
**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Federal-State Joint Board on Universal Service) CC Docket No. 96-45
)
High-Cost Universal Service Support) WC Docket No. 05-337
)
)
)
To: The Commission

COMMENTS OF DOBSON CELLULAR SYSTEMS, INC.

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SUMMARY

Dobson urges the Commission to reform the non-rural high-cost support mechanism in a manner that is consistent with Dobson's principles for wholesale high-cost reform. These include the use of forward-looking costs of service as the basis for support and the unification of the current patchwork of mechanisms, eliminating the distinctions between rural and non-rural carriers and incumbents and new entrants. The size of the fund also must be minimized in a competitively neutral manner.

This approach should guide the Commission's application of the principles in Section 254(b), as required by the Tenth Circuit. The Commission's consideration of *affordability* should center on the avoidance of excessive subsidization, consistent with the court's guidance. SBC's affordability benchmark proposal may form a useful basis for dialogue as a way to identify areas where lower support levels will not affect consumers' ability to afford services. The *deployment of advanced telecommunications and information services* also is an important principle. The Commission must acknowledge the important role that wireless carriers like Dobson play in the deployment of high-speed data services in rural areas, and ensure that support is available to help fund continued deployment.

In considering the *reasonable comparability* principle, the Commission may not focus solely on rates. Instead, it must recognize that the statute requires the comparability of both rates and services, including the competitive choice of wireless services available to urban consumers. To ensure *specific, predictable, and sufficient support*, the Commission should build on the non-rural high-cost mechanism's use of a forward-looking cost model as the basis for all high-cost support. Finally, the additional principle of competitive neutrality must be the cornerstone of the support mechanism in the competitive environment envisioned by the 1996 Act.

In considering reform of the support mechanism to apply these principles, the Commission should continue to base support on forward-looking costs. Rates may become a relevant part of the analysis, but should be compared to costs, objectively measured, in order to avoid inappropriate efforts (by carriers or states) to manipulate rates in order to inflate support. An appropriate economic analysis, however, is likely to convince the court that rates are a reasonable proxy for costs and a cost-based mechanism can ensure the statute's goals are fulfilled.

Finally, Dobson urges the Commission *not* to adopt a non-rural insular mechanism until it completes broad-scale reform of all of the high-cost support mechanisms.

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Dobson Cellular Systems, Inc. (“Dobson”) hereby responds to the Commission’s *Notice of Proposed Rulemaking* (“NPRM”)¹ seeking comment on addressing the United States Court of Appeals for the Tenth Circuit’s decision in *Qwest Corp. v. FCC* (“*Qwest II*”).² As described in more detail below, changes to the non-rural high-cost support mechanism should be consistent with Dobson’s broader recommendations for wholesale high-cost reform. Certain elements of the existing non-rural high-cost mechanism have been properly structured to promote competition and further the preservation and advancement of the universal service program. To the extent that some changes need to be made to the non-rural high-cost mechanism in response to the Tenth’s Circuit decision in *Qwest II*, those changes should seek to build upon this already sound structure, while simultaneously taking into consideration the other broad high-cost reforms that are currently being debated in pending rulemakings before the Commission.

¹ *Federal-State Joint Board on Universal Service, High-Cost Universal Service Support*, CC Docket No. 96-45, WC Docket No. 05-337, *Notice of Proposed Rulemaking*, FCC 05-205 (rel. Dec. 9, 2005).

² *Qwest Corp. v. FCC*, 398 F.3d 1222 (10th Cir. 2005) (“*Qwest II*”).

I. DOBSON SUPPORTS CHANGES TO THE NON-RURAL HIGH-COST MECHANISM THAT ARE CONSISTENT WITH BROADER UNIVERSAL SERVICE REFORMS

Through several pending proceedings, the Commission is in the process of considering fundamental reforms to the high-cost program, for both the rural and non-rural mechanisms, as well as possible reform to the overall administration and management of the universal service program.³ Comprehensive reform is needed with regard to all high-cost support mechanisms, and the Commission must take a comprehensive, “big picture” approach to such reform. While changes are perhaps more urgently needed in the rural mechanism,⁴ many of the principles that Dobson has advocated in the other pending universal service proceedings also apply to the issues before the Commission in this proceeding. Dobson believes that all changes to the high-cost

³ See, e.g., *Comprehensive Review of Universal Service Fund Management, Administration, and Oversight; Federal State Joint Board on Universal Service; Schools and Libraries Universal Service Support Mechanism; Rural Health Care Support Mechanism; Lifeline and Link-Up; Changes to the Board of Directors for the National Exchange Carrier Association, Inc.*, WC Docket No. 05-195, CC Docket No. 96-45, CC Docket No. 02-6, WC Docket No. 02-60, WC Docket No. 03-109, and CC Docket No. 97-21, *Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking*, 20 FCC Rcd 11308 (2005); *Federal-State Joint Board on Universal Service Seeks Comment on Proposals to Modify the Commission’s Rules Relating to High-Cost Universal Service Support*, CC Docket No. 96-45, *Public Notice*, 20 FCC Rcd 14267 (2005) (“*Reform Proposals Public Notice*”); *Federal-State Joint Board on Universal Service Seeks Comment on Certain of the Commission’s Rules Relating to High-Cost Universal Service Support*, CC Docket No. 96-45, *Public Notice*, 19 FCC Rcd 16083 (2004). These proceedings all speak to the Commission’s recognition of the broader need to reform USF, and, specifically, the high-cost program.

⁴ See Comments of Dobson Cellular Systems, Inc. and American Cellular Corporation, WC Docket No. 05-195, at 9-13 (filed Oct. 18, 2005) (“Dobson USF Administration Comments”); Comments of Dobson Cellular Systems, Inc. on Joint Board Proposals for High-Cost Universal Service Reform, CC Docket No. 96-45, at 2-11 (filed Sept. 30, 2005) (“Dobson Reform Proposals Comments”); Comments of Dobson Cellular Systems, Inc. on Certain of the Commission’s Rules Relating to High-Cost Universal Service Support, CC Docket No. 96-45, at 2-4 (filed Oct. 15, 2004) (“Dobson High-Cost Rules Comments”).

program and universal service generally should take into consideration the following general principles:

- Support should be based on the forward-looking cost of the most efficient technology.⁵
- Support should come from a unified mechanism, rather than a patchwork of different mechanisms.⁶
- Costs should be calculated on a statewide basis.⁷
- Distinctions should be eliminated between rural and non-rural carriers and between incumbents and new entrants.⁸
- Support should be available on a non-discriminatory and competitively neutral basis to all providers in high-cost areas.⁹
- The overall size of the fund should be minimized in a competitively neutral manner.¹⁰

As discussed in greater detail in the remainder of these comments, each of the above principles is relevant to the Commission's effort on remand with respect to the non-rural high-cost mechanism.

⁵ See Dobson USF Administration Comments at 9-10; Dobson Reform Proposals Comments at 2-8; Dobson High-Cost Rules Comments at 6-8.

⁶ Dobson USF Administration Comments at 9-10; Dobson Reform Proposals Comments at 2-8.

⁷ Dobson Reform Proposals Comments at 8-10.

⁸ *Id.* at 10-11.

⁹ See, e.g., *id.* at 18-19; Dobson USF Administration Comments at 3-6, 11-13.

¹⁰ Reply Comments of Dobson Cellular Systems, Inc. and American Cellular Corporation, WC Docket No. 05-195, at 2-5 (filed Dec. 19, 2005) ("Dobson USF Administration Reply Comments").

II. THE COMMISSION MUST CORRECTLY APPLY PRINCIPLES SET FORTH IN SECTION 254(b) IN DETERMINING WHEN SUPPORT IS “SUFFICIENT”

In accordance with the court’s direction, the Commission seeks comment on balancing the principles set forth in Section 254(b) to determine the definition of “sufficient.”¹¹ In deciding how to balance the factors in Section 254(b), the court noted that the Commission could give greater weight to one factor over another.¹² In keeping with the broad universal service reform principles Dobson set forth above, it believes that the Commission should define “sufficient” by giving greater weight to principles that promote competition and lead to a reduced fund size – both of which will best serve the purpose of preserving and advancing universal service.

Affordability. Dobson supports an approach to the affordability principle in Section 254(b)(1) that ensures that the fund is no larger than necessary and that steps are taken to minimize the current size of the fund.¹³ In *Qwest II*, the Tenth Circuit reiterated its previous finding that “excessive subsidization arguably may affect the affordability of telecommunications services, thus violating the principle in § 254(b)(1).”¹⁴

¹¹ *NPRM* at ¶ 8. The Commission does not need to consider as part of its definition of sufficient the principles in Section 254(b) that clearly do not apply to the calculation of high-cost support, such as Section 254(b)(4), regarding equitable and non-discriminatory contributions, and Section 254(b)(6), regarding access to advanced telecommunications services to schools, libraries and health care facilities.

¹² *Qwest II*, 398 F.3d at 1234 (citing *Qwest Corp. v. FCC*, 258 F.3d 1191, 1200 (10th Cir. 2001) (“*Qwest I*”).

¹³ See Dobson USF Administration Reply Comments at 2-5.

¹⁴ *Qwest II*, 398 F.3d at 1234 (citing *Qwest I*, 258 F.3d at 1200).

In keeping with this rationale, Dobson supports creation of an affordability benchmark, and believes that SBC's proposal is a good starting point for a dialogue.¹⁵ Although it may not be the only factor that the Commission employs in a definition of "affordability", SBC's proposal to use median household income within a particular geographic area (*e.g.*, a county) to create an affordability benchmark may have merit. Under SBC's proposal, the non-rural high-cost mechanism would provide support for geographic areas where the forward-looking cost of providing service exceeds the affordability benchmark.¹⁶ Such an approach could reduce the overall size of the fund by redirecting support away from areas where the median income is high enough to suggest that a lower level of support will not affect consumers' ability to afford service.¹⁷ If service is affordable to certain persons or areas of the country with lower levels of support, or entirely without support, then providing additional support would violate that aspect of the affordability principle that counsels against excessive subsidization.

Access to advanced telecommunications and information services. Dobson supports, as a measure of sufficiency, consideration of whether carriers have adequate funding to upgrade

¹⁵ *NPRM* at ¶ 10 and n.41 (citing SBC Comments, CC Docket No. 96-45, at 12-15 (filed Apr. 10, 2002)).

¹⁶ *Id.*

¹⁷ Low income consumers in these areas would still receive support under the Commission's Lifeline program. As of March 2004, an average of 97.7% of Americans with income over \$73,000 had telephone service. On the other hand, telephone penetration declines progressively along with income: 96.7% penetration for incomes of \$54,750 to \$73,000; 95.3% penetration for incomes of \$36,500 to \$54,750; 93.2% for incomes of \$18,250 to \$36,500; and 88% for those with incomes below \$18,250. Telephone Penetration by Income by State, Industry Analysis and Technology Division, Wireline Competition Bureau, Table 4, *available at* http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/IAD/pntris04.pdf (income figures based on conversion to 2004 dollars and rounded to nearest \$50 increment). These statistics demonstrate that, to ensure affordability, Commission should target universal service funding to those with lower incomes.

their networks in order to provide advanced services. As the Commission stated in the *NPRM*, even though the current universal service mechanism does not support the deployment of advanced telecommunications and information services, “the use of high-cost support to invest in infrastructure capable of providing access to advanced services is not inconsistent with the requirement in section 254(e) that support be used ‘only for the provision, maintenance, and upgrading of facilities and services for which support it intended.’”¹⁸ Funding for the deployment of networks that can provide advanced telecommunications and information services is particularly important in rural areas since there is not an adequate mass of population for the market to justify the build-out of such networks without support.

Sometimes, even without the needed support, wireless carriers are deploying advanced services to rural areas to meet growing consumer demands. In its recent comments on the state of CMRS competition, CTIA provided a list of carriers that serve primarily rural and/or sparsely populated areas that are rolling out advanced services.¹⁹ Dobson itself has brought significant advanced services to rural areas through deployment of its GPRS and EDGE high-speed data networks. These technologies allow consumers to use mobile data devices such as Blackberrys and to obtain mobile high-speed access to the Internet. Because of the enormous benefits to consumers from advanced services, the Commission’s effort to provide for the sufficiency of the fund must ensure that funding is available to all carriers – including wireless carriers – that are

¹⁸ *NPRM* at ¶ 12 (citation omitted).

¹⁹ See Comments of CTIA – The Wireless Association™ (“CTIA”), WT Docket No. 06-17, at 22-25 (filed Feb. 17, 2006). CTIA highlighted the new technologies being deployed by the following carriers: Alaska Communications Systems; Alltel; Cellular One of Amarillo; Cellular South; U.S. Cellular; Bluegrass Cellular; Cellcom; Edge Wireless; First Cellular of Southern Illinois; Highland Cellular; Midwest Cellular; NTELOS; and Rural Cellular Corporation (Unicel). *Id.* at 15-16 and n.55.

aggressively trying to meet consumer demands by deploying advanced services in high-cost areas.

Reasonable Comparability. In its consideration of the sufficiency of support, the Commission must ensure that reasonably comparable services are provided to consumers in urban and rural areas. It is just as important for rural consumers to have access to high quality, ubiquitous wireless services as it for urban consumers. In fact, wireless service is even more important to rural consumers, as it often serves as the only connection between these consumers and public safety officials while they are away from their homes. Rural consumers often drive longer distances to work, school and shopping, such that they are away from a wireline connection (even a payphone) for longer amounts of time, making the mobility of wireless service key to staying connected to family, friends and, in particular, emergency personnel. In re-evaluating the support mechanism's compliance with both the sufficiency and the reasonable comparability requirements, the Commission must ensure that the support mechanism will advance rural consumers' ability to choose wireless service, and from a choice of providers, in the same manner that urban consumers do.

Specific, predictable and sufficient support. Section 254(b)(5) states that “[t]here should be specific, predictable, and sufficient Federal and state mechanisms to preserve and advance universal service.”²⁰ The court determined that Commission must, in crafting a specific, predictable and sufficient federal non-rural support mechanism, consider both the preservation *and* advancement of universal service.²¹

²⁰ *NPRM* at ¶ 15 (citing 47 U.S.C. § 254(b)(5)).

²¹ *Qwest II*, 398 F.3d at 1237.

The only way to preserve and advance the universal service mechanism in a specific and predictable way is to utilize a unified, forward-looking mechanism. Such a mechanism is currently being used for the non-rural high-cost program, and should be retained.²² As the Commission has recognized, a forward-looking mechanism encourages competitive entry and promotes efficiency by requiring carriers to be “more disciplined in planning their investment decisions.”²³ Additionally, the high-cost mechanism is administered more efficiently if there is one, unified mechanism, because managing separate programs imposes unnecessary costs and burdens on carriers, the administrator and regulators.²⁴ For these reasons, Dobson supports use of a single, unified forward-looking mechanism for all universal service support, non-rural and rural, to ensure the preservation and advancement of specific, predictable and sufficient support.

Additional principles. Competitive neutrality must be the cornerstone of any universal service mechanism.²⁵ As the Commission noted in its first decision on universal service, it is important that “universal service support mechanisms and rules neither unfairly advantage nor disadvantage one provider over another, and neither unfairly favor nor disfavor one technology

²² Carriers under the rural mechanism receive support through five separate programs based on their embedded costs. Although not relevant to this proceeding regarding the non-rural mechanism, Dobson has argued that the Commission must take steps to begin converting rural carriers to a unified, forward-looking mechanism, and that the FCC should reform all aspects of high-cost support. See Dobson High-Cost Rules Comments at 6-8.

²³ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, 12 FCC Rcd 8776, 8936 (1997) (subsequent history omitted) (“*First Universal Service Report and Order*”).

²⁴ Dobson USF Administration Comments at 9-10; Comments of CTIA – The Wireless Association™, WC Docket No. 05-195, at 9-10 (filed Oct. 18, 2005).

²⁵ *NPRM* at ¶ 17 (“In determining whether non-rural high-cost support is sufficient, to what extent should the Commission determine that such support is competitively neutral?”)

over another.”²⁶ The Commission added that its intention for incorporating the principle of competitive neutrality into universal service was to “facilitate a market-based process whereby each user comes to be served by the most efficient technology and carrier.”²⁷

A competitively neutral universal service mechanism leaves the choice to the consumer and therefore keeps the Commission from having to make the impossible decision as to which provider or technology best suits a consumer in a high-cost area. Any decision to abandon competitive neutrality would disadvantage customers and cut against the clear intent of Congress to promote a pro-competitive, deregulatory national policy framework.²⁸ Competitive neutrality is thus a necessary pillar in the formulation of a sufficient high-cost support mechanism.

III. FORWARD-LOOKING COSTS MUST REMAIN THE BASIS OF NON-RURAL HIGH-COST SUPPORT

Certain elements of the existing non-rural high-cost funding mechanism are based on sound policies that further competition and ensure the preservation and advancement of the universal service fund and, therefore, should be reaffirmed by the Commission. When it decided to base non-rural high-cost support mechanisms on forward-looking costs and to estimate those costs using a single national model, the Commission sought to further competition by “send[ing] the correct signals for entry, investment, and innovation in the long run.”²⁹ Additionally, the

²⁶ *Universal Service First Report and Order*, 12 FCC Rcd at 8801.

²⁷ *Id.* at 8802.

²⁸ See Preamble, Telecommunications Act of 1996, P.L. 104-104, 100 Stat. 56 (1996) (enacting 1996 Act “to promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies”).

²⁹ *Federal-State Joint Board on Universal Service, Access Charge Reform*, CC Docket Nos. 96-45 and 96-262, *Seventh Report & Order and Thirteenth Order on Reconsideration in CC Docket* (continued on next page)

Commission’s decision to calculate support levels for non-rural carriers by comparing the forward-looking costs of providing supported services, averaged at the statewide level, is consistent with the federal role to ensure reasonable comparability of rates *among* states.³⁰ In fact, as noted above, Dobson supports these elements – use of one, unified forward-looking high-cost mechanism with costs averaged on a statewide basis – for *all* carriers, non-rural and rural.

Although, on remand, the Commission should re-affirm its decision to consider carriers’ costs in calculating support, there may be ways to incorporate carriers’ rates into the analysis as well.³¹ A purely rate-based mechanism may face considerable challenges, including the prospect of state commissions or carriers themselves using the rate-setting process as an opportunity to maximize support inappropriately.³² To alleviate these concerns, if the Commission decides to move to a rate-based mechanism, it should compare a carrier’s rates to the efficient cost of service as part of the mechanism.

Use of a rate-based funding mechanism, however, may not be necessary. The Commission may be able to continue using its cost-based mechanism consistent with the Tenth Circuit’s decision. In *Qwest II*, the court stated that it “intimate[d] in *Qwest I* that we would be

No. 96-45, Fourth Report & Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking, 14 FCC Rcd 8078, 8103 (1999) (“*Seventh Report & Order*”) (citing *Universal Service First Report and Order*, 12 FCC Rcd at 8899, 8927); *see also Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Ninth Report & Order and Eighteenth Order on Reconsideration*, 14 FCC Rcd 20432, 20434-35 (1999) (“*Ninth Report & Order*”).

³⁰ *Ninth Report & Order*, 14 FCC Rcd at 20457-58.

³¹ *See NPRM* ¶¶ 24-26.

³² As the Commission noted in the *NPRM*, “there are urban and suburban areas that have rates that would likely exceed any rate benchmark that the Commission would set.” *NPRM* at ¶ 25. To know whether to fund carriers serving these areas, the Commission must have some sense of the carrier’s costs to determine if the rates were arbitrarily set.

inclined to affirm the FCC’s cost-based funding mechanism if it indeed resulted in reasonably comparable rates,” but the Commission did not provide empirical evidence “to support [its] pairing of rates to costs ...”³³ If the Commission can provide evidence that shows that rates do in fact follow costs, than such a funding mechanism should satisfy the court’s concerns.

This is another reason why it is important for the high-cost support mechanism to remain consistent with a competitive environment. Basic economic principles – upon which the Commission has consistently relied in multiple proceedings – demonstrate that a carrier operating in a competitive environment has “incentives to offer service at rates based on its own costs (including a reasonable, but not supracompetitive, profit).”³⁴ Thus, the Commission should be able to demonstrate, with the assistance of objective data, that a cost-based mechanism can still be effective at ensuring reasonably comparable rates.

IV. THE COMMISSION SHOULD NOT ADOPT AN INSULAR, NON-RURAL SUPPORT MECHANISM UNTIL IT COMPLETES THE PENDING PROCEEDINGS REGARDING BROADER UNIVERSAL SERVICE REFORM

Dobson cannot support the adoption of a non-rural insular mechanism at this time. The Commission currently is in the process of considering several key reforms to the high-cost program, including changes to the administration and management of the universal service

³³ *Qwest II*, 398 F.3d at 1237 (citation omitted).

³⁴ *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, *Order on Remand*, 20 FCC Rcd 2533, 2629 (2005); *International Settlements Policy Reform International Settlement Rates*, IB Docket Nos. 02-324, 96-261, *First Report and Order*, 19 FCC Rcd 5709, 5711 (2004) (“We continue to believe that, where there is vigorous competition, market forces are causing international termination rates to move toward cost on many routes.”); *Seventh Report & Order*, 14 FCC Rcd at 8093 (“We conclude that the underlying assumption in the Joint Board’s recommendation – that a relationship exists between high costs and high rates – is a sound one, because rates are generally based on costs.”).

program more generally.³⁵ Commission action in any of these pending proceedings could have a fundamental impact on the high-cost program that could even eliminate the necessity of a non-rural insular mechanism. For example, the Commission has sought comment on high-cost reform proposals that seek to eliminate the distinctions between rural and non-rural carriers, which would permit support to be targeted where it is needed, regardless of whether the carrier needing support is rural or non-rural.³⁶ Dobson has supported the elimination of such distinctions.³⁷ In this same proceeding, Dobson also supported a proposal to determine support based on the costs of the most efficient technology, which also has the effect of eliminating the distinction between rural and non-rural carriers.³⁸ Until the Commission considers these broader reforms to the high-cost program, it should decline to create a non-rural insular mechanism.

³⁵ *See supra* n.3.

³⁶ *Reform Proposals Public Notice*, 20 FCC Rcd at 14278, 14282.

³⁷ Dobson Reform Proposals Comments at 10-11.

³⁸ *Id.*

CONCLUSION

The Commission should re-assess its non-rural high-cost support mechanism, per the remand, consistent with the principles outlined herein. In addition, the Commission should not adopt a new non-rural insular support mechanism, but instead should consider such issues as part of wholesale high-cost reform.

Respectfully submitted,

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