

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Service Electric Cablevision, Inc.

Petition for Waiver of Sections 76.601 and
76.605(a) of the Commission's Rules

)
)
)
)
)

CSR-____-Z

To: The Secretary's Office
Attn: The Media Bureau

PETITION FOR WAIVER

Service Electric Cablevision, Inc.

Gary S. Lutzker

BAKER & HOSTETLER LLP
1050 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20036
(202) 861-1500

Its Attorneys

November 12, 2013

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
Service Electric Cablevision, Inc.)	CSR-____-Z
Petition for Waiver of Sections 76.601, 76.605(a), and 76.1704 of the Commission's Rules)	

To: The Secretary's Office
Attn: The Media Bureau

PETITION FOR WAIVER

Service Electric Cablevision, Inc. ("**Service Electric**"), by its attorneys and pursuant to Sections 76.7 and 76.605(b) of the rules of the Federal Communications Commission (the "**Commission**"),¹ hereby petitions the Media Bureau for waiver of Sections 76.601, 76.605(a), and 76.1704 of the Commission's rules.² The waiver will permit Service Electric to bring the widely acknowledged public interest benefits of all-digital cable operations to its rural cable system service areas in Birdsboro, Bloomsburg, Danville, Hazleton, Mahanoy City, and Sunbury, Pennsylvania (the "**Communities**")³ without being required to comply with inapplicable proof-of-performance ("**PoP**") testing and technical standards designed for twentieth century analog cable television systems and NTSC channels.

A grant of the requested waivers, and the resulting expansion of all-digital operations in Service Electric's rural Communities, will significantly advance longstanding congressional and

¹ 47 C.F.R. §§ 76.7, 76.605(b).

² See 47 C.F.R. §§ 76.601, 76.605(b).

³ Service Electric's Hazleton (PSID 001707) and Mahanoy City (PSID00714) cable systems are consolidated, technically integrated systems. Its other systems in Birdsboro (PSID001704), Bloomsburg (PSID002781), Danville (PSID005189), and Sunbury (PSID007617) are separate systems. All told, these five cable systems serve more than 160 rural Pennsylvania Communities. The Communities, along with their FCC assigned Physical System ("**PSID**") and Community Unit ("**CUID**") numbers are set forth in Exhibit A attached hereto. Service Electric plans to upgrade these systems to all-digital operations with no more than 250 customers per node by the end of November 2013.

Commission policies to promote the transition to digital services and bring advanced communications services to rural areas. Service Electric, moreover, will continue to perform relevant digital testing of picture and audio quality from its headends and from customer premises and field locations as necessary in response to known or reported service quality issues. Waiver of the Commission's analog technical standards, PoP testing rules, and associated public file requirements in these circumstances would serve the purposes of those rules more fully than their application to Service Electric's all-digital operations, and would eliminate undue burdensome and unnecessary costs for Service Electric. The Bureau therefore should grant the requested waiver forthwith.

BACKGROUND

The Commission has maintained cable television technical standards since 1972⁴ and has established a mandatory testing regime to govern signal quality for analog, NTSC cable channels.⁵ The Commission, however, understood that compliance with those standards may be impossible for all future developments in cable plant technology and provided for relief in Section 76.605(b) of the rules.⁶ More recently, the Bureau has recognized that “[t]he transition to digital encoding for cable systems is such a development as the digital waveform no longer has the characteristics Section 76.605(a) seeks to measure[,]” and that requiring cable operators “to perform Proof of Performance tests as written on . . . all-digital systems and maintain the results for inspection imposes an unnecessary expense and provides no benefit to the public.”⁷ The Commission also has repeatedly acknowledged the public interest benefits of digital cable

⁴ See Amendment of Part 74, Subpart K, of the Commission's Rules and Regulations Relative to Community Antenna Television Systems, *Report and Order*, 36 FCC 2d 143 (1972), *aff'd in part and modified in part*, 36 FCC 2d 326 (1972).

⁵ Cable Television Technical and Operational Requirements, *Report and Order*, 7 FCC Rcd 2021 (1992) (“*CATV Requirements Order*”). See also, Petitions for Reconsideration, *Memorandum Opinion and Order*, 7 FCC Rcd 8676 (1992).

⁶ 47 C.F.R. § 76.605(b).

⁷ *RCN Corporation*, 24 FCC Rcd 12874, 12875 (Med. Bur. 2009), *reconsideration granted on other grounds*, 25 FCC Rcd 5537 (2010).

technologies⁸ and has specifically recognized that the current PoP testing and technical standards are outdated and excessively burdensome in the context of the rapid transition to all-digital cable systems. It consequently proposed revised rules and standards in the *2012 NPRM*.⁹

The Commission, however, has not provided guidance to cable operators that have upgraded, or will in the interim upgrade, to all-digital systems. Those operators, including Service Electric, may be subject to local government enforcement of the Commission's technical standards, PoP testing, and related public file requirements,¹⁰ which are designed to measure analog wave-form characteristics that do not exist in their all-digital cable systems. In other words, absent the requested waiver, Service Electric will be subject to potential legal jeopardy for implementing the Commission's policies to deploy all-digital cable systems, bringing advanced communications services to rural areas, and providing undeniable benefits to its customers.

⁸ See, e.g., Cable Television Technical and Operational Requirements, *Notice of Proposed Rulemaking*, 27 FCC Rcd 9678 (2012) (the "*2012 NPRM*") ("The ongoing transition from analog to digital cable systems is bringing widespread benefits to consumers, enabling them to enjoy more advanced services, a wider range of programming choices, and better picture quality." Statement of Commissioner Ajit Pai); Carriage of Digital Television Broadcast Signals, *Fifth Report and Order*, 27 FCC Rcd 6259, 6562 (2012) (the "*Viewability Order*") ("Going from analog to digital will result in better and more efficient service to customers, and will allow cable companies to offer more content with less bandwidth." Statement of Commissioner Mignon L. Clyburn); *Third Report and Order and Third Further Notice of Proposed Rule Making*, 22 FCC Rcd 21064 (2007) ("We encourage cable operators to upgrade their systems and deploy solutions, such as switched digital, QAM or IPTV, to increase system capacity for more channels, enhanced services and faster broadband speeds. Such technological innovations promote efficient network management and the greater diversity of programming." Statement of Commissioner Jonathan S. Adelstein). See also Basic Service Tier Encryption, *Report and Order*, 27 FCC Rcd 12786 para. 3 (2012) (noting the swift introduction of all-digital cable systems).

⁹ See *2012 NPRM*, 27 FCC Rcd 9678.

¹⁰ See *CATV Requirements Order*, 7 FCC Rcd at 2035. Section 76.1704 of the Commission's rules requires cable operators to maintain PoP test data for a five-year period and make such data available to local franchising authorities and the Commission upon request. 47 C.F.R. § 76.1704.

DISCUSSION

I. Waiver Of The Technical Performance And Testing Standards Will Accelerate Deployment Of Digital Systems, Enhance Signal Quality And Advanced Services For Consumers, And Will Have No Negative Effects.

Under longstanding FCC and federal court precedent, the Commission should waive its rules for good cause shown in cases where circumstances “warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule.”¹¹ The Commission also recognized in the *CATV Requirements Order* that “[c]able system design is continually developing to provide additional services more efficiently to cable subscribers.” and “that it is important to encourage technological innovation and experimentation within the cable industry.”¹² The Commission therefore continued its pre-existing rule allowing cable operators to deploy technologies that “because of their basic design, cannot comply with one or more of the technical standards set forth” in Section 76.605(a) of the Commission’s rules, subject to “an adequate showing . . . which establishes that the public interest is benefitted.”¹³

These standards are plainly met in this case because: (1) the Commission has repeatedly acknowledged the public interest benefits resulting from the deployment of all-digital cable systems;¹⁴ (2) Service Electric’s all-digital upgrade will dramatically improve service for its customers in the Communities by providing, among other things, enhanced picture quality, advanced communications services, expanded and more diverse program offerings, more efficient network management, and faster broadband speeds;¹⁵ and (3) absent the requested waiver, Service Electric may be subject to legal action by local franchising authorities for non-

¹¹ See, e.g., *Comsat Corp.*, 12 FCC Rcd 12059, 12066, para. 14 (1997); see also, e.g., *Intel Corp., et al.*, 25 FCC Rcd 7539, 7542, para. 7 (2010); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1157(D.C. Cir. 1969).

¹² *CATV Requirements Order*, 7 FCC Rcd at 2031, paras. 60 and 61.

¹³ 47 C.F.R. § 76.605(b).

¹⁴ See n.8 *supra*.

¹⁵ *Id.*

compliance with Commission rules that are inapplicable to Service Electric's all-digital operations.¹⁶

Service Electric, moreover, will continue monitoring and testing the visual and audio quality of its digital signals using existing digital equipment that has been successfully maintaining the high-quality of Service Electric's existing digital services. This monitoring and testing includes headend testing and periodic node and customer premises testing in response to known or reported signal-quality issues. For example, Service Electric monitors and tests digital modulation error rates ("MER") and bit error rates ("BER") using QAM analyzers, and uses stream analyzers to monitor and test digital video and audio quality. These monitoring and testing procedures have successfully maintained the quality of Service Electric's digital services and have resulted in an extraordinarily low rate of service issues.

As the foregoing demonstrates, the requested waiver will provide a variety of widely recognized public interest benefits and have no negative effects. It also will advance the Commission's policy of transitioning to more efficient digital video technologies.¹⁷

II. Requiring PoP Tests For Service Electric's All-Digital Cable Systems Would Impose Substantial And Unnecessary Expense On Service Electric While Providing No Public Benefit.

In addition to the public interest benefits discussed above, the requested waiver will allow Service Electric to avoid the substantial and unnecessary costs of performing and documenting the PoP tests currently reflected in Sections 76.601, 76.605(a), and 76.1704 of the Commission's rules. Those tests and standards provide no benefit to customers in all-digital cable systems because they only measure analog and NTSC signals that do not exist on all-digital systems.

The Bureau has previously recognized that testing and documenting the current PoP standards as written on all-digital systems "imposes an unnecessary expense and provides no

¹⁶ The Commission has recognized that compliance with its technical standards is a significant "component of franchising authorities' renewal review." *CATV Requirements Order*, 7 FCC Rcd at 2035, para. 82.

¹⁷ See, e.g., *Viewability Order*, 27 FCC Rcd 6529 at para. 2; *Commercial Availability of Navigation Devices, Third Report and Order and Order on Reconsideration*, 25 FCC Rcd 14657 at paras. 7, 45 (2010).

benefit to the public.”¹⁸ For digital signals, the Commission proposed in the *2012 NPRM* to adopt the “SCTE 40 Digital Cable Network Interface Standard, as the signal quality standard for QAM-based digital cable systems” and tentatively concluded it should require cable operators to “perform a test for each of the entries located on . . . [the SCTE 40] tables dealing with the delivery of cable video signals.”¹⁹

Service Electric estimates that the annual cost of performing, documenting, and maintaining the semi-annual PoP tests currently required by the Commission’s rules exceeds \$20,000 for each of the systems Service Electric plans to upgrade to all-digital service, and totals more than \$100,000 annually for all five Service Electric systems included in this Petition. Inasmuch as the Commission has acknowledged that for all-digital systems these costs are unnecessarily burdensome while providing no public benefits, the Bureau should waive them in this case. With regard to the tests proposed in the *2012 NPRM*, to comply with the proposed requirements, Service Electric would have to purchase additional test equipment with an estimated cost of \$40,000 for each of the cable systems it upgrades to all-digital service; *i.e.*, approximately \$200,000 for the five relevant Service Electric systems. As a small, family-run company, Service Electric is not in a position undertake such expenditures absent an actual Commission determination that the specific testing proposed in the *2012 NPRM* will be required. As discussed above, however, Service Electric is committed to continue its current practices of monitoring and testing its digital signals in response to known or reported signal quality issues.

¹⁸ *RCN Corporation*, 24 FCC Rcd at 12875.

¹⁹ *2012 NPRM*, 27 FCC Rcd at 9685, paras. 10 and 11.

CONCLUSION

For the reasons stated above, the Bureau should waive Sections 76.601, 76.605(a), and 76.1704 of the Commission's rules so that Service Electric can provide the benefits of all-digital technologies to its customers without incurring the needless expense of performing tests required by the Commission's rules for analog signals that will no longer be carried on its cable systems.

Respectfully submitted,

Service Electric Cablevision, Inc.



Gary S. Lutzker
BAKER & HOSTETLER LLP
1050 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20036
(202) 861-1500

Its Attorneys

November 12, 2013

Verification

To the best of my knowledge, information and belief formed after reasonable inquiry, this Petition for Waiver is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law, and it is not interposed for any improper purpose.



Gary S. Lutzker

November 12, 2013

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Service Electric Cablevision, Inc.

Petition for Waiver of Sections 76.601,
76.605(a), and 76.1704 of the Commission's
Rules

)
)
)
)
)

CSR - ____ - Z

To: The Secretary's Office
Attn: The Media Bureau

DECLARATION OF JAMES DORSA

1. My name is James Dorsa and I am Director of Engineering for Service Electric Cablevision, Inc.
2. I have read the foregoing Petition for Waiver and I am familiar with the contents thereof.
3. The facts contained herein and within the Petition are true and correct to the best of my knowledge, information, and belief.
4. I declare under penalty of perjury that the foregoing is true and correct.



James Dorsa
Director of Engineering
Service Electric Cablevision, Inc.
4949 Liberty Lane
Suite 400
Allentown, Pennsylvania 18106
610-432-2210

Executed On: November 8, 2013

EXHIBIT A

**SERVICE ELECTRIC CABLEVISION, INC. ALL-DIGITAL
CABLE SYSTEMS AND COMMUNITIES**

System	PSID #	Community	CUID #	Community Type		
BLOOMSBURG, PA	002781	BLOOMSBURG	PA0407	Incorporated Town		
		CATAWISSA	PA0956	Incorporated Township		
		CATAWISSA	PA0957	Incorporated Borough		
		SCOTT	PA0958	Incorporated Township		
		SOUTH CENTRE	PA0959	Incorporated Township		
		MONTOUR	PA0960	Incorporated Township		
		HEMLOCK	PA0962	Incorporated Township		
		ORANGE	PA0963	Incorporated Township		
		FRANKLIN	PA0964	Incorporated Township		
		MAIN	PA0965	Incorporated Township		
		LOCUST	PA1879	Incorporated Township		
		ROARING CREEK	PA3043	Incorporated Township		
		MOUNT PLEASANT	PA3044	Incorporated Township		
		CLEVELAND	PA3045	Incorporated Township		
		NORTH CENTER	PA3088	Incorporated Township		
		SHAMOKIN, PA	002781	RALPHO	PA0264	Incorporated Township
				FRANKLIN	PA0265	Incorporated Township
EAST CAMERON	PA0266			Unincorporated Area		
KULPMONT	PA0267			Incorporated Borough		
SHAMOKIN	PA0268			Incorporated Township		
SHAMOKIN	PA0269			Incorporated City		
SNYDERTOWN	PA0270			Incorporated Borough		
MOUNT CARMEL	PA0271			Incorporated Township		
WEST CAMERON	PA0272			Incorporated Township		
MARION HEIGHTS	PA0336			Incorporated Borough		
COAL	PA0548			Incorporated Township		
MOUNT CARMEL	PA0338			Incorporated Borough		
CONYNGHAM	PA0928			Incorporated Township		
HAZLETON, PA	001707	HAZLETON	PA0399	Incorporated City		
		WEST HAZLETON	PA0982	Incorporated Borough		
		CONYNGHAM	PA0983	Incorporated Borough		
		BANKS	PA0985	Incorporated Township		
		FOSTER	PA0986	Incorporated Township		
		KLINE	PA0988	Incorporated Township		
		MCADOO	PA0989	Incorporated Borough		
		FREELAND	PA0990	Incorporated Borough		
		BEAVER MEADOWS	PA0991	Incorporated Borough		
		SUGARLOAF	PA0992	Incorporated Township		

Exhibit A

Service Electric Cablevision, Inc. Systems and Communities

		BUTLER	PA0993	Incorporated Township
		HAZEL	PA0994	Incorporated Township
		JEDDO	PA2033	Incorporated Borough
		DORRANCE	PA3069	Incorporated Township
MAHANAY CITY, PA	001714	MAHANAY CITY	PA0482	Incorporated Borough
		ASHLAND	PA0056	Incorporated Borough
		GORDON	PA0444	Incorporated Borough
		RINGTOWN	PA0445	Incorporated Borough
		FRACKVILLE	PA0480	Incorporated Borough
		GIRARDVILLE	PA0481	Incorporated Borough
		ST CLAIR	PA0483	Incorporated Borough
		TAMAQUA	PA0484	Incorporated Borough
		GILBERTON	PA0732	Incorporated Borough
		MAHANAY	PA0733	Incorporated Township
		UNION	PA0797	Incorporated Township
		DELANO	PA0809	Incorporated Township
		RUSH	PA0831	Incorporated Township
		RYAN	PA0832	Incorporated Township
		NEW CASTLE	PA0833	Incorporated Township
		EAST NORWEGIAN	PA0834	Incorporated Township
		WEST MAHANAY	PA0835	Incorporated Township
		BUTLER	PA0836	Incorporated Township
		WEST PENN	PA0837	Incorporated Township
		NEW RINGGOLD	PA0838	Incorporated Borough
		WALKER	PA0839	Incorporated Township
		EAST BRUNSWICK	PA0841	Incorporated Township
		BARRY	PA0925	Incorporated Township
		CENTRALIA	PA0927	Incorporated Borough
		EAST CAMERON	PA0929	Incorporated Township
		NORWEGIAN	PA1327	Incorporated Township
		BLYTHE	PA1337	Incorporated Township
		SCHUYLKILL	PA1338	Incorporated Township
SUNBURY, PA	007617	SELINGSGROVE	PA0061	Incorporated Borough
		SUNBURY CITY	PA0062	Incorporated City
		ZERBE	PA0549	Incorporated Township
		NORTHUMBERLAND	PA0914	Incorporated Borough
		PENN	PA0976	Incorporated Township
		MONROE	PA0977	Incorporated Township
		ROCKEFELLER	PA0978	Incorporated Township
		UPPER AUGUSTA	PA0979	Incorporated Township
		SHAMOKIN DAM	PA0980	Incorporated Borough

Exhibit A

Service Electric Cablevision, Inc. Systems and Communities

		POINT	PA0981	Incorporated Township
		LITTLE MAHANOY	PA1032	Incorporated Township
		JORDAN	PA1033	Incorporated Township
		WASHINGTON	PA1034	Incorporated Township
		JACKSON	PA1035	Incorporated Township
		FREEBURG	PA1425	Incorporated Borough
		NEW BERLIN	PA1426	Incorporated Borough
		MIDDLEBURG	PA1442	Incorporated Borough
		MIDDLECREEK	PA1443	Incorporated Township
		LOWER MAHANOY	PA1500	Incorporated Township
		UPPER MAHANOY	PA1501	Incorporated Township
		CENTRE	PA1573	Incorporated Township
		JACKSON	PA2450	Incorporated Township
		BEAVER	PA2595	Incorporated Township
		BEAVERTOWN	PA2596	Incorporated Borough
		FRANKLIN TOWNSHIP	PA2597	Incorporated Township
		LIMESTONE TOWNSHIP	PA2598	Incorporated Township
		WASHINGTON	PA2602	Incorporated Township
		UNION	PA2879	Incorporated Township
		SPRING TOWNSHIP	PA3698	Incorporated Township
		HERNDON BOROUGH	PA3945	Incorporated Borough
BIRDSBORO, PA	001704	BIRDSBORO	PA0213	Incorporated Borough
		EXETER	PA0215	Incorporated Township
		ROBESON	PA0216	Incorporated Township
		FLEETWOOD	PA0282	Incorporated Borough
		RICHMOND	PA0283	Incorporated Township
		RUSCOMBMANOR	PA0284	Incorporated Township
		CUMRU	PA0972	Incorporated Township
		ST LAWRENCE	PA1030	Incorporated Borough
		MAIDENCREEK	PA1642	Incorporated Township
		UNION	PA1926	Incorporated Township
		AMITY	PA2175	Incorporated Township
		HONEY BROOK	PA2369	Incorporated Borough
		HONEY BROOK	PA2410	Incorporated Township
		EARL	PA2411	Incorporated Township
		CAERNARVON	PA2412	Incorporated Township
		ELVERSON	PA2624	Incorporated Borough
		KUTZTOWN	PA2666	Incorporated Borough
		LYONS STATION	PA2667	Incorporated Borough
		TOPTON	PA2668	Incorporated Borough
		MAXATAWNY	PA2669	Incorporated Township

Exhibit A

Service Electric Cablevision, Inc. Systems and Communities

		LONGSWAMP	PA2670	Incorporated Township
		ROCKLAND	PA2671	Incorporated Township
		BRECKNOCK	PA2760	Incorporated Township
		WARWICK	PA3062	Incorporated Township
		CAERNARVON	PA3073	Incorporated Township
		OLEY	PA3142	Incorporated Township
		DISTRICT	PA3253	Incorporated Township
		PIKE	PA3470	Incorporated Township
		EAST NANTMEAL	PA3696	Incorporated Township
DANVILLE, PA	005189	DANVILLE	PA0257	Incorporated Borough
		LEWISBURG	PA0353	Incorporated Borough
		MILTON	PA0388	Incorporated Borough
		WATSONTOWN	PA0611	Incorporated Borough
		WEST CHILLISQUAQUE	PA1016	Incorporated Township
		EAST BUFFALO	PA1061	Incorporated Township
		KELLY	PA1062	Incorporated Township
		UNION	PA1063	Incorporated Township
		BUFFALO	PA1064	Incorporated Township
		DELAWARE	PA1067	Incorporated Township
		LIMESTONE	PA1068	Incorporated Township
		WHITE DEER	PA1069	Incorporated Township
		LEWIS	PA1070	Incorporated Township
		TURBOTVILLE	PA1071	Incorporated Borough
		MCEWENSVILLE	PA1072	Incorporated Borough
		DERRY	PA1073	Incorporated Township
		POINT	PA1074	Incorporated Township
		MAHONING	PA1075	Incorporated Township
		LIBERTY	PA1076	Incorporated Township
		MONTOUR	PA1077	Incorporated Township
		COOPER	PA1078	Incorporated Township
		VALLEY	PA1079	Incorporated Township
		RIVERSIDE	PA1083	Incorporated Borough
		WASHINGTONVILLE	PA1084	Incorporated Borough
		EAST CHILLISQUAQUE	PA1089	Incorporated Township
		TURBOT	PA1090	Incorporated Township
		GREGG	PA2873	Incorporated Township
		KELLY	PA2901	Incorporated Township
		WHITE DEER	PA2902	Incorporated Township
		WEST HEMLOCK	PA3042	Incorporated Township

CERTIFICATE OF SERVICE

I, Sandra Dallas Jeter, a secretary at the law firm of Baker & Hostetler LLP, certify that on this 12th day of November 2013, I caused the foregoing Petition for Waiver to be served by First Class U.S. Mail, postage pre-paid, except where hand delivery is indicated, on the following:

William Lake*
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mary Beth Murphy*
Chief, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Steven A. Broeckaert*
Senior Deputy Chief, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Alison Neplokh*
Chief Engineer, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Room 4-A865
Washington, D.C. 20554

Alan Stillwell*
Deputy Chief, Office of Engineering and
Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Borough Of Birdsboro
113 East Main Street
Birdsboro, PA 19508

Amity Township
2004 Weavertown Road
P.O. Box 215
Douglassville, PA 19518

Township Of Caernarvon
3226 Main Street, P.O. Box 294
Morgantown, PA 19543

Brecknock Township
899 Alleghenyville Road
R.D. 3, Box 3286
Mohnton, PA 19540

Township Of Cumru
1775 Welsh Road
Mohnton, PA 19540

Township Of Caernarvon
2147 Main Street, Churchtown
Narvon, PA 17555

Township Of Earl
19 Schoolhouse Road
R.D. 3, Box 571
Boyertown, PA 19512

District Township
202 Weil Road
Boyertown, PA 19512

Borough Of Elverson
101 S. Chestnut Street
P.O. Box 206
Elverson, PA 19520

Township Of East Nantmeal
3383 Conestoga Road
Glenmoore, PA 19343

Borough Of Fleetwood
110 W. Arch Street
Fleetwood, PA 19522

Township Of Exeter
4975 DeMoss Road
P.O. Box 4068
Reading, PA 19606

Borough Of Honey Brook
71 Pequea Avenue
P.O. Box 249
Honey Brook, PA 19344

Borough Of Kutztown
45 Railroad Avenue
Kutztown, PA 19530-1112

Borough Of Lyons
316 S. Kemp Street
P.O. Box 230
Lyon Station, PA 19536

Maxatawny Township
663 Noble Street
Kutztown, PA 19530

Pike Township
812 Hill Church Road
R.D. 4, Box 247
Boyertown, PA 19512

Robeson Township
2689 Main Street
Birdsboro, PA 19508

Ruscombmanor Township
204 Oak Lane
Fleetwood, PA 19522

Borough Of Topton
205 Callowhill Street
Topton, PA 19536

Warwick Township
2500 Ridge Road
R.R. 1, Box 236
Elverson, PA 19520

Township Of Banks
c/o Mauch Chunk Trust Company
Attn: Wealth Mgmt.
P.O. Box 289
Jim Thorpe, PA 18229

Township Of Honey Brook
495 Suplee Road
Box 1281
Honey Brook, PA 19344

Longswamp Township
1112 State Street
Mertztown, PA 19539

Maidencreek Township
1 Quarry Road
P.O. Box 319
Blandon, PA 19510

Oley Township
1 Rose Virginia Road
Oley, PA 19547

Richmond Township
11 Kehl Drive
P.O. Box 474
Fleetwood, PA 19522

Rockland Township
41 Deysher Road
Fleetwood, PA 19522

St. Lawrence Borough
3400 St. Lawrence Avenue
Reading, PA 19606

Union Township
177 Center Road
Douglassville, PA 19518

Township Of Banks
72 Market Street, P.O. Box 231
Tresckow, PA 18254

Borough Of Beaver Meadows
100 East Broad Street
Beaver Meadows, PA 18216

Conyngam Borough
215 S. Main Street
P.O. Box 442
Conyngam, PA 18219-0442

Butler Township
415 W. Butler Drive
R.R. 3, Box 796B
Drums, PA 18222-9361

Dorrance Township
7844 Blue Ridge Trail
R.D. 4, Box 599
Mountaintop, PA 18707

Freeland Borough
801 Centre Street
P.O. Box 117
Freeland, PA 18224

City Of Hazleton
Hazleton City Hall
40 North Church Street
Hazleton, PA 18201

Kline Township
Municipal Building
76 S. Kennedy Drive
Kelayres, PA 18231

Sugarloaf Township
P.O. Box 61
154 North Main Street
Sybertsville, PA 18251

Town Of Bloomsburg
301 East Second Street
Bloomsburg, PA 17815

Catawissa Township
Catawissa Township Municipal Bldg.
153 Old Reading Road
R.D. 1, Box 319
Catawissa, PA 17820

Franklin Township
277 Long Woods Road
R.R. 2, Box 474
Catawissa, PA 17820

Township Of Foster
Municipal Bldg.
1000 Wyoming Ave., P. O. Box 465
Freeland, PA 18224

Hazle Township
Municipal Bldg.
1060 Peace Street
Hazleton, PA 18201

Borough Of Jeddo
R.R. 1, P.O. Box 1269
Freeland, PA 18224

Mcadoo Borough
23 North Hancock Street
McAdoo, PA 18237

Borough Of West Hazleton
Borough Building
12 South Fourth Street
West Hazleton, PA 18202

Catawissa Borough
307 Main Street
P.O. Box 44
Catawissa, PA 17820

Cleveland Township
45 Jefferson Road
R.D. 1
Elysburg, PA 17824

Hemlock Township
26 Firehall Road
Bloomsburg, PA 17815

Main Township
345 Church Road
R.D. 3
Bloomsburg, PA 17815

Locust Township
Municipal Building
1223A Numidia Drive
R.D. 3, Box 119A
Catawissa, PA 17820

Montour Township
Municipal Building
195 Rupert Drive
Bloomsburg, PA 17815

North Centre Township
277B Nursery Road
R.R. 2, Box 2605
Berwick, PA 18603

Roaring Creek Township
153 Old Reading Road
R.R. 1, Box 119
Catawissa, PA 17820

South Center Township
Municipal Building
6260 Fourth Street
Bloomsburg, PA 17815

Beavertown Borough
111 West Walnut Street
Beavertown, PA 17813

Franklin Township
1319 Paxtonville Road
Municipal Bldg., R.D. 1
Middleburg, PA 17842

Limestone Township
R. R. 3, Box 203
Mifflinburg, PA 17844

Middlecreek Township
R.D. 3
Middleburg, PA 17842

Washington Township
R.D. 3, Box 352
Middleburg, PA 17842

Mount Pleasant Township
230 McWilliams Road
R.D. 4
Bloomsburg, PA 17815

Orange Township
Municipal Building
2928 State Route 487
R.D. 2, Box 100A
Orangeville, PA 17859

Scott Township
Municipal Building
350 Tenny Street
Bloomsburg, PA 17815

Beaver Township
2968 Creek Road
R.R. 1, Box 1864
Beavertown, PA 17813

Centre Township
3652 New Berlin Hwy
Middleburg, PA 17841

Freeburg Borough
P.O. Box 196
Freeburg, PA 17827

Middleburg Borough
13 North Main
Middleburg, PA 17842

New Berlin Borough
P.O. Box 330
New Berlin, PA 17855

Coal Township
805 West Lynn Street
Coal Township, PA 17866

East Cameron Township
5343 Upper Road (Township Bldg.)
R.R. 1, P.O. Box 1248
Shamokin, PA 17872

Conyngam Township
298 Smith Street
P.O. Box 10
Wilburton, PA 17888

Franklin Township
277 Long Woods Road
R.R. 2, Box 474
Catawissa, PA 17820

Marion Heights Borough
224-226 East North Street
Marion Heights, PA 17832

Mount Carmel Township
300 Laurel Street
P.O. Box 388
Mt. Carmel, PA 17851

Shamokin, City Of
P. O. Box Q, 47 East Lincoln Street
Shamokin, PA 17872

Snydertown Borough
42 South Market Street
General Delivery
Snydertown, PA 17877

Herndon Borough
North Main Street
Herndon, PA 17830

Jackson Township
R.D. 1, Box 339
Winfield, PA 17889

Little Mahanoy Township
R.R. 1, P.O. Box 116
Dornsife, PA 17823'

Lower Mahanoy Township
Supervisors Building
HC68 Box 44
Dalmatia, PA 17017

Northumberland Borough
175 Orange Street
Northumberland, PA 17857

Kulpmont Borough
860 Spruce Street
Kulpmont, PA 17834

Mount Carmel Borough
137 West Fourth Street
Mt. Carmel, PA 17851

Ralpho Township
206 S. Market Street, Suite 1
Elysburg, PA 17824-0162

Shamokin Township
649 Seven Points Road
R.R. 4, Box 204A1
Sunbury, PA 17801

West Cameron Township
R.R. 2, Box 583
Shamokin, PA 17872

Jackson Township
145 Jackson Twp. Rd.
R.R. 1, Box 605
Herndon, PA 17830

Jordan Township
444 Jordan Twp. Road
R.R. 1, Box 1392
Herndon, PA 17830

Lower Augusta Township
609 Hallowing Run Road
Sunbury, PA 17801

Monroe Township
39 Municipal Drive
R.D. 5, Box 123
Selinsgrove, PA 17870

Penn Township
Municipal Building
228 Clifford Road
Selinsgrove, PA 17870

Rockefeller Township
538 Seven Points Road
R.R. 4, Box 257-B
Sunbury, PA 17801

Point Township
Municipal Building
759 Ridge Road
Northumberland, PA 17857

Selinsgrove Borough
1 North High Street
Selinsgrove, PA 17870-1537

Spring Township
80 Railroad Avenue
Beaver Springs, PA 17812

Union Township
70 Municipal Lane
P.O. Box 184
Winfield, PA 17889

Upper Mahanoy Township
2968 Line Mt. Road
Dornsife, PA 17823

Zerbe Township
800 Mahanoy Street
Trevorton, PA 17881

Barry Township
868 Deep Creek Rd
Ashland, PA 17921

Delano Township
1 Hazle St
Delano, PA 17921

East Brunswick Township
55 Catawissa St
New Ringgold, PA 17960

Borough Of Gilberton
2710 Main St
Mahanoy Plane, PA 17949

Borough Of Gordon
Plane & Otto Streets
Gordon, PA 17935

Mahanoy Township
1001 W. Centre St
Mahanoy City, PA 17948

Shamokin Dam Borough
P.O. Box 273
Shamokin Dam, PA 17876

City Of Sunbury
225 Market Street
Sunbury, PA 17801

Upper Augusta Township
Municipal Building
R.D. 2, 2087 Snydertown Road
Sunbury, PA 17801

Washington Township
P.O. Box 11
398 Brier School Road
Rebuck, PA 17867

Borough Of Ashland
401 S. 18th St
Ashland, PA 17921

Butler Township
211 Broad St
Ashland, PA 17921

East Norwegian Township
593 Port Carbon Saint Clair Hwy
Pottsville, PA 17901

Borough Of Frackville
42 S. Center St
Frackville, PA 17931

Borough Of Girardville
99 Julia St
Girardville, PA 17935

Borough Of Mahanoy City
1400 W. South St
Mahanoy City, PA 17948

Township Of New Castle
R.D. 2
New Castle, PA

Borough Of Ringtown
31 S. Center St
Ringtown, PA 17967

Borough Of New Ringgold
112 S Railroad St
New Ringgold, PA 17960

Rush Township
2 Sibilia Way
Tamaqua, PA 18252

Borough Of St. Clair
16 S. Third St.
St. Clair, PA 17970

Union Township
113 Zion Grove Rd.
Ringtown, PA 17967

Township Of West Penn
27 Municipal Road
New Ringgold, PA 17960

Buffalo Township
2115 Strickler Road
Mifflinburg, PA 17844

Danville Borough
239 Mill Street
Danville, PA 17821

Derry Township
109 Shed Road
Danville, PA 17821

East Chillisquaque Township
1110 Mexico Road
Milton, PA 17847

Kelly Township
551 Zeigler Road
Lewisburg, PA 17837

Lewisburg Borough
55 S. 5th Street
Lewisburg, PA 17837

Limestone Township
Limestone Road
Milton, PA 17847

McEwensville Borough
2578 Susquehanna Trail
PO Box 1
McEwensville, PA 17749

Ryan Township
36 N. 5th Ave
Barnesville, PA 18214

Borough Of Tamaqua
320 East Broad St.
Tamaqua, PA 18252

West Mahanoy Township
190 Pennsylvania Avenue
Shenandoah Heights, PA 17976

Township Of Walker
9 Township Rd
Tamaqua, PA 18252

Cooper Township
19 Steltz Road
Danville, PA 17821

Delaware Township
1960 8th Street Drive
Watsontown, PA 17777

East Buffalo Township
568 Fairground Road
Lewisburg, PA 17837

Gregg Township
18084 Russell Road
Allenwood, PA 17810

Lewis Township
1428 Rovendale Drive
Watsontown, PA 17777

Liberty Township
197 Mooresburg Road
Danville, PA 17821

Mahoning Township
1101 Bloom Road
Danville, PA 17821

Milton Borough
2 Filbert Street
PO Box 150
Milton, PA 17847

Point Township
759 Ridge Road
Northumberland, PA 17857

Montour Township
195 Rupert Drive
Bloomsburg, PA 17857

Riverside Borough
301 Dewart Street
PO Box 307
Riverside, PA 17868

Turbotville Borough
2 Adam Street
PO Box 264
Turbotville, PA 17772

Valley Township
5 Indian Run Road
Danville, PA 17821

Washingtonville Borough
PO Box 127
Washingtonville, PA 17884

West Hemlock Township
569 Columbia Hill Road
Danville, PA 17821

Blythe Township
Municipal Building
New Philadelphia Road
Kaska, PA 17959

Turbot Township
323 Ridge Road
Milton, PA 17847

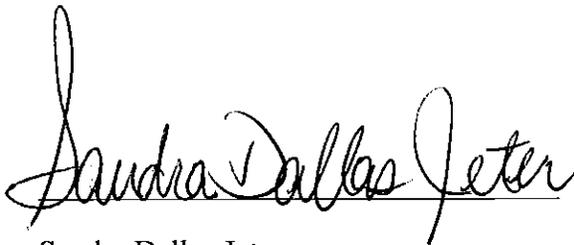
West Chillisquaque Township
PO Box 242
Montandon, PA 17850

Watsontown Borough
Fourth & Main Streets
PO Box 273
Watsontown, PA 1777

White Deer Township
2191 Creek Road
New Columbia, PA 17856

Norwegian Township
506 Maple Avenue
Mar Lin, PA 17951

Schuylkill Township
75 Walnut Street
P.O. Box 405
Mary, PA 17952



Sandra Dallas Jeter

* Hand Delivery