

December 4, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attention: Wireline Competition Bureau

Re: Joint Application of Vanco plc (in administration) and Vanco Direct USA, LLC, Transferors, and Capital Growth Acquisition, Inc., Transferee, for Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as amended, and Sections 63.04 and 63.24 of the Commission's Rules to Complete a Transfer of Control of an Authorized Domestic and International Section 214 Carrier, File Nos. WC Docket No. 08-229, ITC-T/C-20081114-00501.

Dear Ms. Dortch:

Capital Growth Acquisition, Inc. ("Capital Growth" or "Transferee") provides the following information in response to the request of FCC staff in respect of the above-captioned application.

Capital Growth Systems, Inc. is a publicly-traded corporation that delivers telecom logistics solutions to a global client set consisting of systems integrators, telecommunications companies, and enterprise customers. Transferee is a wholly-owned subsidiary of Capital Growth Systems, Inc.

Global Capacity Group, Inc. is also wholly-owned subsidiary of Capital Growth Systems, Inc. Global Capacity Group, Inc. is a corporation organized under the laws of the State of Texas. Global Capacity Group, Inc., working with other operating subsidiaries of Capital Growth Systems, Inc., provides managed network connectivity solutions to enterprises, systems integrators, and telecommunications companies. In connection therewith, Global Capacity Group, Inc. is authorized to provide resold and/or facilities-based local exchange and/or interexchange service in Alabama, Arkansas, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Massachusetts, Michigan, Mississippi, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode

Island, South Dakota, Vermont, Washington, West Virginia, Wisconsin and Wyoming.¹ However, Global Capacity Group, Inc. currently provides local exchange and intrastate interexchange services only in Pennsylvania. Global Capacity Group, Inc. also provides interstate interexchange services.

Should you have any questions or require further information, please do not hesitate to contact us.

Respectfully submitted,



John T. Nakahata
Jonathan B. Mirsky
Counsel for Capital Growth Acquisition, Inc.

¹ Global Capacity Group, Inc. also has a pending application for authorization in Louisiana. In the above-captioned application Transferee inadvertently described Global Capacity Group, Inc. as holding an authorization in Louisiana.

Certificate of Service

I, N'Mah F. Yilla, certify that on this 4th day of December 2008 a copy of the foregoing Letter was sent by first-class mail to the following:

Jean L. Kiddoo, Esq.
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Counsel to Vanco plc (in administration) and Vanco Direct USA, LLC



N'Mah F. Yilla