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March 31, 2015

VIA OVERNIGHT DELIVERY

Gary L. Widerbury, Commission Secretary
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

**Re: Notification of Crown Castle NG West LLC and NewPath Networks, LLC
Regarding a *Pro Forma* Change in Indirect Ownership**

Dear Mr. Widerbury:

Crown Castle NG West LLC (“CCNG-West”) and NewPath Networks, LLC (“NewPath”) (together, the “Parties”), by undersigned counsel, notify the Commission of a *pro forma* change in their indirect ownership that occurred in connection with the conversion of the Parties’ ultimate, publicly held, parent company (“Holdco”) into a publicly held real estate investment trust (“REIT”). While the *pro forma* change resulted in a change to the ultimate parent of the Parties, the *pro forma* change did not result in a change to their direct parents or ultimate owners (i.e., the shareholders of Holdco). The Parties understand that Commission approval is not required for the *pro forma* change described herein. Accordingly, the Parties submit this letter for informational purposes.

Description of the Parties

CCNG-West is a Delaware limited liability company and NewPath is a New Jersey limited liability company. The Parties are indirect wholly owned subsidiaries of Crown Castle Solutions Corp. (“Solutions”), a Delaware corporation. Solutions is a direct wholly owned subsidiary of Crown Castle Operating Company (“CCOC”), a Delaware corporation and direct wholly owned subsidiary of Crown Castle International Corp. (formerly known as Crown Castle REIT Inc. and the surviving entity of the REIT Transaction described below) (“REIT-Parent” and, collectively with its subsidiaries, “Crown Castle”). REIT-Parent is currently a publicly traded (NYSE: CCI) Delaware corporation that, to its knowledge, does not have any 10% or greater owners. Crown Castle has executive offices at 1220 Augusta Drive, Suite 600, Houston, Texas 77057-2261. REIT-Parent, through certain of its indirect subsidiaries, owns, operates, leases, and manages

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over 39,600 towers and rooftop sites for wireless communications with a significant presence in the top 100 U.S. markets. Solutions and its subsidiaries, including the Parties, have deployed approximately 14,000 distributed antenna system (“DAS”) small cell nodes supported by approximately 7,000 miles of fiber. Wholly owned subsidiaries of Solutions hold authorizations to provide intrastate telecommunications services in the District of Columbia and every state except Alaska, Maine, Montana, South Dakota, Vermont, and Wyoming. In Utah, Solutions has two subsidiaries authorized to provide telecommunications services: CCNG-West is authorized to provide public telecommunications services in Utah pursuant to Certificate issued in Docket No. 04-2445-01; and NewPath is authorized to provide distributed antenna system services pursuant to a Certificate issued in Docket No. 09-2512-01. The Parties are also authorized by the FCC to provide interstate telecommunications services.

Additional information concerning the Parties’ legal, technical, managerial and financial qualifications has been submitted to the Commission with various prior filings with respect to various transactions and is therefore already a matter of public record. The Parties request that the Commission take official notice of these existing descriptions of the Parties’ qualifications and incorporate them by reference herein. The Parties do not maintain financial statements separate from the consolidated financial statements of REIT-Parent (and its predecessor in interest). The financial statements from Holdco’s most recent SEC Forms 10-K and 10-Q are available at <http://investor.crowncastle.com/phoenix.zhtml?c=107530&p=irol-sec>. Biographies of REIT-Parent’s management team can be found at <http://www.crowncastle.com/leadership.aspx>.

Contacts

For the purposes of this filing, contacts are as follows:

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Description of the Pro Forma Change

A *pro forma* change to the ultimate parent of the Parties occurred on December 15, 2014, in connection with the conversion of Holdco into a REIT. Specifically, in order to facilitate compliance with the rules governing real estate investment trusts by ensuring the effective adoption of certain charter provisions that implement ownership limitations and transfer restrictions related to its capital stock, (1) REIT-Parent was formed as a direct wholly owned

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subsidiary of CCNG-East's prior ultimate parent company that was also named Crown Castle International Corp. ("Predecessor-CCIC"), and then (2) REIT-Parent merged with and into Predecessor-CCIC, whereupon the separate existence of Predecessor-CCIC ceased and REIT-Parent was the surviving entity (the "*Pro Forma* Change" or "REIT Transaction"). The name of REIT-Parent was then changed to "Crown Castle International Corp." The ultimate owners of the Parties (i.e., the shareholders of Holdco) did not change since the shareholders of Predecessor-CCIC automatically converted to shareholders of REIT-Parent in the REIT Transaction. Further, the direct parent companies of the Parties did not change. For the Commission's reference, charts depicting the pre- and post-REIT Transaction corporate ownership structure of the Parties are provided as Exhibit A. The REIT Transaction was entirely transparent to the Parties' customers and did not result in any change in their services. In particular, the rates, terms and conditions of their services did not change as a result of the purely *pro forma* change to the Parties' indirect ultimate parent.

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An original and five (5) copies of this letter are enclosed for filing. Also enclosed is a CD-ROM containing an electronic version of this letter in MSWord and PDF formats. Please date-stamp the enclosed extra copy and return it in the envelope provided. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

Catherine Wang
Brett P. Ferenchak

Counsel to the Parties

EXHIBIT A

Pre- and Post-REIT Transaction Corporate Structure

Verification