

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

In the Matter of)
)
Structure and Practices of the Video Relay) CG Docket No. 10-51
Service Program)

**COMMENTS OF
ASL HOLDINGS, INC.**

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SUMMARY

ASL Holdings, LLC (“ASL”) generally concurs with the proposed amendments to the Commission’s Section 64.606 certification regulations. Yet ASL urges the Commission to ensure that the proposed video relay service “core components” requirement obligations clearly enable providers to enter into Platform leasing arrangements as an alternative to ownership. ASL further urges the Commission to adopt explicit criteria for on-site evaluations and the reporting of substantive changes to company operations.

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ASL Holdings, LLC (“ASL”), a prospective federal Telecommunications Relay Service (“TRS”) Fund (“Fund”) eligible certificated provider and current the largest Internet-Protocol (“IP”)-based Spanish language video relay service (“VRS”) provider in the U.S., pursuant to the Commission’s April 6, 2011 *Report & Order and Further Notice of Proposed Rulemaking* in the above-captioned matter,¹ offers the following comments in response to the Commission’s proposed modifications to the current certification process for all Internet-based relay providers, including VRS providers.

ASL congratulates the Commission for proposing a comprehensive set of explicit certification requirements that provide clear guidance for prospective providers, while ensuring that only those prospective providers that are capable of meeting the Commission’s high standards for Fund eligibility certification will ultimately be authorized to serve the public and draw from the Fund. Though ASL generally concurs with the proposed amendments to the Commission’s Section 64.606 certification regulations,² ASL urges the Commission to ensure that the proposed VRS “core components” requirement obligations³ clearly enable providers to enter into Platform leasing arrangements as an alternative to ownership. ASL further urges the Commission to adopt explicit criteria for on-site evaluations and the reporting of substantive changes to company operations as proposed herein.

¹ *In the Matter of Structure and Practices of the Video Relay Services, Report and Order and Further Notice of Proposed Rulemaking*, CG Docket No. 10-51, 26 FCC Rcd. 5545 (rel. April 6, 2011) [“FNPRM”].

² 47 C.F.R. §64.606.

³ FNPRM at para. 58; “call center functions including call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS Fund...”, [hereinafter “VRS Platform”].

I. Introduction.

ASL is a privately-held woman and minority-owned Florida limited liability company with significant experience providing IP-based VRS services. ASL employs tri-lingual (English, Spanish and American Sign Language) interpreters with strong ties to the Deaf and Hard-of-Hearing community. A majority of ASL's VRS is provided to underserved Spanish language VRS users, whose options for professional, native Spanish language VRS such as those uniquely provided by ASL are exceptionally limited. ASL also serves a host of English speaking VRS users directly and under contract with other Fund eligible VRS providers.

ASL is pending certification as a Fund-eligible provider. ASL has demonstrated to the Commission that it has a plan for compliance,⁴ and effectively has complied, with the Commission's amended mandatory minimum standards for the provision of VRS and proposed certification rules in anticipation of submitting its supplemental application for Fund eligibility certification upon promulgation of the Commission's amended certification rules. ASL views the Commission's proposed certification rule amendments with particular interest as these rules have a critical impact on the way ASL and others will provide valuable VRS services to the public, to the Deaf and Hard of Hearing Community, and to the Spanish language Deaf and Hard of Hearing Community, in particular.

ASL views the Commission desire to establish clear certification procedures to preclude fraud as commendable and necessary.⁵ The broad certification requirements that have existed under Section 64.606, while arguably appropriate in years past, have in recent times sadly been proven ineffective in precluding disreputable individuals and providers from engaging in the very fraud and abuse that the new

⁴ See *e.g.* In the Matter of Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51, *ASL Holdings, LLC Petition for Waiver* (May 23, 2011).

⁵ FNPRM para. 95, "To the extent that we have procedures in place to effectively verify the qualifications of an entity prior to allowing that entity to become certified as an eligible provider, we will be better able to limit fraud and minimize our oversight burden once such entities are providing service."

certification rules are designed to end. Proposed Commission requirements that prospective Fund eligible certificated providers assume responsibility for the entirety of their operations including “core components” stand to accomplish this goal.

Yet as is the case in all forms of regulation, a fine balance must be drawn between the meeting public interest objectives while mitigating the potential for overly burdensome regulation that with limited countervailing public benefit. ASL generally supports the proposed certification, though proposes additional clarity regarding how Fund eligible certificated providers may deploy their VRS Platforms, additional guidelines for Commission on-site visits, and additional requirements for substantive change of operations reporting. Adoption of these recommendations is consistent with the Commission’s efforts to instill specificity and clarity in its proposed certification regulations, to maintain the integrity of the Fund, and preclude fraud and abuse.

II. Federal Certification Is Appropriate and Necessary to Effectively Maintain Federal Fund Integrity.

The Commission proposes “that all Internet-based relay providers be required to receive certification from the Commission, under the procedures and guidelines proposed herein, to be eligible to receive compensation from the TRS Fund.”⁶ ASL readily agrees. The Commission and Fund administrator clearly maintain ultimate responsibility to oversee the entirety of the *federal* Fund and should appropriately serve as the singular regulatory entity to establish the minimum standards for the provision of IP-enabled relay services and determine new and existing provider compliance with those standards as a prerequisite for fund eligibility.

Though state entities properly assume responsibility for the management of state relay service funds, only the Commission can adequately establish uniform standards for the provision of relay services that transcend state jurisdictional boundaries, and verify provider compliance with those standards. The Commission is uniquely positioned to have a comprehensive view of the entirety of the issues surrounding the provision of federally compensated relay services where the state view is necessarily

⁶ *FNPRM* para. 96. 47 C.F.R. §64.604(c)(5)(iii)(F)(2), as proposed.

limited, the specific regulatory expertise and authority to establish standards and enforce their compliance, and ultimate responsibility for Fund integrity.

As the Commission itself notes, state oversight has, “hampered the Commission’s efforts to exercise stringent Commission oversight over entities providing service.” Despite the best state efforts, only the Commission can – and now should – determine which providers should be deemed eligible for federal Fund eligibility certification. ASL supports the Commission’s assumption of responsibility as the sole entity for certifying new providers and recertifying existing providers.

III. Licensing Should be Explicitly Deemed an Acceptable Alternative to VRS Platform Ownership.

Proposed Section 64.606(a)(2)(ii)(D) will impose an obligation on those providers seeking certification as a Fund eligible provider to provide:

proof of purchase or license agreement for use of all equipment and/or technologies, including hardware and software, used by the applicant for its call center functions, including but not limited to, automatic call distribution, routing, call setup, mapping, call features, billing for compensation from the TRS fund, and registration;

This requirement, coupled with the newly adopted prohibition against Fund eligible certificated providers engaging in any way with Fund ineligible providers under Section 64.604(c)(5)(iii)(N)(1)(iii)⁷ accords IP-enabled VRS providers with two limited options for deployment of core components meeting the Commission’s high standards for the provision of VRS: 1) ownership; or 2) a licensing agreement with a Fund eligible certificated providers. ASL recognizes the underlying basis in establishing these limited options as a process for the Commission to fully vet VRS platforms in an effort to preclude fraud and abuse. Yet the manner in which specific term and “licensing” could be interpreted could have a detrimental impact on new providers if it is the Commission’s intent to interpret “licensing” if interpreted as somehow conveying ownership.

⁷ 47 C.F. R. §64.604(c)(5)(iii)(N)(1)(iii), “An eligible VRS provider may not contract with or otherwise authorize *any* third party to provide interpretation services or call center functions (including call distribution, call routing, call setup, mapping, call features, billing, and registration) on its behalf, unless that authorized third party also is an eligible provider. [emphasis supplied].”

The term “licensing” as a legal term does not by itself carry ownership rights.⁸ A plain language interpretation of the term “licensing” as used in the proposed certification rule amendments therefore suggests that a provider who licenses a VRS platform from a Fund eligible provider indeed need not own the platform or be required to buy it. Under this interpretation, “license” as used in Section 64.606, would be synonymous with the term “lease,”⁹ *e.g.* the right of use or possession for a specific period of time that does not ultimately require ownership. To the extent that this is the interpretation being taken by the Commission, ASL has no objection, though believes an interpretive clarification should be included in the final order promulgating the rules. Yet if core component *ownership* is somehow implied by the word “licensing” under the proposed rule, ASL strongly urges the Commission to adopt a licensing requirement that does not dictate ownership.

An implication that all providers should own their own equipment would virtually guarantee that no new providers could be certified unless they outright purchased equipment. Equipment is costly. Based on price bids obtained by ASL, the acquisition cost of an entire platform could well exceed \$2M. This cost reflects development costs as well as direct equipment costs, but excludes additional training and maintenance expenses. For an emerging entity, such costs could simply prove beyond the realm of possibilities. This is not to say that equipment acquisition should never be desirable for established providers. Yet providers should have the flexibility to determine if or when to acquire their VRS platforms.

Outright ownership of sophisticated core VRS components is prohibitively expensive for all but exceptionally well capitalized larger firms, or those with ready access to capital, and is entirely unnecessary to accomplish the Commission’s goals of precluding fund and abuse.¹⁰ Platform acquisition

⁸ *See e.g.* FindLaw.com; Wikipedia.com.

⁹ “**Lease**” means a transfer of the right to possession and use of goods for a term in return for consideration...” Uniform Commercial Code §2A-103.

¹⁰ In any event, ASL is unaware of any “turn key” VRS Platform that could simply be acquired ‘off the shelf.’ Existing VRS platforms are comprised of hardware and software components developed by entities other than the VRS provider which have been integrated by the provider. Few current Fund eligible providers, if any, have themselves engineered and built their own platforms.

demands not only equipment purchases and software applications,¹¹ but also demands a trained support staff to maintain and repair the equipment. Platform support requirements alone would significantly delay the provision of service as a prospective provider hired and trained support staff and deployed the equipment, all further adding to the cost of ownership. And platform ownership for an emerging entity multiplies the risk factor, which itself may be a barrier to providing the service. Platform ownership by necessity diffuses a provider's focus away from serving the public to serving the platform. The provider would have to develop a level of technical expertise that would divert precious resources away from its core relay service competency and operations.

Equipment ownership is not a prerequisite for the conduct of any commercial enterprise. Leasing is a standard commercial practice that should not be precluded in the provision of relay services. That the Commission separately allows providers to "license" core components suggests that there is an implicit acknowledgement that core components do not necessarily have to be acquired by the provider to meet the MMS. Yet in light of the possibility for an alternative, highly restrictive interpretation, ASL urges the Commission to explicitly establish in the rules or in the accompanying order promulgating those rules, that providers may indeed lease, rather than own, core components from Fund eligible certificated providers.

The licensing issue raises another critical matter that should be considered by the Commission: whether Fund eligible providers should at some point be able to purchase or lease equipment from non-Fund eligible software and equipment vendors that have been "vetted" by the Commission. Under the current prohibitions established in Section 64.604(c)(5)(iii)(N)(I)(iii), the only options for providers are to purchase equipment or, to lease it, as noted. If leasing, presuming the interpretation addressed *supra* is correct, after October 1, 2011¹² Fund certificated providers may only lease from other Fund certificated providers. This necessarily imposes a severe limitation on what VRS platforms may be available for

¹¹ Software applications would either have to be developed in house or licensed from a third party, who would retain ownership of the application.

¹² *In the Matter of Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, *Order Suspending Effective Date*, FCC 11-86 (May 31, 2011).

leasing, and moreover places the provider at the mercy of a competitor who will be under no obligation – nor have any compelling reason to – lease its platform.

Though perhaps by Commission design, such an approach has the potential for limiting services, antiquating existing platforms, and moreover undermining technical and service innovations that the Commission’s MMS support¹³ and competitive platform providers could offer, unless an opportunity for platform developers and vendors to provide core components to providers is authorized. ASL urges the Commission to initiate an investigation into a process that would enable equipment and software vendor to be vetted by the Commission without the need of such providers to become Fund eligible certificated providers. Such an approach would be roughly analogous to, but by no means as involved as, the Commission’s Part 15 radio frequency device certification regulations. In so doing, the Commission would be able to pursue its relay service technology goals, while ensuring that providers who are not yet ready to purchase equipment are neither limited to, nor potentially held hostage by, Fund-certified competitors’ core components.

IV. Voluntary Planned Service Interruptions Should Be Deemed Authorized If All Prerequisites for Such Interruptions Are Met.

ASL supports promulgation of rules which explicitly establish provider responsibilities associated with planned service discontinuance.¹⁴ Such rules are entirely consistent with Commission rules governing telecommunications service discontinuance, and are appropriate to mitigate the impact of service discontinuances to the Public. Yet if these proposed rules are indeed to apply to service interruptions, temporary interruptions which may be required in limited instances for system testing, equipment maintenance, or repair as is contemplated, as well as to permanent service discontinuances¹⁵

ASL proposes that: 1) the Commission explicitly draw a distinction between service discontinuance and

¹³ 47 C.F.R. §64.604(b)(5), “No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities.”

¹⁴ *FNPRM* Footnote 275 makes reference to the service discontinuance requirements associated with Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214, and, by extension, to 47 C.F.R. §§63.19 and 63.71 governing international and domestic service discontinuance, respectively. This reference raises the issue of whether the proposed service interruption regulations are to indeed apply to service discontinuance, and/or to temporary service interruptions that do not entail the actual discontinuance of service. This is a critical distinction that should be incorporated into the proposed rules.

¹⁵ *FNPRM* para. 101.

planned temporary service interruptions in the rule; and 2) to the extent that the same approach is to be taken for both service discontinuances and interruptions, that for purposes of planned service temporary interruptions, provider requests for temporary service interruption be deemed approved by operation of law within 30 days, so long as the provider's notice to the Commission meets the entirety of the specified requirements and detail for temporary interruption.¹⁶

As opposed to permanent service discontinuances, service interruptions are inherently temporary. Planned interruptions may be periodically necessary for system maintenance, testing, and repair. Yet service interruptions are disruptive to company operations and are implemented only if there is a compelling need to completely cease operations for a period of time. No provider willingly seeks to disrupt its services and inconvenience its subscribers unless there is a compelling reason to do so. This underlying necessity to adversely impact short term operations in return for required efficient long-term system operations should be acknowledged by the Commission through an *automatic* approval process. The Commission should reject applications exclusively on an exception basis, and only if the provider has not fully met the Commission's proposed detailed information requirements, and has not subsequently addressed Commission concerns on a timely basis.¹⁷

Permanent service discontinuance should appropriately be subject to Commission approval consistent with current Commission telecommunications regulatory practices for the provision of domestic services. Temporary service interruptions do not have the same impact on subscribers, and should be subject to notice and automatic approval unless the Commission maintains that the provider has not through the information and notice provided to the Commission, fully considered the entirety of the impact of the disruption on the Public. The proposed rules already allow for this approach to the extent

¹⁶ *Id.* "detailed information of (1) its justification for such service interruption; (2) its plan to notify customers about the impending interruption; and (3) its plans for resuming service, so as to minimize the impact of such interruption on consumers through a smooth transition of temporary service to another provider, and restoration of its service at the completion of such interruption."

¹⁷ The proposed rules do not address corrective action that may be taken by the requesting provider. In instances where a provider has not adequately met the Commission's requirements for planned temporary suspension requests, providers should be accorded an opportunity to take corrective action in the event that the Commission is not satisfied with the provider's plan, before an outright rejection of the provider's request is made.

that the Commission further draws the distinction between permanent service discontinuance and planned temporary service interruptions, and deems the latter to be automatically approved subject to disapproval only on an exception basis.

V. Providers Should Explicitly be Accorded Flexibility In Providing Notice of Unplanned Service Interruptions Beyond Their Control if Mitigating Circumstances can be Demonstrated.

The Commission proposes “that the affected provider submit a written notification to CGB within two business days of when the service disruption (due to circumstances beyond a provider’s control) first occurred, with an explanation of how the provision of its service had been restored or will be restored imminently.”¹⁸ ASL agrees. Yet as the recent natural disasters in the Midwest and Southern U.S. have underscored, there may be catastrophic events that could preclude providers whose operations were disrupted as a result of such natural disasters and the resulting disruption of all communications or Internet services, from advising the Commission of the disruption within two days.

In such instances, providers that cannot inform the Commission of service disruptions resulting from circumstances beyond the provider’s control within two days of the occurrence should not be penalized for failure to timely inform the Commission if able to demonstrate that the provider had no reasonable available means to communicate with the Commission within the two day period. Though such a condition may be exceptionally unlikely, the proposed rules, or order promulgating the rules, should explicitly acknowledge this potential and absolve providers that do not meet the two day notice period for extenuating circumstances from penalties if such circumstances are fully documented to the Commission.

VI. Clear Guidelines for Commission On-Site Visits Are Necessary to Ensure Providers to be Fully Prepared and Compliant.

The Commission proposes discretionary on-site visits to the premises of those entities seeking Fund eligibility certification.¹⁹ ASL readily agrees that discretionary on-site visits, is entirely appropriate.

¹⁸ *FNPRM* at para 102.

¹⁹ *Id.* at para 98. “We believe that these requirements will enable the Commission to determine applicants’

ASL proposes that consistent with its intent to conduct on-site visits, that the Commission adopt specific visit guidelines for prospective providers.

Though Commission on-site visits are conceptually understood to be used to verify representations made by prospective providers regarding MMS compliance, ASL believes that additional inspection metrics should be explicitly established and verified by the Commission during its on site visits including, but not limited to:

- Actual space leased by the prospective provider;
- Compliance with security and privacy requirements;
- Availability of equipment at interpreting stations/cubicles;
- Back-up power system;
- Random test calls to verify procedures compliance;
- Availability of supervisory staff;
- Availability of operations and procedures manuals; and
- Random verification of interpreter employment;

Should there be any documented evidence that a prospective provider's representations have been intentionally falsified, the provider's application should be immediately denied. If the applicant seeks to reapply, it should assume the additional obligation of providing a detailed discussion of why the misrepresentation occurred and what steps were taken to correct the issue. Should issues of non-compliance arise in the absence of demonstrated intent to misrepresent an applicant's compliance, the applicant should be accorded a limited amount of time, perhaps 30 to 60 days, to correct the non-compliance and provide the Commission with evidence that the issue has been resolved. Failure to correct areas of non-compliance within a specified time should result in denial of the applicant's application, unless the provider can establish that the noncompliance was the result of circumstances beyond the provider's control. In such instances, the provider should be accorded a limited amount of time to pursue resolution and bring itself into compliance, subject to periodic updates to the Commission.

VII. Providers Seeking Compensation for Spanish Language Translation Should Demonstrate Their Procedures for Hiring Spanish Speaking Communications Assistants.

Though the Commission has not specifically requested comment regarding issues affecting

qualifications and enable the Commission and the Fund administrator to oversee the providers' operations and activities so as to ensure that they are in compliance with the new TRS rules adopted in the accompanying *Order*."

Spanish speaking relay service users, ASL maintains that the Commission should now address functional equivalency concerns for this segment of the Public. Here, ASL proposes that as there is currently no National Spanish/ASL test, that those VRS providers wishing to be compensated for Spanish language translation should be required to provide a detailed discussion regarding their procedures to screen Spanish language Communications Assistants (“CAs”). There have been numerous complaints from Spanish Deaf that services offered to Spanish are provided by interpreters who are simply unqualified to translate into Spanish. The very clear minimum obligations for proficiency that apply to CAs generally must apply to Spanish language CAs specifically. Fluency in spoken Spanish for example, does not equate to competency in interpreted Spanish sign language. This requires a high degree of specialized competency. The Commission should expect no less proficiency from Spanish language CAs under its MMS than from those who perform compensable American Sign Language translations. Though ASL does not propose specific minimum standards or any form of separate certification for Spanish language CAs, it does urge the Commission to require those entities that seek compensation from the Fund for Spanish language calls to require a demonstration of technical Spanish language competency.

Ultimately the Commission should, in conjunction with the industry, establish clear minimum Spanish translation guidelines. Engagement of unqualified or limited qualification Spanish CA’s Limited should not be acceptable under the functional equivalency standard for Spanish Deaf.

VIII. Providers Should Report All Substantive Changes in Operations to the Commission.

The Commission proposes that providers report updates to the Commission with annual reports, and requests comment.²⁰ ASL supports the Commission’s proposal. The Commission should be apprised of material changes in provider operations which could impact the provision of compensable relay services.²¹ To that end, ASL proposes that providers at a minimum report the following material changes to company operations in their annual reports and through *ad hoc* reports the Commission might consider:

²⁰ *FNPRM* para. 99.

²¹ ASL believes that reporting of substantive changes in company operations should not be confined to annual reports, but should be provided within 30 days of the date of any material change so long as the change will not otherwise engender the requirement for Commission approval.

- Change of executive management;
- Acquisition, lease, sale, or termination of leases to any singular call center;
- Sale or acquisition of a provider;²²
- Change of numbering partners;
- Material change of registration and service policies and procedures
- Change or addition of name brand name and discussion of the procedures for compliance with Commission rules; and
- Introduction of new services and/or applications.

The Commission should be fully apprised of material changes in operations that may affect provider operations no less than annually, and moreover, within a period of time following their occurrence.

IX. Conclusion.

ASL commends the Commission for its promulgation of explicit regulations governing Fund eligibility certifications. Such regulations now establish clear requirements for those providers who seek compensation from the Fund, ensure that providers have a clear understanding of the minimum standards they must meet, and preclude the potential for abuse and fraud to protect the integrity of the Fund. ASL's primary concern relates to the need for clarity concerning the ability of providers to lease, rather than acquire, core components to their services, while urging the Commission to adopt a vetting process for non-Fund eligible core component vendors to make equipment and applications available to providers. Though the ability of providers to lease or license the technologies appears to be an option accorded under the rules, the Company believes that this key point should be clarified within the rules or Commission order promulgating the rules. ASL further proposes specific on-site inspection considerations for Commission consideration geared toward further verifying representations made by prospective Fund certification applicants. A critical consideration that has not been addressed pertains to minimum qualifications for Spanish language CAs. ASL strongly urges the Commission to at a minimum require those entities who seek compensation for Spanish translation to identify the base qualifications of

²² Transfer of ownership transaction may prove highly sensitive in this segment of the industry. The Commission should review such transactions and the implications for Fund eligibility up to adoption of a formalized approval process.

its Spanish language CAs, and begin establishing a set of MMS and minimum requirements specifically for Spanish language CAs in the interest of functional equivalency. And ASL urges the Commission to require that all providers provide annual and *ad hoc* notification of all material changes in company operations that could impact service or the subscribers.

Respectfully submitted this 1st day of June, 2011,

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