

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Audit of GC Pivotal, LLC)
by the Kansas Universal Service Fund (KUSF))
Administrator Pursuant to K.S.A. 66-2010(b)) Docket No. 24-GCPT-115-KSF
for KUSF Operating Year 26, Fiscal Year)
March 2022-February 2023.)

**RESPONSE TO GC PIVOTAL, LLC'S MOTION FOR EXTENSION OF TIME TO
COMPLY WITH ORDER ADOPTING AUDIT REPORT**

COMES NOW the Staff of the State Corporation Commission of the State of Kansas
("Staff" and "Commission," respectively) in response to the Motion for Extension of Time filed
by GC Pivotal, LLC ("GC Pivotal") and states as follows:

1. On February 24, 2025, GC Pivotal filed a third Motion for Extension of Time to
extend the compliance deadline until May 16, 2025. VPS's Compliance Report would accordingly
be due by June 16, 2025.

2. Staff does not object to extension of the deadline for good cause to no later than May
16, 2025.

WHEREFORE, Staff respectfully requests the Commission give due consideration to
requiring GC Pivotal to periodically advise Staff, as requested, of its progress toward complying
with the requirements of the July 2, 2024, Order Adopting Audit Report if the second Motion for
Extension of Time is granted.

Respectfully submitted,

/s/ Brett W. Berry

Brett W. Berry #15026
Litigation Counsel

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027
(785) 271-3287
b.berry@kcc.ks.gov

CERTIFICATE OF SERVICE

24-GCPT-115-KSF

I, the undersigned, certify that a true and correct copy of the above and foregoing Response to GC Pivotal, LLC's Motion for Extension of Time was served via electronic service this 24th day of February, 2025, to the following:

DAMON BEASLEY, ATTORNEY-IN-FACT
GC PIVOTAL, LLC
D/B/A GLOBAL CAPACITY
7900 TYSONS ONE PLACE STE 1450
McLEAN, VA 22102
damon.beasley@claconnect.com

LESLIE BLAIR, VP OF TAX
GC PIVOTAL, LLC
D/B/A GLOBAL CAPACITY
7900 TYSONS ONE PLACE STE 1450
McLEAN, VA 22102
tax@gtt.net

TAX DEPARTMENT
GC PIVOTAL, LLC
D/B/A GLOBAL CAPACITY
7900 Tysons One Place
Suite 1450
McLean, VA 22102
tax@gtt.net

BRETT W. BERRY, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA, KS 66604
brett.berry@ks.gov

DAWN CARTELLONE, ADMINISTRATIVE ASSISTANT
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
dawn.cartellone@vantagepnt.com

WENDY HARPER, USF SERVICES MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE, SUITE B
SPRINGFIELD, IL 62704
wendy.harper@vantagepnt.com

SHOMARI JACKSON
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
shomari.jackson@vantagepnt.com

DENNIS SMITH
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE STE B
SPRINGFIELD, IL 62704
dennis.smith@vantagepnt.com

NICOLE STEPHENS, KUSF ADMINISTRATOR MANAGER
VANTAGE POINT SOLUTIONS
2930 MONTVALE DRIVE SUITE B
SPRINGFIELD, IL 62704
nicole.stephens@vantagepnt.com

Ann Murphy

CERTIFICATE OF SERVICE

24-GCPT-115-KSF

Ann Murphy