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December 30, 2009

VIA UPS OVERNIGHT

Marlene H. Dortch, Secretary
Federal Communications Commission
Wireline Competition Bureau Applications
P.O. Box 979091
St. Louis, MO 63197-9000

Re: Application for Consent to Assign Assets from Global Capacity Group, Inc. and Global Capacity Direct, LLC f/k/a Vanco Direct USA, LLC, to Global Telecom & Technology Americas, Inc.

Dear Ms. Dortch:

Global Telecom & Technology Americas, Inc., Global Capacity Group, Inc. and Global Capacity Direct, LLC f/k/a Vanco Direct USA, LLC ("Applicants") hereby file the above-referenced application regarding a transfer of assets. Enclosed please find an original and six (6) copies of the application.

Also enclosed is a completed Fee Remittance Form 159 and a check in the amount of \$1,015.00 to cover the requisite filing fee required for this application.

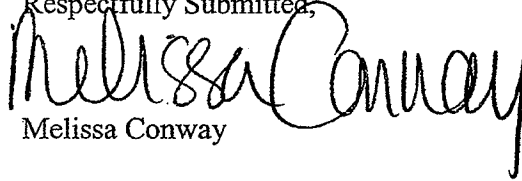
Pursuant to Section 63.04(b) of the Commission's Rules, the Applicants submit this filing as combined international and domestic Section 214 transfer of control applications ("Combined Applications"). The Applicant has filed the Combined Applications with the International Bureau through the IBFS filing system.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
December 30, 2009
Page Two

Please date-stamp the stamp-and-return copy upon receipt and return it in the enclosed pre-paid UPS envelope. Should you have any questions with respect to this filing, please contact Melissa Conway at (202) 342-8552.

Respectfully Submitted,


Melissa Conway

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Global Capacity Group, Inc.)
and)
Global Capacity Direct, LLC f/k/a)
Vanco Direct USA, LLC)
 Assignors)
) WC Docket No. _____
and)
) IB File No. _____
Global Telecom & Technology Americas, Inc.)
 Assignee)
)
Application for Consent to Assign Assets from)
Global Capacity Group, Inc. and Global)
Capacity Direct, LLC f/k/a Vanco Direct USA,)
LLC, Companies Holdings International and)
Domestic Authorizations Pursuant to)
Section 214 of the Communications Act of 1934,)
As Amended, to Global Telecom & Technology)
Americas, Inc.)

APPLICATION

Global Capacity Group, Inc. (“GCG”), its affiliate, Global Capacity Direct, LLC f/k/a Vanco Direct USA, LLC (“Vanco”) and Global Telecom & Technology Americas, Inc. (“GTT Americas” and together with GCG and Vanco, “Applicants”) hereby respectfully request authority pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214 (the “Act”), and Sections 63.04 and 63.24 of the Commission’s Rules, 47 CFR §§ 63.04, 63.24, to assign certain customer contracts and associated account information from GCG and Vanco to GTT Americas (the “Customers”). Each of the Applicants is a non-dominant telecommunications carrier

authorized by the Commission to provide both domestic and international telecommunications services. After consummation of the assignment, GTT Americas will provide telecommunications services to the Customers. GCG and Vanco will continue to hold their telecommunications authorizations and provide service to their other customers. The instant transaction includes contracts for only certain interstate data private line customers.

The proposed transaction is not expected to result in any loss or impairment of service to any of the Customers. Immediately following consummation of the transaction, the Customers will continue to receive their existing services at the same rates, terms and conditions as at present. If any changes in the rates, terms and conditions of service are made in the future, those changes will be made consistent with Commission requirements. The only material change as part of this transaction will be in the Customers' current service provider. Customers will be notified of the change in service provider in accordance with Section 64.1120 of the Commission's Rules. Customers will still be responsible for any applicable early contract termination charges or other fees under their current terms of service, if they choose a service provider other than GTT.

Pursuant to Section 63.04(b) of the Commission's Rules, 47 C.F.R. § 63.04(b), the Applicants are filing this combined application for the proposed transfer of assets. The Applicants provide below the information required by Section 63.24(e)(2) of the Commission's Rules, 47 C.F.R. § 63.24(e)(2). *Exhibit A* provides the additional information requested by Section 63.04(a)(6) through (a)(12) of the Commission's Rules, 47 C.F.R. § 63.04(a)(6)-(12).

The Applicants respectfully request streamlined treatment of this Application pursuant to Sections 63.03 and 63.12 of the Commission's Rules, 47 C.F.R. §§ 63.03 and 63.12. This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission's Rules, 47 C.F.R. § 63.03(b)(2), because (1) the proposed transaction will result in the Applicants (including their affiliates, as that term is defined in Section 3(1) of the Act) having a market share in the interstate, interexchange market of less than 10 percent; (2) Applicants (including their affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction; and (3) neither the Applicants nor any of its affiliates are regulated as dominant with respect to any service. This Application also qualifies for streamlined treatment under Section 63.12(a) and (b). In particular, Section 63.12(c)(1) is inapplicable because, as set forth below, Applicants qualify for a presumption of non-dominance pursuant to Section 63.10(a)(3) of the Commission's Rules. Furthermore, none of the other provisions contained in Section 63.12(c)(2) and (3) of the Commission's Rules apply.

The Applicants respectfully request approval of this Application as soon as possible.

I. APPLICANTS

A. GTT Americas

GTT Americas, f/k/a Global Internetworking, Inc. (FRN 0007265572), is a direct, wholly-owned subsidiary of Global Telecom & Technology, Inc. ("GTT"). GTT,

formerly known as Mercator Partners Acquisition Corp.,¹ is a publicly traded corporation (OTCBB:GTLT) organized and existing under the laws of Delaware. GTT is headquartered at 8484 Westpark Drive, Suite 720, McLean, Virginia 22102. GTT functions as a holding company that does not directly provide telecommunications service in any jurisdiction; however, through its subsidiaries, GTT provides wide-area network and wireless mobility services to more than 300 enterprise, government and carrier clients in over 70 countries, worldwide. GTT's senior management team has experience with companies like Sprint, MCI, Broadwing, Winstar and various mobility service providers.²

GTT Americas is a corporation organized under the Commonwealth of Virginia and is also located at 8484 Westpark Drive, Suite 720, McLean, Virginia 22102. GTT Americas provides point to point private line, Ethernet and IP data connectivity services to carriers, service providers, systems integrators, government agencies and medium to large sized enterprises. GTT Americas holds blanket domestic Section 214 authority and international Section 214 authority to provide global facilities-based and resold international services pursuant to authority granted by the Commission in File No. ITC-214-20020619-00332, on August 15, 2002. GTT Americas provides private line data services, dedicated Internet access service and Ethernet to its customers on a nationwide basis.

¹ Mercator Partners Acquisition Corp. ("Mercator") acquired 100% ownership and control of Global Internetworking, Inc. ("Internetworking") in File No. ITC-T/C-20060623-00329. Mercator subsequently changed its name to GTT. Internetworking subsequently changed its name to Global Telecom & Technology Americas, Inc., holder of international Section 214 authorization ITC-214-20020619-00332.

² GTT's most recent SEC Form 10-Q and additional information regarding its managerial qualifications will be provided to the Commission upon request.

GTT recently acquired WBS Connect, L.L.C. (“WBS”),³ a privately-held Colorado limited liability company located at 700 N. Colorado Boulevard, Suite 307, Denver, Colorado 80206. Founded in 2002, WBS is a provider of global technology services, offering high bandwidth Internet connections and data transport services worldwide. WBS also offers data center collocation, managed network services, business video communications services and cloud computing services. WBS has domestic Section 214 authority and international Section 214 authority granted by the Commission in File No. ITC-214-20080904-00419 to provide global or limited global resold telecommunications services. WBS provides IP transit, IP transport and collocation services on a nationwide basis.

The ownership of GTT is described in detail in Section IV below. GTT Americas does not have any other affiliates that offer domestic telecommunications services at this time.

B. GCG and Vanco

GCG (FRN 0010294528), a Texas corporation with principal offices located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606, delivers telecommunications logistics solutions to a global client set consisting of systems integrators, telecommunications companies and enterprise customers. GCG is authorized to provide resold and facilities-based local exchange and interexchange services in Alabama, Arkansas, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Massachusetts, Michigan, Mississippi, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oregon,

³ See WC Docket No. 09-202 and ITC-T/C-20091030-00464.

Pennsylvania, Rhode Island, South Dakota, Vermont, Washington, West Virginia, Wisconsin and Wyoming. GCG holds blanket domestic Section 214 authority and international Section 214 authority to provide global facilities-based and resold international services pursuant to authority granted by the Commission in File No. ITC-214-20070410-00137, on April 27, 2007.

GCG is a direct, wholly-owned subsidiary of Capital Growth Systems, Inc. (“CGSI”), a publicly-traded Florida corporation with principal offices located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606. In addition to GCG, CGSI has another subsidiary that holds domestic and international authorizations from the Commission and state telecommunications authorizations, Vanco (FRN 0013207790). Vanco is a Delaware limited liability company with principal offices also located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606. Vanco is authorized to provide global facilities-based and resale services pursuant to authority granted in File No. ITC-214-20050331-00136 and ITC-214-19990811-00546. Vanco is authorized to provide telecommunications services in Alabama, Arizona, Arkansas, California, Connecticut, Delaware, Georgia, Illinois, Indiana, Kentucky, Maine, Maryland, Massachusetts, Mississippi, Montana, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Vermont, Virginia, Washington and Wisconsin.

II. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of an Asset Purchase Agreement dated December 30, 2009 by and among CGSI, GCG, Vanco (collectively, the “Sellers”) and GTT Americas (the “Buyer”) (the “Agreement”), the Sellers intend to assign to Buyer the Customers listed in

the Agreement (the "Transaction"). As noted above, the Customers are interstate data private line customers. All the Customers are either enterprises or telecommunications carriers. After consummation of the Transaction, GTT Americas will provide telecommunications services to the Customers directly pursuant to its own telecommunications authorizations.

The proposed transfer of the Customers from GCG and Vanco to GTT Americas will have no adverse impact on the Customers. The Customers will continue to receive their existing services at the same rates, terms and conditions as at present. If any future changes to the rates, terms and conditions of service are made, those changes will be made consistent with Commission requirements. To ensure a seamless transition and avoid customer confusion or inconvenience, GTT Americas will provide advance written notice to the Customers at least thirty (30) days prior to the transfer. The advance written notice will explain the change in service provider in accordance with applicable Commission and state requirements for a transaction of this type. To comply with the Commission's slamming requirements, GTT Americas will file the required notice with the Commission in CC Docket No. 00-257 pursuant to Section 64.1120 of the Commission's Rules, 47 C.F.R. § 64.1120. Customers will still be responsible for any applicable early contract termination charges if they choose a service provider other than GTT Americas.

The closing of the Transaction will be contingent upon the receipt of the required regulatory approvals among other things.

III. PUBLIC INTEREST STATEMENT

The Transaction described herein will serve the public interest. GTT Americas has a strong management team that will continue to provide high quality telecommunications services to the Customers. Its purchase of the GCG and Vanco Customers will strengthen GTT Americas and enable it to concentrate its resources and expertise on providing innovative and diversified service offerings to customers nationwide. These enhancements will inure directly to the benefit of the Customers, as well as indirectly to consumers generally in the telecommunications marketplace.

At the same time, the proposed transfer of customers does not present any anti-competitive issues. The Applicants emphasize that, following the transfer, the former GCG and Vanco customers will continue to receive services from a qualified carrier, which services will be consistent with the quality of services currently provided by the Sellers. The Applicants anticipate that customers will experience a seamless transition of service provider. Further, the Customers will be sufficiently notified of the Transaction and their rights. In addition, no carrier is being eliminated as a result of the Transaction. GCG and Vanco will continue to provide service to customers apart from those involved in the Transaction.

In sum, the FCC's grant of this Application will serve the public interest by strengthening the competitive position of GTT Americas without negative impact to either the Customers or competition in the markets in which the GCG and Vanco operate.

IV. INFORMATION REQUIRED BY SECTION 63.24(e) OF THE COMMISSION'S RULES

The Applicants submit the following information pursuant to Section 63.24(e) of the Commission's Rules, including the information requested in Section 63.18:

(a) Name, address and telephone number of Applicants:

Global Telecom & Technology Americas, Inc. (Assignee)
8484 Westpark Drive, Suite 720
McLean, Virginia 22102
(703) 442-5500

Global Capacity Group, Inc. (Assignor)
200 S. Wacker Drive, Suite 1600
Chicago, Illinois 60606
(312) 660-5000

Global Capacity Direct, LLC f/k/a Vanco Direct USA, LLC (Assignor)
200 S. Wacker Drive, Suite 1600
Chicago, Illinois 60606
(312) 660-5000

(b) GTT Americas is a corporation organized under the laws of the Commonwealth of Virginia. GCG is a corporation organized under the laws of Texas. Vanco is a limited liability company organized under the laws of Delaware.

(c) Correspondence concerning this Application should be sent to:

For GTT:

Chris McKee
General Counsel
8484 Westpark Drive, Suite 720
McLean, Virginia 22102
(703) 442-5500

With a copy to:

Brad E. Mutschelknaus
Melissa Conway
KELLEY DRYE & WARREN LLP
3050 K Street NW, Suite 400
Washington, D.C. 20007
Tel: (202) 342-8552
Fax: (202) 342-8451
mconway@kelleydrye.com

For GCG and Vanco:

Patrick C. Shutt
Chief Executive Officer
200 S. Wacker Drive, Suite 1650
Chicago, Illinois 60606

(312) 660-5000

With a copy to:

Mitchell D. Goldsmith, Esq.
M. Gavin McCarty, Esq.
Kate E. Rager, Esq.
SHEFSKY & FROELICH LTD.
111 East Wacker Drive, Suite 2800
Chicago, IL 60601
Telephone: 312-527-4000
Facsimile: 312-527-4011
mgoldsmith@shesksylaw.com
gmccarty@shesksylaw.com
krager@shesksylaw.com

- (d) GTT Americas holds blanket domestic Section 214 authority and international Section 214 authority to provide global facilities-based and resold international services pursuant to authority granted by the Commission in File No. ITC-214-20020619-00332, on August 15, 2002. GCG holds blanket domestic Section 214 authority and international Section 214 authority to provide global facilities-based and resold international services pursuant to authority granted by the Commission in File No. ITC-214-20070410-00137, on April 27, 2007. Vanco holds blanket domestic Section 214 authority and international Section 214 authority to provide global facilities-based and resale services pursuant to authority granted in File No. ITC-214-20050331-00136 and ITC-214-19990811-00546.
- (h) The following entities and persons hold, directly or indirectly, a 10% or greater interest in Applicants as calculated pursuant to the Commission's ownership attribution rules for wireline and international carriers.⁴

Information concerning the ten percent or greater shareholders of Assignee:

As described above, GTT Americas, a privately-held corporation organized under the laws of the Commonwealth of Virginia, is located at 8484 Westpark Drive, Suite 720, McLean, Virginia 22102. GTT Americas holds the FCC authorizations referenced above and provides service as described herein. GTT Americas is wholly owned by GTT, a publicly held corporation organized under the laws of Delaware and located at 8484 Westpark Drive, Suite 720, McLean, Virginia 22102. GTT's principal business is to function as holding company for its telecommunications subsidiaries.

The following persons or entities hold 10% or more of the outstanding equity interests of GTT:

⁴ While the Commission's rules require this information only for the assignee/transferee, Applicants are providing ownership information for the assignors as well for the Commission's convenience.

(1) Universal Telecommunications, Inc. ("Universal") and H. Brian Thompson ("Mr. Thompson"): Universal, a Delaware corporation, holds 27% of the outstanding common stock of GTT. Universal is located at 1950 Old Gallows Road, Vienna, Virginia 22182. Universal's principal business is private equity investment and advisory services. H. Brian Thompson ("Mr. Thompson") holds a majority of the outstanding common stock of Universal, with the remainder of the stock held by members of Mr. Thompson's family. Mr. Thompson is also Chairman, President and CEO of Universal. Thus, under the Commission's attribution rules, Mr. Thompson holds 27% of GTT through Universal. Mr. Thompson also holds additional shares of GTT directly, giving him a total ownership interest in GTT, including his ownership through Universal, of 30%. The address of Mr. Thompson, a U.S. citizen, is 8484 Westpark Drive, Suite 720, McLean, Virginia 22102. The principal business of Mr. Thompson is telecommunications investment.

(2) J. Carlo Cannell ("Mr. Cannell"): Anegada Master Fund Limited ("Anegada"), Tonga Partners, L.P. ("Tonga") and Tonga Partners QP, L.P. ("Tonga QP" and collectively with Anegada and Tonga, the "Funds") collectively hold 22% of the outstanding common stock of GTT. The Funds are located at 240 West Deloney Avenue, P.O. Box 3459, Jackson, Wyoming 83001 and their principal business is investment. Cannell Capital LLC, a limited liability company formed under the laws of California, acts as investment advisor to Anegada, a fund created under the laws of California, and is the general partner of and investment advisor to Tonga, a limited partnership formed under the laws of California, and Tonga QP, a limited partnership formed under the laws of California. Cannell Capital LLC has a principal business of investment and is located at 240 West Deloney Avenue, P.O. Box 3459, Jackson, Wyoming 83001. Mr. Cannell is the sole managing member of Cannell Capital LLC and possesses the sole power to vote the direct the disposition of all securities of GTT held by the Funds. Mr. Cannell is a U.S. citizen and his address is 240 West Deloney Avenue, P.O. Box 3459, Jackson, Wyoming 83001. The principal business of Mr. Cannell is telecommunications investment.

There are no other persons or entities that hold 10% or more of the outstanding equity interests of GTT.

GTT has no interlocking directorates with any foreign carrier.

Information concerning the ten percent or greater shareholders of Assignors:

As described above, GCG, a Texas corporation with principal offices located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606, holds the FCC authorizations referenced above and provides services as described herein. Vanco,

a Delaware limited liability company with principal offices located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606, holds the FCC authorizations referenced above and provides services as described herein. Vanco is a direct, wholly-owned subsidiary of Capital Growth Acquisition, Inc., a Delaware corporation with principal offices located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606, that was formed for the purpose of acquiring Vanco and has no business or operations. Capital Growth Acquisition, Inc. is a direct, wholly owned subsidiary of CGSI.

GCG and Vanco (through Capital Growth Acquisition, Inc.) are wholly owned by CGSI, a publicly held corporation organized under the laws of Florida and located at 200 S. Wacker Drive, Suite 1600, Chicago, Illinois 60606. CGSI's principal business is to function as holding company for its telecommunications subsidiaries.

The following person is the only shareholder holding a 10% or greater interest in CGSI:

Name:	David J. Lies
Address:	1701 East Lake Avenue, Suite 260 Glenview, Illinois 60025-2089
Ownership:	12.7%
Citizenship:	United States
Principal Business:	Realtor

There are no other persons or entities that hold 10% or more of the outstanding equity interests of CGSI.

GCG and Vanco do not have any interlocking directorates with any foreign carrier.

- (i) GTT Americas holds authority to provide interexchange services in Canada on a resale basis. GTT Americas is also affiliated with the following subsidiaries of GTT: GTT - EMEA, formerly known as European Telecommunications & Technology, a non-dominant carrier formed under the laws of Great Britain that is authorized to provide telecommunications services in Singapore and the United Kingdom; Global Telecom & Technology SARL, a non-dominant carrier formed under the laws of France that is authorized to provide telecommunications services in France; GTT Global Telecom & Technology Deutschland GmbH, a non-dominant carrier formed under the laws of Germany that is authorized to provide telecommunications services in Germany; European Telecommunications & Technology (S) Pte Ltd, a non-dominant carrier formed under the laws of Singapore that is authorized to provide telecommunications services in Singapore; and ETT (European Telecommunications & Technology) Private Limited, a non-dominant carrier formed under the laws of India that is authorized to provide telecommunications services in India (collectively, the "GTT Foreign

Subsidiaries"). GTT Americas is also affiliated with WBS Europe, a company formed under the laws of Ireland that sells private line services in Ireland. WBS Europe, GTT Americas and the GTT Foreign Subsidiaries lack market power in their respective destination markets. Furthermore, Canada, Singapore, the United Kingdom, France, Germany, Ireland and India are all WTO member countries.

- (j) GTT Americas will continue to provide interexchange services in Canada on a resale basis. An entity that owns or controls more than 25% of GTT Americas, GTT, owns and controls the GTT Foreign Subsidiaries, foreign carriers in their respective countries. The GTT Foreign Subsidiaries will continue to provide international telecommunications services from the United States to the destination countries listed in paragraph (i) above.
- (k) Canada, Singapore, the United Kingdom, France, Germany, Ireland and India are all WTO member countries.
- (l) For routes between the United States on one end and Canada, Singapore, the United Kingdom, France, Germany, Ireland and India on the other, GTT Americas, the GTT Foreign Subsidiaries and WBS Europe satisfy the requirements of Section 63.10(a)(3) of the Commission's Rules. Specifically, GTT Americas, the GTT Foreign Subsidiaries and WBS Europe hold significantly less than a 50% market share in the relevant international transport and local access markets. Moreover, as new entrant competitive carriers, they do not have any ability to discriminate against unaffiliated U.S. international carriers through the control of bottleneck services or facilities in the relevant countries. GTT Americas, the GTT Foreign Subsidiaries and WBS Europe do not appear on the Commission's list of foreign telecommunications carriers presumed to possess market power in foreign telecommunications markets. Accordingly, GTT Americas, the GTT Foreign Subsidiaries and WBS Europe are presumptively non-dominant and therefore presumed to lack sufficient market power to adversely affect competition on the international end of the U.S./Canada, Singapore, U.K., France, Germany, Ireland and India routes.
- (m) For the reasons set forth in (l) above and pursuant to Commission Rule Section 63.10(a)(3), following the Transaction, the Applicants will continue to be presumptively classified as non-dominant carriers.
- (n) As evidenced by the signatures to this Application, the Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and that the Applicants will not enter into such agreements in the future.
- (o) As evidenced by the signatures to this Application, Applicants certify that, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, they are

not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

- (p) Applicants request streamlined processing of this Application pursuant to Section 63.12(a) and (b) of the Commission's Rules, 47 C.F.R. § 63.12(a) and (b). In particular, Section 63.12(c)(1) is inapplicable because, as set forth above, Applicants qualify for a presumption of non-dominance pursuant to Section 63.10(a)(3) of the Commission's Rules. Furthermore, none of the other provisions contained in Section 63.12(c)(2) and (3) of the Commission's Rules apply.

V. INFORMATION REQUIRED BY SECTION 63.04(b) OF THE COMMISSION'S RULES

In accordance with the requirements of Section 63.04(b) of the Commission's Rules, the additional information required for the domestic Section 214 transfer of control application is provided in *Exhibit A*.

VI. CONCLUSION

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by grant of this Application.

Respectfully submitted,

**Global Capacity Direct,
LLC f/k/a Vanco Direct
USA, LLC**

By: George A. King
George A. King
President
200 S. Wacker Drive
Suite 1650
Chicago, Illinois
60606
(312) 660-5000

**Global Capacity Group,
Inc.**

By: George A. King
George A. King
President
200 S. Wacker Drive
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**Global Telecom &
Technology Americas, Inc.**

By: Chris McKee
Chris McKee
General Counsel
8484 Westpark Drive,
Suite 720
McLean, Virginia 22102
(703) 442-5500

Dated: December 30, 2009

VI. CONCLUSION

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by grant of this Application.

Respectfully submitted,

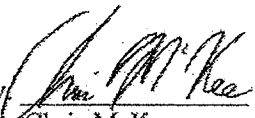
**Global Capacity Direct,
LLC f/k/a Vanco Direct
USA, LLC**

By: _____
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**Global Capacity Group,
Inc.**

By: _____
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**Global Telecom &
Technology Americas, Inc.**

By: 
Chris McKee
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8484 Westpark Drive,
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(703) 442-5500

Dated: December 30, 2009

EXHIBIT A

DOMESTIC SECTION 214 TRANSFER OF CONTROL INFORMATION

In accordance with the requirements of Section 63.04(b) of the Commission's Rules, 47 C.F.R. § 63.04, the Applicants provide the following information in support of their request.

63.04(b)(6): Description of the Transactions

The proposed transaction is described in Section II of the Application.

63.04(b)(7): Description of Geographic Service Area and Services in Each Area

A description of the geographic service areas and services provided in each area is provided in Section I of the Application.

63.04(b)(8): Presumption of Non-Dominance and Qualification for Streamlining

This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) of the Commission's Rules, 47 C.F.R. § 63.03(b)(2)(i). Following consummation of the proposed transaction, (1) Applicants (including their affiliates) will have a market share in the interstate, interexchange market of substantially less than 10 percent; (2) Applicants (including their affiliates) will provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not party to the transaction; and (3) none of the Applicants or their affiliates are dominant with respect to any service.

63.04(b)(9): Other Pending Commission Applications Concerning the Proposed Transaction

None.

63.04(b)(10): Special Considerations

None.

63.04(b)(11): Waiver Requests (If Any)

None.

63.04(b)(12): Public Interest Statement

The proposed transaction is in the public interest for the reasons detailed in Section III of the Application.