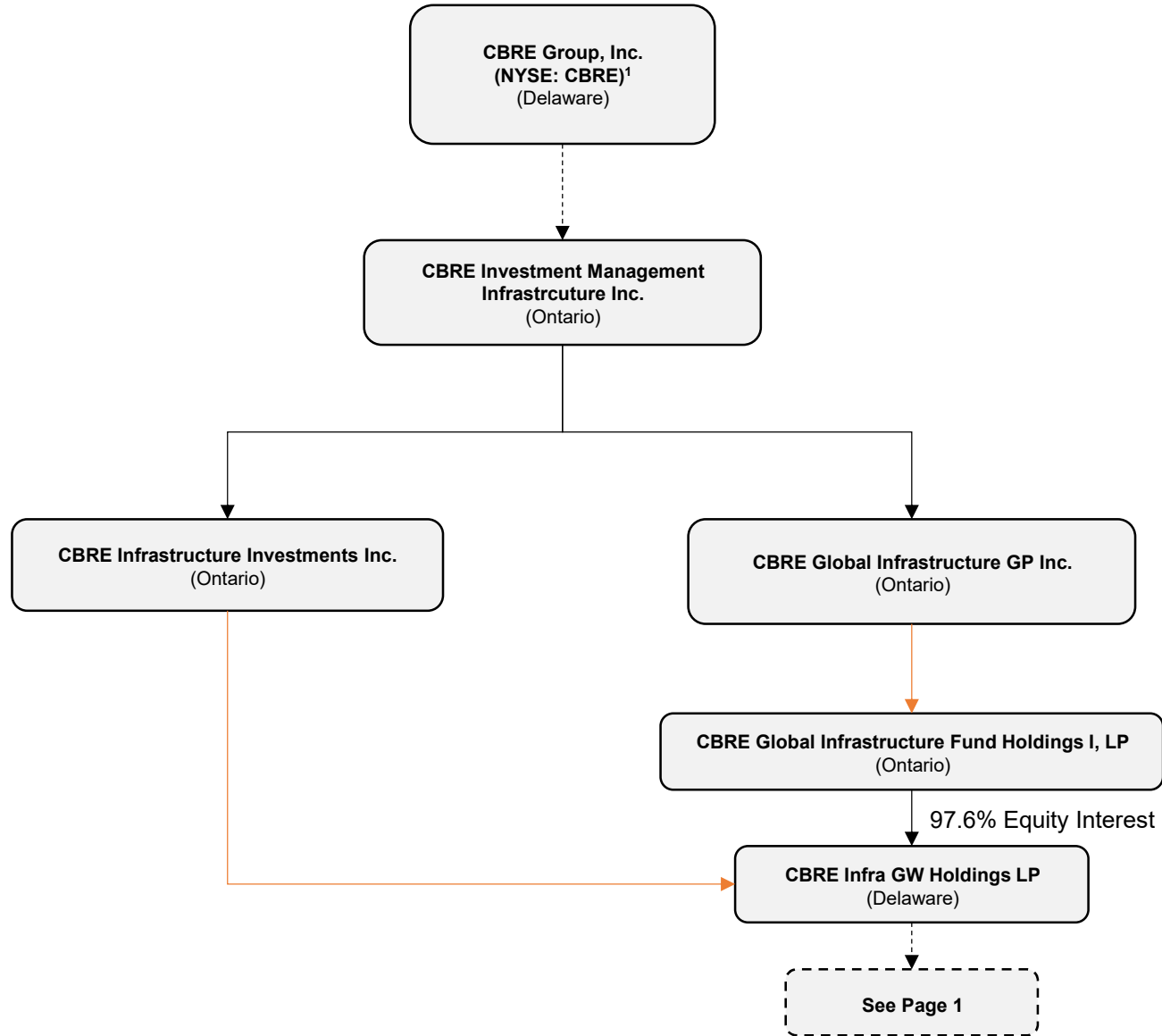
The Pro Forma Restructuring will result in the removal of WANRack Holdings LLC, CBRE Caledon WR Holdings LP and CBRE Caledon WR GP Inc. from the direct and indirect ownership structure of WANRack with no change to ultimate ownership or control of WANRack.

—▶ Economic Interest

—▶ General Partner

Ownership Structure of CBRE Infra GW Holdings LP

¹ CBRE Group, Inc.'s 100% interest is held through numerous intermediate entities.



→ Economic Interest
→ General Partner

EXHIBIT B

Post-Restructuring Ownership of WANRack, LLC

The following entities are expected to hold 20 percent or greater equity or voting interests of WANRack, LLC upon the closing of the Transaction:

CBRE Infra Fiber LLC

Address: 2342 Technology Dr, Suite 103, O'Fallon, MO 63368
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
Ownership Interest: 100% (indirectly, through sole ownership of GW Equity Owner 2026-1, LLC)

CBRE Infra Fiber Holdings LLC

Address: c/o 2342 Technology Dr, Suite 103, O'Fallon, MO 63368
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
Ownership Interest: 100% (indirectly, through sole ownership of CBRE Infra Fiber LLC)

CBRE Infra Fiber Holdings Inc. (formerly known as CCWR Holdings Inc.)

Address: c/o 2342 Technology Dr, Suite 103, O'Fallon, MO 63368
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
Ownership Interest: 95.05% (indirectly, through 95.05% member interests in CBRE Infra Fiber Holdings LLC)

CBRE Infra GW Holdings LP

Address: c/o 2342 Technology Dr, Suite 103, O'Fallon, MO 63368
Citizenship: U.S. (Delaware)
Principal Business: Holding Company
Ownership Interest: 95.05% (indirectly, through sole ownership of in CBRE Infra Fiber Holdings Inc.)

CBRE Infrastructure Investments Inc. ("CBRE Investments")

Address: c/o CBRE Investment Management Infrastructure Inc., 120 Bremner Blvd., Suite 1100, Toronto ON M5J 0A8 Canada
Citizenship: Canada (Ontario)
Principal Business: Holding Company
Ownership Interest: 100% (voting) (indirectly, as general partner of CBRE Infra GW Holdings LP)

CBRE Investment Management Infrastructure Inc. ("CBRE IM")

Address: c/o CBRE Investment Management Infrastructure Inc., 120 Bremner Blvd., Suite 1100, Toronto ON M5J 0A8 Canada

Citizenship: Canada (Ontario)
Principal Business: Holding Company
Ownership Interest: 100% (voting) (indirectly, as 100% owner of CBRE Investments)

CBRE IM is indirectly controlled by CBRE Group, Inc. (NYSE: CBRE) through numerous intermediate entities:

CBRE Group, Inc.

Address: 2121 North Pearl Street, Suite 300, Dallas, Texas 75201
Citizenship: U.S. (Delaware)
Principal Business: Commercial real estate-related services
Ownership Interest: 100% (voting) (indirectly, through numerous intermediate entities)

To the best of Applicants' knowledge, upon closing the Transaction no other entity or individual is expected to have a 20 percent or greater direct or indirect equity or voting interest in WANRack, LLC.

VERIFICATION

VERIFICATION

I, Craig Ceranna, hereby declare that I am the Chief Financial Officer of WANRack Holdings LLC, CBRE Infra Fiber LLC, WANRack, LLC, and GW Operating, LLC (collectively, the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to the Company 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 un-sworn falsification to authorities).

Dated: 1/29/2026, 2026

Signed by:

Craig Ceranna

EA2C5BF6E7AD42A...
Craig Ceranna

Chief Financial Officer
WANRack Holdings LLC
CBRE Infra Fiber, LLC
WANRack, LLC
GW Operating, LLC

CERTIFICATE OF SERVICE

I, Danielle Burt, hereby certify that on this 3rd day of February, 2026, a copy of the foregoing Application was served by first class, prepaid postage mail delivery upon the following:

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Office of Attorney General
Bureau of Consumer Protection
16th Floor, Strawberry Square
Harrisburg, PA 17120

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

/s/ Danielle Burt _____
Danielle Burt