

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Request for Waiver of Lower 700 MHz)	
Band Interim and End-of-Term)	WT Docket No. 18-67
Geographic Construction Benchmarks for)	
Alaska B-Block License WQIZ597)	

COMMENTS OF THE RURAL WIRELESS ASSOCIATION, INC.

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Summary

More than a year after filing its construction notification to demonstrate compliance with its obligation to provide service to 35% of its license area by December 13, 2016, AT&T is seeking a waiver to allow it to meet its interim (and final) buildout obligations based on population coverage rather than geographic coverage. AT&T's waiver request comes only after it learned that Commission staff found that AT&T had failed to meet its interim construction benchmark requiring coverage of 35% of the territory of its license area by December 13, 2016. AT&T's Amended Petition indicates that the discrepancy in AT&T's coverage calculations (37.5%) and Commission staff's finding (slightly less than 35% according to AT&T) arises from the fact that AT&T had incorrectly excluded certain Alaskan Native lands in calculating its geographic coverage despite the fact that the Commission's rules clearly require native lands to be included in any coverage calculations.

Rather than request FCC staff to accept its buildout showing as substantial compliance with the interim buildout obligation or request a brief extension of the interim buildout deadline to allow it to meet the buildout requirement, AT&T instead argues that Alaska is unique and that the challenges of providing service in Alaska justify the use of population coverage benchmarks in lieu of geographic coverage benchmarks. This argument must be rejected for a number of reasons.

The argument is untimely. The Commission had the opportunity to consider using population benchmarks in Alaska when it adopted its buildout rules for 700 MHz licenses and chose not to do so. AT&T may not now challenge that decision.

Additionally, while the Commission may waive its rules in particular cases based on a showing of special circumstances, no such showing has been made in this case. Unlike other cases where the applicants were able to demonstrate to the Commission's satisfaction that meeting the interim 35% geographic coverage benchmark was commercially impracticable, if not impossible, AT&T's own pleading demonstrates that just the opposite is true in this case. In its Original Petition AT&T admits that it made a conscious decision to forgo requesting a waiver to allow the use of population coverage benchmarks in CMA316 precisely because it believed that it could and would meet the geographic benchmark. AT&T's failure to do so because of its own mapping error is not grounds for the relief that it requests, especially considering that AT&T's amended petition identifies additional sites that AT&T planned to build but were not slated to be constructed until 2019.

Granting the relief requested to AT&T in this case would be contrary to Commission precedent in a factually indistinguishable case involving two 700 MHz licenses in American Samoa. In that case, the Commission refused to apply population coverage benchmarks in lieu of geographic benchmarks even though: (1) the market was remote, isolated, low density with large inaccessible and uninhabited areas, climatically and topographically challenging, and lacking in infrastructure and electricity; and (2) the licensee's failure to meet the 35% coverage requirement was due at least in large part to incorrect shapefiles provided by the Commission in its 700 MHz Public Notice that provided licensees with the templates and market-based boundary files to be used for 700 MHz construction demonstrations. To the contrary, the Commission found that maintaining the geographic coverage requirement even in a situation where the licensee provided coverage to 90 percent of the population in its market would provide

the licensee “with a continued incentive to expand its network and deploy wireless services to the more remote areas.” These same considerations apply in the present case involving AT&T.

Finally, AT&T’s arguments that wireless deployment would be delayed absent a waiver and that it is unlikely that other service providers would be interested in building out any unserved areas or be able to meet buildout obligations ignore the facts and the law. The Commission’s ULS files demonstrate there are at least two unaffiliated service providers that have entered into spectrum leasing agreements with AT&T to build out portions of AT&T’s license area in CMA316 and there could well be other carriers with an interest in expanding service in that market. Likewise, AT&T’s claim that such carriers would be unable to meet the 35% and 70% geographic benchmarks applicable to AT&T is incorrect as a matter of law and simply misstates the procedures set forth in the Commission’s rules with respect to service obligations in reclaimed areas and the buildout obligations imposed on successful applicants to provide service in those reclaimed areas. For these reasons, AT&T’s requested waiver should be denied.

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COMMENTS OF THE RURAL WIRELESS ASSOCIATION, INC.

The Rural Wireless Association, Inc. (“RWA”)¹ files these comments in response to the Federal Communications Commission (“FCC” or “Commission”) Wireless Telecommunications Bureau (“WTB” or “Bureau”) Public Notice² seeking comment on an amended waiver petition (“Amended Petition”) filed by AT&T Services, Inc., on behalf of its subsidiary AT&T Mobility Spectrum, LLC (collectively, “AT&T”). The Amended Petition requests a waiver of the Commission’s regulations pertaining to geographic coverage benchmarks and notice of compliance with those benchmarks specified in Rule Sections 1.946(b)-(d), 1.955(a)(2), and 27.14(g) and (k) for WQIZ597, a lower 700 MHz B-block license in the cellular market area (“CMA”) 316 (Alaska 2-Bethel). For the reasons set forth herein, RWA opposes grant of the requested waiver.

¹ RWA is a 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies who serve rural consumers and those consumers traveling to rural America. RWA’s members are small businesses serving or seeking to serve secondary, tertiary, and rural markets. RWA’s members are comprised of both independent wireless carriers and wireless carriers that are affiliated with rural telephone companies. Each of RWA’s member companies serves fewer than 100,000 subscribers.

² *Wireless Telecommunications Bureau Seeks Comment on AT&T Request for Waiver of Geographic Coverage Requirement for 700 MHz License in Alaska*, WT Docket No. 18-67 Public Notice, DA 18-314, (March 29, 2018).

I. Summary of Facts

On November 29, 2016 AT&T filed its construction notification for WQIZ597 which purported to show that it had constructed facilities and was providing service to 37.5% of the geographic area covered by its license as required by section 27.14(g) of the Commission's rules.³ Nowhere in that construction notification did AT&T give any indication that the terrain, climate, topography or size of its license area would in any way prevent AT&T from meeting its geographic buildout obligation to serve 35% of its license territory by December 13, 2016. To the contrary, AT&T filed its construction notification a month early and very clearly indicated that not only had it met the coverage requirement, but the "level of coverage and service may increase through the deployment of additional facilities before the build-out deadline."⁴

On March 1, 2018, more than a year after filing its construction notification, AT&T filed a modification of that notification and requested a waiver of the Commission's buildout rules to allow AT&T to use population coverage rather than geographic coverage benchmarks to establish compliance with its construction obligations, including its obligation to meet its 35% geographic buildout obligation by December 13, 2016 ("Original Petition").⁵ On March 12, 2018 AT&T amended its waiver petition and it is upon the Amended Petition that the Bureau has requested comment.

In the Amended Petition, AT&T proposes that it be allowed to meet "population benchmarks of 75% as of December 16, 2016, 80% by June 13, 2019, and 85% by June 13, 2020

³ See ULS file no. 0007573088 at Exhibit 1.

⁴ *Id.*

⁵ See ULS file no. 0008116627.

and for a period of at least five years thereafter.”⁶ AT&T has also proposed to “file reports confirming it has met these benchmarks within 15-days and to negotiate in good faith with any third party seeking to lease spectrum in any geographic area of CMA316 not served by AT&T.”⁷

AT&T’s Amended Petition indicates that its waiver request was filed after learning that, upon reviewing AT&T’s construction notification, Commission staff found that AT&T had failed to meet its interim construction benchmark requiring coverage of 35% of the territory of its license area by December 13, 2016.⁸ AT&T also acknowledges that, absent a waiver, section 27.14(g)(1) of the Commission’s rules would operate to reduce the term license of WQIZ597 by two years, from June 13, 2019 to June 13, 2017, and having failed to meet the final benchmark on that date, section 27.14(g)(2) of the rules would operate to automatically terminate AT&T’s license authority over any areas that remained unserved as of that date, with those unserved areas reverting to the Commission for reassignment.⁹

II. Argument

It is axiomatic that an applicant requesting a waiver of the Commission’s rules must “meet a high hurdle at the starting gate.”¹⁰ Section 1.925(b)(3) of the rules provides that the Commission may grant a request for waiver if it is shown that:

- (i) The underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, *and* that a grant of the requested waiver would be in the public interest; or

⁶ Amended Petition at p. 9.

⁷ *Id.*

⁸ The Amended Petition indicates that the discrepancy in AT&T’s coverage calculations (37.5%) and Commission staff’s finding (less than 35%) arises from the fact that AT&T had incorrectly excluded certain Alaskan Native lands in calculating its geographic coverage. Amended Petition at p. 10.

⁹ Amended Petition at p. 2.

¹⁰ See *WAIT Radio v. FCC*, 459 F.2d 1203, 1207 (D.C. Cir. 1972).

(ii) In view of the unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.¹¹

AT&T's Amended Petition fails to meet either of these standards.

In support of its waiver request, AT&T argues that Alaska is unique due to its remoteness, topography, climate and sparse population.¹² Because of this uniqueness, AT&T argues that geographic benchmarks are unsuitable for CMA316¹³ and that population-based coverage benchmarks are suitable.¹⁴ This argument must be rejected as untimely. AT&T is effectively attempting to challenge the Commission's decision to require geographic benchmarks in lieu of population benchmarks for Lower 700 MHz B Block licenses in the State of Alaska. AT&T could have sought reconsideration and/or review of the Commission's decision to impose geographic buildout benchmarks in Alaska when those rules were adopted. It may not do so now.¹⁵

The Commission's decision to impose geographic construction benchmarks coupled with stringent performance requirements for all previously unauctioned Economic Area ("EA") and

¹¹ 47 C.F.R. §1.925(b)(3) (emphasis added).

¹² Amended Petition at pp. 5-6.

¹³ Amended Petition at pp. 6-7.

¹⁴ Amended Petition at pp. 7-10.

¹⁵ RWA acknowledges that the Commission has granted waivers to allow the use of population benchmarks in other, more challenging markets in Alaska. However, it is important to note that the waivers in those cases were all requested on a timely basis and involved individual circumstances where the licensees were able to demonstrate to the Commission's satisfaction an inability to meet even the 35% interim geographic benchmark due to the sheer size and population distribution in those markets. Those cases in no way represent a repudiation of the geographic buildout requirement across all markets in Alaska generally and the factors found to justify a waiver in those cases are not present in this case where, as discussed below, AT&T's own filings demonstrate that it made a conscious decision not to request a waiver when it submitted its buildout showing because of its confidence that it could and would meet the 35% interim geographic benchmark.

Cellular Market Area (“CMA”) Lower 700 MHz licenses (including those in Alaska) was a deliberate policy adopted after careful consideration of the alternatives.¹⁶ The effect of imposing these benchmarks in challenging terrains such as Alaska was expressly raised in comments submitted in that proceeding and considered by the Commission in formulating its buildout requirements.¹⁷ The Commission could have chosen to impose population based buildout requirements in Alaska due to all of the factors cited by AT&T as making that State unique. It chose not to do so. Likewise, the Commission also considered and rejected using the same “substantial service” benchmark and “rural safe harbor” criteria that it had adopted for previously auctioned 700 MHz licenses and which it could have applied to all 700 MHz licenses in Alaska had it believed that its buildout policies would not be served by applying geographic coverage requirements in that State.¹⁸

In adopting geographic coverage requirements for 700 MHz B Block licenses across the board, the Commission acknowledged the possibility of granting waivers in special very limited circumstances but clearly stated that it “[did] not envision granting waivers or extensions of construction periods except where unavoidable circumstances beyond the licensee’s control delay construction.”¹⁹ AT&T fails to demonstrate the presence of any such unavoidable circumstances.

¹⁶ These performance requirements include accelerating the end of the license term by two years if the interim geographic benchmark is not met and a “keep-what-you-use” rule that removes all unserved areas from the license territory if the end of term benchmark is not met. See 47 C.F.R. §27.14(h).

¹⁷ See, e.g., *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, WT Docket No. 06-150 et al., Comments of Rural Cellular Association at p.7 (submitted May 23, 2007).

¹⁸ *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, et al.*; Second Report and Order, WT Docket No. 06-150, et al., rel. Aug. 10, 2007 (“Second Report and Order”) at ¶153. Indeed, this decision has proven to be sound as a number of 700 MHz licensees in Alaska (including AT&T in CMA315 and CMA187) have successfully met their interim buildout obligation to provide coverage to 35% of their license territory by December 13, 2016.

¹⁹ *Id.*

AT&T claims that the Commission should consider the fact that Alaska is isolated, low density, rural and subject to climatic and geographic challenges in determining “whether AT&T has met its obligation to adequately use the spectrum to serve customers.”²⁰ However, the Amended Petition is devoid of *any* showing that the factors cited by AT&T to underscore the uniqueness of Alaska had anything to do with AT&T’s failure to meet its interim buildout obligation in CMA316. To the contrary, the Amended Petition makes clear that AT&T’s failure to meet the 35% interim buildout requirement by its own admission was attributable entirely to the fact that it incorrectly calculated its existing coverage by failing to include all native lands in its coverage calculations as the rules require it to do. These rules clearly state:

In applying these geographic benchmarks, licensees are not required to include land owned or administered by government as a part of the relevant service area. Licensees may count covered government land for purposes of meeting their geographic construction benchmark, but are required to add the covered government land to the total geographic area used for measurement purposes. *Licensees are required to include those populated lands held by tribal governments and those held by the Federal Government in trust or for the benefit of a recognized tribe.*

47 C.F.R. §27.14(g) (emphasis supplied).²¹

Nor does AT&T’s Amended Petition contain any showing that Alaskan weather, topography, remoteness, or low population density prevented AT&T from constructing additional sites that would have allowed it to meet its interim build out obligation, and in fact the

²⁰ Amended Petition at p. 6.

²¹ The foregoing rule section entirely undercuts AT&T’s claim that “This discrepancy in meeting the interim construction benchmark occurred due to the ambiguity in Commission rules and processes as to the appropriate sources for identifying Alaska native lands and the treatment of those lands.” Amended Petition at p. 4. The Commission’s rules are not ambiguous. Those rules do not specify any particular processes or sources to identify native lands and place the burden of identifying such lands on the licensee, not only in Alaska but in all states. The requirement to include native lands in calculating geographic coverage could not be more crystal clear.

Amended Petition admits that AT&T had already identified at least two such planned additional sites.²² The fact that AT&T voluntarily chose to delay construction of those sites until 2019 was a business decision made by AT&T and should not be considered a circumstance beyond the licensee's control that would justify a waiver of the Commission's buildout rules.

AT&T also argues that it is in the public interest to effectively ignore its failure to meet the interim buildout deadline because: (i) enforcement of the buildout rules "would merely delay broadband deployment at least in the near future"²³; (ii) "[o]ther providers would not likely claim the unserved areas and provide service in these remotest and sparsely populated areas"²⁴ and, (iii) "even if claimed, those new licensees would experience the same challenges as AT&T and not likely meet their geographic coverage benchmarks."²⁵ These assertions are unsupported, purely speculative and are contrary to the facts and the law.

In addition to being utterly without support, AT&T's argument that enforcing the buildout rules would delay broadband deployment in Alaska entirely ignores the fact that AT&T does not plan to build the additional sites referred to in Amended Petition until 2019, which is one to two years after it filed its November 2016 construction notice. AT&T's willingness to skip the 2017 and 2018 construction windows strongly suggests AT&T does not appear to be in any great rush to expand service in CMA 316 and might not have done all that it reasonably could have to maximize geographic coverage in this market prior to the interim construction deadline.

²² Amended Petition at p. 9.

²³ Amended Petition at p.2.

²⁴ *Id.*

²⁵ *Id.* AT&T also makes clear that benchmarks that it is referring to here are the 35% geographic coverage interim benchmark and 70% geographic coverage final benchmark. See Amended Petition 7 wherein AT&T states that it is "unlikely that any provider could economically meet 35% or 70% geographic coverage." Amended Petition at p.7

AT&T's claim that other providers would not likely desire to expand services into unserved areas in CMA316 is simply untrue. AT&T currently has in place or has applications pending for spectrum leases that it has entered into with two unaffiliated service providers who are willing and able to provide services in CMA316.²⁶ RWA would suggest that there are likely other carriers that would desire to do so as well.

AT&T's claim that any carrier that desired to serve any unserved areas reverting to the Commission due to AT&T's failure to meet the interim and accelerated final benchmarks would be required to meet those same 35 percent and 70 percent buildout benchmarks reflects, at worst, a mischaracterization and, at best, a fundamental misunderstanding of the procedures to be followed in making unserved areas available for relicensing. Once the Commission announces availability of areas for relicensing, applicants are free to submit applications to serve any portion of the unserved areas that they wish to serve. They are not required to serve the entire unserved area eligible for relicensing. The rules clearly state that a reauction of spectrum is required only if two or more applicants propose to serve reclaimed areas that overlap. The corollary to this is that applicants may submit applications that do not overlap and this would be possible only if applicants were free to submit applications for less than the entire reclaimed area. The rules also provide that winning applicants will be required to serve 100% of their licensed territory within one year or lose their license, a buildout standard that is far more strict than the interim and final benchmarks that applied to the original licensee, and a standard that would only

²⁶ See ULS File Nos. 0008103012 and 0008093691 (leases to Arctic Slope Telephone Association Cooperative, Inc.), and 0006717348 (lease to Cordova Wireless Communications, LLC).

make sense if applicants were free to propose service to specific portions of the reclaimed areas that they desire and are able to serve.²⁷

As a final matter, the Amended Petition requests a waiver of the December 28, 2016 filing deadline to allow AT&T to amend its performance showing to demonstrate alternative population-based construction for WQIZ597. AT&T claims that “[s]uch a waiver is warranted because AT&T would have no alternative but to file the alternative population-based performance showing after the already expired deadline and because application of the deadline would be inequitable in this circumstance. . . . Despite AT&T’s diligence, including active engagement with Commission staff, and reliance on public data sources to identify and exclude government lands from its WQIZ597 build calculation, AT&T unintentionally excluded some Alaska native lands as well. After staff notified AT&T of this discrepancy, a timely alternative build showing was no longer possible due to the passage of the deadline.”²⁸

The foregoing statements are simply not credible. If AT&T was unable to meet its buildout obligations due to climatic and geographic circumstances as it suggests, AT&T clearly could have sought a waiver on such grounds in a timely manner. Indeed, not only could AT&T have made its waiver request in a timely fashion (*i.e.*, prior to the December 13, 2016 interim benchmark filing deadline) but the Original Petition filed with the Commission on March 1, 2018 demonstrates that AT&T actually did so and then made a conscious business decision to forgo that waiver request precisely because it believed it would be able to meet the interim geographic buildout requirement to cover 35 percent of its license territory.²⁹ Having made a conscious decision to forgo making its waiver request in a timely fashion, AT&T cannot now get a second bite at the apple by claiming

²⁷ See 47 C.F.R. §27.14(j).

²⁸ Amended Petition at pp.10-11.

²⁹ Original Petition at p.2, footnote 3.

that mapping uncertainties and the passage of time somehow left it with no choice but to ask for a waiver retroactively.³⁰

However, even if AT&T were correct in its claim that mapping ambiguities and the passage of time should entitle it to some relief from the Commission, the relief requested by AT&T would be entirely inappropriate and contrary to Commission precedent under the facts of this case. In a recent case involving nearly identical circumstances, a case which RWA asserts is controlling, the Commission rejected the licensee's waiver request that it be allowed it to meet its buildout obligations based on population benchmarks instead of geographic benchmarks despite the fact that: (1) the market was remote, isolated, low density with large inaccessible and uninhabited areas, climatically and topographically challenging, and lacking in infrastructure and electricity; and (2) the licensee's failure to meet the 35% coverage requirement was due at least in large part to incorrect shapefiles provided by the Commission in its *700 MHz Public Notice* that provided licensees with the templates and market-based boundary files to be used for 700 MHz construction demonstrations.³¹

In that case, the Commission gave the licensee a brief extension of the buildout deadline to

³⁰ RWA would go a little further and suggest that AT&T's decision to exclude CMA316 from the waiver requested in CMA315 was not simply because it was felt to be unnecessary in light of AT&T's belief that it had met the geographic benchmark but also because its ability to do so in CMA316 would undercut its argument that geographic benchmarks are not appropriate for Alaska.

³¹ *Request for Waiver of Interim and Final Geographic Construction Benchmarks for Lower 700 MHz Band A and B Block Licenses WQJQ800 and WQOU674 in American Samoa*, Letter Order, DA 17-1083 (WTB Mobility Div. November 3, 2017) ("Samoa Waiver") at pp. 6-7. In contrast to AT&T's Amended Petition, the waiver petition submitted in American Samoa requested: (i) a *brief* extension of time (less than 90 days) to meet the 35 percent coverage showing, which was granted; and (ii) acceptance of the licensee's *previously submitted buildout showing* based on erroneous maps as demonstrating substantial compliance with the 35 percent geographic buildout requirement, which was granted. The request also asked that the requestor be allowed to meet buildout obligations for the licenses in question using population benchmarks in lieu of geographic benchmarks, *a request which was denied*.

allow it to meet the 35% geographic coverage requirement and accepted its earlier buildout submission as evidencing substantial compliance with the interim buildout requirement. The Commission also refused to allow the licensee to meet its end of term buildout requirement using a population coverage standard, finding that the public interest in enforcing the Commission's buildout policies outweighed the possible loss of license territory in the event the licensee was unable to meet its 70 percent end of term construction benchmark.³² The Commission also found that maintaining the 70 percent final geographic coverage requirement even in a situation where the licensee provided coverage to 90 percent of the population in its market would provide the licensee "with a continued incentive to expand its network and deploy wireless services to the more remote areas that are home to small communities of American Samoans."³³ The Commission's findings in that case are equally applicable to the waiver relief requested by AT&T in the present case. Commission precedent requires that AT&T's waiver request be denied.

III. Conclusion

For the reasons set forth above, the Amended Petition should be denied. The Amended Petition fails to satisfy the criteria for grant of a waiver set forth in Section 1.925. It fails to demonstrate that a waiver would serve the public interest, or that granting a waiver would be consistent with the underlying purpose of the rule. The Petition also fails to demonstrate how enforcing the Commission's performance requirements in this case would be inconsistent with the underlying purpose of the rule. The Bureau's grant of a waiver in these circumstances would establish dangerous precedent which eviscerates and re-writes existing law and would conflict with case precedent and Commission policy. The Amended Petition should therefore be denied.

³² Samoa Waiver at pp. 7-9.

³³ *Id.* at p. 7.

Respectfully submitted,

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April 30, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have on this day of April 30, 2018, served a true copy of the foregoing document by electronic mail upon the following:

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