

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

11/24/25

08:00 AM

A2511007

Application of CitySwitch Tower, LLC for
a certificate of public convenience and
necessity to provide full facilities-based
and resold competitive local exchange
service and interexchange services

Application No. _____

APPLICATION OF CITYSWITCH TOWER, LLC FOR
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
PURSUANT TO PUBLIC UTILITIES CODE SECTION 1001

(PUBLIC)

Dated: November 21, 2025

Suzanne Toller
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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

CPCN Application Form Pursuant to Public Utilities Code Section 1001

1. APPLICANT INFORMATION

Applicant Name: CitySwitch Tower, LLC
Business Address: 3715 Northside Parkway NW, Suite 1-200, Atlanta, GA 30327
Telephone No.: (414) 403-4927
E-mail Address: kevin.saso@cityswitch.com

1.a. Principal Place of Business: (if different from address above)

same as above

1.b. List all fictitious business names under which Applicant has done business in the last five years:

N/A

1.c. Applicant is (check one only)

- | | |
|--|---|
| ☐ Corporation (Inc) | ☐ General Partnership |
| ☐ Limited Partnership (LP) | ☐ Sole Proprietor |
| ☒ Limited Liability Company (LLC) | ☐ Trust |
| ☐ Other, specify: | |

Attach **Appendix A** with the following: 1) a copy of the entity's organizing documents; and (2) a copy of its Certificate of Good Standing Status certified by the California Secretary of State and /or additional evidence of the Applicant's qualification to transact business in California.

1.d. FCC Registration No.: 0026497602

1.e CSOS Entity No.: 202359513802

1.f. Applicant has a foreign ownership interest

☒ NO ☐ YES, Foreign entity interest:

2. APPLICANT REGISTERED AGENT FOR SERVICE OF PROCESS

Agent Name: Paracorp Incorporated
Address: 2140 S Dupont Highway, Camden, DE 19934
Telephone No.: 888-372-7273

3. APPLICANT LEGAL DOMICILE (check one only)

☐ California ☒ Other, specify: Delaware

4. APPLICANT PROPOSED SCHEDULE OF PROCEEDING (check all that apply)

Ratesetting	DATE(s)	Other Proposed Schedule	DATE(s)
☒ Prehearing Conference		☐ 45 days after app	
☒ Scoping Memo		☐ 60 days after app	
☐ Testimony (Optional)		☐	
☐ Briefing (Optional)		☐	
☐ Evidentiary Hearing (Optional) (Appendix B)		☐	
☒ Proposed Decision		☐	

If Evidentiary Hearing is selected, attach **Appendix B** describing the issues which require hearing and length of hearing needed.

5. WHAT ISSUES ARE THERE TO BE RESOLVED IN THIS APPLICATION?

(check all that apply)

- ☒ Whether this application meets all state and California Public Utilities Commission (Commission) requirements for a certificate of public convenience and necessity (CPCN), including but not limited to financial, technical, and California Environmental Quality Act (CEQA) requirements.
- ☒ Whether the proposed construction is eligible for the Commission's 21 day expedited process for CEQA review.
- ☐ Consideration of a safety issue. (Provide a description of the issue below.)

- ☐ Consideration of an Environmental and Social Justice (ESJ) issue. (Provide a description explaining the ESJ issue for resolution. Otherwise, Applicant attests that there is no ESJ issue for consideration in this Application.)
- ☐ Other (Provide a description of the issue(s) below.)

6. APPLICANT WILL OPERATE AS (check all that apply)		
☒ Competitive Local Exchange Service Provider	☒ Interexchange (Intra/Inter-LATA) Service Provider	☐ Fixed Interconnected Voice over Internet Protocol (VoIP) Service Provider
6.a. Proposed Facilities ☒ Full Facilities-Based ☐ Limited Facilities-Based ☐ Switchless-Reseller/Non-Facilities-Based	6.b. Proposed Facilities ☒ Full Facilities-Based ☐ Limited Facilities-Based ☐ Switchless-Reseller/Non-Facilities-Based	6.c. Proposed Facilities ☐ Full Facilities-Based ☐ Limited Facilities-Based ☐ Non-Facilities-Based
6.d. Service Territories ☒ Within ALL the service territories of uniform regulatory framework incumbent local exchange carrier ☐ Within ALL the service territories of the small incumbent local exchange carrier ☐ In specific portions of the state only (Appendix C)	6.e. Service Territories ☒ Throughout the state of California. ☐ In specific portions of the state only (Appendix C)	6.f. Service Territories ☐ Within the service territories of uniform regulatory framework incumbent local exchange carriers ☐ Within the service territories of small incumbent local exchange carrier ☐ In specific portions of the state only (Appendix C)
Applicant that <i>only</i> selected non-Facilities-based for Proposed Facilities (Section 6.a, 6.b. and 6.c.) is not required to respond to Section 11 and 12 of the CPCN Application form. If no facilities are proposed, Applicant may be eligible to use the 1013 registration process pursuant to Pub. Util. Code Section 1013. Attach Appendix C to include a list of the specific portion(s) or geographical location(s) of the State, and/or ILEC territory(ies); and a copy of the map(s). Applicant seeking to operate in any Small Incumbent Local Exchange Carriers territories must meet the requirements contained in Appendix A of D.20 08 011.		

7. DATE APPLICANT EXPECTS TO BEGIN OR HAS BEGUN OFFERING SERVICE(S) IN CALIFORNIA (If already operating in California, attach **Appendix D**)

04/01/26

8. APPLICANT WILL PROVIDE THE FOLLOWING SERVICES IN CALIFORNIA
(check all that apply)

- ☐ Provide voice services (traditional wireline and/or Fixed Interconnected VoIP) directly to customers
- ☒ Build facilities which will transmit or facilitate voice services (traditional wireline and/or Interconnected VoIP) through third parties.
- ☐ Other (Describe below other services applicant offers, whether or not they are within Commission's jurisdiction.)

9. SWORN AFFIDAVIT

☒ TRUE ☐ NOT TRUE (**Appendix E**)

Neither Applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or anyone acting in a management capacity for Applicant: (a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of Sections 17000 et seq., 17200 et seq., or 17500 et seq. of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; and/or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

Attach **Appendix E** if Applicant's response to this section is anything other than an unqualified "True." Applicant must declare exceptions by attaching documentation and describing any such bankruptcies, findings, judgments, convictions, referrals, denials, suspensions, revocations, limitations, settlements, voluntary payments or any other type of monetary forfeitures.

9.a. List of all affiliated entities (Attach **Appendix F**)

10. APPLICANT HAS THE REQUIRED MANAGERIAL AND TECHNICAL EXPERTISE TO OPERATE AS A SERVICE PROVIDER OF THE TYPE INDICATED IN SECTION 6 OF THIS FORM.

☒ TRUE

Attach **Appendix G** with the following: 1) List of the names, titles, and street addresses of all officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed, and 2) all resumes for each personnel identified listing all employment for each officer, director, partner, agent, or owner (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed.

10.a. APPLICANT ATTESTATION

☒ TRUE ☐ NOT TRUE (**Appendix H**)

To the best of Applicant's knowledge, neither Applicant, any affiliate, officer, director, partner, nor owner of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

Attach **Appendix H** if Applicant's response to this section is anything other than an unqualified "True." Applicant must declare exceptions by attaching documentation and describing all such investigations, whether pending, settled voluntarily or resolved in another manner.

11. CONSTRUCTION OR EXTENSION OF FACILITIES FOR LIMITED AND FULL FACILITIES-BASED APPLICANTS ONLY.

☒ YES. Attach **Appendix I** that includes all responses to 11.a. thru 11.j.

11.a. Description of proposed construction activities, documentation attached.

11.b. List of competing entities

11.c. Map showing proposed construction

11.d. Statement of franchises and health and safety permits

11.e. Facts showing public convenience and necessity requiring the proposed construction.

11.f. Statement showing cost of construction.

11.g. Statement showing financial ability to render service.

11.h. Statement showing proposed rates.

11.i. Annual Report Statement.

11.j. Estimated number of customers in the first and fifth years in the future

12. APPLICANT'S PROPOSED FULL FACILITIES ARE LIKELY ELIGIBLE FOR A CATEGORICAL EXEMPTION FROM CEQA AND APPLICANT REQUESTS TO UTILIZE THE ENERGY DIVISION'S 21-DAY EXPEDITED CEQA REVIEW PROCESS.

☒ YES. Attach **Appendix J** with list of categorical exemptions and briefly explain the applicability of each exemption to the proposed construction.

☐ NO. Attach **Appendix J** with Preliminary Environmental Assessment.

13. FINANCIAL REQUIREMENT

☒ TRUE

Applicant has a minimum of (a) \$25,000 in the case of a switchless reseller/ non facilities based OR (b) \$100,000 in the case of a Facilities-Based (Full and/or Limited), in each case reasonably liquid and available to meet the firm's first year expenses, including an additional \$25,000 for deposits which may be required by local exchange carriers or interexchange carriers; OR (c) has profitable interstate operations to generate the required cash flow.

Attach **Appendix K** containing a financial instrument pursuant to Appendix F of D.24-11-003 that demonstrates the Applicant's financial ability as required above.

14. APPLICANT IS ELIGIBLE AND SEEKS AN EXEMPTION FROM TARIFFING REQUIREMENTS

☒ TRUE ☐ NOT TRUE (Attach **Appendix L** with Applicant's Draft Initial Tariff)

15. OTHER LICENSE(S) HELD WITH THE COMMISSION, EITHER CURRENT AND/OR PRIOR

☒ NONE

☐ CURRENT AND/OR PRIOR, specify:

16. PERFORMANCE BOND REQUIREMENT

☒ TRUE

Applicant attests that, upon approval of its request, it will comply with the California Public Utilities Commission's performance bond requirements in accordance with Decision (D.) 10-09-017, D.11-09-026, D.13-05-035 and D.24-11-003.

I hereby declare under penalty of perjury under the laws of the State of California that the forgoing information, and all attachments, are true, correct, and complete to the best of my knowledge and belief after due inquiry, and that I am authorized to make this application on behalf of the Applicant named above.

Signed



Name David Mueller

Title Secretary & Treasurer

Dated 11/20/25

Address 3715 Northside Parkway Suite 1-200
Atlanta, GA 30327

Telephone 404-312-7762

Email Address david.mueller@cityswitch.com

ATTACHMENT A

SWORN AFFIDAVIT

Name of Applicant/Company: CitySwitch Tower, LLC

My name is David Mueller. I am the Secretary & Treasurer of CitySwitch Tower, LLC. My personal knowledge of the facts stated herein has been derived from my employment with CitySwitch Tower, LLC.

I affirm that CitySwitch Tower, LLC:

- Agrees to comply with all federal and state statutes, rules, and regulations, Commission requirements as a Telephone Corporation, and state contractual rules and regulations, if granted the request as stated in this application;
- Certifies that all responses to the attached Application for CPCN are true and correct; and

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this Application are true and correct.



Signature

Name: David Mueller

Title: Secretary & Treasurer

APPENDIX A
CORPORATE FORMATION DOCUMENTATION

Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "CITYSWITCH TOWER,
LLC", FILED IN THIS OFFICE ON THE TWENTIETH DAY OF FEBRUARY,
A.D. 2018, AT 7:54 O`CLOCK P.M.*


Jeffrey W. Bullock, Secretary of State

6763160 8100
SR# 20181168906

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 202184603
Date: 02-21-18

PUBLIC VERSION

State of Delaware
Secretary of State
Division of Corporations
Delivered 07:54 PM 02/20/2018
FILED 07:54 PM 02/20/2018
SR 20181168906 - File Number 6763160

STATE *of* DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE *of* FORMATION
of
CITYSWITCH TOWER, LLC

FIRST: The name of the limited liability company is CitySwitch Tower, LLC (hereinafter the “*Company*”).

SECOND: The address of the Company’s registered office in the State of Delaware is 1209 Orange Street, Wilmington, County of New Castle, Delaware 19801. The name of its registered agent at such address is The Corporation Trust Company.

In Witness Whereof, the undersigned has executed this Certificate of Formation this 20th day of February, 2018.

By: /s/ John S. Jongbloed
John S. Jongbloed
Authorized Person



Secretary of State

Certificate of Status

I, SHIRLEY N. WEBER, PH.D., California Secretary of State, hereby certify:

Entity Name: CitySwitch Tower, LLC
Entity No.: 202359513802
Registration Date: 10/25/2023
Entity Type: Limited Liability Company - Out of State
Formed In: DELAWARE
Status: Active

The above referenced entity is active on the Secretary of State's records and is qualified to transact intrastate business in California.

This certificate relates to the status of the entity on the Secretary of State's records as of the date of this certificate and does not reflect documents that are pending review or other events that may impact status.

No information is available from this office regarding the financial condition, status of licenses, if any, business activities or practices of the entity.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of October 29, 2025.

SHIRLEY N. WEBER, PH.D.
Secretary of State

Certificate No.: 383281431

To verify the issuance of this Certificate, use the Certificate No. above with the Secretary of State Certification Verification Search available at bizfileOnline.sos.ca.gov.

PUBLIC VERSION

APPENDIX B
EVIDENTIARY HEARING REQUEST

Appendix B is not applicable; Applicant does not request a hearing.

APPENDIX C
GEOGRAPHIC LOCATIONS/MAPS

Appendix C is not applicable; Applicant proposes to serve all URF LEC territories (as a CLC provider) and the entire state (as an interexchange provider).

APPENDIX D
CALIFORNIA OPERATIONS

Appendix D is not applicable; Applicant is not already operating in the state.

APPENDIX E

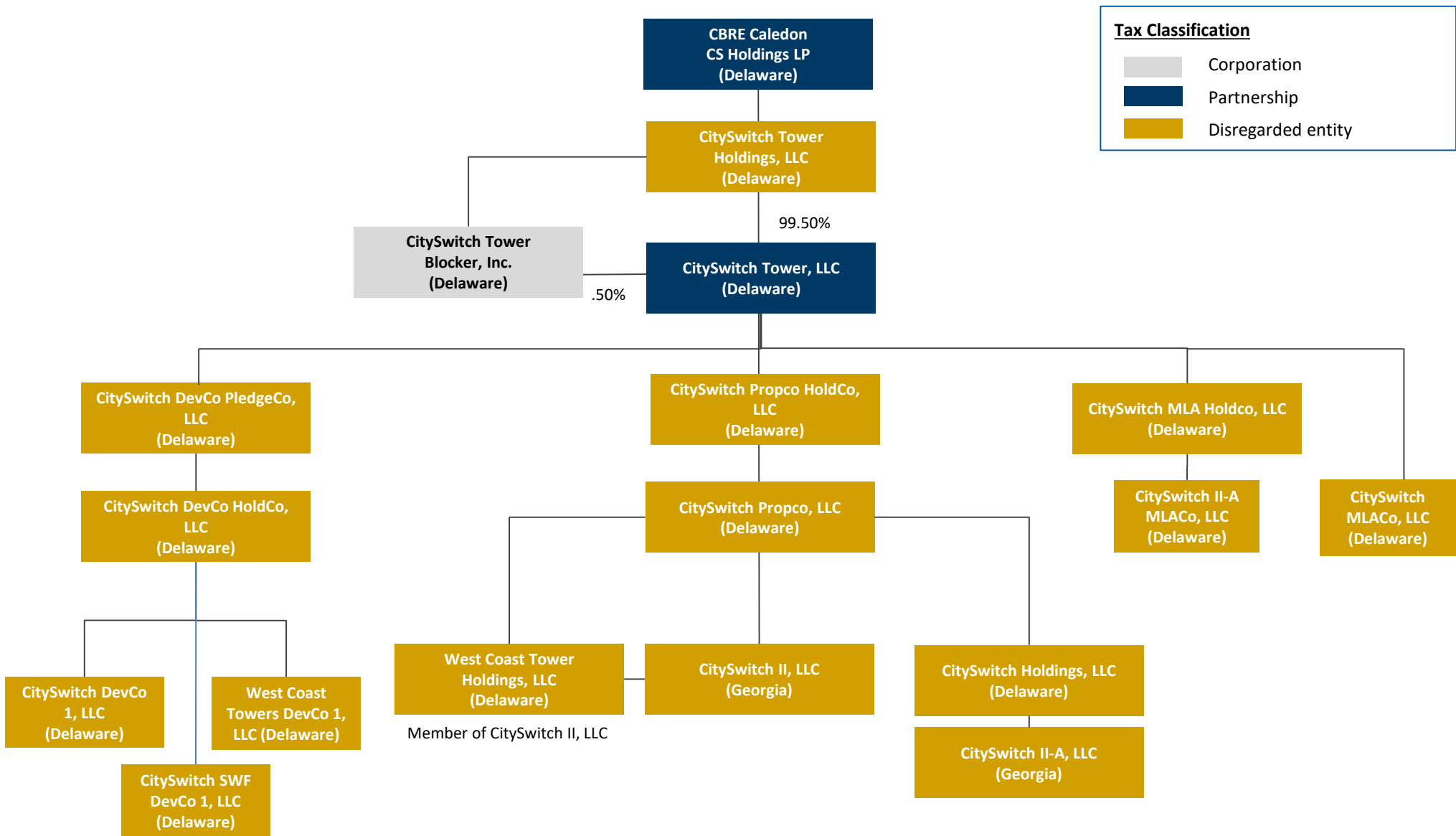
SWORN AFFIDAVIT EXCEPTIONS

Appendix E is not applicable; Applicant answered TRUE to Question 9.

APPENDIX F
AFFILIATED ENTITIES

In lieu of providing a list of affiliated entities, Applicant provides an organization chart which shows its affiliated and parent companies.

Organizational Structure



APPENDIX G
MANAGERIAL AND TECHNICAL EXPERTISE

There are two officers of CitySwitch Tower, LLC:

1. Robert Raville, President & CEO; and
2. David Mueller Secretary & Treasurer.

Messrs. Raville and Mueller's business address is:

CitySwitch
3715 Northside Parkway, Suite 1-200
Atlanta, GA 30327

Robert G. Raville

Atlanta, GA 30327

Email: Robert.Raville@CitySwitch.com

SUMMARY

- Seasoned telecommunications real estate professional with experience running and managing wireless infrastructure companies and organizations. Execution oriented executive with proven track record and leadership in growing and managing fast paced, entrepreneurial ventures. Proven ability to drive business and marketing strategy, build high-performing, metrics-focused teams, and formulate customer service strategies that drive profitable growth and strategic change. Seasoned influence and leadership skills along with demonstrated success in identifying talent and building individual and management capability.

WORK EXPERIENCE

2016-Present **CitySwitch** *(dba)*

CBRE Caledon CS Holdings, LP.
President & CEO

Atlanta, GA

- Manage the profit & loss, job cost, cash flow and increase asset yield for the company; responsible for all areas of finance, strategic planning, corporate development, operations, human resources and sales and marketing.
- Member of the company's board of directors; Chairman of the firm's Investment Committee
- Led the Company's \$125M inaugural 4a2 Investment Grade Private Placement and a new \$60M revolving development facility to allow for construction financing support.
- Led multiple strategic equity recapitalizations of the company with various institutional real asset, infrastructure fund managers and private equity sponsors – American Infrastructure Funds | AIMPORA Capital Partners – 2018, \$80M Series A and Series B equity placement; CBRE Investment Management – 2021, \$300M equity commitment through the firm's CGIF Global Infrastructure Fund.
- Senior lead along with firm's CFO on the sourcing, structuring and operations of an \$88M senior revolving credit facility with a consortium of regional banks.
- Led the formation of several joint ventures - Tower Ventures Holdings, LLC and the executive management of the Company, comprising a capital raise of both debt and equity in excess of \$24M and Pyramid Network Services, LLC comprising of strategic capital allocation strategies around government and emergency wireless infrastructure M&A and development.
- Led the negotiation and implementation of various master development relationships and agreements with CSX Transportation, Inc., CBRE Group, Norfolk Southern Corp., Union Pacific Railroad Co., and Watco Companies for new macro tower and small cell development.
- Successfully managed a team responsible for the development of over 500 new build towers and operating a current pipeline of another 700 at present.
- Manage direct reports and a host of vendor relationships in site development, overseeing all aspects of pricing, scheduling, and implementation on new build wireless infrastructure projects.
- Direct oversight of the company's sales and marketing efforts and managing a leasing and development run-rate pipeline of \$10M in revenue with Verizon Wireless, T-Mobile USA, AT&T Mobility and Dish Network; lead the customer service and national relationships with all major carriers.
- Lead the AT&T deal Project Flood initiative – financing, organization and operations.
- Managing Member of the Independent Developer's Forum with the Wireless Infrastructure Association.

2013 – 2015 **American Tower Corporation**

Vice President, Property Strategy & Development

Atlanta, GA

- American Tower (NYSE: AMT) is a leading independent owner, operator and developer of wireless and broadcast communications real estate. American Tower currently owns and operates approximately 87,000 communications sites in the United States, Latin American, Africa, India and Europe and has a market capitalization of approximately \$90B.
- Senior executive responsible for wireless infrastructure development, M&A, and leasing across the company's strategic property and 'land rights' portfolio. Nationwide portfolio includes 50,000 miles of railroad right of way across 5 'Class 1s' and various short line operators, United States Postal Service national property portfolio (9,000 locations), Plum Creek Timber Co. (PCT) (~7M acres) and other various strategic portfolios.

- Responsibility for the Global Tower Partners merger integration associated with the railroad managed tower and operating portfolios totaling over \$4M in annual revenue across 450 towers. Successfully managed various departments (Sales, Legal, FP&A, Operations, Net Dev/PMO) in the timely transition of agreements and assets across multiple internal systems.
 - Member of the US Tower Leadership and the Sales & Marketing Leadership teams.
 - Direct management responsibility for a business development manager with dotted line management responsibility for 2 operations managers (PMO and Leasing Ops), working collaboratively across various internal teams to develop, implement and execute a five-year strategic sales and development plan in excess of \$3M in annual revenue consisting of 250+ towers and deploying an estimated \$65M in CAPEX over said period.
 - Develop and drive pipeline growth for sales and development leasing, originating over 180 new build tower opportunities and managing an active pipeline of 70 towers with fully valued annualized revenues of \$4M and anchor tenant annual revenues of \$1.9M exceeding internal rate of return and asset yield goals by an average of 10%
 - Communicate land rights sales and development best practices to sales and marketing team, working with Area sales teams to target existing and new wireless carrier customers to drive new business. Bi-weekly calls with all 5 Areas.
 - Define and prioritize carrier business opportunities with 'National Accounts' team and meet regularly with carrier customer national teams to develop large-scale bulk siting proposals; successfully launched development and build to suit programs with AT&T, VZW Sprint and T-Mobile.
 - Responsible for all land rights marketing campaigns in collaboration with marketing team. Successfully launched 4 separate land rights campaigns and e-promos in order to share insights with Area teams and customers, delivering greater impact at scale.
 - Oversee master operating relationship with all land rights partnerships in American Tower's portfolio, ensuring regular communication with partners to add new leases to the portfolio and identify new services that can be offered. Quarterly meetings held with each partner and monthly reporting reviewed.
 - Develop and administer annual budgets, rent rolls and other property reports for the purposes of presenting regular updates to sales and marketing head, Area teams and to land rights internal leads.
- Assess challenges within certain land rights partnerships; design, develop and implement processes, systems and strategies aimed at resolving those challenges. Present strategic solutions in concert with agreements and land rights relationships with responsibility for all renewals, extensions and commercial terms associated with 12 national development contracts; combined a gross in year revenue responsibility in excess of \$16M.

Representative deals include:

- Negotiated and structured TAPP DEAL with NS - \$3.6M, NS DMA and TAMA renewal responsibility – total relationship revenue impact of \$4.7M gross and \$2.M net to ATC.
- Negotiated and structured CSX MLA renewal and extension (secure a minimum of ~\$2M year 1 revenue, extending term by 20 years) New Tower development and marketing/leasing rights on over 200 towers & 20K mi. of ROW
- Negotiated and structured CP – RFP for tower development and managed tower leasing. 1 of 3 finalists (SBA and Parallel Infra.) Blackstone running the process - 10 year exclusive Co-invest model along with incremental master leasing on 200 CP owned towers. Total enterprise valuation in excess of \$55M.
- Negotiated and structured USPS renewal and extension – new term sheet with increased revenues to ATC across rooftops and newly developed towers, drastic process excellence improvements and an overall relationship impact \$3.3M.
- Additional pending master development and marketing deals underway with Kansas City Southern, New Jersey Transit, WATCO Companies, Prologis, and Utah transit Authority.

2010 – 2013

Global Tower Partners, LLC

Vice President, Railroad Development

Atlanta, GA/Boca Raton, FL

- Senior executive responsible for wireless infrastructure development, M&A, and leasing across the railroad portfolio for the fourth largest tower company and the largest private tower and wireless infrastructure company in the US comprised primarily of a consortium of Macquarie managed funds; assets include over 15,000 wireless sites in the US, Costa Rica and Mexico.
- Member of Senior Leadership Team; member of the Development Investment Committee approving 300 new site builds and over \$80M in investment.
- Led the M&A efforts for the CitySwitch, LLC transaction and directed the integration for the company; acquiring all owned and managed towers, tower development and management agreements with Norfolk Southern from CitySwitch. Structured multiple contract amendments and assignments with Norfolk Southern's legal team. Total deal valuation of \$23M.
- P&L accountability to develop over 30 towers annually while maintaining a pipeline for leasing of 3 times annual towers built. Targeted an average annual budget of gross revenue in excess of \$1.3M and net tower cash flows averaging over \$900K, exceeding internal rate of return and asset yield goals by an average of 16%.
- Led all railroad tower and wireless asset acquisition activity for the company, working in conjunction with the company's M&A department. Closed over \$2M in tower M&A related to various railroad tower assets apart from the Norfolk Southern.

- Directed company's railroad origination and development business, with focus on acquiring rights to other railroad portfolios as well as ensuring targets for new sites leased and built on the portfolio are met.
- Negotiated and structured complex 10-year master railroad telecommunications access, development and marketing agreements with 5 'Class 1s' and numerous other short lines totaling the largest aggregation of railroad rights of way for new tower development and tower leasing in the U.S; 50K miles.
- Led the railroad development team inclusive of development directors, project managers, and directed efforts with regional leasing managers to ensure the portfolio's leasing targets were met, inclusive of joint meetings with customers and supporting implementation of sites as required.
- Developed right of way 'small cell' business strategy and directed participation in small cell development efforts, positioning the railroad portfolio into small cell discussions with carrier customers. Negotiated contracts with AT&T and Verizon.
- Appeared and consulted regularly with the FCC as a 'subject matter expert' on railroad tower development and collocation policies and practices.

2006–2010 **CitySwitch, LLC**, an affiliate of Norfolk Southern Corporation
President (2008– 2010)
Senior Vice President, Development & Operations (2006 – 2008)

Atlanta, GA

- Managed the profit & loss, job cost, cash flow and increase asset yield for the company with an enterprise valuation of over \$110M inclusive of the company's equity interest in Thoroughbred Technology and Telecommunications, LLC ("T-Cubed"), a jointly owned venture with Norfolk Southern Corporation comprising over 1,700 route miles of fiber optic conduit.
- P&L accountability for the organization including annual revenue generation and tower sales, producing annual average net income of over \$3M, and a \$5M annual EBITDA.
- Managed the company's annual M&A activity, including negotiation, structuring, valuation and overall transaction of the sale of certain company assets. Conducted the full negotiation and sale of over \$47M in assets, including the transition to Global Tower, LLC and other smaller transactions with SBAC Corp.
- Directly oversaw the company's investment banking relationship including structuring a senior secured debt facility as an annual revolver of \$5M in debt financing with First Citizen's Bank and served as lead interface for all the company's corporate finance activities including the original capital structure involving a \$3M convertible subordinated debenture with Norfolk Southern.
- Managed development of a portfolio of towers, leased to Norfolk Southern and commercial wireless carriers, as well as 1 neutral host distributed antenna system as a business unit in conjunction with T-Cubed. Portfolio averaged 2.8 tenants per tower at exit.
- Oversaw the management of Norfolk Southern's microwave tower portfolio (460 total towers) consisting of over 110 leases and gross annual revenues of \$2M.
- Managed a team of employees comprising of sales and marketing, site development, lease administration, general contractors, finance, construction and real estate including performance reviews, hiring and terminations.
- Managed the company's partnership with Norfolk Southern's executive team and departmental vice presidents and directors including Strategic Planning, Real Estate, Communications, Engineering and managed the strategic relationship with T-Cubed.
- Led all master relationships with third party contractors and customers, structuring various service level agreements with site acquisition, development, environmental and construction management firms.
- Managed the corporate development for all business with other railroads. Successfully negotiated marketing and development lease agreements, tower build to suit contracts and joint ventures with railroads including: CSX, Conrail, Rail America, FECI/Flagler, MDOT, East Penn, Athens Short Line, and Omnitrix.
- Led negotiations of all master lease agreements with customers/wireless telephony carriers. Completed carrier BTS contracts with: AT&T, T-Mobile, Sprint, Nextel, Clearwire, US Cellular, Alltel, Cricket and Metro PCS.
- Oversaw working relationships with national and market level wireless customers, as well as decision makers in order to maximize new tower lease terms and site-specific revenue.
- Reported quarterly to the company board of directors on financials and responsible for the company's MD&A materials for quarterly board of director's meetings including collaboration with controller in preparation of quarterly financial data.
- Led monthly executive staff meetings for the review of new development reporting and general company reporting.

2004 – 2006 **Unison Site Management, LLC**
Senior Site Development Officer and Senior Director, Acquisitions

New York, NY/Atlanta, GA

- Senior officer for a company formed and funded in partnership with Soros Private Equity Group and subsequently Towerbrook Capital Partners, L.P and UBS.
- Beginning in New York and subsequently in Atlanta, authored and implemented Southeastern office business plan, as well as managed and directed the Southeastern office for the company headquartered in Atlanta, GA performing wireless lease M&A related activities in a 5-state region.

- Hired and reviewed 3 direct reports and reported to the Managing Director of Origination with in line reporting to the CEO. P&L accountability for the Southeast region consisting of an annual acquisition and operating budget in excess of \$20M.
- Originated and managed a team involved with the acquisition of a significant portion of a wireless carrier site and tower leases and easements subsequently involved in a \$200M securitization with Goldman Sachs Global Infrastructure Fund.
- Produced in the top 1% of the firm, originating and closing over \$15M in acquisitions transactions with an average deal size of \$500K consisting of wireless leases and towers.
- Trained and managed an origination and administration team comprising of 10 associates, managing personnel in PA, GA, and the NY call center.
- Conducted primary due diligence, return analysis, term sheet negotiation, and participated in underwriting for acquisition of wireless communications towers and base stations.
- Coordinated directly with the Chief Marketing Officer on initial marketing efforts to originate new business through strategic initiatives and market launches in PA as well as the Southeastern US including GA, NC, SC, TN and AL.

2003 – 2004 **OnSite E-Discovery and E-Forensics, TM**
Senior Account Manager

New York, NY

- Non-industry related sales management experience

2002- 2003 **Special Counsel, Inc.**
Director, Business Development

New York, NY

- Non-industry related sales management, operations and recruiting experience

EDUCATION

1998 - 2002 **University of Virginia**

Charlottesville, VA

- B.A., History
- Eli Banana Ribbon Society and Fund, est. 1878
- Philanthropy: Led fundraising committee annually for Muscular Dystrophy Association. Chaired the organizing committee for an annual memorial lacrosse tournament with proceeds being donated to the American Heart Foundation.
- Kappa Alpha Order

Summer 2001 **Universität Innsbruck**

Innsbruck, Austria

- Summer program with focus on world and European history instructed by Stephen Ambrose

LANGUAGES

- French – Bilingual Proficiency
- Spanish – Working Proficiency

Proven financial professional with over 20 years of progressive experience across multiple industries and company sizes. Strong FP&A background as well as cost/project controlling in large global organizations and locations leading to running the finance function and managing a successful change of control transaction for a Private Equity owned company..

AREAS OF EXPERTISE

- Financial Planning & Analysis (FP&A)
- Cost Control and Accounting
- Treasury – Cash Management and Capital Markets
- Financial Modeling
- Executive Presentation
- Talent Management

WORK EXPERIENCE

CitySwitch Tower, LLC

SVP, Chief Financial Officer & Treasurer

Atlanta, GA

2018-Present

- Chief Financial Officer for CitySwitch, A Private Equity backed telecommunications company providing Cell Tower leasing services to all major US carriers. Key member of the Company's senior leadership team responsible for financial performance, IT as well as developing long term strategy.
- Successfully led effort re-capitalize in September of 2021. This resulted in 86% IRR and 2.7x MOIC returns post management incentive distributions to our original investors.
- Communicate financial results to board of directors and other stakeholders and provide effective access to information for business leaders. Lead annual and strategic planning process.
- Responsible for managing short and long-term liquidity strategy through a mix of debt and equity.
- Built from scratch all financial processes and procedures. Hired and developed an accounting and FP&A organization.
- Responsible for all cash management activities including establishing initial credit facility and subsequent re-financings as well as a first of its kind private placement in 2024.
- Developed the business case and now leading new business line opportunity to buy out ground leases at our existing and future cell sites including adding debt capacity to help fund.
- Successfully led team in multiple acquisitions

Novelis Corp.

Director, FP&A & Strategy, Novelis North America

Atlanta, GA

2015-2018

- Oversee the coordination of the Value Based Management (VBM) & strategic planning process for the region.
- Led team responsible for business case analysis and justification for first Greenfield investment in North America in last 40 years.
- Coordination with regional and plant teams to develop and execute STEP plans.
- Work with commercial teams to maximize our portfolio on current manufacturing assets. Support commercial VP's in customer negotiations and strategy.
- Manage industry trade association and government interaction.
- Lead competitive analysis and provide updates on our key competitors, leverage information from investment banking, industry consultants, and other sources to continuously assess the emerging opportunities and threats in our markets.
- Process owner for Financial Planning & Analysis for Novelis North America, a \$3B per year region for Novelis.
- Work directly for the regional CFO, overseeing a team of 9 employees throughout the North America region.
- Partner with the North America leadership team to own the development of a detailed annual plan, long term (5 year) business plan, monthly performance analysis and business forecasts, capital project and investment analysis and management, metal and inventory control initiatives as well as cash flow and working capital initiatives with strong influence on all cash flow and treasury decisions.
- Helped negotiate and drive \$40M of cash flow initiatives as well as \$30M in working capital financing initiatives to meet year end goals and allow the business to return equity to our shareholder.
- Implemented Zero Based Budgeting in the regional headquarters to drive 7% savings in Selling and General Administration (SG&A) expenses.

Novelis Inc.*Director, Finance, Global Supply Chain*Atlanta, GA
2013-2015

- Key team member on implementation of a corporate restructuring project that brought \$15M of year over year sustainable savings to the corporate functions.
- Global process owner and key business partner for the Global Supply Chain (including Global Procurement, Global Recycling, Global Supply Chain and Novelis ERP Project) and capital functions. Provide financial insight and support to the SVP & Chief Supply Chain Officer by consolidating performance across all areas and creation and presentation of analysis for the senior management team and ensuring the right information is being shared with the right people to make well-reasoned business decisions. Manage direct team of 4 managers to set organizational direction for the following:
- Procurement Finance: Direct planning and analysis process within procurement ensuring that appropriate strategic and annual plans are established, actual performance is monitored within established guidelines and results reported within and outside of procurement.
- Recycling Finance: Direct planning and analysis process, ensuring that timely, accurate and actionable information is reported to key stakeholders in support of achieving recycling and sustainability goals set by the business. Including partnering on capital projects, financial modeling, and global contract negotiations.
- Supply Chain Finance: Developed supply chain finance as a function, by managing the creation of actionable financial analysis in support of product profitability, make vs. buy analysis, inventory forecasting, and other ad-hoc financial needs.

Novelis Inc.*Sr. Manager, Finance—Global Recycling & Procurement*Atlanta, GA
2011-2013

- Work directly for Chief Supply Chain Officer to develop and monitor financial performance across the recycling business line, as well as procurement (both direct & indirect) and supply chain functions. Member of both supply chain and procurement councils charged with career development and strategy for the global organizations.
- Created and implemented P&L reporting framework for recycling business line. Worked actively with regional and corporate management to provide analysis of results to executive management. Teamed with risk management to develop hedging policy and recommendations for mitigating exposure to fluctuations in aluminum prices.
- Lead Strategic and Annual Plan process. Develop targets and consolidate regional and global plans for input costs, taking into consideration market price movement and strategic initiatives.
- Created process to accurately monitor commodity price movement for global metals, energy, logistics and coatings. Alongside created forecasting tool to convey to regional and corporate management updated outlooks on inflation and spend.
- Led standardization of reporting and KPI's across regions and corporate in support of SAP implementation. Use Hyperion and Business Objects along with SAP to create standard reports.

Bechtel Group Inc.*Various Finance and Project Controlling Positions*Various Locations
2003-2011

- Sr. Manager Financial Planning & Analysis – Lead cost manager for AT&T national build out.
- Manager, Planning & Analysis – Manager for Northeast market office for all AT&T 3G modifications and new build deployments.
- Supported all project controls activities for Southeast Region build-out and upgrades to AT&T's wireless network. As member of Region Team responsible for coordinating with 6 Southeast markets.
- Led assignment for an internal comparison between pricing between two different supplements of the Master Contract Agreement with Cingular. Saved Bechtel over \$2M dollars from original study.
- Led effort and tracked all costs for claim after Hurricanes Katrina hit the gulf coast. Coordinated with contractors from across the country to mobilize to Southeast and restore cell service to areas hit by Hurricane Katrina.
- Worked closely with multiple project managers of the infrastructure development department at the Nevada Test Site to create estimates, schedules, and budgets for Department of Energy infrastructure initiatives.

EDUCATION**Michigan State University**
*Bachelor of Science*E. Lansing, MI
2002

APPENDIX H
APPLICANT ATTESTATION EXCEPTIONS

Appendix H is not applicable; applicant answered “TRUE” to Question 10.a.

APPENDIX I
CONSTRUCTION OF FACILITIES

APPENDIX I

Question 11.A. Description of Proposed Construction

Overview of Services and Customers: CitySwitch seeks authority to provide full facilities-based and resold competitive local exchange access services and nondominant interexchange services (“Services”) to carrier and enterprise customers throughout the State of California.

Applicants’ Services will be both intrastate and interstate and will rely on a fiber-based transport and small cell infrastructure platform designed to support current and future generations of wireless technologies, including 4G and 5G. The platform consists of the following elements:

- (i) *Small Cell and Node Infrastructure:* Strategically located lower-height antennas and radio units mounted on existing infrastructure (e.g., utility poles, streetlights, or purpose-built poles) that provide localized wireless coverage and capacity enhancements for 4G and 5G networks.
- (ii) *Access and Connecting Facilities:* Equipment and interfaces enabling carriers and enterprise customers to interconnect with the CitySwitch network for backhaul, fronthaul, and other transport services supporting macro, micro, and pico wireless deployments.

CitySwitch’s Services are customized to meet the transport and backhaul needs of wireless carrier customers and may also include services related to fiber-based backhaul for macro and small cell sites, as well as enterprise data networking services for Internet Service Providers (“ISPs”) and other large customers utilizing the same infrastructure.

Construction Description: CitySwitch may acquire or obtain access to existing facilities from other carriers and utilities or construct its own facilities, as necessary. CitySwitch understands this construction activity may involve ground-disturbing activities. As a result, CitySwitch seeks “full” facilities-based authority for these activities. As is explained in detail in

Appendix J, CitySwitch believes that its construction activities will generally be eligible for one or more categorical exemptions given the nature of the construction and the fact that construction work will ordinarily take place in existing roadways or other previously-developed and disturbed rights-of-way or utility easements. Thus, CitySwitch proposes that the requested grant of full facilities-based construction authority be subject to the *Energy Division's 21-Day Environmental Review Process* that has been followed for similar carriers and recently codified in D.24-11-033.¹

Question 11.b Lists of Competing Entities

CitySwitch's competitors are other CLCs and NDIECs that own and operate "telephone lines," as defined in California Public Utilities Code § 233. Pursuant to Commission Decision 97-06-107, telecommunications service providers are no longer required to comply with former Commission Rule 18(b), and General Order 96-A, subsections (G)(1) and (2). Thus, applications such as this are exempt from Rule 3.1(b)'s requirement to provide a list of competing entities.

Question 11.c. Map Showing Proposed Construction

CitySwitch seeks authority to provide its services in those exchanges where the Commission has authorized local competition. In addition, CitySwitch seeks non-dominant interexchange authority on a statewide basis. The CPCN Application Form Instructions confirm that there is no requirement to submit a map unless an applicant seeks authority to construct in "specific portions of the state only."² CitySwitch anticipates providing project specific maps in connection with the *Energy Division's 21-Day Environmental Review Process*.

Question 11.d. Statement of Required Franchises, Health, and Safety Permits

CitySwitch is not aware of any health and safety permits required for the provision of the Services described herein. As a Commission-certificated public utility, CitySwitch will require

¹ D.24-11-003 at 128 (Ordering Paragraph 15).

² CPCN Application Form, Question 6.

no municipal franchises.³ CitySwitch will abide by all applicable local permitting requirements in carrying out the activities authorized by the Commission.

Question 11.e. Facts Showing Public Convenience and Necessity

A decision by the Commission to grant CitySwitch authority to provide full facilities-based local exchange and interexchange services will benefit the public interest by augmenting availability of leading-edge telecommunications technology within California. CitySwitch's infrastructure will expand competitive telecommunications facilities in California, increasing wireless coverage and network capacity while enabling the simultaneous deployment of both 4G and 5G services. By supporting carrier networks and municipal smart devices (such as cameras, environmental sensors, and other connected infrastructure), the CitySwitch platform will encourage the accelerated deployment of next-generation services throughout the state.

Thus, the Commission's grant of this Application will result in investment in new infrastructure within the State of California, leading to economic development and will enhance competition on the communications market. Competition in the provision of communications services provides Californians with more choices, lowers prices, speeds the deployment of new communication and broadband technologies, creates jobs, and benefits the economy. The Commission has previously determined that the public convenience and necessity require that competition be allowed in the provision of competitive local exchange service.⁴ Further, 47 U.S.C. § 253(a) establishes a national policy favoring competition in the provision of telecommunications services and forbids any regulation or other legal requirement that prohibits or has the effect of prohibiting any entity from providing a telecommunications service.

Question 11.f Statement Showing Cost of Cost of Construction

³ See Cal. Pub. Util. Code § 7901.

⁴ See Rulemaking 95-04-043/Investigation 95-04-044.

CitySwitch is not requesting approval of any specific construction project by this Application and is therefore unable to provide construction cost information at this time. Future construction project costs will vary depending on size and complexity of the project. Any construction activities undertaken by CitySwitch will be funded through financing procured through private sources, operations, or other sources that may become available.

Question 11.g Statement Showing Financial Ability to Render Service

CitySwitch is financially qualified to offer and render the proposed services in California for which authority is sought. CitySwitch has access to the financing and working capital necessary to fulfill any obligations it may undertake with respect to operation and maintenance of all requested services. As evidence of its ability to meet the Commission's required financial showings, including "\$100,000 USD of cash or cash equivalent reasonably liquid and readily available to meet the firm's start-up expenses." Applicant submits under seal as Confidential Appendix K: (i) a copy of its October, 2025 bank statement.⁵

CitySwitch does not currently owe and does not anticipate owing deposits to local exchange or interexchange carriers.⁶ However, as directed by CPCN Application Form Question 13, Appendix K demonstrates that CitySwitch will have access more than sufficient financial support to cover any unanticipated start-up costs, including \$25,000 for any interconnection deposits. CitySwitch affirms that sufficient financial resources are unencumbered and will remain available to fund its working capital requirements until sufficient revenue is generated.

⁵ Pursuant to D. 24-11-003, financial documents are subject to presumptive confidential treatment. As a result, they are being separately filed per the *Special Instructions for Filing Confidential Information for 1001 CPCN Applications Appendix I (Questions 11.f Statement Showing Cost of Construction & 11.j Estimated Number of Customers in the First and Fifth Years of Operation)*, and Appendix K (*Financial Information*), available at [Information for Telecommunications Applicants and Registrants in California](#).

⁶ See D.95-07-054, Rule 4(B)(1).

Thus, CitySwitch meets the financial qualifications shown in the Initial Rules for Competitive Local Exchange Carriers issued in D.95-07-054, D.96-02-072, D.24-11-003 (Appendix F) and Rules 3.1(g) and 2.3 of the Rules of Practice and Procedure (“Rules”).

Question 11.h. Proposed Rates

CitySwitch does not intend to offer basic service or switched access and therefore seeks an exemption from filing a tariff pursuant to GO 96-B, Telecommunications Industry Rule 5.⁷ Consistent with D.07-09-018, the Commission has granted exemptions from tariff filing requirements to CPCN applicants that did not offer residential basic service.⁸ CitySwitch will offer its service on a non-discriminatory basis and at competitive rates but will do so through individually-negotiated contracts. Should CitySwitch later offer basic service or switched access, it will first comply with all tariffing obligations.

Question 11.i. General Order 104-A Statement

Pursuant to Section 2 of G.O. 104-A, no matters that must be reported have occurred or are expected.

⁷ G.O. 96-B, Telecommunications Industry Rule 5, provides that the Commission may “grant[] exceptions from the general requirement . . . that a Utility serve its California customers under its filed tariffs.” In D.07-09-018, the Commission established detariffing rules for carriers such as CLCs, which it reaffirmed in D.24-11-003.

⁸ See, e.g., D.11-12-014, D.12-08-036, and D.13-01-010. The Commission also recently affirmed the availability of permissive de-tariffing in D.24-11-003. D.24-11-003 at 78-81.

Question 11.j. Estimated Customer Base

CitySwitch estimates that it will serve [BEGIN CONFIDENTIAL] **[END**
CONFIDENTIAL] customers during the first year and [BEGIN CONFIDENTIAL] **[END**
CONFIDENTIAL] customers during the fifth year of operations under its requested authority.⁹

⁹ Pursuant to D. 24-11-003, the customer estimates are subject to presumptive confidential treatment. As a result, they are being separately filed under seal per the *Special Instructions for Filing Confidential Information for 1001 CPCN Applications Appendix I (Questions 11.f Statement Showing Cost of Construction & 11.j Estimated Number of Customers in the First and Fifth Years of Operation), and Appendix K (Financial Information)*, available at [Information for Telecommunications Applicants and Registrants in California](#). See also Statement of Confidentiality, filed herewith.

STATEMENT OF CONFIDENTIALITY
Certificate of Public Convenience and Necessity

Name of Applicant/Company: CitySwitch Tower, LLC

My name is David Mueller. I am the Secretary & Treasurer of CitySwitch Tower, LLC. I have personal knowledge of the following documents and information submitted with this statement: (Check all that apply)

 X Financial documents meeting the requirements set forth in D.24-11-003, Appendix F, and consisting of one or more of the following documents: (1) Unaudited bank statements; (2) certificate of deposit or other liquid deposits with a reputable bank or financial institution; (3) preferred stock proceeds or other shareholder equity; (4) letter of credit issued by a reputable bank or other financial institution; (5) loan issued by a qualified subsidiary, affiliate, of applicant, or a qualified corporation holding controlling interest in the applicant; (6) guarantee, issued by a corporation, co-partnership, or other person or association; (7) guarantee, issued by a qualified subsidiary, affiliate, or applicant; and (8) audited financial statements.

 X Estimated number of customers for the first and fifth year of service (Rule 3.1(j)).

 Construction costs for proposed facilities (Rule 3.1(f)).

I affirm and declare under penalty of perjury under the laws of the State of California and Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of my knowledge, all of the documents herein are protected from public disclosure pursuant to Decision 24-11-003.



Signature

Name: David Mueller

Date: 11-21-2025

APPENDIX J
CATEGORICAL EXEMPTIONS

APPENDIX J

CPCN Application Form Question 12, directs applicants that indicate that their construction activity is likely eligible for a categorical exemption from CEQA and request to utilize the *Energy Division's 21-Day Environmental Review Process* to “[a]ttach **Appendix J** with list of categorical exemptions and briefly explain the applicability of each exemption to the proposed construction.” Below, CitySwitch first provides an overview of its proposed construction activity and then lists potentially applicable categorical exemptions and explains their applicability.

Overview: CitySwitch may rely on existing facilities obtained from other carriers and utilities or construct its own facilities as necessary in order to deploy transportation and transmission of communications services. CitySwitch expects that any outside plant construction ordinarily would be relatively minor and occur along existing roadways or other previously developed and disturbed rights-of-way or utility easements. CitySwitch anticipates that any such projects would fall within one or more categorical exemptions under CEQA and that it thus should be eligible for the *Energy Division's 21-Day Environmental Review Process*.

Applicable CEQA Exemptions: There are several CEQA exemptions that may apply to CitySwitch's construction activities, including the following.

Class 1 Exemption: Minor Alterations

Class 1 covers operation, repair, maintenance, leasing or minor alteration of existing public or private structures and facilities, with negligible or no expansion of an existing use.¹

Applicability: This exemption would apply when CitySwitch uses existing structures and facilities to deploy its network and/or when it makes minor modifications to those structures to install its facilities. For example this exemption might apply if CitySwitch leased an existing municipal light pole and made minor alterations to it so it could support a small cell facility.

¹ 14 CCR § 15301

Class 2 Exemption: Replacement or Reconstruction

Class 2 consists of replacement or reconstruction of existing structures and facilities including “(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.”²

Applicability: The exemption would apply to instances where CitySwitch replaces or reconstructs an existing facility to accommodate the installation of facilities. For example, this would cover construction of a replacement utility pole or reconstruction of an existing municipal light pole as needed to support small cell facilities.

Class 3 Exemption: New Construction

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. Examples include (d) water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction and (e) construction of accessory (appurtenant) structures.³

Applicability: This exemption would apply generally to CitySwitch’s construction which, by its nature, will be a extending utility (*e.g.*, advanced wireless services) throughout its footprint. This exemption would also cover the construction of new support poles and any other accessory structures needed to house equipment.

CLASS 4 Exemption: Minor Alterations

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. An example of a class 4 exemption is (f) minor trenching and backfilling where the surface is restored.

Applicability: This exemption would apply to any underground construction activity that CitySwitch might undertake (*e.g.*, installing fiber and conduits, handholds, etc) that involved minor trenching and surface restoration.

Class 32 Exemption: Infill Development Projects

² 14 CCR § 15302

³ 14 CCR § 15303.

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.⁴

Applicability: This exemption code would apply to construction within existing city limits and could cover construction of new support poles where needed and any associated overhead or undergrounding work.

⁴ 14 CCR § 15332.

APPENDIX K
CONFIDENTIAL BANK STATEMENT¹

¹ Pursuant to D. 24-11-003, financial information is subject to presumptive confidential treatment. As a result, Applicant's bank statement is being separately filed under seal per the *Special Instructions for Filing Confidential Information for 1001 CPCN Applications Appendix I (Questions 11.f Statement Showing Cost of Construction & 11.j Estimated Number of Customers in the First and Fifth Years of Operation)*, and *Appendix K (Financial Information)*, available at [Information for Telecommunications Applicants and Registrants in California](#). See also Confidentiality Statement filed herewith.

REDACTED BANK STATEMENT

Protected from public disclosure pursuant to California
Public Utilities Commission Decision 24-11-003

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Signature

Name: David Mueller

Date: 11-21-2025

APPENDIX L
INITIAL TARIFF

Appendix L is not applicable; Applicant is requesting de-tariffed status.