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September 19, 2019
Via Overnight Delivery

Ms. Rosemary Chiavetta, Commission Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street 2nd Floor
Harrisburg, PA 17120

RE: Application of Access Point, Inc. for Approval of the Abandonment or Discontinuance of Local Exchange and Interexchange Telecommunications Services with the Application of GC Pivotal, LLC to Offer, Render, Furnish or Supply Telecommunications Services

Dear Ms. Chiavetta:

Enclosed for filing please find the original and one (1) copy of the Application for Approval of the Abandonment or Discontinuance of Local Exchange and Interexchange Telecommunications Services submitted on behalf of Access Point Inc. in Docket Nos. A-310557 & A-2009-2133334 as well as the Application of GC Pivotal, LLC to Offer, Render, Furnish or Supply Telecommunications Services.

As result of a transaction completed on October 1, 2018, Access Point became an indirect, wholly-owned subsidiary of GTT Americas ("GTTA"). GTTA is a direct, wholly-owned subsidiary of GTT Communications, Inc. ("GTT"). GTT, through its subsidiaries including GC Pivotal, is a global provider of cloud networking services.

Like Access Point, GC Pivotal, LLC ("GC Pivotal") is a direct, wholly-owned subsidiary of GTTA and an indirect, wholly-owned subsidiary of GTT. GC Pivotal was granted a Certificate of Public Convenience as a Competitive Access Provider in Pennsylvania in Docket No. A-2011-2233262 on August 15, 2011.

In order to provide more effective billing and customer service support to the commercial and enterprise customers that constitute Access Point's former customer base, GTTA determined that Access Point should consolidate into GC Pivotal. As a result, effective January 1, 2019, GC Pivotal became the service provider of record for the customers of Access Point, providing telecommunications services to Access Point's customers under the same rates, terms and conditions as the services previously provided by Access Point.

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As a result of the transactions described above, Access Point, Inc. is no longer providing service directly to customers in Pennsylvania and wishes to relinquish its authority. GC Pivotal is filing an Application with the Commission to expand its existing CAP authority to include authority as an Interexchange Toll Reseller and Competitive Local Exchange Carrier so that it can serve the Access Point customer base under its own CPCs.

Also enclosed with this filing are GC Pivotal's Telephone -Pa. P.U.C. No. 1 (Local Exchange Services) and Telephone-Pa. (Switched Access Services). The Company respectfully requests an effective date of October 20, 2019 for these tariffs.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,



Sharon Thomas
Consultant

cc: Mike Winston - Access Point
Service List
tms: PAX1901

Enclosures
ST/mp