

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
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Bank	)	PS Docket No. 06-229
	)	
Applications for the Public Safety Broadband License	)	DA 07-3885
	)	

**SUPPLEMENT TO REQUEST TO FURTHER SAFEGUARD**

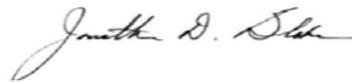
On September 20, 2007, Frontline Wireless, LLC, filed a “Request to Further Safeguard Public Safety Service.” That Request urged the Commission to “(1) adopt a ‘no profit, no loss’ framework to govern the fees collected from public safety users by the commercial operator of the Shared Network and (2) require the D Block winner to establish a not-for-profit subsidiary within the Operating Company to provide service to public safety agencies in accordance with this framework.” In this Supplement, Frontline submits the attached Declaration of Cheryl Parrino, former Chief Executive Officer of the Universal Service Administrative Company (USAC), former Chairman of Wisconsin’s Public Services Commission and President of the National Association of Regulatory Utility Commissioners. Her Declaration fleshes out and supports the proposals made in Frontline’s September 20 Request.

Specifically, Ms. Parrino's Declaration shows that:

- The no-profit, no-loss proposal and the proposal for a not-for-profit entity to provide network services to public safety agencies will benefit public safety, commercial users of the shared network and the general public.
- The proposal will assure that public safety agencies pay only the incremental capital and operating costs of the shared network.
- The proposed also ensures that the public safety community will obtain the benefit of the secondary use by commercial users of the spectrum it is contributing to the shared network.
- The absence of up front fees to public safety entities will facilitate their participation in the shared network, thereby driving down prices by encouraging demand.
- The proposal will help protect the economic viability of the shared network by having public safety fees reflect the incremental costs of the special features public safety wants in the network, e.g., hardening, more extensive coverage, and extra operational features.
- The proposed structure is consistent with past Commission-supervised structures, like USAC.
- The Commission also has extensive experience with overseeing cost accounting issues and assuring proper cost allocations.
- These proposals will assure transparency, accountability and integrity in the pricing of public-safety services on the shared network.

For these reasons, the Commission should adopt the no-profit, no-loss principle to govern the relationship between the D Block licensee and the Public Safety Broadband Licensee and public safety agencies generally. The country's police, firefighters and other public servants in the public safety field deserve no less.

Respectfully submitted,



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**Declaration of**  
**Cheryl L. Parrino**

I, Cheryl L. Parrino, hereby declare the following:

My name is Cheryl L. Parrino. I have been asked to provide an analysis of the “Not-for-Profit Structure” proposed by Frontline Wireless, LLC (Frontline) for the D Block Licensee (DBL), which was submitted to the Federal Communications Commission on September 20, 2007 as it relates to the services provided to public safety entities. I am familiar with Not-for-Profit structures and with accounting systems and safeguards through my experience as a consultant, the former CEO of the Universal Service Administrative Company, a former state commission Chairman and NARUC president, and a former state utility commission auditor.

### **Qualifications**

I am the President of Parrino Strategic Consulting Group (PSCG), a consulting firm specializing in telecommunications issues, mediation and arbitration, compliance policies and procedures, audit planning and review, and board governance issues. I received a Bachelor of Business Administration degree with a major in accounting from the University of Wisconsin. My curriculum vita is attached to this Declaration.<sup>1</sup>

Previously, I served as the Chief Executive Officer of the Universal Service Administrative Company (USAC), the corporation charged by the FCC with administering the Federal Universal Service Fund (USF) for all four universal service support mechanisms: High Cost, Low Income, Schools and Libraries, and Rural Health Care.

Prior to joining USAC I spent almost 22 years at the Public Service Commission of Wisconsin (Wisconsin Commission) and the last 7 years as Chairman. During my

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<sup>1</sup> See Attachment A.

tenure as chairman of the Wisconsin Commission, I was elected President of the National Association of Regulatory Utility Commissioners (NARUC) and served as a member of NARUC's Executive Committee, Board of Directors, and Communications Committee. Prior to becoming a commissioner, I held various other positions in the agency including Executive Assistant to the Chairman (Chief of Staff) and Director of the Bureau of Utility Audits.

## **Introduction**

In the words of Chairman Martin, "First and foremost, we have no greater responsibility than meeting the needs of public safety."<sup>2</sup> The creation of a nationwide, interoperable, 4G, broadband public safety network will be a historic event that will bring immeasurable benefits to the public. The importance of the network to the public calls for a system and structure that is transparent, assures integrity, and imposes accountability on all those responsible for providing service to the public safety community, the DBL in particular.

On September 20, 2007, Frontline filed a *Request to Further Safeguard Public Safety Service* requesting that the Commission adopt a "no profit, no loss" framework to govern the fees collected by the DBL from public safety entities and to require the DBL to establish a not-for-profit subsidiary within the Operating Company to provide these services.<sup>3</sup> The Frontline proposed framework focuses on the needs of public safety

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<sup>2</sup> *In the Matter of Service Rules for the 698-746, 747-762 and 777-792 MHz Bands et al.*, Second Report and Order, WT Docket No. 06-150 et al., 22 FCC Rcd. 15289, Statement of Chairman Kevin J. Martin at 292 (rel. Aug. 10, 2007) [hereinafter *700 MHz Second Report & Order*].

<sup>3</sup> *In the Matter of Service Rules for the 698-746, 747-762 and 777-792 Bands et al.*, Request to Further Safeguard Public Safety Service, WT Docket No. 06-150 et al. (Sept. 20, 2007) [hereinafter Request to

officials and proposes a pricing approach that will provide public safety entities with access to a state-of-the-art-interoperable network designed by public safety officials for the use of public safety entities at a price that very likely will be lower than any other pricing structure. A not-for-profit framework for the DBL's services to all public safety agencies is consistent with the framework that was mandated by the Commission for the PBSL and would thereby provide symmetrical regulatory treatment.<sup>4</sup> This framework will not only benefit public safety entities and the public interest but will also provide transparency, accountability, and integrity which will help to achieve the overall objectives for this public-private partnership.

The goal and result of this proposal are that in the chain of service delivery to the public safety community not only would the PSBL be non-profit, but the earlier link in the delivery chain -- the entity providing the network service to public safety entities -- would also be subject to a no-profit limitation. The Commission is well equipped to play the oversight role that Frontline has proposed for it because it has extensive experience with cost accounting issues, including incremental pricing, and the Commission also has significant experience with not-for-profit organizations. The FCC has been involved in cost accounting issues since the inception of telecommunications regulation. The FCC required the Universal Service Administrative Company (USAC), the company that administers the USF, to be incorporated as a not-for-profit corporation.<sup>5</sup> In addition, the

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Further Safeguard Public Safety Service].

<sup>4</sup> See *700 MHz Second Report & Order* ¶¶ 344, 373, 375.

<sup>5</sup> *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc. et al.*, Report and Order and Second Order on Reconsideration, CC Docket Nos. 97-21, 96-45, 12 FCC Rcd. 22493, ¶¶ 1-2, 25-26, 30 (rel. July 18, 1997).

FCC required that USAC appropriately account for the costs associated with each mechanism separately, including the allocation of common costs.<sup>6</sup>

Frontline proposed a pricing structure that would charge fees to public safety entities based on the incremental costs associated with building, operating, and maintaining the shared network to the public safety entities' specifications, including coverage specifications.<sup>7</sup> This pricing structure allows public safety agencies to weigh the benefits versus the costs of special network features and also takes away any disincentives for the DBL to accommodate special features desired by the public safety community, thus incorporating discipline and reducing friction in the process. In addition, the pricing structure insulates the commercial operations from commercially uneconomic costs. This balanced approach to pricing will ensure a state-of-the-art public safety network and will facilitate the viability of the commercial network as well.

This is a fair, reasonable, and reliable framework for ensuring that the public safety community receives the full benefits of the public safety-private partnership as envisioned by the Commission, a framework that protects the economic viability of the shared network in which both commercial and public safety users have a vital stake and a framework that protects the overall public interest.<sup>8</sup>

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<sup>6</sup> *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc., et al.*, Third Report and Order in CC Docket No. 97-21, Fourth Order on Reconsideration in CC Docket No. 97-21, and Eighth Order on Reconsideration in CC Docket No. 96-45, CC Docket No. 97-21 et al., 13 FCC Rcd. 25058, ¶¶ 12, 30–34, 39–40, 50–61 (rel. Nov. 20, 1998); *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc. et al.*, Report and Order and Second Order on Reconsideration, CC Docket Nos. 97-21, 96-45, 12 FCC Rcd. 22493, ¶ 47 (rel. July 18, 1997).

<sup>7</sup> Request to Further Safeguard Public Safety Service, at 3.

<sup>8</sup> See *700 MHz Second Report & Order* ¶¶ 414–16, 424.

## **Analysis of the “No Profit, No Loss” Framework Proposed by Frontline**

A “no profit, no loss” framework provides benefits to the public safety entities, the commercial DBL and its users, and the public at large. The framework proposes a pricing structure that immediately places public safety entities in a better position than they are today, since costs associated with the commercial network will not be passed on to public safety users and public safety entities will pay *only* for the additional requirements that they themselves impose. The public safety entities benefit through the ability to access a fully functional and integrated network that has the features they need while paying for only the cost of building, operating, and maintaining those special features. The commercial entity (the DBL) and its users (critical infrastructure providers, smaller cellular carriers, new classes of innovative users and device manufacturers) benefit because this framework limits the risks associated with the build out, operation and maintenance of the public safety characteristics of the shared network. The public receives benefits from a nationwide public safety network that is operated on a no-profit basis and the availability of a new wireless services network provided by the DBL in coordination with the PSBL.

### *The Public Safety Entities Pay Only for the Incremental Cost of the Network Service*

Frontline proposes a framework that creates the lowest possible charges for public safety networks to access the network since the core charges for public safety services will not include any baseline commercial network costs. From that lower starting point, only incremental public safety requirements wholly outside of the requirements of the commercial business will be charged to public safety users.

Specifically, this proposed pricing structure would charge public safety entities the incremental costs associated with building, operating, and maintaining the shared network to public safety specifications and would compensate public safety for the secondary use by commercial customers of the capacity provided to the shared network by the PSBL.<sup>9</sup> Under this pricing structure, public safety entities' user fees would reflect the additional costs for requested public safety features and operations. This principle would encourage public safety entities to make only reasonable requests for special features because of their desire for low fees. This principle would also ensure that the DBL will not put the viability of the shared network at risk by accommodating special features requested by the public safety community. The fee structure would *not* include a profit margin, would only include the incremental costs associated with the costs of building, operating, and maintaining the shared network to public safety standards and would adjust the fees charged to public safety agencies in consideration of the value of the secondary commercial use of the PSBL spectrum. In addition, under the Frontline proposal, the DBL would not require the PSBL to pay any upfront fees, which is an added benefit.

With this pricing structure, more public entities will be able to afford to opt onto the nationwide safety network. The more entities that share the network, the lower the per-unit cost will be for all users, thereby providing incentives for more public safety entities to use the network consistent with the Commission's goals.<sup>10</sup>

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<sup>9</sup> Request to Further Safeguard Public Safety Service, at 3.

<sup>10</sup> See 700 MHz Second Report & Order ¶ 450.

*The Regulatory Treatment for the PSBL and the DBL Would Be Consistent*

A not-for-profit framework for the services provided to the public safety community by the shared network is consistent with the framework that was mandated by the Commission for the PSBL and would thereby provide symmetrical regulatory treatment.<sup>11</sup> The public would not receive the full benefit of the partnership if the PSBL was required to be nonprofit but there was some profit-making entity between the public safety user and the shared network. As Frontline stated in its filing, “no service provider or its agent should be motivated to take a profit from firefighters, police, and other first responders.”<sup>12</sup>

*The Structure Facilitates the Financial Viability of the Shared Network*

The structure provides an opportunity for a viable commercial service that will support critical public safety communications without jeopardizing the shared network’s financial viability. Toward this end, it is important that the proposal also insulate the DBL from costs associated with the provision of special services to the public safety community. For example, the fees charged will be established based on some estimate of usage. Under the not-for-profit framework the DBL would not make or lose money as a result of errors in projecting the level of usage for this new venture. A not-for-profit regulatory regime ensures that public safety entities do not pay any more than the actual incremental costs for the network and the service and ensures that the DBL is not paying for the costs of the public safety characteristics of the shared network or assuming the risks of incorrect estimates of these costs. This structure, which requires public safety entities to pay *only* for the actual costs of receiving special public safety coverage,

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<sup>11</sup> See *id.* ¶¶ 344, 373, 375.

<sup>12</sup> Request to Further Safeguard Public Safety Service, at 2.

features and services, accomplishes two important goals for the public safety-private network: keeping prices as low as possible for public safety entities while at the same time lowering the risk for the DBL, thereby lowering capital costs, which benefit not only the DBL but also the public safety entities who have a stake in the health of the shared network.

*The Structure Is Consistent with the Structure the FCC Established for USAC*

The Commission has highly relevant experience in overseeing such matters. In carrying out its public service obligations to implement the Universal Service provisions of the Telecommunications Act of 1996 the Commission directed that the Universal Service Administrative Company be established as a not-for-profit corporation.<sup>13</sup> The FCC requires USAC to project its expenses, the program support payments, and the contribution base on a quarterly basis and file that information with the Commission.<sup>14</sup> To the extent that USAC over collects in a given quarter because it over estimates administrative expenses or support payments or because it under estimates the contribution base, USAC is required to take those over collections into account and reduce the contributions in the subsequent quarter.<sup>15</sup> Similarly to the extent that USAC under collects because it under estimates administrative expenses or support payments or because it over estimates the contribution base, USAC is required to take those under collections into account and increase the contributions in the subsequent quarter.<sup>16</sup>

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<sup>13</sup> *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc. et al.*, Report and Order and Second Order on Reconsideration, CC Docket Nos. 97-21, 96-45, 12 FCC Rcd. 22493, ¶¶ 1–2, 25–26, 30 (rel. July 18, 1997).

<sup>14</sup> *Id.* ¶¶ 45, 46.

<sup>15</sup> *Id.* ¶ 50.

<sup>16</sup> *Id.*

Through this quarterly true-up process USAC adjusts its administrative expenses so as to not make a profit or lose money.

Generally the support mechanisms and contribution base work in a similar way, although a few components of support are based on historical costs. For example, telecommunications carriers project revenues on a quarterly basis, and USAC uses those projections in the calculation of the quarterly contribution base.<sup>17</sup> In April of the subsequent year companies report actual revenues, and USAC adjusts the contribution base calculation accordingly and also reduces the future individual payments required for those companies that over estimated revenues or increases the individual payments required for those companies that under estimated revenues.<sup>18</sup> Through this quarterly and annual true-up process, carriers receive only those support payments that are appropriate based on actual or model costs, and carriers only pay the contribution that is required under the law. The FCC also uses a no profit, no loss methodology for the contributions and administrative expenses related to the Telecommunications Relay Service (TRS) Fund.<sup>19</sup> This model has been in place since the inception of USAC and prior to that for the TRS Fund. The Commission as a result has extensive experience with this model.

The methodology proposed by Frontline is consistent with the approach that the FCC has used for the USF and TRS, and this methodology ensures that all of the benefits of the public safety-private partnership will be realized.

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<sup>17</sup> *In the Matter of Federal-State Joint Board on Universal Service et al.*, Report and Order and Second Further Notice of Proposed Rulemaking, CC Docket No. 96-45 et al., 17 FCC Rcd. 24952, ¶¶ 33, 36-37 (rel. Dec. 13, 2002).

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

*The FCC Has Extensive Experience with Cost Accounting and Cost Allocations*

The FCC also has had experience with cost accounting and cost allocations since the inception of telecommunications regulation. Rate of return companies have specific accounting requirements and continue to have their rates established and monitored using these methods today. The FCC considered incremental pricing as early as 1969<sup>20</sup> and more fully developed that methodology in its implementation of the Telecommunications Act of 1996.<sup>21</sup> As mentioned above, the FCC also required USAC to appropriately account for costs associated with each support mechanism and to allocate common costs and billing and collections costs to each support mechanism on a reasonable basis.<sup>22</sup> For example, direct administrative costs are budgeted and allocated directly to each support mechanism, and common costs such as legal and regulatory costs are budgeted on a corporate-wide basis. A portion is allocated to each support mechanism.

Similarly, the FCC should require cost accounting and pricing safeguards for the provision of public safety services over the shared network, with close FCC oversight to ensure that only appropriate costs are allocated to and reflected in the fees charged to public safety entities. These requirements are critical to the transparency and integrity of the system. If the DBL has other lines of business or is already in the wireless business

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<sup>20</sup> See *In the Matter of American Telephone & Telegraph Co. and the Associated Bell System Cos. Charges for Interstate and Foreign Communication Service*, Memorandum Opinion and Order, Docket No. 16258 et al., 18 F.C.C.2d 761, ¶¶ 7–9 (July 29, 1969).

<sup>21</sup> See e.g., *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, CC Docket Nos. 96-98, 95-185, 11 FCC Rcd. 15499, ¶¶ 618–836 (rel. Aug. 8, 1996).

<sup>22</sup> *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc. et al.*, Third Report and Order in CC Docket No. 97-21, Fourth Order on Reconsideration in CC Docket No. 97-21, and Eighth Order on Reconsideration in CC Docket No. 96-45, CC Docket Nos. 97-21, 96-45, 13 FCC Rcd. 25058, ¶¶ 12, 30–34, 39–40, 50–61 (rel. Nov. 20, 1998); *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc. et al.*, Report and Order and Second Order on Reconsideration, CC Docket Nos. 97-21, 96-45, 12 FCC Rcd. 22493, ¶ 47 (rel. July 18, 1997).

these safeguards are even more critical to ensure that only those additional costs associated with the public safety features of the network and its operations are included in the pricing. An entity that has other lines of business and other cellular businesses has the incentive to allocate costs away from its other businesses to the public-private network, thereby making its other businesses more profitable and making the service for public safety entities more expensive.

These cost accounting methods are recognized and accepted in the telecommunications industry. The public benefits associated with the public-private network require that cost accounting and pricing safeguards are in place to ensure that the benefits of the partnership inure to the benefit of the public while sustaining the financial viability of the shared network.

*The Structure Will Provide Transparency and Integrity and Will Hold the D Block Licensee Accountable to the FCC and the PSBL*

Frontline has proposed a simple and effective process for ensuring that the benefits of the shared network accrue to both the PSBL and the consumers of the DBL network services. To achieve this result, the FCC has determined that the DBL shared network will be operated under FCC oversight, so that the interests of the public safety community will be fully protected.<sup>23</sup> With reporting requirements, cost accounting and pricing safeguards, and FCC oversight, the system will be transparent and have integrity. In addition, it is entirely appropriate that the FCC would audit the cost allocations that are included in the fees charged to public safety agencies and give the PSBL the right to

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<sup>23</sup> See 700 MHz Second Report & Order ¶¶ 376–77.

receive audit report information and to ask questions in connection with the FCC audit to ensure effective accountability and transparency.

## **Conclusion**

The proposed not-for-profit framework will provide significant benefits to the PSBL and will ensure that a state-of-the-art public safety network will be constructed nationwide. This pricing structure allows the public safety experts to determine what additional features are necessary to serve the needs of the public safety community, and it squarely places the decision for weighing the benefits versus the costs of additional network features in the hands of the public safety experts. The pricing structure also insulates the commercial network from commercially uneconomic costs. This balanced approach to pricing provides the opportunity for the public safety-private partnership to succeed. A viable commercial network and a state-of-the-art public safety network are in the public interest.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 15, 2007

A handwritten signature in cursive script, appearing to read "Cheryl L. Parrino".

Cheryl L. Parrino

## **Official Biography**

**Cheryl L. Parrino**  
**Parrino Strategic Consulting Group**  
17 Chautauqua Trail  
Madison, WI 53719  
Phone: (608) 829-3470  
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### **Education**

B.B.A. – University of Wisconsin-Madison, 1976. Major: Accounting.

### **Professional Positions**

President, Parrino Strategic Consulting Group, 2/04 – Present

PSCG is a private consulting firm specializing in telecommunications and energy issues, compliance policies and procedures, audit planning and review.

Chief Executive Officer - Universal Service Administrative Company, 6/98 – 1/04

USAC is an independent, non-profit subsidiary created by the Federal Communication Commission in 1997 to administer, temporarily, the universal service support mechanisms for high cost areas and low-income consumers, and the billing, collection, and disbursement functions for the universal service programs for schools, libraries, and rural health care providers.

As CEO, I have responsibility for overall management and financing. As the first CEO of this company, I am responsible for setting up the corporation.

Chairman – Wisconsin Public Service Commission, 1/92 – 5/98

Commissioner – Wisconsin Public Service Commission, 2/91 – 5/98 and 2/89 – 6/89

Appointed Chairman by the Governor and confirmed unanimously in 1989, 1991, and 1997. As a commissioner, I was responsible for ensuring that all citizens of the state were provided with reliable and safe utility service at reasonable rates. As the chairman, I had the responsibility for all administrative matters including personnel and budget.

Executive Assistant to Chairman Charles H. Thompson – Wisconsin Public Service Commission, 5/87 – 2/89 and 7/89 – 2/91

Executive Assistant to Chairperson Mary Lou Munts – Wisconsin Public Service Commission, 5/86 – 5/87

As Executive Assistant, I was responsible for managing the agency on behalf of the Chairman and for providing technical assistance on policy issues. In 1990, I

developed a major reorganization plan for the agency and developed a strategic planning process. The reorganization was completed and a strategic plan was developed. Strategic and organizational planning continues to date.

Director – Bureau of Utility Audits – Wisconsin Public Service Commission, 9/82 – 5/86

As Bureau Director, I was responsible for supervising three energy audit teams, a special fuel audit team, and a holding company audit team.

Auditor 5 – Wisconsin Public Service Commission, 6/82 – 9/82

Auditor 4 – Wisconsin Public Service Commission, 11/81 – 6/82

As an Auditor 4 and 5, I was the lead auditor in charge of the audits of all 100 telephone utilities in Wisconsin along with their affiliated interests.

### **Current Activities**

Member of New Mexico State University, Center for Public Utilities, Board of Directors

Member of TEMPO

Member of the University of Wisconsin-Madison, School of Business, Dean's Advisory Board

Member of the Board of Directors of the Wisconsin Public Utility Institute (WPUI)

Director and Officer of Greenbush Heritage Foundation

### **Past Activities**

President of the National Association of Regulatory Utility Commissioners (NARUC)

Member of SAFO, the top management committee of NARUC

Member of NARUC's Executive Committee

Member of NARUC's Committee on Communications

Member of NARUC's Committee on Communications Ad Hoc Legislative Team

President of the Great Lakes Conference of Public Utilities Commissioners

Member of Bellcore Advisory Council

Member of the Federal/State Joint Board on Separations

Chairman of the Board of Directors of the Wisconsin Public Utility Institute (WPUI)

Member of the Ameritech Regional Regulatory Committee (ARRC)

Member of the Governor's Blue Ribbon Panel on Telecommunications Infrastructure

Member of the Governor's Task Force on Clean Air

Member of the Governor's Alternate Fuels Task Force