

Russell M. Blau  
Jeffrey R. Strenkowski  
Phone: 202.373.6000  
Fax: 202.373.6001  
russell.blau@bingham.com  
jeffrey.strenkowski@bingham.com

October 3, 2014

**Via Electronic Filing**

Steven King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive, S.W.  
Olympia, WA 98504

**Re: GC Pivotal, LLC d/b/a Global Capacity  
Registration and Request for Competitive Classification  
SUPPLEMENT**

Dear Mr. King:

By letter dated September 23, 2014, GC Pivotal, LLC d/b/a Global Capacity (“Global Capacity”), filed a completed Telecom Registration and Request for Competitive Classification Form. This letter clarifies Global Capacity’s intent. Global Capacity previously registered with the Washington Utilities and Transportation Commission (“Commission”) as a data services provider. Global Capacity now seeks to expand its registration in order to provide resold and facilities-based local exchange and interexchange telecommunications services within the State of Washington.

This request to expand its authority is being filed as part of a larger transaction whereby Global Capacity intends to obtain certain network assets and data service customers from MegaPath Corporation (“MegaPath”).<sup>1</sup> Global Capacity intends to provide services to those customers under the same rates, terms and conditions as they are currently provided by MegaPath. Consistent with the services provided by MegaPath, Global Capacity does not intend to provide voice services at this time. In order to serve those customers, Global Capacity is hereby requesting facilities-based and resold authority. Any future changes in the rates, terms or conditions of services provided to affected customers will be undertaken pursuant to their service contracts and/or applicable federal and state tariffing requirements. Applicant will initially provide local

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Bingham McCutchen LLP  
2020 K Street NW  
Washington, DC  
20006-1806

T +1.202.373.6000  
F +1.202.373.6001  
bingham.com

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<sup>1</sup> Global Capacity requests that the filing made by correspondence dated September 24, 2014 with respect to the transfer of assets from MegaPath to Global Capacity be associated with this Request to Expand its Registration.

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October 3, 2014  
Page 2 of 2

exchange services using the same methods as those used by MegaPath in Washington State.

Please acknowledge receipt and acceptance of this filing. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Russell M. Blau" and "Jeffrey R. Strenkowski".

Russell M. Blau  
Jeffrey R. Strenkowski

Counsel for GC Pivotal, LLC