

# **EXHIBIT**

## **1**

**REDACTED – FOR PUBLIC INSPECTION**

**PAGES INTENTIONALLY OMITTED**

# **EXHIBIT**

## **2**

**REDACTED – FOR PUBLIC INSPECTION**

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# **EXHIBIT**

**3**

**REDACTED – FOR PUBLIC INSPECTION**

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# **EXHIBIT**

**4**

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

In the Matter of:	)		
	)	Docket No.	WC 06-122
AMV Gateway, LLC Request for	)		WC 96-45
Review of a Decision of the	)		WC 97-21
Universal Service Administrator	)		

**AFFIDAVIT  
*Of*  
RICHARD DUKE**

Richard Duke, being duly sworn, deposes and says that:

1. I am the President of AMV Gateway, LLC (“AMV”).
2. My family has been engaged in editing and production work and support for live and recorded television shows, movies, live sports events and newsgathering for decades.
3. My family first entered the marketplace in 1976 as a production and editorial equipment rental business. By 1980 it began production and editing video rentals and in 1989 it bought studios for larger productions.
4. In 2003, AMV expanded its operations by acquiring Williams Communications’ “teleport” facility located in Carteret, New Jersey. AMV converted the newly acquired physical space into an adjunct video production and post-production facility to provide services to syndicators, television networks, film production companies, and similar customers that expanded our in house capabilities because AMV was able to quickly receive and deliver programs and materials for production.
5. After purchasing the physical plant from Williams Communications, AMV installed equipment such as hundreds of television monitors, Dolby encoders and production systems that

enabled it to edit programming, insert commercials and redact (*i.e.*, “bleep out”) indecent audio, record and replay a delayed version of programming information and other services.

6. During the acquisition, the management at Williams Communications incorrectly advised AMV that it would need to obtain a FCC Filer ID and contribute to the universal service fund.

7. Williams Communications, a provider of telecommunications services, based this advice on its own practice and operations, not on the legal classification of AMV’s services.

8. AMV’s management failed to recognize at this time that the video production and post-production services offered by AMV were vastly different than what was offered by Williams Communications.

9. AMV did not independently evaluate the proper legal classification of its video production and editing services or the accuracy of Williams Communications’ statements.

10. Not understanding the true nature of its services, AMV began filing FCC Form 499s and incorrectly checked a block on the form to identify itself as a provider of satellite services, following the practice of the predecessor owner of the facility. In June 2011, USAC’s Internal Audit Division notified AMV that it was auditing AMV’s 2010 FCC Form 499-A, reporting revenues for calendar year 2009.

11. On June 20, 2012, AMV submitted its response to USAC’s Internal Audit Division’s draft findings, wherein, among other things, the Internal Audit Division reclassified some of AMV’s revenues as telecommunications.

12. In its response and as I set out in greater detail below, AMV explained that it provides video editing and TV production work on live and recorded television shows and it does not provide telecommunications service.

13. AMV explained that while it uses the telecommunications it purchases from third-party suppliers (like Verizon) to provide its TV production and editing services, AMV does not offer “telecommunications,” as defined in the Communications Act to its customers.

14. Following conversations with the auditors, USAC indicated its willingness to accept the information provided in the response and AMV’s position but requested additional documentation to support the statements made in the June 20, 2012 response.

15. USAC requested additional documents that would provide a more complete picture of the end product AMV customers expect to receive.

16. In particular, USAC sought information from eleven AMV customers.

17. AMV then submitted various documentation evidencing the end product those eleven customers expected to receive, including, as suggested by USAC, emails, statements of work, and contracts/service orders as available.

18. The supplemental response explained that the array of television production and editing services for live and recorded entertainment, sports and news programs AMV provided to customers spans from simple to complex.

19. Notwithstanding the vast array of services offered, one key fact remained true for all of AMV’s customers. Namely, in every instance, AMV changes the form and content of the live or recorded video with encoding and other modifications in addition to monitoring and reviewing the video.

20. The services provided by AMV are exactly the same services provided by any broadcast network. Recording, playback, editing, duplication, encoding and transferring of the material between parties to further complete show material ultimately destined for public consumption.

21. Until the audit, AMV was unaware that broadcast shorthand and terms of art could be used in an audit context to determine the legal classification of services provide for universal service contribution purposes.

22. Terms such as “uplink,” “downlink,” “transmission” and others that are understood in the broadcast and video production industry to incorporate an array of services do not hold the same meaning as the auditors ascribed to them in the audit. Because of this, AMV, and its employees, used terms of art that were plain to its customers to describe its services.

23. In addition, AMV completely misunderstood the federal universal service support mechanism and the associated contribution obligations of providers.

24. AMV does not have a full time legal team to manage the USF billing and collection process.

25. Moreover, our accounting firms were also confused by the USF billing and collection process.

26. AMV’s misunderstandings are exemplified by the fact that AMV included USF costs that it paid to its telecommunications suppliers on invoices to its customers.

27. In other words, AMV has been collecting and remitting the USF fees it collects to USAC based on a mistaken belief that USF assessments are based on what AMV purchases and utilizes to provide those services.

28. AMV always considered itself an end user of telecommunications, and not a reseller of telecommunications services.

29. We found the definition of telecommunications, and knew that we were changing the form of every signal we dealt with, so we genuinely did not believe we were providing

telecommunications. Also, our customers do not have a choice of where the connectivity is but ultimately need a connection to our facility to satisfy a production need.

30. We asked the FCC if our services really constitute telecommunications. We never received any clarity.

31. AMV concluded that it should pass on the USF fees imposed by its telecommunications vendors to its own customers, but did not seek exemption from pass-through charges from its telecommunications vendors.

32. AMV believed it was following an appropriate model of the predecessor owner of the facility and of other companies, but we did not understand that as end users of telecommunications we do not have a direct contribution obligation of our own.

33. As a result of imposing USF surcharges, AMV has lost business to its competitors because the USF charge makes us uncompetitive. By paying our carriers and taking the most conservative approach to USF imaginable, we felt we had all bases covered and fully complying with the USF rules and regulations.

34. Despite all of our efforts, we were blindsided by a USAC audit.

35. If USAC is correct and we need to be charging USF on all the services they suggest, we will not be able to be competitive in the broadcast arena. We will likely lose most of our customers as they will either take their work in-house or to another company that does not collect USF.

36. Since the audit it has become abundantly clear to me that we never should have been charging our customers in the first place -- had we not, we never would have been audited and completely misunderstood and mislabeled by USAC.

37. In short, prior to the audit, AMV failed to properly understand the classification of its services, the significance of using terms of art when describing its services.

38. Instead, AMV accepted as true comments made by Williams Communications, not realizing the legal implications of the different services it provides.

39. During the course of the audit, AMV has better understood the USF framework and that it is not a reseller of satellite transport or other telecommunications services and its TV production and editing services are not subject to USF obligations.

40. However, it failed to conduct the proper inquiry when it acquired its transport facility and unfortunately, accepted Williams Communications' classification despite the fact that the services offered by Williams Communications were significantly different than the TV production and editing services offered by AMV.

41. Even USAC's Internal Audit Division's employees told me that AMV's biggest mistake was to register with the FCC and file a FCC Form 499-A in the first instance.

42. I was led to believe that none of our competitors (i.e. television networks, post production facilities, and switching hubs) were USF contributors but because AMV obtained a FCC Filer ID and contributed to the USF, it now was part of the system and would have to disprove its classification as a telecommunications provider.

43. As set forth in greater detail below, AMV has provided documentary and testimonial evidence to show that it was not and does not offer on a stand alone basis telecommunications services; that its customer do not order nor do they believe they are being provided telecommunications services; that AMV always changes the content and form of the videos that it is working on for its customers.

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44. It should be clear that USAC and its auditors failed to understand the true nature of AMV's services.

## **AMV's Facility and Employees**

45. AMV's adjunct production and post production facility is located in Carteret, New Jersey.

46. This New Jersey facility houses over 300 television monitors and AMV's video technicians performing their various production and post production services.

47. AMV's employees are skilled video and audio engineers, graphics specialists, and video/audio editors that provide the quality control services for the customers' television video broadcasts and recorded programming before the TV show is put on the air.

48. AMV does not broadcast any programming to the general public. The programming is all copyright protected, and AMV is providing production or post production services with all program information that is destined to its customers who will ultimately disperse to the general public.

## **AMV's Customers**

49. AMV's customers are TV syndicators involved in producing programs, television networks including [REDACTED], and film production companies.

50. These customers hire AMV to provide production and post production work on their live and recorded television shows.

## **AMV changes the form and content of the information as sent and received**

51. AMV does far more than pass on a video signal from one place to another.

52. Video never leaves AMV's facility in the same form and format as it arrives.

53. AMV monitors the quality of video, adds encoding and other content, changes the format and aspect ratio, adds graphics, adds coding for rating services, adds close captioning, adds commercials and otherwise alters the transmitted information depending on a particular customer's specifications as is required.

54. Depending on the type of signal involved, AMV might also make other conversions, such as aspect ratio, format, or standards conversions.

55. Television signals can have different sizing and format requirements in order for the video to appear correctly on a television screen. Because the television signals must first be converted from video to data and/or IP to be carried over satellite or digital media, none of these parameters are in place when AMV receives the television signal.

56. As a result, converting signals is a necessity if the format of the program arriving at AMV is not the required specification of the receiving customer.

57. For example, SD is most commonly sent in a 4:3 ratio of width to height, and HD is 16:9. Some broadcasters will prefer signals to be sent in SD as a 16:9 format to create a black space above and below the picture.

58. Many older programs that were originally shot in SD 4:3 ratio are being broadcast on HD networks and will have black on the sides of the picture. AMV can convert the aspect ratio or replace the black space with a graphic element instead.

59. Because conversions cause degradation in the show quality, all efforts are made to reduce the number of times a signal is converted. The signal originator will usually not sacrifice any quality degradation to the product, so AMV normally performs the conversion once to the standard required by the recipient.

60. AMV's TV production and editing service incorporates an array of instances where AMV is changing the form and content of the video sent to its Customers.

**AMV uses telecommunications services to provide its TV production and editing services**

61. AMV purchases telecommunications services from several suppliers in order to provide its TV production and editing service.

62. For example, it purchases fiber loops from Verizon so that AMV can establish a direct connection between a customer's location and AMV's facility.

63. AMV's customers cannot and do not use that fiber loop for any purpose other than to send video to AMV for production services and quality control.

64. Inversely, while it is possible for a telecommunications company like Verizon to provide two-way communications via fiber circuits, AMV must procure separate single direction circuits from the carriers.

65. AMV cannot provide two-way communications for any of its services. Video can be made to travel either to our facility OR from our facility but not both directions.

66. In other words, AMV purchases the fiber for its own business purposes – establishing a connection between itself and its own customer – but AMV's customer cannot, in turn, specify the points of the fiber loop or what type of information is sent over that loop.

67. The loop is in place solely to make possible AMV's production and quality control services.

68. Even if the loop may only be used an hour or less a day in some cases, AMV incurs a monthly cost to establish and to maintain this connection between AMV and its customer.

69. The constant connection is necessary so AMV is on "standby" with a ready direct connection in the event the customer needs AMV to work on a program to be televised.

70. The cost associated with this fiber is considered an overhead expense that AMV recovers from its customer through its monthly fee.

71. Whereas AMV's telecommunications supplier generally permits AMV to transmit whatever information AMV chooses over that loop, AMV's customers do not have that ability.

72. AMV's customers can only use that loop to send video to AMV so that AMV can provide video production services and deliver the edited video back to the customer.

**AMV does not provide standalone telecommunications**

73. Although the various costs and components that AMV uses to provide its video production services may be itemized on customer bills, and revenues from these services are linked to AMV's underlying costs in accounting books and records, AMV does not provide any of its customers the option of purchasing telecommunications services as a *standalone* product.

74. Thus, while AMV purchases separate telecommunications components from its suppliers, AMV's customers do not use telecommunications components as standalone products separate and apart from AMV's TV production and editing services.

75. AMV's customers hire AMV for the specific purpose of changing the form and content of its videos before broadcast.

76. When AMV's customers need telecommunications services, such as satellite services for their own use, they go directly to a satellite service provider to obtain the telecommunications services, not to AMV.

77. In other words, AMV uses telecommunications to obtain the video content for which AMV's customers have requested production services and to send the finished video content to its customers.

78. The underlying telecommunications supplier, *e.g.*, Verizon, provides the transmission to AMV for this purpose.

**While AMV itemizes its underlying costs of providing service, its customers cannot separately purchase or use any one of these cost inputs for any other purpose.**

79. Over the years, AMV has strived to provide its customers with transparent bills. That is, invoices that itemize to the greatest extent as possible the underlying costs that make up the service fee charged by AMV.

80. As a result and purely for the customer's understanding and convenience, AMV's invoices reflect, in some instances, AMV's own underlying costs and inputs.

81. These costs and inputs include the various telecommunications services that AMV must acquire and use to provide its production and editing services.

82. While these components are itemized on the customers' bills, they are not "resold" to AMV's customers, either individually or as a bundle.

83. Moreover, these line items do not reflect the functionality that is being supplied to AMV's customers, nor could a customer purchase any of these line items directly from AMV on a standalone basis for any purpose.

84. The line-item identification of these costs are akin to the overhead that AMV rolls into its service charges.

85. AMV has never considered itself to be reselling these services that it purchases to operate its business.

86. AMV has never offered these telecommunications components that it purchases to the public.

### **AMV's Post Productions Services are Included in What it Called Uplink Services**

87. AMV offers what it terms "uplink" services, but uplink may not even be used for the actual service AMV provides.

88. The term "uplink," as used by AMV, refers to the signal that is outbound from its facility, it encompasses services involving post-production coding, editing, monitoring and quality control of television programming.

89. With these services, a customer will send the video to AMV via the private fiber loop or by some other means, such as videotape or file delivery.

90. When the video arrives at AMV's facility, AMV converts the video signal in order to process the video, view it, and add encoding and encryption to the video.

91. AMV uses a Harris NetVX decoder and HD/SDI router for signal processing, which includes NAVE encoding (for Neilson ratings), closed captioning, some commercial insertion additions, video tape records (VTR) and disk records (DDR), Evergreen playback and other encoding, depending on the particular customer's needs.

92. ATIS may be added to analog signals as part of what AMV terms "uplink" services.

93. ATIS is a unique broadcast identification that allows broadcast networks to identify the location of the transmission point of a signal.

94. Once processed, the video signal is converted from video to data with the HD/SDI encoder. The video travels an IP path to a satellite dish.

95. AMV might send a converted signal via satellite using the satellite services AMV has purchased for its own use, or the signal might travel via satellite services AMV's customers have purchased directly from a satellite service provider for their own purposes.

96. The monthly subscription price of the “uplink” service is higher where AMV uses its own satellite services versus where the customer transmits the signal on its own satellite services.

97. In either case, AMV employees provide quality control as the video signal is sent via satellite, observing the program on monitors at the AMV facility so that AMV employees can contact the satellite service provider if they notice “sparkles” or other fade issues with the video quality.

98. All of these services appear as one line item called “uplink” on a customer invoice.

### **Downlink**

99. AMV also offers what it calls “downlink” services.

100. Typically, “downlink” services involve AMV capturing program information for quality control analysis and production services.

101. For example, a network might request pre-production services on a sports event to prepare video feeds for further editing at the customer’s studio.

102. Network customers send video to AMV via satellite services that the customer has purchased directly from a satellite service provider. When the signal comes to AMV’s facility, the signal is converted from satellite dish RF frequency to L-Band frequency via a decoder.

103. The signal is converted to HD/SDI Video, not simply in order to complete the transmission from the customer to AMV, but in order to enable AMV to view the video on its monitors so that it can acknowledge receipt of the correct video and provide quality control monitoring, check captioning, and other production and editing services.

104. For example, the signal is processed internally within the facility through an HD/SDI video router to devices that can check for closed captioning decryption or loudness monitoring.

105. After AMV has provided quality control and production services, the video is converted to data and sent along an IP data path and then via a Verizon video circuit (loop) to the customer site.

### **Redundancy Services**

106. AMV's facility also provides redundancy services in case of some catastrophic failure.

107. For example, if a studio goes dark during a live show, AMV will substitute an "Evergreen" show in its place – a television show that does not have content tied to any particular time of year or day.

108. This generic programming does have the current daily commercials inserted, or space for local commercials that a broadcaster could insert, with use of AMV's facility and employees, so that commercials can still air during any time when a studio is dark.

109. AMV provides this "playback to nowhere" service during live programming, so that the Evergreen show is running concurrently and would be available for broadcast immediately in case something happens with the live program or the studio.

### **AMV's Detailed Billing**

110. AMV's customers often ask us for an explanation for our pricing.

111. In an effort to satisfy our customers' desire for full disclosure and also to assist in the explanation for our pricing, AMV decided to create detailed invoices.

112. These invoices include our underlying costs.

113. Often the telecommunications components represent the highest expenses that we incur.

114. This explains why we identify the telecommunications components that AMV uses on our invoices.

115. INTENTIONALLY LEFT BLANK.

### **AMV's Competitors**

116. AMV does not compete with or provide the same services as its underlying telecommunications suppliers.

117. AMV uses telecommunications suppliers to connect directly to customers that require customized video processing for their signals.

118. AMV's underlying suppliers do not provide the production, graphics and editing services that AMV offers its customers.

119. AMV's competitors are television production and post production facilities that choose to do the production and editing work in-house rather than out-source the work to AMV.

120. I am not aware of any other company/network that offers the same type of production, graphics and editing services being classified as a telecommunications service provider.

121. Classifying AMV's services as telecommunications will undoubtedly make it more difficult for AMV to compete with the non-contributing networks.

### **AMV Does Not Provide Telecommunications**

122. As a result of this USAC audit I have spent numerous hours with legal counsel evaluating AMV's services and understanding the legal classification of AMV's services.

123. I am familiar with and understand the definition of "telecommunications" as set forth in the Communications Act of 1934, as amended (the "Act").

124. I understand that "telecommunications" as defined by the Act is "the transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received."

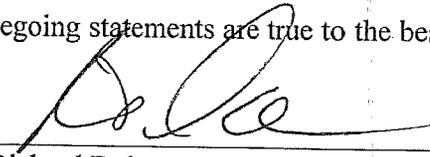
125. Based on my intimate understanding of AMV's services and the services' functionality provided to AMV's customers, I can state without hesitation that AMV does not provide telecommunications services to its customers.

126. AMV does not market or represent to its customers that it is selling or providing telecommunications services.

127. Our customers have their own underlying telecommunications providers that they use for their telecommunications needs. They do not seek nor expect AMV to provide them with telecommunications services that they can use for their own purposes.

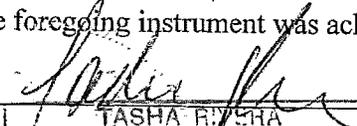
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Under penalty of perjury, I hereby affirm that the foregoing statements are true to the best of my knowledge, information and belief.

  
Richard Duke

State of New York )  
County of NY ) ss.:

The foregoing instrument was acknowledged before me this 20<sup>th</sup> day of June 2013 by

  
TASHA RIVERA  
Notary Public, State of New York  
Registration #01R16122616  
Qualified in Bronx County  
Commission Expires February 14, 2017  
Notary / Registration Number

2/14/2017  
My Commission Expires

**EXHIBIT**

**5**

# REDACTED - FOR PUBLIC INSPECTION

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

In the Matter of )  
AMV Gateway, LLC Request for )  
Review of a Decision of the )  
Universal Service Administrator )

**AFFIDAVIT  
*Of*  
LENNY LAXER**

Lenny Laxer, being duly sworn, deposes and says that:

1. I am the Vice President at AMV Gateway, LLC ("AMV").
2. I work out of AMV's Carteret, New Jersey facility.
3. As part of my duties as Vice President for AMV I am responsible for selling AMV's television broadcast, recording, editing and production services and developing relationships with AMV's customers
4. AMV's customers are: TV syndicators involved in producing programs; television networks including [REDACTED] and film production companies.
5. These customers hire AMV to provide editing and production work on their live and recorded shows.
6. Given my role at AMV I have first-hand knowledge of the services that AMV's customers purchase and the services AMV provides.
7. I regularly communicate with AMV's customers about the services and oversee their accounts.
8. Our customers hire AMV to do far more than pass on a video signal from one place to another.

9. Our customers hire AMV to monitor the quality of video, add encoding, add closed captioning, change the format and aspect ratio, and otherwise alter the customers' video depending on the particular customer's specifications.
10. As part of its services, AMV provides its customers with what we identify as "uplink" services. I explain to our customers that the term "uplink," as used by AMV is consistent with its usage in the video production industry. That is, the term "uplink" encompasses services involving post-production coding, editing, monitoring and quality control of television programming.
11. I also explain what we identify as "downlink" involves the process of when a customer sends a video to AMV for production services.
12. I also explain that AMV's Carteret facility can provide redundancy services in case of some catastrophic failure at our the customer's studio.
13. I have recently become familiar with and understand the legal definition of "telecommunications" as set forth in the Communications Act of 1934, as amended (the "Act").
14. I understand that "telecommunications" as defined by the Act is "the transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received."
15. I have never sold, on AMV's behalf, telecommunications services.
16. None of AMV's customers have ever requested that we provide them with telecommunications services.
17. All of AMV's customers have their own third-party telecommunications and/or satellite service provider(s) that they use for their telecommunications needs.



**EXHIBIT**  
**6**

**REDACTED – FOR PUBLIC INSPECTION**

**PAGES INTENTIONALLY OMITTED**

# **EXHIBIT**

**7**



9. The pictures I took depict how an AMV technician monitors incoming feeds side by side.
10. Even though the images in the monitors seem to be the same, in reality there is something slightly different to each.
11. One image will represent the inbound signal. The next represents the signal after close captioning has been encoded and visible. While the other is close captioned but hidden.
12. After all the various decode and encodes are done, AMV technicians view the signal before delivering the program to the customer.
13. If the programming is delivered to satellite, there will be a corresponding "return" feed to the AMV facility allowing it to verify signal quality and confirm that the signal is in fact good.
14. In other words, the monitor wall shows signals as it passes through all of the devices so AMV can isolate any issues that may appear with Neilsen encoding, closed captioning or loudness processing.
15. Because all of this work happens in real time AMV needs the ability to isolate potential signal problems immediately.
16. The photographs also show the waveform monitors, vector scopes directly above some of the monitors built into the console desk to ensure all signals meet network standards.
17. Also depicted is the spectrum analyzer used to monitor the satellite signal. These analyzers identify variations or interferences which then requires manual restoration by an AMV technician.

18. There are also green button panels in the console that represent the HD/SDI Router panels. This router provides AMV technicians with the ability to move the signal to different pieces of equipment to access Disk Recorders or Playback devices, encoders, decoders, loudness monitoring, Dolby processors etc.
19. Also shown on the console are several phones that allow for direct communications with customers that are sending AMV signals or receiving AMV signals.  
Transferring the signals after processing is a major coordination effort undertaken by AMV and the customer. This is a task that can not be automated.
20. Constant monitoring of the console and equipment depicted in the photographs is needed as visual confirmation of signal quality is required for all program signals.

**[REMAINDER OF PAGE INTENTINALLY LEFT BLANK]**

Under penalty of perjury, I hereby affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Michael Carberry  
Michael Carberry

State of RI )  
County of RI ) ss.:

The foregoing instrument was acknowledged before me this 20 day of June, 2013 by

Tasha Rivera

TASHA RIVERA  
Notary Public, State of New York  
Registration #01RI612616  
Notary / Registration Number  
Commission Expires February 14, 2017

2/14/2017  
My Commission Expires

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

In the Matter of	)	
	)	Docket Nos. WC 06-122
AMV Gateway, LLC Request for	)	WC 96-45
Review of a Decision of the	)	WC 97-21
Universal Service Administrator	)	

**CERTIFICATE OF SERVICE**

I, Sherry Reese, hereby state and affirm that copies of AMV Gateway, LLC's Request for Review of a Decision of the Universal Service Administrator, were served via Email and First Class Mail on this 21st day of June 2013, upon the following:

Kristin Berkland, Assistant General Counsel  
Universal Service Administrative Company  
2000 L Street NW  
Suite 200  
Washington, DC 20036  
([kberkland@usac.org](mailto:kberkland@usac.org))

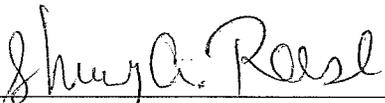
Jen Crowe, Senior Internal Auditor  
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Charles Salvator, Senior Manager of Internal Audit

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\_\_\_\_\_  
Sherry Reese