

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Petition of ) Application No. NUSF-77  
the Nebraska Telecommunications ) Progression Order No. 3  
Association for Investigation )  
and Review of Processes and ) ORDER SEEKING FURTHER  
Procedures Regarding the NUSF. ) COMMENTS AND SETTING HEARING  
)  
) Entered: June 14, 2011

BY THE COMMISSION:

***Background***

On January 14, 2010, the Nebraska Telecommunications Association (NTA) filed a petition for investigation and review of the Nebraska Universal Service Fund (NUSF) processes and procedures. On March 8, 2010 the Commission held a planning conference to discuss a timeline for the submission and development of issues to be considered for possible inclusion in this investigation. The Commission requested that a listing of issues be filed by interested parties. Those issues were discussed at a workshop held on June 24, 2010. The issues of many of the commenters focused on establishing a program within the NUSF that would support broadband deployment in Nebraska. The Commission sought comments on how a broadband pilot program could be structured.

We invited interested parties to comment on whether the Commission should implement a broadband pilot program within the NUSF, and if so, how the broadband pilot program should be administered.

In addition, we sought comment on the timing of the creation of a pilot or long-term broadband support mechanism. We asked the interested parties to comment on whether the Commission should wait for an FCC determination on broadband support at the federal level. We recognized that FCC has several dockets pending to reform universal service and the intercarrier compensation mechanisms and that the FCC is considering whether to add broadband services to the list of services supported by the Federal USF. In addition, the FCC is considering the treatment of Internet services in a Third Way Notice of Inquiry. In light of the unanswered questions at the federal level, the Commission solicited comments regarding how it should coordinate its NUSF policies with federal actions to promote broadband availability in Nebraska.

We also sought comment on how the program should be structured overall. The Commission asked parties to identify the

policy goals the Commission should establish. The Commission sought comments on how the pilot program should be funded. The Commission asked for comments on how it should size the pilot program. The Commission sought comment on who should be eligible to apply for and receive funds or grants from the broadband pilot program.

In addition, the Commission sought comment on the definition of "broadband" for the purpose of this program. The Commission asked how "broadband" should be defined and whether it should establish the minimum download and upload speeds.

Finally, the Commission sought comments relative to how to determine unserved and underserved areas. The Commission questioned whether it should use data from the broadband mapping project to determine unserved/underserved areas. The Commission also sought comments on how broadband investment should be reported.

#### ***Comments and Reply Comments Filed***

Citizens Telecommunications Company of Nebraska d/b/a Frontier Communications of Nebraska ("Frontier") commented that it would be wise for the Commission to wait for the FCC to act prior to taking the step to support broadband. Frontier was concerned that any plan adopted by the Commission would not be compatible with federal decisions. Frontier urged the Commission to delay implementation of a broadband pilot program until after carriers have had the opportunity to study any federal plan adopted by the FCC.

Cox Nebraska Telcom, LLC ("Cox") supported the establishment of a broadband pilot program and advocated that it be structured similar to the dedicated wireless fund program. Cox recommended that all carriers should be eligible to participate. Cox also recommended that funding be prioritized in a manner which benefited the greatest number of subscribers per cost of implementation. Cox recommended the Commission prioritize funding in the unserved and underserved areas similar to the wireless fund program. Cox urged the Commission to adopt the definition for broadband which is presently being considered by the FCC. That definition is 4 mbps download speed and 1 mbps upload speed. The definition adopted by the Commission should be reviewed annually or on a bi-annual basis in order to ensure that it remains current. Finally, Cox recommended that the Commission keep in mind that broadband prices may be a barrier to some Nebraskans; accordingly, the Commission should consider

making broadband more affordable to consumers residing in both urban and rural areas.

United Telephone Company of the West d/b/a CenturyLink commented that although it believes the Commission should not get too far ahead of the FCC's efforts in this area, as long as the Commission's policy goals for using NUSF support for broadband are consistent with the FCC's goals in the National Broadband Plan, there is no reason why the Commission cannot move forward with its own plan. CenturyLink stated that 85 percent of its lines are broadband enabled. The last 15 percent are the most expensive lines to deploy broadband service. Low population density in its service territory makes broadband service expensive to deploy. CenturyLink proposes the Commission define an area as "unserved" if the area does not have access to broadband at a download speed of 1.5 Mbps from any wireline provider. "Underserved" should be defined as any area of the state that has broadband service availability only at a download speed of 1.5 Mbps or less from any wireline provider.

CenturyLink also recommended that the Commission establish a broadband program similar to the dedicated wireless fund program, where a carrier may apply for funding to expand broadband to an unserved or underserved area of the state. Any carrier receiving funding should be required to provide voice (including Lifeline) and broadband service to any customer within the proposed service area. Once funds are granted, the Commission should require the carrier to provide adequate documentation to show that the funds are being used for the intended purpose.

Finally, CenturyLink recommended that the Commission develop a funding mechanism longer term that offsets the ongoing costs of transport and maintenance of broadband networks in high-cost areas of the state. The Commission should recognize the ongoing high cost of transporting traffic long distances as well as the cost of maintaining and operating the broadband network as utilization increases.

CTIA-the Wireless Association questioned the jurisdictional basis for NUSF support of broadband. Instead, CTIA encouraged the Commission to prepare a sound foundation for the policies established by the National Broadband Plan through additional reform of intercarrier compensation including intrastate access rates. To the extent that the Commission determines it has jurisdiction to support broadband, its support should be competitively neutral across broadband platforms.

The Nebraska Telecommunications Association ("NTA") commented that it was too early in the process to address specific pilot program implementation parameters. Conceptually, the NTA supports the idea of funding broadband deployment through the NUSF. However, the NTA raised concerns about some of the proceedings pending on the federal level and how the outcome could potentially impact their position relative to state policy.

Qwest Corporation ("Qwest") agreed that a broadband pilot program should be established. According to Qwest, distributions should be made through a competitively neutral process and any recipient of broadband pilot program fund should be subject to reporting requirements. Qwest states that a pilot program could begin before final FCC action, but the Commission should await FCC action before implementing a permanent or long-term program. Qwest support using 1.5 Mbps download and 896 kbps upload as target speeds and using the broadband mapping project for determining unserved and underserved areas.

The Rural Independent Companies (RIC) believed that the Commission should focus on evaluating whether the high-cost program should be transitioned to explicitly support broadband deployment in high-cost rural areas of the state.

However, with respect to a broadband pilot program, RIC had several suggestions. First, RIC recommended that any pilot program be administered as a grant program in which applications are submitted, evaluated and approved by the Commission. The Commission should have continued oversight and subject the grantees to its audit requirements. In addition, RIC recommended that any carrier which has been designed as a Nebraska Eligible Telecommunications Carrier by a Commission order should be eligible to apply for funding from a pilot program. RIC also suggested the Commission gather data to determine "reasonably comparable" broadband services and speeds. The Commission should continually evaluate broadband speeds and metrics at least every three years. Finally, RIC recommended that the Commission define unserved areas as those areas that lack access to broadband service at speeds at or below a specific and actual speed tier utilized in the broadband mapping project.

In its reply comments, RIC recommended the Commission should ensure that only high-cost areas of the state that lack access to advanced services and do not meet the National Broadband Availability Target should be provided highest priority for funding from the pilot program. The Commission should fill in any gaps left by the accelerated funding expected

from the Connect America Fund or the Mobility Fund. RIC also recommended that only high-cost areas that do not have access to broadband service that meets the reasonable comparability standard should be given priority funding from a pilot program if such areas are not eligible for support from the NUSF high-cost program and have not received FCC broadband funding. RIC also recommended that the Commission discontinue the current NUSF Wireless program and redirect all or a portion of the funding for the NUSF Wireless Program into the broadband pilot program.

The Rural Telecommunications Coalition of Nebraska ("RTCN") suggested that until the Commission knows the full extent of its authority with regard to broadband support it may be premature to expend resources to implement a broadband support program. However, RTCN supports the creation and implementation of a broadband support program. The RTCN advocated for a policy that prohibits the use of funding that is currently designated for the high-cost program as a source of funding for the broadband program. RTCN asserted that the definition and speed requirements for both rural and urban areas must be reasonably comparable and must account for the policy objective to not only preserve universal service but also to advance universal service.

Verizon commented that the Commission should wait until more is known about how the FCC decides to implement the National Broadband Plan. According to Verizon, the Commission should not embark on premature state-level initiatives that might undermine federal objectives. In addition, Verizon stated the Commission should remain cognizant that an area that is unserved today may well have broadband soon. Thus, any pilot program should not unnecessarily devote resources to funding deployment in areas that are already slated for near-term fourth-generation (4G) wireless broadband network expansion. Verizon supported the National Broadband Plan recommendation that financial support should be made available only in geographic areas currently lacking broadband service and where private investment in broadband deployment is unlikely to occur.

Verizon also recommended the Commission use the same technical standard that the FCC is considering; that is an availability target of 4 Mbps of actual download speed and 1 Mbps of actual upload speed. If the FCC later revisits this speed target, the Commission should do the same.

In its reply comments Verizon stated that there was consensus on several principles. The parties agreed that the program should be narrowly targeted, carefully controlled and

subject to appropriate oversight and audit. Verizon also stated there was consensus that the Commission should use the result of the ongoing mapping projects to help identify areas that may require support.

Windstream Nebraska, Inc., Windstream Systems of the Midwest Inc. and Windstream of the Midwest, Inc. (collectively "Windstream") recommended the Commission consider removal of the earnings constraint in the NUSF high-cost support mechanism. In the alternative, Windstream recommended modifications to the current NUSF-EARN filing requirements which would permit companies to provide earnings at the sub-wire center level.<sup>1</sup>

#### O P I N I O N   A N D   F I N D I N G S

The Commission finds that making NUSF support available for broadband deployment will complement the Commission's existing goal to support networks that provide voice service as well as advanced services. As the National Broadband Plan (NEBP) recognized, closing the existing broadband availability gap is a state and federal responsibility which will require both state and federal financial support.

The Commission agrees with a number of commenters that it should proceed cautiously, taking incremental steps which preserve the best aspects of the mechanisms the Commission has in place, while advancing state universal service policy to accelerate broadband deployment. We recognize that we do not know when and how federal universal service reform will be implemented. Reform of this magnitude will undoubtedly require a reasonable transition period, both at a state and federal level. We further recognize that the Commission will need to adapt its policies to complement changes adopted by the FCC relative to the short-term and long-term Connect America Fund (CAF).

The Commission's primary objective, however, is to ensure that Nebraska consumers realize the benefits of universal service in the form of reasonably comparable access and rates for telecommunications and advanced services. The longer the Commission waits to implement changes to recognize the importance of broadband capable networks, the further behind Nebraska consumers will be. Accordingly, the Commission moves this docket forward to seek comments on Year One of the Nebraska

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<sup>1</sup> The Commission sought comments on Windstream's proposal separately in this proceeding. See *In the Matter of the Petition of the Nebraska Telecommunications Association for Investigation and Review of Process and Procedures Regarding the NUSF*, Progression Order No. 2 (February 1, 2011).

Broadband Pilot (NEBP) program with the goal of having a first round of broadband grant funds available in calendar year 2012. Accordingly, the Commission hereby releases its proposal for Year One of the Broadband Pilot Program for public comment. Interested parties are invited to comment on the proposed ideas described below and topics germane to Year One of the Nebraska Broadband Pilot Program.

#### **COMMISSION'S PROPOSAL FOR YEAR ONE OF THE BROADBAND PILOT PROGRAM**

The Commission agrees with the commenters to the extent that, at least initially, the NEBP program should be administered as a grant program in which applications are submitted, evaluated, and approved by the Commission and grantees are subject to oversight and audit processes, similar to the Commission's Dedicated Wireless Fund program. The Commission believes that specific and targeted broadband support to unserved and underserved areas will be the best method to close the broadband availability gap in the near term.

Over time,<sup>2</sup> most likely during Year One of the NEBP program, the Commission will seek further comments on transitioning the limited pilot program to a distribution process which will create incentives for carriers to meet broadband deployment objectives, taking into consideration operation and maintenance of high-cost broadband capable networks, and directing funding to carriers which have met broadband deployment objectives. At that time, we will seek comments on the long-term objectives of the high-cost distribution mechanism as well as the Dedicated Wireless Fund. We ask parties to focus on commenting on the proposals pertaining to Year One of the NEBP program with the knowledge that the Commission will continue to seek comments to the long-term goals of the NUSF.

In addition, we note that some states have already taken explicit action to fund broadband deployment. In its NPRM, the FCC recognized California's efforts to accelerate broadband availability through its California Advanced Services Fund (CASF)<sup>3</sup>. Idaho has also developed a rural broadband investment

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<sup>2</sup> Depending upon the timing of FCC reform and taking into consideration comments from the interested parties, this transition process may occur before or after FCC universal service and intercarrier compensation reform.

<sup>3</sup> See *Order Instituting Rulemaking into the Review of the California High Cost Fund B Program*, Interim Opinion Implementing California Advanced Services Fund, Rulemaking 06-06-028(CA PUC rel. December 20, 2007).

program (IRBIP) based upon statutory authority to approve tax credits for certain broadband projects.<sup>4</sup> New York has been recognized for their role in promoting broadband through the Universal Broadband Access Grant Program.<sup>5</sup> The Commission has considered other states' actions and has incorporated ideas from other states into this Order. For interested parties that offer services in a state which has an explicit broadband support mechanism, we invite comments on which aspects of these programs are successful and which aspects of these programs have proven unsuccessful at closing the gaps relative to broadband availability.

For Year One of the NEBP program, the Commission proposes to make \$4 million available for broadband grants. The Commission believes that \$4 million dedicated for this purpose will be useful as a starting point to accelerate broadband deployment while maintaining sufficient levels of high-cost program funding. The amount available for the NEBP program in future years will be determined after the Commission has had the ability to assess the program, the number of applications submitted, the need for broadband funding, and the availability of NUSF support. Accordingly, we seek comment on this initial amount for the NEBP program.

Some of the parties commented that the Commission should re-allocate funding from the Dedicated Wireless Fund program to the NEBP program for Year One support. We have instead begun a path to transition the Dedicated Wireless Fund program to a wireless broadband program by directing the staff to give greater weight to wireless broadband deployment when determining its recommended criteria for Dedicated Wireless Fund support.<sup>6</sup> We seek comment on that course of action for the near term. We propose instead to designate available NUSF monies, not distributed through the high-cost mechanism for Year One of the NEBP; to the extent necessary, additional NUSF monies will be assigned from the high-cost funding mechanism of the NUSF to make \$4 million available for the NEBP program in Year One.

In the long term, as NUSF resources are limited, we will be seeking comment on whether the Commission should provide

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<sup>4</sup> See Idaho Code § 63-3029I.

<sup>5</sup> See New York Universal Broadband Access Grant Program 2007-2008 Request for Proposals CIO/OFT 001-2007 (CIO/OFT rel. December 20, 2007).

<sup>6</sup> See *In the Matter of the Nebraska Public Service Commission, on its own motion, seeking to implement policies and procedures related to providing dedicated universal service support for wireless telecommunications services*, Progression Order No. 7 (May 24, 2011).



broadband funding to only one network in a given area and how that provider should be determined. We note that a number of entities including the Federal-State Joint Board on Universal Service emphasize the importance of having both a wireline and wireless alternative for broadband. We may await federal reform before taking on this issue, but we invite the parties to comment on the importance of providing funding for both wireline and wireless broadband service.

### ***Eligible Companies***

The Commission proposes to make all Facilities-Based Internet Service Providers (ISPs) and telecommunications carriers eligible for Nebraska Eligible Carrier Designation for NEBP program support. This would include regulated wireline, wireless and unregulated communications providers as eligible assuming the carrier meets the Commission designation requirements.

In order to be designated as an eligible provider for NEBP program support, an applicant must

- (1) Commit to offer the supported broadband service upon completion of the deployment to all households within the area defined by the application, for a minimum period of 5 years;
- (2) Commit to offer a voice grade service to customers within the service area of the broadband deployment;
- (3) Commit to offer access to emergency services;
- (4) Commit to using broadband support only for the purposes intended and which have been approved by the Commission through the application process;
- (5) Commit to offering the voice and broadband service at reasonably comparable rates for comparable services in urban areas; and
- (6) Commit to fulfilling reporting and audit requirements adopted by the Commission for oversight of the NEBP program.

***Application Requirements***

Applicants should be required to submit the following information to the Commission for each proposed broadband project:

- (1) An electronic map<sup>7</sup> which depicts the applicant's current broadband infrastructure and service area.
- (2) A description of the proposed broadband project plan for which NEBP funding is being requested including download and upload speed capabilities which can be provided using the proposed infrastructure. Minimum speed standards should be 768kbps download and 200 kbps upload;
- (3) An electronic map<sup>8</sup> of all geographic locations where broadband facilities will be deployed. Boundaries of the specific area to be served by the project along with a demonstration that the area is currently unserved or underserved;
- (4) An estimate of the number of potential new broadband subscribers;
- (5) A schedule for broadband deployment with commitment to complete the build-out within 24 months of approval of the application. The schedule should describe all milestones and the estimated date by which the milestones will be completed;
- (6) A proposed budget, in electronic format,<sup>9</sup> for the project in Excel format with a detailed breakdown of the cost elements and a depreciation schedule showing the life of the investment;
- (7) Proposed retail pricing for the new broadband service(s) to be offered;

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<sup>7</sup> Electronic maps shall be submitted in an editable, ESRI compatible format with all underlying data included and available.

<sup>8</sup> Electronic maps shall be submitted in the format provided in n. 7 *supra*.

<sup>9</sup> A proposed budget shall be submitted in an editable, Microsoft Excel format with all underlying data included and available.

- (8) A description of the applicant's commitment to offer broadband services to all households within the service area of the project;
- (9) A description of the applicant's commitment to provide broadband data to the Commission and its vendors for the duration of the State Broadband Data and Development (SBDD) program so that this broadband coverage area can be depicted on the Commission's state broadband data inventory map and on the National Telecommunications and Information Administration's (NTIA's) national broadband map; and
- (10) A description of the applicant's financial qualifications, which may be filed on a confidential basis, to meet the commitments made in the application.

All confidential materials should be clearly marked. A redacted copy of the application should be filed for public dissemination.

### ***Review Process***

The Commission will publish notice of the applications consistent with its Rules of Commission Procedure. Interested parties may file Protests or Petitions of Intervention where an interest has been demonstrated in the applicable time frame pursuant to the Commission's rules. The Commission staff may issue data requests to elicit more information from applicants. In the event that a hearing is required, the Commission may consolidate the hearings on all applications received in a given calendar year, where administratively convenient similar to its hearings on Dedicated Wireless Fund support.

The Commission proposes to review the applications received and make funding determinations based upon the extent that the areas are unserved or underserved, the retail price of the service to be offered, the cost per household, total number of households which will potentially be served, area density, and the strength of the applicant's commitments. In addition, the Commission proposes to request the staff to prioritize areas based on the factors below and the use of data collected through the broadband mapping project.

The Commission proposes to rank applications using the following criteria:

- Extent to which area is unserved or underserved, with an emphasis on providing broadband availability to the unserved areas first;
- Retail Rate per Mbps and Cost per Mbps per Household;
- Cost per Household;
- Project area density; and
- Total Households.

We seek comment on the proposed criteria to rank applications. We also invite commenters to suggest additional criteria which should be used when ranking or considering applications for approval.

In addition, the Commission seeks comment on whether applications for NEBP program support should be considered on an "all or nothing" basis. Could the Commission consider reviewing and approving NEBP program applications on a census block basis? Should the Commission consider NEBP fund applications segregable on some other basis? In the past, when considering Dedicated Wireless Fund program applications, the Commission has granted portions and denied portions of the applications received. The Commission has approved projects for the construction of certain wireless towers but has denied funding for other towers due to limitations in available funding. Because of the nature of the projects that will be considered for NEBP program support, it may be difficult for the Commission to determine whether project plans could be partially approved or denied. Should we require the NEBP applicants to offer alternative project plans in the event that the Commission is not able or is not willing to support the entire project submitted for approval?

#### ***Audit and Verification Requirements***

We propose to require recipients of NEBP program funds to submit invoices prior to the receipt of NUSF support similar to the process used by the Commission for the Dedicated Wireless Fund support. Recipients of NEBP program support may submit invoices upon partial completion of certain milestones as designated in the approved application or upon total completion of the approved project(s). Recipients may be required to submit additional information for verification of the use of NEBP program support. Where deemed necessary and appropriate the Commission may require an audit of NEBP program support. The

Commission proposes not to require audits as a matter of course for each approved project. However, in some cases an audit may be deemed appropriate to ensure that funds are spent in accordance with Commission orders and requirements.

### ***Additional Considerations***

We further recognize that a number of entities received stimulus funding through National Telecommunications and Information Administration (NTIA) and Rural Utilities Service (RUS) grants and loans. Through its work on the NTIA broadband mapping and planning project, the Commission has been made aware of the projects being funded and the areas in which broadband will be deployed. With that in mind, the Commission invites parties to comment further on how the Commission should consider projects that are currently being funded or where other broadband projects are being planned. How could the Commission determine what these projects are? How should the Commission distinguish between projects that would not be completed but for additional broadband support from projects that would be completed without support? Would an affidavit process be sufficient? If not, what additional information should be required?

The Commission also seeks comment on whether to require financial match commitment from the applicants. Should the Commission require applicants to provide a commitment to match NEBP program support and if so, what should the match percentage be? In the alternative, should the Commission weigh an applicant's match commitment as one of the factors when determining which projects it will support? If so, what weight should be given? If the Commission adopts a match component, how should the value of the match be validated?

### ***Comment Period***

Comments responsive to this proposal must be filed on or before **July 15, 2011**. Commenters should file one (1) paper copy and one (1) electronic copy of their Comments with the Commission. Reply Comments may be filed on or before **July 29, 2011**. Electronic copies should be sent to [Sue.Vanicek@nebraska.gov](mailto:Sue.Vanicek@nebraska.gov) and [Brandy.Zierott@nebraska.gov](mailto:Brandy.Zierott@nebraska.gov). An electronic copy of the Comments and Reply Comments must also be served on all other interested parties on the Commission's service list.

***Commission Hearing***

A Hearing on this matter will be held on **August 10, 2011** at **10:00 a.m.** central time in the Commission Hearing Room, 300 The Atrium Building, 1200 N Street, Lincoln, Nebraska 68508.

If auxiliary aids or reasonable accommodations are needed for attendance at the meeting, please call the Commission at (402) 471-3101. For people with hearing/speech impairments, please call the Commission at (402) 471-0213 (TDD) or the Nebraska Relay System at (800) 833-7352(TDD) or (800) 833-0920 (Voice). Advance notice of at least seven (7) days is needed when requesting an interpreter.

O R D E R

IT IS THEREFORE ORDERED by the Nebraska Public Service Commission that Comments responsive to the proposals described herein may be filed on or before **July 15, 2011** and Reply Comments may be filed on or before **July 29, 2011** as provided above.

IT IS FURTHER ORDERED that a Hearing on this matter will be held on **August 10, 2011** at 10:00 a.m. in the Commission Hearing Room, 300 The Atrium Building, 1200 N Street, Lincoln, Nebraska 68508.

MADE AND ENTERED at Lincoln, Nebraska this 14th day of June, 2011.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:

Chairman

ATTEST:

Executive Director

SECRETARY'S RECORD, NEBRASKA PUBLIC SERVICE COMMISSION

Application No. NUSF-77

Page 14

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O R D E R

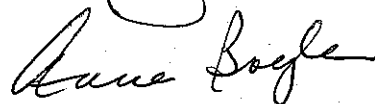
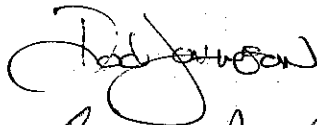
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MADE AND ENTERED at Lincoln, Nebraska this 14th day of June, 2011.

NEBRASKA PUBLIC SERVICE COMMISSION

COMMISSIONERS CONCURRING:



//s//Frank E. Landis

//s//Tim Schram



Chairman

ATTEST:



Executive Director