



Secretary Matthew L. Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

April 13, 2026

RE: Comments of Archtop Fiber, LLC in response to March 12, 2026 Tentative Order
Docket No. M-2026-3059781

Dear Secretary Homsher:

Please accept this letter as the Comments of Archtop Fiber, LLC (“Archtop”) in response to the Tentative Order issued by the Pennsylvania Public Utility Commission (“Commission”) in the above-referenced docket. Archtop acknowledges that it reported zero intrastate telecommunications revenue in its 2024 annual assessment report, but respectfully submits that cancellation of its Certificate of Public Conveniences (“CPC”) is not appropriate.

Archtop’s CPCs were issued by the Commission on September 19, 2023 in Docket Nos. A-2022-3037041, A-2022-3037043 and A-2022-3037044. Archtop’s intention at the time of acquiring its CPCs was to construct a fiber network to serve its customers, as indicated in its Application for CPCs. Archtop obtained its CPCs in contemplation of the Company’s planned participation in Pennsylvania’s broadband expansion programs, including anticipated grant and subsidy opportunities under the federal Broadband Equity, Access, and Deployment (BEAD) program. The Company obtained its CPCs to ensure regulatory authority would be in place prior to applying for funding and commencing construction and service deployment.

Archtop has been awarded a provisional BEAD grant by the Pennsylvania Broadband Development Authority, as confirmed by Attachment A hereto. The extended timing of the BEAD program development, rulemaking, and funding availability has delayed the Company’s anticipated service launch within the Commonwealth. As a result, Archtop did not recognize intrastate operating revenue during calendar year 2024 or 2025, not due to a cessation of operations, but due to the timing of regulatory approvals and program implementation outside of the Company’s control.

Archtop continues to maintain its intent to operate as a jurisdictional telecommunications provider in Pennsylvania and obtained its CPCs for the purpose of becoming an operating carrier once program timelines and funding awards permit service deployment. The absence of intrastate operating revenue during the year reflects the pre-revenue nature of our plans rather than inactivity or abandonment of the requested authority.

Archtop will report intrastate operating revenue in future assessment filings as operations commence. If the Commission requires additional documentation or clarification regarding Archtop's operational status, the Company will promptly provide it.

Respectfully submitted,
Kevin Culver
VP Finance
Archtop Fiber

ATTACHMENT A

Pennsylvania Broadband Equity, Access and Deployment (BEAD) Program

Provisional Grant Approvals | Statewide

Overview

The Broadband Equity, Access, and Deployment (BEAD) Program is a competitive grant program funded under the National Telecommunications and Information Administration (NTIA) established by the Infrastructure Investment and Jobs Act of 2021.

On February 9, 2026, the NTIA approved the PBDA's BEAD Final Proposal, which provides a list of provisionally approved projects for funding under the BEAD program. The proposal will now proceed through the National Institute of Standards and Technology (NIST) as part of the notice of award preparation process.

BEAD Program Provisional Grant Approvals

Applicant	Total Locations	Technology Type	Approved Amount
Advanced Telephone	12	Fiber	\$17,229
Amazon LEO	20,408	LEO	\$12,244,800
Archtop Fiber	637	Fiber	\$3,772,466
Armstrong Cable	3,425	Fiber	\$19,898,209
Central Bradford Progress Authority	6,457	Fiber/Licensed Fixed Wireless/Unlicensed Fixed Wireless	\$73,574,097
Centre WISP Venture Company	1,861	Fiber	\$10,298,757
Claverack	1,247	Fiber	\$9,046,250
Comcast Cable Communications	15,611	Fiber/Hybrid-Fiber Coaxial	\$162,138,474

Applicant	Total Locations	Technology Type	Approved Amount
Commonwealth Telephone Company d/b/a Frontier Communications	3,800	Fiber	\$28,534,579
Connect Holdings d/b/a Brightspeed	9,078	Fiber	\$41,710,873
Consolidated Communications	136	Fiber	\$1,074,372
CoreConnect	10,327	Fiber	\$90,661,771
County of McKean	683	Fixed Wireless	\$5,952,460
eCommunity	14,589	Fiber	\$84,265,635
IBT Group USA, LLC	15,283	Fixed Wireless	\$39,684,764
INTUS Smartcities Inc	629	Fiber	\$4,281,461
SpaceX	9,476	LEO	\$11,024,872
Upward Broadband LLC	1,212	Fixed Wireless	\$2,582,234
Verizon	14,297	Fiber	\$108,804,695
VitaLink	188	Fiber	\$1,727,845