

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems)	CC Docket No. 94-102
)	
Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones)	WT Docket No. 01-309
)	

To: The Commission

**REPLY COMMENTS OF
CTIA – THE WIRELESS ASSOCIATION®**

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SUMMARY

CTIA – The Wireless Association[®] (“CTIA”) observes that the record here shows no compelling need to disrupt the market-oriented, flexible-use spectrum policies that currently apply to the 700 MHz Band or to upend the regulatory parity that exists among Part 27 licensees – including Advanced Wireless Service licensees and 700 MHz Band licensees. In large part, therefore, the Commission should leave the 700 MHz Band licensing and service rules unchanged. Instead, the Commission should proceed quickly with this and other open 700 MHz proceedings so that it can hold an auction of the 700 MHz spectrum in a timely manner.

CTIA limits its reply comments to respond to specific proposals or comments that seek to replace today’s highly successful market-oriented spectrum policies with a return to command-and-control licensing and service rules. Specifically:

- The record contains no factual basis to impose more stringent performance requirements and revert back to command-and-control build-out requirements or “keep what you use” spectrum take-backs. While CTIA has raised questions regarding whether any performance requirement is justified, the Commission should at most preserve the substantial service requirement and maintain the regulatory parity that exists among Part 27 licensees. As one commenter notes, the proposals “assume that every area merits service on each license according to the identical timetable.” This assumption is incorrect, as it removes all decisionmaking from the competitive market, the same market that has driven down prices and increased service offerings. The current rules give licensees greater flexibility that allows them to take into account variances in the competitive landscape, population density, and other important demographics pertaining to particular services and licenses. If the Commission wants to adopt additional policies to foster more wireless deployment in rural areas, especially in areas where it is currently uneconomic to build out, universal service support represents the best public policy – not forced premature or uneconomic construction.
- The Commission should revise the current power limit definitions to include a power spectral density limit so that all technologies, regardless of their bandwidth, are treated equally. As CTIA observed in the pending *2002 Biennial Review* proceeding, the current Broadband PCS and Part 27 base station power limits force wireless providers using wider bandwidth carrier channels to operate at lower total power than is allowed for multiple narrower-bandwidth carriers. Wideband operations should not be penalized.
- The Commission should reject calls for a spectrum set-aside and mandated unlicensed operations or easements. These command-and-control proposals are poor public policy and would constrain the potential for the 700 MHz Band.

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To: The Commission

**REPLY COMMENTS OF
CTIA – THE WIRELESS ASSOCIATION®**

CTIA – The Wireless Association® (“CTIA”) hereby replies to the initial comments filed in the above-captioned rulemaking.¹ The record shows that there is no compelling need to disrupt the market-oriented, flexible-use spectrum policies that currently apply to the 700 MHz Band (the 698-746, 747-762 and 777-792 MHz bands) or to upend the regulatory parity that exists among Part 27 licensees – including Advanced Wireless Service licensees and 700 MHz Band licensees. In large part, therefore, the Commission should leave the 700 MHz Band licensing and service rules unchanged.

¹ *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones, WT Docket No. 06-150, et al., Notice of Proposed Rule Making, Fourth Further Notice of Proposed Rule Making, and Second Further Notice of Proposed Rule Making, FCC 06-114 (rel. Aug. 10, 2006) (“Notice”).*

CTIA limits its reply comments to respond to specific proposals or comments that seek to replace today's highly successful market-oriented spectrum policies with a return to command-and-control licensing and service rules. The record contains no evidence of market failure to justify such a radical shift in spectrum policy. The Commission therefore should refrain from imposing more stringent performance requirements, including "keep what you use;" it should define power limits in a technology neutral way that does not disadvantage certain technologies; and it should reject calls to adopt a spectrum set-aside or to mandate unlicensed operations or easements in the 700 MHz Band.

I. THE COMMISSION MUST RESOLVE THIS PROCEEDING EXPEDITIOUSLY IN LIGHT OF THE AUCTION MANDATE

As an initial matter, the Commission should proceed quickly to complete each of the 700 MHz proceedings in a timely manner to facilitate prompt auction of the spectrum and deposit the proceeds in the Digital Television Transition and Public Safety Fund no later than June 30, 2009.²

Some commenters have seized the opportunity presented by the *Notice* to advance far-reaching proposals that would substantially alter licensing, service and technical rules and impact deployment and services in the 700 MHz Band. CTIA cautions against a protracted proceeding that could affect the timing of the auction, as well as statutory deadlines. As Verizon Wireless states, the Commission should "move quickly to auction the 700 MHz band" and should avoid "substantial changes to the rules [that] would jeopardize the Commission's ability

² Deficit Reduction Act of 2005, Pub. L. No. 109-171, 120 Stat. 4 (2006).

to meet its statutory obligation” to commence the auction and deposit the proceeds according to Congress’ timetable.³

II. THE RECORD CONTAINS NO FACTUAL BASIS TO IMPOSE MORE STRINGENT PERFORMANCE REQUIREMENTS AND ANY NEW OBLIGATION WOULD CREATE MORE PROBLEMS THAN IT SOLVES

Commenters large and small urge the Commission to retain the Part 27 substantial service performance requirement that currently applies to the 700 MHz Band and refrain from imposing construction benchmarks or a “keep what you use” spectrum take-back policy.⁴ Although CTIA has raised questions regarding whether *any* performance requirement is justified, the Commission should at most preserve the substantial service requirement and maintain the regulatory parity that exists among Part 27 licensees.

After review of the initial comments, CTIA again observes it is unclear what problems the proposals would remedy. The record does not warrant reversing the Commission’s announced preference for substantial service and reverting back to command-and-control build-out requirements or spectrum take-backs. To the contrary, wireless deployment in rural areas continues to expand. Although there certainly are many high-cost, rural areas that would benefit from more, explicit universal service support directed to wireless carriers, the just-released 11th CMRS Competition Report finds that 98 percent of Americans live in counties

³ Comments of Verizon Wireless, WT Docket No. 06-150 *et al.*, at 3, 1 (filed Sept. 29, 2006) (“Verizon Wireless Comments”). Verizon Wireless further notes that revised rules could risk reducing the value of the spectrum, and Congress has already dedicated billions of dollars in auction proceeds for the DTV transition and important Homeland Security programs in reliance on Congressional Budget Office auction revenue estimates based on the current rules. *Id.* at 2.

⁴ *See, e.g.*, Comments of Cingular Wireless LLC, WT Docket No. 06-150 *et al.*, at 9-13 (filed Sept. 29, 2006) (“Cingular Comments”); Comments of Dobson Communications Corp., WT Docket No. 06-150 *et al.*, at 4-10 (filed Sept. 29, 2006) (“Dobson Comments”); Comments of MetroPCS Communications, Inc., WT Docket No. 06-150 *et al.*, at 15-16 (filed Sept. 29, 2006) (“MetroPCS Comments”); Comments of (continued on next page)

served by three or more mobile wireless providers – a figure that continues to increase year-over-year.⁵ Further – and of significant import here – no party offers evidence that demand for spectrum in rural areas is unmet or that spectrum access is limited.

MetroPCS correctly identifies the problem with an FCC-imposed, arbitrarily drawn performance requirement – namely, “such requirements assume that every area merits service on each license according to the identical timetable.”⁶ As Verizon Wireless notes, “it is not necessary for all licensees to offer service in all areas.”⁷ Rather than a command-and-control approach, MetroPCS states that the current Part 27 substantial service requirement “[g]iv[es] licensees greater flexibility [that] allows them to take into account variances in the competitive landscape, population density, and other important demographics pertaining to particular services and licenses.”⁸ These elements all factor into the decisionmaking process of a competitive market. The Commission has correctly stated in the past that licensees should not be expected to build out where it would be “economically unsustainable” to do so.⁹

The *Notice* acknowledges “there will be certain rural areas that are very difficult to serve because of high equipment costs, low population density, or other economic factors.”¹⁰ Yet a policy of government-imposed, forced investments “not predicated on economic responses to market forces” would result in uneconomic and unsustainable deployment – “potentially

United States Cellular Corp., WT Docket No. 06-150 *et al.*, at 12-18 (filed Sept. 29, 2006) (“U.S. Cellular Comments”); Verizon Wireless Comments at 6-10.

⁵ See Dobson Comments at 6 (citing *Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, WT Docket No. 06-17, *Eleventh Report*, FCC 06-142, at ¶ 2 (rel. Sept. 29, 2006)).

⁶ MetroPCS Comments at 15.

⁷ Verizon Wireless Comments at 6.

⁸ MetroPCS Comments at 15.

⁹ See *Rural Wireless Report and Order*, 19 FCC Rcd at 19122.

stranding capital investment in markets where it is not justified and limiting competitors from fully investing in markets where it is.”¹¹ Requiring carriers to internally subsidize the deployment of networks in less profitable, higher-cost areas with revenues from services provided in more profitable, lower-cost areas, where carriers are more likely to be subject to competitive pressures, undermines the economically efficient development of competition.¹² For that reason, the kinds of implicit subsidization that “keep what you use” regulations would require are prohibited by section 254(e) of the Act.¹³ Where appropriate, the Commission does have discretion to direct explicit universal service subsidies to facilitate deployment of wireless networks in areas presenting particular economic challenges.

In addition, new rules applied in the 700 MHz Band “would be in direct conflict with Congressional and Commission findings that a symmetrical regulatory structure best serves the public interest.”¹⁴ Section 332 of the Communications Act mandates that similar commercial mobile radio services be accorded similar regulatory treatment. As the Commission concluded, “[t]he broad goal of this [provision] is to ensure that economic forces – not disparate regulatory burdens – shape the development of the CMRS marketplace.”¹⁵ Parties identify specific examples demonstrating how asymmetric regulation of Part 27 licenses would result in practical problems. C&W Enterprises, a current Part 27 licensee, observes that new performance

¹⁰ Notice at ¶ 29 (quoting *Rural Wireless Report and Order*, 19 FCC Rcd at 19089).

¹¹ *Id.* at 7-8.

¹² In addition, imposing stringent build out requirements would disadvantage rural carriers who have a smaller customer base to spread these costs across.

¹³ See 47 U.S.C. § 254(e); see also *COMSAT Corp. v. FCC*, 250 F.3d 931, 938-40 (5th Cir. 2001) (the Commission can neither require implicit subsidies nor permit them).

¹⁴ Verizon Wireless Comments at 8.

¹⁵ *Implementation of Sections 3(n) and 332 of the Communications Act*, Third Report and Order, 9 FCC Rcd 7988, 7994, 8002-3 (1994) (quoted in Verizon Wireless Comments at 8-9).

requirements for 700 MHz Band licenses could “compromise an operator’s system” by imposing different requirements even though it may use “these different spectrum groups [] to provide service through one system.”¹⁶ MetroPCS raises a separate but related concern – adoption of new requirements in the 700 MHz Band would disproportionately affect new entrants, which lack the network infrastructure that incumbents can rely on to meet a geographic or population benchmark that applies to a new channel.¹⁷

CTIA remains strongly opposed to any form of a “keep what you use” regime. As Cingular states, the record offers no evidence warranting a policy of spectrum take-backs.¹⁸ OPASTCO asserts that a “triggered keep what you use” policy would “encourage the efficient use of spectrum while also promoting the spread of innovative wireless services to additional rural consumers.”¹⁹ Neither of OPASTCO’s claims is accurate. First, licensees may feel compelled to make premature and uneconomic investments to retain rights to the spectrum – a highly *inefficient* result. Second, as U.S. Cellular notes, “in a world of national and regional carriers, tiny one or two cell systems constructed in areas left unserved after an initial build out period make little economic sense, which is why there are so few of them.”²⁰ Third, given the technological flexibility in the 700 MHz Band rules and the wide variety of possible uses, it would be extremely difficult to define what is “used.”²¹ As Dobson explains, “it would take

¹⁶ C&W Enterprise Comments at 4.

¹⁷ See MetroPCS Comments at 15.

¹⁸ Cingular Comments at 12.

¹⁹ Comments of the Organization for the Promotion and Advancement of Small Telecommunications Companies, WT Docket No. 06-150 *et al.*, at 5 (filed Sept. 29, 2006).

²⁰ U.S. Cellular Comments at 13.

²¹ For example, a base station that could provide service to handheld units within five miles might be able to serve fixed receivers with antennas mounted on silos or the second story of a farm building at fifty miles. A wireless system that incorporates peer-to-peer networking or mobile base stations could use the entire licensed region – albeit intermittently.

years of protracted rulemaking to reach an industry consensus on what constitutes, even for existing technologies, an appropriate standard of ‘coverage’” in a “keep what you use” regime.²² At its most fundamental, “keep what you use” would “interfere with natural market forces by creating an incentive for prospective lessees or purchasers to wait for spectrum rather than seek it out in secondary markets.”²³

III. THE COMMISSION SHOULD MODIFY HOW BASE STATION POWER LIMITS ARE DEFINED TO PROVIDE FOR TECHNOLOGICAL NEUTRALITY

The Commission should revise the current power limit definitions to include a power spectral density limit “so that all technologies, regardless of their bandwidth, are treated equally.”²⁴ As CTIA observed in the pending *2002 Biennial Review* proceeding, the current Broadband PCS and Part 27 base station power limits force wireless providers using wider bandwidth carrier channels to operate at lower total power than is allowed for multiple narrower-bandwidth carriers.²⁵ Specifically, these power limits are interpreted to place a limit on the power of a single carrier but permit multiple carriers to be transmitted from a single base station. As a result, systems operating in smaller bandwidths are permitted to operate at higher power spectral density than those operating in wider bandwidths. Such wideband channels, moreover, are not just a theoretical possibility – WCDMA is a 5 MHz system and WiMAX (which could be deployed in the 700 MHz Band) includes system configurations with 5, 7 and

²² Dobson Comments at 9.

²³ Cingular Comments at 13.

²⁴ Comments of Motorola, Inc., WT Docket No. 06-150 *et al.*, at 10 (filed Sept. 29, 2006) (“Motorola Comments”).

²⁵ *See, e.g.*, Letter from Paul Garnett, Director, CTIA, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 03-264, at 2 (filed Feb. 7, 2005).

10 MHz channels.²⁶ Aloha Partners correctly states that wideband operations should not be penalized and that a power spectral density alternative “is both equitable and can be provided without any risk of interference.”²⁷

The current rule increases the costs of deployment for wider carrier channels without any corresponding improvements to service quality and/or coverage. As Motorola states, “[s]uch an approach is particularly inappropriate when trying to promote effective broadband systems and new technologies.”²⁸ The additional costs are especially problematic for carriers attempting to deploy in rural areas.

CTIA has put forth an industry-consensus proposal that is still pending in the *2002 Biennial Review* proceeding.²⁹ Specifically, CTIA proposes to modify the Parts 24 and 27 base station power limits to allow carriers to operate consistent with either the current rules or a power spectral density constraint (excluding application to the Part 27 BRS/EBS service, which has a different power limit, unique coordination issues, and is undergoing a significant transition).³⁰ CTIA urges the Commission to act in this proceeding to revise Section 27.50 to include a power spectral density limit for the 700 MHz Band and extend the same approach to other commercial wireless services as quickly as possible.

²⁶ See, e.g., http://www.wimaxforum.org/news/downloads/Initial_profiles_final.pdf.

²⁷ Comments of Aloha Partners, L.P., WT Docket No. 06-150 *et al.*, at 11 (filed Sept. 29, 2006); see also Comments of MilkyWay Broadband, LLC, WT Docket No. 06-150 *et al.*, at 9 (filed Sept. 29, 2006).

²⁸ Motorola Comments at 10.

²⁹ See e.g., Comments of CTIA – The Wireless Association®, WT Docket No. 03-264 (filed Dec. 19, 2005).

³⁰ CTIA notes a recent filing by Ericsson Inc, which explains why quick action is warranted. “[W]inning bidders in the Advanced Wireless Service auction are beginning to contemplate network designs. It is critical that the Commission update its power limits now so that industry can design the location and number of base stations for networks.” Letter from Mark Racek, Director, Ericsson Inc *et al.* to Marlene H. Dortch, Secretary, FCC, WT Docket No. 03-264, at 1 (filed Oct. 17, 2006).

IV. THE COMMISSION SHOULD REJECT CALLS FOR A SPECTRUM SET-ASIDE AND MANDATED UNLICENSED OPERATIONS OR EASEMENTS

Some commenters propose that the Commission set aside spectrum in the 700 MHz Band for an entrepreneur's block and others seek to impose mandated unlicensed operations or underlay easements in the band. The Commission should reject these command-and-control proposals as poor public policy that would constrain the potential for the 700 MHz Band.

Just last year, the Commission affirmed that the 1.7/2.1 GHz Advanced Wireless Service auction would be open and noted that in recent years it “has refrained from establishing small business set-asides like those adopted in PCS,” citing to “the record of success of designated entities [DEs] in auctions without set-asides.”³¹ It pointed to specific examples in the Multichannel Video Distribution and Data Service and the Lower 700 MHz Band auctions, where DEs successfully participated “even in the absence of a spectrum set-aside.”³²

The results of the recent AWS auction further demonstrate that even without set-asides, small companies continue to have an opportunity to participate and win licenses in spectrum auctions.³³ As the Commission recently reported to the U.S. Court of Appeals for the Third

³¹ See *Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands*, Order on Reconsideration, 20 FCC Rcd 14058, 14074-75 (2005) (“1.7/2.1 AWS Order on Reconsideration”); see also *Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands*, Report and Order, 18 FCC Rcd 25162, 25189 (2003) (“We do not see a need to supplement the incentives for small business participation provided elsewhere in this order by foreclosing any of the licenses to other bidders.”).

³² *1.7/2.1 AWS Order on Reconsideration*, 20 FCC Rcd at 14074.

³³ See 47 U.S.C. § 309(j)(4)(D). Although NTCA urges the Commission to set-aside spectrum exclusively for small businesses to “ensur[e] that Section 309(j)’s Congressional objective is achieved,” Comments of the National Telecommunications Cooperative Association, WT Docket No. 06-150 *et al.*, at 11 (filed Sept. 29, 2006) (“NTCA Comments”), the Commission has long held that “Section 309(j) does not mandate the use of set-asides, or any other particular method, to promote the participation of small businesses in spectrum auctions.” *Amendment of the Commission’s Rules Regarding Installment Payment Financing for Personal Communications Services (PCS) Licensees*, Sixth Report and Order and Order on Reconsideration, 15 FCC Rcd 16266, 16278 (2000).

Circuit, “by any objective standard, DEs participated substantially in the AWS auction. DEs comprised 100 out of the 168 qualified bidders and 57 of the 104 total winning bidders. And two DEs . . . placed among the top ten bidders” in the AWS auction.³⁴

Here the Commission should continue its practice of offering bidding credits rather than imposing eligibility restrictions to encourage the participation of designated entities in competitive bidding. In addition, as the Commission also recognized in rejecting claims for spectrum set-asides, spectrum leasing policies and partitioning and disaggregation facilitate third parties’ ability to acquire spectrum usage rights in the after-market.³⁵ The Commission should reject the calls to foreclose any of the 700 MHz Band licenses to certain bidders.

Likewise, the Commission must reject the command-and-control proposal filed by Tropos Networks (“Tropos”), which proposes that some spectrum “be designated for contention based unlicensed operations” and licensees be required to “administer a contention based unlicensed spectrum environment.”³⁶ This proposal would dictate a particular business plan and is fundamentally inconsistent with the Commission’s policy favoring flexible-use in commercial spectrum and Section 27.2, which permits 700 MHz Band spectrum to be used for any service consistent with the band’s allocation. While Commission policy allows licensees to “facilitat[e] access for advanced technologies on an unlicensed basis,”³⁷ it would be imprudent for the Commission to compel any such business plan. Accordingly, CTIA urges the Commission to

³⁴ *Council Tree et al. v. Federal Communications Commission*, Brief for Respondents, No. 06-2943, at 44 (3d Cir. filed Oct. 13, 2006); see also NTCA Comments at 8-9 (acknowledging that 58 NTCA rural telephone company members were qualified bidders and 29 were successful winning bidders in the AWS auction).

³⁵ See *1.7/2.1 AWS Order on Reconsideration*, 20 FCC Rcd at 14075.

³⁶ Comments of Tropos Networks, WT Docket No. 06-150 *et al.*, at 10 (filed Sept. 29, 2006).

³⁷ *Promoting Efficient Use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets*, Second Report and Order, 19 FCC Rcd 17503, 17546-47 (2004).

reject the command-and-control proposal offered by Tropos and instead retain the flexible-use policy set forth in Part 27. Finally, the Commission should similarly reject the proposal to impose spectrum easements or underlays in the 700 MHz Band.³⁸ As CTIA has stated before, government-imposed underlay rights would perpetuate a command-and-control approach to regulation that would distort incentives for innovation and investment to the detriment of consumers.³⁹ The Commission should refrain from mandating the transfer of spectrum access rights from licensed operators to unlicensed underlay rights. It should instead retain its exclusive-use model and rely on its secondary markets policies to ensure highly efficient spectrum sharing.

V. CONCLUSION

CTIA urges the Commission to act quickly in this proceeding to ensure that the 700 MHz Band auction proceeds on a timely basis. Further, the Commission should continue its market-oriented, flexible-use spectrum policies, reject claims to impose more stringent performance requirements such as build-out obligations or “keep what you use,” modify the

³⁸ See Howard and Javed Comments at 31-37.

³⁹ See Reply Comments of Cellular Telecommunications and Internet Ass’n, ET Docket No. 03-237, at 5 (filed May 5, 2004).

power limit definition to provide for technological neutrality, and reject calls for spectrum set-asides or mandated unlicensed operations or easements.

Respectfully submitted,

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