

TENNESSEE REGULATORY AUTHORITY



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460 James Robertson Parkway
Nashville, Tennessee 37243-0505

April 13, 2011

Lance J.M. Steinhart, Counsel
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, GA 30005

RE: Docket 11-00033: Joint Application for Approval for Vanco Direct USA, LLC to Transfer Assets to GC Pivotal, LLC and to Transfer Certificate of Public Convenience and Necessity Issued to Vanco Direct USA, LLC to GC Pivotal, LLC

Dear Mr. Steinhart:

In order to review the above-referenced *Joint Application*, the Tennessee Regulatory Authority ("TRA" or "Authority") requires additional information. Please provide the information requested below by April 20, 2011, and refer to this correspondence as Data Request No. 1 in the response.

1. Have the applicants made a similar filing with the FCC? If so, list any action taken and the associated docket number. If a schedule to complete the review of the filing has been established by the FCC, provide such with your response.
2. Provide the number of customers that Vanco Direct USA, LLC ("Vanco") currently serves in Tennessee.
3. Provide a copy of the self-certification letter filed with the FCC in CC Docket No. 00-257 regarding customer transfers.
4. Will all Vanco customers in Tennessee be transferred to GC Pivotal, LLC ("Pivotal")?
5. Will Vanco cease to exist or will it continue to operate after its certification is transferred to Pivotal?
6. Provide a copy of the customer notification letter that includes language reflecting TRA Rule 1220-4-2-.56(2)(d)(3) indicating that the acquiring provider will pay any fees charged to the customer associated with changing service to the acquiring provider. Also, include language reflecting TRA Rule 1220-4-2-.56(2)(d)(4) that requires 30 day notice of any price increase that may impact the customer up to 90 days after the transfer.

7. Provide a summary of terms and condition of debtor in possession financing described in the *Joint Application*? Will the assets of Pivotal be pledged as security for the indebtedness? Will Pivotal act as a guarantor for the indebtedness?
8. Provide a \$20,000 corporate surety bond, irrevocable letter of credit or sufficient documentation to demonstrate compliance with T.C.A. § 65-4-125 for Pivotal.

If you have any questions or need further assistance, please call Carlos Black at 615-741-2904, ext. 196 or e-mail him at Carlos.Black@tn.gov Please respond by sending the original and 13 copies either by U.S. Mail or express mail. Alternatively, you may send the original and four (4) copies along with an electronic file to:

Ms. Sharla Dillon, Docket Room Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
Email: Sharla.Dillon@tn.gov

Sincerely,



Jerry Kettles, Chief
Economic Analysis & Policy Division