

Capital Growth Acquisition, Inc.

Re: ITC-Tc-20081117-00501

Granted 19 2008

Policy Division
International Bureau

November 14, 2008
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Vanco Direct USA, LLC, Licensee*
Vanco plc (in administration), Transferor
Capital Growth Acquisition, Inc., Transferee
Request for Special Temporary Authority

Dear Ms. Dortch:

Vanco plc (in administration) ("Vanco plc"), Vanco Direct USA, LLC ("Vanco USA" or "Licensee" and, together with Vanco plc, "Transferors"), and Capital Growth Acquisition, Inc. ("Capital Growth" or "Transferee" and together with Transferors, the "Applicants"), through their respective undersigned counsel and pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.24, respectfully request expedited Special Temporary Authority ("STA") for the transfer of control of Vanco USA, a non-dominant carrier holding authority from the Commission to provide telecommunications services, to Capital Growth, a U.S. company that is not a foreign carrier or affiliated with a foreign carrier and does not have any direct or indirect foreign owners holding an ownership interest of more than 10 percent. Applicants respectfully request that the Commission grant this STA request as soon as possible, and not later than November 19, 2008, so that Vanco USA can assure that telecommunications services to its customers will continue uninterrupted.

As detailed in the underlying application filed concurrently herewith and attached hereto (the "Application"), Vanco USA holds international Section 214 authority to provide both facilities-based and resale international communications services (ITC-214-20050331-00136 and ITC-214-19990811-00546) and provides domestic interexchange services pursuant to blanket domestic Section 214 authority under Section 63.01(a) of the Commission's Rules, 47 C.F.R. § 63.01(a).

Vanco USA is a leading U.S.-based virtual network operator that offers carrier- and technology-neutral telecommunications services through strategic relationships with hundreds of carriers and proprietary information resources. Vanco plc, the direct parent of Vanco USA, is now the subject of administration proceedings in the United Kingdom in which an administrator has been appointed to manage the company's affairs, business, and property for the benefit of its creditors (similar to a bankruptcy trustee in the United States). Vanco plc is in default of its credit arrangements and cannot draw any further on its bank credit facility. The administrator of Vanco plc has approved Capital Growth's acquisition of Vanco USA, and in light of the distressed state of the company, the parties

date: Expire: Jan. 19, 2009

authorized by: Chief, Policy Div, IB

James L. B. B.

Signature

Applicants acknowledge the cand that the STA as stated in p2 of the application

MODE = MEMORY TRANSMISSION

START=NOV-19 15:24

END=NOV-19 15:25

FILE NO. =858

-INTERNATIONAL BUREAU -

STN NO.	COMM. ABBR NO.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK		97301301#93736482#	002/002	00:00:59

*****-INTL BUREAU - ***** 202 418 2824- *****



PD

INTERNATIONAL BUREAU

Policy Division

FAX SHEET

Fax Number: (202) 418-2824

This facsimile transmission is intended only for the addressee shown below. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination or use of this transmission or its contents by persons other than the addressee is strictly prohibited. If you have received this transmission in error, please notify us immediately by telephone and mail the original to us at the Federal Communications Commission, International Bureau, 445 12th Street S.W., Room 74633, Washington, DC 20554.

DATE: 11/19/2008

FROM: George /SI

TELEPHONE NUMBER: (202) 418-4462

TO: John Nakafuta, ESSB. Joan Kiddoo, ESSB.

FAX NUMBER: (202) 930-1301 (202) 373-6482

TELEPHONE NUMBER: 930-1320 373-6034

SPECIAL INSTRUCTIONS: Mc-GTA-2081117-00503, Vance/Capitol Summit
Re 100-76-2008114-00501