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April 4, 2019
Via Web Filing

Mr. Michael Dougherty, Executive Director
Oregon Public Utility Commission
201 High Street SE
Suite 100
Salem, OR 97301-3398

RE: Access Point, Inc.
Notice of Transfer of Customer Base and Request for Cancellation

Dear Mr. Dougherty:

Enclosed for filing please find the original Notice of Transfer of Customer Base and Request for Cancellation submitted on behalf of Access Point, Inc.

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,

/s/Sharon Thomas

Sharon Thomas
Consultant

tms: ORx1901

Enclosures
ST/mp

NOTICE OF TRANSFER OF CUSTOMER BASE

AND

REQUEST FOR CANCELLATION

Access Point, Inc. (“API” or “Company”) hereby notifies the Commission that as of January 1, 2019, API no longer provides telecommunications services in Oregon and therefore requests that the Commission cancel its Certificates of Public Convenience and Necessity (“Certificate”) effective December 31, 2018, or the earliest possible date permitted.

I. DESCRIPTION OF THE COMPANY

Access Point, Inc. is a North Carolina corporation with headquarters at 1100 Crescent Green, Suite 109, Cary, NC 27518. The Commission granted API a Certificate to provide telecommunications services in Oregon in Order No. 97-322 on August 20, 1997

As result of a transaction completed on October 1, 2018, the Company is a direct, wholly owned subsidiary of GTT Americas, LLC (“GTTA”). GTTA is a Delaware limited liability company and direct, wholly-owned subsidiary of GTT Communications, Inc. (“GTT”), a publicly-traded Delaware corporation (NYSE: GTT). Both GTTA and GTT are headquartered at 7900 Tysons One Place, Suite 1450, McLean, Virginia 22102. GTT, through its subsidiaries including GC Pivotal, LLC, is a global provider of cloud networking services.

GC Pivotal is a Delaware limited liability company with headquarters at 7900 Tysons One Place, Suite 1450, McLean, Virginia 22102. GC Pivotal is a direct, wholly-owned subsidiary of GTTA and an indirect, wholly-owned subsidiary of GTT. The Commission granted GC Pivotal a Certificate of Authority to Provide Telecommunications Service in Oregon and Classification as a Competitive Provider in Order 11-106 on April 6, 2011. GC Pivotal brings together customers and suppliers in an automated platform that provides ubiquitous access network solutions. GC Pivotal provides simple, cost-effective and high-performance network solutions that support the exploding bandwidth requirements driven by Cloud, mobility and globalization. GC Pivotal delivers its solutions to telecommunication carriers, managed service providers, application service providers, and enterprise customers throughout the United States.

II. DESIGNATED CONTACT

Questions, correspondence or other communications concerning this filing should be directed to:

Sharon Thomas
Consultant
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
407-740-3031
stthomas@inteserra.com

III. DESCRIPTION OF TRANSACTION

In order to provide more effective billing and customer service support to the commercial and enterprise customers that constitute API's former customer base, effective January 1, 2019, GC Pivotal became the service provider of record for the customers of API. As a result, API no longer provides telecommunications services in Oregon and therefore requests that the Commission cancel its Certificate and tariff(s) effective December 31, 2018, or the earliest possible date permitted.

As of January 1, 2019, GC Pivotal provides telecommunications services to API's customers pursuant to GC Pivotal's Certificate under the same rates, terms and conditions as the services previously provided by API. In addition, API's customers received prior notice of the change in their provider. The change in provider, therefore, was seamless to customers and the requested cancellation is merely an administrative step. Further, the financial, technical, and managerial resources of GTT, combined with the capabilities of GC Pivotal's telecommunications network will benefit the customer base previously served by API, enhancing their billing and customer service experience and giving them access to the network solutions available from GC Pivotal

Effective with revenues billed in January 2019, all revenues, customer lines and any associated assessments previously reported and remitted by API will be reported and remitted by GC Pivotal. Further, to the extent that API had any outstanding obligations, including deposits, to any customers, GC Pivotal is now responsible for such obligations.

Since API no longer provides telecommunications services in Oregon, and GC Pivotal provides telecommunications services to API's customers pursuant to the same rates, terms and conditions of service, the cancellation of API Certificate will serve the public interest. API, therefore, requests that the Commission act on this request as soon as practicable.

Respectfully Submitted,

Sharon Thomas, Consultant
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