

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

In the Matter of

Connect America Fund

Universal Service Reform – Mobility Fund

ETC Annual Reports and Certifications

Establishing Just and Reasonable Rates for Local
Exchange Carriers

Developing an Unified Intercarrier Compensation
Regime

WC Docket No. 10-90

WT Docket No. 10-208

WC Docket No. 14-58

WC Docket No. 07-135

CC Docket No. 01-92

**REPLY COMMENTS OF
THE MASSACHUSETTS DEPARTMENT OF
TELECOMMUNICATIONS AND CABLE**

Commonwealth of Massachusetts
Department of Telecommunications and Cable

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The Massachusetts Department of Telecommunications and Cable (“MDTC”)¹ respectfully submits these reply comments responding to the multiple Orders and Further Notice of Proposed Rulemaking (“FNPRM”) released by the Federal Communications Commission (“FCC” or “Commission”) on June 10, 2014, and comments filed on August 8, 2014, in the above-referenced dockets.² Through the FNPRM, the FCC seeks comment on a number of discrete issues “to update and implement further” certain reforms adopted by the FCC beginning in 2011 involving the high-cost and Connect America Fund (“CAF”).³ The MDTC urges the FCC to maintain the cooperative federalism inherent in the universal service statutory

¹ The MDTC regulates telecommunications and cable services within Massachusetts and represents the Commonwealth before the FCC. MASS. GEN. LAWS ch. 25C, § 1; GEN. LAWS ch. 166A, § 16.

² *In re Connect America Fund; Universal Service Reform – Mobility Fund; ETC Annual Reports and Certifications; Establishing Just and Reasonable Rates for Local Exchange Carriers; Developing an Unified Intercarrier Compensation Regime*, WC Docket No. 10-90 *et al.*, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54 (rel. Jun. 10, 2014) (“*Multi-Order/FNPRM*”). The MDTC’s silence on any particular issue presented by the FCC should not be construed as rejection or support of that issue.

³ *Multi-Order/FNPRM*, ¶ 10.

framework, especially regarding eligible telecommunications carrier (“ETC”) designations and relinquishment.⁴ The MDTC believes that: (1) setting timelines for state commission action burdens a state’s ability to combat waste, fraud, and abuse; (2) interpretation of state laws involving questions of jurisdiction requires state commission input; and (3) automatically sunseting ETC designations may jeopardize continuity of service to consumers.

I. DISCUSSION

The FCC contemplates imposing timelines for state action on CAF Phase II ETC designations and interpreting state laws in order to assert FCC jurisdiction over certain ETC designations.⁵ The FCC also contemplates sunseting ETC designations after the expiration of CAF funding terms and, further, asks whether to carry over Lifeline-related obligations in certain instances.⁶ In all instances, the FCC should carry over Lifeline obligations and retain the existing guidance in Sections 214(e) and 254.⁷

The preservation and advancement of universal service has long been a partnership between States and the federal government.⁸ The MDTC believes that this cooperative federalism inherent in the universal service statutory framework is valuable and should be

⁴ The MDTC designates and oversees ETCs operating in Massachusetts. *See Investigation by the Dep’t of Telecomms. & Energy on its own motion concerning (1) designation of eligible telecomms. carriers, pursuant to § 102 of the Telecomms. Act of 1996; (2) participation in the FCC’s modified Lifeline program and acceptance of increased fed. funding, pursuant to 47 C.F.R. Part 54 §§ 54.400-54.417 et seq.; & (3) participation in the FCC’s program for discounted intrastate rates for telecomm. servs. for rural health care providers, pursuant to § 254(h) of the Telecomm. Act of 1996*, MDTE Docket No. 97-103, Order Opening Investigation (Dec. 8, 1997), at 6 (asserting jurisdiction over ETCs operating in Massachusetts and directing entities to submit designation requests to the MDTC’s predecessor); *Investigation by the Dep’t on its Own Motion into the Implementation in Mass. of the FCC’s Order Reforming the Lifeline Program*, MDTC Docket No. 13-4, Order Implementing Requirements and Further Request for Comment (Aug. 1, 2014) (“*MDTC Lifeline Reform Order*”), at 3-22 (streamlining certain Lifeline requirements imposed on ETCs operating in Massachusetts).

⁵ *See Multi-Order/FNPRM*, ¶¶ 179-183.

⁶ *See id.*, ¶¶ 184-185, 195-198.

⁷ 47 U.S.C. §§ 214(e), 254.

⁸ *See In re Universal Serv. Contribution Methodology et al.*, WC Docket No. 06-122, GN Docket No. 09-51, Further Notice of Proposed Rulemaking (rel. Apr. 30, 2012) (“*Contributions FNPRM*”), ¶ 6; *Contributions FNPRM*, Universal Serv. Joint Bd. State Member Reply Comments (Aug. 6, 2012) (“*State Member Joint Board Comments*”), at 2.

maintained.⁹ Congress and the FCC acknowledged a formal continuation of this partnership with the passage of Section 254 of the 1996 Telecommunications Act.¹⁰ Section 254 establishes the basic federal principles and requirements for universal service, including the mandate that only ETCs designated under Section 214(e) “shall be able to receive specific Federal universal service support.”¹¹ Section 214(e) sets out ETC designation and relinquishment requirements.¹² Prominent in these requirements is that States retain primary jurisdiction over these determinations where they assert jurisdiction and that States “may adopt regulations not inconsistent with the Commission’s rules to preserve and advance universal service.”¹³ As conveyed by the State Members of the Federal-State Joint Board on Universal Service, States continue to have “strong and unwavering [...] interests in a universal service partnership with the Commission” and “cooperation between the Commission and the States continues to be essential

⁹ See, e.g., Nat’l Assoc. of Reg. Comm’rs (“NARUC”), *NARUC Federalism Task Force Report: Cooperative Federalism and Telecom In the 21st Century* (“NARUC Cooperative Federalism Report”), at 7, 13 (Nov. 2013) (discussing why, “[d]espite changing State statutes, the transition to IP-enabled networks, and emerging communications offerings, cooperative federalism remains the most appropriate model for communications oversight in the 21st century” as it relates to universal service and other matters).

¹⁰ Codified at 47 U.S.C. § 254. See also *In re Fed.-State Joint Bd. on Universal Serv.*, CC Docket No. 96-45, Report and Order, FCC 97-157 (rel. May 8, 1997) (subsequent history omitted), ¶ 818 (indicating that “[w]e fully appreciate and support the continuation of the historical informal partnership between the states and the Commission in preserving and advancing the universal service support mechanisms envisioned by section 254. Indeed, we believe that section 254 envisions the continuation of this partnership”).

¹¹ 47 U.S.C. § 254(e). See also 47 U.S.C. § 214(e).

¹² 47 U.S.C. §§ 214(e)(2)-(6).

¹³ 47 U.S.C. §§ 214(e)(2)-(6), 254(f). See also *Multi-Order/FNPRM*, ¶¶ 40, 179 (acknowledging that “Section 214(e)(2) gives states the primary responsibility for ETC designation”); *In re Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”) (subsequent history omitted), ¶ 65 (permitting states to adopt program or income eligibility criteria in addition to the baseline eligibility requirements for the Lifeline program established by the FCC); *Multi-Order/FNPRM*, Rural Ass’ns Comments (Aug. 8, 2014) (“Rural Associations Comments”), at 61-62 (urging the FCC to “not modify or curtail state commission oversight of the ETC process – a responsibility assigned to the states by the Act itself” if states do not initiate or conclude a proceeding within a certain time period), citing 47 U.S.C. § 214(e)(2); MDTC Comments, *In re Fed.-State Joint Bd. on Universal Serv. et al.*, CC Docket No. 96-45 (Aug. 21, 2008) (“MDTC ETC Petition Comments”), at 3 (under Section 214, “the MDTC has primary jurisdiction to decide if a CMRS provider is an ETC”).

in implementing universal service reforms.”¹⁴ If adopted, the FCC’s ETC-related proposals may undermine States’ role in federal universal service policy and oversight.

A. Imposing Timelines on State Commission Action Burdens State Commission Ability to Combat Waste, Fraud, and Abuse.

The FCC proposes adopting “a rebuttable presumption that a state commission lacks jurisdiction over an ETC designation petition for purposes of [CAF] Phase II competitive bidding or Remote Areas Fund if it fails to initiate a proceeding on that petition within 60 days of receiving it” and seeks comment on whether to adopt “a similar rebuttable presumption if a state commission fails to decide a petition within a certain period of time, such as 90 days of initiating a proceeding on it.”¹⁵ If the FCC imposes these timelines on state action, it would burden states’ ability to combat waste, fraud, and abuse through existing designation processes used by state commissions like the MDTC.¹⁶

In accordance with the adjudicatory proceeding requirements of the Massachusetts Administrative Procedure Act, the MDTC conducts in-depth evidentiary proceedings involving discovery, legal briefs, and public and evidentiary hearings in its ETC designation process.¹⁷

¹⁴ State Member Joint Board Comments at 3. *See also NARUC Cooperative Federalism Report* at 13 (urging that “States should retain a prominent role in all decisions related to USF”).

¹⁵ *Multi-Order/FNPRM*, ¶ 182.

¹⁶ *See MDTC Comments, In re Tech. Transitions et al.*, GN Docket No. 13-5 *et al.* (Mar. 31, 2014) (“MDTC CAF Experiment Comments”), at 3-5; Rural Associations Comments at 60-63 (arguing that “ETC designation and ongoing oversight is the only means of ensuring proper accountability in the use of USF support; the Commission should accordingly reject calls of those seeking to evade altogether or escape as soon as possible such accountability”). Further, unlike other, unrelated statutory provisions, nothing in Section 214(e) specifies or implies that the asserting authority (state commissions or the FCC) must act within a specified time period on ETC-related petitions. MDTC CAF Experiment Comments at 4. For instance, Congress clearly defined a 90-day period for state commencement of action relating to interconnection agreements and final action “within a reasonable period of time” after a wireless siting application is filed. *See* 47 U.S.C. §§ 252(e)(5) and § 332(c)(7)(B)(ii). The FCC determined that the phrase “reasonable period of time” is presumptively (but a rebuttable) 90 days to process an application to place a new antenna on an existing tower and 150 days to process all other applications. *See In re Petition for Declaratory Ruling to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review and to Preempt Under Section 253 State and Local Ordinances that Classify All Wireless Siting Proposals as Requiring a Variance*, WT Docket No. 08-165, Declaratory Ruling, FCC 09-99 (rel. Nov. 18, 2009), ¶¶ 4, 32 (subsequent history omitted).

¹⁷ *See* MASS. GEN. LAWS c. 30A, §§ 10, 11, 12. Most docketed proceedings conducted by the MDTC are adjudicatory.

The MDTC's designation process enables it to determine whether an applicant complies with federal and state laws; is technically and financially capable of providing service as an ETC;¹⁸ and for which approval is in the public interest consistent with Section 214.¹⁹ At a minimum, this process may take *at least* one year to complete.²⁰ Timing is affected by the availability of staff resources; the MDTC's docket and other agency duties; and other matters arising during the course of the proceeding, including issues that arise from FCC rule-making,²¹ intervention requests and oppositions, motion practice, discovery, and corresponding appeals.²²

The MDTC agrees that there is value in moving forward on CAF Phase II competitive bidding considerations but urges an approach that incorporates state ETC processes. State commissions have a vested interest in receiving CAF funding and beneficial projects and will proceed apace on ETC applications. Like the FCC, the MDTC strives to act in the best interests

¹⁸ The FCC determines, in part, that it will not require ETC designations prior to the competitive bidding process “to ensure that only financially and technically qualified providers participate in the competitive bidding process [...] acknowledge[ing] the possibility that in some cases a winning bidder may not meet the requirement for designation as an ETC[.]” *Multi-Order/FNPRM*, ¶ 44.

¹⁹ See, e.g., *Application of BLC Mgmt., LLC d/b/a Angles Commc'n Solutions for Certification as an Eligible Telecomms. Carrier*, MDTC Docket No. 09-2, Order (Aug. 23, 2010), at 1, 19 (denying the entity's petition for designation as an ETC); *Petition for Limited Designation as an Eligible Telecomms. Carrier for Purposes of Low Income Support Only*, MDTC Docket No. 12-4, Order Approving Petition (Aug. 30, 2012), at 2, 25 (granting entity's petition for designation as an ETC). The Department recently streamlined and unified its Lifeline-related reporting and consumer protection requirements. See generally *MDTC Lifeline Reform Order*.

²⁰ Cable rate cases are instructive. The MDTC may take up to 12 months to issue a cable rate order from the date an operator filed for a rate adjustment in those communities subject to regulation. See 47 C.F.R. § 76.933(g)(2). The MDTC conducts formal rate proceedings on cable operator rate filings annually and often takes the full 12 months to complete the proceedings and issue an Order. Although technical and complicated in nature, cable rate proceedings do not incorporate the level of review required in ETC designation proceedings. Unlike petitioners in recent ETC proceedings, cable providers have been providing longstanding service to consumers and have had a long-term presence in the state. In contrast, as the Rural Associations observe, “to the extent any ETC is a relatively new entity just recently formed to seek out and secure universal service dollars, the state may have legitimate, complex questions about the entity's financial, managerial, and technical capability to provide *sustainable* voice and broadband services that meet the Commission's (and the state's own) expectations with respect to reasonable price and service quality to consumers[.]” Rural Associations Comments at 62. These questions are unlikely to be resolved in three months.

²¹ For instance, shortly after the FCC mandated its Compliance Plan approval requirements, the MDTC dismissed several ETC petitions pending before it without prejudice. See, e.g., *Petition of Aegis Telecom, Inc. d/b/a Off the Hook Telecom for Limited Designation as an Eligible Telecomms. Carrier*, MDTC Docket No. 11-5, Order of Dismissal Without Prejudice (Mar. 1, 2012) (dismissing the company's ETC petition and permitting a re-filing only after the FCC approved the company's Compliance Plan).

²² The California Public Utilities Commission (“CPUC”) raises similar concerns. See *Multi-Order/FNPRM*, CPUC Comments (Aug. 8, 2014) (“CPUC Comments”), at 6-8.

of all stakeholders that it represents. Rather than imposing timelines for state action, the MDTC urges the FCC to focus on ensuring a measured transition between CAF funding mechanisms (Phase I to Phase II right-of-first refusal to Phase II competitive bidding) and tie the timing of state commission adjudication of ETC applications to particular funding years.

B. FCC Interpretation of State Laws Involving Questions of Jurisdiction Requires State Commission Input.

In the FNPRM, the FCC states that, “[i]f a state has a law expressly stating that it does not have jurisdiction over a relevant type of technology, Commission staff would consider such a statute relevant in its determination of Commission jurisdiction.”²³ This approach may unintentionally invite forum-shopping for companies seeking ETC designation. The MDTC submits that state input regarding jurisdiction should be considered by the FCC. Indeed, the FCC has a process in place for federal ETC applicants to include relevant state commission orders or statements on jurisdiction with their applications, and the MDTC urges the FCC to keep this process.²⁴ According to the FCC:

While a carrier may believe state law to preclude the state commission from exercising jurisdiction over the carrier for purposes of designation under section 214(e)(2), we conclude, as a matter of federal-state comity, that the carrier should first consult with the state commission to give the state commission an opportunity to interpret state law [...] Each carrier should consult with the state commission to receive such a notification, rather than relying on notifications that may have been provided to similarly situated carriers.²⁵

The FCC should retain its existing process to preserve federal-state comity and include the requirements that: (1) applicants submit copies of their applications to the relevant state

²³ *Multi-Order/FNPRM*, ¶ 183.

²⁴ *See In re Fed.-State Joint Bd. on Universal Serv. et al.*, CC Docket No. 96-45, *Twelfth Report & Order, Memorandum Opinion & Order, & Further Notice of Proposed Rulemaking*, FCC 00-208 (rel. Jun. 30, 2000) (“*USF Twelfth Report & Order*”), ¶¶ 112-114; *In re Telecomms. Carriers Eligible for Universal Serv. Support et al.*, WC Docket No. 09-197, Order, DA 12-934 (rel. Jun. 13, 2012), ¶ 12 (specifying that in order for the FCC to assert jurisdiction, ETC petitioners must provide a brief statement of supporting facts “and certification from each of the relevant state commissions providing that the state commission lacks jurisdiction to perform the requested ETC designation”).

²⁵ *USF Twelfth Report & Order*, ¶¶ 112-113.

commission(s) at the same time they file their federal ETC designation application with the FCC, giving state commissions notice and providing them an opportunity to comment and/or object; and (2) accompanying copies of state commission orders or affirmative statements be dated for not more than one year prior to the initial application date, as state laws may change.²⁶ This will ensure state commissions receive timely notice of petitions affecting their states that are pending at the FCC and that applicants do not rely on outdated state commission orders or affirmative statements in the supporting materials submitted to the FCC.

The FCC should give state commissions the opportunity to interpret their own jurisdictional authority, especially as the FCC contemplates permitting non-traditional and IP-enabled service providers to seek ETC designations and receive CAF support.²⁷ In recent years, many states have enacted new laws limiting the regulation of voice-over IP (“VoIP”) or IP-enabled services.²⁸ However, many state commissions may not yet have needed or had the opportunity to resolve the question as to how those provisions apply within the purview of the broader state statutory and regulatory framework, especially in relation to universal service. Giving a state commission the opportunity to interpret its own laws would reduce the administrative burden on the FCC.

C. Automatically Sunsetting ETC Designations May Jeopardize Continuity of Service to Consumers.

The FCC contemplates sunsetting CAF Phase II competitive bidding ETC designations “after the funding term has expired and the entity has fulfilled its build-out and public interest

²⁶ The MDTC knows of at least one instance where a carrier failed to seek an appropriate affirmative statement from our agency before the carrier withdrew its ETC petition with the FCC. See MDTC ETC Petition Comments at 5-6; MDTC Motion for Extension of Time, *In re Fed.-State Joint Bd. on Universal Serv. et al.*, CC Docket No. 96-45 (Jul. 31, 2008), at 1. Instead, the carrier relied on outdated Order issued by the MDTC’s predecessor.

²⁷ See *Multi-Order/FNPRM*, ¶ 41. See also *In re Tech. Transitions et al.*, GN Docket No. 13-5 *et al.*, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014), ¶¶ 90-91, 116, 121-122.

²⁸ See generally, Sherry Lichtenberg, Ph.D, Nat’l Reg. Research Inst., *Telecomms Legislation 2014: Completing the Process*, Rep. No. 1407 (Jun. 2014) (summarizing recent and pending state legislative changes and regulatory actions).

obligations” and whether such an approach “is consistent with the Act.”²⁹ The FCC also seeks to further develop the record on how to apply the Section 214 framework “to situations where an incumbent LEC ETC no longer receives high-cost universal service support for a given geographic area or where a non-incumbent carrier has been selected for support through the competitive bidding process.”³⁰ The FCC recognizes that incumbent ETCs that no longer receive high-cost support “would effectively become Lifeline-only ETCs” and subject to ETC relinquishment procedures.³¹ However, the adoption of an automatic sunset of ETC designations may jeopardize continuity of service to consumers and the MDTC urges against this approach.

The MDTC shares the California Public Utilities Commission’s concern that, “having a predetermined sunset date for expiration of [an] ETC designation and the attendant obligations and responsibilities may jeopardize continuity of service in the area” as service areas between CAF mechanisms do not align and the area may not be served by a competing provider.³² Federal law mandates this “continuity of service”.³³ If a carrier wishes to relinquish its ETC designation, Section 214(e)(4) establishes a clear process to follow.³⁴ That is, the asserting authority (the state commission or the FCC) must approve a carrier’s request to relinquish its ETC designation in any area served by more than one ETC, as long as the requesting ETC

²⁹ *Multi-Order/FNPRM*, ¶ 184.

³⁰ *Id.*, ¶ 196.

³¹ *Id.*, ¶ 197.

³² CPUC Comments at 9. *Contrast Multi-Order/FNPRM*, United States Telecom Comments (Aug. 8, 2014), at 21-24 (arguing that Section 214 “relieves a provider of its ETC obligations in areas where it no longer receives support”); *Multi-Order/FNPRM*, CenturyLink Comments (Aug. 8, 2014), at 22 (specifying that “a carrier’s ETC designation should end when its support ends, regardless of the particular form of support the carrier previously received”). These carriers and others fail to observe that, for many years, the *only* high-cost support received by price cap ETCs in certain service areas was not used for the advancement of universal service, nor was it subject to certain universal service certification requirements like other high-cost mechanisms. The carriers could have rejected this support at any time and were effectively Lifeline-only ETCs for over a decade. This mechanism, Interstate Access Support, is now a part of the “frozen” support under CAF Phase I, and recipients of this support must now comply with actual universal service obligations, in addition to their longstanding Lifeline requirements.

³³ 47 U.S.C. § 214(e)(4).

³⁴ *Id.* See also CPUC Comments at 9.

provides appropriate notice and the asserting authority can ensure continuity of service to consumers by the ETC(s) remaining in the area.³⁵ Setting an automatic sunset date for ETC designations fails to provide asserting authorities adequate notice and ability to ensure substitution of comparable services in the affected areas and potentially stranding consumers without service.

Further, all ETCs should retain their Lifeline obligations in the wake of CAF Phase II and beyond and be subject to the statutory relinquishment requirement. Lifeline obligations preceded the 1996 Act; were mandatory for high-cost ETCs; and continue to be required for CAF recipients. If high-cost ETCs remain subject to existing ETC relinquishment procedures for purposes of Lifeline, then a similar consideration should extend to CAF ETCs. This will ensure consistency for carriers and continuity of service for the especially vulnerable, low-income consumers.

Rather than automatically sunsetting designations, the MDTC urges the FCC to establish clear guidelines to consider in an ETC relinquishment process. In addition to continuity of service, state commissions and the FCC should consider whether an ETC has satisfied its obligations before granting an ETC relinquishment request. This will ensure a final level of carrier accountability over the expenditure of universal service funds. Due to recent reforms in the Lifeline program, additional considerations should include whether an ETC is facilities-based or a reseller, and whether wireless voice service is an effective substitute for wireline voice service, especially throughout geographic areas without reliable wireless coverage.³⁶

³⁵ 47 U.S.C. § 214(e)(4).

³⁶ See *Lifeline Reform Order*, ¶ 21 (discussing wireless Lifeline enrollment rates) and ¶ 368 (forbearing from the facilities requirement of Section 214(e)(1)(A) “to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program”).

II. CONCLUSION

If adopted, the FCC's ETC-related proposals could undermine the states' historic role in federal universal service policy and oversight. The MDTC urges the FCC to support the cooperative federalism inherent in the universal service statutory framework, especially regarding ETC designations and relinquishment. In particular: (1) the FCC should not impose timelines on state commission action, because it unduly burdens state commission ability to combat waste, fraud, and abuse; (2) interpretations of state laws require state commission input; and (3) automatically sunseting ETC designations may jeopardize continuity of service to consumers.

Respectfully submitted,

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