

ATTACHMENT 1

On behalf of GTT Communications, Inc. (“GTT”), and its wholly owned subsidiaries, GTT Americas, LLC (“GTT Americas”) and GC Pivotal, LLC (“GC Pivotal”) (collectively, the “GTT Subsidiaries”), and pursuant to Section 63.24(f)(2) of the rules¹ of the Federal Communications Commission (the “Commission”), the Commission is hereby notified of the pro forma assignment of the GTT Subsidiaries.

Answer to Question 10 – Section 63.18 (c)-(d)

Correspondence concerning the application should be directed to:

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GTT Communications, Inc. does not hold any Section 214 authorizations itself, but directly or indirectly controls the GTT Subsidiaries that hold such authorizations to provide domestic and international telecommunications services. GTT Americas, a Delaware limited liability company, holds domestic Section 214 authority and global or limited global facilities-based and resale international Section 214 authority, pursuant to IB File No. ITC-214-20020619-00332. GC Pivotal, a Delaware limited liability company, holds domestic Section 214 authority and global or limited global facilities-based and resale international Section 214 authority, pursuant to IB File Nos. ITC-214-20110201-00049 and ITC-214-20061101-00500.

¹ 47 C.F.R. § 63.24(f)(2).

Answer to Question 11 – Section 63.18(h)

GTT Americas, LLC and GC Pivotal, LLC are indirect wholly-owned subsidiaries of GTT Communications, Inc., which prior to the filing of Chapter 11 Bankruptcy Petitions on October 31, 2021, was a widely-held company, with only one entity or individual directly or indirectly holding a 10 percent or greater ownership interest. Specifically, prior to the filing of the Petitions, the Spruce House Partnership LLC held a 25.01% voting interest in GTT, and it will hold the same 25.01% voting interest during the court-supervised restructuring process.

The ownership information for GTT, Spruce House, and the intermediate GTT Holding companies is:

Name: GTT Communications, Inc.
Address: 7900 Tysons One Place, Suite 1450
McLean, VA 22102
Citizenship: Delaware
Principal Business: Holding company
Ownership Interest: 100% of GTT Subsidiaries

Name: Spruce House Partnership LLC
Address: 435 Hudson Street, Suite 804
New York, NY 10014
Citizenship: Delaware
Principal Business: Pooled investment fund
Ownership Interest: 25.01% voting interest in GTT

Name: GTT Apollo, LLC
Address: 7900 Tysons One Place, Suite 1450
McLean, VA 22102
Citizenship: Delaware
Principal Business: Holding company
Ownership Interest: 100% of direct interest in GTT Americas and 100% indirect interest in GC Pivotal

Name: GTT Apollo Holdings, LLC
Address: 7900 Tysons One Place, Suite 1450
McLean, VA 22102
Citizenship: Delaware
Principal Business: Holding company
Ownership Interest: 100% indirect interest in GTT Subsidiaries

Name: GTT RemainCo, LLC
 Address: 7900 Tysons One Place, Suite 1450
 McLean, VA 22102
 Citizenship: Delaware
 Principal Business: Holding company
 Ownership Interest: 95% direct interest in GTT Apollo Holdings, LLC and
 100% indirect interest in GTT Subsidiaries

Organizational diagrams illustrating the applicant’s vertical ownership structure pursuant to amended 47 C.F.R. § 63.24(f)(2)(i), showing pre-transaction and post-transaction ownership during the court-supervised restructuring process are shown in Attachment 1.

Answer to Question 12 –Interlocking Directorates with Foreign Carriers

GTT Americas and GC Pivotal have foreign carrier affiliates that operate within the following World Trade Organization member countries: Austria, Belgium, Brazil, Bulgaria, Canada, Czech Republic, Denmark, Finland, France, Germany, Hong Kong, Hungary, India, Italy, Mexico, Netherlands, Norway, Poland, Romania, Singapore, Slovakia, Spain, Sweden, Switzerland, Turkey, and the United Kingdom.

Specifically, GTT Americas and GC Pivotal are affiliated with the foreign carriers listed in the table below.

Donna Granato is Chief Financial Officer of GTT Communications, Inc., and Vice President, Secretary, Treasurer, and Chief Financial Officer of GTT Americas, LLC and GC Pivotal, LLC. Don MacNeil is Chief Operating Officer of GTT Communications, Inc., and Vice President, Chief Operating Officer, and Assistant Secretary of GTT Americas, LLC, and GC Pivotal, LLC. Ms. Granato and Mr. MacNeil may also serve as officers or directors of the identified foreign carriers.

| Foreign Affiliate | Country |
|--|----------------|
| Accelerated Connections, Inc. | Canada |
| Communications GTT Mexico | Mexico |
| Easynet SAS | France |
| GTT Cloud Austria GmbH | Austria |
| GTT Communications Belgium NV | Belgium |
| GTT Brasil Telecomunicacoes Ltda | Brazil |
| GTT Bulgaria JSCo | Bulgaria |
| GTT Communications GmbH | Germany |
| GTT Communications HK Limited | Hong Kong |
| GTT Communications India Private Limited | India |
| GTT Communications Srl | Italy |

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|---|----------------|
| GTT Communications Switzerland Sarl | Switzerland |
| GTT Finland Oy | Finland |
| GTT International Telekomunikasyon Hizmetleri Limited Sirketi | Turkey |
| GTT-EMEA Limited | United Kingdom |
| Interoute Cloud Czech s.r.o. | Czech Republic |
| Interoute Managed Services Denmark A/S | Denmark |
| Interoute Cloud Netherlands BV | Netherlands |
| Interoute Cloud Netherlands BV – Amsterdam Sucursala Bucuresti – Bucharest Branch | Romania |
| Interoute Cloud Netherlands BV – Norway Branch | Norway |
| Interoute Cloud Netherlands BV – Slovakia Branch | Slovakia |
| Interoute Cloud Netherlands BV – Hungary Branch | Hungary |
| Interoute Cloud Netherlands BV – Poland Branch | Poland |
| Interoute Cloud Italy S.r.l. | Italy |
| Interoute Cloud Spain S.L.U. | Spain |
| Interoute Singapore Pte. Limited | Singapore |
| Videokonferensbolaget Försäljning I Sverige AB | Sweden |

Answer to Question 13 – Means by Which the Proposed Assignment Will Take Place

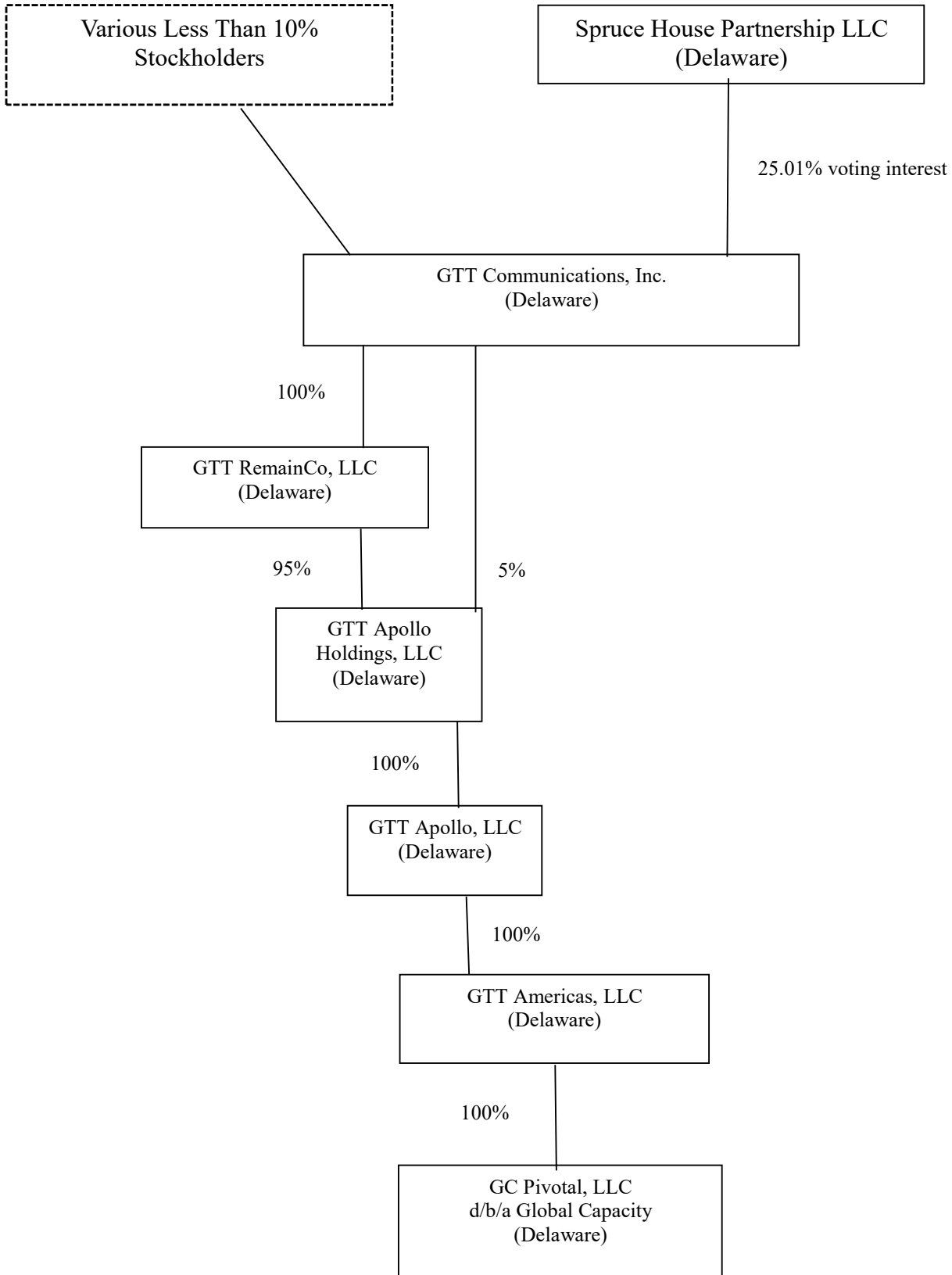
On October 31, 2021, GTT and certain of its affiliated debtors, including the GTT Subsidiaries, filed voluntary petitions (“Petitions”) for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York, commencing prepackaged chapter 11 cases to reorganize under the Bankruptcy Code (the “Chapter 11 Cases”).² The filing of the Petitions converted the legal status of GTT and the GTT Subsidiaries to debtors-in-possession. The Petitions did not otherwise change the ownership or control of the GTT Subsidiaries.

² The Chapter 11 Cases are being jointly administered under the caption *In re GTT Communications, Inc., et al.*, Case No. 21-11880 (MEW). Additional information related to the Restructuring and the Chapter 11 Cases is available via a dedicated web page at: <https://cases.primeclerk.com/GTT>, which will be updated periodically.

EXHIBIT 1

Pre- and Post-Bankruptcy Filing Ownership Structure Charts

Pre-Bankruptcy Ownership Structure Chart



**Post-Bankruptcy Filing Ownership Structure Chart
(During Court-Supervised Restructuring Process)**

