

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

In the Matter of:)	
)	
Carriage Complaint Against)	
)	
Service Electric Cablevision, Inc. and)	Docket No. 13-____
Service Electric Cable Television, Inc.)	File No. CSR-____-M
by)	
)	
Western Pacific Broadcast, LLC)	
)	
With Respect to Carriage Within the)	
Philadelphia, PA Designated Market Area,)	
of Local Commercial Television Station WACP,)	
Licensed to Atlantic City, New Jersey)	

Directed to: The Chief, Media Bureau

**CLARIFICATION, SUPPLEMENT AND CORRECTION OF RECORD TO
DECEMBER 14, 2012
PETITION FOR SPECIAL RELIEF
BY ORDER OF CARRIAGE**

Western Pacific Broadcast, LLC (“Western Pacific”) hereby respectfully submits this clarification, supplement and correction of the record in the above-captioned matter.

The Petition for Special Relief (the “PSR”) filed by Western Pacific in this matter requests relief by order of carriage against several CUIDs and two PSIDs in the Philadelphia, PA DMA. It is clear from the PSR what cable systems and associated community units are the targets of the PSR. They are listed in Exhibit 1 to the PSR, and the PSR refers directly to Exhibit 1 for identification of the target cable systems and associated community units.¹

¹ PSR, at 2 n.1.

However, Western Pacific has labored under what it just recently discovered to be a mistake of fact as to the actual corporate entity which controls one of those systems and its associated community units. It was Western Pacific's belief that Service Electric Cablevision, Inc. ("SE Cablevision") controlled both systems (PSID 001704 and 001711) and their respective community units. In fact, we learned very recently, that SE Cablevision's "affiliate,"² Service Electric Cable Television, Inc. ("SE Cable TV") controls PSID 001711 and its associated community units. Western Pacific discovered that these affiliates were in fact separate legal entities only after serving the PSR on the person who we thought was acting as counsel for both systems, only to be told for the first time that the SE Cablevision and SE Cable TV are related yet separate legal entities.

This mistaken identification began with Western Pacific's June 6, 2012 must carry election letter, which was addressed to two headquarters office locations (which are just 5 miles apart in Allentown, PA), for what we believed to be SE Cablevision, and listed both cable systems and associated community units, but listed SE Cablevision as the entity operating from both offices, one on Hamilton Street and the other on Liberty Lane. What we did not realize was that the Hamilton Street office housed SE Cable TV. The letter was received by SE Cable TV at its Hamilton Street address, as demonstrated by the US Post Office return receipt notice executed by a SE Cable TV employee and appearing in Exhibit 4 of the PSR. As stated in the PSR, Western Pacific received no response to this letter from either SE Cablevision or SE Cable TV.³

² The websites for both SE Cablevision and SE Cable TV list the other as its "affiliate." Copies of web pages printed from these websites which express this affiliation are attached as **Exhibit 1** to this pleading.

³ PSR, at 2.

Because of the lack of a timely response, Western Pacific sent a September 14, 2012 must carry demand letter addressed to SE Cablevision at the same two addresses, which we now know to be an address for SE Cablevision and a second address for SE Cable TV. This letter lists both addresses, and contains the same PSID and CUID exhibit, showing both PSIDs and associated CUIDs, that was attached to the June 6, 2012 election letter.⁴

While this letter was addressed to SE Cable TV's office on Hamilton Street, but in the name of SE Cablevision, neither SE Cablevision nor SE Cable TV informed us of the mistaken identity. Even though not addressed to SE Cable TV, SE Cable TV responded to this demand letter through one of its officers and not by counsel. In his less than one-half page letter, this officer informed Western Pacific that it did not receive an adequate signal from WACP at the cable headend (although this brief letter provided no signal measurement information). Accordingly, SE Cable TV knew it was the proper party to respond with respect to one of the two PSID's listed in the exhibit to the demand letter. But, although it had to be clear to SE Cable TV that Western Pacific had SE Cable TV confused with its affiliate SE Cablevision, SE Cable TV's letter to Western Pacific did not point this out.⁵

⁴ A copy of this September 14, 2012 letter appears in Exhibit 3 of the PSR.

⁵ A copy of this letter appears in Exhibit 5 to the PSR. The letter was printed on stationery that had as its letterhead the name "Service Electric Cable TV & Communications" appearing with a strand of cable running through the name, but neither this letterhead nor the contents of the letter itself offered any indication that SE Cable TV was a company different than SE Cablevision that controlled one of the two systems, or that the name in the letterhead was anything more than a trade name or an operating company. Nowhere in that letter was the required entity designation (such as Inc. or LLC) used or disclosed.

Within two weeks of receiving SE Cable TV's letter, Western Pacific received a formal response from an attorney, whose letter states in its first sentence that he represents SE Cablevision "and its subsidiaries." This letter is described in the PSR and attached to it as Exhibit 6. While this counsel's letter was written expressly in response to and specifically addresses Western Pacific's carriage demand letter, counsel's letter did not inform Western Pacific that Western Pacific's carriage demand letter incorrectly attributed SE Cable TV's PSID and its CUIDs to SE Cablevision and did not tell Western Pacific that SE Cable TV existed as a separate legal entity. In fact, counsel's letter made no mention of SE Cable TV. Moreover, the reference line of counsel's letter refers to Western Pacific's demand for carriage "on Service Electric Cablevision, Inc. Counties of Berks, Bucks, Chester, Lehigh and Northampton, Pennsylvania." This is significant as that is the complete list of counties in Western Pacific's demand letter and of the 5 counties listed two of them, Lehigh and Northampton, are not served by SE Cablevision at all but are served only by SE Cable TV.⁶ Based upon this letter, Western Pacific was led to believe that the one headend listed in counsel's letter was the "principal headend" for both PSIDs, and Western Pacific proceeded to deal exclusively with this counsel to determine the issue of whether there is a "good quality signal" at the listed principal headend. Indeed, never has either SE Cable TV or SE Cablevision informed Western Pacific that SE Cable TV has a separate counsel or has employed an engineer.

After numerous interactions with this counsel for SE Cablevision (as recited in detail in the PSR), Western Pacific filed the PSR and served it on this counsel, as shown

⁶ See Exhibit 1 to the PSR.

in the certificate of service. To repeat, the PSR is addressed to SE Cablevision and listed both PSIDs and both of their associated CUIDs in its Exhibit 1. The PSR also includes as its Exhibit 5 the brief reply of SE Cable TV to Western Pacific's carriage demand letter. After receiving his service copy of the PSR, counsel for SE Cablevision sent counsel for Western Pacific an email which, for the first time, revealed that Western Pacific had been confused as to which of the Service Electric affiliates, SE Cablevision or SE Cable TV, controlled PSID 001711. A copy of that email is attached to this document as **Exhibit 2**. This counsel also informed us that, while he regularly represents SE Cable TV, he was not representing it in this matter. He also asked that we provide SE Cable TV's Vice President with a copy of the PSR,⁷ which we did as shown in the email attached as **Exhibit 4** to this document. Although we asked SE Cable TV's Vice President by that email and by voice message to contact us to discuss the PSR, and to hopefully resolve it without the need to have the Bureau consider the case and draft an order, SE Cable TV has not replied to us.

We ask that this clarification of the record be considered a part of the record in this PSR proceeding given the understandable confusion under which Western Pacific has labored and to which, perhaps inadvertently, SE Cablevision and SE Cable TV have at least passively contributed.⁸ SE Cable TV knows and has known full well that Western Pacific has demanded carriage on its system, as the carriage demand letter as well as the preceding election letter were addressed to SE Cable TV's offices, listed its PSID and CUIDs (along with those of SE Cablevision), and SE Cable TV replied to the

⁷ See **Exhibit 3** to this document.

⁸ We want to emphasize that we are not accusing counsel for SE Cablevision of intentionally misleading Western Pacific.

demand letter as though it were SE Cablevision. That there was not further communications directly between SE Cable TV and Western Pacific is the natural outgrowth of SE Cablevision's counsel's letter to us that (1) said he represented SE Cablevision "and its subsidiaries"; (2) referred to SE Cablevision systems in Lehigh and Northampton, Pennsylvania as covered by his letter even though the systems in those counties are controlled by SE Cable TV and not SE Cablevision; and (3) provided a single headend location, thus communicating to us that this single headend served as the principal headend for both PSIDs listed in the carriage demand letter, including the Lehigh and Northampton, Pennsylvania systems controlled by SE Cable TV. Thus, we reasonably concluded that SE Cable TV's brief and informal letter to Western Pacific misidentified the principal headend, which is easy for non-lawyers to do given that the concept is a legal concept and frequently the principal headend is not where a TV signal would be received. Accordingly, Western Pacific did not reply to SE Cable TV and dealt exclusively with SE Cablevision's counsel, thinking we were arranging carriage through him on both systems.

As reflected in the PSR, Western Pacific and SE Cablevision interacted frequently concerning this issue of carriage and not once was Western Pacific informed that counsel for SE Cablevision "and its subsidiaries" was not speaking for the one of the two PSIDs controlled by SE Cable TV. Indeed, counsel for Western Pacific thought that the parties were close to resolving the carriage issue, as stated in the PSR, and even reached out to the Bureau with the knowledge of SE Cablevision's counsel, to ask if the Bureau could

hold the PSR in abeyance while negotiations progressed toward what we expected to be a soon-to-come resolution.⁹

For these reasons, and considering the fact that the PSR has not appeared on public notice, Western Pacific respectfully requests that the Bureau recognize SE Cable TV as a party to the PSR and accept this clarification for the record.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

By: _____


M. Scott Johnson
Thomas J. Dougherty, Jr.
Its Counsel

FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

January 9, 2013

⁹ Copies of emails concerning this appear in **Exhibit 5** to this document.

EXHIBIT 1

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John Walson Sr.

Service Electric Cable TV, Inc. is a successor corporation to a community antenna television business started by John Walson in June 1948. Prior to beginning the nation's first community antenna television system, later known as cable television, in Mahanoy City, Pennsylvania, Mr. Walson was employed by the Pennsylvania Power & Light Company. In addition to that occupation, he and his wife also operated an electric appliance store under a General Electric franchise. In 1947, the Walsons began selling television sets at their appliance store. It was impossible to receive the three Philadelphia network stations in Mahanoy City because the town is surrounded by mountains. Because of this situation, an antenna tower was built on top of a nearby mountain. Mr. Walson was able to demonstrate his new television receivers at this mountain top location. In searching for ways to increase television sales, a line was constructed from that antenna site to his appliance warehouse.

In June 1948, that line was extended on utility poles to the Walsons' appliance store. Along the way, several families were connected to his community antenna system. Three television sets were displayed in the window of the store. Many people congregated in front of the store to view either channel 3, 6, or 10 from Philadelphia. As a result, a new industry was started in America.

Mr. Walson's pioneering achievements were recognized by the Congress of the United States and the National Cable Television Association in the spring of 1979. Quoting from the 96th Congressional record: By adding new antennas and boosters, and by starting to wire individual homes, Mr. Walson was able to create the Nation's first cable television system in 1948...

From this early beginning of cable television, Mr. Walson began constructing systems in nearby communities. Others, who observed his success, were quick to follow in areas where reception of television signals was difficult or impossible. His faith in the future of cable television never diminished. As systems were offered for sale, he purchased them. When franchises were available, he applied. Mr. Walson was guided by the one fundamental principle, people wanted television service. They were entitled to receive it, and his duty was to provide quality access to television.

With an alertness to change, adaptability to improving technology, and a conscientious responsibility to its customers, Service Electric continues to build its reputation in the cable television field. This requires the combined efforts of many dedicated people. This company is fortunate to have such people and we value them.

Phone

- Residential Services
- Add'l Features
- Help
- Web Portal

Internet

- Residential Services
- Business Services
- Broadband Video
- Help
- My PTD Webmail

Cable TV

- Lifeline
- Full Channel Lineup
- HD Services
- Video OnDemand
- Help
- Channel Lineups

Bundled Services

- Valu-PIC
- Cable & Phone

More

- What's New!
- History
- Employment
- Site Map

Merry Christmas and a Happy New Year

Play Our Holiday Commercial

SERVICE ELECTRIC



*In Loving Memory
John E. Watson
1948 - 2012*

CABLE TV & COMMUNICATIONS

The following are our affiliate offices:

- **Service Electric Cablevision**
http://www.secv.com
Birdsboro: 610-582-5317
Hazleton: 570-454-3841
Sunbury: 570-286-5951
Mahanoy City: 570-773-2585
- **Service Electric Cable Company**
http://www.secable.com
Sparta: 973-729-7653

[Click here to go back to our home page](#)



Note: This web site is best viewed in 1024x768 screen resolution or better



SERVICE ELECTRIC
Lehigh Valley

CABLE TV & COMMUNICATIONS

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As cable companies are venturing into new competitive services, Service Electric once again is leading the way by investing millions of dollars in interactive cable lines to provide the non-television services such as internet and telephone. Service Electric has formed partnerships with the following companies which enables us to offer Internet and telephone services.

Partners:

- **PenTeleData** (Internet provider since 1995)
<http://www.ptd.net>
- **Ironton Telephono** (telephone provider since 1998)
<http://www.ironton.com>

Our Affiliates:

- **Service Electric Cablevision**
<http://www.secv.com>
Birdsboro: 610-582-5317
Hazleton: 570-454-3841
Sunbury: 570-286-5951
Mahanoy City: 570-773-2585
- **Service Electric Cable Company**
<http://www.secable.com>
Sparta: 973-729-7653
- **Service Electric Telephone**
<http://www.setelephone.com>
610-865-9100
- **Service Electric TV2**
<http://www.tv2sports.com>
610-434-7833

Phone

- Residential Services
- Add'l Features
- Help
- Web Portal

Internet

- Residential Services
- Business Services
- Broadband Video
- Help
- My PTD Webmail

Cable TV

- Lifeline
- Full Channel Lineup
- HD Services
- Video OnDemand
- Help
- Channel Lineups

Bundled Services

- Valu-PIC
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All together now.

Enter Zip Code

OR

Choose Service Area



- Products
- Shop
- Business Services
- Customer Support
- View/Pay Bill
- About SECV
- Contact Us

Search SECV.com



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- My PTD Webmail
- Channel Lineup
- What's on TV?
- Ratecard
- SECV FAQs
- Live Web Chat

I don't know what I enjoy more, the RedZone on Sundays or the new MoTV channel you just added. It airs some of my all-time favorite shows. I recommend your cable service to everyone in Kutztown that is willing to listen to me. I wanted to make sure you received proper kudos for the great stuff.

Eric from Kutztown, PA

Join Us on Facebook

Enjoy 2 Months FREE from SECV!

JAN 27

Company History



Service Electric Cablevision, Inc., incorporated in early 1991, is one of several successor corporations to a community antenna television (now called cable television) business started by John and Margaret Watson in the spring of 1948.

Service Electric Company, the original name, was formed by Mr. and Mrs. Watson in the mid-1940s to sell, install, and repair General Electric appliances in the Mahanoy City area of Schuylkill County, Pennsylvania. In 1947, they began selling television sets; however, it was nearly impossible to receive the three Philadelphia network stations in Mahanoy City because the town is surrounded by mountains. Due to the geographical interference, Mr. Watson decided to erect a utility pole on top of a nearby mountain, placed an antenna on top of the pole, and thus demonstrated television. In an attempt to increase sales, he

connected the tower site to their appliance store by using wire/cable and modified signal boosters.

In June of 1948, he successfully connected a nearby tower site to the appliance store as well as to several homes along the cable path. His experiences as a PP&L field employee and his technical degree in electronics proved beneficial in starting the nation's first CATV system. People who lived in the small mountainous towns of northeastern Pennsylvania could now receive three Philadelphia television channels in their homes, while others congregated outside the Watson's appliance store to view this new communication medium. Cable TV was born!

The late John Watson was recognized by the U.S. Congress and the National Cable Television Association as the founder of the cable television industry. Mr. Watson can also claim many other firsts, including being the first cable operator to use microwave to import distant television stations, the first to use coaxial cable for improved picture quality, and the first to distribute pay television programming (HBO).

Today, Service Electric Television is a private, family owned cable business servicing over two hundred fifty thousand (250,000) subscribers located in approximately two hundred and fifty (250) communities in Central and Northeastern Pennsylvania and Northwestern New Jersey. On an industry-wide basis, Service Electric Television ranks as the sixteenth (16th) largest Multiple System Operator (MSO). Service Electric Cablevision, an affiliate company of Service Electric Television, serves over one hundred thousand (100,000) subscribers and one hundred (100) Pennsylvania communities in three operating regions.



Enter Zip Code

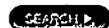
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- Ratecard
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- Live Web Chat

SECV's customer service is very user-friendly and it's easy to talk to someone almost right away. Everyone I've dealt with has always been polite, courteous, and professional.

Tim from Mohnton, PA

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Enjoy 2 Months FREE from SECV!

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Partners and Affiliates

Service Electric together with CATV Service

Serving the following PA areas:

Danville
Lewisburg
Milton
Watson town

888.300.1567

www.catvservice.com

Service Electric Cable TV and Communications Inc.

Serving the following PA and NJ areas:

Lehigh Valley, PA: 610.865.9100 OR 800.232.9100
Phillipsburg, NJ/ Hunderton, NJ: 800.225.9102
Wilkes-Barre/Northern Luzerne: 570.825.8508

www.sectv.com

Service Electric Broadband Cable

Serving the following NJ areas:

Sparta and parts of Sussex/Warren Counties: 973.729.7653

www.secable.com

Service Electric Telephone

www.setelephone.net

Ironton Telephone

www.ironton.com

PenTeleData

www.ptd.net

In 1995 Service Electric Cablevision, along with our Service Electric affiliates and other companies including Blue Ridge Communications, CATV Services, and Ironton Telephone formed a partnership called PenTeleData to offer a wide range of internet services to residential customers and commercial businesses throughout Pennsylvania and New Jersey.

EXHIBIT 2

Tom J. Dougherty

From: Lutzker, Gary [glutzker@dowlohnes.com]
Sent: Wednesday, December 19, 2012 8:56 PM
To: Tom J. Dougherty
Cc: Scott Johnson
Subject: WACP Carriage

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Tom:

We received WACP's Carriage Complaint today. Is the Bureau planning to hold off on the PN for this for a minute while we resolve the issue? Have you heard back from your client regarding Service Electric's proposal? In any case, we should be able to get this done in plenty of time.

By the way, Service Electric Cablevision, Inc. (SECV) is a separate company from Service Electric Cable Television, Inc. (CATV). Your Exhibit 5 includes a letter from Joe Macus at CATV. Although we have represented CATV on various matters in the past, our involvement in this case has been limited to SECV.

Anyway, do you have any time tomorrow or Friday to discuss? I have calls tomorrow at 2:00 and 4:00. Friday is more open for me. I will be out of the office all next week.

Best regards,
Gary

P.S. Good seeing you at the Chairman's Dinner.

Gary S. Lutzker | Dow Lohnes PLLC
Member | (P): 202-776-2107 | (F): 202-776-4107 |
(M): 202-415-2813 | glutzker@dowlohnes.com
18513.0009

EXHIBIT 3

Tom J. Dougherty

From: Lutzker, Gary [glutzker@dowlohnes.com]
Sent: Thursday, December 20, 2012 10:51 AM
To: Tom J. Dougherty
Subject: RE: WACP Carriage

I sent to SECV, but not CATV. I can forward it to Joe, but you also should serve him with a paper copy if you have not already.

Best,
Gary

From: Tom J. Dougherty [mailto:dougherty@fhhlaw.com]
Sent: Thursday, December 20, 2012 10:21 AM
To: Lutzker, Gary
Subject: RE: WACP Carriage

Gary,

Did you send the PSR to CATV? Thanks. Tom

Thomas J. Dougherty, Jr., Esquire | Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100 | Arlington, VA 22209
Tel: 703.812.0409 | Fax: 703.812.0486 | Mobile: 202.714.7024
Dougherty@FHHLAW.com | www.FHHLAW.com | www.commlawblog.com

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Best regards,
Gary

P.S. Good seeing you at the Chairman's Dinner.

Gary S. Lutzker | Dow Lohnes PLLC
Member | (P): 202-776-2107 | (F): 202-776-4107 |
(M): 202-415-2813 | glutzker@dowlohnesh.com
18513.0009

EXHIBIT 4

Tom J. Dougherty

From: Tom J. Dougherty
Sent: Friday, December 21, 2012 9:48 AM
To: 'macus@sectv.com'
Subject: Petition for special relief
Attachments: SERVICE ELECTRIC PSR (00468486).pdf

Mr. Marcus,

Last week, we filed a petition with the FCC for carriage of TV station WACP, Atlantic City, NJ, on the Service Electric cable systems. Believing that Gary Lutzker was representing all Service Electric affiliates, we served a copy on him. He subsequently informed me that, while he normally represented all of the Service Electric affiliates, he was not representing Service Electric Cable TV & Communications. He told me that he could forward a copy of the petition to you but that I also should do that. In accordance with his request, please find attached to this email a copy of the petition (which also appears on the FCC's Electronic Comment Filing System under holding Docket 12-1, at http://apps.fcc.gov/ecfs/comment_search/input?z=dw2c).

This petition relates to WACP's carriage election and subsequent carriage request letters dated June 6 and September 14, 2012. The CUID's involved are listed on the attachment to each letter, and those letters are attached to the petition as its Exhibits 1 and 3. Several of the CUIDs are held by Service Electric Cable TV & Communications. As you may recall, you responded to the September 14 letter by a letter in which you informed us that your engineers could not receive the WACP signal. Your letter, which is an exhibit to this petition, invited WACP to discuss alternatives to carriage. We remain amenable to such discussions, and would prefer to resolve the carriage issues (which appear technical in nature) outside of FCC processes. That said, we filed the petition to preserve WACP's rights, recognizing that ultimately arranging for carriage always involves cooperation between the parties. To that end, we are more than happy to defer any time for response that FCC rules may impose on you while we discuss carriage.

Please let me know when it would be a good time for our respective engineers to speak.

Thanks. Tom Dougherty

Thomas J. Dougherty, Jr., Esquire | Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100 | Arlington, VA 22209
Tel: 703.812.0409 | Fax: 703.812.0486 | Mobile: 202.714.7024
Dougherty@FHHLAW.com | www.FHHLAW.com | www.commlawblog.com

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EXHIBIT 5

Tom J. Dougherty

From: Tom J. Dougherty
Sent: Friday, December 07, 2012 11:09 AM
To: 'Lutzker, Gary'
Subject: FW: PSRs

Gary,

I asked Steve Broeckaert whether we could agree to a deferral of the filing deadline and, as shown in his response below, the answer is no. Tom

Thomas J. Dougherty, Jr., Esquire | Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100 | Arlington, VA 22209
Tel: 703.812.0409 | Fax: 703.812.0486 | Mobile: 202.714.7024
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From: Steven Broeckaert [mailto:Steven.Broeckaert@fcc.gov]
Sent: Thursday, December 06, 2012 12:04 PM
To: Tom J. Dougherty
Subject: RE: PSRs

Tom,

We can't allow that. What we would welcome is the filing of a petition that states therein, or in a companion pleading, that petitioner is only filing to preserve its rights but requests that we toll the 120 day statutory period while the parties pursue a voluntary arrangement and that petitioner will either subsequently (1) withdraw the petition because carriage has been arranged, or (2) notify the Commission that there is no carriage arrangement and to commence processing the petition.

Sound OK?

Steve

Steven A. Broeckaert
Deputy Chief, Policy Division, Media Bureau
Federal Communications Commission
steven.broeckaert@fcc.gov

Non-Public: For Internal Use Only

From: Tom J. Dougherty [mailto:dougherty@fhhlaw.com]
Sent: Thursday, December 06, 2012 10:17 AM
To: Steven Broeckaert

Cc: Scott Johnson
Subject: PSRs

Steve,

I am nearing the deadline to file a petition for special relief for an order compelling a cable operator to carry a local TV station. The cable operator and my client are hopeful that the remaining technicalities can be resolved soon, but they will not be before I have to file or lose my right under Rule 76.61 to file. My question is whether the Bureau would honor an agreement between the broadcaster and the cable operator to allow the PSR to be filed late in the event that our joint efforts breakdown? Thanks. Tom

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CERTIFICATE OF SERVICE

I, Michelle Brown Johnson, hereby certify that on this 9th day of January, 2013, I caused a copy of the foregoing "Clarification, Supplement and Correction of Record to Petition for Special Relief by Order Of Carriage" to be served via U.S. mail, postage prepaid, and email upon the following entity:

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