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November 19, 2008

FILED/ACCEPTED

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

Federal Communications Commission Office of the Secretary

Re: Joint Application of Vanco plc (in administration) and Vanco Direct USA, LLC, Transferors, and Capital Growth Acquisition, Inc., Transferee, for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission's Rules to Complete a Transfer of Control of an Authorized Domestic and International Section 214 Carrier, File No. ITC-T/C-20081114-00501.

Dear Ms. Dortch:

Vanco plc (in administration) ("Vanco plc"), Vanco Direct USA, LLC ("Vanco USA" and, together with Vanco plc, "Transferors"), and Capital Growth Acquisition, Inc. ("Capital Growth" or "Transferee" and, together with Transferors, the "Applicants") hereby amend the above-captioned application in the following respects.

First, Applicants request that the reference to Vanco USA holding authorization to provide global facilities-based and resale services pursuant to File No. ITC-214-19990811-00546 be deleted from the above-captioned pending application. Vanco USA is not authorized pursuant to File No. ITC-214-19990811-00546. Rather, Vanco USA is authorized to provide global facilities-based and resale services pursuant to authority granted in File No. ITC-214-20050331-00136, as described in the pending above-captioned application.

Second, Vanco plc and Vanco USA request that their request for acceptance of late-filed notice of an involuntary transfer of control and of a pro forma transfer of control be withdrawn from the above-captioned pending application for a transfer of control of Vanco USA from Vanco plc to Capital Growth. As requested by Commission staff, Vanco plc and Vanco USA will file a separate notification of an involuntary transfer of control and of a pro forma transfer of control, which notification will supersede such request made in the above-captioned application.

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Should you have any questions or require further information, please do not hesitate to contact us.

Respectfully submitted,

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