BINGHAM

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

LEGAL INSIGHT. BUSINESS INSTINCT.

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

December 11, 2007

## Via ECFS and Courier

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

Re: IB File Nos. ITC-T/C-20071001-00398, ITC-T/C-20071001-00399, ITC-T/C-20071001-00400, ITC-T/C-20071001-00401, SUPPLEMENT to the Application of MCG Capital Corporation and ITC-T/C-20071001-00402, ITC-T/C-20071001-00403 WC Docket No. 07-224

to Section 214 of the Communications Act of 1934 to Complete a **Broadview Networks Holdings, Inc. for Grant of Authority Pursuant Transfer of Control** 

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. Applicants do not plan to conduct a 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 with the Securities Exchange Commission to conduct an initial public offering of to advise the Commission that on November 30, 2007, Broadview Holdings filed an S-1 update their pending transfer of control applications in the above-referenced proceedings and TruCom Corporation (collectively, "Applicants"), through their undersigned counsel 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

Orange County

Los Angeles

New York

Hong Kong

London

Hartford

Boston

Silicon Valley

Santa Monica San Francisco

Walnut Creek

Tokyo

Washington

202.373.6000 202.373.6001 bingham:com

Bingham McCutchen LLP

2020 K Street NW

Washington, DC

20006-1806

A/72346971.1

O PY

FILED/ACCEPTED DEC 1 1 2007

Federal Communications Commission Office of the Secretary

RECEIVED

Policy Division International Bureau

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

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

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 enclosed for filing with the International Bureau. A copy of this letter is also being filed 373-6560. 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,

win 2

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

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

cc:

Bingham McCutchen LLP bingham.com

A/72346971.1