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October 25, 2011

RECEIVED

OCT 27 2011

PUBLIC SERVICE
COMMISSION

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40601

*RE: Petition of Cintex Wireless for Designation as an Eligible
Telecommunications Carrier in the Commonwealth of Kentucky*

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of Cintex Wireless, LLC's ("Cintex")
Petition for Designation as an Eligible Telecommunications Carrier.

Please place your file stamp on the extra copy and return to me via the enclosed self-
addressed, postage paid envelope.

If you have any questions concerning this filing, please do not hesitate to contact me.
Thank you very much for your attention to this matter.

Very truly yours,

STOLL KEENON OGDEN PLLC

Douglas F. Brent

Enclosure

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 27 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

Petition of Cintex Wireless, LLC For Designation)
as an Eligible Telecommunications Carrier in the)
Commonwealth of Kentucky for the Limited Purpose)
of Offering Lifeline and Link Up Service to) CASE NO. 2011-_____
Qualifying Households)

**PETITION OF CINTEX WIRELESS, LLC FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER ON A WIRELESS BASIS
FOR THE LIMITED PURPOSE OF OFFERING WIRELESS LIFELINE
AND LINK UP SERVICE TO QUALIFYING HOUSEHOLDS**

Cintex Wireless, LLC (“Cintex”), by its undersigned counsel, hereby petitions the Kentucky Public Service Commission (the “Commission”) for designation as an eligible telecommunications carrier (“ETC”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ and Section 54.201 *et seq.* of the rules of the Federal Communications Commission (“FCC”).² Cintex seeks designation as an ETC only to participate in the federal and Kentucky Lifeline and federal Link Up programs. Cintex will not seek funds from the Universal Service Fund to provide service to high-cost areas.

Cintex satisfies all of the statutory and regulatory requirements for designation as an ETC. Moreover, Cintex’s petition is comparable to that of other pre-paid wireless providers designated as ETCs by the Commission and does not raise any unique issues. Cintex has an agreement in place with Sprint-Nextel Corporation (“Sprint-Nextel”) that allows it to obtain the

¹ 47 U.S.C. § 214(e)(6).

² 47 C.F.R. §§ 54.201 *et seq.*

resold services that it needs to supplement the services provided through Cintex's owned facilities.

Since Cintex satisfies the statutory and regulatory requirements for designation as an ETC, and since this petition does not raise any new issues, Cintex respectfully requests the Commission to grant this petition as soon as possible so that Kentucky consumers can benefit from Cintex's Lifeline offering as quickly as possible.

I. ABOUT CİNTEX

Cintex is a Delaware limited liability company formed on June 29th, 2007. The company is registered as a foreign business entity with the Kentucky Secretary of State and has registered as a utility (ID 4106600) with the Commission. Cintex currently provides commercial mobile radio services ("CMRS") to several thousand subscribers throughout its service territory in other states, primarily under the "Movida" and "Liberty" brands.

As discussed above, Cintex currently obtains service from Sprint-Nextel. The agreement with Sprint-Nextel enables Cintex to offer service wherever Sprint-Nextel offers service. Cintex intends to grow significantly in the coming years by offering competitive rate plans and excellent service to its target market of low income consumers who primarily live in urban areas.

Cintex's marketing and distribution model is focused directly towards low-income communities and neighborhoods. Cintex intends to sell its phones and services through inner-city retailers, grocery stores, convenience stores, hair salons, and clothing stores. Most of the people in the communities in which Cintex will market its services do not have convenient access to "Big-Box" retail stores and many lack Internet access. Cintex will provide airtime terminals at its retail locations for its customers to purchase additional minutes for their phone plans. Cintex's "main street" approach and "grass-roots" sales and distribution network

effectively reaches low-income communities in the states that it serves. In addition, airtime minutes may also be purchased by calling Cintex's customer service number or online. While Cintex will not confine its service offerings to the inner-cities, its focus on this market segment is directly relevant to its request for designation as an ETC to be able to participate in the Lifeline and Link Up programs. By providing service to this market segment, Cintex will ensure that many Americans who cannot afford or access the services provided by other wireless providers can still enjoy the benefits of wireless telecommunications.

Cintex will provide its customers prepaid services. It does not require customers to sign long-term contracts nor does it impose early termination fees. Cintex will also provide a wide choice of handsets.

II. THE COMMISSION HAS JURISDICTION TO DESIGNATE CINTEX AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), the Commission has the jurisdiction to designate telecommunications carriers as ETCs.³ The Act provides that "[a] State Commission *shall* upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier." (emphasis added).

III. CINTEX'S LIFELINE AND LINK UP OFFERING

Cintex will offer its Lifeline service through its own facilities and through its resale agreement with Sprint-Nextel or another underlying carrier. *Cintex will offer each eligible customer 90 free anytime local and long distance minutes per month. Any unused minutes will roll over from month-to-month. Cintex will not charge a monthly recurring fee; the service will be strictly a pay-as-you-go service.*

³ 47 U.S.C. § 214(e)(2).

In the event that a customer uses all of his minutes, the customer may purchase additional airtime minutes.

Wireless handsets will be provided to qualifying Lifeline customers free of charge. The service will include caller ID, call waiting, call forwarding, 3-way calling and voicemail.

Cintex also seeks Link-Up support for its customers. Link Up support offers customers “[a] reduction in the carrier’s customary charge for commencing telecommunications service for a single telecommunications connection at a consumer’s principal place of residence. The reduction shall be half of the customary charge or \$30.00, whichever is less.”⁴ Cintex will charge a customary charge for commencing telecommunications service of \$60.00. Cintex will recover \$30.00 of this activation fee through disbursements from USAC, and customers will have the option of receiving a waiver of the remaining activation charge (i.e., \$30.00), pursuant to a company issued promotion.

IV. CİNTEX REQUESTS DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER THROUGHOUT ITS WIRELESS SERVICE AREA

For non-rural service areas, there are no restrictions on how a state commission defines the service area for purposes of designating a competitive ETC. The carrier must describe the geographic areas within which it requests designation.⁵ Moreover, with respect to rural service areas, Cintex is not seeking high cost support, so this petition presents no “cream skimming” issues. Finally, the Commission has determined that when a wireless carrier seeks only low income support, no rural study area will require redefinition to match the licensed service area of

⁴ 47 C.F.R. § 54.411(a)(1).

⁵ Public Notice – Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act, FCC 97-419, 12 FCC Rcd 22947 (1997).

the applicant.⁶ Accordingly, Cintex requests designation as an ETC within the entirety of its wireless service area.

V. CİNTEX WILL PROVIDE THE NINE SUPPORTED SERVICES

In order to be designated an ETC, a carrier must offer all of the services “supported by the universal service support mechanisms”⁷ which are enumerated in Section § 54.101(a) of the FCC’s rules. Cintex provides each of the enumerated services, other than toll limitation, which Cintex is not required to provide for reasons discussed below. Each of the supported services is discussed in turn.

1. Voice grade access to the public switched network.

Voice grade access to the public switched telecommunications network (“PSTN”) means the ability to make and receive traditional voice phone calls using frequencies between approximately 500 Hertz and 4,000 Hertz for a bandwidth of approximately 3500 Hertz.⁸ The voice grade access provided by Cintex enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving signals indicating there is an incoming call.

2. Local usage.

As part of the voice grade access to the PSTN, an ETC must provide local calling. Cintex provides subscribers the ability to send and receive local phone calls wherever it provides service. Moreover, local usage is in all of Cintex’s calling plans, including those plans that will comprise Lifeline offerings. FCC Rule 54.202(a)(4) requires an ETC applicant to “demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the

⁶ Virgin Mobile USA, L.P., Order, Case No. 2010-00524 at 12 (June 10, 2011).

⁷ 47 U.S.C. § 214(e)(1)(A).

⁸ See Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) (“USF Order”).

service areas for which it seeks designation.”⁹ The FCC has explained that an ETC applicant’s local usage plans should be reviewed on a case-by-case basis to ensure that each ETC provides a local usage component in its universal service offering that is comparable to the plan offered by the incumbent LEC in the area.¹⁰ In examining what are “comparable” plans the FCC has not adopted any minimum local usage requirements.¹¹ As a designated ETC, Cintex will comply with any local usage requirements adopted by the FCC. Most importantly, as described in section III above, Cintex’s Lifeline offerings will go beyond those of other ETCs that require an outlay of cash from the customer. Cintex’s Lifeline customers will receive as part of their Lifeline service specified amounts of *free* wireless service. That is, Lifeline customers will be able to use Cintex’s service to initiate and receive specified amounts of wireless calling – local and long distance – free of charge.

3. Dual tone multi-frequency (“DTMF”) signaling or its functional equivalent.

DTMF signaling allows carriers to provide expeditious call set-up and call detail information.¹² The FCC permits carriers to provide signaling that is functionally equivalent to DTMF to satisfy this requirement. All telephone handsets provided by Cintex are DTMF-capable.

4. Single-party service or its functional equivalent.

Single-party service means that only one party will be served by a subscriber line or access for the duration of every phone call. Cintex does not provide “multi-party” or “party line” services.

⁹ 47 C.F.R. § 54.202(a)(4).

¹⁰ Federal-State Joint Board on Universal Service, Report and Order, 20 FCC Rcd 6371 (2005).

¹¹ Id. ¶ 32.

¹² USF Order, 12 FCC Rcd at 8814.

5. Access to 911 and E911 emergency service.

The FCC has declared that access to emergency services is essential.¹³ Cintex provides universal access to the 911 system for its customers. Cintex offers enhanced 911 (“E-911”) services wherever such services are offered by Sprint-Nextel. In particular, Cintex will comply fully with the FCC’s E-911 requirement applicable to wireless resellers.¹⁴ Pursuant to the FCC’s E-911 Order, providers that use other carriers’ facilities to provide wireless voice service to customers have an obligation to comply with the FCC’s E-911 rules “to the extent that the underlying facilities-based licensee has deployed the facilities necessary to deliver enhanced 911 information to the appropriate PSAP [public service answering point].”¹⁵

6. Access to operator services.

Cintex offers all of its customers access to operator services, in part through its own facilities. This is explained further in section VIII below.

7. Access to interexchange service.

Cintex customers can use Cintex services to complete toll calls. In fact, Cintex does not impose separate charges for interexchange calls. Long distance calling is included in Cintex service with no additional charge.

8. Access to directory assistance.

All Cintex customers receive access to directory assistance service in part through Cintex’s own facilities. This is explained further in section VIII. Unlike some providers, Cintex will offer its customers directory assistance at no charge. Specifically, calls to directory assistance will consume airtime like any other call would; however, Cintex will not assess any additional surcharge for such calls as is customary in the industry.

¹³ Id. at 8815.

¹⁴ See Revision of the Commission’s Rules to Ensure Compatibility With Enhanced 911 Emergency calling Systems, Report and Order and Second Further Notice of proposed Rulemaking, 18 FCC Rcd 25340 (2003) (“E-911 Order”).

¹⁵ Id. ¶ 91.

9. Toll limitation for qualified low-income customers.

There is no need for Cintex to offer a toll limitation feature to qualifying low-income customers. Since Cintex's service is a prepaid service, no customers will be disconnected for failure to pay toll charges or, for that matter, any other charges. Inasmuch as all Cintex services are prepaid there is no danger that low income customers will incur large charges for heavy toll (or other) calling and no risk that they will be disconnected for nonpayment. Since customers pay for the service in advance they can use only what they already have paid for or what service quantities have been provided to them under the Lifeline program. Thus, Cintex's prepaid services are especially beneficial since the consumers have controls or limits for their charges for toll services (as well as local service) that customers of traditional post-paid services generally do not.

VI. CINTEX WILL ADVERTISE THE AVAILABILITY OF THE SUPPORTED SERVICES

Section 54.201(d)(2) of the FCC's rules provide that an ETC must "[a]dvertise the availability of such services and the charges therefore using media of general distribution."¹⁶ Further, a carrier offering Lifeline must "[p]ublicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service."¹⁷ Similarly, a carrier must "publicize the availability of Link Up support in a manner reasonably designed to reach those likely to qualify for the support."¹⁸

Cintex will advertise its Lifeline and Link Up offerings in traditional media such as television, radio and/or print. The advertisements will be placed on programming and in newspapers that target eligible consumers. Cintex will also make potential customers aware of

¹⁶ 47 C.F.R. § 54.201(d)(2).

¹⁷ 47 C.F.R. § 54.405(b).

¹⁸ 47 C.F.R. § 54.411(d).

its service through direct mail. Direct mail advertising will be targeted towards low income consumers.

VII. CİNTEX SATISFIES ALL ADDITIONAL REQUIREMENTS FOR DESIGNATION AS AN ETC

In addition to providing the supported services discussed in section V above, Cıntex satisfies the FCC's remaining requirements for designation as an ETC. These additional requirements are discussed below.

1. Cıntex Will Offer Service to Requesting Customers Within a Reasonable Time

Cıntex offers service through a combination of its own facilities and the facilities of Sprint-Nextel. The network is operational and Cıntex will be able to activate customers "on a timely basis" as required by Section 54.202(a)(1) of the FCC's rules.¹⁹ Moreover, Cıntex will be in a position to offer its Lifeline service quickly after the Commission approves this petition.

2. Cıntex Can Remain Functional in Emergency Situations

Section 54.202(a)(2) of the FCC's rules requires that a carrier seeking to be designated as an ETC demonstrate that it has the ability to remain functional in emergency situations.²⁰ Cıntex has the same ability to remain functional in emergency situations as Sprint-Nextel, its underlying provider.

3. Cıntex Will Satisfy Consumer Protection and Service Quality Standards

A carrier requesting designation as an ETC must "demonstrate that it will satisfy applicable consumer protection and service quality standards."²¹ This requirement is satisfied by a wireless applicant if it commits to "comply[ing] with the Cellular Telecommunications and

¹⁹ 47 C.F.R. § 54.202(a)(1).

²⁰ 47 C.F.R. § 54.202(a)(2).

²¹ 47 C.F.R. § 54.202(a)(3).

Internet Association's Consumer Code of Wireless Service.”²² Cintex will comply with the Consumer Code.

4. Cintex Offers a Local Usage Plan Comparable to Those Offered by the Incumbent Local Exchange Carrier

A carrier applying for ETC status must “[d]emonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service area for which it seeks designation.”²³ By approving the applications for ETC designation of other prepaid wireless providers, which describe Lifeline offerings structured in a manner similar to that of Cintex, the Commission has already implicitly concluded that Cintex's Lifeline service offering satisfies this requirement.

5. Cintex Will Provide Equal Access

As required by FCC rule 54.202(a)(5), Cintex will “provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.”²⁴

6. Cintex Will Comply With the FCC's and Commission's Lifeline and Link Up Certification and Verification Requirements

The FCC's rules require ETCs to comply with certain requirements of initial certification of eligibility for participation in the Lifeline and Link Up programs.²⁵ Cintex will certify customers in accordance with those rules.

In addition, Cintex will verify customers' continued eligibility for the Lifeline program in accordance with Commission orders.²⁶ Specifically, Cintex will verify, on an annual basis, “the

²² Id.

²³ 47 C.F.R. § 54.202(a)(ii)(4).

²⁴ 47 C.F.R. § 54.202(a)(5).

²⁵ 47 C.F.R. §§ 54.410, 54.416.

²⁶ E.g., An Inquiry into Universal Service and Funding Issues, Order, Case No. 360, 2007 Ky. PUC LEXIS 413 (2007).

eligibility of all current Lifeline subscribers.”²⁷ Cintex will submit the results of the audits to the Commission.

VIII. CİNTEX WILL PROVIDE THE SUPPORTED SERVICES OVER A COMBINATION OF ITS OWN FACILITIES AND RESALE OF ANOTHER CARRIER’S SERVICES

As required by the Act and FCC rules, Cintex will provide certain services supported by the universal service support mechanisms using a combination of its own facilities and the facilities of Sprint-Nextel.²⁸ Cintex will provide access to directory assistance and access to operator services in part over its own facilities. Thus, Cintex uses its own facilities to provide two of the supported services.

The FCC’s rules define “facilities” as “any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of [Part 54].”²⁹ Cintex uses its own physical components to route directory assistance and operator services calls. These calls will be routed by Cintex to either its own call center or to a vendor that will provide directory assistance and operator services.

The FCC has been clear that a carrier does not have to use its own facilities to provide all of the supported services in order to be designated an ETC. The FCC explained that “if a carrier uses its own facilities to provide at least one of the designated services, and the carrier otherwise meets the definition of “facilities” adopted here, then the facilities requirement of Section 214(e) is satisfied.”³⁰

²⁷

Id.

²⁸ 47 U.S.C. § 214(e)(1)(A), 47 C.F.R. § 54.201(d)(1) (an ETC must offer the supported services “using its own facilities or a combination of its own facilities and resale.”)

²⁹ 47 C.F.R. § 54.201(e).

³⁰ USF Order, 12 FCC Rcd at 8870-71.

Further, Section 214(e)(1)(A) of the Act makes it clear that a carrier is eligible to become an ETC if it provides the supported service(s) via a “combination” of its own facilities and resale.³¹ Cintex is not required to provide 411 and operator services exclusively through its own facilities. Thus, by owning physical components that route 411 and operator services calls, Cintex satisfies the statutory requirement mandating that ETCs provide service “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”³²

IX. DESIGNATING CİNTEX AN ETC IS IN THE PUBLIC’S INTEREST

1. Designating Cintex an ETC Will Create Greater Competition and Choice for Kentucky Consumers

Cintex’s Lifeline offering will provide low income Kentucky consumers with increased competitive choice and the benefits of Cintex’s unique Lifeline service. As discussed in section III above, Cintex intends to offer Cintex consumers 90 free minutes that roll over from month-to-month. Moreover, Cintex will provide Cintex consumers with additional minutes at a low cost. Eligible consumers will benefit significantly from Cintex’s low cost service. And in response to Cintex’s Lifeline offering, other carriers that provide Lifeline service will have an incentive to improve their Lifeline service offerings.

2. Cintex will Take Significant Measures to Minimize Waste and Fraud

Cintex will adopt practices and procedures designed to avoid waste and fraud. These include the following:

A. Certification and Verification.

Cintex will certify and verify consumers consistent with FCC and Commission rules and orders.³³ Such certification will include the eligible customer self-certifying under penalty of perjury that they are enrolled in one of the public assistance programs that qualify them for the

³¹ 47 U.S.C. § 214(e)(1)(A).

³² 47 U.S.C. § 214(e)(1).

³³ 47 C.F.R. §§ 54.409 and 54.410; An Inquiry into Universal Service and Funding Issues, Order, Case No. 360, 2007 Ky. PUC LEXIS 413 (2007).

discount.³⁴ The certification will be made prior to the activation of service. Further, each customer will be required to certify under penalty of perjury prior to service activation that he or she is the head of household and is only receiving a Lifeline discount from Cintex. The customer must also certify under penalty of perjury that he or she will notify Cintex if he or she is no longer eligible for Lifeline assistance. Cintex will also verify annually that each consumer remains eligible for the Lifeline program.

B. Track Customer's Primary Address.

Cintex will track each Lifeline customer's primary address to ensure that Cintex does not enroll multiple persons living at the same address into the Lifeline program.

C. Non-Usage Policy

Cintex will adopt a 60-day non-usage policy for Kentucky consumers. Pursuant to the policy, if there is no usage on an account during any 60-day period, Cintex will notify the customer that it will no longer participate in the Lifeline program if there is no usage on the account during a subsequent 30-day grace period. During the grace period, the customer's account will remain active, and the customer will receive an allocation of free minutes.

Further, during the grace period, Cintex will engage in outreach efforts, primarily in the form of text messages, to determine if the customer wishes to remain a Lifeline customer and to inform the customer that he or she will be withdrawn from the Lifeline program if the customer does not use the service within the grace period.

Usage during the grace period includes making or receiving a call, including to "911" service, sending or receiving a text message, downloading data and adding money to the account. If there is usage during the grace period, the customer's lifeline service will be continued.

³⁴ Id.

In the event that there is no usage during the grace period, the customer will be de-enrolled from the Lifeline program. In particular, the customer will no longer receive an allotment of free minutes; subsequently, the customer will have to purchase airtime just like any other customer in order to use the Cintex service. In addition, Cintex will no longer include the customer's number on USAC Form 497 going forward and will not seek a subsidy from the Universal Service Administrative Company for the free minutes provided during the grace period.

If the customer does not use the service at all for an additional 120 days after the end of the grace period, the customer's account will be deactivated and the customer's telephone number may be assigned to another customer.

D. Universal Service Funds will Flow Through to Customers.

One hundred percent of federal universal service funds will flow through directly to customers.

E. Cintex Advertising.

All Cintex advertising will be unambiguous, informative and consistent with applicable federal and state consumer protection statutes.

F. Live Customer Assistance.

Cintex will provide live customer service to its Lifeline customers. The customer service number is 877-304-9183. This will help Cintex detect service quality issues, if any, with its Lifeline offering.

G. Minimal Impact on the Universal Service Fund.

Designating Cintex as an ETC will have minimal impact on the Universal Service Fund. Cintex seeks designation as an ETC for participation in the Lifeline and Link Up program only; it does not seek access to funds for the purpose of providing service to high-cost areas. Low

income support accounts for a relatively small percentage of funds distributed by USAC. Further, the FCC concluded that “[a]ny increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible participation in the Lifeline program, furthering the statutory goal of providing access to low-income consumers.”³⁵ The fact that the Commission has designated Tracfone, Cincinnati Bell Wireless, Assurance and other prepaid wireless providers as ETCs demonstrates that the Commission’s support for the Lifeline and Link Up programs is consistent with that of the FCC.

X. CONCLUSION

Based on the foregoing, Cintex has demonstrated that it is eligible to be designated an ETC. Cintex respectfully requests that the Commission grant this petition expeditiously.

Dated, October 25, 2011

Respectfully submitted,



Douglas F. Brent
STOLL KEENON OGDEN, PLLC
2000 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202

Counsel for Cintex Wireless, LLC

³⁵ Petition of TracFone Wireless, Inc. for Forbearance from 47 USC § 214(e)(1)(A) and 47 CFR § 54.201(i), 20 FCC Rcd 15095, ¶ 17 (2005).

STATE OF Maryland)
)
COUNTY OF Montgomery)

Declaration of Cintex Wireless, LLC

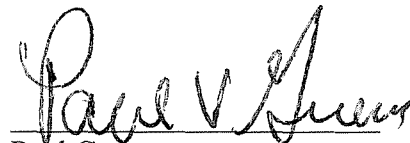
I, Paul Greene, verify the foregoing petition as follows:

1. I am employed as managing member of Cintex Wireless, LLC (“Cintex”) and am authorized to sign this verification on Cintex’s behalf.

2. I have read the Cintex petition and verify that the facts contained therein are true to the best of my knowledge, and the opinions contained therein are correct to the best of my belief.

3. To the best of my knowledge, Cintex Wireless, LLC, including all officers, directors, or persons holding 5 percent or more of the outstanding stock or shares (voting or non-voting) of the Company, are not subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

4. I declare and penalty of perjury that the foregoing is true to the best of my knowledge.


Paul Greene

Dated: October 24, 2011