

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Cancellation of Certificates of Public Convenience for Telecommunication Utilities; Failure to Operate or Report Any Intrastate Operating Revenue : M-2026-3059781

**Comments of SQF, LLC regarding the
Tentative Order Issued March 12, 2026**

On March 12, 2026, the Pennsylvania Public Utility Commission (“Commission”) adopted a Tentative Order at the above-captioned docket, proposing to cancel **SQF, LLC**’s (“SQF”) Certificate of Public Convenience (“CPC”) to operate as a Competitive Access Provider (“CAP”).¹ The Tentative Order concluded that CPC cancellation is tentatively approved as being in the public interest for each telecommunications utility that has (1) failed to report any intrastate operating revenue to the Commission for calendar year 2024; or (2) reported zero intrastate revenue to the Commission for calendar year 2024. SQF filed the required annual assessment report for 2024 revenue but reported zero intrastate operating revenue that year. The Tentative Order further provided for the submission of Comments to challenge the tentative approval of CPC cancellations within 20 days of the date the Tentative Order is published in the Pennsylvania Bulletin. Such publication occurred on March 28, 2026, and thus Comments are due on or before April 17, 2026. These Comments, therefore, are timely filed.

SQF submits these Comments to challenge the tentative determination that cancellation of SQF’s CPCs is in the public interest. Since obtaining its CPC as a CAP, SQF has undertaken the

¹ See *Application of SQF, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public as a Competitive Access Provider in the Commonwealth of Pennsylvania*, Docket No. A-2015-2490501, (effective Dec. 18, 2015).

steps necessary to provide its services to customers in Pennsylvania. SQF's core business involves providing dedicated telecommunications transmission services and ancillary infrastructure on a wholesale basis to other carriers, including broadband providers and commercial mobile radio service providers, who incorporate SQF's wholesale services as inputs to the finished services they provide to Pennsylvania consumers and businesses. SQF primarily deploys its own facilities but also uses third party facilities where most efficient. SQF, however, does not and will not provide services directly to residential customers.

Given the competitive market for telecommunications services in Pennsylvania, possession of its CAP certificate from the Commission was and remains the linchpin of SQF's ability to provide service in the Commonwealth. In particular, utilities and pole owners almost always require proof of certification from the Commission in order for SQF to obtain access to pole attachments and conduit in order to deploy facilities. Further, local governments will insist on proof of a CPC in order for SQF to obtain access to public rights of way. Access to this infrastructure is critical to SQF and other similarly situated providers.

To date, SQF's service offerings, as set forth in its CAP Tariff, include intrastate services. And despite its efforts to secure from its customers contracts to include the provision of interstate and intrastate services, up until 2025, SQF's Pennsylvania customers had only ordered interstate services. SQF's certification as CAP should not hinge on whether customers elect to subscribe to its intrastate services, as the Pennsylvania market is extremely competitive and customers have a wide array of options from which to choose.

Nonetheless, SQF has entered into agreements with its customers in 2026 and SQF's Annual Report for 2027 will reflect that in 2026, SQF generated intrastate telecommunications revenue and expects to continue to do under its customer agreements. Cancelling SQF's CPC will

harm the public interest because, amongst other things, (1) it would have to discontinue providing services to its customers whom it has already contracted with and (2) only established providers with intrastate revenue will be competitive bidders for telecommunications services contracts and serve customers in the Commonwealth while new entrants without a CPC, like SQF if its CPC is cancelled, will have difficulty securing telecommunications services contracting opportunities in Pennsylvania and thus depriving Pennsylvania businesses and consumers the benefits of competition. For these reasons, the Commission should not cancel SQF's CPC for CAP services.

Respectfully submitted,

/s/ Catherine G. Vasudevan

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Dated: April 16, 2026

VERIFICATION

I, Lauren Ramirez, state that I am the General Counsel of SQF, LLC (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 thereof with respect to the Company and its affiliates are true and correct to the best of my knowledge, information, and belief. 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: April 14, 2026

Lauren Ramirez

Lauren Ramirez
General Counsel
SQF, LLC