

Telephone: (770) 232-9200  
Facsimile: (770) 232-9208  
Email: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

May 10, 2011

**VIA ELECTRONICALLY &  
VIA OVERNIGHT DELIVERY**

Honorable Freeman, Chairman  
Attn: Sharla Dillon, Dockets  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-9021  
(615) 741-3939

filed electronically in docket office on 05/10/11

Re: Vanco Direct USA, LLC and GC Pivotal, LLC  
Docket No. 11-00033

Dear Ms. Dillon:

Please accept this original letter and four (4) copies that V [REDACTED]  
 ("Vance") and GC Pivotal, LLC [REDACTED]  
 [REDACTED]  
 [REDACTED] SA,  
 LLC to GC Pivotal, LLC. This filing has also been sent via e-mail to [sharla.dillon@state.tn.us](mailto:sharla.dillon@state.tn.us) on  
 May 10, 2011.

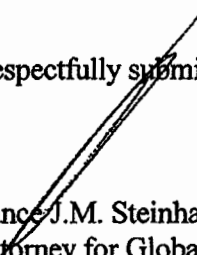
This letter is being submitted since Vanco has notified the TRA of its intent to operate pursuant to market regulation, in accordance with amended T.C.A. § 65-5-109 enacted May 21, 2009. Since Vanco is now subject to market regulation, approval of the proposed transaction described in the above-referenced docket is not required by the TRA. We also respectfully request that you accept the filings made in the above-referenced docket as notice of the proposed transaction described therein, which will satisfy any TRA requirements regarding the same. Please note that GC Pivotal filed its original bond with the TRA on April 13, 2011.

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I have also enclosed an extra copy of this letter to be date-stamped and returned to me in the enclosed preaddressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for Global Capacity Group, Inc.  
Vanco Direct USA, LLC and  
Global Capacity Holdco, LLC

cc: Mr. Dan Kardatzke  
Thomas H. Campbell, Esq.  
Mr. Richard Garner  
Mr. Jerry Kettles