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

In the Matter of	)	EB DOCKET NO. 00-156
	)	
Ronald Brasher	)	
Licensee of Private Land Mobile Stations	)	
WPLQ202, KCG967, WPLD495,WPKH771,	)	
WPKI739, WPKI733, WPKI707, WIL990,	)	
WPLQ475, WPLY658, WPKY903, WPKY901,	)	
WPLZ533, WPKI762, and WPDU262	)	
Dallas/Fort Worth, Texas	)	
	)	
Patricia Brasher	)	
Licensee of Private Land Mobile Stations	)	
WPJI362, WPKY900, and WPLD570	)	
Dallas/Fort Worth, Texas	)	
	)	
David Brasher	)	
Licensee of Private Land Mobile Stations	)	
WPBU651 and WPJR757	)	
Dallas/Fort Worth, Texas	)	
	)	
D.L. Brasher	)	
Licensee of Private Land Mobile Station WPJR750	)	
Dallas/Fort Worth, Texas	)	
	)	
Carolyn S. Lutz	)	
Licensee of Private Land Mobile Station WPJR763	)	
Dallas/Fort Worth, Texas	)	
	)	
O.C. Brasher	)	
Licensee of Private Land Mobile Station WPJR761	)	
Dallas/Fort Worth, Texas	)	
	)	
Jim Sumpter	)	
Licensee of Private Land Mobile Station WPJR725	)	
Dallas/Fort Worth, Texas	)	
	)	
Norma Sumpter	)	
Licensee of Private Land Mobile Station WPJR739	)	
Dallas/Fort Worth, Texas	)	
	)	
Melissa Sumpter	)	
Licensee of Private Land Mobile Station WPJS437	)	
Dallas/Fort Worth, Texas	)	
	)	
Jennifer Hill	)	
Licensee of Private Land Mobile Station WPJR740	)	
Dallas/Fort Worth, Texas	)	

Metroplex Two-Way Radio Service Licensee of Private Land Mobile Stations WPHS735, WPKP673, WPKM797, WPLZ841 and WPJR754 Dallas/Fort Worth, Texas	)	
DLB Enterprises, Inc. Licensee of Private Land Mobile Stations WPKM796, WPKL830, WPJY510, WPLU490, WPBH830, WPKP667, WPLY713, WPMH354, WPMH477, and WPKY978, Dallas/Fort Worth, Texas WNAH223 Cleora ,Oklahoma	)	
DLB Enterprises, Inc., Applicant for Conventional Industrial/Business Private Land Mobile Licenses Dallas, Texas	)	File Nos. AO17774, AO20241 and AO19157
Applicant for Conventional Industrial/Business Private Land Mobile Licenses Crowley, Texas	)	File No. AO18555.
Applicant for Trunked Industrial/Business Private Land Mobile Licenses Crowley, Texas	)	File No. AO20755.
Applicant for Assignment of Private Land Mobile Station WPJR740 from Jennifer Hill Dallas, Texas	)	File No. D110637
Applicant for Assignment of Private Land Mobile Stations from Ronald Brasher (WPKI707, WPKI739, WPKI733 and WPLQ475), Norma Sumpter (WPJR739), D.L. Brasher (WPJR750), David Brasher (WPJR757), Jim Sumpter (WPJR725), Jennifer Hill (WPJR740), Metroplex Two-Way Radio Service (WPJR754), O.C. Brasher (WPJR761), Melissa Sumpter (WPJS437) Dallas, Texas	)	File No. D113240
Applicant for Assignment of Private Land Mobile Station	)	File No. D113242
Applicant for Modification of Private Land Mobile Stations WPKM796, and WPKL830, and Assignment of Private Land Mobile Stations WPKI733, WPLQ475, WPKI707 and WPKI739 from Ronald Brasher and Assignment of Private Land Mobile Station WPKM797 from Metroplex Dallas, Texas	)	File No. D113241

ORDER TO SHOW CAUSE, HEARING DESIGNATION ORDER AND NOTICE OF OPPORTUNITY FOR HEARING

Adopted: August 23, 2000 **Released: August 29, 2000**

By the Commission:

I. INTRODUCTION

1. In this Order, we commence a hearing proceeding to determine whether the above-captioned licenses should be revoked; whether the above-captioned applications should be granted; and whether forfeitures should be imposed on one or more of the captioned entities. The record before us suggests that Ronald and Patricia Brasher, with the assistance of David Brasher, Diane Brasher and Carolyn Lutz (collectively, the "Brashers"), may have submitted fraudulent applications to the Commission in the name of deceased persons, as well as in the name of persons who had no knowledge of, or involvement in, the applications. We also have evidence that some or all of the above-captioned licensees may have misrepresented facts to, or lacked candor with, the Commission and abused the Commission's processes. Accordingly, we are commencing a proceeding to determine the extent to which each captioned licensee has violated the Commission's rules and to determine whether the above-captioned licensees are qualified to remain or become Commission licensees.

II. BACKGROUND

2. The captioned entities are, or seek to become, private land mobile licensees. The Brashers operate DLB, a business utilizing the captioned two-way private carrier and commercial land mobile radio service stations. DLB, doing business as Metroplex, offers subscription two-way radio service to customers on these stations, a number of which are operated together as a trunked system. On May 17, 1997, Net Wave Communications, Inc. ("Net Wave") filed a *Petition For Order To Show Cause* ("*Petition*") with the Commission alleging, *inter alia*, that the captioned licensees had misrepresented facts to the Commission and had engaged in unauthorized transfers of control. In response to Net Wave's petition, Commission staff commenced an investigation.[1] The staff's investigation revealed that Ronald Brasher, on behalf of DLB, intended to construct and to operate a large radio system. The frequency coordinator, Personal Communications Industry Association, Ltd. ("PCIA"), told him that it was PCIA/FCC policy not to coordinate more than five channels per site, per license. As a consequence, according to Ronald Brasher, he sought others who might obtain licenses for stations that he could manage. Jim Sumpter, Norma Sumpter, and Jennifer Hill have declared that Ron Brasher told them that he wanted them to obtain licenses, which they would then assign to him, because he could not submit additional license applications in his own name.

3. All of the above-captioned licensees or applicants are related to and/or otherwise connected with Ronald and Patricia Brasher. In this regard, David Brasher, also known as D.L.

[1] The Commission does not recognize a formal right to seek revocation of a license. *See, e.g., Danbury Cellular Telephone Company, Inc.*, 6 FCC Rcd 4186, 4188 n.2 (CCB 1991). The Commission, however, has treated such requests as informal requests for action pursuant to Section 1.41 of the Commission's Rules, 47 CFR §1.41. In this case, the Petition was treated as an informal complaint. An investigation was initiated to investigate the allegations made in the Petition. This Order is based, not upon the Petition, but upon the results of the Bureau's investigation and, unless otherwise noted, the facts described in this Order were developed in the course of that independent investigation.

Brasher, is a son of Ronald and Patricia Brasher. Carolyn Lutz and Norma Sumpter are Patricia Brasher's sisters. Norma Sumpter is also Jim Sumpter's wife; they, in turn, are the parents of Melissa Sumpter and Jennifer Hill. O.C. Brasher, deceased, was Ronald Brasher's father. Other family members involved in this matter are Ruth Bearden, the deceased mother of Ronald Brasher, and Diane Brasher, the wife of David Brasher, and the corporate Secretary and a Director of DLB.

4. In July 1996, Ronald Brasher, on behalf of DLB, submitted applications to PCIA in the name of, and appearing to bear the signatures of, O.C. Brasher, Ruth Bearden, Norma Sumpter, Jim Sumpter, Melissa Sumpter and Jennifer Hill. PCIA, in turn, submitted these applications to the Commission and Commission staff subsequently granted each of the applications.[2] The filing fees for all of these applications were paid with checks inscribed with the "Brasher" name and business address and purportedly signed by Patricia Brasher.

5. Initially, Ronald Brasher claimed, with respect to the stations licensed to entities or persons other than himself, Metroplex and DLB, that he acted as manager pursuant to oral agreements, now memorialized in writing, with the named licensees, and that he was subject to their supervision and control. However, O.C. Brasher had died in 1995 and Ruth Bearden had died in 1991, prior to the submission of the applications in July 1996. When specifically questioned regarding the submission of applications in the name of his deceased parents, Ronald Brasher asserted that he submitted the application of O.C. Brasher to the frequency coordinator prior to the death of O.C. Brasher on August 17, 1995 and that, as Executor of O.C. Brasher's estate, he submitted an assignment application in the name of O.C. Brasher in order to preserve an asset of that estate.[3] Ronald Brasher further stated that the company he hired to prepare various applications mistakenly filed Ruth Bearden's application in her name.[4] With respect to the licenses issued to the Sumpters and Ms. Hill, while they state that they were approached by Ronald Brasher about applying for FCC licenses, they deny ever knowing that they had stations licensed in their name until after Net Wave filed its petition. The Sumpters and Ms. Hill also state that the signatures on the applications filed in their names are not theirs. They also deny having any involvement in the construction or operation of their respective stations. They claim that they have not received any revenue or paid any expenses relating to those stations.

6. In response to a Commission inquiry letter to DLB, Ronald Brasher reported that "DLB is a family-owned business . . . without a rigid hierarchy of authority and responsibility."[5] Thus, it appears that other members of the Brasher group participated in, knew of, or had reason to know of possible misconduct. David Brasher is a Vice-President of DLB and Carolyn Lutz is DLB's Office Manager. In that capacity, each was involved in the operation of these stations on a daily basis. Each of the Brashers was also aware of the death of Ruth Bearden in 1991 and of O.C. Brasher in 1995. Nevertheless, in 1999 David Brasher executed a management agreement

[2] The license issued to Ruth Bearden for Station WPJR762 was cancelled in 1999 for failure to respond to a Commission staff inquiry regarding station construction and operation.

[3] O.C. Brasher died on August 17, 1995. However, the application filed in his name, and purporting to bear his signature, was dated June 17, 1996, was accompanied by a check, purportedly signed by Patricia Brasher, that was dated June 18, 1996 and was filed with the Commission on July 16, 1996.

[4] Ruth Bearden died on April 22, 1991. However, the application filed in her name, and purporting to bear her signature, was dated June 18, 1996, was accompanied by a check, purportedly signed by Patricia Brasher, that was dated June 18, 1996 and was filed with the Commission on July 17, 1996.

[5] Letter from Ronald D. Brasher to Thomas D. Fitz-Gibbon, Esq., Compliance and Litigation Branch, Enforcement and Consumer Information Division, Wireless Telecommunications Bureau, submitted to the Commission by Dennis C. Brown, Esq. with transmittal letter dated December 7, 1998 (¶2 of Answer 1).

purportedly on behalf of O.C. Brasher.[6] In sum, each of the Brashers engaged in activities that collectively raise questions about the nature and extent of their involvement in the apparent violations.

III. DISCUSSION

7. The circumstances described above raise substantial and material questions as to whether the above-captioned licensees and applicants are qualified to remain or to become Commission licensees.[7] It appears that the Brashers have caused the filing of applications in the names of dead people and in the names of persons who did not ever know of the applications' existence. Furthermore, it appears that the motive for this course of conduct was to avoid the strictures of PCIA and/or Section 90.313(c) of the Commission's rules,[8] and that Ronald Brasher, on behalf of DLB, obtained control of more channels than the number to which they were, or he thought they were, entitled. Finally, there are serious questions as to whether the Brashers misrepresented facts to or lacked candor with the Commission. If proven at hearing, this sort of intentional and fraudulent conduct could compel the conclusion that the perpetrators are not qualified to be Commission licensees.

8. Real Party-In-Interest/Control: In *Trustees for the University of Pennsylvania*, 69 FCC 2d 1394, 1396 (1978), the Commission noted:

> The Congress demonstrated its special concern that ultimate responsibility for a station's operation rests with the party licensed by this Commission by imposing requirements that licensees notify the Commission when a 'transfer of control' over a station was proposed and by further requiring a Commission finding that such a transfer will be in the public interest, convenience, and necessity before it can be consummated.

That sentence refers to Section 310(d) of the Communications Act, 47 U.S.C. § 310(d). Section 310(d) prohibits *de facto*, as well as *de jure*, transfers of control without Commission approval. *See Lorain Journal Co. v. FCC*, 351 F.2d 824, 828 (D.C. Cir. 1965), *cert. denied*, 383 U.S. 967 (1966). The phrase "real party-in-interest" is used in connection with pending applications, while "*de facto* control" is used in connection with a licensed station. In either case, the pertinent concern is whether someone other than the named applicant or licensee is in control. *See Arnold L. Chase*, 5 FCC Rcd 1642, 1648 n.5 (1990). The test for determining whether an individual is a real-party-in-interest in an application is whether that individual "has an ownership interest or is or will be in a position to actually or potentially control the operation of the station." *High Sierra*

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[6] See DLB's 308(b) Response letter from Michael L. Higgs, Esq., Schwaninger & Associates, Attorneys at Law, to Richard J. Arsenault, Esq., Compliance and Litigation Branch, Enforcement and Consumer Information Division, Wireless Telecommunications Bureau, dated April 5, 1999 (Bates page nos. 0500-0510, Radio System Management and Marketing Agreement made on March 29, 1999 between O.C. Brasher (Licensee) and DLB Enterprises, Inc. (Agent) and executed by David L. Brasher for Licensee and Patricia A. Brasher for DLB.

[7] The substantial-and-material-questions-of-fact standard of Section 309(d) and (e) of the Communications Act of 1934, as amended, 47 U.S.C. §309(d) and (e), applies to applications and not revocation. *See MCI Telecommunications Corporation*, 3 FCC Rcd 509, n.17 (1988). We, nevertheless, use it for convenience here in the revocation context as well.

[8] 47 C.F.R. § 90.313(c). That rule limits the eligibility of any particular licensee to one channel until it demonstrates that the channel assigned is fully loaded. In this service, a channel is fully loaded when 90 mobiles are operating on the channel.

Broadcasting, Inc., 96 FCC 2d 423, 427 (Rev. Bd. 1983). In determining whether *de facto* control of a non-broadcast license or facility has been transferred in violation of § 310(d), the Commission and the courts have traditionally relied upon a six-part test announced in *Intermountain Microwave*, 24 RR 983 (1963).[9] The six indicia of *de facto* control are:

(a) Does the licensee have unfettered use of all facilities and equipment?
(b) Who controls daily operations?
(c) Who determines and carries out the policy decisions, including preparing and filing applications with the Commission?
(d) Who is in charge of employment, supervision, and dismissal of personnel?
(e) Who is in charge of the payment of financing obligations, including expenses arising out of operating?
(f) Who receives monies and profits from the operation of the facilities?

While Ronald Brasher claims that he was simply managing the stations, subject to the control of others, it appears that several of the named licensees were either dead or unaware that they had licenses. Moreover, the Sumpters and Jennifer Hill state that they neither received any monies from station operations, nor paid any station expenses. Under those circumstances, substantial and material questions of fact exist concerning control of the stations. We will therefore specify real-party-in-interest and *de facto* control issues.

9. Abuse of Process: We will also specify an abuse of process issue. Abuse of process is a broad concept that includes use of a Commission process to achieve a result that the process was not intended to achieve, or use of that process to subvert the purpose the process was intended to achieve. *Broadcast Renewal Applicants*, 3 FCC Rcd 5179, 5199 n. 2 (1988). "It is an abuse of process to specify a surrogate to apply for a station so as to deny the Commission and the public the opportunity to review and pass on the qualifications of that party." *See Arnold L. Chase*, 5 FCC Rcd at 1643. The information before us suggests that the principals of DLB abused the Commission's processes by filing applications under the names of others to acquire licenses and stations that they may not have been able to acquire, and did not think that they were able to acquire, under their own names. The motive for doing so appears to be to avoid PCIA's policy that it would coordinate only a certain number of applications in an area at any given time for any entity. Another possible motivation would have been to avoid the limitations of Section 90.313(c) of the Commission's rules, which states, "A licensee will be required to show that an assigned frequency pair is at full capacity before it may be assigned a second or additional frequency pair." Another possible abuse of process is the alleged forgery of the signatures of the Sumpters and Jennifer Hill to their applications. The Sumpters and Jennifer Hill deny that they signed the applications filed in their names. If one or more of the parties forged signatures on an application or knowingly filed an application with a forged signature, such conduct would be an abuse of process because such conduct "threatens the integrity of the Commission's licensing processes." *Policy Statement on Character Qualifications in Broadcast Licensing*, 102 FCC 2d 1179, 1211 (1986).

10. Misrepresentation/Candor: Finally, we will specify a misrepresentation/lack of candor issue. Misrepresentation is a false statement made with intent to deceive, while lack of candor is a concealment, evasion, or other failure to be fully informative, accompanied by intent to deceive. *Fox River Broadcasting, Inc.*, 93 FCC 2d 127, 129 (1983). In *Contemporary Media, Inc., et al. v. FCC*,

[9] *See also Telephone and Data Systems, Inc. v. FCC*, 19 F.3d 42 (1994), which arose from an appeal of the Commission's decision in *Ellis Thompson Corp.*, 7 FCC Rcd 3932 (1992); *LaStar Cellular Telephone Co.*, 5 FCC Rcd 3286 (1990); *Norcom Communications Corporation*, 13 RCC Rcd 21483 (1998).

214 F.3d 187, 193 (D.C. Cir. June 16, 2000), the court recognized, "The FCC relies heavily on the honesty and probity of its licensees in a regulatory system that is largely self-policing." The Court also stated, "[I]t is well recognized that the Commission may disqualify an applicant who deliberately makes misrepresentations or lacks candor in dealing with the agency."[10] The information before us raises several substantial questions about the honesty of the above-captioned licensees. First, the Brashers' representations that the Sumpters and Ms. Hill were actively involved in applying for their licenses and in supervising the construction and operation of the stations in their names is inconsistent with the Sumpters' denial that they had any such involvement. Second, the Brashers submitted apparently inconsistent responses to the Commission regarding their involvement with the stations authorized to O.C. Brasher and to Ruth Bearden. Despite the fact that O.C. Brasher and Ruth I. Bearden were deceased prior to submission of any application in their names, Ronald Brasher claimed that he acted under their supervision when he obtained their licenses and/or constructed and managed their stations. He also stated that, as Executor of his father's estate, he signed O.C. Brasher's name to an assignment application, but the application did not reveal that O.C. Brasher was deceased. David Brasher executed a management agreement, purportedly on behalf of O.C. Brasher, on March 29, 1999, three and one-half years after the death of O.C. Brasher. DLB then submitted that agreement to the Commission. Third, Patricia Brasher denies providing any assistance or supervision regarding the preparation or filing of any applications in the names of O.C. Brasher or Ruth Bearden, yet checks bearing the name "Brasher" and purporting to bear Patricia Brasher's signature accompanied each application submitted to the Commission regarding these licensees. The inconsistencies between the available evidence and the licensees' statements require further exploration in a hearing. Accordingly, we will specify appropriate issues.

IV. ORDERING CLAUSES

11. Accordingly, IT IS ORDERED that, pursuant to Sections 309(e), 312(a)(2), 312(a)(4), 312(c) and 503 of the Act, 47 U.S.C. §§ 309(e), 312(a)(2), 312(a)(4), 312(c) and 503, the above-captioned licenses and applications are designated for hearing in a consolidated proceeding before an FCC Administrative Law Judge, at a time and place to be specified in a subsequent Order, upon the following issues:

(a) To determine whether any of the above-captioned licensees made misrepresentations to, and/or lacked candor before, the Commission in applications and/or responses to Commission inquiries;

(b) To determine whether any of the above-captioned licensees were undisclosed real-parties-in-interest or willfully and/or repeatedly violated § 310(d) of the Communications Act of 1934, as amended, by engaging in unauthorized transfers of control involving their respective stations;

(c) To determine whether any of the captioned parties abused the Commission's processes in connection with the filing of applications on behalf of O.C. Brasher, Ruth I. Bearden, Jim Sumpter, Norma Sumpter, Melissa Sumpter or Jennifer Hill;

[10] *Id.* at 196 (D.C. Cir. June 16, 2000), citing *Schoenbohm v. FCC*, 204 F.3d 243, 247 (D.C. Cir. 2000). *See also FCC v. WOKO, Inc.* 329 U.S. 223, 225-27 (1946); *Swan Creek Communications, Inc. v. FCC*, 39 F.3d 1217, 1221-24 (D.C. Cir. 1994); *Garden State Broad. Ltd. v. FCC*, 996 F.2d 386, 393-94 (D.C. Cir. 1993).

(d) To determine, in light of the evidence adduced pursuant to the foregoing issues, whether the above-captioned licensees are basically qualified to be and/or remain Commission licensees;

(e) To determine, in light of the evidence adduced pursuant to the foregoing issues, whether any or all of the above-captioned licenses should be revoked;

(f) To determine, in light of the evidence adduced pursuant to the foregoing issues, whether any or all of the above-captioned applications should be granted.

12. IT IS FURTHER ORDERED that, irrespective of the resolution of the foregoing issues, it shall be determined, pursuant to Section 503(b)(3)(A) of the Act, 47 U.S.C. § 503(b)(3)(A), whether an Order of Forfeiture shall be issued against any or each of the parties for having willfully and/or repeatedly violated Section 310(d) of the Act. For the violation of Section 310(d) of the Act, the maximum potential forfeiture liability for each of the parties shall be $82,500.00.[11] This figure is set based upon the seriousness of the alleged violations, the continuing nature of the alleged violations, the apparent culpability of each party, the information available to us concerning the financial condition of each party, the ability of each party to profit from the alleged rule violations, and the nature of the stations in question.

13. IT IS FURTHER ORDERED that, in connection with the potential forfeiture liability noted above, this document constitutes notice, pursuant to Section 503(b)(3)(A) of the Act.

14. IT IS FURTHER ORDERED that, to avail themselves of the opportunity to be heard and to avail themselves of the right to present evidence at a hearing in these proceedings, pursuant to §§ 1.91(c) and 1.221(c) of the Commission's Rules, 47 C.F.R. §§1.91(c) and 1.221(c), licensees Ronald Brasher, Patricia Brasher, David Brasher, D.L. Brasher, Carolyn S. Lutz, Jim Sumpter, Norma Sumpter, Melissa Sumpter, Jennifer Hill, DLB Enterprises, Inc. and Metroplex Two-Way Radio Service, in person or by their attorneys, shall each file, within 30 days after receipt of this Order, a written appearance stating that it will appear at the hearing and present evidence on matters specified in that Order. If any of the licensees fail to file a timely written notice of appearance, the right to a hearing shall be deemed to be waived. *See* Section 1.92(a) of the Commission's rules. Where a hearing is waived the licensee may submit a written, signed statement of mitigation or justification within 30 days of receipt of the Order to Show Cause. *See* Section 1.92(b) of the Commission's rules. In the event the right to a hearing is waived, the Chief Administrative Law Judge (or presiding officer if one has been designated) shall, at the earliest practicable date, terminate the hearing proceeding with respect to that particular licensee and certify the case to the Commission, and in the regular course of business, an order will be entered. *See* Section 1.92(c) of the Commission's rules. If a written notice of appearance is not timely filed on behalf of DLB Enterprises within 20 days of the mailing of this Hearing Designation Order, or it has not filed prior to the expiration of the specified time a petition to dismiss without prejudice or a petition to accept for good cause its written appearance beyond the specified time, its applications will be dismissed with prejudice. *See* Section 1.221 of the Commission's rules.

[11] The figure contained in Section 503(b)(2)(c) of the Act, 47 U.S.C. § 503(b)(2)(c), is $75,000. Pursuant to the Debt Collection Improvement Act of 1996, Public Law 104-134 (110 Stat. 1321-358), the maximum has been adjusted for inflation up to $82,500. See Section 1.80(b)(5)(iii) of the Commission's rules, 47 C.F.R. § 1.80(b)(5)(iii).

15. IT IS FURTHER ORDERED that pursuant to § 312(d) of the Communications Act of 1934, as amended, 47 U.S.C. §312(d) and § 1.91(d) of the Commission's Rules, 47 C.F.R. § 1.91(d), the burden of proceeding with the introduction of evidence and the burden of proof shall be upon the Enforcement Bureau as to the issues at ¶ 11 (a)-(e) and ¶ 12, above, and that, pursuant to 47 U.S.C. Section 309(e) and Section 1.254 of the Commission's rules, the burden of proceeding with the introduction of evidence and the burden of proof shall be upon the applicants as to the issues at ¶ 11(f).

16. IT IS FURTHER ORDERED that the Commission's Reference Information Center shall send a copy of this Order via Certified Mail - Return Receipt Requested to the captioned licensees and their counsel as follows:

Robert Schwaninger, Esq.
1835 K Street, N.W., Suite 650
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222 Molina Drive
Sunnyvale, TX 75182

Estate of O.C. Brasher
224 Molina Drive
Sunnyvale, TX 75182

17. IT IS FURTHER ORDERED that the Secretary of the Commission shall cause to have this Order or a summary thereof published in the Federal Register.

FEDERAL COMMUNICATIONS COMMISSION

Magalie Roman Salas

Magalie Roman Salas
Secretary