

November 18, 2020

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington D.C. 20554

*Re: Consolidated Application for the Section 214 Transfer of Control of Clarity  
Telecom, LLC from Python Holdings, L.P. to GI DI Rushmore TopCo LLC, IBFS  
File No. ITC-T/C-20201109-00188, WCB Docket No. 20-371.*

Dear Ms. Dortch:

Through undersigned counsel, applicant GI DI Rushmore TopCo LLC (“Rushmore TopCo” or “Transferee”) supplements the above-referenced application to transfer control of Clarity Telecom, LLC (“Clarity”) from Python Holdings, L.P. to Rushmore TopCo (“Application”), as follows:

1. Transferee states that the only beneficiaries of the Magnuson Living Trust are: Richard Magnuson, Allison Magnuson, Taylor Magnuson, and Scott Magnuson, who are all U.S. citizens.
2. Transferee states that other than what is disclosed in the Application, to the best of its knowledge, no upstream entity in the ownership chain above Rushmore TopCo identified in Exhibit C of the Application holds a 10% or greater interest in any provider of domestic telecommunications services.

Please contact me if you have any questions regarding the information provided above.

Yours sincerely,

/s/ Henry Shi

John T. Nakahata

Henry Shi

Harris, Wiltshire & Grannis LLP

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