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July 13, 2017

VIA ECFS & IBFS

Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: WC Docket No. 17-176

IB File No. ITC-T/C-20170626-00116

Applications Filed for Consent to the Proposed Transfer of Control of GC Pivotal, LLC to
GTT Americas, LLC

SUPPLEMENT

Dear Secretary Dortch:

By this letter, GTT Americas, LLC ("Transferee"), Pivotal Global Capacity, LLC ("Transferor"), and GC Pivotal, LLC d/b/a Global Capacity ("Global Capacity") (collectively, the "Applicants") supplement the Applications with information and clarification requested by Wireline Competition Bureau Staff. First, Transferee clarifies that its affiliate, Hibernia Atlantic U.S., LLC ("HB Atlantic"), is a Washington limited liability company. Transferee also clarifies that none of GTT Communications, Inc., Universal Telecommunications, Inc. or Brian Thompson holds a 10% or greater, direct or indirect, interest in any U.S. Telecommunications Carrier other than Transferee and HB Atlantic.

Transferee and HB Atlantic manage a leased fiber network within the United States. Similarly, Global Capacity also leases its U.S. fiber network. None of these companies owns its own fiber within the United States.

In addition to the foreign carriers listed on page 6 of the Application, Transferee is also affiliated with the following non-dominant foreign carrier: Perseus do Brasil Servicos de Tecnologia da Informacao Ltda, a Brazilian entity which operates in Brazil.

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Please do not hesitate to contact us with any additional questions.

Respectfully submitted,

/s/ Brett P. Ferenchak

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Counsel for GTT Americas, LLC

Cc: Gregory Kwan (FCC, Wireline Competition Bureau)
Katherine K. Mudge (Counsel for Transferor and Global Capacity)