BINGHAM

COPY

Catherine.Wang@Bingham.com Direct Phone: (202) 373-6037 Direct Fax: (202) 373-6001 Catherine Wang

Direct Fax: Direct Phone: Troy F. Tanner Troy.Tanner@Bingham.com (202) 373-6560 (202) 373-6464

LEGAL INSIGHT. BUSINESS INSTINCT.

December 11, 2007

## Via ECFS and Courier

Washington, D.C. 20002 236 Massachusetts Avenue, N.E., Suite 110 c/o Natek, Inc. Federal Communications Commission Marlene H. Dortch, Secretary

Re: WC Docket No. 07-224

**Transfer of Control** to Section 214 of the Communications Act of 1934 to Complete a Broadview Networks Holdings, Inc. for Grant of Authority Pursuant SUPPLEMENT to the Application of MCG Capital Corporation and ITC-T/C-20071001-00400, ITC-T/C-20071001-00401, ITC-T/C-20071001-00402, ITC-T/C-20071001-00403 IB File Nos. ITC-T/C-20071001-00398, ITC-T/C-20071001-00399

Dear Ms. Dortch:

more of the equity or voting interests of Broadview Holdings as a result of the public in the Applicants, including any individual or entity that has shares constituting 10% or within 30 days of the completion of the public offering as to the final ownership interests private placement of Broadview Holdings' stock. Applicants agree to notify the FCC sell a portion of their shares in the public market. common stock to be sold in the public market. In addition, existing shareholders of will common stock. As described in the S-1 filing, Broadview Holdings will issue new update their pending transfer of control applications in the above-referenced proceedings to advise the Commission that on November 30, 2007, Broadview Holdings filed an S-1 and TruCom Corporation (collectively, "Applicants"), through their undersigned counsel with the Securities Exchange Commission to conduct an initial public offering of Inc., Eureka Telecom, Inc., Eureka Telecom of VA, Inc., InfoHighway of Virginia, Inc., Broadview Networks, Inc., Broadview NP Acquisition Corp., BridgeCom International, Holdings, Inc. ("Broadview Holdings"), A.R.C. Networks, Inc., ATX Licensing, Inc., Pursuant to staff's request, MCG Capital Corporation, Broadview Networks Applicants do not plan to conduct a

202.373.6000 202.373.6001 20006-1806

A/72346971.1

bingham.com

Bingham McCutchen LLP 2020 K Street NW Washington, DC

Orange County Silicon Valley Santa Monica San Francisco Walnut Creek Washington Los Angeles New York Tokyo

Hong Kong London

Hartford

Boston

FILED/ACCEPTED DEC 1 1 2007

Federal Communications Commission Office of the Secretary

## RECEIVED

APR 08 2008

Policy Division

International Bureau

Marlene H. Dortch, Secretary December 11, 2007 Page 2

offering, and thus has a 10% or greater direct or indirect equity or voting interest in the Applicants.

questions regarding this filing, please do not hesitate to contact the undersigned at (202) stamp the extra copy and return it in the envelope provided. Should you have any in the above-referenced Wireline Competition Bureau docket via ECFS. Please date 373-6560. enclosed for filing with the International Bureau. A copy of this letter is also being filed referenced Application remains accurate. An original and six (6) copies of this letter are Except as clarified through this filing, all other information in the above-

Respectfully submitted,

Jun 6

Catherine Wang Troy F. Tanner *Counsel for Broadview Networks Holdings, Inc.* 

cc:

Jodie May (FCC) Alex Johns (FCC) David Krech (FCC) Susan O'Connell (FCC)

A/72346971.1