

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

GLOBAL CONNECTION INC. OF AMERICA)	
PETITION FOR DESIGNATION AS A WIRELINE,)	CASE NO.
ELIGIBLE TELECOMMUNICATIONS CARRIER IN)	2016-00363
THE STATE OF KENTUCKY)	

ORDER

On July 28, 2014, Global Connection Inc. of America (“Global Connection”), a reseller of wireline service, also known as a Competitive Local Exchange Carrier, filed an application under 47 U.S.C. § 214(e)(2) seeking designation as an Eligible Telecommunications Carrier (“ETC”). Global Connection seeks to receive federal and state low-income Universal Service Fund (“USF”) support for wireline services.¹ Global Connection seeks ETC designation only for the purpose of participation in the Lifeline program. Global Connection does not seek high-cost support.

The application states that: (1) Global Connection meets all the requirements for designation as an ETC to serve the designated areas in the state of Kentucky;² (2) Global Connection requests designation in the underlying carrier’s licensed service areas in Kentucky;³ (3) in accordance with 47 U.S.C. § 214(e)(2), Global Connection seeks to be designated as an ETC solely to provide Lifeline service to qualifying

¹ Global Connection requests ETC designation throughout the incumbent carriers of BellSouth Telecommunications, LLC dba AT&T Kentucky (“AT&T Kentucky”) and Windstream Kentucky East, LLC and Windstream Kentucky West, LLC, (“Collectively Windstream”) service territories, Application at 1 and Exhibit A.

² Application at 1–2, 10–20.

³ *Id.* at 15–16.

customers in Kentucky;⁴ and (4) designation of Global Connection as an ETC for the designated areas served in Kentucky will serve the public interest.⁵

Global Connection is an established wireline carrier, operating in over two dozen states, including Kentucky, and is already designated as a wireline ETC in nine states and as a wireless ETC in 24 jurisdictions.⁶ The Commission designated Global Connection as a wireless ETC effective August 7, 2013, in Case No. 2013-00051.⁷

Global Connection is also operating in Kentucky as a wireline telecommunications provider and has the operational framework in place for provision of Lifeline services. Global Connection has been providing wireline Lifeline services in Kentucky for years through resale of the already-discounted Lifeline services of AT&T, but has not directly sought reimbursement from the federal or state universal service funds. Global Connection increased its Kentucky Lifeline and non-Lifeline customer base this past year with the acquisition of additional customers from Budget Prepay, Inc. Effective August 15, 2016, pursuant to a recent FCC decision, however, this Lifeline-through-resale arrangement ceased to be available.⁸ Consequently, Global Connection desires to obtain designation from the Commission in order to re-enter the Lifeline sector as soon as possible. Global Connection states that it plans to offer low-

⁴ *Id.* at 1.

⁵ *Id.* at 21-22.

⁶ *Id.* at 2.

⁷ Case No. 2013-00051, *Application of Global Connection Inc. of America dba Stand Up Wireless for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky*, (Ky. PSC Aug. 7, 2013).

⁸ See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect American Fund*, WC Docket Nos. 11-42, 09-197, 10-90, *Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order*, FCC 15-71, 244, 249 (2015) (2015 Lifeline Second Report and Order) (limiting reimbursement through the federal Lifeline fund to carriers that directly serve the end user Lifeline subscribers).

income Kentucky consumers a valuable alternative choice of Lifeline provider, in particular by offering the increasingly rare option of wireline Lifeline services.

Global Connection will require customers to choose a plan upon enrollment. Customers may enroll by calling Global Connection's customer service center, by visiting its website, or in person at locations such as such as convenience and check-cashing stores. Global Connection currently has 13 such locations for enrollment in Kentucky, as well as more than 117 locations at Kentucky Kroger and Ace Cash Express stores that accept customer payments. Customers who enroll by phone are sent an application or certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers enrolling online must complete, print and sign an application for return by electronic mail, fax, or U.S. mail, along with a copy of the prospective customer's proof of eligibility.⁹

The Commission requires that the Kentucky Universal Service support and the Kentucky Telecommunications Relay Service and Telecommunications Access Program support be collected for each wireline customer. Global Connection states that it will pay applicable federal, state, and local regulatory fees, including 911/E911 fees imposed on customers.¹⁰ Global Connection states it will not collect service deposits for its plans and will not charge a number-portability fee for Lifeline accounts.¹¹ Global Connection will provide, at no charge, toll-limitation services for any plan that is not

⁹ *Id.* at 16.

¹⁰ *Id.* at 17.

¹¹ *Id.*

prepaid or which will potentially apply additional charges for long distance calling.¹²

Discussion

Pursuant to 47 U.S.C. § 254(e), “only an eligible telecommunications carrier designated under 47 U.S.C. § 214(e) shall be eligible to receive specific federal universal service support.” Pursuant to 47 U.S.C. § 214(e)(1)(A) and (B), a common carrier designated as an ETC must offer the services supported by the federal universal service support mechanisms, using either its own facilities or a combination of its own facilities and resale of another carrier’s services throughout its designated service area, and it must advertise the availability and charges for those services. Pursuant to 47 U.S.C. § 214(e)(2), state commissions bear the primary responsibility for performing ETC designations. Under the same section, the Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience, and necessity, as long as the requesting carrier meets the requirements of 47 U.S.C. § 214(e)(1). Also, before designating an additional ETC for an area served by a rural telephone company, the Commission must determine that the designation is in the public interest.

Requirements for ETC Designation by the Federal

Communications Commission (“FCC”)

In 1997, the FCC issued a Public Notice setting forth the procedures a carrier must use when requesting designation as an ETC from the FCC.¹³ The Commission

¹² *Id.* at 9.

¹³ *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, Public Notice, 12 FCC Rcd 22947, 22948 (1997) (Section 214(e)(6) Public Notice).

likewise collects similar information pursuant to that Notice. A carrier seeking ETC designation must file a petition providing the following: (1) a certification that the petitioner offers all services designated for support by the Commission pursuant to 47 U.S.C. § 254(c); (2) certification that the petitioner offers the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services;¹⁴ (3) a description of how the petitioner advertises the availability of the supported services and the charges therefore using media of general distribution; and (4) if the petitioner is not a rural telephone company, a detailed description of the geographic service area for which it requests designation as an ETC from the Commission.¹⁵

In addition, the FCC's rules require that in order to be designated as an ETC, a petitioner must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) demonstrate its ability to remain functional in emergency situations; (3) demonstrate that it will satisfy applicable consumer-protection and service-quality standards; (4) demonstrate that it is financially and technically capable of providing the Lifeline service; and (5) submit information describing the terms and conditions of any voice telephony plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll

¹⁴ *Lifeline Reform Order*, FCC 12-11 at ¶ 368 (adopting a blanket forbearance of the facilities requirement of 47 U.S.C. § 214(e)(1)(A) for non-facilities based carriers that seek limited ETC designation to participate in the Lifeline program) ("Lifeline Reform Order"). *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Lifeline and Link Up*, WC Docket No. 03-109; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 12-23; *Report and Order and Further Notice of Proposed Rulemaking*, Adopted: January 31, 2012; Released: February 6, 2012.

¹⁵ 47 U.S.C. § 214(e)(6).

calls, and rates for each such plan.¹⁶

Prior to designating an ETC pursuant to 47 U.S.C. § 214(e)(6), the Commission must determine whether such designation is in the public interest.¹⁷ In determining the public interest, the Commission historically has considered the benefits of increased consumer choice and the unique advantages and disadvantages of the petitioner's service offering.

The federal universal service Lifeline program is designed to reduce the monthly cost of telecommunications service for qualifying consumers. The Lifeline program reimburses ETCs for providing qualifying low-income consumers with discounts of \$9.25 off the monthly cost of their telephone service.¹⁸ The Kentucky Lifeline program currently provides additional reimbursement to ETCs for providing eligible consumers with discounts of up to an additional \$3.50 off the monthly cost of their telephone service.¹⁹

As described below, Global Connection has provided the Commission with the information required for designation as an ETC in the service area at issue. We find that the public interest supports such designation, subject to Global Connection's compliance with the representations and commitments made by Global Connection in its application and the FCC's rules. Global Connection must also comply with the conditions set forth in its compliance plan.²⁰

¹⁶ 47 C.F.R. § 54.202(a).

¹⁷ 47 U.S.C. § 214(e)(6); and 47 C.F.R. § 54.202(b).

¹⁸ 47 C.F.R. § 54.403(a)(1).

¹⁹ Administrative Case No. 360, *An Inquiry into Universal Service and Funding Issues* (Ky. PSC May 22, 1998), at 37, determining Kentucky USF support of \$3.50 per line per month.

²⁰ Application at Exhibit B.

Offering the Services Designated for Support

Petitioners for ETC designation must certify that they offer all services designated for support by the Commission pursuant to 47 U.S.C. § 254(c).²¹ Global Connection has demonstrated through the required certifications and related filings that it now offers, or will offer upon designation as a limited ETC, the voice telephony services supported by the Lifeline program. Global Connection certifies that it now provides, or will provide throughout its designated service area, the services and functionalities enumerated in 47 C.F.R. § 54.101(a) throughout the licensed service areas of its underlying carriers.²²

Offering the Supported Services Using a Carrier's Own Facilities

Generally, petitioners for ETC designation must certify that they will offer the supported services using either their own facilities or a combination of their own facilities and the resale of another carrier's services.²³ In its *Lifeline Reform Order*,²⁴ the FCC decided to forbear, on its own motion, from applying the facilities requirement of 47 U.S.C. § 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC's compliance with certain 911 requirements and the ETC's filing with and approval by the FCC of a

²¹ See 47 U.S.C. § 214(e)(1)(A); § 214(e)(6) Public Notice, 12 FCC Rcd at 22948, ¶ 2.

²² Specifically, Global Connection certifies that it provides voice telephony services supported by federal universal service support mechanisms, as set forth in 47 C.F.R. § 54.101, which includes: (1) voice-grade access to the public switched telephone network; (2) local usage; (3) access to emergency services; and (4) Lifeline service plans that do not distinguish between toll and non-toll calls in the pricing of service. See application at 7–10. In the *Lifeline Reform Order*, the FCC adopted rules that provide that toll-limitation service is no longer necessary for any Lifeline service that does not distinguish between toll and non-toll calls in the pricing of service. See *Lifeline Reform Order* at ¶ 49.

²³ 47 U.S.C. § 214(e)(6) Public Notice, 12 FCC Rcd at 22949; See also 47 U.S.C. § 214(e)(1)(A); *Petition of TracFone Wireline, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005) ("*TracFone Forbearance Order*").

²⁴ See generally *Lifeline Reform Order*.

compliance plan describing the ETC's adherence to certain protections prescribed by the FCC. Global Connection opted to pursue forbearance. On August 10, 2016, the FCC approved Global Connection's Compliance Plan ("Compliance Plan").²⁵ A copy of the approved Compliance Plan was included with the application as Exhibit B.

Global Connection, in its provision of wireline services, will offer resold services which Global Connection will obtain from its underlying wireline providers, AT&T Kentucky and Windstream. The service area of its underlying carrier allows Global Connection to provide coverage throughout many markets where eligible consumers need service. Through its service arrangements, Global Connection has shown it is able to offer all of the services and functionalities supported by the universal-service program, as detailed in 47 C.F.R. § 54.101(a), throughout its service area.

Advertising Supported Services

Petitioners for ETC designation must advertise the availability of the supported services and the charges thereof using media of general distribution and provide a description of how they will do so.²⁶ Global Connection has committed to advertise the availability of the supported services using media of general distribution.²⁷ In addition, Global Connection has committed to advertising and promoting the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for Lifeline.²⁸ To increase accountability within the program and to target support where it is needed most, the FCC has adopted rules requiring ETCs to explain in their marketing

²⁵ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Public Notice, DA 16-905 (August 10, 2016).

²⁶ 47 U.S.C. § 214(e)(1)(B); § 214(e)(6) Public Notice, 12 FCC Rcd at 22949, ¶ 4.

²⁷ Application at 12.

²⁸ *Id.*

materials that Lifeline service is a government benefit, that the individual must be eligible to receive the benefit, and that the consumer may receive no more than one benefit at a time from the program.²⁹ Global Connection has demonstrated its commitment to comply with these FCC rules regarding marketing of Lifeline service.³⁰

Designated Service Areas

Petitioners for ETC designation must provide a detailed description of the geographic service area for which they seek designation.³¹ In its application, Global Connection seeks designation as a limited ETC, eligible only for Lifeline support, in the exchanges of the incumbent local exchange carriers of its underlying carriers, AT&T Kentucky and Windstream.³²

Compliance with Applicable Service Requirements

Petitioners for ETC designation must certify that they will comply with all service requirements applicable to the support they receive.³³ The Commission finds that Global Connection has demonstrated its commitment to comply with the FCC's Lifeline rules, and specifically, to comply with the rules regarding consumer enrollment and certification of eligibility.³⁴ The Commission also finds that Global Connection's sample Lifeline certification forms used for consumer enrollment, and attached as exhibits to its

²⁹ *Lifeline Reform Order* at ¶¶ 274-77; 47 C.F.R. § 54.405.

³⁰ Application at 11-12.

³¹ Section 214(e)(6), Public Notice, 12 FCC Rcd at 22949, ¶ 5.

³² Application at 6 and Exhibit A.

³³ 47 C.F.R. § 54.202(a)(1)(i).

³⁴ Application at 15-17.

application, satisfy the FCC's rules.³⁵

Ability to Remain Functional in Emergency Situations

Petitioners for ETC designation must demonstrate their ability to remain functional in emergency situations.³⁶ Global Connection provides service to its customers through other carriers; therefore, it is able to provide to its customers the same ability to remain functional in emergency situations as is currently provided by its underlying wireline providers to their respective customers. Such service includes access to a reasonable amount of back-up power to ensure functionality without an external power source, re-routing of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. The Commission finds that Global Connection has demonstrated its ability to remain functional in emergency situations.³⁷

Satisfaction of Applicable Consumer Protection and Service-Quality Standards

Petitioners for ETC designation must demonstrate that they will satisfy applicable consumer-protection and service-quality standards.³⁸ Global Connection has committed to providing applicable consumer-protection and service-quality standards, including protection of customer information and certifying compliance with the FCC on an annual basis.³⁹ The Commission finds that Global Connection's commitments

³⁵ *Id.* at Exhibit B; 47 C.F.R. § 54.410 (setting forth the Commission rules on subscriber eligibility determination and certification); and *Lifeline Reform Order* at Appendix C (setting forth certification requirements for Lifeline subscribers).

³⁶ 47 C.F.R. § 54.202(a)(2).

³⁷ Application at 13.

³⁸ 47 C.F.R. § 54.202(a)(3).

³⁹ Application at 13; *See also* 47 C.F.R. § 54.202(a)(3).

provide sufficient consumer protection and service quality to consumers.

Financial and Technical Capability

Petitioners for ETC designation must demonstrate that they are financially and technically capable of providing Lifeline-supported services.⁴⁰ Global Connection states that it has been providing services for over 17 years. Global Connection is authorized to provide wireline service in over two dozen states. Global Connection states that it provides both Lifeline and non-Lifelines services to customers and is therefore not dependent on universal service revenues alone. Global Connection also has the support of majority owner, Milestone Partners, a private equity firm.⁴¹ Based on the foregoing, the Commission finds that Global Connection is financially and technically capable of providing Lifeline-supported services.

Information Regarding the Terms and Conditions of Lifeline Plans

Petitioners for ETC designation must submit information regarding the terms and conditions of any voice telephony plans they offer to Lifeline subscribers.⁴² Global Connection plans to offer a variety of wireline Lifeline plans. The basic wireline Lifeline plan will include unlimited local calling. The advantage package which will include 100 minutes of long-distance and caller ID and call waiting. The premium package will include 100 minutes of long-distance and caller ID, call waiting, call forwarding, call return, three-way calling, call blocking, and call trace. Additional minutes of long distance may be purchased at the rate of \$5.00 per 250 minutes or unlimited for

⁴⁰ 47 C.F.R. § 54.202(a)(4); *See also Lifeline Reform Order* at ¶ 387.

⁴¹ Application at 14–15 and Exhibit C.

⁴² 47 C.F.R. § 54.202(a)(5).

\$10.00.⁴³ Global Connection does not conduct credit checks or require service contracts.⁴⁴ Global Connection will reduce its tariffed rate of service by the federal Lifeline discount of \$9.25 and the state-funded discount of \$3.50. Based on the foregoing, the Commission finds that Global Connection offers plans that will serve Lifeline customers.

Public Interest Analysis

Prior to designating an ETC, the Commission must determine whether such designation is in the public interest.⁴⁵ We find that Global Connection offers Lifeline plans that will provide a variety of benefits to Lifeline-eligible consumers, including increased consumer choice, and high-quality service offerings. New entrants in the landline Lifeline service market should incent existing ETCs to offer better service and terms to their subscribers.

Global Connection will provide competitive wireline services throughout its service area in Kentucky. Global Connection is a reseller of wireline service, and it will offer all of the services and functionalities detailed in 47 C.F.R. § 54.101(a), ensuring that Global Connection can provide services to customers throughout the service area.⁴⁶

The Commission recognizes that the designation of Global Connection as an ETC also creates competitive pressure for other wireline and wireless providers that are designated as ETCs within the proposed service areas. In order to remain competitive

⁴³ Application at 6–7.

⁴⁴ *Id.* at 6.

⁴⁵ *See* 47 U.S.C. § 214(e)(6); and 47 C.F.R. § 54.202(b).

⁴⁶ Application at 4, 16.

in low-income markets, all providers will have greater incentive to improve coverage and customer service, increase service offerings, and lower prices. Consistent with federal law, the designation benefits consumers by allowing Global Connection to offer the services designated for support at rates that are “just, reasonable, and affordable.”⁴⁷ Global Connection plans to offer affordable wireline telecommunications service to qualified low-income consumers at a prepaid flat rate so that consumers may manage their telecommunications costs, and they will have the ability to control long-distance costs with prepaid plans as well.⁴⁸

In order to promote public safety and safeguard against waste, fraud, and abuse in the Lifeline program, the Commission finds it necessary to require Global Connection to comply with certain conditions. The designation of Global Connection as a limited ETC is conditioned on Global Connection’s compliance with: (1) the representations and commitments made by Global Connection in its ETC application and its Compliance Plan; and (2) the FCC rules, including those adopted by the FCC in the Lifeline Reform Order and the Third Report and Order, Further Report and Order, and Order on Reconsideration Adopted March 31, 2016.⁴⁹

Subject to the above-stated conditions, the Commission finds that designating Global Connection as an ETC eligible only to receive Lifeline support is in the public interest.

⁴⁷ 47 U.S.C. § 254(b)(1).

⁴⁸ Application at 18.

⁴⁹ See generally *Lifeline Reform Order* and *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, *Third Report and Order, Further Report and Order, and Order on Reconsideration*, FCC 16-38 (rel. Apr. 27, 2106) (“*Third Report and Order*”).

Regulatory Oversight

Under 47 U.S.C. § 254(e), petitioners are required to use the specific universal-service support they receive “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”⁵⁰ An ETC receiving Lifeline support uses that support as intended when it reduces the price of its telecommunications services by the amount of the support for the eligible consumer.⁵¹

As previously noted, Global Connection has an FCC-approved compliance plan that currently governs its provision of Lifeline service.⁵² In providing Lifeline services pursuant to the conditional ETC designation granted herein, Global Connection must comply with the measures described in its existing compliance plan and in its application, as well as the FCC’s rules.

Finally, we note that the Commission or the FCC may institute an inquiry on its own motion to examine the petitioner’s records and documentation to ensure that the universal-service support it receives is being used for the purpose intended.⁵³ The petitioner is required to provide such records and documentation to the Commission, the FCC, or Universal Service Administration Company (“USAC”) upon request. We further emphasize that, if the petitioner fails to fulfill the requirements of the Act, the FCC’s rules, or the terms of this Order after it begins receiving universal-service support, the Commission may exercise its authority to revoke such petitioner’s ETC

⁵⁰ 47 U.S.C. § 254(e). We note that because petitioners are not eligible to receive federal universal service high-cost support, they are not required to file reports and certifications pursuant to 47 C.F.R § 54.313.

⁵¹ See *TracFone Forbearance Order*, 20 FCC Rcd at 15105-06, ¶ 26.

⁵² *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Public Notice, DA 12-828 (December 26, 2012).

⁵³ 47 U.S.C. §§ 220, 403.

designation.⁵⁴ The FCC also may assess forfeitures for violations of FCC rules and orders.⁵⁵

Annual Certification and Verification

Each year Global Connection will require all Lifeline subscribers to recertify their head of household status, certify that only one Lifeline discount is received at their household, and document their continued program eligibility for Lifeline in accordance with the annual Lifeline Certification and Verification for USAC that is due annually.⁵⁶ The Commission finds that Global Connection's plan to meet the annual certification and verification requirements is in accordance with the FCC's requirements.⁵⁷

The Commission, having reviewed the evidence of record and having been otherwise sufficiently advised, HEREBY ORDERS that:

1. The designation of Global Connection as a limited ETC is conditioned on Global Connection's compliance with: (1) the representations and commitments made by Global Connection in its ETC application and its Compliance Plan; and (2) the FCC rules, including those adopted by the FCC in the Lifeline Reform Order.

2. Global Connection is designated as a limited ETC for the purpose of offering Lifeline service only in the underlying carrier's licensed service area in Kentucky.

3. During the current certification period, Global Connection shall be eligible to receive federal and state USF support for Lifeline.

⁵⁴ See *Federal-State Joint Board on Universal Service; Western Wireline Corp. Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, CC Docket No. 96-45, Declaratory Ruling, 15 FCC Rcd 15168, 15174, ¶ 15 (2000); See also 47 U.S.C. § 254(e).

⁵⁵ See 47 U.S.C. § 503(b).

⁵⁶ Case No. 2012-00146, *Lifeline Reform* (Ky. PSC May 1, 2012).

⁵⁷ Application at 15-17.

4. Global Connection shall advertise the availability of and charges for these services using media of general distribution.

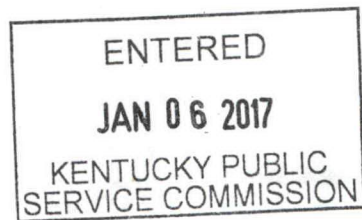
5. Global Connection shall comply with the FCC's annual certification process for Lifeline customers.

6. Global Connection is a utility under the definitions contained in KRS 278.010(3) and shall include revenue generated from the sale of intrastate wireline service, including Lifeline revenues, in its reports filed pursuant to KRS 278.140.

7. Global Connection shall file its specific Lifeline plan for Kentucky subscribers and revise its tariff within 20 days of the date of this Order.

8. A copy of this Order shall be served upon the FCC and the USAC.

By the Commission



ATTEST:


Executive Director

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