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IN REFERENCE TO:
027111-00002

April 8, 2011

Via FedEx

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

Re: In the Matter of the Joint Application of Global Capacity Group, Inc. and Global Capacity Direct, LLC, Assignors, and GC Pivotal, LLC, Assignee, for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, and Section 63.04 to Complete the Transfer of Assets to GC Pivotal, LLC

Docket: WC 11-64

Dear Ms. Dortch:

On behalf of Global Capacity Group, Inc. and Global Capacity Direct, LLC, this letter shall serve as a supplemental to the application filed on April 5, 2011, (“Application”) in Docket WC 11-64. The following are clarifications to the Application.

First, the Application on page 5 incorrectly references Global Capacity Group, Inc. as a limited liability company. Global Capacity Group, Inc., an assignor, is a Texas corporation.

Second, the reference in footnote 4 to footnote 1 is incorrect. The corrected statement is as follows: "Information about Mr. Najafi is provided above in footnote 3".

Third, this supplemental filing shall serve as a statement, correction and clarification to Part II, Section 4 of the Application. The Application correctly identifies in Exhibit C that Pivotal Global Capacity, LLC is sole member of Assignee, GC Pivotal, LLC. And, FFN Investments, LLC. is sole member of Pivotal Global Capacity, LLC, and its members are correctly identified in Part II, Section (4) and Exhibit C to the Application.

The following should be included in Part II, Section 4 of the Application:

"(a) Assignee is wholly-owned by Pivotal Global Capacity, LLC. The name, address, citizenship, and principal business of Pivotal Global Capacity, LLC., are as follows:

Name:	Pivotal Global Capacity, LLC.
Principal Business:	Holding company of GC Pivotal, LLC.
Address:	3200 East Camelback Road, Suite 295 Phoenix, AZ 85018
Citizenship:	Arizona
Ownership Interest:	100%"

In addition, the reference to "Assignee" in the current subsection (a) of Part II, Section 4 to the Application, should be omitted and "Pivotal Global Capacity, LLC." should be inserted to state that FFN Investments, LLC., wholly owns Pivotal Global Capacity, LLC.

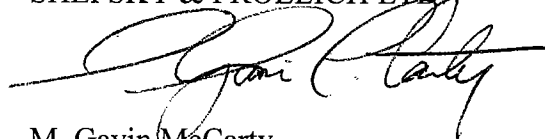
The telecommunication assets of Global Capacity Direct, LLC, and Global Capacity Group, Inc., will be acquired by and assigned to GC Pivotal, LLC, pursuant to the terms of that Asset Purchase Agreement as approved and directed by the Court in the Bankruptcy Order Approving Sale attached as Exhibit B to the Application.

Finally, this supplemental filing shall serve as a statement and clarification that Assignee, its parent entities and related companies, have no telecommunication affiliates.

Please contact the undersigned with any additional questions or requests for clarification.

Respectfully submitted,

SHEFSKY & FROELICH LTD

A handwritten signature in black ink, appearing to read "Gavin McCarty", written over a horizontal line.

M. Gavin McCarty
Counsel for Global Capacity Group, Inc., Global
Capacity Direct, LLC and GC Pivotal, LLC

MGM/ds/1178762_1
Enclosures