PUBLIC NOTICE

Federal Communications Commission
45 L Street NE
Washington, DC 20554

News Media Information 202-418-0500
Internet: www.fcc.gov

DA 26-723
Released: July 13, 2026

DOMESTIC SECTION 214 APPLICATION FILED FOR THE TRANSFER OF CONTROL OF CBTS TECHNOLOGY SOLUTIONS LLC TO TOWERBROOK CAPITAL PARTNERS GP LIMITED

NON-STREAMLINED PLEADING CYCLE ESTABLISHED

WC Docket No. 26-104

Comments Due: July 27, 2026
Reply Comments Due: August 3, 2026

By this Public Notice, the Wireline Competition Bureau seeks comment from interested parties on an application filed by CBTS Borrower LLC (CBTS Borrower), CBTS Technology Solutions LLC (CBTS-TS), and TowerBrook Capital Partners GP Limited (TowerBrook Capital Partners) (collectively, Applicants), pursuant to section 214(a) of the Communications Act of 1934, as amended, and section 63.04 of the Federal Communications Commission's (Commission) rules,[1] requesting Commission consent for the transfer of indirect control of CBTS-TS to TowerBrook Capital Partners.[2]

CBTS-TS, a Delaware limited liability company, offers or provides domestic telecommunications services in Arkansas, Colorado, Illinois, Kentucky, Michigan, Minnesota, New York, Ohio, Texas, and Virginia and other services in all states and the District of Columbia, except Alaska.[3] CBTS-TS is currently indirectly controlled by CBTS Borrower, a Delaware limited liability company.[4] CBTS-TS and CBTS Borrower are indirect subsidiaries of TowerBrook Capital Partners L.P.'s (TowerBrook) Fund VI fund family and are controlled by TowerBrook Investors, Ltd. (TowerBrook Investors), a Cayman Islands entity.[5] Six individuals currently hold ownership interests in TowerBrook Investors, and of those, the individuals with a greater than 10% voting interest are: Neal Moszkowski (34.16%), a U.S. citizen;

[1] *See* 47 U.S.C. § 214(a); 47 CFR § 63.04.

[2] Domestic Section 214 Application Filed for the Transfer of Control of CBTS Technology Solutions LLC to TowerBrook Capital Partners GP Limited, WC Docket No. 26-104 (filed May 1, 2026) (Application). On June 26, 2026, Applicants filed a supplement to the Application. Letter from Marc A. Korman et al., Counsel for CBTS Borrower, LLC and TowerBrook Capital Partners GP Limited, and Danielle Burt et al., Counsel for CBTS Technology Solutions LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 26-104 (filed June 26, 2026) (Supplement). Any action on the Application is without prejudice to Commission action on other related, pending applications.

[3] Application at 2, 6. Applicants state that they do not currently receive universal service high-cost support and that they do not participate in the Lifeline program. *Id*. at 6. Applicants further state that they have no affiliates that provide domestic telecommunications services. Supplement at 1.

[4] Application at 2.

[5] *Id*. at 2, Exh. C (TowerBrook Investors Disclosable Ownership). TowerBrook is a Delaware limited partnership. *Id.* at 2.

Jonathan Bilzin (19.57%), a U.S. citizen; and Karim Saddi (19.57%), a citizen of France.[6]

TowerBrook Capital Partners, a limited general partnership organized under Cayman Islands law, is a newly formed investment management partnership that does not provide telecommunications services.[7] Applicants state that TowerBrook Capital Partners currently has temporary ownership, and that concurrent with the proposed transaction, equity interests in TowerBrook Investors will be transferred to TowerBrook Capital Partners.[8]

Pursuant to the terms of the proposed transaction, Applicants seek to reorganize the ownership of CBTS-TS through the transfer of TowerBrook Investors to TowerBrook Capital Partners.[9] As a result, TowerBrook Capital Partners will own and control CBTS Borrower, and its subsidiary, CBTS-TS.[10] Under the contemplated reorganization, equity interests in TowerBrook Investors will be transferred to TowerBrook Capital Partners.[11] TowerBrook Capital Partners will be held, post-consummation, as follows: Mr. Bilzin and Mr. Saddi will each hold 33% voting interests and will be the only directors; Mr. Moszkowski will hold a 32.9% voting interest, and another individual will hold a 1.1% voting interest.[12]

No Referral to Executive Branch Agencies: The Commission determined in the *Executive Branch Review Process Order* that it would not routinely refer to the Executive Branch "standalone applications to transfer control of domestic section 214 authority."[13] The Commission, however, retains the discretion to refer a domestic-only section 214 transaction should it find that a particular application may raise national security, law enforcement, foreign policy, or trade policy concerns for which it would benefit from the advice of the Executive Branch.[14] Applicants state that the Application involves the transfer of control of a licensee that holds only domestic section 214 authority.[15] Applicants therefore assert that, consistent with the decision in the *Executive Branch Review Process Order*, the Application does not require a referral to the Executive Branch.[16] We do not find any special circumstances that warrant referral of this Application to the Executive Branch agencies. While we are not referring the Application, we will provide a courtesy copy of this public notice to the Executive Branch agencies.[17]

Applicants assert that a grant of the Application would serve the public interest, convenience, and necessity.[18] Because the proposed transaction is more complex than those accepted for streamlined treatment and in order to analyze whether the proposed transaction would serve the public interest, we

---

[6] *Id.* at 3. Applicants state that Mr. Bilzin and Mr. Saddi are also both directors of TowerBrook Investors. *Id*.

[7] *Id.* at 3, 5-6.

[8] *Id*. at 3.

[9] *Id*.

[10] *Id.*

[11] *Id*.

[12] *Id*. Applicants state that upon his retirement, Mr. Moszkowski will be transferring his voting interest in TowerBrook Capital Partners in equal part to Mr. Bilzon and Mr. Saddi. *Id*.

[13] *Process Reform for Executive Branch Review of Certain FCC Applications and Petitions Involving Foreign Ownership*, IB Docket No. 16-155, Report and Order, 35 FCC Rcd 10927, 10936, para. 25 (2020) (*Executive Branch Review Process Order*).

[14] *Id*.

[15] Application at 8.

[16] *Id*.

[17] *See Executive Branch Review Process Order*, 35 FCC Rcd at 10941, para. 36 n.99; *see also id*. at 10939, para 30 n.81.

[18] Application at 4.

accept the Application for non-streamlined treatment.[19]

Domestic Section 214 Application Filed for the Transfer of Control of
CBTS Technology Solutions LLC to TowerBrook Capital Partners GP Limited,
WC Docket No. 26-104 (filed May 1, 2026).

GENERAL INFORMATION

The Application identified herein has been found, upon initial review, to be acceptable for filing. The Commission reserves the right to return any application if, upon further examination, it is determined to be defective and not in conformance with the Commission's rules and policies.

Interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: https://www.fcc.gov/ecfs/.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. **All filings must be addressed to the Secretary, Federal Communications Commission.**
  - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530.

In addition, e-mail one copy of each pleading to each of the following:

1) Dennis Johnson, Competition Policy Division, Wireline Competition Bureau, dennis.johnson@fcc.gov; and
2) Jim Bird, Office of General Counsel, jim.bird@fcc.gov.

The proceeding in this Notice shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules. Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying

[19] 47 CFR § 63.03(c)(1)(v).

the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b), 47 CFR § 1.1206(b). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

To allow the Commission to consider fully all substantive issues regarding the Application in as timely and efficient a manner as possible, petitioners and commenters should raise all issues in their initial filings. New issues may not be raised in responses or replies.[20] A party or interested person seeking to raise a new issue after the pleading cycle has closed must show good cause why it was not possible for it to have raised the issue previously. Submissions after the pleading cycle has closed that seek to raise new issues based on new facts or newly discovered facts should be filed within 15 days after such facts are discovered. Absent such a showing of good cause, any issues not timely raised may be disregarded by the Commission. For further information, please contact Dennis Johnson, Competition Policy Division, Wireline Competition Bureau, at (202) 418-0809.

-FCC-

[20] *See* 47 CFR § 1.45(c).