Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of the Application of

Members of Broadband VI, LLC, Transferors,

and

Liberty Mobile USVI Inc., Transferee,

For Consent to Transfer of Control of
Broadband VI, LLC Pursuant
to Section 214 of the Communications Act
of 1934, as Amended

WC Docket No. 21-_____________

To: Chief, Wireline Telecommunications Bureau

APPLICATION FOR TRANSFER OF CONTROL

Pursuant to Section 214 of the Communications Act of 1934, as amended (“the Act”), and Sections 63.03 and 63.04 of the rules of the Federal Communication Commission (“Commission”), members of Broadband VI, LLC (“Transferors”) and Liberty Mobile USVI Inc. (“Liberty” or “Transferee”), by their undersigned representatives, hereby request Commission consent for the transfer of control of Broadband VI, LLC (“BBVI” and, together with Transferors and Liberty, the “Applicants”), an eligible telecommunications carrier (“ETC”) authorized to receive Connect USVI Fund (“CUSVI Fund”) support, to Liberty (the “Proposed Transaction”).

2 47 C.F.R. §§ 63.03, 63.04.
As described herein, the Proposed Transaction will promote the public interest by providing BBVI with additional financial resources, operational capability and management expertise that will allow the company to accelerate its efforts to deploy resilient fiber-based voice and broadband services in the U.S. Virgin Islands and thereby help bridge the digital divide.

The Applicants understands that, as an entity authorized to receive federal high-cost support, BBVI is deemed to hold blanket domestic Section 214 authority pursuant to Section 63.01 of the Commission’s rules and must receive prior Commission approval pursuant to Sections 63.03 and 63.04 to transfer control. (BBVI does not hold international Section 214 authority.) Accordingly, the Applicants respectfully request Commission approval for the transfer of control of BBVI to Liberty.

I. DESCRIPTION OF THE APPLICANTS

A. Broadband VI, LLC

BBVI is a limited liability company organized under the laws of the United States Virgin Islands. Founded in 2003, BBVI currently provides fixed wireless broadband and voice services to approximately 9,000 consumers, businesses, educational institutions and government facilities throughout the U.S. Virgin Islands. On September 5, 2018, the U.S. Virgin Islands Public Services Commission (“PSC”) designated BBVI as an ETC throughout the U.S. Virgin Islands. As an existing provider of broadband services in the U.S. Virgin Islands, BBVI applied for CUSVI Fund Stage 2 support. In the BBVI Authorization Notice, the Wireline Competition Bureau (“Bureau”) authorized BBVI to receive $84,456,870 in support for the deployment of


voice and fixed broadband service to 46,039 locations throughout the Territory at speeds of 1 Gbps download and 500 Mbps upload.\(^5\)

**B. Transferors**

Transferors are Broadband Investments LLLP ("Investments"), a U.S. Virgin Islands limited liability limited partnership, and Michael J. Meluskey, an individual who is also the Chief Technology Officer of BBVI. Investments holds 63.87 percent of the membership units in BBVI. Investments is ultimately controlled by William V. Neville, who is also the CEO of BBVI, and his wife Connie Jones Neville, both of whom are U.S. citizens. Mr. Meluskey, also a U.S. citizen, holds 31.93 percent of the membership units in BBVI. Two other individuals hold a total of 0.20 percent of BBVI and are expected to transfer their ownership interests as part of the Proposed Transaction. University of the Virgin Islands Research Park Corporation ("RTPark") holds four percent of BBVI and the parties do not expect it to transfer its ownership as part of the Proposed Transaction. Ultimately, Liberty will own approximately 96 percent of BBVI.

**C. Liberty Mobile USVI Inc.**

Transferee has been providing commercial mobile services in the USVI for more than 20 years as part of the AT&T corporate family until 2020 when Liberty Latin America Ltd. ("LLA") purchased it. LLA is the ultimate corporate parent to multiple wireline and wireless telecommunications, broadband, and video services operating in the USVI, Puerto Rico, and other areas of Latin America and the Caribbean. LLA’s shares are publicly-traded on the NASDAQ Stock Exchange, and it maintains executive offices in Denver, Colorado.

\(^5\) See BBVI Authorization Notice at 1.
II. DESCRIPTION OF THE PROPOSED TRANSACTION

On October 2, 2021, Transferors, BBVI, Liberty and William V. Neville, the latter as the Transferors’ representative, entered into a membership interest purchase agreement pursuant to which Liberty will acquire Transferors’ membership interests in BBVI. The Transferors’ membership interests constitute approximately 96 percent of BBVI. As a result of the Proposed Transaction, Liberty will acquire a controlling interest in BBVI.

Liberty is an established communications company that is expanding its presence in the Caribbean. As part of this investment and expansion, on June 21, 2021 the Bureau authorized an affiliate of Liberty, Liberty Communications of Puerto Rico LLC (“Liberty PR”), to receive $71,538,994 in Uniendo a Puerto Rico Fund (“Uniendo Fund”) support covering more than 914,000 locations in 43 municipios in Puerto Rico.\(^6\) In its application for the Uniendo Fund, Liberty PR relied in part on the financial, technical, and managerial support of its corporate parent, LLA. As such, Commission staff has recently thoroughly vetted the qualifications of LLA to deploy voice and broadband services through its operating subsidiaries under the same rules and procedures used to authorize BBVI for CUSVI Fund support. In addition, the Commission has approved the qualifications of Liberty and LLA in connection with its acquisition of AT&T’s mobile network in Puerto Rico and the U.S. Virgin Islands.\(^7\)

In their review of the AT&T transaction, the Commission, the Department of Justice (“DOJ”) (in conjunction with the Department of Defense and the Department of Homeland Security) also thoroughly reviewed the ownership and controlling interests in LLA, including the


\(^7\) In re Applications of Liberty Latin America Ltd. and AT&T Inc., Memorandum and Order and Declaratory Ruling, 36 FCC Rcd 2328 (2020).
foreign ownership interests, and approved LLA’s acquisition of Liberty subject to the conditions described in the approval order, which were that LLA: (i) divest certain fiber assets and (ii) agree to a national security letter of agreement, which covers the Liberty mobile operations in the USVI, is standard DOJ practice, and remains in force. Finally, the Commission issued a declaratory ruling approving the foreign ownership of LLA in excess of the 25 percent benchmark in Section 310(b)(4) of the Act. The aforementioned national security and foreign ownership review conducted by the Commission, the DOJ, and other relevant Departments of the federal government were both extremely thorough and very recent. The Commission also recently adopted a policy that it would not routinely refer applications that only involve a domestic Section 214 authorization for DOJ review for any national security concerns, unless the applicant is also required to seek a Section 310(b) foreign ownership ruling. No such ruling is required in the Proposed Transaction because BBVI does not hold any wireless common carrier licenses. Therefore, a referral to the DOJ is not necessary with respect to the foreign ownership interests in the Transferee because Liberty and its parent were recently vetted by the DOJ for any national security concerns and remain subject to the obligations in their letter of agreement with the DOJ that more than thoroughly protects any national security implications of the Proposed Transaction.

As evidenced by the attached certification, Liberty certifies that upon consummation of the Proposed Transaction, Liberty’s experienced management team will assume the operations of BBVI, including BBVI’s CUSVI Fund obligations. As a result of the AT&T acquisition and its

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8 Id. at ¶ 8, 32-34.
9 Id. at ¶ 35-44.
own Uniendo Fund obligations, Liberty is rapidly expanding its labor force and increasing its investment. Liberty is very familiar with the deployment obligations under the high-cost funds, and can leverage its existing infrastructure and capital resources to take on BBVI’s obligations to consumers as well as to the Commission. Liberty plans to retain BBVI employees who are knowledgeable about the company and its operations, and can help ensure a smooth transition to Liberty.

The Proposed Transaction is expected to be completed in the fourth quarter of 2021, subject to the Commission’s approval of this application and applications filed with the Wireless Telecommunications Bureau for the transfer of control of microwave licenses held by BBVI.

Diagrams of the pre- and post-Proposed Transaction corporate structure of Applicants are attached hereto as Exhibits A and B, respectively.

III. PUBLIC INTEREST STATEMENT

Pursuant to Section 214 of the Act, the Commission will approve a transfer of control of an authorization if it concludes that, after balancing the potential benefits and harms, doing so would serve the public interest, convenience, and necessity.\(^{11}\) The Proposed Transaction easily satisfies this legal standard. Consistent with Commission standards and requirements, Applicants respectfully request that the Commission find that the Proposed Transaction is in the public interest and grant this Application.

First, the Proposed Transaction will provide BBVI access to capital from Liberty’s substantial financial resources, which will enable BBVI to continue to provide high-quality voice and broadband services to its customers, who will suffer no loss or impairment of service as a result of the Proposed Transaction. Moreover, Liberty’s strong financial position will strengthen

\(^{11}\) 47 U.S.C. § 214.
BBVI’s ability to enhance and expand its infrastructure, geographical reach and service offerings. In particular, as a result of this infusion of capital, BBVI will be well positioned to accelerate the network construction and deployment of the CUSVI Fund fiber network that will make voice and Gigabit broadband available to all 46,039 locations in the U.S. Virgin Islands by the end of 2027, as required by Stage 2 of the CUSVI Fund program. In fact, Liberty has extensive experience in upgrading telecommunications networks in developing economies, as well as upgrading the services available there. For example, Liberty completely upgraded its copper network in Barbados to fiber, and similarly upgraded the networks in Curacao, St. Lucia, St. Vincent and the Grenadines, and Grenada with hybrid-fiber coax plan. Liberty has launched similar projects in Anguilla, Bahamas, the British Virgin Islands, the Cayman Islands, Dominica, Jamaica, Panama, and St. Kitts and Nevis. To this end, the Transferee certifies that all of BBVI’s CUSVI Fund obligations will be met.\textsuperscript{12}

In all other respects, BBVI’s deployment plans will remain unchanged as a result of the Proposed Transaction, as Liberty does not contemplate any changes in the technologies or deployment plans that BBVI described in its Stage 2 application or any changes to BBVI’s Disaster Preparation and Response Plan. Moreover, the Proposed Transaction will not compromise BBVI’s Stage 2 obligations through the assumption of debt – in fact, as a much larger company with access to significant capital, BBVI will be in a stronger financial position with Liberty’s investment than without it. The Proposed Transaction therefore will serve the public interest because it will not result in any harms to BBVI’s existing customers and will accelerate the company’s ongoing efforts to deploy its Gigabit network.

\textsuperscript{12} See also Certifications of Carla Framil Ferran and William V. Neville attached hereto.
Second, Liberty has extensive operational experience and managerial capabilities and resources, which will help steer BBVI’s service enhancements and expansion, including in connection with BBVI’s existing fixed wireless broadband network and deployment of the planned fiber network. Notably, following the consummation of the Proposed Transaction, BBVI will have the necessary managerial and operational expertise to meet the company’s Stage 2 buildout and performance obligations. It also will rely on BBVI key employees to assist with the ownership transition and meet the needs to customers. BBVI also will leverage Liberty’s existing 4G/5G wireless network as its redundant network.

Third, while the Proposed Transaction will enhance BBVI’s capabilities, it will not adversely affect competition in any geographic market. To the contrary, by enabling BBVI to enhance and expand its service offerings and therefore better compete with other service providers, the Proposed Transaction will be pro-competitive.

Fourth, because the proposed change in ownership will occur at the investor level, the Proposed Transaction will be seamless with respect to BBVI’s existing customers. BBVI will continue to provide high-quality voice and broadband services to its customers, and, apart from gradually replacing and expanding BBVI’s fixed wireless network with fiber connectivity, Liberty has no plans to discontinue any existing services or otherwise implement any changes in rates, terms, or conditions in connection with the Proposed Transaction.

For these reasons, the Proposed Transaction will serve the public interest, convenience, and necessity, and the Commission therefore should grant this Application.

IV. INFORMATION REQUIRED BY 47 C.F.R. § 63.04

In support of their request for consent to transfer control of the domestic Section 214 authorization held by Licensee, Applicants submit the following information pursuant to Section 63.04 of the Commission’s rules:
(a)(1) Name, address, and telephone number of each Applicant:

**Broadband VI, LLC**

Broadband VI, LLC  
6006 Estate Peters Rest, Suite 2  
Christiansted, VI 00820  
(340) 719-2943

**Transferors**

William V. Neville  
Broadband Investments LLLP  
6006 Estate Peters Rest, Suite 2  
Christiansted, VI 00820  
(340) 719-2542

Michael J. Meluskey  
P.O. Box 24234  
Christiansted, VI 00824  
(340) 643-1588

**Transferee**

Liberty Mobile USVI Inc.  
279 Ponce De Leon Avenue  
San Juan, PR 00918  
(787) 657-3050

(a)(2) Jurisdiction under which each Applicant is organized:

BBVI is a limited liability company organized under the laws of the United States Virgin Islands. Liberty is a corporation organized under the laws of Delaware.
Correspondence concerning this Application should be addressed to:

**Transferor**

William V. Neville  
Broadband VI, LLC  
6006 Estate Peters Rest, Suite 2  
Christiansted, VI 00820

with a copy to:

Stephen E. Coran  
Lerman Senter PLLC  
2001 L Street NW, Suite 400  
Washington, DC 20036  
Tel: (202) 416-6744  
scoran@lermansenter.com

**Transferee**

Liberty Mobile USVI Inc.  
279 Ponce De Leon Avenue  
San Juan, PR 00918

with a copy to:

Danielle Frappier  
Davis Wright Tremaine LLP  
1301 K Street NW, Suite 500 East  
Washington, DC 20005  
(202) 973-4242  
daniellefrappier@dwt.com

**Name, address, citizenship, and principal business of owners with 10% or greater direct or indirect ownership interest:**

**Transferor**

The following individuals and entities currently hold a 10% or greater direct or indirect equity or voting interest in Broadband VI LLC.

Name: Broadband Investments LLLLP  
Address: P.O. Box 3040  
City, State, Zip: Kingshill, VI 00851  
Citizenship: United States  
Principal Business: Wireless communications investment  
Percentage of Ownership: 63.87%

The ultimate owners of Broadband Investments LLLLP are William V. Neville and Connie Jones Neville, husband and wife. Their ownership interests are diagrammed on Exhibit A hereto. Both William V. Neville and Connie Jones Neville are United States citizens, and their address is the same as that listed above for Broadband Investments LLLLP.

Name: Michael J. Meluskey  
Address: P.O. Box 26304  
City, State, Zip: Christiansted, VI 008290  
Citizenship: United States
Principal Business: CTO of Broadband VI
Percentage of Ownership: 31.93%

BBVI’s pre-closing ownership is depicted on Exhibit A hereto.

**Transferee**

The following entity holds a 100% direct equity and voting interest in Liberty:

Name: Liberty Mobile Inc. (f/k/a Beach Holding Corporation)
Mailing Address: 1550 Wewatta Street, Suite 710
City, State, Zip: Denver, CO 80202
Citizenship: Delaware
Principal Business: Holding company
Percentage of Ownership: 100% direct

The following entity holds a 100% direct equity and voting interest in Liberty Mobile Inc.:

Name: LLA Holdco LLC
Mailing Address: 1550 Wewatta Street, Suite 710
City, State, Zip: Denver, CO 80202
Citizenship: Delaware
Principal Business: Holding Company
Percentage of Ownership: 100% direct

The following entity holds a 100% direct equity and voting interest in LLA Holdco LLC:

Name: LCPR Ventures LLC
Mailing Address: 1550 Wewatta Street, Suite 710
City, State, Zip: Denver, CO 80202
Citizenship: Delaware
Principal Business: Holding Company
Percentage of Ownership: 100% direct

The following entity holds a 100% direct equity and voting interest in LCPR Ventures LLC:

Name: Liberty Communications PR Holding LP (f/k/a Leo Cable LP)
Mailing Address: 1550 Wewatta Street, Suite 710
City, State, Zip: Denver, CO 80202
Citizenship: Delaware
Principal Business: Holding Company
Percentage of Ownership: 100% direct
The following entity holds a 100 percent voting (general partner interest) in Liberty Communications PR Holding LP:

Name: Leo Cable LLC  
Mailing Address: 1550 Wewatta Street, Suite 710 Denver, CO 80202  
Citizenship: Delaware  
Percentage Held: 100 percent indirect interest in Liberty

The following entity holds a 66.39 percent limited partnership/economic interest in Liberty Communications PR Holding LP and a 66.39 percent voting/equity interest in Leo Cable LLC:

Name: LiLAC Ventures Ltd.  
Address: 2 Church Street, Hamilton, Bermuda HM 11  
Citizenship: Cayman Islands  
Percentage Held: 66.39 percent indirect interest in Liberty

The following entity holds a 33.61 percent limited partnership/economic interest in Liberty Communications PR Holding LP and a 33.61 percent voting/equity interest in Leo Cable LLC:

Name: LiLAC Communications Inc.  
Mailing Address: 1550 Wewatta Street, Suite 710 Denver, CO 80202  
Citizenship: Delaware  
Percentage Held: 33.61 percent indirect interest in Liberty

The following entity holds a direct 100 percent equity/voting interest in LiLAC Communications, Inc.:

Name: LGI International Holdings, LLC  
Mailing Address: 1550 Wewatta Street, Suite 710 Denver, CO 80202  
Citizenship: Colorado  
Percentage Held: 100 percent indirect interest in Liberty

The following entity holds a direct 100 percent equity/voting interest in LGI International Holdings, LLC:
Name: LiLAC Services Ltd.\textsuperscript{13}
Mailing Address: 2 Church Street, Hamilton, Bermuda HM 11
Citizenship: Bermuda
Percentage Held: 100 percent indirect interest in Liberty

The following entity holds a direct 100 percent equity/voting interest in LiLAC Services Ltd.:

Name: Liberty Latin America Ltd.
Mailing Address: 2 Church Street, Hamilton, Bermuda HM 11 (principal executive offices); 1550 Wewatta Street, Suite 710, Denver, CO 80202 (U.S. executive offices)
Citizenship: Bermuda
Percentage Held: 100 percent indirect interest in Liberty

The following individual holds a direct 10 percent or greater interest in Liberty Latin America Ltd.:

Name: John C. Malone
Mailing Address: c/o 1550 Wewatta Street, Suite 710, Denver, CO 80202
Citizenship: United States
Percentage Held: 25.40 percent indirect voting and 5.40 percent indirect equity interest in Liberty

BBVI’s post-closing ownership is depicted on Exhibit B hereto.

\textbf{(a)(5) Anti-Drug Abuse Act certification:}

Applicants certify as evidenced by the attached certifications that no party to this Application is subject to a denial of federal benefits under Section 5301 of the Anti-Drug Abuse Act of 1988, as amended.

\textbf{(a)(6) Description of the Proposed Transaction:}

The Proposed Transaction is described in Section II above.

\begin{footnotesize}
\textsuperscript{13} LiLAC Services Ltd also holds a direct 100 percent equity/voting interest in LiLAC Ventures Ltd.
\end{footnotesize}
(a)(7) **Description of the geographic area in which Transferor and Transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:**

BBVI will provide interconnected VoIP service on a common carrier basis to all locations in the United States Virgin Islands.

(a)(8) **Statement as to this Application’s eligibility for streamlined treatment:**

This Application is eligible for streamlined processing pursuant to Section 63.03 of the Commission’s rules.14 In particular, it is eligible for streamlined processing under Section 63.03(b)(2)(i) because (i) BBVI and its affiliates have and would have a market share in the interstate, interexchange market of less than 10 percent, (ii) BBVI and its affiliates provide and would provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the Proposed Transaction, and (iii) neither of the Applicants is dominant with respect to any service.15 Applicants understand, however, that the Bureau may elect not to apply streamlined treatment to this Application because of the need to confirm Liberty’s qualifications to assume the CUSVI Fund obligations. Nevertheless, Applicants submit that expeditious approval of this Application would serve the public interest.

(a)(9) **Identification of all other Commission applications related to the Proposed Transaction:**

In addition to requesting consent to transfer control of the domestic Section 214 authorization held by Licensee, Applicants are seeking consent to transfer control of non-common carrier microwave licenses held by BBVI.

14 *See* 47 C.F.R. § 63.03.
15 *See id.* § 63.03(b)(2)(i).
(a)(10) **Statement of whether Applicants are requesting special consideration because either party is facing imminent business failure:**

Applicants are not requesting special consideration; no party to the Proposed Transaction is facing imminent business failure.

(a)(11) **Identification of any separately filed waiver requests being sought in conjunction with the Proposed Transaction:**

No separately filed waivers are currently being sought in conjunction with the Proposed Transaction.

(a)(12) **Statement showing how grant of this Application will service the public interest, convenience, and necessity:**

The Commission’s grant of this Application will serve the public interest, convenience, and necessity for the reasons detailed in Section III.
V. CONCLUSION

For the foregoing reasons, the Commission's grant of this Application will serve the public interest, convenience, and necessity. Accordingly, Applicants respectfully request that the Commission grant this Application.

Respectfully submitted,

[Signature]
Stephen E. Coran
Lerman Senter PLLC
2001 L Street NW
Suite 400
Washington, DC 20036
(202) 416-6744
scoran@lermansenter.com

Counsel to Broadband VI, LLC

Date: October 5, 2021

[Signature]
Danielle Frappier
Davis Wright Tremaine LLP
1301 K Street NW
Suite 500 East
Washington, DC 20005
(202) 973-4242
daniellefrappier@dwt.com

Counsel to Liberty Mobile USVI Inc.
EXHIBIT A—PRE-TRANSACTION OWNERSHIP OF BBVI

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William V. Neville 1999 Irrevocable Trust (U.S.)
   100%
   WVN 1999 LLC (U.S.)
       49%
       Broadband Investments LLLP (U.S.)
           63.87%
           Broadband VI, LLC (U.S.)

Connie Jones Neville 1999 Irrevocable Trust (U.S.)
   100%
   CJN 1999 LLC (U.S.)
       48%
       Core Group Management LLC (U.S.)
           50%
           William V. Neville (U.S.)
               50%
               Connie Jones Neville (U.S.)

Michael J. Meluskey (U.S.)
   31.93%
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EXHIBIT B—POST-TRANSACTION OWNERSHIP OF BBVI

Liberty Latin America Ltd.  
(Bermuda)

LiLAC Services Ltd.  
(Bermuda)

Intervening Holding Companies  
As Described Above

Liberty Mobile Inc.  
f/k/a Beach Holding Corporation  
(U.S.)

Liberty Mobile USVI Inc.  
f/k/a AT&T Mobility USVI Inc.  
(U.S.)

Approx. 96%

Broadband VI, LLC  
(U.S.)
CERTIFICATIONS IN SUPPORT OF THE APPLICATION FOR CONSENT TO TRANSFER CONTROL OF DOMESTIC AUTHORIZATION PURSUANT TO SECTION 214 OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED, HELD BY BROADBAND VI, LLC

I, William V. Neville, under penalty of perjury, certify:

1. I am over the age of 18 years.

2. I am the Agent for the Manager and Sole Member of the Management Committee of Broadband VI, LLC ("BBVI") and Agent for the General Partner of Broadband Investments LLLP; and

3. Neither BBVI nor Broadband Investments LLLP is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief this and that these Certifications were executed on this __ day of October, 2021 at Christiansted, United States Virgin Islands.

By: ____________________________

William V. Neville
CERTIFICATIONS IN SUPPORT OF THE APPLICATION FOR CONSENT TO TRANSFER CONTROL OF DOMESTIC AUTHORIZATION PURSUANT TO SECTION 214 OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED, HELD BY BROADBAND VI, LLC

I, Carla Framil Ferrán, under penalty of perjury, certify:

1. I am over the age of 18 years.

2. I am the General Counsel of Liberty Mobile USVI Inc. (“Transferee”).

3. Transferee certifies that upon consummation of the proposed transfer of control, Transferee’s experienced management team will assume the operations of Broadband VI, LLC (“BBVI”), including BBVI’s Connect USVI Fund (“CUSVI Fund”) obligations;

4. Transferee further states that it is familiar with deployment obligations under the high-cost funds, and can leverage its existing infrastructure and capital resources to address BBVI’s obligations to consumers as well as to the Commission;

5. Transferee certifies that BBVI’s CUSVI Fund obligations will be met; and

6. Transferee is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief this and that these Certifications were executed on this 5th day of October 2021 at San Juan, Puerto Rico.

By: [Signature]

Carla Framil Ferrán
General Counsel