

ATTACHMENT 1

Notification of *Pro Forma* Transfer of Control of International Section 214 Authorization

Pursuant to Section 214 of the Communications Act of 1934, as amended, and Section 63.24(f) of the Commission's rules,¹ the Commission is hereby notified of an internal reorganization that resulted in the *pro forma* transfer of control of Valstar, Inc. ("Valstar") and its international Section 214 authorization. The internal reorganization, which occurred on July 1, 2026, did not result in a change in the ultimate control of Valstar or its international Section 214 authorization.

Additional information responsive to FCC Form 214-TC regarding the *pro forma* transfer of control of Valstar is set forth below.

Response to Items 19 and 25

Pursuant to Section 63.18(h) of the Commission's rules, the following entities currently directly or indirectly hold a ten percent or greater voting or equity interest in, or control, Valstar following the internal reorganization.

Name: The Germantown Telephone Company, Inc.
Address: 210 Main Street, PO Box 188
Germantown, NY 12526
Citizenship: New York
Principal Business: Operating company
Ownership interest: 100% voting and equity interest in Valstar

Name: Archtop Fiber LLC
Address: 300 Enterprise Drive
Kingston, NY 12401
Citizenship: Delaware
Principal Business: Holding company
Ownership interest: 100% voting and equity interest in The Hancock Telephone Company, Inc.

Name: Archtop Fiber Intermediate LLC
Address: 300 Enterprise Drive
Kingston, NY 12401
Citizenship: Delaware
Principal Business: Holding company
Ownership interest: 100% voting and equity interest in Archtop Fiber LLC

¹ 47 U.S.C. § 214; 47 C.F.R. § 63.24(f).

Name: Archtop Fiber Parent LLC
Address: 300 Enterprise Drive
Kingston, NY 12401
Citizenship: Delaware
Principal Business: Holding company
Ownership interest: 100% voting and equity interest in Archtop Intermediate Fiber LLC

Name: Archtop Fiber Holdings LLC (Transferor and Transferee)
Address: 300 Enterprise Drive
Kingston, NY 12401
Citizenship: Delaware
Principal Business: Holding company
Ownership interest: 100% voting and equity interest in Archtop Fiber Parent LLC

Name: Post Road Digital Infrastructure Fund I LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 98.7% voting and equity interest in Archtop Fiber Holdings LLC

Name: Post Road Digital Infrastructure Fund I LP
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 98.7% voting and equity interest in Post Road Digital Infrastructure Fund I LLC

Name: Post Road DIF I GP LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 50.5% voting interest in Post Road Digital Infrastructure Fund I LP

Name: Post Road Special Opportunity Fund II
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 12.73% equity interest in Post Road Digital Infrastructure Fund I LP²

Name: Post Road Special Opportunity Fund II Offshore LP
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Cayman Islands
Principal Business: Investment company
Ownership interest: 12.73% voting interest in Post Road Digital Infrastructure Fund I LP³

Name: Post Road SOF GP II LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 12.73% indirect interest in Post Road Digital Infrastructure Fund I LP via general partner interest in Post Road Special Opportunity Fund II and Post Road Special Opportunity Fund II Offshore LP⁴

Name: CC Cove LP
Address: 345 Park Avenue, 41st Floor
New York, NY 10154
Citizenship: Bermuda
Principal Business: Investment company
Ownership interest: 9.23% equity interest in Post Road Digital Infrastructure Fund I LP; 2.3% equity interest Post Road Special Opportunity Fund II (an aggregate 11.53% indirect equity interest in Valstar)

² Combined interest held with Post Road Special Opportunity Fund II Offshore LP. The equity interest in Post Road Digital Infrastructure Fund I LP held solely by Post Road Special Opportunity Fund II is 7.81%.

³ Combined interest held with Post Road Special Opportunity Fund II. The equity interest in Post Road Digital Infrastructure Fund I LP held solely by Post Road Special Opportunity Fund II Offshore LP is 4.92%.

⁴ Post Road SOF GP II LLC holds its indirect equity interest in Licensees as a result of its role as the general partner of Post Road Special Opportunity Fund II and Post Road Special Opportunity Fund II Offshore LP.

Name: OPTrust Infrastructure Direct N.A. VII Inc.
Address: 1 Adelaide St. East, Suite 1200
Toronto, ON M5C 3A7
Citizenship: Ontario, Canada
Principal Business: Investment company
Ownership interest: 49.5% voting and equity interest in Post Road Digital Infrastructure Fund I LP

Name: OPSEU Pension Plan Trust Fund
Address: 1 Adelaide St. East, Suite 1200
Toronto, ON M5C 3A7
Citizenship: Ontario, Canada
Principal Business: Public pension fund
Ownership interest: 100% voting and equity interest in OPTrust Infrastructure Direct N.A. VII Inc.

Name: PRG Investment Holdings LP
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 100% voting and equity interest in Post Road DIF I GP LLC

Name: Post Road Group Holdings LP
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 100% voting and 80% equity interest in PRG Investment Holdings LP

Name: Post Road Group GP LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 100% voting general partner interest in Post Road Group Holdings LP

Name: Seventh Avenue Capital Group LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 50% voting and equity interest in Post Road Group GP LLC

Name: Seventh Avenue Capital Group II LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 45% equity interest in Post Road Group Holdings LP

Name: Kevin Davis
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: United States
Principal Business: Investor
Ownership interest: 100% voting and equity interests in Seventh Avenue Capital Group LLC and Seventh Avenue Capital Group II LLC

Name: Birch Hill Capital LLC
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: Delaware
Principal Business: Investment company
Ownership interest: 50% voting and equity interest in Post Road Group GP LLC, and 45% equity interest in Post Road Group Holdings LP

Name: Michael Bogdan
Address: 1 Landmark Square
Stamford, CT 06901
Citizenship: United States
Principal Business: Investor
Ownership interest: 100% voting and equity interest in Birch Hill Capital LLC

No other individual or entity holds a 10 percent or greater direct or indirect voting or equity interest in, or controls, Valstar.

Response to Items 21 and 32

The information and certifications required by 47 CFR § 63.18(i) through (m) are as follows:

- (i) Neither Valstar nor Transferee is a foreign carrier, nor are they affiliated with a foreign carrier.
- (j) Neither Valstar nor Transferee seeks to provide international telecommunications services to any destination country in which: (1) it is a foreign carrier in that country; (2) it controls a foreign carrier in that country; (3) any entity that owns more than 25% of the company, or that controls the company, controls a foreign carrier in that country; or (4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25% of the company and are parties to, or the

beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

(k) Not applicable.

(m) Not applicable.

Response to Items 16, 24, and 28

An internal reorganization was undertaken on July 1, 2026, that resulted in the *pro forma* transfer of control of Valstar and its international Section 214 authorization. Specifically, a new intermediate holding company (Archtop Fiber Parent LLC) was inserted into the Valstar ownership chain.

Exhibit A includes charts depicting Valstar's ownership prior to and after the internal reorganization. As Valstar remains under the control of Post Road Group, a private equity investment firm, the internal restructuring was *pro forma* in nature.⁵ Moreover, together with all previous *pro forma* transactions, the internal reorganization does not result in a change in Valstar's ultimate control. The internal reorganization also is in the public interest as it facilitates continued support and investment in Valstar and its provision of services, and it will not result in any public interest harms.⁶

Response to Item 18

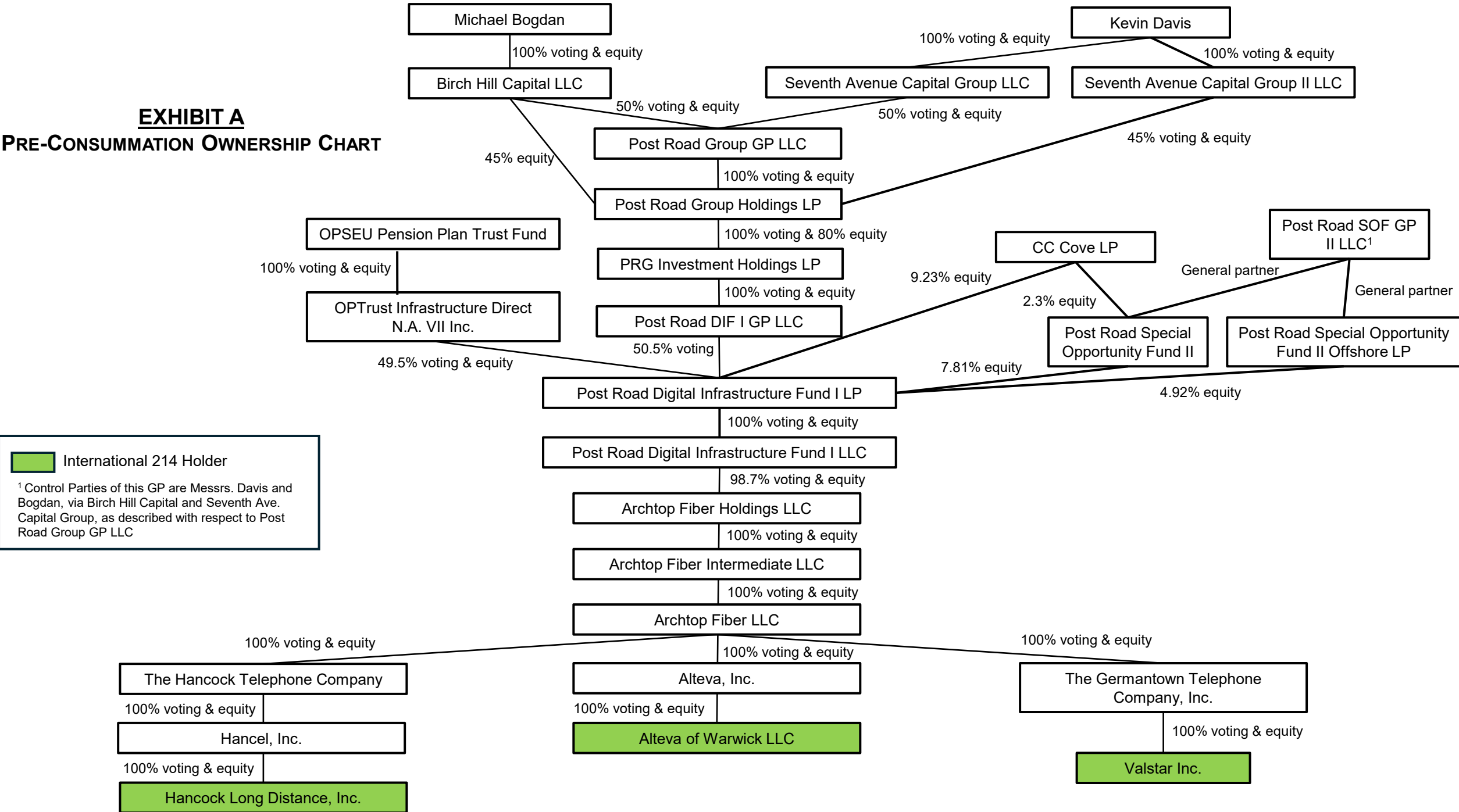
The internal reorganization described herein is *pro forma*, and thus is excluded from referral to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector pursuant to Section 1.40001(a)(2)(i) of the Commission's rules.⁷

⁵ *Communications Bar Ass'n's Petition for Forbearance from Section 310(d) of the Communications Act*, Memorandum Opinion and Order, 13 FCC Rcd 6293 ¶ 42 (1998) (concluding that a "corporate reorganization which involves no substantial change in the beneficial ownership of the corporation" is *pro forma* in nature).

⁶ See *1998 Biennial Review – Review of International Common Carrier Regulations*, Report and Order, 14 FCC Rcd 4909 ¶ 42 (1999) (finding that "[r]egulatory review of [*pro forma*] transactions yields no significant public interest benefits, but may delay or hinder transactions that could provide substantial financial, operational, or administrative benefits for carriers").

⁷ 47 C.F.R. § 1.40001(a)(2)(i).

EXHIBIT A
PRE-CONSUMMATION OWNERSHIP CHART



 International 214 Holder

¹ Control Parties of this GP are Messrs. Davis and Bogdan, via Birch Hill Capital and Seventh Ave. Capital Group, as described with respect to Post Road Group GP LLC

EXHIBIT A

POST-CONSUMMATION OWNERSHIP CHART

New Intermediate Entity

International 214 Holder

¹ Control Parties of this GP are Messrs. Davis and Bogdan, via Birch Hill Capital and Seventh Ave. Capital Group, as described with respect to Post Road Group GP LLC

