

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE TENNESSEE**

IN RE:)	
)	
COMPLAINT AND PETITION AGAINST)	
GC PIVOTAL, LLC FOR ALLEGED)	
VIOLATIONS OF THE STATUTES AND)	DOCKET NO. 24-00058
RULES REGULATING SMALL AND)	
MINORITY-OWNED)	
TELECOMMUNICATIONS BUSINESS)	
PARTICIPATION PLANS)	

**REQUEST TO WITHDRAW COMPLAINT AND
PETITION TO CONVENE A SHOW CAUSE PROCEEDING**

Comes now the Tennessee Public Utility Commission (“TPUC” or “Commission”) Staff as a party (“Party Staff” or “Petitioner”), by and through the undersigned counsel, and requests that the Administrative Judge permit Party Staff to withdraw its *Complaint and Petition to Convene a Show Cause Proceeding* (“*Petition*”) and close the docket in this matter concerning GC Pivotal, LLC (“GCP” or “Company”). As grounds for this request, Party Staff would state as follows:

Subsequent to the filing of the *Petition*, GCP contacted Party Staff concerning the Company’s small and minority-owned telecommunications business plan (“SMBP Plan”). The Company provided additional contact information for future inquiries regarding the SMBP Plan. On September 25, 2024, GCP submitted correspondence indicating no material changes to the SMBP Plan that the Company filed with the Commission. A copy of the letter is attached as Exhibit 1. Party Staff asserts that this correspondence complies with the annual filing requirement concerning the SMBP Plan as required by Tenn. Code Ann. § 65-5-112 and that GCP is in compliance with statutory requirements concerning SMBP Plan filings.

For the foregoing reasons, Party Staff respectfully requests that the Administrative Judge issue an Order granting the withdrawal of its *Petition* and closing this docket.

Respectfully submitted,



Aaron J. Conklin, #018597
Counsel for Commission Staff
502 Deaderick Street, 4th Floor
Nashville, TN 37243
(615) 770-6896
Aaron.conklin@tn.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was serve via electronic mail upon GCP via Orvin Moore (orvin.moore@claconnect.com), the Company's regulation email address (regulation@gtt.net) and Company Representative Lucy Malcom, (lucy.malcolm@gtt.net), this the 26th day of September, 2024.



Aaron J. Conklin, TPUC Senior Counsel

EXHIBIT 1



CliftonLarsonAllen LLP

3575 Piedmont Road NE, Bldg 15, Suite 1550
Atlanta, GA 30305

phone 404-262-3300 **fax** 404-262-3271
CLAconnect.com

September 23, 2024

Tennessee Public Utility Commission
Attn: Carlos Black
502 Deaderick Street, 4th Floor
Nashville, TN 37243
Carlos.black@tn.gov

Dear Mr. Black,

Re: GC Pivotal, LLC Business Participation Plan Update
Company ID: 129181
Docket No. 24-00058

Please let this letter serve as GC Pivotal's annual update of its SMBP plan for 2024 as required by the Commission. Note that there are no material changes to GC Pivotal, LLC's existing Small and Minority-owned Telecommunications Business Participation Plan ("SMBP Plan") on file with the TRA. Should you have any follow up questions please feel free to contact me.

Sincerely,

CliftonLarsonAllen LLP

Orvin Moore
Attorney-in-Fact
678-203-0271
Orvin.moore@claconnect.com

Enclosure