ORIGINAL

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN 23 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

Broadband PCS C and F Block Installment Payment Issues	)))))	WT Dkt. No. 97-82

COMMENTS OF
GENERAL WIRELESS, INC.

GENERAL WIRELESS, INC.

JAY L. BIRNBAUM
JENNIFER P. BROVEY (Admitted in New York only)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
1440 NEW YORK AVENUE, N.W.
WASHINGTON, DC 20005
(202) 371-7288

Its Attorneys

June 23, 1997

No. of Copies rec'd 0+4
List A B C D E

TABLE OF CONTENTS

SUMMARY

Given the dramatic decline in market value for public PCS companies and recent spectrum auctions, spectrum valuations have reached a point where debt restructuring is essential to enable C block licensees to secure financing. To facilitate such financing, the net cash bid price of the licenses should be discounted to reflect current fair market values for C block licenses. In its June 2 Public Notice, the Commission asked for comments on how to restructure the broadband PCS C block debt, and specifically what type of restructuring would be required to enable C block licensees to pre-pay their debt in its entirety. General Wireless, Inc. ("GWI"), the holder of 14 C block licenses, proposes that the Commission adjust the C block cash bids to the average A/B block bids, which is a reflection of the public capital markets' assessment of the fair market value of broadband PCS licenses. Further, to provide for the pre-payment of C block debt in its entirety, the Commission needs to apply a 14% discount to the restructured fair market value C block bids. This discount would account for the elimination of the value generally attributed to the

Commission's 10-year installment plan by the public and private capital markets.

Alternatively, although GWI strongly prefers the pre-payment proposal, restructured installment debt terms could be offered to licensees as an alternative to pre-payment. GWI submits the three options, each of which should be sufficient to allow C block licensees to finance their business plans since they also would reflect a current FMV valuation of C block licenses based on the adjusted face value of the debt. Finally, the Commission should also modify existing ownership and transfer restrictions imposed on Small Businesses that hamper C block licensees' ability to raise capital.

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

Broadband PCS C and F Block Installment Payment Issues	)	WT Dkt. No. 97-82

COMMENTS OF
GENERAL WIRELESS, INC.

General Wireless, Inc. ("GWI") by its attorneys, hereby submits these comments in response to the June 2, 1997 Public Notice ("Notice") issued by the Wireless Telecommunications Bureau ("Bureau") regarding broadband PCS C and F block installment payment issues. In the Notice, the Bureau seeks comment on proposals on how best to restructure the broadband PCS C and F block debt. As explained below, GWI supports such a restructuring to enable such entities to access the capital necessary to construct and commence build-out of their systems. To do this, the Commission should modify existing C block debt to reflect current C block license fair market values. Specifically, GWI proposes that the Commission (1) adjust the C block bids to the average A/B block bids, which would reflect the fair market value for C block licenses and (2) offer a one-year pre-payment option whereby a discount is provided for the forgone debt financing.

GWI was organized for the purpose of acquiring and operating broadband PCS licenses as a Small Business under the Commission's Designated Entity rules. In the C block auction GWI acquired 14 BTA licenses with an aggregate 1990 population of approximately 17.9 million.[1]

The bidding process undertaken by GWI and other successful bidders in the C block auction was rational, analytical and based on the cash flows of a detailed financial plan. GWI's management team and outside Board members, like those of other C block licensees, include a number of individuals with extensive wireless industry and entrepreneurial experience. GWI's bids were submitted based on thorough demographic analysis, financial projections and consultation with third party financial advisors. The overall bidding in the C block auction was highly competitive and justified by objective business plan and investment criteria.[2] Based on then-existing capital market conditions and numerous consultations with the investment community, GWI reasonably anticipated that additional sources of capital -- both public and

---

1 GWI acquired no F block licenses, and therefore limits its comments in this proceeding to the restructuring of C block debt obligations.

2 *See* Congressional Budget Office Study, "Where Do We Go From here? The FCC Auctions and the Future of Radio Spectrum Management," Apr. 1997 at 19.

private -- would be available to finance the company's start-up costs and debt obligations.[3]

Unfortunately, since the C block auction ended, major changes in the financing environment have rendered most C block licensees unable to obtain the capital needed to fund the launch of their businesses and to service their debt obligations to the Commission. Immediately following the C-block auction and continuing throughout 1996, conditions in the financial markets would have permitted C block financing. But, delays in the grant of licenses for most large C block licensees -- including GWI, whose license grants were delayed until January 27, 1997 due to challenges that the Bureau ultimately rejected in their entirety -- caused these entities to miss the window of opportunity to finance prior to a major drop in public market valuations.[4]

---

[3] For example, GWI obtained a financial commitment from Lucent Technologies, Inc. in the amount of $300 million to fund the purchase and construction of the PCS network subject to certain conditions, including GWI's obtaining additional capital from other sources.

[4] Since the latter half of 1996 and early 1997, public market equity valuations of PCS companies declined as much as 75%, ultimately leading to situations where the value of a typical C block licensee's total "enterprise value" was less than the amount of its debt obligations. *See* Exhibit A. Due to this environment, third party financing sources have not been available to most C block companies. If the Commission were to reject C block debt restructuring, such a rejection would be tantamount to rewarding the meritless, delay tactics of unsuccessful challengers to GWI's applications (and those of other multiple C block license winners) with the very outcome that the Bureau rejected in denying (continued...)

I. DESIGNATED ENTITY RULE CHANGES ARE IN THE PUBLIC INTEREST

Restructuring C block debt to enable existing licensees to finance their businesses would best serve the public interest by promoting the Commission's public policy goals more quickly and completely than a re-auction.

A. Promoting Increased Competition

The Commission's policy objective of increasing competition in the mobile wireless sector is best served by enabling new entrants to offer service quickly. Most if not all existing C block licensees, including GWI, have made substantial progress on network planning, initial design and site identification. Several have begun to acquire equipment and construct their networks. Business plans and management teams are in place to develop the businesses and move expeditiously to commercial launch. Without a restructuring of the rules governing C block debt, however, many of these existing licensees will probably default on their debt obligations, which under existing rules would lead to C block bankruptcies and then require a re-auction of the licenses. But a restructuring of C block debt would enable these licensees to raise the necessary funds to pay for their licenses and swiftly to commence construction and service to the public.[5]

---

[4] (...continued) the petitions to deny, namely a re-auction of the subject licenses.

[5] *See* 47 U.S.C. § 309(j)(3)(A).

In contrast, a re-auction scenario would delay the introduction of new service for several years pending the outcome of Commission grace period proceedings, bankruptcy proceedings, and necessary delays to allow re-auction participants to form themselves, develop business plans, and raise capital.[6] The time required actually to conduct re-auctions and subsequent Commission licensing procedures will further delay commercial operations. The public interest is better served by the Commission's taking pragmatic steps to promote competition by addressing the current problem than by delaying and devoting valuable resources on a re-auction process.

B. Providing for Small Business Participation

Congress directed the Commission to design its spectrum auctions in part to foster small business and entrepreneurial participation.[7] The Commission considered various alternative payment schedules and other methods to assist designated entities to "overcome barriers that have impeded these groups' participation in the telecommunications arena, including barriers related to access to capital."[8] The Commission specifically recognized the impediment that financing

---

6 The initial C block participants took two or more years to do this and the unsuccessful bidders have either disbanded or acquired spectrum in the F block auction.

7 *See* 47 U.S.C. § 309(j)(3)(B).

8 Implementation of Section 309(j) of the Communications Act-Competitive Bidding, Second Report and Order, 9 FCC Rcd 2348, 2389 (1994).

plays in any entity's entry into the telecom arena -- particularly for a small business -- and designed its rules to enable small business C block licensees to overcome this hurdle.

Entrepreneurial companies have contributed significantly to U.S. job growth, productivity and competitiveness. Of equal importance is the introduction of new technology, products and services by entrepreneurial firms and the benefits of these new offerings to the public. Without significant alterations to existing rules regarding debt obligations, the timely implementation of such beneficial entrepreneurial business plans will be further jeopardized.

C. Recovering Value from Auction Sales

The C block auctions were conducted in a manner that was fair and highly competitive, resulting in prices reflecting the then-current present value of the PCS spectrum. But subsequent dramatic changes in the financing environment have impaired the ability of many C block licensees to meet their financial obligations. The prices paid in the D, E and F block auction and the recent WCS auction are clear signals that re-auctions of C block spectrum would result in greatly reduced proceeds. In contrast, the proposed changes to existing C block debt rules will result in greater, near-term cash proceeds to the government than is likely to result from a re-auction.[9]

---

[9] 47 C.F.R. § 309(j)(3)(C).

II. GWI'S PROPOSAL

A. The Commission Should Adjust the C Block Cash Bids to a Current Fair Market Value Equal to the Average A/B Block Bids

Given the dramatic decline in market value for public PCS companies and recent spectrum auctions, spectrum valuations have reached a point where debt restructuring is essential to enable C block licensees to secure financing. To facilitate such financing, the net cash bid price of the licenses should be discounted to reflect current fair market values for C block licenses. In its June 2 Public Notice, the Commission asked for comments on how to restructure the broadband PCS C block debt, and specifically what type of restructuring would be required to enable C block licensees to pre-pay their debt in its entirety. GWI proposes that the Commission adjust the C block cash bids to the average A/B block bids, which is a reflection of the public capital markets' assessment of the fair market value of broadband PCS licenses. Further, to provide for the pre-payment of C block debt in its entirety, the Commission needs to apply a 14% discount to the restructured fair market value C block bids. This discount would account for the elimination of the value generally attributed to the Commission's 10-year installment plan by the public and private capital markets.

1. Adjusting the cash bids

Past "cash only" auction values are an appropriate indicator of fair market value ("FMV"). Since the A/B block auction occurred, a number of licensees have become public companies and their publicly traded stock can be used for determining comparable values.[10] Historic public license enterprise value per pop for comparable publicly traded companies is shown in Exhibit A. Exhibit A indicates that enterprise value per pop generally has declined approximately 50% since the end of the C block auction. After accounting for the reduced valuations applicable to start-up companies and initial public offerings, GWI has been advised that the current public capital markets would support an adjusted debt value of licenses of approximately less than $10/pop.

GWI's proposed restructuring would provide a uniform discount to scale all C block license values to A/B block cash bids. Specifically, $3,860,592,086 (cash bids for average of A/B block)[11] ÷ $10,102,121,395 (net cash bids for C block), or 0.38216, would be the factor that would be applied to the total net cash bids for all C block licenses.

---

10 Examples of these PCS companies whose stocks serve as "comparables" for C Block companies are Omnipoint, InterCel and Aerial Communications, each publicly traded on the NASDAQ exchange.

11 This represents one-half of the total of all A/B block bids and the prices paid by the three A block pioneer's preference winners.

This proposed scaling of C block prices to A/B block prices would be the first step under GWI's proposal and can be stated in the following formula:

Scaling Factor

$$\text{(A)}\quad \text{Scaled Cash Bid} = \text{Actual C block Cash Bid} \times \frac{\text{A/B block Average Cash Bid}}{\text{C block Average Cash Bid}}$$

$$= \text{Actual C block Cash Bid} \times 0.38216$$

Therefore, licensees whose high bids were more than the average C block high bid (*i.e.*, \$40.00/pop) would have their net cash bids restructured to an amount higher than the average of the A/B block bids (*i.e.*, \$15.29/pop), whereas licensees whose high bids were less than the C block average would have their net cash bids restructured to an amount that is less than the A/B block average.[12]

2. Offering a pre-payment option by discounting the debt

Using the A/B block as a FMV reference point and subsequently offering a pre-payment option that includes a discount factor for the absence of the existing financing terms would permit a reduction in the principal to a point where public capital market financing of C block licensees is practical. Application of a commonly used 14% discount rate

[12] The A/B block auction valuation of \$15.29/pop reflects a more favorable result for the government than using the more recent D/E block valuation (\$ 11.14/pop) based on 3x10 MHz equivalent spectrum.

to reflect the cost of debt to similar independent companies results in a discount factor for the C block financing terms of 0.63956. *See* Table I.[13]

Determining the net cash value (*i.e.*, present value) of the financed amount is the second step under the GWI proposal. This can be determined using the following formula:

<u>Pre-Payment Discount Factor</u>

(B)	Net cash value of Financed Amount	=	Scaled Cash Bid	x	Discount Factor (@14% discount rate)
		=	Scaled Cash Bid	x	0.63956

Therefore, applying the discount factor to the average of the A/B block auction of \$15.29/pop produces a net cash value of \$10.33/pop for the average of all the C block licensees (including the 10% down payments previously paid). This would adjust each BTA license price in accordance with the average of the C block to the average of the A/B block.

For example, for General Wireless the calculation would lead to the following result:

---

13 For instance, the proposed public offerings of GWI, NextWave Telecom and Pocket Communications each utilized this 14% discount rate. In Chase Telecom's recently withdrawn private debt offering Chase utilized an even higher 15% discount rate.

Restructured Debt under Pre-Payment Plan

			$/POP	$(000)
1.	Average C-Block Cash Bid	=	59.05	1,059,658
2.	Scaled Cash Bid (A)	=	22.57	404,959
3.	10% Downpayment	=	2.26	40,496
4.	Financed Amount	=	20.31	364,463
5.	Net Cash Value of Financed Amount (B)	=	12.99	233,096
6.	Total Payment Including Downpayment	=	15.25[14]	273,592
7.	Net Cash Amount Owed Government	=	9.34	167,626

Therefore, if the government debt is pre-paid and no government financing is provided, the pre-payment discount will be a key ingredient that allows C block licensees to secure public and/or private financing sources for their license purchases. These financing sources will want the lowest cost basis possible in the value of their license collateral and will charge much higher interest rates than the 10-year U.S. Treasury rates. An important element in securing commercial financing for the pre-payment plan would be the right of creditors to be secured to the full value of the licenses in the event of default after pre-payment to the Commission. An implicit benefit of pre-payment and using the license value as collateral to lenders is the fact that potential creditors will have greater incentive to invest

[14] It should be noted that GWI would be paying in cash essentially the average of the A/B block ($15.29/pop), but would still have the Small Business block ownership restrictions. Specifically, GWI would be paying in cash more per pop than 75% of the A/B block licensees.

because the possibility of a Commission re-auction does not stand to deprive them of the value of their investment.

Once the debt is restructured for a pre-payment plan, the Commission should allow the licensee to pre-pay the loan within a defined period of time. Application of the proposed pre-payment plan for C block licensees would result in total cash proceeds of $2,608,255,000. *See* Table II. To minimize the amount of license financing required and ensure the financing of the C block build-outs, GWI would propose that no interest be required for those entities pre-paying the Commission restructured note in the first 12 to 18 months after restructuring is implemented. Interest could be required on any amount that was not paid off in the first year (*e.g.*, using one-year U. S. Treasury rates) for those licensees whose total payments to the Commission exceed a specified amount (*e.g.*, $300 million). This would enable the great majority of C block licensees to raise capital at FMV prices for their licenses without straining the capacity of public capital markets. Any C block licensee unsuccessful in raising the required pre-payment, once electing the option, could be deemed in default.

This type of restructuring plan would enable the Commission to eliminate its role as creditor and focus on regulatory issues while bringing to a conclusion the uncertainty involving financing. In fact, GWI has received letters from two well-established banks indicating that they are prepared to provide GWI with firm financing commitments for the pre-payment of GWI's outstanding debt to the Commission if the Commission were to adopt GWI's proposal. These letters indicate a clear understanding that GWI in particular, and the C block group in general, would have realistic expectations under GWI's pre-payment plan of raising funds in the public capital markets to pre-pay their license debt and raise funds to finance their businesses. GWI intends to submit these documents, and any future commitments it receives, subject to conditions of confidentiality, to demonstrate the viability of its proposals.

3. <u>The recommended approach is uniform and consistent for all parties of interest</u>

Using an approach that sets FMV at the average of the A/B block auction avoids any implication of unjust enrichment for the C block as a whole. Unlike all other auctions of Narrowband or Broadband PCS spectrum, the C block was held separately and displaced in time from other auctions of similar spectrum. Both narrowband PCS and F block broadband PCS Entrepreneurs auctions were held contemporaneously with those for companies paying cash at the time of license grant. In the case of narrowband PCS, only bidding credits separated entrepreneurs from all other companies and each were allowed to bid on available spectrum. In these aforementioned auctions, more comparable results occurred between Entrepreneurs Block bidders and all other companies.

In the proposal recommended herein, all designated entities would be individually adjusted according to their cash bids so that those licensees that made higher than average cash bids will continue to pay higher than average prices and those that made lower cash bids would end up below the average price for the C block as a whole. Therefore, adjusting the C block prices in this manner recognizes the FMV differential currently impeding the financing of licensees, yet also would reflect the wide disparity in cash bids between the highest and the lowest per pop bidders in the C block auction. *See* Table II.

Finally, many designated entities that quit bidding or exited the C block auction typically were already at net cash bid levels that could not be financed in current public capital markets. For instance, the following bidders who had made a substantial downpayment but exited the C block auction could not likely have financed their companies even if the bidding stopped on their last bid, given they were all within 10% of the final average C block prices that currently cannot be financed:

DE Company	BTA	Final Net Cash Bid/POP
Go	Miami	$58.24
	West Palm Beach	$51.40
	Los Angeles	$41.35
Air Link	West Palm Beach	$39.85
U.S. Airwaves	San Francisco	$36.52
	Philadelphia	$36.43

B. Restructured Installment Debt Terms Could Be Offered as an Alternative to Adjustment of Cash Bids and Debt Pre-Payment

Although GWI strongly prefers the pre-payment proposal, restructured installment debt terms could be offered to licensees as an alternative to pre-payment. The following are three different approaches to restructuring the installment debt terms that would enable licensees to access additional sources of financing:

- Ten Year: Maintain 10-year term of debt, but eliminate interest charges and allow principal to be paid in aggregate at the end of the tenth year.
- Fifteen Year: Increase debt term to 15 years, with no interest charged in the first five years; interest charged at the 10-year U.S. Treasury rate fixed at the end of the fifth year, for the next 10 years; and principal pay-

ment occurring in total at the end of the fifteenth year.[15]

- Twenty Year: Increase the debt term to 20 years, with interest accrued but not paid, for the entire period until the end of the twentieth year, at which time all principal and accrued interest is due. At the end of the first 10 years, the interest rate would be reset at the then-current 10-year UST rate.

Any one of the three options should be sufficient to allow GWI (and, to GWI's knowledge, other C block companies) to finance its business plan since they also would reflect a current FMV valuation of C block licenses based on the adjusted face value of the debt.[16] Thus, these options would involve no adjustment to the actual cash bid price. A prepayment option, however, would provide financing certainty much sooner than an installment payment plan and would eliminate the need for the Commission to continue in its dual role of regulator and creditor.

C. Control Group Requirements

Other rule modifications that would assist in financing for all designated entities would be to permit up to

---

[15] *See* Wireless Telecommunications Bureau Seeks Comment on Broadband PCS C and F Block Installment Payment Issues, Public Notice ["*Notice*"] (June 2, 1997) Appendix E at 17.

[16] *Id.* at 19-20.

49% economic ownership by a single investor and accelerate some provisions of the designated entity rules. Modifications that accelerate designated entity rules would also benefit designated entities in securing financing. Such modifications include:

- reducing the designated entity control group interest to 10% immediately instead of three years from license grant;
- removing the minimum designated entity control group interest (10%) after five years from license grant instead of after ten years; and
- removing the transfer restrictions that apply to designated entities in the event a designated entity is in default to its creditors and files for bankruptcy.

III. RESTRUCTURING THE C BLOCK DEBT ADVANCES THE PUBLIC INTEREST MORE SO THAN RE-AUCTIONING

It is imperative that significant further delays are not incurred so that C block licensees can activate systems and bring commercial services to markets before the existing A/B block carriers become so well entrenched that effective competition is denied to the late entrants. Existing licensees that have secured vendor financing commitments and have already started network planning could have at least some markets in commercial service within 12 months of funding, which could occur shortly after the Commission restructures the debt.

Re-auctioning the licenses rather than restructuring the debt has four major drawbacks:

- A re-auction could delay competitive C block service to the public by three years or more.[17]
- A re-auction is likely to produce lesser incremental revenue than restructuring the existing debt because of the delays that would further depreciate the value of C block licenses. In the proposed approach herein, the incremental amount of revenue due the government ($6.33/pop) is greater than the present value of the F block auction ($5.89/pop) based on a 30 MHz equivalent amount. Given the difficulties small businesses would encounter in raising a "blind pool" of capital for wireless services auctions in today's financial market, coupled with the prospect that the A/B PCS carriers and the A/B digital cellular carriers could have three years or more of an additional head-start (assuming one year for construction), it is very likely a re-auction will produce extremely low revenues for the government.

---

[17] *See supra* pp. 4-5. *See also Notice*, *supra* note 15 at 11-13.

- There is no certainty that future auctions will be "trouble free" in the sense that all entrepreneurs will be able to meet their installment payment obligations.
- There could also be problems of timing a C block re-auction, with other spectrum coming to auction, that could delay C block competition even longer.

IV. CONCLUSION

For the foregoing reasons, GWI supports the restructuring of the C block debt as set forth above.

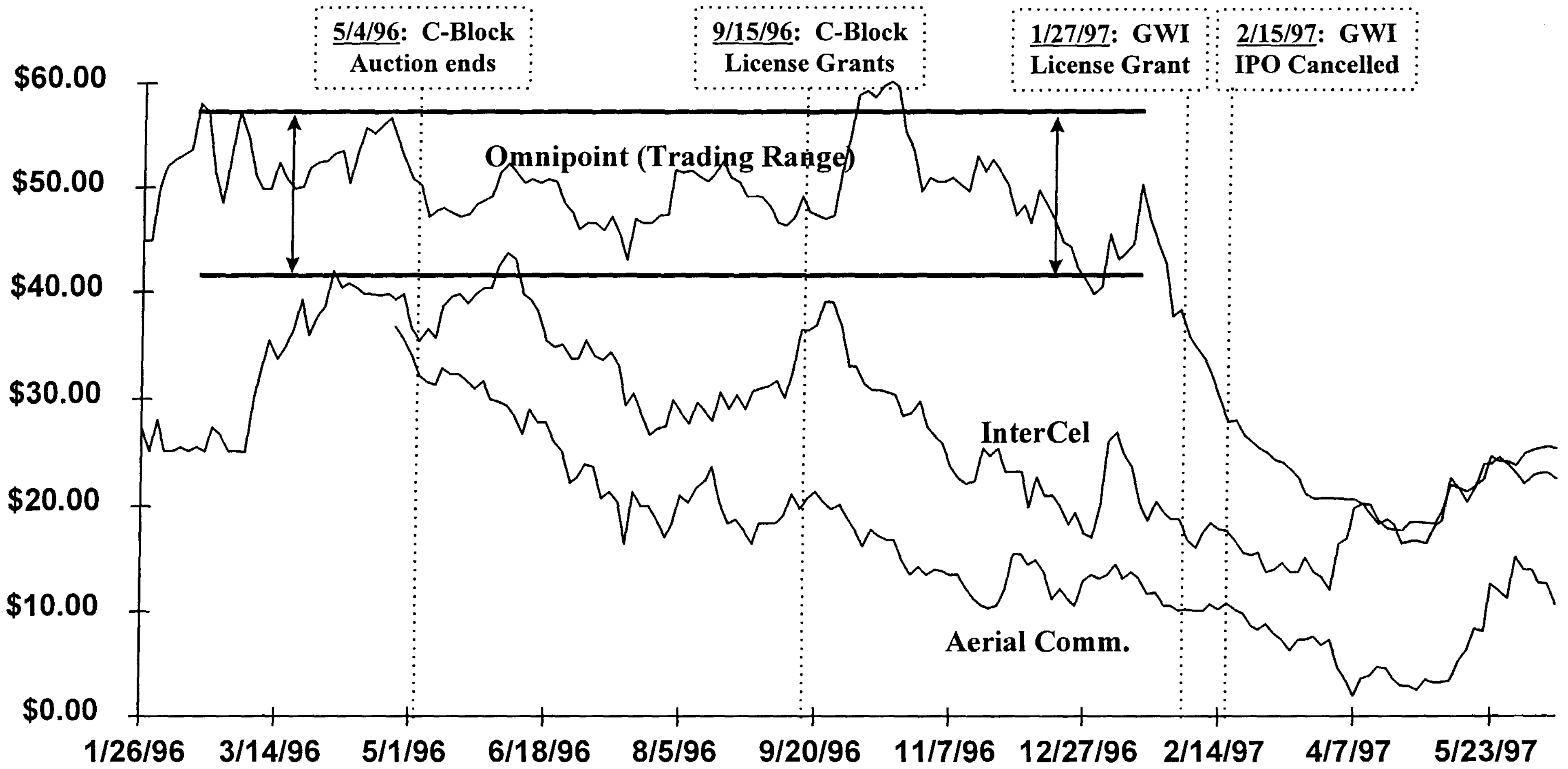
Respectfully submitted,
General Wireless, Inc.

Jay L. Birnbaum
Jennifer P. Brovey (Admitted in New York only)
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, NW
Washington, DC 20005
(202) 371-7288

Its Attorneys

June 23, 1997

Exhibit A
Public Market Enterprise Valuation
($ per POP)



General WIRELESS

Table I

C-Block

Net Present Value of Government Installment Loan (Quarterly Payments, 6-Year Interest Only, 4-Year Amortization)

		C-Block Payment Terms					
		10.0% Down Payment	Debt Outstanding	Principal Repayment	Interest Payment @ 6.5%	Total Payments	NPV of Total Payments @ 14.0%
1997	Jan		$9,064,538				
	Apr	0	9,064,538	0	147,299	147,299	142,318
	Jul	0	9,064,538	0	147,299	147,299	137,505
	Oct	0	9,064,538	0	147,299	147,299	132,855
1998	Jan	0	9,064,538	0	147,299	147,299	128,362
	Apr	0	9,064,538	0	147,299	147,299	124,022
	Jul	0	9,064,538	0	147,299	147,299	119,828
	Oct	0	9,064,538	0	147,299	147,299	115,775
1999	Jan	0	9,064,538	0	147,299	147,299	111,860
	Apr	0	9,064,538	0	147,299	147,299	108,078
	Jul	0	9,064,538	0	147,299	147,299	104,423
	Oct	0	9,064,538	0	147,299	147,299	100,892
2000	Jan	0	9,064,538	0	147,299	147,299	97,480
	Apr	0	9,064,538	0	147,299	147,299	94,183
	Jul	0	9,064,538	0	147,299	147,299	90,998
	Oct	0	9,064,538	0	147,299	147,299	87,921
2001	Jan	0	9,064,538	0	147,299	147,299	84,948
	Apr	0	9,064,538	0	147,299	147,299	82,075
	Jul	0	9,064,538	0	147,299	147,299	79,300
	Oct	0	9,064,538	0	147,299	147,299	76,618
2002	Jan	0	9,064,538	0	147,299	147,299	74,027
	Apr	0	9,064,538	0	147,299	147,299	71,524
	Jul	0	9,064,538	0	147,299	147,299	69,105
	Oct	0	9,064,538	0	147,299	147,299	66,768
2003	Jan	0	9,064,538	0	147,299	147,299	64,511
	Apr	0	8,563,901	500,637	147,299	647,936	274,172
	Jul	0	8,055,128	508,773	139,163	647,936	264,901
	Oct	0	7,538,088	517,040	130,896	647,936	255,943
2004	Jan	0	7,012,646	525,442	122,494	647,936	247,288
	Apr	0	6,478,665	533,981	113,955	647,936	238,925
	Jul	0	5,936,008	542,658	105,278	647,936	230,846
	Oct	0	5,384,532	551,476	96,460	647,936	223,039
2005	Jan	0	4,824,094	560,437	87,499	647,936	215,497
	Apr	0	4,254,550	569,545	78,392	647,936	208,210
	Jul	0	3,675,750	578,800	69,136	647,936	201,169
	Oct	0	3,087,545	588,205	59,731	647,936	194,366
2006	Jan	0	2,489,782	597,763	50,173	647,936	187,793
	Apr	0	1,882,305	607,477	40,459	647,936	181,443
	Jul	0	1,264,956	617,349	30,587	647,936	175,307
	Oct	0	637,575	627,381	20,556	647,936	169,379
2007	Jan	0	0	637,575	10,361	647,936	163,651
	Total	$0		$9,064,538	$4,837,608	$13,902,146	$5,797,303 63.95586% of face