

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

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| In the Matter of |) | |
| |) | |
| Petition for Declaratory Ruling that |) | WT Docket No. 00-239 |
| Western Wireless' Basic Universal Service in |) | |
| Kansas is Subject to Regulation as |) | |
| Local Exchange Service |) | |

REPLY COMMENTS OF AT&T WIRELESS SERVICES, INC.

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To: Wireless Telecommunications Bureau, Commercial Wireless Division,
Policy and Rules Branch

REPLY COMMENTS OF AT&T WIRELESS SERVICES, INC.

Pursuant to the Public Notice in the above-captioned proceeding,^{1/} AT&T Wireless Services, Inc. ("AT&T") hereby submits its reply comments in opposition to the Petition for Declaratory Ruling filed by the State Independent Alliance and the Independent Telecommunications Group (collectively the "Independents").^{2/} The Independents argue that Western Wireless' ("Western's") Basic Universal Service ("BUS") offering in Kansas should not be regulated as commercial mobile radio service ("CMRS"), and that Western should be subject to all the regulations and Universal Service Fund ("USF") requirements applicable to local exchange carriers ("LECs") and Eligible Telecommunications Carriers ("ETCs") in Kansas.

^{1/} Public Notice, Wireless Telecommunications Bureau Seeks Comment on Petition for Declaratory Ruling that Western Wireless's Basic Universal Service in Kansas is Subject to Regulation as Local Exchange Service, WT Docket No. 00-239, DA 00-2622 (rel. November 21, 2000).

^{2/} Petition for Declaratory Ruling of the State Independent Alliance and the Independent Telecommunications Group, WT Docket No. 00-239 (filed November 3, 2000) ("Petition").

INTRODUCTION AND SUMMARY

The Independents' Petition should be denied. As several commenters point out, BUS is clearly a commercial mobile radio service because it is offered on an incidental or ancillary basis over a cellular network. Under the guise of "leveling the playing field," the Independents and their supporters would deprive rural customers of a competitive alternative for local telephone service by imposing unnecessary and unlawful regulation on BUS. Encouraged by the Commission, CMRS providers are developing a range of innovative fixed and hybrid offerings. Grant of the Petition would deter these innovations. At a minimum, the Commission should adhere to its stated policy of addressing questions about the regulatory status of fixed offerings on a case-by-case basis. As the Commission has acknowledged, broad pronouncements disconnected from specific facts could impede carriers from anticipating what services customers most need. Such blanket pronouncements would also soon be made obsolete by developments in technology and the marketplace.

Grant of the Petition is not necessary to preserve universal service in rural areas. CMRS providers pay into the USF and they must satisfy the same statutory requirements as LECs to be deemed ETCs, notwithstanding the statutory preemption of state rate and entry regulation of CMRS. Indeed, the goals of universal service are promoted by a regulatory environment that encourages new entrants to provide service in unserved or underserved areas. Congress and the Commission have consistently recognized the public interest benefits of promoting competition in the provision of universal service. The Commission should ensure that companies like Western continue to have the ability to fulfill this goal.

I. THE INDEPENDENTS FAIL TO DEMONSTRATE THAT WESTERN'S BUS SHOULD BE DENIED CMRS TREATMENT

A. Western's Fixed Service is Ancillary to its Mobile Service

Prior to August 1996, CMRS providers were permitted to offer fixed services over their wireless spectrum only on an “ancillary,” “auxiliary” or “incidental” basis. The Commission explicitly determined that these incidental services should be treated as CMRS.^{3/} While in the First Regulatory Flexibility Order, the Commission broadened the scope of permissible services permitted over CMRS spectrum to include fixed services provided on a “co-primary” basis (and left for further determination the regulatory status of such co-primary services),^{4/} it “did not alter in any way [its] regulatory treatment of ancillary, auxiliary, or incidental fixed services that had been provided by CMRS providers under [its] rules.”^{5/} Thus, whether fixed or mobile, ancillary services are appropriately classified as CMRS.

Western and other commenters have offered a number of compelling reasons why BUS, even as a co-primary offering, should be regulated as CMRS.^{6/} The Commission need not even reach this issue, however, because BUS is an “ancillary” wireless service. Indeed, prior to authorizing co-primary provision of fixed services, the Commission specifically held that one of

^{3/} Implementation of Section 3(n) and 332 of the Communications Act, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1424 ¶ 36 (1994) (agreeing that “all auxiliary services provided by mobile services licensees should be included within the definition of mobile services”).

^{4/} Amendment of the Commission's Rules to Permit Flexible Service Offerings in the Commercial Mobile Radio Services, WT Docket No. 96-6, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8965 (1996) (“First Regulatory Flexibility Order”).

^{5/} Amendment of the Commission's Rules to Permit Flexible Service Offerings in the Commercial Mobile Radio Services, WT Docket No. 96-6, Second Report and Order, 15 FCC Rcd 14680, 14683 ¶ 7 (2000) (“Second Regulatory Flexibility Order”).

^{6/} See Western Comments at 15-16; Dobson Cellular Systems (“Dobson”) Comments at 4-7; Rural Telecommunications Group Comments at 4-5; Sprint Comments at 9-11.

the types of services that PCS providers could offer on an auxiliary basis was “wireless local loop.”^{7/}

Although terms such as “ancillary,” “auxiliary,” and “incidental” are not defined in the rules and have been subject to different interpretations,^{8/} Sprint correctly points out that the Commission has used ancillary to mean “supplemental” or “occasional and ancillary to the primary business of [the] organization.”^{9/} BUS clearly fits this description. It makes up less than one percent of Western’s wireless traffic in Kansas and is only one of the many services Western offers consumers there. The Independents have not and could not demonstrate that BUS is anything other than ancillary.^{10/} As an ancillary service, BUS is CMRS and no further analysis is required.

B. Section 332 Precludes Regulating CMRS Carriers as Traditional LECs Until They Offer a Substitute for Landline Services in a Substantial Part of the State

The Independents and their proponents contend that Western’s BUS is a substitute for local exchange service and assert that it therefore must be subject to full LEC regulation on the state and federal level. The United States Telecom Association (“USTA”), for example, argues that two provisions of Section 332(c) permit states to regulate services provided by mobile technology when such services are a “substitute” or “replacement” for landline telephone

^{7/} See Amendment of the Commission's Rules To Permit Flexible Service Offerings in the Commercial Mobile Radio Services, WT Docket No. 96-6, Notice of Proposed Rulemaking, 11 FCC Rcd 2445, 2448 ¶ 13 (1996) (“As indicated in the earlier PCS proceedings, we always have intended wireless local loop to be a part of the family of services that meet our definition of PCS, whether implemented as a mobile or fixed service.); see also Amendment of the Commission's Rules to Establish New Personal Communications Services, Notice of Proposed Rulemaking, 7 FCC Rcd 5676, 5681 ¶ 10 (1992) (“We would classify wireless local loop service as a type of PCS. . .”).

^{8/} First Regulatory Flexibility Order, 11 FCC Rcd at 8970 ¶ 8.

^{9/} Sprint Comments at n.16.

^{10/} See Sprint Comments at 7; RTG Comments at 4.

exchange service.^{11/} Remarkably, USTA omits the crucial phrase in each of those provisions that requires a demonstration that the relevant service must be a substitute “for a substantial portion of the communications within such State” (Section 332(c)(3)(A)) or “for a substantial portion of the telephone land line exchange service within such State.” (Section 332(c)(3)(A)(ii)).^{12/} Neither the Independents nor those parties filing in support of the Petition have attempted to demonstrate that Western’s BUS offering comes close to meeting the “substantial substitute” test as it is set forth in the statute, and any such attempt would fail.^{13/}

Congress provided a limited exception to the preemption of state rate regulation of CMRS in cases in which a CMRS provider had become the primary provider of basic telephone service for a substantial portion of a state. The reasoning was straightforward: Congress believed that a state should have the opportunity to seek rate regulation authority over a carrier upon which a substantial number of subscribers depended for basic service to ensure that those subscribers received just and reasonable rates.^{14/} It is not enough that a CMRS provider merely offer a replacement service in a state or even actually provide such service in a limited geographical area. The threshold for permitting a state commission to seek rate regulatory authority is a showing that the CMRS provider “is a replacement . . . for a substantial portion of

^{11/} USTA Comments at 4.

^{12/} 47 U.S.C. § 332(c)(3)(A).

^{13/} The Kansas Corporation Commission (“KCC”) asks the Commission to address the meaning of “a substantial portion of the communications within such state” under Section 332(c)(3). KCC Comments at 3-4. As noted above, BUS customers constitute less than one percent of Western’s subscriber base in Kansas, which means that BUS does not even register when compared to the total communications services offered in Kansas. Such a limited offering can in no way be considered “substantial.” Consistent with the Commission’s policy of addressing such matters on a case-by-case basis, that is all it needs to decide in this proceeding.

^{14/} H.R. CONF. REP. NO. 103-213, at 493 (1993), reprinted in 1993 U.S.C.C.A.N. 1088, 1182 (“Conference Report”).

the telephone land line service,”^{15/} i.e., that it is actually providing service that substitutes for basic telephone service for a substantial number of subscribers in a state.^{16/}

As CTIA notes, the Independents’ insistence that BUS is a substitute for local service and therefore must be subject to exactly the same regulatory regime as that imposed on incumbent LECs is incorrect as a matter of law. Both Congress and the Commission understood that CMRS providers would likely offer services in competition with LECs, and they were encouraged to do so.^{17/} To further the goal of promoting local competition, Congress specifically preempted state rate and entry regulation of CMRS except under certain conditions, which, as noted above, are not met here.

II. REGULATING WESTERN’S BUS AS CMRS SERVES THE PUBLIC INTEREST

A. The Independents Seek To Impose Regulation Designed for Incumbents on New Entrants

All of the comments in support of the Petition were submitted by incumbent LECs (primarily rural) and their trade associations and consultants, and all of them seek to impose upon Western a set of regulations designed for wireline carriers with market power. Burdening new entrants like Western with governmental requirements aimed at incumbent carriers would disserve the public interest by deterring CMRS providers from offering competitive alternatives

^{15/} 47 U.S.C. § 332(c)(3)(A)(ii) (emphasis added). Notably, even if a CMRS provider’s service becomes a “substantial substitute” for landline service under Section 332(c)(3)(A), only a state, not competing carriers, may petition the Commission for rate regulation authority. Id. The KCC has not sought such jurisdiction over wireless providers and has not indicated that it intends to do so.

^{16/} As USTA recognizes, Congress did not authorize states to reclaim the authority to impose entry regulation on a CMRS provider. USTA Comments at 4. Section 332(c)(3)(A) only permits states to reclaim authority to regulate CMRS rates.

^{17/} See Conference Report at 493, reprinted in 1993 U.S.C.C.A.N. at 1182; First Regulatory Flexibility Order, 11 FCC Rcd at 8967 ¶ 3; Second Regulatory Flexibility Order, 15 FCC Rcd 14681 ¶ 3.

to the incumbents. In establishing regulatory frameworks, Congress and the Commission routinely distinguish among carriers on the basis of their market power.^{18/} Calls for “regulatory parity” between incumbents and competitors are fundamentally at odds with this basic principle, and may be dismissed as empty rhetoric. As RTG -- each of whose members are affiliated with rural incumbent LECs -- points out, the Commission’s objective in giving CMRS carriers the flexibility to provide a broad array of services was to stimulate wireless competition in the local exchange market.^{19/} Western is in the beginning stages of accomplishing this goal and should not be hamstrung now by additional layers of regulation.

Rather than mechanically imposing LEC regulation on fixed wireless offerings, the Commission has correctly decided to make determinations about the regulatory status of co-primary fixed services on a case-by-case basis. The Commission has recognized that the deployment of fixed and hybrid services on CMRS spectrum is evolving, and that it is far too early to predict how such services will develop, how they will be integrated, or the variety of services that will be offered. Western and several other CMRS providers are just beginning to test market their fixed and hybrid offerings, and it is likely that additional carriers will establish their own particular service packages in the future. To make broad pronouncements, such as those proffered by the Independents, at this early stage in the development process “could impede carriers from anticipating what services customers most need, and could result in inefficient spectrum use and reduced technological innovation.”^{20/} Other than their fear of competition, the Independents provide no reason to impose a regulatory straitjacket on CMRS

^{18/} See CTIA Comments at 2; Dobson Cellular Comments at 10-11; RTG Comments at 7-8; Sprint Comments at 11; Western Opposition at 25-26.

^{19/} RTG Comments at 6.

^{20/} First Regulatory Flexibility Order, 11 FCC Rcd at 8976 ¶ 22.

providers that “would be based on assumptions and criteria that could soon be made obsolete by developments in technology and the marketplace.”^{21/} Now, more than ever, the Commission must allow CMRS providers the flexibility to meet consumer demand.

B. The Classification of Fixed or Hybrid Wireless Services as CMRS Will Promote Universal Service

The Independents and their supporters suggest that the failure to impose identical regulations on all recipients of universal service funds will have grave consequences for consumers.^{22/} This assertion is utterly groundless, and ignores Congress’s explicit decision to exempt CMRS providers from state rate and entry regulation while permitting them to seek ETC status. Contrary to the Independents’ assertions, regulation of BUS and other fixed and hybrid wireless services as CMRS will further the Commission’s USF goals.

As a threshold matter, CMRS carriers contribute to the USF fund --in amounts far greater than they take out-- and they are entitled to take out of the fund when they provide supported services. The Commission has specifically determined that the universal service fund should be administered on a technology-neutral basis and that all types of carriers offering all types of services (including pure mobility providers) can become eligible telecommunications carriers (“ETCs”) so long as they meet certain basic requirements.^{23/} While all ETCs must satisfy the same federal criteria, the Commission has crafted its rules broadly enough to encompass

^{21/} Second Regulatory Flexibility Order, 15 FCC Rcd at 14683 ¶ 7.

^{22/} See, e.g., Petition at 15; Rural Utilities Service Comments at 3 (failure to impose the same obligations on CMRS providers as those imposed on LECs “will devolve service, not evolve it”); Nebraska Rural Independent Companies Comments at 2; National Telephone Cooperative Association Comments at 2-4.

^{23/} Federal-State Joint Board on Universal Service, Report and Order, 12 FCC Rcd 8776, 8858 ¶ 145 (1997) (“[A]ny telecommunications carrier using any technology, including a wireless technology, is eligible to receive universal service support if it meets the criteria under section 214(e)(1).”) (“Universal Service Order”).

different types of technologies.^{24/} For example, as Dobson notes, the Commission expressly found that CMRS providers' inability to provide the same level of enhanced 911 services as their wireline counterparts and their exemption of equal access requirements would not render them ineligible for federal USF support.^{25/}

Although the Independents make much of the fact that wireless carriers are not subject to each and every state regulation imposed on incumbent LECs, they can point to no such federal requirement because none exists. To the contrary, the Commission has emphasized that “[t]he treatment granted to certain wireless carriers under section 332(c)(3)(A) does not allow states to deny wireless carriers eligible status.”^{26/} According to the Commission, any wholesale exclusion of a class of carriers due to technological differences “would be inconsistent with the language of the statute and the pro-competitive goals of the 1996 Act.”^{27/}

In any event, the Independents' demand for “regulatory parity” and “technology-neutral regulation” ignore the substantial range of regulations to which CMRS providers are subject. Wireless carriers must comply with federal licensing and technical rules (which, notably, are not imposed on LECs), and they are required to contribute to the universal service and other

^{24/} In recently granting Western ETC status in Wyoming, the Commission confirmed that wireless carriers have to satisfy the relevant criteria even if they are not subject to state jurisdiction. Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, CC Docket No. 96-45, Memorandum Opinion and Order, at ¶¶ 1, 8 (rel. December 26, 2000) (concluding that Western “has satisfied the statutory eligibility requirements of section 214(e)(1)” by demonstrating that it will “offer and advertise the services supported by the federal universal service support mechanism throughout the designated service areas”).

^{25/} Dobson Comments at 11 (citing Universal Service Order, 12 FCC Rcd at 8816 n.116, 8819-8820 ¶¶ 78-79).

^{26/} Universal Service Order, 12 FCC Rcd at 8858 ¶ 145; see also id. at 8851 ¶ 135 (“[S]ection 214(e)(2) does not permit the Commission or the states to adopt additional criteria for designation as an eligible telecommunications carrier.”).

^{27/} Id. at 8858 ¶ 145.

federally administered funds. The fact that wireless and landline carriers face different regulatory regimes is not a reason to subject the former to requirements intended for the latter, and there is no legal or policy basis for doing so.

Similarly, the Independents fail to demonstrate that the specific state regulations to which they seek to subject BUS would in any way further the public interest. As USTA acknowledges, the purpose of BUS is to offer basic service “in rural areas that lack wireline service”^{28/} If BUS had to meet all of the landline requirements the Independents describe, Western would likely discontinue the service to the detriment of subscribers in those areas. In most cases, moreover, the Petition raises issues that are easily resolved without imposing new and unwarranted rules on BUS. For instance, according to the KCC, the minimum data transmission speed requirement cited by the Petition is not applicable to any competitive carrier and thus Western would not be required to comply with it.^{29/} Similarly, the White Pages publication issue to which the Incumbents advert^{30/} is easily resolved through private negotiations.^{31/}

The alleged “problems” raised in the Petition and supporting comments with Western’s regulatory classification are nothing more than an attempt by incumbents to preclude competition to their monopoly services from CMRS providers. These parties’ true complaint is with the fact that the 1996 Act and the Commission’s implementing regulations establish a presumption in favor of competition in all parts of the country -- including rural areas -- by permitting USF funding to be obtained on a technology-neutral basis by all types of carriers that are subject to different levels of regulation. The time to request reconsideration of those decisions has long

^{28/} USTA Comments at 3.

^{29/} KCC Comments at 2-3.

^{30/} Petition at 15.

^{31/} KCC Comments at 3.

passed and, as the Commission recognizes, reconsideration of the sort urged by the Independents would slow the provision of universal service to the detriment of consumers.

CONCLUSION

For the foregoing reasons, the Commission should deny the Independents' Petition and rule that Western's BUS offering is CMRS. The Independents have failed to demonstrate that BUS is not ancillary to Western's primary mobile service or that Section 332(c) authorizes state regulation of the service. Moreover, the Independents ignore the public benefits of Western's service and propose regulations that would do nothing more than discourage competition.

Respectfully submitted,

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Dated: January 8, 2001

CERTIFICATE OF SERVICE

I, Angela Collins, hereby certify that on this 8th day of January 2001, copies of the foregoing Comments of AT&T Wireless Services, Inc. were sent by first class mail, postage prepaid, to the following:

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