

In the Matter of )  
Section 63.71 Application of )  
GC Pivotal, LLC )

GC Pivotal, LLC d/b/a Global Capacity (“Global Capacity”), a wholly-owned subsidiary of GTT Americas, LLC, hereby provides notice pursuant to Section 241(a) of the Communication Act of 1934, as amended (the “Act”), 47 U.S.C §214, and Section 63.71 of the Commission’s Rules, 47 C.F.R. §63.71 of its intention to discontinue its provision of domestic telecommunications services – namely, interstate high speed data and Internet Services – to a *limited* portion of its customers in New York and Massachusetts.

In effort to maintain its nationwide broadband network in the most efficient manner possible, Global Capacity has identified 3 central offices in its network of 1,750 central offices that will be shut down. These 3 offices have been stagnant in growth and revenue for some time. The identified central offices support 10 wholesale partners and 13 wholesale partner end user customers of Global Capacity. A total of 13 circuits provisioned through the wholesale carriers will be affected by the proposed discontinuance. This discontinuance will not result in harm to the affected customers because the customer will have the opportunity to either select another service provider or, for some customers, alternative arrangements offered by Global Capacity for their broadband needs. In the 3 central offices where it plans to discontinue service, Global Capacity competes with both CLECs and ILEC(s) that offer

high speed data and internet access services. Global Capacity provides the following information pursuant to Section 63.71 of the Commission's Rules:

1. *Name and Address of the Carrier.* GC Pivotal, LLC d/b/a Global Capacity's primary business address is 7900 Tysons One Place, Suite 1450, McLean, Virginia 22102.
2. *Date of Planned Service Discontinuance, Reduction or Impairment.* Global Capacity plans to discontinue interstate high-speed data and DSL to the affected customers in a limited number of central offices as early as January 6, 2020 for wholesale customers, or as soon advance contractual notice is provided to affected customers.
3. *Points of Geographic Areas of Service Affected.* Global Capacity proposes to discontinue interstate special access high speed DSL services to customers served by the 3 central offices located in the states of New York and Massachusetts.
4. *Brief Description of the Type of Service Affected.* The services to be discontinued are interstate special access high speed broadband services (*i.e.*, broadband DSL internet access).
5. *Brief Description of the Dates and Methods of Notice to All Affected Customers.* All affected customers are wholesale customers or wholesale partner end user customers. In September 2019, Global Capacity provided written notice to all affected Global Capacity wholesale customers that certain central offices would be shut down on January 6, 2020. Additionally, each wholesale partner received a list of circuits impacted by the planned closures and was encouraged to work with their respective end users to find a new provider for their Internet services. In all cases, Global Capacity provided the affected customers with the name and address, the date of the planned discontinuance, the geographic areas where service will be discontinued, and a brief description of the service to be discontinued.

Global Capacity's notice to the wholesale customers conforms to the requirements of Section 63.71(a) of the Commission's Rules. A copy of the wholesale partner notice is appended hereto as Exhibit A.

6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to be Discontinued Reduced or Impaired. Global Capacity is considered non-dominant with respect to the affected services.

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In accordance with Section 63.71 of the Commission's Rules, a copy of this filing is being mailed to the Governors of New York and Massachusetts and to the Special Assistant for Telecommunications for the Secretary of Defense, concurrently with the filing of this notice.

Additional questions regarding this filing may be addressed to the undersigned.

Respectfully submitted,

GC Pivotal, LLC d/b/a Global Capacity

By: \_\_\_\_\_



Amy Rogers  
Director, Legal  
7900 Tysons One Place, Suite 1450  
McLean, Virginia 22102  
(703) 442-5594

Dated: September 17, 2019

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing filing was served this 17<sup>th</sup> day of September, 2019, by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below.

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Secretary of Defense  
Attn: Special Assistant for Telecommunications  
Pentagon  
Washington, DC 20301

Secretary Massachusetts Department  
Of Telecommunications and Cable  
1000 Washington Street, Suite 820  
Boston, MA 02118-6500

Honorable Charlie Baker  
Governor of Massachusetts  
Office of the Governor  
Room 360  
Boston, MA 02133

Honorable Kathleen H. Burgess  
Secretary to the Commission  
New York State  
Department of Public Service  
Empire State Building, Agency Bldg. 3  
Albany, NY 12223-1350

The Honorable Andrew Cuomo  
Governor of New York  
NYS State Capital Bldg.  
Albany, NY 12224

## EXHBIT A

### Important Notice Regarding Your GTT Services

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[Carrier Client Company name]

[Contact]

[Company address]

[City, state, Zip]

Notification Date: September 6, 2019

Account Number: [CMD ID]

Subject: Discontinuation of Services in Select Central Offices

Dear [contact],

GTT strives to increase its value to its clients and proactively takes steps to ensure performance, scale and an ease of doing business. Unfortunately, occasionally it is necessary for us to discontinue services due to the decommissioning of network facilities that have a low volume of business.

This letter is to inform you that we will be decommissioning a select number of Central Offices (COs) and discontinuing all access services in these COs. Orders for new services in these COs are no longer being accepted. Attached is a list of your circuits that will be affected by the decommissioning of these COs. These circuits will be disconnected as of January 6, 2020 and will need your attention to identify alternative arrangements. Early termination fees will not apply to these circuits.

We apologize for any inconvenience this may cause. Please be assured that your satisfaction is very important to us. GTT is committed to providing you with a robust, reliable nationwide portfolio of data connectivity services. Account Representatives are available to discuss what service alternatives you have with GTT or if you need to seek service from another provider. Contact your Account Representative to answer any questions and for assistance you may need in the transition. It is imperative for you to talk with your Account Representative as soon as possible to determine what service alternatives you may or may not have with GTT. In the event that we cannot provide you with a reasonable substitute service, unfortunately, the circuits will be disconnected as of December 31, 2019.

If you wish to object to GTT's plan to discontinue service in the identified COs, you have the right to file your objections or other comments with the Federal Communications Commission (FCC) in response to its Public Notice announcing the proposed discontinuance. The Public Notice will state the applicable deadline and procedures for filing such comments. The FCC usually will authorize a carrier's request to discontinue unless customers are unable to receive similar services or a reasonable substitute from another provider. You can file your complaint by writing to: Federal Communications Commission, Consumer Inquiries and Complaints Division, 44 12<sup>th</sup> Street, SW, Washington, DC 20554 and include in your comments a reference to the §63.71 application of GC Pivotal, LLC a subsidiary of GTT Communications.

GTT will continue to invest in our network, systems and processes and appreciates the opportunity to add value to your business. If you have any questions regarding the service discontinuation, or need any assistance, please contact your Account Representative at [email address and or phone number].

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Thank you,

Notification Date: September 6, 2019

Account Number: [CMD ID]

Subject: Discontinuation of Services in Select Central Offices

Central Office CLLI	Service City	Service State
BLRCMAAN	BILLERICA	MA
NYCRNYSS	STATEN ISLAND	NY
RYE NYRY	RYE	NY