

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

In the Matter of)
)
Schools and Libraries Universal Service) CC Docket No. 02-6
Support Mechanism)
)
)

**Kellogg & Sovereign Consulting, LLC
COMMENTS
FCC Second Further Notice of Proposed Rulemaking**

**Debi Sovereign and Jane Kellogg
902 Arlington Center, #136
Ada, Oklahoma 74820
580-332-1444**

March 9, 2004

I. INTRODUCTION

In response to the Commission's Second Further Notice of Proposed Rulemaking, Kellogg & Sovereign Consulting hereby respectfully submits our comments on the proposed changes and other aspects of the E-Rate program.

Kellogg & Sovereign Consulting, LLC ("K&S") has been directly involved in the E-Rate program since its inception in 1998. As a consulting firm, we assist schools and libraries in applying for universal service discounts as provided by the E-Rate program. For the 2004-05 program year, we worked with applicants to file over 300 applications which will ensure that 162 school districts and library systems comprising over 194,000 students will have access to affordable telecommunications and Internet Access. The schools and libraries we serve are located in Oklahoma, Colorado, Illinois, Connecticut, and New Jersey, with the majority located in Oklahoma. The largest school district is Hartford School System with 23,596 students and the smallest is Plainview located in the panhandle of Oklahoma with 18 students.

II. COMMENTS

A. DISCOUNT MATRIX

We agree that the discount matrix for Priority Two (Internal Connections) requests should be amended. By reducing the discount rate, applicants in the higher bands would be more accountable for their funding requests and would have a stronger incentive to control costs of internal connections. We believe the 70% discount that has been suggested where the applicant's share would be 30%, is too much of a reduction from the 90%. For the poorest communities, an 80% discount would be more reasonable and was the discount recommended by the Administrator's Waste, Fraud and Abuse

Task Force (See USAC-Schools & Libraries Support Mechanism Interim Response to the Recommendations of the Task Force on the Prevention of Waste, Fraud, and Abuse. November 26, 2003). The 80% discount will require the poorest schools to pay twice as much for their share of funded Priority Two services as they have in the prior years. We believe the change from 90 to 80% will be drastic enough to achieve the goal of providing applicants with additional incentive to control costs.

We did not see any recommendations to divide the upper bands. One of the issues in providing funding down to the 80% discount level where 50-74% of the students are eligible for the National School Lunch Program (NSLP) has been how to handle pro-ration of funds if there are insufficient monies to fund all requests in the band. If the upper two bands are divided into smaller sections, then this issue would be minimized. Example:

Priority Two Discount Matrix			
INCOME	Urban	Rural	Income% Increment
Less than 1%	20%	25%	
1% to 19%	40%	50%	18%
20% to 34%	50%	60%	14%
35% to 49%	60%	70%	14%
50% to 64%	70%	75%	14%
65% to 79%	80%	80%	14%
80 to 100%	85%	85%	20%

The discount matrix in the above example addresses the problem in the current discount matrix where there is a large number of applicants in the 80% discount band. In the current discount matrix, the bands cover an income % range of 14 to 19% until you get to the 50% income level (80% discount). The 80% discount band currently

covers the income range from 50 to 74 % for a range of 24%. If you were to divide this band like the lower bands currently are, then it would be easier to provide funding for internal connections in this income range without the need to pro-rate available funds. It will also more accurately reflect the ability of poorer districts to pay for their share. We see a dramatic difference in the economic status of schools whose low income % is 74% versus those whose low income percentage is in the 50% range. The 50-64% low income level communities would have a much greater ability to pay 30% applicant shares, whereas the 65-74% low income level communities would have a harder time coming up with their share if you were to require them to pay 30%. In our example we are also showing a top discount of 85% for the 80-100% income levels. Even though we work with a large number of low income, rural schools, there are very few schools who have low income levels above 79%. These poorest schools have become extremely dependent on E-Rate funding and the 15% applicant share would be much better than requiring them to pay 20% of their internal connections.

The transition to the new discount matrix will need to carefully consider the burden on applicants who are committed to multi-year contracts. Additionally, the revised discount matrix must be announced prior to the beginning of the E-Rate cycle (for example, change effective for FY 2005-06 would need to be posted in June, 2004) .

B. COMPETITIVE BIDDING PROCESS

The current FCC Form 470 process is adequate, but not perfect. Due to the wide range of state and local procurement laws, however, we do not recommend making significant changes to the current process. In our experience, the posting of the Form 470 itself is not sufficient to receive competitive bids. In order to receive multiple bids

we frequently have to call service providers directly and ask them to submit bids. Since many of our schools are located in remote areas the “pool” of qualified service providers may be very limited and in some instance there is indeed only one available provider for the requested service. We find that schools and libraries that are located in or near metropolitan areas typically receive more bids than those schools in rural areas. Additionally, schools who proactively seek bids by contacting service providers will receive more bids than others.

We do not recommend eliminating the Form 470 process for specific services as this would create another possible stumbling block for applicants. An example would be an applicant who applies for POTS and cell service as well as annual maintenance on their network. They could mistakenly think that they did not need to file the Form 470 since they only request POTS and cell service and forget that they needed to file the Form 470 for the one service: annual network maintenance. In our experience with schools who have a million other duties besides filing Erate applications, the less change the better and the less “exceptions to the rule” the better. If the school knows they always file the Form 470 each year, then they’ll remember to file. If they file the Form 470 one year, but not the other, then need to file it again the third year, the school may very well accidentally not file in the year the form is required.

We do recommend that the Form 470 allow for summary RFP information. Curently if the school has a separate RFP, they can only mark that they have an RFP and cannot provide any information on the Form 470 itself. It would be very helpful if you could mark that you have a detailed RFP, but could also provide summary RFP information on the Form 470 itself. For example, on the Form 470 you could say you were requesting a DHCP server for the ES. On the RFP itself, the school would then

provide specifications for the server such as type of processor, hard drives, rack mount, etc.

We also recommend that the Administrator should not allow any oral RFPs. RFPs should always be available in written form and should be available by request within a specified period of time (2-3 days).

We agree that the Commission should require that each service provider certify that the prices in its bid have been independently developed. Additionally, we agree that both recipients and service providers should be required to retain documentation for a period of five years. The certification that the Service provider will agree to participate in audits as described in Section G, Paragraph 89 of the Third Report and Order could be included with this one certification from the service provider.

C. DEFINITION OF RURAL AREA

It is recommended that the Commission adopt the new definition of rurality as adopted by the United State Department of Agriculture in 2003.-

<http://www.ers.usda.gov/Briefing/Rurality/>. See summary that follows:

"In June 2003, the OMB released the Census 2000 version of metropolitan (metro) and nonmetropolitan (nonmetro) areas, a classification system often used to define urban and rural America. In this most recent update, nonmetro America comprises 2,052 counties, contains 75 percent of the Nation's land, and is home to 17 percent (49 million) of the U.S. population. The new version classifies 298 formerly nonmetro counties (10.3 million residents) as metro; 45 metro counties (3 million people) were reclassified as nonmetro. Thus, the new set of nonmetro counties contains a net of 7.3 million fewer residents than the former (1993) set based on the 1990 census.

Comparison of 1993 and 2003 metro and nonmetro classifications				
	Former (1993) metro counties		Former (1993) nonmetro counties	
	Number of counties	Population 2000	Number of counties	Population 2000
Current (2003) metro counties	791	222,307,173	298	10,272,767
Current (2003) nonmetro counties	45	2,955,407	2,007	45,882,270

This latest reclassification reflects not only a decade of urban growth and restructuring, but also extensive modification of the rules governing metro and nonmetro status. OMB made far-reaching changes, simplifying criteria and adding a new [micropolitan area classification](#). The new category subdivides previously undifferentiated nonmetro territory into two distinct types of counties-- micropolitan and noncore, thus providing a window on the diversity found in nonmetro America."

If this definition of rurality were implemented several very small schools in Oklahoma would benefit greatly. These communities have no industrial base, have a low population density, and usually serve as bedroom communities for much larger metropolitan areas located 30-60 minutes away. Because the population historically has not had a high enrollment of low-income children they have struggled to install basic network and Internet access. They do not have sufficient servers, routers are undersized for their needs, and they have limited telephone systems and access.

Schools that would be directly impacted in a positive manner in Oklahoma include the following small schools with the problems detailed above:

<u>Garfield County:</u>	Student Enrollment	Actual F/R
Chisholm	889	27%
Covington-Douglas	289	58%
Drummond	258	34%
Garber	340	51%
Kremlin-Hillsdale	245	41%
Pioneer-Pleasant Vale	566	48%
Waukomis	363	43%

Pottawatomie County	Student Enrollment	Actual F/R
Asher	207	70%
Bethel	1233	59%
Dale	687	33%
Earlsboro	247	71%
Grove	387	52%
Macomb	369	72%
Maud	368	72%
McLoud	1700	47%
North Rock Creek	512	52%
Pleasant Grove	235	80%
South Rock Creek	341	28%

Pottawatomie County	Student Enrollment	Actual F/R
Tecumseh	2245	62%
Wanette	291	81%

We agree that the current rural designations should be grandfathered in if a new definition is adopted. Many of these communities have the same problems as the communities listed above. Proximity to an urban area does not necessarily mean that the school district has sufficient tax base to provide the necessary telecommunications resources to maintain equal status with urban schools.

These recommended new designations have already been adopted by many federal agencies.

D. DEFINITION OF INTERNET ACCESS

The Commission proposes to modify the rules governing the funding of Internet Access to include support for features that provide the capability to generate or alter the content of information.

Although we support expanding the definition of Internet Access to incorporate virtual private networks and the ability to change data over the Internet for purposes such as student information systems, we oppose expanding the definition of Internet Access to include commercially available intellectual content. In the education industry, intellectual content is expensive and incorporating access to content along with Internet access would result in large amounts of E-Rate funding being spent on purchasing intellectual content and not on products and services that meet the purposes of the program, i.e, bringing Internet Access to the classroom.

For purposes of the rural health care support mechanism, “eligible Internet access” is defined as “an information service that enables rural health care providers to

post their own data, interact with stored data, generate new data, or communicate over the World Wide Web.” (*Rural Health Care Order and Further Notice*, FCC 03-288, at para. 25.)

In order to avoid using the schools and libraries universal support mechanism (“E-Rate”) to pay for commercially available intellectual content, we propose the wording be changed to read: “an information service that enables schools and libraries to post their own data, interact with stored data, generate new data, or communicate over the World Wide Web. **Eligible Internet Access does not include access to commercially available intellectual content.**”

E. WIDE AREA NETWORKS

We agree the standard for determining whether expenditures that subsidize infrastructure investment, either on-premises or off-premises, should be refined. We agree that the FCC should adopt a rule that would limit recipients from receiving discounts for service provider upfront capital investments to the extent those capital investments exceed 25 percent of the funding request for the service in question.

We have encountered problems with the necessity to prorate non-recurring charges associated with capital investment made by a service provider over a term of at least three years. The uncertainty associated with whether a school district will receive funding or not has resulted in telecommunications companies requiring the district pay out the amount due regardless of whether the school district receives funding from E-Rate. In most states it is not legal for a school district to enter into multi-year agreements unless the contract states that the contract is annually renewable, and has a non-appropriation clause.

Even though there may be a non-appropriation clause in the contract, some telecommunications companies have added an exclusion as follows:

“Lessee understands and acknowledges that the inability to obtain a funding commitment from the Schools and Libraries program of the Federal Universal Service Fund or the discontinuance of such Schools and Libraries program shall not constitute a non-appropriation event under this Section.”

Based on our experience over the past seven years, even when applications have been appropriately filed a district may not receive funding for many reasons. One of these reasons may be because one service provider on the application is being investigated. During the entire investigation period, all applications and funding requests from that school are held at SLD and no portion of the application is funded.

Adding additional years to the time required to prorate the investment would increase the level of risk by both the telecommunications companies and the school district. Consequently, we do not agree it would be appropriate to spread out the investment over a period of 5 years unless some guarantee can be made that this specific service will continue to be funded irregardless of whether the other components of the application receive funding.

Dark Fiber

We do NOT agree with the new requirement for the school or library to convert their present lease of dark fiber to be a functioning service from either a telecommunications service provider or internet access provider, who in turn is responsible for providing both the fiber and the equipment to light the fiber.

Many districts have made a substantial investment over the previous several years in the equipment to light the dark fiber they are leasing. By requiring the districts to lease

both the unlit fiber and the equipment necessary to light the fiber their annual costs increase significantly thereby increasing the amount of funds required from the E-rate program.

Additionally, the same issues detailed above arise regarding unfunded applications. There are no guarantees that the district will receive funding each year. For example, a large district in Connecticut signed a multi-year lease of dark fiber several years ago. They purchased all the equipment necessary to light the fiber when the dark fiber lease began. In funding year 2003, they were not funded for any of their applications. Consequently, while the fiber lease is substantial, they already owned the equipment to light the fiber so did not incur any additional expense beyond the fiber lease.

F. RECOVERY OF FUNDS

We agree with the Commission that in most cases recovery should be sought from the service providers first. It has been our experience that the service providers who have committed statutory violations or fraud usually convinced the applicant that the service provider fully understood the E-Rate program and that the actions of the service provider were within the program guidelines. We have not seen any situations in which the applicant initiated the “questionable actions.” Additionally, the service providers were the ones that benefited the most. The applicant received over-priced items that were poorly installed, and the service provider received a nice check from the E-Rate program. Service Providers who try to “pull the wool over the eyes” of applicants will frequently prepare the Form 486 for the applicant and have them sign it without knowing exactly what the Form 486 is for. The service provider then will bill SLD for services that were never received by the school. This particular scenario is being

curtailed by the new “Service Certification” process done by the Administrator before approval of the service provider invoice. The Commission may want to consider codifying this administrative procedure and require service certification by the applicant on ALL invoices for internal connections over \$5,000.

We agree that the Commission rules should include *de minimis* guidelines for recovery. We recommend that the Commission research best practices of other audit agencies such as the Internal Revenue Service and other federal agencies to determine how these agencies handle recovery issues. The rules need to be written so that the recovery decisions can be made within set guidelines but with the ability to make decisions for recovery on a case by case basis. We also recommend a “statute of limitations” on recovery. We recommend three years from the end of the funding year for non-statutory violations and 5 years from the end of the funding year for statutory violations.

Regarding other measures to ensure service provider and applicant accountability, we agree that the Commission should implement procedures or adopt rules to defer action on any additional funding request involving a beneficiary for whom there is an outstanding commitment adjustment proceeding, but ONLY for those funding requests that are for the associated service provider. We do NOT believe it is fair to hold funding on the applicant’s other funding requests that are unrelated to the service provider in question. For example, if a school is requesting discounts on their telephone, long distance, and cell phone charges, these should continue through the normal funding process. The funding request(s) for internal connections associated with the same service provider involved in the outstanding commitment adjustment would be held until the outstanding commitment adjustment proceeding has been settled. If an

applicant has been subject to a commitment adjustment proceeding, they should be subjected to more rigorous scrutiny before receiving commitments in the future for only one funding cycle. We are currently working with a school district who changed from a service provider who had questionable practices in FY 2002. For FY 2002 the school cancelled all funding requests with this provider and only received E-Rate discounts on their Priority One (Telecommunications and Internet Access) funding requests. For FY 2003, the school went through an Item 25 Selective Review. They had been very careful for 2003-04 to follow all program rules. As of March, 2004 they still have not received any E-Rate funding for the current year. As a small, rural school district, they will be forced to disconnect their circuits for Internet Access soon as they cannot afford to pay 100% of the cost. They could not afford to be under an audit again for the 2004-05 program year, as they would not see any E-Rate discounts for a two year period. Certainly, if the school failed the Item 25 Selective review in the first year, they should be subject to scrutiny again in the next year. But we believe that if the school shows they are fully compliant, then they should be able to return to the normal funding cycle in the year after the audit.

G. OTHER ACTIONS TO REDUCE WASTE, FRAUD & ABUSE

Cost-Effective Funding Requests.

We believe it would be beneficial for the Commission's rules to establish a test for "cost effective" service. One means for accomplishing this would be to cap funding for an item that is priced above the manufacturer's suggested retail price (MSRP). Since the Administrator is requiring that the applicants provide the manufacturer and model number, the Program Integrity Assurance reviewer could compare the price on the

funding request to the MSRP. If the price on the funding request was higher than the MSRP, the reviewer would only allow funding up to the retail price.

For non-product specific items such as labor and network maintenance, there would need to be guidelines established for economically reasonable costs. Establishing “threshold reasonable costs” for these items will be more difficult since these prices range based on location, type of building, etc. We recommend that the Commission address network maintenance charges first as we believe this area has the greatest amount of waste. Based on recommendations of the Administrator after applying the new procedures for one year, the Commission could look into expanding the process to other non-product costs such as installation and travel. We recommend determining a maximum dollar amount per student for network maintenance based on average charges for school districts located in rural areas. In other words, set the bar high initially. If an applicant’s network maintenance cost was above this amount, then the burden would be placed on the applicant to prove that their charges were for basic network maintenance only. The assumption would be that the Program Integrity Assurance (PIA) reviewer would adjust the network maintenance cost down to the pre-determined reasonable cost, but if the applicant can prove the higher cost and produce documentation on competitive bids, then the reviewer could accept the higher amount requested. Once this program was in place for one year, the Administrator would be able to make recommendations on adjustments to the “threshold reasonable costs.”

Recordkeeping Requirements and Service Provider Audits

We agree that the Commission rules should require both the applicant and service provider to keep records for a period of five years from the end of the funding year. The Commission could codify the list of documents that are already listed on the

Administrator's "Audits of Beneficiaries Fact Sheet"

(<http://www.sl.universalservice.org/reference/AuditFactSheet.asp>)

We also agree that the Commission should require that service providers comply with random audits or reviews that the Commission or USAC may undertake periodically to assure program compliance, and beneficiaries should be required to authorize the release of such information.

Consultants and Outside Experts

We fully support the Commission's suggestion that applicants should be required to identify any consultants or other outside experts, whether paid or unpaid, that aid in the preparation of the applicant's technology plan or in the applicant's procurement process.

We also agree that consultants and other outside experts offering their services to applicants should be required to register with USAC and to disclose any potential conflicts of interests derived from relationships with service providers. The consultants/outside experts should also be required to disclose whether or not they have received commissions from service providers who are listed on the applicant's Form 471. If there are commissions received, the consultant/outside expert should be required to list the amount and nature of the commission received.

Service Provider - Prohibition on Technology Planning or Procurement Management Assistance.

We support adoption of a rule that would prohibit service provider involvement with preparation of the technology plan and the Form 470. The wording of the prohibition, however, must not prohibit a service provider from providing advice on what the applicant needs and what new technology is available. Our schools depend on

the advice of their service providers to determine where their technology is weak and what new products/solutions are available. The prohibition should be against the service providers from making the decisions of what to request, preparing the technology plan, and from actively participating in the procurement process; not on providing advice. In rural areas, we find that frequently there is not anyone who is willing to provide technical assistance and evaluations at no charge to the applicant if they are not able to be selected as a service provider in the future. Realistically, the rural schools simply don't have the funds to pay for someone to travel from a major city to provide this type of evaluation. The way the schools learn about technology is from attending annual meetings and from the service providers in their area who are in most cases providing services to the school.

We recommend the following: "an entity that seeks to become a service provider may not be directly involved in the preparation of the applicant's technology plan, the preparation of the Form 470, the preparation of the request for proposal, or any other procurement process. The entity may provide technical assistance, assistance in technical evaluations, or systems engineering services to a particular recipient as long as they have no involvement in the technology planning or procurement process."

Distribution of Support Payments & Invoice Extensions

We agree that the Commission should codify both the rules regarding the establishment of deadlines for service providers to file invoices with the Administrator and the current Administrator's rules for deadline extensions to file invoices under certain circumstances.

Technology Plans

We support the codification of USAC's current guidelines regarding technology plans.

We do NOT support requiring applicants to analyze the cost of leasing versus purchasing E-rate eligible products and services. Leasing options are not readily available to rural schools nor can they count on being funded each year of E-rate. Consequently, by purchasing the equipment, they know they will be able to use the equipment year after year. If they were to lease the equipment, they could not count on routers, servers, switches and other essential network equipment to be available every year. Additionally, the lease vs. purchase decision should be one that will be considered by the applicant in its normal course of business and is already addressed in local and state procurement guidelines. This requirement would place an undue burden on applicants, in many cases would be an exercise without benefit, would place another requirement on the applicant to prove the lease vs purchase analysis was done on every funding request, and could ultimately result in applicants "throwing their hands up" in frustration.

We do NOT support requiring applicants to consider the most cost-effective way to meet its educational objectives. This requirement would create an undue burden on applicants who would be required to prove cost effective selections twice: once during the technology planning process, and once during the application process. The applicants already participate in a competitive bidding process through the Form 470 and there is no reason to require them to go through the process twice. Additionally, applicants already must meet local and state procurement guidelines and must work within their local budgetary constraints.

We do support amending the Commission's technology planning requirements to be more consistent with the technology planning goals and requirements of the U.S. Department of Education and the U.S. Institute for Museum and Library Services.

We also believe that the Commission's technology planning requirements could be strengthened through changes in qualifications for entities, including states which approve technology plans. The technology plan approvers should be required to participate in training in an online format like the Webex service provider training. They should be required to take a short test and receive certification to be a technology plan approver. We also believe the technology plan approver should be required to send announcements via letter, fax or email to the schools/libraries under their jurisdiction and inform them of the Technology Plan deadlines. Since the states are not required to approve the technology plan until the start of service, we find that many applicants don't realize that the technology plan actually must be prepared prior to the submission of the Form 470. One major problem we have found on the technology plan approval process is there is no funding to cover the administrative costs incurred by the technology plan approval staff. States should receive some support for staff time required to review and approve technology plans.

Use of Surveys to Determine School Lunch Eligibility

We have several school districts who conduct a survey of income level in order to determine the level of poverty for purposes of the schools and libraries universal service discount mechanism.

The USAC procedures currently in place work extremely well and result in a representative sample of the income level of the student population. We believe that the 50% response rate is appropriate and we do NOT believe the Commission should

consider a lower rate. Setting the response rate below 50% may result in an invalid sample.

We do, however, recommend allowing the applicant to conduct a survey and use the entire population if they receive less than the 50% response rate. For example, School A conducts a survey. They have a total student population of 100. Only 20 students (20%) return surveys. Of the 20 surveys returned, 15 students qualify for the National School Lunch Program (NSLP). Even though the school only received 20 surveys, they should be able to count the 15 students as eligible, but they will have to use the total enrollment to determine the percentage: $15/100 = 15\%$.

Additional recommendations for reducing waste fraud and abuse.

We highly recommend to the Commission that the Administrators rules for making corrections to the Receipt Acknowledgement Letter within 3 weeks of receipt be changed to allow corrections that increase amounts requested or increase the discount percentage.

In any program, if the participants believe that the rules are fair, the participants will be willing to play by the rules. If they believe the rules to be unfair, then the participants will look for ways to circumvent the “unfair” rules. We believe that this is the case in the area of corrections. The current procedures for making a correction to a Form 471 application allow most corrections to keying errors EXCEPT those corrections that would increase the discount percentage or would increase the amount requested. There is no reason in our opinion that this should be the case. If a keying error is made, the applicant should be able to correct regardless of whether or not the change will increase the discount % or the amount. Since the applicant only has 3 weeks in which to

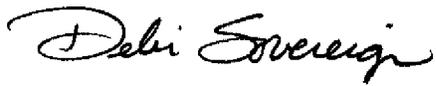
make the change, an increase in the demand estimate is not an issue. We can certainly understand that the Administrator is working as fast as possible to provide a demand estimate and any increases would be a problem once the demand estimate has been provided. However, as long as the applicants are limited to a three week period, there is no reason why the correction couldn't result in an increase as well as a decrease.

The applicant's correction will still go through program integrity assurance and must be documented. You simply can't make a correction to your discount percentage or to an amount requested without being able to document the corrected discount percentage or request.

H. MISCELLANEOUS

Priority for Applicants that have not Achieved Connectivity. We believe that the new changes in the Third Report and Order regarding Internal Connections 2 in 5 rule, the carry forward of unused funds, plus additional measures to reduce waste, fraud, and abuse in the program will provide needed funding for those applicants who have not yet achieved connectivity. We strongly oppose providing priority for internal connections to those applicants that have not yet achieved Internet connectivity in their classrooms or libraries. Such a proposal would penalize those schools who have worked hard to obtain funding from other sources to provide connectivity. The rules should be the same for everyone, and those schools or libraries who have not taken the additional steps necessary to provide connectivity for their classrooms and libraries should not have priority over schools and libraries in the same discount bands who have taken the initiative.

Respectfully Submitted,

A handwritten signature in black ink that reads "Debi Sovereign". The signature is written in a cursive, flowing style.

Debi Sovereign

Partner

Kellogg & Sovereign Consulting, LLC

902 Arlington Center, #136

Ada, OK 74820

Phone (580) 332-1444

Fax (580) 332-2532

dsovereign@kelloggllc.com