

April 13, 2007

Via Electronic Filing

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Application of IPC Systems, Inc., Transferee, and WestCom Holding Corp.,
Transferor, For Grant of Authority to Complete a Transfer of Control of WestCom
Corporation and KGM Circuit Solutions, LLC, WC Docket No. 07-77**

Supplemental Information

Dear Ms. Dortch:

IPC Systems, Inc. (“IPC”) and WestCom Holding Corp. (“WHC”) (collectively, the “Applicants”) submit the following supplemental information in the above-captioned proceeding at the request of Commission staff.

First, the Applicants clarify that the above-captioned Application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(i) of the Commission’s Rules, 47 C.F.R. § 63.03(b)(2)(i), because, immediately following the transaction: (1) the Applicants and their affiliates combined will hold less than a ten percent (10%) share of the interstate, interexchange market; (2) the Applicants and their affiliates will provide competitive telephone exchange services or exchange access services (if at all) only in areas served by dominant local exchange carriers (none of which is a party to the proposed transaction); and (3) none of the Applicants or their affiliates is dominant with respect to any service. In fact, at present, neither the Applicants nor any of their affiliates provide competitive local exchange services or exchange access services in any of the areas they serve.

Second, the Applicants confirm that the current ownership of IPC is unchanged from that approved by the Commission in WC Docket No. 06-162, DA 06-1918 (rel. Sept. 25, 2006).

Third, the Applicants correct and clarify the Application with regard to the geographic areas served by WestCom Corporation and KGM Circuit Solutions (“KGM”). WestCom Corporation has telecommunications operations in 45 states.¹ Approximately 94 percent of its U.S. revenues are derived from customers in the following thirteen states (listed in descending order by revenue): New York, Illinois, New Jersey, California, Connecticut, Texas, Maryland,

¹ The Application indicated that WestCom Corporation and KGM together provided service in approximately 30 states. Further research found that these companies derive revenues from more than this number of states, and this letter corrects the information provided in the Application.

