

September 9, 2019
Via Overnight Delivery
& E-Mail

Secretary
Utah Public Service Commission
Heber M. Wells Building
160 East 300 South, Suite 400
Salt Lake City, UT 84111

RE: **Access Point, Inc.**
Amendment to Request for Cancellation
Docket No. 19-2488-01

Dear Sir or Madam:

Please accept the original and two (2) copies of this Amendment to the Request for Cancellation (“Amendment”) submitted on behalf of Access Point, Inc. (“API” or “Company”) in the docket referenced above. API submitted a Request for Cancellation of its Certificate of Public Convenience and Necessity (“CPCN”) on July 31, 2019. This Amendment notifies the Commission of the indirect transfer of ownership of API that occurred on October 1, 2018 and the subsequent consolidation of Access Point into its affiliate, GC Pivotal LLC (“GC Pivotal”).

As result of a transaction, completed on October 1, 2018, by which GTT Americas, LLC (“GTTA”) acquired the stock of Access Point’s direct parent company, Access Point Communications Inc. (“AP Parent”), Access Point became an indirect, wholly-owned subsidiary of GTTA (the “GTT-API Transaction”). GTTA is a Delaware limited liability company and direct, wholly-owned subsidiary of GTT Communications, Inc. (“GTT”), a publicly-traded Delaware corporation (NYSE: GTT). GTT, through its subsidiaries including GC Pivotal, is a global provider of cloud networking services.

Like Access Point, GC Pivotal is a direct, wholly-owned subsidiary of GTTA and an indirect, wholly-owned subsidiary of GTT. GC Pivotal, LLC was issued a Certificate to provide telecommunications services in Utah on April 20, 2011 in Docket No. 11-2539-01. Pre- and post-GTT-API Transaction organizational charts for Access Point and GC Pivotal are provided as Attachment A.

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 (the “Consolidation”). As a result of the *Consolidation*, 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 pursuant to GC Pivotal’s Certificate under the same rates, terms and conditions as the services previously provided by Access Point. The affected customers were not switched to the billing system of GTT (including GC Pivotal) until March 2019 (the “Billing Change”). Access Point’s customers received notice of the change in their provider and billing system prior to the Billing Change. A copy of the customer notice that was provided via bill messages is included as Attachment B.

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Pursuant to Utah Code Ann. § 54-8b-3.4, API notifies the Commission of the transactions described herein and renews its request for cancellation of API's Certificate of Public Convenience and Necessity.

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.

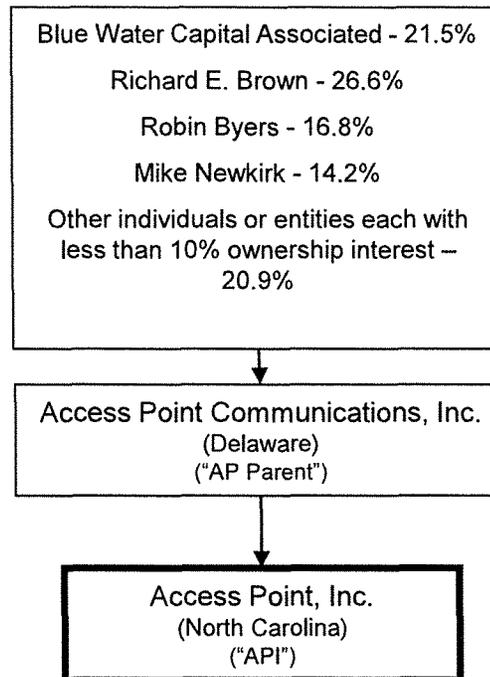
Sincerely,

A handwritten signature in black ink, appearing to read 'S. Thomas', with a large, stylized flourish extending to the right.

Sharon Thomas
Consultant

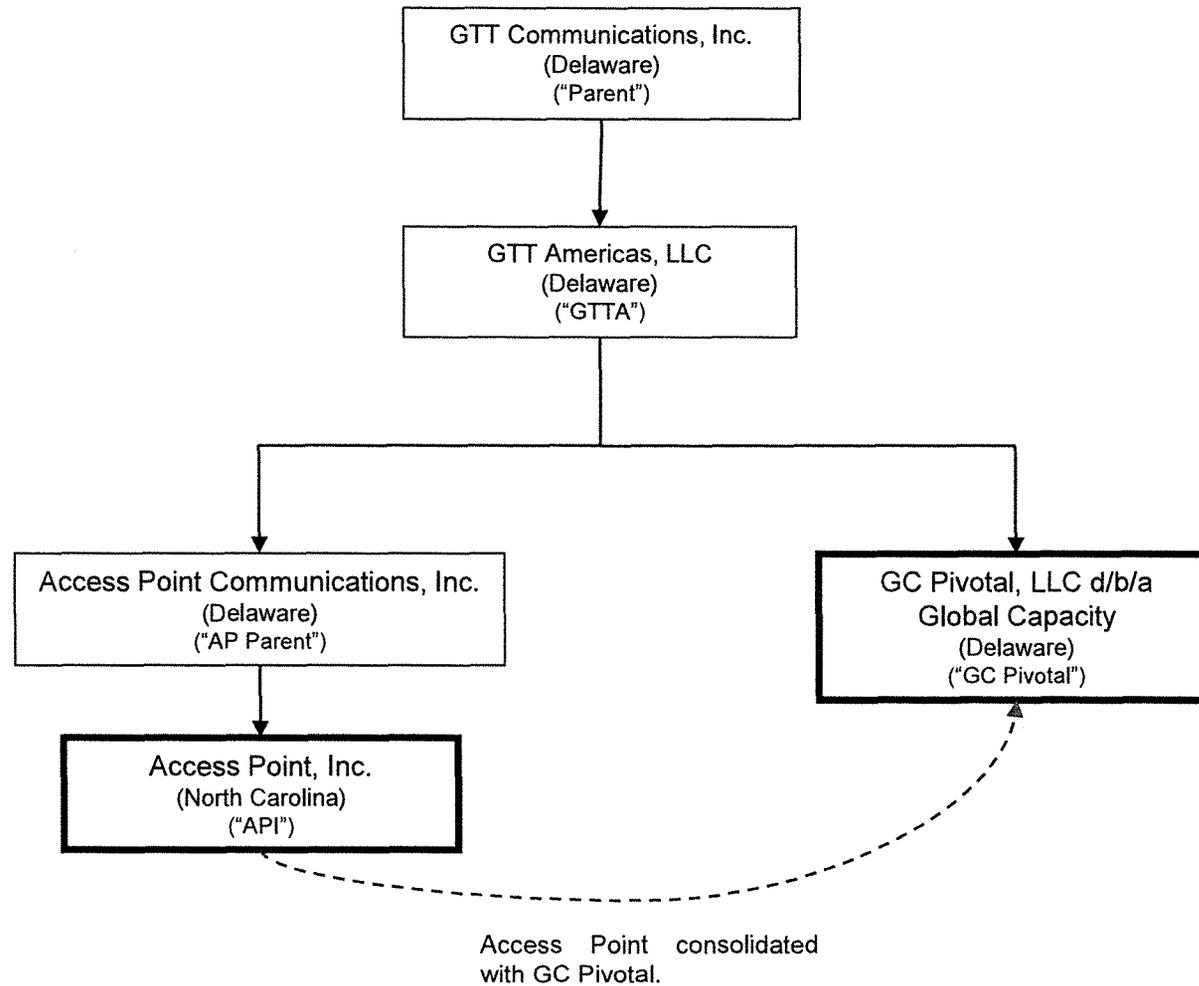
cc: Mike Winston - Access Point
Utah PSC (E-Mail)
tms: UTx1901a

Pre-Transaction Ownership of Access Point, Inc.



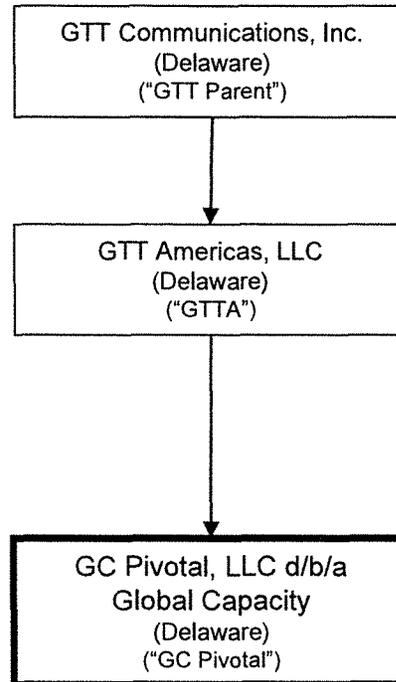
Unless indicated all ownership percentages are 100%.

Post-Transaction Ownership of API and Depiction of Consolidation



Unless indicated all ownership percentages are 100%.

Post-Consolidation Ownership Structure of Global Capacity



Unless indicated all ownership percentages are 100%.

Attachment B - Customer Notice

TO:

CC:

BCC:

MESSAGE:



2019-02-18

Re: 295965

Dear Valued Client,

On 2018-10-01, GTT completed the acquisition of AccessPoint Inc. and all subsidiaries. We are excited to become your new service provider through our subsidiary GC Pivotal, LLC d/b/a Global Capacity beginning January 1, 2019, so that we may connect you globally through our expansive network reach and comprehensive portfolio of cloud networking services. Our services include optical networking, EtherCloud® wide area networking, internet services delivered via our Tier 1 internet backbone, a comprehensive suite of managed services, voice services and video.

As a client of GTT, you have a dedicated account team listed below to serve as your primary contacts for all issues related to your service. In addition, GTT operates several Network Operation Centers around the globe on a 24x7x365 basis to provide support for all of your services.

Contact Name	Title	Email	Phone
GTT SMB	Client Service Center	smb.csc@gtt.net	1-877-874-5846

We have established the following timeline to complete the integration and service your network needs. For billing and maintenance issues, please continue to use your current AccessPoint contact(s) until these milestones are completed.

Milestone	Date	Description
Access to EtherVision	February 2019	Access to GTT online client portal for quote, order, ticket and billing management
Billing Transition	March 2019	First invoice sent from GTT billing systems
NOC Transition	March 2019	Technical support provided by GTT NOC

GTT prides itself on delivering outstanding client service with simplicity, speed and agility. You will find us easy to work with, extremely responsive to your requests and flexible in meeting your specific business needs.

For more information on GTT, please visit our website, www.gtt.net.

We look forward to working with you and thank you for your business.

Sincerely,

GTT Communications, Inc.

SENT ON:

2019-02-18 14:49:31