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May 9, 2011

VIA OVERNIGHT DELIVERY AND
VIA EMAIL TO
pgenung@azcc.gov

Pamela Genung- Staff Analyst
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007
(602) 542-0664



Re: GC Pivotal, LLC
Docket No. T-20787A-11-0095

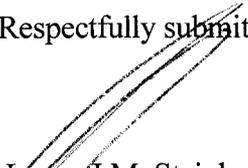
Dear Sir/Madam:

Enclosed please find for filing an original and thirteen (13) copies GC Pivotal, LLC's responses to the Commission's request for information in GC Pivotal, LLC's Application and Petition for Certificate of Public Convenience and Necessity to Provide Competitive Intrastate Telecommunications.

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

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

Respectfully submitted,


Lance J.M. Steinhart
Attorney for GC Pivotal, LLC

ec: Mr. Dan Kardatzke
Thomas H. Campbell, Esq.
Mr. Richard Garner
Michael W. Patten, Esq.
Kimberly Ruht, Esq.

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AZCC CORP COMMISSION
DOCKET CONTROL

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
GC PIVOTAL, LLC ("GC PIVOTAL")
Docket No. T-20787A-11-0095
May 9, 2011**

PJG 1.1 Please indicate the date when GC Pivotal was formed.

RESPONSE: GC Pivotal was formed May 20, 2010.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
GC PIVOTAL, LLC ("GC PIVOTAL")
Docket No. T-20787A-11-0095
May 9, 2011**

PJG 1.2 Please indicate how long GC Pivotal has been in operation.

RESPONSE: GC Pivotal was formed to purchase the assets of two bankrupt companies, as indicated in the bankruptcy order approving the sale filed with the original application as Exhibit E. GC Pivotal will not operate in any state until the bankruptcy sale closes and the company has obtained authorization to provide telecom services.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
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Telephone Number: (602) 956-7200

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May 9, 2011**

PJG 1.3 Please indicate whether GC Pivotal has any affiliates in Arizona offering telecommunications services.

RESPONSE: GC Pivotal has no affiliates in Arizona offering telecommunication services.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

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PJG 1.4 In its Application at item (A-I), GC Pivotal is requesting private line authority in Arizona. In GC Pivotal's proposed Arizona Tariff No. I attached to the Application, Original Page I states "Arizona Interexchange and Local Exchange Telecommunications Tariff" and continues with a paragraph referring to "provisions of local exchange telecommunications services". Original Page 5 in the above-mentioned proposed Tariff identifies "the provision of interexchange intrastate telecommunications services, and dedicated, non-switched local exchange private line telecommunications services". The two proposed tariff pages do not reflect the authority that GC Pivotal is requesting in its Application at (A-I). Please provide an amended page to the Application indicating the correct services that GC Pivotal is requesting authority or provide proposed replacement tariff pages.

RESPONSE: Please see attached Exhibit "A".

All Contacts Providing Information/Response for the above question:

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Telephone Number: (602) 956-7200

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PJG 1.5 In its Application at item (A-8), GC Pivotal indicated that the corporate officers and management team of Global Capacity Group, Inc. ("GCG") and Global Capacity Direct, LLC ("GCD") are expected to remain essentially the same immediately following the Proposed Transaction. Please identify the names of those individuals comprising the corporate officers and management team that will be responsible for the day-to-day operations of GC Pivotal in Arizona. Please also include biographical information and the number of years of telecommunications experience of each individual.

RESPONSE:

The names of the individuals who are the current officers of GC Pivotal are as follows:

Francis Najafi – President

Richard Garner – Treasurer

Please see original application's Exhibit "A" for biographical information.

The members of the officers and management team of GCG and GCD that are expected to be retained by GC Pivotal who will be responsible for the day to day telecom operations of GC Pivotal in Arizona are as follows:

Patrick Shutt

Dan Kardatzke

Jack Lodge

Please see Exhibit B which is attached hereto for biographical information.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
GC PIVOTAL, LLC ("GC PIVOTAL")
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May 9, 2011**

PJG 1.6 Please indicate the number of pre-transaction employees of GC Pivotal.

RESPONSE: No pre-transaction employees.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

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May 9, 2011**

PJG 1.7 Please indicate the number of post-transaction employees of GC Pivotal.

RESPONSE: Estimated to be approximately 75.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
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Docket No. T-20787A-11-0095
May 9, 2011**

PJG 1.8 Please describe GC Pivotal's plan for providing customer service to its customers in Arizona.

RESPONSE: Pivotal expects to retain the technical and customer service staff of GCG and GCD, who will be available to respond to inquiries regarding service, installation and repair requests. Customer service representatives will consider each case and provide the most equitable solution available. If the customer is not satisfied, they may write to the company for reconsideration. Trained field technicians who work on an independent contractor basis handle requests for installation and repair.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

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Docket No. T-20787A-11-0095
May 9, 2011**

PJG 1.9 Does GC Pivotal plan to have a customer service center in Arizona?

RESPONSE: No, not immediately. All customer service inquiries will be handled through a toll free number that connects to our customer care center.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

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STAFF'S FIRST SET OF DATA REQUESTS TO
GC PIVOTAL, LLC ("GC PIVOTAL")
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May 9, 2011**

PJG 1.19 Please identify all other states/jurisdictions in which the Company or an affiliate provides telecommunications services. Please specify, in the attached matrix format, the tariff rates and charges that the Company and/or affiliate charges for telecommunications services in these other jurisdictions. If there is a difference between the tariff rates and charges that the Company will charge in Arizona and the tariff rates and charges that the Company and/or affiliate charges in other jurisdictions for telecommunications services, please explain why you are charging different tariff rates and charges in Arizona. The material you provide should enable Staff to determine whether these tariff rates and charges are comparable to the tariff rates and charges charged in other jurisdictions. If this information has already been provided in an earlier data response, please specify as such. *(See Attachments C & D - By State) (For the Applicant's ease, an excel file can be provided by contacting Pamela Genung at pgenung@azcc.gov)*

RESPONSE: GC Pivotal does not currently provide telecommunications services in any state. The Company will not provide residential or voice services, but will provide resold data services only to business customers pursuant to individual contracts. GC Pivotal has no market power and that the reasonableness of its rates will be evaluated in a market with numerous competitors.

All Contacts Providing Information/Response for the above question:

Richard Garner, Secretary and Treasurer
3200 East Camelback Road, Suite 295, Phoenix, Arizona 85018
E-Mail: rgarner@pivotalgroup.com
Telephone Number: (602) 956-7200

EXHIBIT "A"

Tariff Replacement Pages

Lance J.M. Steinhart, P.C.

1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005

Also Admitted in New York
and Maryland

Telephone:(770) 232-9200
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May 6, 2011

VIA OVERNIGHT DELIVERY

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007
(602) 542-2237

Re: GC Pivotal, LLC
Docket No. T-20787A-11-0095

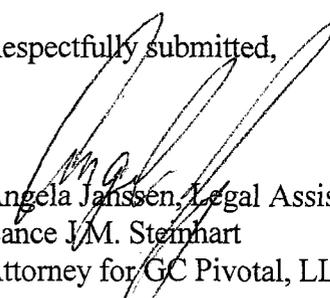
Dear Sir/Madam:

Pursuant to staff request, enclosed please find for filing an original and thirteen (13) copies of GC Pivotal, LLC's replacement Tariff No. 1, Pages 1 and 5.

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

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

Respectfully submitted,


Angela Janssen, Legal Assistant to
Lance J.M. Steinhart
Attorney for GC Pivotal, LLC

**ARIZONA PRIVATE LINE
TELECOMMUNICATIONS TARIFF**

OF

GC Pivotal, LLC

This tariff contains the descriptions, regulations, and rates applicable to the provisions of private line telecommunications services provided by GC Pivotal, LLC with principal offices at 200 South Wacker Drive, Suite 1650, Chicago, Illinois 60606 for series furnished within the State of Arizona. This Tariff is on file with the Arizona Corporation Commission and copies may be inspected during normal business hours, at the Company's principal place of business.

Issued: February 28, 2011
Issued by:

Richard Garner, Secretary and Treasurer
GC Pivotal, LLC
200 South Wacker Drive, Suite 1650
Chicago, Illinois 60606

Effective:

2. APPLICATION OF TARIFF

The service rates and regulations set forth in this Tariff are for the provision of private line telecommunications services for Customers of GC Pivotal, LLC ("Company").

The Company may, from time to time, engage in special promotional offerings designed to attract new Customers or to promote existing services. Such promotional service offerings shall be subject to specific dates, times, and/or locations, and shall be subject to prior notification to the Commission.

EXHIBIT "B"

Biographical Information

Management of Global Capacity Group, Inc. and Global Capacity Direct, LLC

Patrick C. Shutt
Chief Executive Officer

Patrick C. Shutt is the CEO and Director of Global Capacity. Prior to Global Capacity, Shutt was the co-founder, Director and CEO of 20/20 Technologies, Inc. and Director and CEO of Magenta net-Logic, Ltd., a global information services and consulting company focusing on the telecommunications industry and co-headquartered in the United States and the United Kingdom. Shutt has nearly two decades of experience in the information services and telecommunications industry, including serving as a Co-Founder, Director, Chairman, Chief Executive Officer and President at Universal Access from 1997 to November 2002. He began his career from 1989 to 1992 with Sprint Communications and the global telecommunications company Cable and Wireless PLC from 1992 to 1994. Shutt then moved to Teleport Communications Group (TCG) from 1994 to 1996. In late 1996, Mr. Shutt led a TCG spin out start up organization named Arista Communications until September of 1997.

In October of 1997, Shutt co-founded Universal Access. Under his leadership the company grew organically from \$0 revenues to \$144M run rate in four years. In addition, Shutt led the company through its Initial Public Offering with Goldman Sachs as the lead underwriter in March of 2000 with an initial market capitalization of over \$3.0 Billion. Mr. Shutt completed five tranches of private equity capital and one round of public capital during his tenure with Universal Access totaling over \$240M. Under Shutt's leadership Universal Access received the 2002 Deloitte and Touche Fast 500 Award as the fifth fastest growing company in the US with a growth rate of over 158,000% between 1997 and 2001. Shutt departed Universal Access in November 2002. In December 2002, Shutt co-founded 20/20 Technologies, Inc., the firm that acquired Magenta-netLogic. Shutt's board experience includes serving as a Section 16 Officer and Director of two US public companies, as well as Director of two private companies. Since 2003 he has divided his time between the United States and European markets.

Shutt holds a B.A from Wagner College and a M.B.A from Wagner College. Shutt played soccer at a high level both in the UK and the USA in the US Junior Olympic Development program. Mr. Shutt is a US Landed Immigrant and a British citizen, and currently lives in Chicago with his family.

Jack Lodge
Chief Operating Officer

Jack Lodge is the Chief Operating Officer at Global Capacity, responsible for all aspects of marketing, operations, information technology, software development, and solutions delivery for the Company. He has over 19 years experience in information technology and telecommunications. Lodge joined Global Capacity in 2006 upon its acquisition of CentrePath, Inc., a privately held remote network management company where he served as General Manager, with responsibility for all aspects of CentrePath's managed services business. Prior to joining CentrePath, Mr. Lodge held several leadership positions in the IT organization at Nortel Networks, where his responsibilities included network architecture and strategy. Lodge joined Nortel via the 1998 acquisition of Bay Networks, where he held a number of IT management positions. Prior to Bay Networks, Mr. Lodge owned and operated a regional network services and maintenance business, distributing and supporting technology from multiple manufacturers. He began his career with AT&T in 1989 in a sales role. Lodge holds a BA from the College of the Holy Cross, and an MBA from Northeastern University.

Dan Kardatzke

Dan Kardatzke (37) is the Chief Financial Officer and Executive Vice President of Corporate Development for Global Capacity, an international telecommunications logistics provider. In this role, Mr. Kardatzke is responsible for all aspects of finance & accounting, mergers & acquisitions, financial modeling & analysis, customer and partner contractual risk analysis and human resources. Prior to this current position, Mr. Kardatzke was the Co-founder, President and COO of SageTV, LLC, a pioneer in the Personal Video Recording (PVR) and Media Center software space. He has more than fifteen years of experience in technology and services industries, including serving as the Director of Planning & Analysis for Frankel, a brand marketing agency owned by the Publicis Groupe from January 2001 through September 2001 and a Director of Finance & Operations, at MarketForward, a marketing technology solutions provider also owned by Publicis from October 2001 through March 2002. In addition to other financial planning and analysis roles at Frankel from October 1997 through December 2000 he began his career from May 1995 to August 1997 with the Treasurer and Business Development Manager role at the non-profit group of Chicago Research & Planning, a consortium of technology executives from the Fortune 2000.

Prior to joining Global Capacity in his current full-time role in February of 2007, Mr. Kardatzke was contracting his services through his consulting company CRK & Associates, LLC where he worked as the CFO for 20/20 Technologies (acquired by Global Capacity in September of 2006), the interim CFO for a medical staffing company in Lombard, IL and played a Business Development role for Capital Growth Systems (CGSY) before the consolidation with 20/20 into Global Capacity. In these roles Mr. Kardatzke was responsible for Mergers & Acquisitions, Financial Planning, Business Development and Corporate Finance. He has been critical in assisting these clients with growing their businesses through organic and in-organic growth as they expand their regional, international and service base to other industries.

In April of 2002 Mr. Kardatzke co-founded SageTV, LLC. Under his leadership as CEO the company took an early stage software product for the PC to consumer launch in less than 12 months and has since been a pioneer in the PVR and Media Center industry expanding beyond the Windows platform into Linux, Macintosh and other thin-client set-top devices. Mr. Kardatzke was responsible for building up a number of key relationships in the hardware and software provider space to compliment the technology of SageTV until the hiring of the current CEO when he assumed the role of President & COO. In addition, Mr. Kardatzke was responsible for leading the multiple rounds of fund raising with its Angel investor during 2004-2006.

Mr. Kardatzke holds a B.S. in Corporate Finance from the University of Illinois in Champaign, IL. He currently resides in the western suburbs of Chicago with his wife and two young children and has a passion for cycling and mountain biking.

Contact Information

Dan Kardatzke
200 S Wacker Drive, Suite 1650
Chicago, IL 60606
Office: 312-881-4954
Mobile: 630-460-2935
dkardatzke@globalcapacity.com