

Connect America Phase II Challenge Process Form

OMB Control Number 3060-1188

FCC Form 505

Filing Entity: Custer Telephone Broadband Services LLC.

FRN (if applicable): 0019420371

Name of Person Filling Out Form: Salvatore Taillefer, Jr.

Mailing Address of Person Filling Out Form: 2120 L Street NW, Suite 300

Email Address of Person Filling Out Form: [sta@bloostonlaw.com](mailto:sta@bloostonlaw.com)

Phone Number of Person Filling Out Form: 202-828-5562

Name of Person Certifying Data within Form: Dennis Thornock

Mailing Address of Person Certifying Data within Form: P.O. Box 324, Challis, Idaho, 83226

Email Address of Person Certifying Data within Form: [dennis@custertel.net](mailto:dennis@custertel.net)

Phone Number of Person Certifying Data within Form: 208-879-2281

Response to Challenge

Census Block 15 Digit FIPS Code	State	Name of Entity Making Initial Challenge	FRN of Entity Making Initial Challenge (if provided)	Insert 'X' if Speed Criteria is at Issue	Insert 'X' if Usage Allowance Criteria is at Issue	Insert 'X' if Latency Criteria is at Issue	Insert 'X' if Price Criteria is at Issue	Insert 'X' if Voice Criteria is at Issue	Type of Supporting Evidence	Additional Comments	OMB Control Number 3060-1188
160599701001677	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map		
160599701002000	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599701002038	ID	CenturyLink						X	Advertisements; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599702001064	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599702001075	ID	CenturyLink						X	Advertisements; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599702001077	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599702002193	ID	CenturyLink						X	Advertisements; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599702002252	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map		
160599702002268	ID	CenturyLink						X	Advertisements; Declaration of Dennis Thornock; Propagation Map; Request for Waiver		
160599702002269	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map		
160599702002270	ID	CenturyLink						X	Advertisements; Customer Record Summary; Declaration of Dennis Thornock; Propagation Map		

Certifications and Additional Information

OMB Control Number 3060-1188

**Accuracy and Due Diligence Certification**

*All Filers Must Fill Out*

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials:

*DLZ*

Date: 6-Nov-14

**Notice of Challenge Certification**

*(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)*

**Service of Notice Successful**

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials:

Date:

**Service of Notice Unsuccessful**

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties  
that Could Not Be

Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

*Attachment 1*

**Declaration of Dennis Thornock**

### **Declaration of Dennis Thornock**

I, Dennis Thornock, declare as follows:

1. I am the President and General Manager of Custer Telephone Broadband Services, LLC (“the Company”). My responsibilities include oversight of most of the Company’s business, including day-to-day operations, marketing, sales, hiring, executive planning, and execution.
2. I personally directed and oversaw the preparation of the information provided in the Company’s response, as described herein. I therefore have personal knowledge of the facts and information presented.
3. The Company does not receive universal service support.
4. Through discussions with the Company’s engineering department, Plant Manager, and Internet Operations Supervisor, I have verified that the Company offers both voice and broadband service within the eleven (11) census blocks challenged as unserved by CenturyLink, and that the Company’s broadband service offering is at least 4 Mbps downstream and 1 Mbps upstream with a network latency of less than 100 ms.
5. As demonstrated by the attached advertisements, the Company holds itself out as offering, and is willing to actually provide, service in the challenged census blocks at rates that are competitive with urban rates.
6. As demonstrated by the attached network propagation map, the Company has voice and broadband-capable facilities in or adjacent to the challenged blocks, and is capable of providing service in those blocks.
7. As demonstrated by the attached redacted customer list, the Company currently has, or has had in the past, at least one voice and/or broadband customer in four (4) of the challenged blocks. The Company has chosen to provide the redacted list in lieu of the actual customer bills

on record to avoid the CPNI concerns voiced by the Bureau in the Rural Broadband Experiments FAQ.

8. Although it has no voice or broadband customers in the other seven (7) blocks, the Company does have cable television customers in three (3), and the Company is willing and able to provide voice and broadband service in all seven blocks upon request. These blocks are very sparsely populated – one block has no residential structures and four have only one residential structure. The Commission recognized in the initial challenge phase of this proceeding that low population density can affect subscription rates. For this reason, the Company has respectfully requested, in a separate document, a waiver of the customer requirement for these blocks on those grounds.

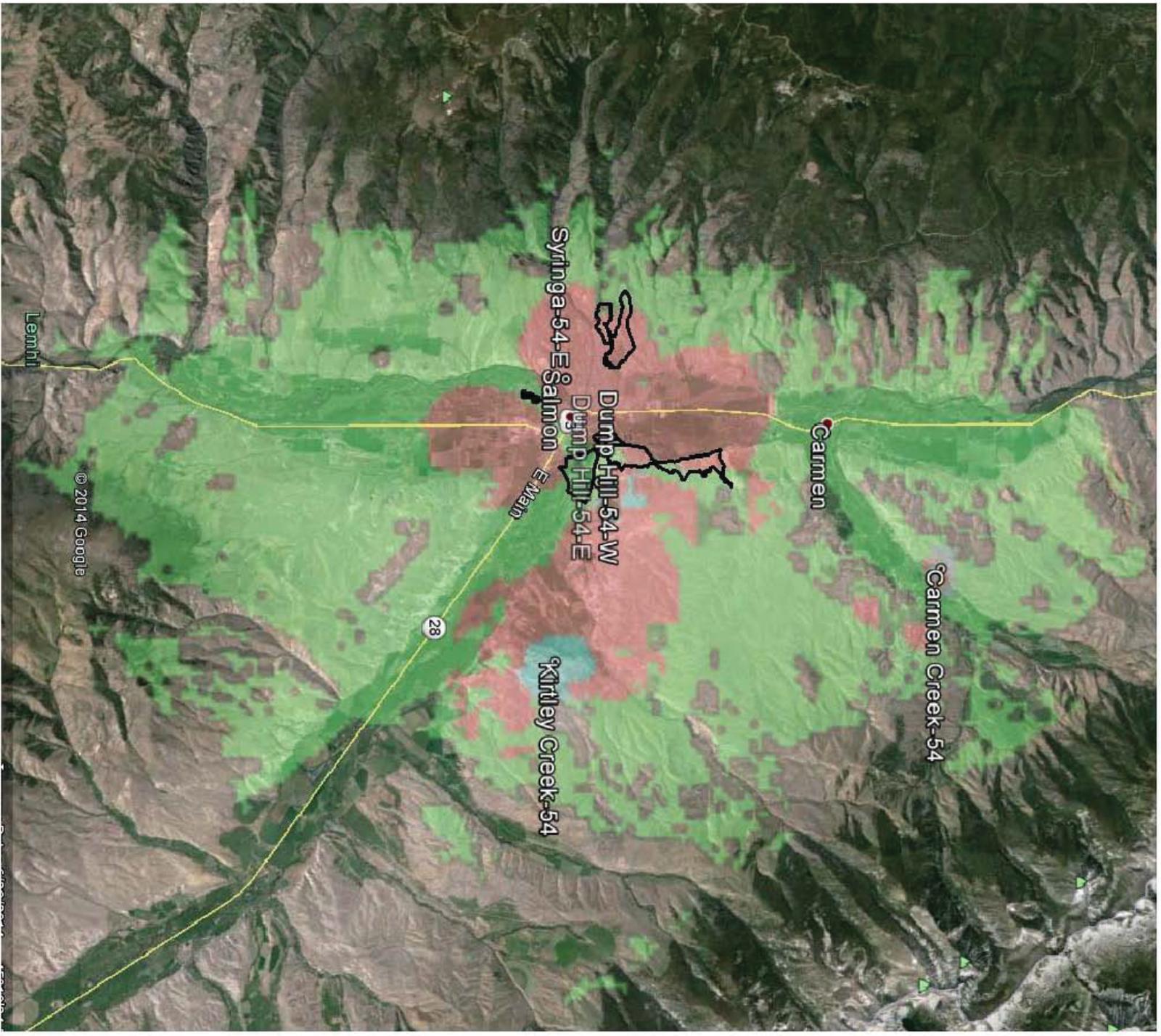
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in blue ink that reads "Dennis F. Thorbeck". The signature is written in a cursive style with a large, stylized initial "D".

Dennis Thorbeck

Dated: November 6, 2014

*Attachment 2*  
*Propagation Map*



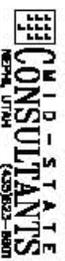
Blue: -67dBm or greater  
 Red: -77dBm or greater  
 Green: -85dBm or greater  
 Black: Census Blocks

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### SALMON WIRELESS COVERAGE AREA

EXCHANGE:	SCALE:	NTS
CO: LEMHI	FILE:	WIRELESS AREA

Prepared by


 CMIR-STATE  
 CONSULTANTS  
WESTERN, UTM  
(435)923-3800

**CTCI**  
 Custer Telephone  
 Cooperative, Inc.

## *Attachment 3*

### *Advertisements*

# **Custer Telephone Broadband Services, LLC**

## **Telephone Service**

### **in the Salmon Area where Available**

**Please call 208-756-4111 for details**

CTBS Residential Line	
Features	No Contract
Phone Price	\$14.00
Additional Fees	Listed Below
Basic Voice Mail	Included
4 Additional Custom Calling Features	Included
Total Price (Includes additional fees)	\$23.64

**Residential - Federal, State and Local Additional Fees**

<b>Idaho Telephone Service Assistance Program (ITSAP)</b>	<b>\$0.03</b>
<b>Idaho Universal Service Fund (ID USF)</b>	<b>\$0.16</b>
<b>Lemhi County 911 Fee</b>	<b>\$1.25</b>
<b>Network Access Fee</b>	<b>\$6.50</b>
<b>Federal Excise Tax</b>	<b>\$0.65</b>
<b>Federal Universal Service Charge</b>	<b>\$1.05</b>

Residential Long Distance options are:  
 Unlimited Long Distance \$27/mo Single line, \$20/mo each Additional line  
 -OR-  
 Per Minute at \$0.10/minute. Paper detailed billing included.

**Online detailed Long Distance billing included.  
 Paper detailed Long Distance billing - \$5.00/month on Unlimited Plan.**

Unlimited Long Distance applies only within the Continental United States.

CTBS Business Line	
Features	No Contract
Phone Price	\$18.00
Additional Fees	Listed Below
Basic Voice Mail	Included
4 Additional Custom Calling Features	Included
Total Price - Single Line (includes additional fees)	\$27.85
Total Price - Multi Line (includes additional fees)	\$31.07

**Business - Federal, State and Local Additional Fees**

Idaho Telephone Service Assistance Program (ITSAP)	\$0.03
Idaho Universal Service Fund (ID USF)	\$0.25
Lemhi County 911 Fee	\$1.25
Network Access Fee	Single \$6.50/Multi \$9.20
Federal Excise Tax	Single \$0.77/Multi \$0.86
Federal Universal Service Charge	Single \$1.05/Multi \$1.48

Business Long Distance options are:  
Unlimited Long Distance \$27/mo Single line, \$20/mo each Additional line  
-OR-  
Per Minute at \$0.10/minute. Paper detailed billing included.

**Online detailed Long Distance billing included.  
Paper detailed Long Distance billing - \$5.00/month on Unlimited Plan.**

Unlimited Long Distance applies only within the Continental United States.

[Click here to view CPNI Policy](#)

[Click here to view CLEC Tariff \(Competitive Local Exchange Carrier\)](#)

# Custer Telephone Broadband Services, LLC

## New Packages

**in the Salmon Area where Available**

**Please call 208-756-4111 for details**

CTBS Residential 4 Mb Package		
Features	1-Year Term	2-Year Term
Internet Download Speed	4Mbps	4Mbps
Internet Upload Speed	1Mbps	1Mbps
Internet Price	\$39.95	\$34.95
Phone Price	\$14.00	\$14.00
Additional Fees	Listed Below	Listed Below
Unlimited Nationwide Long Distance*	\$10.00	\$10.00
Modem Included	Yes	Yes
WiFi Device Included	No	Yes
Promo	No	1 Month Free Internet
Activation Fee	No	No
Total Package Price	\$63.95	\$58.95

CTBS Residential 6 Mb Package		
Features	1-Year Term	2-Year Term
Internet Download Speed	6Mbps	6Mbps
Internet Upload Speed	1Mbps	1Mbps
Internet Price	\$49.95	\$44.95
Phone Price	\$14.00	\$14.00
Additional Fees	Listed Below	Listed Below
Unlimited Nationwide Long Distance*	\$10.00	\$10.00
Modem Included	Yes	Yes
WiFi Device Included	No	Yes
Promo	No	1 Month Free Internet
Activation Fee	No	No
Total Package Price	\$73.95	\$68.95

CTBS Residential 10 Mb Package		
Features	1-Year Term	2-Year Term
Internet Download Speed	10Mbps	10Mbps
Internet Upload Speed	1Mbps	1Mbps
Internet Price	\$69.95	\$56.95
Phone Price	\$14.00	\$14.00

<b>Features</b>	<b>1-Year Term</b>	<b>2-Year Term</b>
Additional Fees	Listed Below	Listed Below
Unlimited Nationwide Long Distance*	\$10.00	\$10.00
Modem Included	Yes	Yes
WiFi Device Included	No	Yes
Promo	No	1 Month Free Internet
Activation Fee	No	No
Total Package Price	\$93.95	\$80.95

**Residential - Federal, State and Local Additional Fees**

<b>Idaho Telephone Service Assistance Program (ITSAP)</b>	<b>\$0.03</b>
<b>Idaho Universal Service Fund (ID USF)</b>	<b>\$0.16</b>
<b>Lemhi County 911 Fee</b>	<b>\$1.25</b>
<b>Network Access Fee</b>	<b>\$6.50</b>
<b>Federal Excise Tax</b>	<b>\$0.23</b>
<b>Federal Universal Service Charge</b>	<b>\$1.05</b>

<b>CTBS Business 4 Mb Package</b>		
<b>Features</b>	<b>1-Year Term</b>	<b>2-Year Term</b>
Internet Download Speed	4Mbps	4Mbps
Internet Upload Speed	1Mbps	1Mbps
Internet Price	\$39.95	\$34.95
Phone Price	\$18.00	\$18.00
Additional Fees	Listed Below	Listed Below
Unlimited Nationwide Long Distance*	\$20.00	\$20.00
Modem Included	Yes	Yes
WiFi Device Included	No	Yes
Promo	No	1 Month Free Internet
Activation Fee	No	No
Total Package Price	\$77.95	\$72.95

<b>CTBS Business 6 Mb Package</b>		
<b>Features</b>	<b>1-Year Term</b>	<b>2-Year Term</b>
Internet Download Speed	6Mbps	6Mbps
Internet Upload Speed	1Mbps	1Mbps
Internet Price	\$49.95	\$44.95
Phone Price	\$18.00	\$18.00
Additional Fees	Listed Below	Listed Below
Unlimited Nationwide Long Distance*	\$20.00	\$20.00
Modem Included	Yes	Yes
WiFi Device Included	No	Yes
Promo	No	1 Month Free Internet
Activation Fee	No	No
Total Package Price	\$87.95	\$82.95

CTBS Business 10 Mb Package		
Features	1-Year Term	2-Year Term
Internet Download Speed	10Mbps	10Mbps
Internet Upload Speed	1Mbps	1Mbps
Internet Price	\$69.95	\$56.95
Phone Price	\$18.00	\$18.00
Additional Fees	Listed Below	Listed Below
Unlimited Nationwide Long Distance*	\$20.00	\$20.00
Modem Included	Yes	Yes
WiFi Device Included	No	Yes
Promo	No	1 Month Free Internet
Activation Fee	No	No
Total Package Price	\$107.95	\$94.95

**Business - Federal, State and Local Additional Fees**

Idaho Telephone Service Assistance Program (ITSAP)	\$0.03
Idaho Universal Service Fund (ID USF)	\$0.25
Lemhi County 911 Fee	\$1.25
Network Access Fee	Single \$6.50/Multi \$9.20
Federal Excise Tax	Single \$0.23/Multi \$0.32
Federal Universal Service Charge	Single \$1.05/Multi \$1.48

\*Online detailed Long Distance billing included.  
Paper detailed Long Distance billing - \$5.00/month.

**Unlimited Long Distance applies only within the Continental United States.**

Calls placed outside the Continental United States will be billed on a per minute rate in addition to the Package Price.

**All above pricing is based on Internet/Phone packages. Prices for stand alone services are not reflected on this sheet.**

All customers have 30 days from date of activation of service to opt out of any agreement.

**Early Termination Penalties will apply upon failure to fulfill package plan agreement term.**

[Click here to view Broadband Internet Access Services Network Management Practices, Performance Characteristics, and Commercial Terms and Conditions for Fixed Services](#)

[Click here to view CPNI Policy](#)

[Click here to view Internet Terms and Conditions of Service](#)

[Click here to view CLEC Tariff \(Competitive Local Exchange Carrier\)](#)

# High Speed Internet

Please call 866-879-2281 for details

High Speed Internet Packages				
Package	Downstream Speed	Upstream Speed	Monthly Price	Promotion
512Kb	512Kbps	128Kbps	\$24.95	1 Month Free
2Mb	2Mb	512Kbps	\$34.95	1 Month Free
4Mb	4Mb	1Mbps	\$59.95	1 Month Free
6Mb	6Mb	1Mbps	\$74.95	1 Month Free
5Mb x 5Mb	5Mb	5Mb	\$89.95	1 Month Free
10Mb	10Mb	1Mbps	\$99.95	1 Month Free
15Mb	15Mb	1Mbps	\$159.95	1 Month Free
50Mb	50Mb	10Mbps	\$279.95	1 Month Free

Term Agreements				
Contract	Setup Fee	Modem	Promotion	
Month to Month	\$125.95	Included	N/A	
1 Year Term	\$55.95	Included	One Month Free	
2 Year Term	\$0.00	Included	One Month Free	

Recommended Minimum Requirements	
	1 GHz
	1 GB RAM
	Windows XP or Mac 10.x or Higher
	Network Card OR USB Port

All Packages include Virus and Junk Email blocking services.

Network Reconfiguration Charge - \$40 will be charged for physical address changes and downgrading monthly price of HSI packages.

Not all plans are available in all areas. Inquire for details.

Seasonal Service requires a minimum of 90 days of active service and is \$9.00 per month while on vacation.

Downgrades - High Speed Internet Packages may be downgraded after 3 months of service on the same agreement with a \$40 network reconfig fee.

Setup Fee penalty is a proration of \$125.95 less the Setup Fee paid initially.

Speeds above are not guaranteed, and actual speeds may vary due to line condition and/or Internet traffic.

Upgrades - High Speed Internet Packages may be upgraded in price at any time with no charge on the same agreement but promotions do not apply.

CTCI also sells and maintains wireless routers, cabled routers, access points and networking services to meet all of your networking needs. Plans and Service types available may vary depending on physical location.

Approved Credit – If customer does not have established and / or approved credit in accordance with company policy, a setup fee deposit (\$125.95) and / or modem deposit (\$75) may be required.

When signing a 12-month agreement the following applies: I agree to purchase High Speed Internet service from Custer Telephone Internet Services for 12 consecutive months and that \$70.00 of the \$125.95 installation fee will be waived. I will also receive one month of free service for which ever plan I choose. If I terminate my High Speed Internet service prior to fulfilling my agreement, I agree to pay the remaining prorated amount of my \$70.00 installation fee plus the first free month that I received as part of this promotion.

When signing a 24-month agreement the following applies: I agree to purchase High Speed Internet service from Custer Telephone Internet Services for 24 consecutive months and that the \$125.95 installation fee will be waived. I will also receive one month of free service for which ever plan I choose. If I terminate my High Speed Internet service prior to fulfilling my agreement, I agree to pay the remaining prorated amount of my \$125.95 installation fee plus the first free month that I received as part of this promotion.

[Click here to view Broadband Internet Access Services Network Management Practices, Performance Characteristics, and Commercial Terms and Conditions for Fixed Services](#)

[Click here to view CPNI Policy](#)

[Click here to view Internet Terms and Conditions of Service](#)

Attachment 4

Customer Record Summary

(REDACTED)

## Custer Telephone Broadband Services, LLC

### Customer Record Summary

Customer Name	Customer Address	Customer Number	Service Type	Census Block	Notes
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599701001677	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599701001677	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599701001677	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599702002252	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599702002252	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599702002269	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	160599702002270	

**Attachment 5**  
**Request for Waiver**

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

In the Matter of )  
)  
Connect America Fund Phase II Challenge ) WC Docket No. 14-93  
Process Subject Matter ) )  
)  
Replies Sought in Connect America Phase II ) DA 14-1397  
Challenge Process ) )  
)

**REQUEST FOR LIMITED WAIVER OF  
CONNECT AMERICA FUND PHASE II EVIDENTIARY REQUIREMENT**

Custer Telephone Broadband Services, LLC (“the Company”), by its attorney and pursuant to Section 1.3 of the Commission’s Rules,<sup>1</sup> requests a limited waiver of the Wireline Competition Bureau’s (“Bureau”) evidentiary requirement that parties challenging or responding to challenges must produce evidence of current or former customers in a census block in order to establish that the block is “served” for the purpose of determining whether it is available for Connect America Fund (“CAF”) Phase II support.

In the Company’s case, several census blocks in which the Company makes service available do not have, and have not had, customers because the population density of the block is so low as to make service opportunities rare. Since the Company is presently capable of providing service to anyone requesting it in these blocks, making them available for CAF Phase II support would undermine the Commission’s determination that CAF funding should not be used to overbuild existing unsubsidized

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<sup>1</sup> 47 C.F.R. 1.3.

infrastructure. Accordingly, the Company seeks a waiver of the customer requirement because these blocks are nevertheless “served.”

### **Factual Background**

The Company is an unsubsidized rural voice and broadband provider that serves approximately 1223 customers in rural Idaho. CenturyLink has challenged the existence of voice service offerings by the Company in certain census blocks as part of the Connect America Phase II Challenge Process initiated by the Commission. As demonstrated in the Company’s response to CenturyLink’s challenge, the Company has deployed physical network plant assets capable of providing voice service (as well as broadband service meeting the Commission’s requirements) throughout these blocks, and has current customers in many. However, although all of the blocks in question have access to service, not all blocks have current or former customers. This is because most of these blocks have very low population density; indeed, of the 7 blocks in which the Company has no customers, one block has no residential structures and four blocks have only one residential structure. As a result, these blocks have no subscribers even though service is readily available.

### **Good Cause Exists for Waiver of the Customer Requirement**

Section 1.3 of the Rules permits the Commission’s rules to be waived for good cause shown. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.<sup>2</sup> In addition,

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<sup>2</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

the Commission may take into account considerations of hardship, equity, and the effective implementation of public policy on an individual basis.<sup>3</sup>

The Bureau waived the customer requirement several times in the initial round of the Connect America Phase II Challenge Process.<sup>4</sup> In so doing, the Bureau explicitly recognized that the public interest would be served in waiving the requirement in circumstances such as these, where, “low population density . . . explains[s] the lack of a current or former customer.”<sup>5</sup>

In the *USF/ICC Transformation Order* of 2011, the Commission determined that funding should not be directed to areas where unsubsidized competitors offer service.<sup>6</sup> The rationale for this finding was a policy determination that CAF support should only be directed to areas where market forces have not provided sufficient incentives to deploy broadband already. In the Commission’s own words, “[w]e cannot and will not condone new investment subsidized by universal service funds to occur in areas that are already served by marketplace forces...”<sup>7</sup> Further, subsidizing the deployment of facilities in areas where unsubsidized providers have already done so undermines competition and chills investment.

Good cause exists for the requested waiver because, as in the case of previous waivers, the lack of a customer or former customer is explained by the circumstances, and is not indicative of a lack of service. The census blocks in question are very rural areas with very low population density per census block, and as a result the number of

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<sup>3</sup> *WATT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), cert. denied, 409 U.S. 1027 (1972).

<sup>4</sup> Public Notice, *Replies Sought in Connect America Phase II Challenge Process* WC Docket No. 10-90 and 14-93, DA 14-1397 (released September 26, 2014) at pages 3-4.

<sup>5</sup> *Id.* at pages 3-4.

<sup>6</sup> *In re Connect Am. Fund, Universal Service Reform – Mobility Fund et al.*, 26 FCC Rcd 17663, 17729 (F.C.C. 2011).

<sup>7</sup> *In re Connect Am. Fund, Universal Service Reform – Mobility Fund et al.*, 29 FCC Rcd 7051, 7073 (F.C.C. 2014).

potential customers is similarly low. Indeed, census block 160599702002268 has no residential structures at all, and census blocks 160599702002193, 160599702001064, 160599702001077, and 160599702001075 only have one each. The Commission's stated goal with CAF is to extend service to areas that do not have it. In the case where a census block currently has only one potential customer, the fact that the customer has not chosen to subscribe to a readily available service offering should not be considered indicative of a lack of service.

### **Conclusion**

Good cause, as well as considerations equity and the effective implementation of the Commission's universal service policies, warrant grant of the Company's requested waiver of the customer requirement. The requested waiver is consistent with Commission and Bureau precedent, and is supported by the facts of the situation.

Respectfully submitted,

**CUSTER TELEPHONE  
BROADBAND SERVICE, LLC**

By:



Benjamin H. Dickens, Jr.  
Salvatore Taillefer, Jr.

Blooston, Mordkofsky, Dickens,  
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Its Attorneys

Dated: November 7, 2014