

Ruth Nettles

100124-TX

From: Jahan Babadi [jahan@suntelusa.com]
Sent: Friday, March 12, 2010 6:41 PM
To: Filings@psc.state.fl.us
Subject: Sun-Tel Application for ETC Designation
Attachments: Sun-Tel USA Application for ETC.pdf

From: Jahan J. Babadi
To: Filings@psc.state.fl.us
Date: March 12, 2010
Subject: Sun-Tel Application for ETC Designation
Attachment: Sun-Tel ETC Designation Application (Including Transmittal & Attachments)

- The person responsible for this electronic filing is:

Jahan J. Babadi, President
 Sun-Tel USA, Inc.
 5921-2 University Blvd. W.
 Jacksonville, FL 32216
 Phone: (904) 731-9995
 Fax: (904) 731-1123
jahan@suntelusa.com

- New Docket
- Filed on Behalf of: Sun-Tel USA, Inc.
- Total Number of Pages: 17
- Name of Filing: Application of Sun-Tel USA, Inc. for Certification as an Eligible Telecommunications Carrier

COM _____
 APA _____
 ECR _____
 GCL _____
 RAD _____
 SSC _____
 ADM _____
 OPC _____
 CLK _____ *Nonay*

DOCUMENT NUMBER-DATE
 01754 MAR 15 2010
 FPSC-COMMISSION CLK

SUN-TEL USA, INC.
5921 University Blvd W. Suite 2
Jacksonville, FL 32216

March 12, 2010

VIA ELECTRONIC FILING
Ms. Ann Cole, Director
Commission Clerk
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

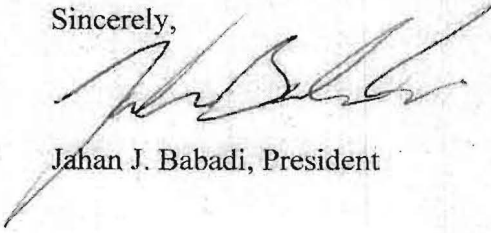
Re: Sun-Tel USA, Inc. Application for ETC Designation
Docket No. 100124-TX

Dear Ms. Cole:

Enclosed for filing on behalf of Sun-Tel USA, Inc. is an electronic version of Sun-Tel's Application for Certification as an Eligible Telecommunications Carrier.

Thank you for your assistance in processing this filing, and please feel free to contact the undersigned if there are any questions or further requirements.

Sincerely,



Jahan J. Babadi, President

Enclosure

Cc: Mr. Bob Casey, Public Utility Supervisor
Division of Competitive Markets

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

APPLICATION OF SUN-TEL USA, INC.
FOR CERTIFICATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

)
)
)

DOCKET NO. 100124-TX

APPLICATION FOR CERTIFICATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

Sun-Tel USA, Inc. ("Sun-Tel" or "Applicant"), pursuant to Sections 214(e)(2), 214(e)(6) and 254 of the Communications Act of 1934, as amended (the "Act")¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),² and Sections 364.10(2), and 364.025(5), Florida Statutes, hereby applies to the Florida Public Service Commission ("FPSC" or "Commission") for certification as an Eligible Telecommunications Carrier ("ETC") throughout the BellSouth/AT&T service territory in the State of Florida ("Designated Service Area") for the purpose of receiving federal Universal Service Fund ("FUSF") support in conjunction with providing Lifeline and Link-up services to customers in the Designated Service Area (the "Application"). A list of each rate center for which the Applicant is requesting ETC status in the State of Florida is attached hereto as Attachment "A". The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated in this Application, Sun-Tel satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Additionally, designation of Sun-Tel as an ETC in the Designated Service Area is consistent with and will serve the public interest, by extending affordable telecommunications services to Florida

¹ 47 U.S.C. Sections 214 (e)(2) and (6), and 47 U.S.C. Section 254
² 47 C.F.R. Sections 54.101-54.207.

DOCUMENT NUMBER-DATE
01754 MAR 15 9
FPSC-COMMISSION CLERK

consumers in the Designated Service Area. Upon a grant by the Commission of the ETC status requested in this Application, Sun-Tel will offer Lifeline and Link-Up services to qualified low income consumers in the Designated Service Area, as required by the rules and orders of this Commission.³ Accordingly, Sun-Tel respectfully requests that the Commission approve this Application and grant ETC status to Sun-Tel as sought hereby.

I. Background

1. Sun-Tel is a Florida Corporation⁴, and is authorized to conduct business as a domestic for-profit corporation in the State of Florida. Proof of filing of the Applicant's Articles of Incorporation and authority to transact business in the State of Florida is on file with this Commission and is incorporated herein by this reference. The principal business office of the Applicant is located at 5921-2 University Blvd. W.; Jacksonville, FL 32216.

2. The Applicant was granted certification by this Commission to operate as an Alternate Local Exchange Telecommunications Company ("ALEC") in Florida (Certificate Number 7126; Company Code TX330), pursuant to Order No. 99-1491-PAA-TX (FPSC Docket No. 990713-TX; issued August 3, 1999), which authorization became final and effective on August 30, 1999, pursuant to Order No. 99-1679-CO-TX (FPSC Docket No. 990713-TX; issued August 30, 1999). Pursuant to such authorization, the Applicant provides competitive local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through a commercial interconnection agreement with AT&T/BellSouth ("UNEs") that allows end-to-end switching and delivery of calls.

³ Rule 25-4.0665, Florida Administrative Code

⁴ Sun-Tel was organized in the State of Florida on March 12, 1999

3. As set forth in Section 214(e)(2) of the Act, the Commission "shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier for a service area designated by the State commission."⁵ Upon designation as an ETC, the carrier shall be eligible to receive universal service support in accordance with Section 254 of the Act.⁶

4. The requirements for designation as an ETC, set forth in Section 214(e)(1) of the Act, are that the carrier must:

- (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using media of general distribution.⁷

II. Sun-Tel Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area

5. Sun-Tel is a common carrier as that term is defined in the Act.⁸ The Applicant provides competitive local telecommunications services in the State of Florida, pursuant to Order Numbers 99-1491-PAA-TX and 99-1679-CO-TX (issued on August 3, 1999 and August 30, 1999, respectively; FPSC Docket No. 990713-TX), as referenced above.

6. Sun-Tel offers all of the supported services enumerated under Section 254(c) of the Act using facilities obtained as UNEs. Pursuant to FCC rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities

⁵ 47 U.S.C. Section 214(e)(2); *see* 47 C.F.R. Section 54.201(b) (FCC Rule citing Act's requirements).

⁶ 47 U.S.C. Section 214(e)(1)

⁷ *Id.*

⁸ *See* 47 U.S.C. Section 153 (10) ("the term 'common carrier' or 'carrier' means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy...").

or a combination of its own facilities and resale of another carrier's services.⁹ Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A) of the Act.

7. The services that are supported by Federal universal service support mechanisms under Section 254(c) of the Act are set forth in the FCC's rules (47 C.F.R. Sections 54.101(a)(1)-(9)), as follows:

(i) 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 that there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;

(ii) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;

(iii) 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, shortening call set-up time;

(iv) 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

⁹ Section 54.201(f) of the FCC's rules states: "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of the chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." 47 C.F.R. Section 54.201(f). The term "facilities" under Section 54.201 is defined 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 this part." 47 U.S.C. Section 54.20(e). Sun-Tel's use of UNEs meets this definition of "facilities".

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;

(v) 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. "911" is defined as a service that permits a telecommunications user, by dialing the three-digit code "911", to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;

(vi) 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 or completion, or both, of a telephone call;

(vii) 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;

(viii) 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; and

(ix) Toll limitation for qualifying low income customers.

8. Upon certification as an ETC, Sun-Tel 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, as required by FCC Rules.¹⁰

9. Applicant will advertise the availability of the above-listed services and the charges for such services in the Designated Service Area, using media of general distribution, as required by FCC rules.¹¹

III. Area for which ETC Certification is Requested

10. Sun-Tel has served and will continue to serve the exchanges where it leases UNES or resells the services of the non-rural telephone companies in the State of Florida. Sun-Tel does not seek certification as an ETC in any areas served by rural incumbent local exchange telephone companies in Florida, nor is Sun-Tel requesting certification as an ETC to provide service in any tribal areas within the State of Florida. As referenced in the first paragraph above, Applicant is seeking ETC designation in the Designated Service Area for those exchanges listed on Attachment "A" hereto.

¹⁰ See 47 C.F.R. Sections 54.401-54.417; 54.405(b) & 54.411(d)

¹¹ See 47 C.R.R. Section 54.201(d)(2)

IV. Granting Sun-Tel's Application Will Serve the Public Interest

11. Congress requires that the Commission grant competitive ETC applications in non-rural areas.¹² No specific public interest test is mentioned in the applicable statute, in contrast to those areas served by rural telephone companies.¹³ As such, the Act provides that the Commission "shall" designate Sun-Tel as an ETC upon finding that the company meets the nine-item listing of services referenced under paragraph 7 above, and that the Applicant agrees to advertise the supported services throughout the Designated Service Area. Nonetheless, it should be recognized by the Commission as a factual and policy matter that designation of Sun-Tel as an ETC will serve the public interest.

12. A primary goal of the Telecommunications Act of 1996, in amending the Communications Act of 1934, was to "promote competition and reduce regulation... [to foster] lower prices and higher quality services...and encourage the deployment of new telecommunications technologies."¹⁴ Moreover, Florida law has recognized and embraced these same principles and policies, stating: "The Legislature finds that the competitive provision of telecommunications services, including local exchange telecommunications service, is in the public interest and will provide customers with freedom of choice, encourage the introduction of new telecommunications service, encourage technological innovation, and encourage investment in telecommunications infrastructure."¹⁵ Granting ETC status to Sun-Tel will allow the Applicant to obtain FUSF support, thus extending the availability and benefits of competitive telecommunications services to more consumers and thereby enhancing the overall value of the public switched telephone network to all users in Florida, while also fostering innovative

¹² See 47 U.S.C. Section 214(e)(2).

¹³ See *Id.*

¹⁴ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 stat. 56, 56 (1996).

¹⁵ Section 364.01(3), Florida Statutes.

telecommunications services at competitive prices to consumers within the Designated Service Area.

13. Upon approval of the instant Application, Sun-Tel will announce and advertise the availability of ETC based telecommunications services to consumers in the Designated Service Area in Florida and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for such services. Accordingly, more low-income Florida citizens will be made aware of the opportunities afforded to them under the Lifeline and Link-Up programs and will be able to take advantage of those cost saving opportunities by subscribing to Sun-Tel's service.

14. Sun-Tel acknowledges that it will, as may be necessary, serve as a provider of last resort and thereby provide universal telephone service as an ETC in its Designated Service Area.

15. Applicant will provide equal access if all other ETCs in the Designated Service Area relinquish their ETC designations, pursuant to Section 214(e) of the Telecommunications Act of 1996. The FCC's ETC eligibility requirements order¹⁶ does not impose a general equal access requirement upon ETC applicants at this time, but instead suggests that applicants acknowledge that an ETC applicant may in the future be required to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within such area. Applicant expressly acknowledges this potential and will abide by the requirement should it be activated in the future. Applicant is willing to sign an affidavit attesting to its critical responsibilities regarding carrier of last resort obligations.

¹⁶ *In the Matter of Federal State Joint Board on Universal Service*, Report and Order FCC 05-46; CC Docket No. 96-45; adopted 2/25/05, released 03/17/05 ("FCC ETC Order")

16. Under FCC guidelines, an ETC applicant must submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed Designated Service Area. However, the FCC has waived this requirement for applicants whose requested ETC service territory would qualify it to receive no "high cost" support, but only "low income" FUSF support. Based upon (a) Sun-Tel's instant request seeking ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers and (b) the fact that the requested Designated Service Area includes no territories served by rural incumbent local exchange telephone company's ("ILECs"), submission of a Five-Year Network Improvement Plan is not required at this time, and none is included with this Application.

17. Recognizing that Lifeline and Link-Up support is designed to reduce the installation charges and monthly cost of telecommunications services for eligible low income consumers, and is distributed on a per-customer basis in a manner that is reflected directly in the price that eligible consumers pay for service, Applicant certifies that all support received by the carrier will be used to provide Lifeline and Link-Up services to consumers, thus promoting the availability of affordable telephone service for low income citizens in the Designate Service Area of Florida, consistent with and in furtherance of important and well recognized public interest goals.

18. Applicant offers a local usage plan comparable to the one offered by the ILEC in the Designated Service Area.

19. Pursuant to FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. (47 C.F.R. Section

54.202(a)(3); FCC ETC Order *at* Paragraph 28) Applicant certifies that it will satisfy all such standards. As part of its certification requirements for providing competitive local exchange services in Florida, Applicant must abide by the service quality and consumer protection rules of this Commission. In addition, Applicant commits to reporting information on numbers of consumer complaints per 1,000 lines served on an annual basis, consistent with the requirements set forth in the FCC ETC Order. Applicant further hereby commits to compliance with all such applicable state and federal requirements related to consumer protection and service quality standards.

20. Pursuant to FCC guidelines, an ETC applicant must demonstrate its ability to remain functional in emergency situations. (47 C.F.R. Section 54.202(a)(2); FCC ETC Order *at* Paragraph 25) Since Applicant is providing service to its customers through the use of ILEC leased facilities (UNEs), this arrangement allows Applicant to provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILEC to its own subscribers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability to manage traffic spikes during emergency situations. These facts satisfy the FCC's requirement to demonstrate Applicant's ability to maintain adequate service functionality in emergency circumstances.

21. FCC guidelines require an ETC applicant to commit to providing service throughout its proposed designated service area to all customers making a reasonable request for such service. (FCC ETC Order *at* Paragraph 22; 47 C.F.R. Section 54.202(a)(1)(i)) Applicant hereby commits to providing service throughout its proposed ETC Designated Service Area to all customers making a reasonable request for service, as required by such guidelines.

22. To the best of Applicant's knowledge and belief, its account is current with the FCC in regards to regulatory fees; and its account is current with the Universal Service Administrative Company ("USAC") with respect to universal service fund contributions. Similarly, to the best of Applicant's knowledge and belief, its account is current with this Commission in regards to FPSC Regulatory Assessment Fees. The Applicant is aware that there may be an audit of the use of universal service funds and that the ETC designation is reviewed annually by the state commissions, including the FPSC. To the best of Applicant's knowledge and belief, it has no outstanding complaints either at the FCC or before this Commission.

23. Applicant has completed and submits herewith, as Attachment "B", the Applicant Certification form required by this Commission for applicants seeking ETC designation in Florida.

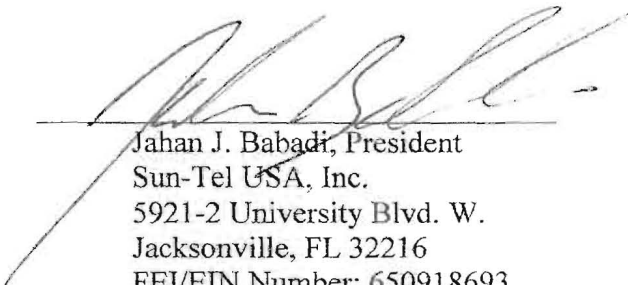
V. Legal Authority

This Application is filed pursuant to 47 U.S.C. Sections 151 *et seq.* and Sections 364.10(2) and 364.025(5), Florida Statutes.

VI. Relief Requested

Based upon the foregoing, Sun-Tel respectfully requests that this Commission grant its Application and designate the Applicant as an ETC for the Designated Service Area in Florida.

Respectfully submitted,



Jahan J. Babadi, President
Sun-Tel USA, Inc.
5921-2 University Blvd. W.
Jacksonville, FL 32216
FEI/EIN Number: 650918693
Phone: (904) 731-9995
Fax: (904) 731-1123
jahan@suntelusa.com

ATTACHMENT "A"
Rate Centers

**Florida Wire Centers
(8 Digit CILLI)**

BCRTFLBT	BCRTFLSA	JPTRFLMA
BCRTFLMA	BLGLFLMA	KYLRFLLS
DYBHFLFN	BYBHFLMA	KYLRFLMA
FTLDFL92	CCBHFLAF	LKMRFLHE
FTLDFLCR	CCBHFLMA	
FTLDFLCY	COCOFLMA	
FTLDFLMR	COCOFLME	
FTLDFLOA	DBRYFLDL	
FTLDFLSF	DBRYFLMA	
FTLDFLSG	DELDFLMA	
FTLDFLSU	DLBHFLKP	
HLWDFLHA	DLBHFLMA	
HLWDFLMA	DRBHFLMA	
JCBHFLSP	DYBHFLMA	
JCVLFLCL	DYBHFLQB	
JCVLFLFC	DYBHFLQS	
JCVLFLJT	DYBHFLPO	
JCVLFLSM	EGLLFLBG	
KYWSFLMA	EGLLFLIH	
MIAMFLAE	FLBHFLMA	
MIAMFLAP	FRBHFLFP	
MIAMFLBA	FTLDFLJA	
MIAMFLBC	FTLDFLPL	
MIAMFLBR	FTLDFLWN	
MIAMFLDB	GLBRFLMC	
MIAMFLFL	GSVLFLMA	
MIAMFLGR	GSVLFLNW	
MIAMFLIC	HBSDFLMA	
MIAMFLKE	HLWDFLPE	
MIAMFLME	HLWDFLWH	
MIAMFLNM	HTISFLMA	
MIAMFLPB	ISLMFLMA	
MIAMFLPL	JCBHFLAB	
MIAMFLWD	JCBHFLMA	
MIAMFLWM	JCVLFLAR	
NDADFLAC	JCVLFLBW	
NDADFLOL	JCVLFLIA	
ORLDFLMA	JCVLFLNO	
PMBHFLNP	JCVLFLRV	
PMBHFLTA	JCVLFLSJ	
WPBHFLAN	JCVLFLWC	

ATTACHMENT "B"

APPLICANT CERTIFICATION

State of Florida

County of Duval

My name is Jahan J. Babadi, I am employed by Sun-Tel USA, Inc., located at 5921-2 University Blvd. W.; Jacksonville, FL 32216, as its President. 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 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 status 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 status.
4. Company understands that if its petition for ETC status is approved, it will be for limited ETC status to provide Link-Up, Lifeline, and toll-limitation service only, and the Company will be eligible only to receive low-income support from the Universal Service Fund.
5. 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 using access lines obtained as wholesale local platform lines (formerly UNE lines) from another carrier. The Company shall not apply to USAC for reimbursement of Link-Up and Lifeline access lines obtained from an underlying carrier which already receives a Lifeline and/or Link-Up credit provided by the underlying carrier.

6. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers.
7. 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.
8. Company agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC to:
Florida Public Service Commission

Division of Regulatory Compliance, Market Practices Section

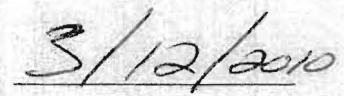
2540 Shumard Oak Drive

Tallahassee, Florida 32399-0850
9. Company understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bill, \$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



Date

Jahan J. Babadi

Printed Name

Business Address:

5921-2 University Blvd. W.

Jacksonville, FL 32216

State of Florida

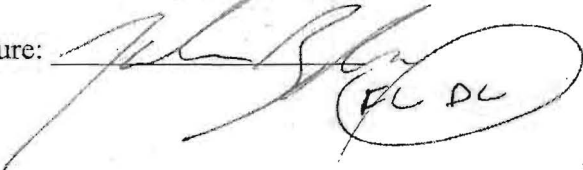
County of Duval

Certification:


I, Jahan J. Babadi, certify that I am the company officer responsible for preparing this Application by Sun-Tel USA, Inc. for Certification as an Eligible Telecommunications Carrier in Florida, and that I have examined/formulated the foregoing Application. To the best of my knowledge, information, and belief, all statements of fact contained in said Application are correct statements of the business and affairs of the Applicant with respect to each and every matter set forth therein.

Dated: 3/12/2010

Telephone Number: (904) 731-9995

Signature: 

Subscribed and sworn to before me, a Notary Public in
And for the State of Florida above named, this 12th day
Of MARCH, 2010.


(Notary Public-Signature)



(Seal)

My Commission Expires: 1/12/2014