

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for designation as eligible telecommunications carrier (ETC) by Global Connection Inc. of America. | DOCKET NO. 090514-TX
ORDER NO. PSC-11-0389-PAA-TX
ISSUED: September 15, 2011

The following Commissioners participated in the disposition of this matter:

ART GRAHAM, Chairman
LISA POLAK EDGAR
RONALD A. BRISÉ
EDUARDO E. BALBIS
JULIE I. BROWN

NOTICE OF PROPOSED AGENCY ACTION
ORDER GRANTING ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

Case Background

On November 17, 2009, Global Connection Inc. of America (“Global” or “Applicant”) petitioned the Florida Public Service Commission (“FPSC” or “Commission”) for designation as an eligible telecommunications carrier (“ETC”) in certain BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T”), Embarq-Florida, Inc. (“Embarq”), Verizon Florida (“Verizon”), and Windstream exchanges for the purpose of receiving federal universal service support in Florida. Global is seeking only low-income support, and is not requesting high-cost support. Global subsequently amended its application, removing its request for ETC designation in the Embarq, Windstream, and Verizon service areas. The Applicant intends to provide local exchange and exchange access services in the designated service areas using a combination of resale and unbundled network elements (“UNEs”). Global does not seek designation as an ETC in any areas served by rural telephone companies or in any tribal areas in the State of Florida.

Global is a Georgia corporation authorized to conduct business as a foreign corporation in Florida and is a competitive local exchange carrier (“CLEC”) certificated by this Commission. Global is also certified as a CLEC in Alabama, Arkansas, Colorado, Georgia, Indiana, Kentucky, Louisiana, Maryland, Michigan, Missouri, Mississippi, North Carolina, Ohio, South Carolina, Tennessee, Texas, and Wisconsin. Global has wireline ETC petitions pending in South Carolina, and Tennessee. Global also has wireless ETC petitions pending in Georgia, Kansas, Michigan, Missouri, Oregon, Pennsylvania, Washington, and West Virginia. As of August 2011, Global

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has received funds from the Universal Service Administrative Company (“USAC”) for Alabama, Arkansas, Georgia, Louisiana, Michigan and North Carolina.

Upon designation as an ETC in Florida, Global states that it will participate in, and offer Lifeline and Link-Up programs to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Global offers a local usage plan comparable to the one offered by the incumbent local exchange company (“ILEC”) in the service areas for which it seeks designation. Global provides its customers with the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Global commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service. Global has also committed to abide by both state and federal rules and procedures. *See* Attachment A of this Order.

Pursuant to Section 364.10(1)(a), Florida Statutes, we have authority to decide a petition by a CLEC seeking designation as an ETC.

Review and Decision

Pursuant to FCC rules, state commissions have the primary responsibility to designate providers as ETCs. Designation as an ETC is required in order for a provider to be eligible to receive monies directly from the Federal Universal Service Fund (“USF”). Section 254(e) of the Telecommunications Act of 1996 (“Act”) provides that “only an eligible telecommunications carrier designated under Section 214(e)...shall be eligible to receive specific Federal universal service support.” Pursuant to Section 214(e)(1) of the Act, a common carrier designated as an ETC must offer and advertise the services supported by the federal universal service mechanisms throughout a designated service area.

ETC Certification Requirements

47 C.F.R. § 54.201(c) establishes a state commission’s responsibilities related to ETC designation as follows:

Upon request and consistent with the public interest, convenience, and necessity, the state commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the state commission, so long as each additional requesting carrier meets the requirements of paragraph (d) of this section. Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the state commission shall find that the designation is in the public interest.

To qualify as an ETC, telecommunications carriers must provide the following nine services:

- (1) Voice grade access to the public switched network Voice grade access is defined as a functionality that 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 a signal indicating there is an incoming call.
- (2) Local Usage Local usage indicates the amount of minutes of use of exchange service, provided free of charge to end users.
- (3) Dual tone multi-frequency signaling or its functional equivalent Dual tone multi-frequency (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, thus shortening call set-up time.
- (4) Single-party service or its functional equivalent Single party service is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission.
- (5) Access to emergency services Access to emergency services includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations.
- (6) Access to operator services Access to operator services is defined as access to any automatic or live assistance to a consumer to arrange for billing and/or completion, of a telephone call.
- (7) Access to interexchange service Access to interexchange service is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network.
- (8) Access to directory assistance Access to directory assistance is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings.
- (9) Toll limitation for qualifying low-income consumers Toll limitation or blocking restricts all direct dial toll access.

47 C.F.R. § 54.201(d)(1) (Cross-referencing 47 C.F.R. § 54.101).

In addition to providing the services described above, ETCs must advertise the availability of such services and the associated charges using media of general distribution. An ETC applicant must also demonstrate:

- (1) a commitment and ability to provide the supported services throughout the designated area
- (2) the ability to remain functional in emergency situations
- (3) the ability to satisfy consumer protection and service quality standards
- (4) a provision of local usage comparable to that offered by the incumbent LEC
- (5) an acknowledgement that the applicant may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.

See, In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order FCC 05-46, Adopted: February 25, 2005, Released: March 17, 2005. (Adopted by Florida in Order No. PSC-05-0824-FOF-TL, issued on August 15, 2005, in Docket No. 010977-TL, *In re: State Certification of Rural Telecommunications Carriers Pursuant to 47 C.F.R. 54.314.*)

Public Interest Determinations

Pursuant to Section 214 of the Act, a state commission must determine that an ETC designation is consistent with the public interest, convenience, and necessity for rural areas. Congress did not establish specific criteria to establish the public interest; the public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas. *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order FCC 05-46 (¶40), Adopted: February 25, 2005 Released: March 17, 2005. This Commission has determined that, before designating a carrier as an ETC, we should make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier. *See e.g.*, Order No. PSC-10-0634-PAA-TX, issued October 25, 2010, in Docket No. 100124-TX, *In RE: Petition for designation as eligible telecommunications carrier by Sun-Tel USA, Inc.*

The FCC and state commissions have used additional factors to determine whether the designation of an ETC is in the public interest. A rigorous ETC designation process ensures that only fully qualified applicants receive designation as ETCs and that all ETC designees are prepared to serve all customers within the designated service areas. In this context, we find that if there is a future change of Global's ownership, the new owners shall be required to file a petition with this Commission and make a showing of public interest to maintain the ETC designation. This will ensure that only carriers that are financially viable, likely to remain in the market, willing and able to provide supported services throughout the designated service areas, and able to provide an evolving level of universal service, are designated as ETCs.

Transitional Lifeline

ETCs must offer discounted residential basic local telecommunications service at 70 percent of the residential local telecommunications service rate for any Lifeline subscriber who no longer qualifies for Lifeline. A Lifeline subscriber who requests such services receives the discounted price for a period of one year after the date the subscriber ceases to be qualified for Lifeline. Section 364.105, Florida Statutes. Global understands that it must provide a 30 percent monthly discount off of its local rate to such customers for a period of 12 months at Global's expense.

Lifeline Advertising

Upon designation as an ETC, Global states that it will participate in, and offer Lifeline and Link-Up programs to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Global regularly advertises all product offerings in English and Spanish.

Facilities Requirement

An ETC must offer the services that are supported by the federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services. 47 C.F.R. 54.201(d)(1). The term "own facilities" includes facilities obtained as UNEs. 47 C.F.R. § 54.201(f). A company must prove to this Commission that it has the ability to purchase UNEs or UNE equivalents either through an interconnection agreement or a commercial agreement. Global has shown that it has an active interconnection agreement with AT&T and has the ability to purchase UNEs or UNE equivalents. Global states that it intends to offer all of the supported services enumerated under Section 254(c) of the Act using facilities obtained as UNEs or UNE equivalents.

Pursuant to Rule 25-4.0665(20), Florida Administrative Code, ETCs offering Link-Up and Lifeline service must submit quarterly reports to this Commission, no later than 30 days following the ending of each quarter. The quarterly reports must include the following data:

- (1) the number of Lifeline subscribers, excluding resold Lifeline subscribers, for each month during the quarter
- (2) the number of subscribers who received Link-Up for each month during the quarter
- (3) the number of Lifeline subscribers added each month during the quarter
- (4) the number of transitional Lifeline subscribers who received discounted service for each month during the quarter
- (5) the number of residential access lines with Lifeline service that were resold to other carriers each month during the quarter.

Conclusion

Upon review, and subject to Global's commitment to abide by all applicable federal and state substantive and procedural requirements, we find that Global's petition for a landline-only ETC designation is in the public interest and shall be approved for the AT&T wire centers listed in Attachment B of this Order. Such approval is for the sole purpose of offering Lifeline and Link-Up discounts to qualifying consumers. Should Global decide to seek High Cost universal service funds, or ETC status in other area(s), it must file a petition with this Commission and request such authority. Such a request will be subject to a public interest review by this Commission. If there is a change in Global's ownership, the new owner(s) shall be required to file a petition with this Commission and demonstrate that it is in the public interest for Global to maintain its ETC designation. When Global files each quarterly report, as discussed above, Global must include the number of UNEs that it has purchased from AT&T for each month during the quarter. This information will permit our staff to confirm that Global is following FCC rules which require that an ETC must offer the services that are supported by the federal universal support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services. Our staff will continue the necessary oversight to ensure that Global, along with other ETCs in Florida, are upholding applicable principles and attaining the goals and objectives of both the state and federal universal service programs.


Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that, subject to the conditions set in the body of this Order, Global Connection Inc. of America is hereby granted landline-only ETC designation in the AT&T wire centers listed in Attachment B of this Order for the sole purpose of offering Lifeline and Link-Up discounts to qualifying consumers in Florida. It is further,

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall be closed.

By ORDER of the Florida Public Service Commission this 15th day of September, 2011.



ANN COLE
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
(850) 413-6770
www.floridapsc.com

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our action granting eligible telecommunications carrier designation, is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Office of Commission Clerk, at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on October 6, 2011. If such a petition is filed, mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing. In the absence of such a petition, this order shall become effective and final upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Any party adversely affected by the Commission's final action in this matter may request: (1) reconsideration of the decision by filing a motion for reconsideration with the Office of Commission Clerk, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Office of Commission Clerk and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

APPLICANT CERTIFICATION

State of Georgia
County of Gwinnett

My name is David M. Skogen I am employed by Global Connection, Inc., located at 5555 Oakbrook Parkway Suite 620 Norcross GA 30093 as its CEO. I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireline Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

Company hereby certifies the following:

1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers, and the Florida Link-Up and Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service.
3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
4. Company understands that if its petition for ETC designation is approved, it will be for limited ETC designation to provide landline-only Link-Up, Lifeline, and toll-limitation service, and the Company will be eligible only to receive low-income support from the Universal Service Fund.
5. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to the change of ownership and make a showing of public interest to maintain the ETC designation.
6. Company understands that it may only receive reimbursement from the Universal Service Administrative company (USAC) for active customer Link-Up and Lifeline access lines which are provided using its own facilities or a combination of its own facilities and access lines obtained as wholesale local platform lines (formerly UNE lines) from another carrier. The Company shall not apply to USAC for reimbursement of any Link-Up and Lifeline access lines obtained from an underlying carrier which already receive a Lifeline and/or Link-Up credit provided by the underlying carrier.
7. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records

to document compliance with all federal and state requirements governing the Lifeline/Link-Up programs for as long as the consumer receives Lifeline service plus three years.

8. Company understands that low income support reimbursed by USAC for toll limitation service is available only for the incremental costs that are associated exclusively with toll limitation service.
9. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
10. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
11. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC, along with supporting signed customer Lifeline certifications to:

Florida Public Service Commission
Division of Regulatory Analysis, Market Practices Section
2540 Shumard Oak Drive
Tallahassee, Florida 32399-0850
12. Company understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bills, \$3.50 of which is provided by the ETC, and \$10.00 of which is reimbursable from the Federal Universal Service Fund.

I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.



Signature
David Skogen
Printed Name

July 5, 2011
Date

Business Address:
5055 Oakbrook Parkway Suite 620
Norcross GA 30093

AT&T Areas

FMTNALMTRSO	FLBHFLMARSO	JCVLFLCLOST	MIAMFLNSDSO	PAHKFLMARSO	WPBHFLANDSO
ARCHFLMARSO	FRBHFLFPDSO	JCVLFLCLDSO	MIAMFLOLDSO	PCBHFLNTDSO	WPBHFLGADSO
BCRTFLBTDSO	FTGRFLMARSO	JCVLFLFCDSO	MIAMFLPBDSO	PLCSFLMADSO	WPBHFLGR02T
BCRTFLMADS1	FTLDFLCRDSO	JCVLFLIARSO	MIAMFLPLDSO	PLTKFLMADSO	WPBHFLGRDSO
BCRTFLSADSO	FTLDFLCYDSO	JCVLFLJTRSA	MIAMFLPLRSO	PMBHFLCSDSO	WPBHFLHHDSO
BGPIFLMARSO	FTLDFLIADSO	JCVLFLJFDSO	MIAMFLRRDSO	PMBHFLFEDSO	WPBHFLHRSO
BKVLFLJFDSO	FTLDFLMRDSO	JCVLFLNODSO	MIAMFLSHDSO	PMBHFLMADSO	WPBHFLLED5O
BLDWFLMARSO	FTLDFLOADSO	JCVLFLOWDSO	MIAMFLSODSO	PMBHFLNPRSO	WPBHFLRB84E
BLGLFLMADSO	FTLDFLPLDSO	JCVLFLRV38E	MIAMFLWDDSO	PMBHFLTADSO	WPBHFLRPDSO
BNNFLMARSO	FTLDFLSGDSO	JCVLFLSJ73E	MIAMFLWMDSO	PMPKFLMARSO	WWSPFLHDSO
BRSNFLMARSO	FTLDFLSU74E	JCVLFLSMDSO	MICCFLBBSO	PNCYFLCARSO	WWSPFLSHDSO
BYBHFLMADSO	FTLDFLWNSO	JCVLFLWCDSO	MLBRFLMADSO	PNCYFLMA04T	YNFNFLMARSO
CCBHFLAFRSO	FTPRFLMADSO	JPTRFLMADSO	MLTNFLRADSO	PNCYFLMADSO	YNTWFLMARSO
CCBHFLMADSO	GCSPLCNDSO	KYHGFLMARSO	MNDRFLAVDSO	PNSCFBLDSO	YULEFLMARSO
CDKYFLMARSO	GCVLFLMARSO	KYLRFLLSRSO	MNDRFLLODSO	PNSCFLPDSO	
CFLDFLMARSO	GENVFLMARSO	KYLRFLMARSO	MNDRFLWRSO	PNSCFLHCRSO	
CHPLFLJADSO	GLBRFLMCDSO	KYWSFLMADSO	MNSNFLMARSO	PNSCFLPBDSO	
CNTMFLLED51	GSVLFLMA01T	LKCYFLMADSO	MRTHFLVERSO	PNSCFLWA01T	
COCOFMLADSO	GSVLFLMADSO	LKMRFLHEDSO	MXVLFLMARSO	PNSCFLWADSO	
COCOFLMEDSO	GSVLFLMADS1	LYHNFLOHDSO	NDADFLACDSO	PNVDFLMADSO	
COCYFL13AMD	GSVLFLNW33E	MCNPFLMARSO	NDADFLBRDSO	PRRNFLMADSO	
CSCYFLBARSO	HAVNFLMADSO	MDBGFLPMDSO	NDADFLGG03T	PRSNFLFDRSO	
DBRYFLDLOSO	HBSDFLMADSO	MIAMFLAEDSO	NDADFLGGDSO	PTSLFLMADSO	
DBRYFLMARS1	HLNVFLMADS1	MIAMFLAERSO	NDADFLOLDSO	PTSLFLSOCGO	
DELDFLMADSO	HLWDFLHA45E	MIAMFLALDSO	NKLRFLMARSO	SBSTFLFRSO	
DLBHFLKPD5O	HLWDFLMADSO	MIAMFLAPDSO	NSBHFLMADSO	SBSTFLMADSO	
DLBHFLMA27E	HLWDFLPEDSO	MIAMFLBA85E	NWBYFLMARSO	SGKYFLMARSO	
DLBHFLMARSO	HLWDFLWHDSO	MIAMFLBCDSO	OKHLFLMARSO	SNFRFLMADSO	
DLSPFLMARSO	HMSTFLEARSO	MIAMFLBRDSO	OLTWFLNRSO	STAGFLBSRSO	
DNLNFLWMRSO	HMSTFLHMDSO	MIAMFLCADSO	ORLDFLAPDSO	STAGFLMADSO	
DRBHFLMADSO	HMSTFLNARSO	MIAMFLDBRS1	ORLDFLCLDSO	STAGFLSHRSO	
DYBHFLFNRSO	HTISFLMADSO	MIAMFLFLDSO	ORLDFLMA04T	STAGFLWGRSO	
DYBHFLMADSO	HWTHFLMARSO	MIAMFLGRDSO	ORLDFLMADS1	STRTFLMADSO	
DYBHFL0BDSO	ISLMFLMARSO	MIAMFLGRDS1	ORLDFLPCDSO	SYHSFLCCRSO	
DYBHFL0SR5O	JAY FLMARSO	MIAMFLHLDSO	ORLDFLPHDSO	TRENFLMARSO	
DYBHFLP001T	JCBHFLABRSO	MIAMFLICDSO	ORLDFLSADSO	TTVLFLMADSO	
DYBHFLP0DSO	JCBHFLMA24E	MIAMFLKEDSO	ORPKFLMADSO	VERNFLMARSO	
EGLLFLBGDSO	JCBHFLSPRSO	MIAMFLME32E	ORPKFLRWDSO	VRBHFLBERSO	
EGLLFLIHDSO	JCVLFLARDSO	MIAMFLMERSO	OVIDFLCADSO	VRBHFLMADSO	
EORNFLMARSO	JCVLFLBWD5O	MIAMFLNMDSO	PACEFLPVR5O	WELKFLMARSO	