

Morgan Lewis

Russell M. Blau
Brett Ferenchak
Stephany Fan

russell.blau@morganlewis.com
brett.ferenchak@morganlewis.com
stephanyfan@gmail.com

December 7, 2018

VIA IBFS

Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554
Attn: International Bureau

**Re: Notice of a *Pro Forma* Consolidation of Transbeam, Inc. into GC Pivotal, LLC
d/b/a Global Capacity**

Dear Secretary Dortch:

GC Pivotal, LLC d/b/a Global Capacity ("Global Capacity"), pursuant to 47 C.F.R. § 63.24(f), notifies the Commission of the *pro forma* internal consolidation of its affiliate, Transbeam, Inc. ("Transbeam") and its international Section 214 authorization (the "Authorization") into Global Capacity (the "Consolidation") completed on November 7, 2018.¹ Since the both Transbeam and Global Capacity were direct, wholly owned subsidiaries of GTT Americas, LLC ("GTTA"), the Consolidation was *pro forma* in nature.

Information Required by Section 63.24(f)(2)

As required by Section 63.24(f)(2), the Parties provide the following information required by 63.18(a) through (d) and (h):

¹ Transbeam and Global Capacity are collectively referred to as the "Parties."

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Ave., NW
Washington, DC 20004-2541
United States

T +1.202.739.3000
F +1.202.739.3001

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Sections 63.18(a): Name, address and telephone number of the Parties:

Transbeam, Inc.
GC Pivotal, LLC d/b/a Global Capacity
c/o GTT Communications
7900 Tysons One Place, Suite 1450
McLean, VA 22102
Tel: 703-442-5500

Sections 63.18(b): Organization of the Parties:

Transbeam was a Delaware corporation.

Global Capacity is a Delaware limited liability company.

Section 63.18(c): Correspondence concerning this filing should be sent to the Parties' counsel:

Russell M. Blau
Brett P. Ferenchak
Stephany Fan
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave, N.W.
Washington, DC 20004
202-739-3000 (Tel)
202-739-3001 (Fax)
russell.blau@morganlewis.com
brett.ferenchak@morganlewis.com
stephany.fan@morganlewis.com

Section 63.18(d): The Parties hold or held the following Authorizations:

Transbeam held international Section 214 authority to provide global or limited global facilities-based and resale services granted in IB File No. ITC-214-20061101-00500.

Global Capacity holds international Section 214 authority to provide global or limited global facilities-based and resale services granted in IB File No. ITC-214-20110201-00049.

Sections 63.18(h): See **Attachment 1** for the ownership of the Parties. See **Attachment 2** for pre- and post-*Consolidation* corporate structure of the Parties.

The Parties certify that the *Consolidation* was *pro forma* and that, together with all previous *pro forma* transactions, did not result in a change in the actual controlling party of the Parties or their Authorizations.

* * * *

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This notification letter is being filed electronically via MyIBFS. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Brett P. Ferenchak

Catherine Wang
Brett P. Ferenchak

Counsel for the Parties

ATTACHMENT 1

Answer to Question 11 - Section 63.18(h) Ownership Information

The following entities currently hold, directly or indirectly, a 10% or greater interest¹ in GC Pivotal, LLC d/b/a Global Capacity ("Global Capacity"), as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

Name:	GTT Americas, LLC ("GTTA")
Address:	7900 Tysons One Place, Suite 1450 McLean, Virginia 22102
Citizenship:	U.S. (Delaware)
Principal Business:	Telecommunications
% Interest:	100% (directly in Global Capacity)
Name:	GTT Communications, Inc. ("GTT Parent")
Address:	7900 Tysons One Place, Suite 1450 McLean, Virginia 22102
Citizenship:	U.S. (Delaware)
Principal Business:	Communications
% Interest:	100% (indirectly, as 100% owner of GTTA)

GTT Parent is a publicly traded company (NYSE: GTT) whose stock ownership varies on a daily basis. Based on information filed with the SEC with respect to GTT Parent and other information provided to or known by GTT Parent, no person or entity currently holds a 10% or greater direct or indirect interest in GTT Parent except the following:

Name:	Universal Telecommunications, Inc. ("UTI")
Address:	1950 Old Gallows Rd., Suite 201 Vienna, VA 22182
Citizenship:	U.S. (Delaware)
Principal Business:	Investments
% Interest:	Approx. 12.5% (directly in GTT Parent)

¹ Unless otherwise indicated, the ownership interests provided herein represent both equity and voting interests.

Name: H. Brian Thompson
Address: c/o Universal Telecommunications
1950 Old Gallows Rd., Suite 201
Vienna, VA 22182
Citizenship: U.S. and Ireland
Principal Business: Individual
% Interest: Approx. 12.5% (indirectly in GTT Parent, as the majority shareholder of UTI)

Name: The Spruce House Partnership LP ("Spruce House")
Address: c/o Spruce House Capital LLC
435 Hudson Street, 8th Floor
New York, NY 10014
Citizenship: U.S. (Delaware)
Principal Business: Investment Fund
% Interest: Approx. 19.9% (directly in GTT Parent)

Name: Spruce House Capital LLC ("Spruce House Capital")
Address: 435 Hudson Street, 8th Floor
New York, NY 10014
Citizenship: U.S. (Delaware)
Principal Business: Partnership
% Interest: Approx. 19.9% (indirectly in GTT Parent as the General Partner of Spruce House)

Name: Spruce House Investment Management LLC ("Spruce House Investment")
Address: 435 Hudson Street, 8th Floor
New York, NY 10014
Citizenship: U.S. (Delaware)
Principal Business: Partnership
% Interest: Approx. 19.9% (indirectly in GTT Parent as the fund manager of Spruce House)²

Name: Zachary Sternberg
Benjamin Stein
Address: c/o Spruce House Investment Management LLC
435 Hudson Street, 8th Floor
New York, NY 10014
Citizenship: U.S.
Principal Business: Individuals
% Interest: Approx. 19.9% (indirectly in GTT Parent as the managing members of Spruce House Capital and Spruce House Investment)

² See SEC Form 13-G filed by GTT Parent on November 8, 2018, available at <https://www.sec.gov/Archives/edgar/data/1315255/000119312518324669/d650934dsc13ga.htm> (the "GTT's SEC Form 13-G").

GTT Parent has no knowledge of any other person or entity having a 10% or greater ownership interest in GTT Parent through Spruce House.

Answer to Question 12 - Section 63.18(h) Interlocking Directorates

Global Capacity is a foreign carrier in Canada and the United Kingdom. Its subsidiary, Global Capacity Limited, is a foreign carrier in the United Kingdom. Except for Global Capacity Limited and the foreign carrier affiliates list below, which share certain officers and/or directors as Global Capacity, Global Capacity does not have any interlocking directorates with a foreign carrier.

Global Capacity is also affiliated within the meaning of Section 63.09(e) of the Commission's rules, 47 C.F.R. § 63.09(e), with the following foreign carriers (collectively, the "GTT Foreign Carriers"):

- (1) GTT EMEA, Ltd., a United Kingdom entity;
- (2) Tinet S.p.A, an Italian entity;
- (3) Tinet GmbH, a German entity;
- (4) GTT Communications HK limited, a Hong Kong entity;
- (5) Hibernia Atlantic Communications (Canada) Company, a Canadian entity;
- (6) Hibernia Atlantic Cable System Limited, an Irish entity;
- (7) Hibernia Atlantic (UK) Limited, a United Kingdom entity;
- (8) Hibernia Media (UK) Limited, a United Kingdom entity;
- (9) Hibernia Atlantic (Singapore) Private Limited, a Singapore entity;
- (10) Hibernia Networks (Netherlands) B.V., a Dutch entity;
- (11) Hibernia Express (Ireland) Limited, an Irish entity;
- (12) Hibernia Express (Canada) Limited, a Canadian entity;
- (13) Hibernia Express (UK) Limited, a United Kingdom entity;
- (14) Hibernia Atlantic U.S. LLC, a Washington limited liability company;
- (15) Perseus do Brasil Servicos de Tecnologia da Informacao Ltda, a Brazilian entity;
- (16) Interoute Austria GmbH, an Austrian entity;
- (17) Interoute Communications Belgium, a Belgian entity;
- (18) Interoute Belgium, a Belgian entity;
- (19) Interoute Managed Services Belgium, a Belgian entity;
- (20) Interoute Bulgaria EDD, a Bulgarian entity;
- (21) Interoute Czech s.r.o., a Czech Republic entity;
- (22) Interoute Finland Oy, a Finish entity;
- (23) Interoute France SAS, a French entity;
- (24) Vianet, a French entity;
- (25) Easynet, a French entity;
- (26) Interoute Germany GmbH, a German entity;
- (27) Easynet Global Services GmbH, a German entity;
- (28) Hong Kong Easynet Technology Company Limited, a Hong Kong entity;
- (29) Interoute Hungary Távközlési Kft., a Hungarian entity;
- (30) Interoute S.p.A., an Italian entity;
- (31) Easynet S.R.L., an Italian entity;

- (32) Interoute Belgium S.A., a Belgian entity;
- (33) Interoute Managed Services Netherlands B.V. SCHIPHOL-RIJK, a Dutch entity;
- (34) Interoute Poland Sp. z o.o., a Polish entity;
- (35) Interoute SRL (FOSTA CE COM ROMANIA), a Romanian entity;
- (36) Interoute Singapore Pte. Limited, a Singapore entity;
- (37) Interoute Slovakia s.r.o., a Slovakian entity;
- (38) Interoute Iberia, SA, a Spanish entity;
- (39) Interoute Communications Limited c/o Interoute Sweden AB, a Swedish entity;
- (40) Interoute Managed Service Sweden AB, a Swedish entity;
- (41) Interoute Managed Services Suisse Sàrl, a Swiss entity;
- (42) Interoute İletisim Hizmetleri Limited Şirketi, a Turkish entity;
- (43) Interoute Communications Limited, a United Kingdom entity;
- (44) Accelerated Connections, a Canadian entity;
- (45) Custom Connect MW B.V., a Dutch entity;
- (46) Custom Connect B.V., a Dutch entity.

The GTT Foreign Carriers operate in the following countries, each a member of the WTO:

Austria, Belgium, Brazil, Bulgaria, Canada, China, Czech Republic, Denmark, Finland, France, Germany, Hong Kong, Hungary; Ireland, Italy, Japan, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Romania, Singapore, Slovakia, Spain, Sweden, Switzerland, Turkey, and the United Kingdom.

Answer to Question 13 - Description of Consolidation

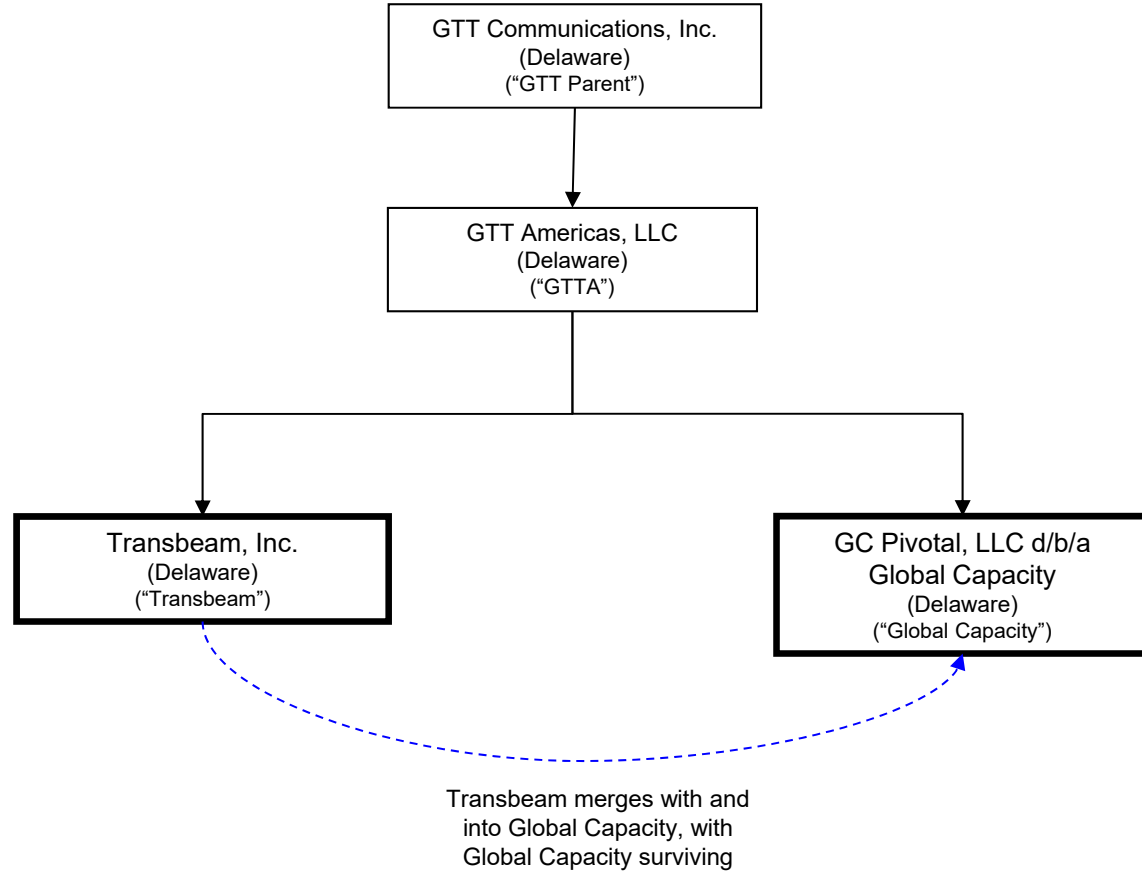
In order to simplify its corporate structure, GTT Parent undertook certain *pro forma* intra-company changes including the *Consolidation*. The *Consolidation* consisted of the merger of Transbeam with and into Global Capacity, whereupon the separate existence of Transbeam ceased and Global Capacity survived. Charts depicting the corporate organizational structure of the Parties before and after the *Consolidation* are appended hereto as Attachment 2.

As noted above, Transbeam no longer exists as a separate corporate entity following the *Consolidation*. The Transaction did not result in an interruption or disruption of service because, at completion of the *Consolidation*, Global Capacity became the service provider for Transbeam's customers. The *Consolidation* did not result in any change to the services received by Transbeam's customers, including rates, terms and conditions of service, pursuant to individual contracts that were assumed by Global Capacity at completion of the *Consolidation*.

ATTACHMENT 2

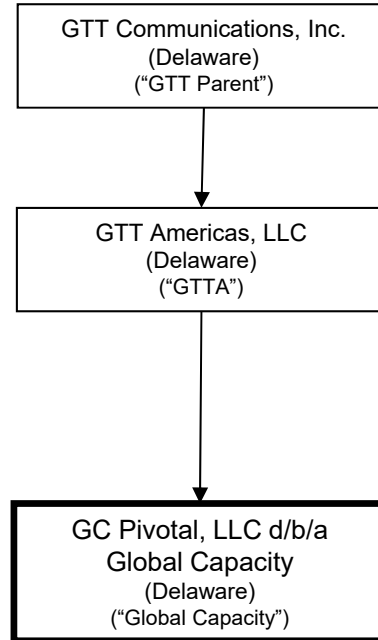
Pre-*Consolidation* and Current Corporate Ownership Structure Charts

Pre-Consolidation Ownership Structure of Applicants and Depiction of Consolidation



Unless indicated all ownership percentages are 100%.

Current Ownership Structure of Global Capacity



Unless indicated all ownership percentages are 100%.

VERIFICATION

I, Tony Hansel, hereby declare that I am Vice President and Deputy General Counsel of GTT Communications, Inc. ("GTT"); that I am authorized to make this Verification on behalf of the GTT and its subsidiaries (collectively, the "Company"); and that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of December, 2018.



Tony Hansel
Vice President and Deputy General Counsel
GTT Communications, Inc.