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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| Application of Bresnan Broadband of Utah, LLC For a Certificate of Public Convenience and Necessity to Operate as a Competitive Local Exchange Carrier in Utah | Docket No. 07-2476-01 Posthearing Brief of the Utah Division of Public Utilities in Support of Application by Bresnan Broadband |
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The following is a Memorandum by the Division of Public Utilities (DPU) in support of the Application by Bresnan Broadband of Utah, LLC (Bresnan) for a Certificate of Public Convenience and Necessity (CPCN) to operate as a Competitive Local Exchange Carrier (CLEC) in the Vernal exchange.

1. INTRODUCTION

Utah's Telecommunications Act, U.C.A. § 54-8b-1, et. seq., was passed in 1995. The Federal Telecommunications Act was passed in 1996. Both acts encourage competition. Since that time there have been no CPCNs issued by this Commission in an exchange of a rate of return regulated company. There are currently about 90 CLECs who have certificates in Qwest's service area. This proceeding provides the Commission the opportunity to permit a CLEC to enter an exchange of a rate of return regulated company that has more than 5,000 access lines.

UBTA/UBET and the URTA continue to oppose competition like Bresnan in the Vernal exchange. It is time to begin providing the citizens of exchanges like Vernal the opportunity to have competitive choice and the benefits of competition. With the overwhelming state and national policy supporting competition the DPU could see no reason for the Commission to deny the CPCN request by Bresnan. The effect on the State Universal Service Fund (USF) is manageable and should not serve as the bases for the denial of this CPCN Application.

2. OTHER THAN THE PUBLIC INTEREST ISSUES THERE IS NO SERIOUS DISPUTE THAT BRESNAN DOES NOT MEET THE REQUIREMENTS FOR A CERTIFICATE IN U.C.A. § 54-8b-2.1 AND R746-349.

First there is no doubt that Bresnan is a telecommunications corporation under U.C.A. § 54-8b-2(18) and is planning on offering public telecommunication services under U.C.A. § 54-8b-2(16) in all or part of a service territory of an Incumbent Local Exchange Carrier (ILEC) under state law. Also currently there is no Federal pre-emption exempting a company like Bresnan who offers switch local exchange service from state certificate requirements. Comcast is similarly situated to Bresnan and has a CPCN from this Commission. Under U.C.A. § 54-8b-2.1(2) the Commission shall issue a CPCN to a company like Bresnan if the Commission determines that the applicant has “sufficient technical, financial and managerial resources and abilities to provide the public telecommunications services applied for” and the issuance of the Certificate is in the public interest. Although the rural companies may make negative comments on Bresnan’s qualifications no evidence was presented by their witnesses on Bresnan’s technical, financial or managerial qualifications. The only evidence presented was through either Bresnan or through the review the DPU conducted for not only Bresnan but also for each CLEC application that has been received in this State. Bresnan is currently serving 82,000 telephone customers in Wyoming, Montana and Colorado. Bresnan has appropriately either provided or

asked for waivers of all information that any CLEC applicant provides to the Division. In this case the Division conducted a more in depth review of Bresnan than certificates issued in Qwest's area. The Division provided testimony that Bresnan has the technical, managerial and financial capabilities to provide service in both Vernal and, in a separate proceeding, in Cedar City. Therefore any comments or objections to Bresnan's qualifications should be given little weight and should not serve as the basis of a denial of the Certificate.

3. THE PUBLIC POLICY OF THE STATE ENCOURAGES COMPETITION AND THERE ARE NO STATUTORY RESTRICTIONS FOR EXCHANGES ABOVE 5,000 ACCESS LINES.

The state's actual prohibition allowing competition in rural areas was eliminated December 31, 1997.¹ That restriction never applied to exchanges above 5,000 access lines even with a rural rate of return regulated company. Under today's statutory scheme a CLEC requesting authority in Vernal is not treated differently statutorily from a CLEC requesting authority in Qwest's area. Any statutory restriction applies only in exchanges of less than 5,000-access lines.² The only difference in either the statute or rules is that Bresnan is seeking authority in an exchange of a company who receives state USF support and as a result of receiving that support is rate of return regulated.³ As a result there should be no reason why the policy declarations enumerated in U.C.A. § 54-8b-1 should not be equally applied to the Vernal exchange as they have been applied to Qwest. The main question for the Commission should be if because the ILEC receives state USF support would the objectives of universal service at affordable rates be achievable in Vernal and in the Uintah Basin even with competition by

¹ U.C.A. § 54-8b-2.1(1) Even at that time the restriction did not apply to exchanges above 5,000 access lines.

² Even though not required Bresnan has stated that it would accept a requirement that it offer public telecommunication services to any customer or class of customers requesting service in the Vernal exchange. U.C.A. § 54-8b-2.1(4).

³ Uintah Basin is a co-operative. Absent receiving state USF Uintah Basin would seek its rate increases under U.C.A. § 54-7-12(6) rather than the sections applicable to non co-operatives.

Bresnan. The DPU believes that the evidence supports a finding that the policy goals enumerated in Utah Code Ann. § 54-8b-1 including maintaining universal service at affordable rates can be achieved in Vernal even with competition by Bresnan.

Even with these policy declarations, Mr. Meredith and Mr. Hendershot argue that there would not be any public benefits to adding a second provider in Vernal. They argue that the draw against the state USF fund would increase without corresponding benefits to offset the increased costs to the fund.⁴ The DPU disagrees. Although it may not be as easy to provide a dollar and cents estimate of the benefits of competition as it is to provide a dollar and cents estimate of Uintah Basin's lost revenues or an estimate of the effect on the USF fund, the benefits of competition can be quantified in other way. First, if Bresnan has nothing to offer the citizens of the Vernal exchange no one will take the product and there will be no negative effect on the ILEC or the state USF fund.⁵ However, that is an unlikely scenario. Bresnan is offering a product that is currently not available. Therefore, customer choice for the citizens of Vernal is and of itself a positive benefit of competition. Mr. Coleman outlined three other ways the citizens of Vernal could benefit from competition.⁶ These areas include better service quality, more rapid introduction of innovative services, products and reduced costs and an incentive for the ILEC to reduce costs. One may not be able to place dollars and cents on the benefits of competition but those benefits are real. As a result national and state policies encourage competition.

As will be discussed later granting a Certificate to Bresnan should have no negative effect on telecommunications users in the rest of the state or more specifically in the rest of the Uintah

⁴ DPU 2.0 p. 17.

⁵ In fact there might be benefits to Vernal and the Uintah Basin whether Bresnan takes customers or not. Uintah Basin may react to competition by possibly cutting costs, improving service or otherwise offering services it does not currently offer or offering packages of services it does not currently offer.

⁶ DPU 2.0 p. 18-21.

Basin. As a result of Uintah Basin's drawing from the state USF fund its customers' rates will be limited to the affordable base rate determined to be reasonable by the Commission, which currently is set for Uintah Basin at \$16.50. At some point in the future a rate filing for additional USF funds may be necessary to keep its rates at the Commission determined affordable base rate. As for customers in the rest of the state who pay into the USF fund the Division testified that they should be no worse off for the foreseeable future and that the current level of the USF surcharge should be able to be maintained with the competition from Bresnan.⁷

4. THE STATE USF FUND AND THE WESTERN WIRELESS DECISION.

Undoubtedly, the main focus of the rural ILECs opposition to Bresnan's Certificate request is that the grant of the Certificate may have a negative impact on the state USF fund and that there are not corresponding public benefits to offset the negative impact on the USF. The ILECs then carry their discussion one step more and argue that before the Commission can grant the Certificate to Bresnan the Commission should look at the rest of the state and determine what the possible impact on the state USF fund might be if other CLECs want to do business in other rural exchanges. This argument represents the so-called camel's nose under the tent theory. The ILECs will base their argument, at least in part, on the Commission's decision in Western Wireless in 2000 and the affirming of that decision by the Utah Supreme Court in 2002.⁸

From a number of perspectives the DPU does not believe that either the PSC's Western Wireless decision or the Supreme Court's review of that decision provide relevant guidance to the Commission today in an Application for a CPCN. Second, even if the PSC applies the principals in the Western Wireless decision to this case the DPU believes that even under the

⁷ DPU 1.0 p. 13, 19.

⁸ In the Matter of the Petition of Western Wireless Holdings Co. for designation as an Eligible Telecommunications Carrier Docket No. 98-2216-01, Order July 21, 2000, WWC Holding Co. Inc. v. Public Service Commission, 44 P. 3d 714 (2002).

worst-case scenario projected by the ILEC's the Commission still should not deny the Certificate to Bresnan because of the possible USF impact. Finally, the DPU does not believe it would be reasonable to deny the CPCN for Bresnan while a speculative analysis of other rural exchanges is conducted to develop an estimate of the impact on the state USF fund if a CLEC requests a Certificate in another rural area.

a. Western Wireless.

In 1998 Western Wireless (WWC) filed an Application with the Commission to become a second eligible telecommunications carrier (ETC) in numerous exchanges of rural ILEC⁹ and in a number of Qwest exchanges. The exchanges where WWC sought ETC status were where it was currently providing wireless service. The Commission reviewed the Application under Section 214(e) of the Federal Telecommunications Act and its accompanying rules and under the applicable USF state rules. The Commission designated WWC as a second ETC for both federal and state USF support in the Qwest exchanges subject to certain conditions and denied WWC's request to become a second ETC for either Federal or State USF support in any of the rural ILEC exchanges. The main reason the PSC denied WWC's request in the rural areas was that it would have a negative effect on the state USF fund without corresponding public benefits. In affirming the PSC decision the Court held that "the PSC's conclusion that designation of WWC as a rural ETC would be detrimental to the State fund and would not result in lower prices or new services to currently unserved areas is supported by substantial evidence in the record as required by section 63-46b-16(4)(g)..."¹⁰ WWC argued that there were numerous factors supporting a

⁹ The rural companies for which WWC sought ETC status were Gunnison Telephone Company, Manti Telephone Company, Navaho Telecommunications Company, Skyline Telecom and South Central Utah Telephone Association. The exchanges in these companies where WWC sought ETC status is where it was currently providing service. Most if not all of the exchanges where WWC sought ETC status were less than 5,000 access lines.

¹⁰ 44 P3d par. 20. The Court relied on the expertise of the Commission and just determined if the findings were supported by substantial evidence.

finding that if considered the “PSC’s public interest determination would have tipped the public interest balancing test in WWC’s favor.¹¹ The Court left to the PSC’s expertise what factors it considered important in designating a second ETC and saw no reason to require the PSC to consider certain factors or to give those factors any specific weight.¹² The Court in discussing benefits cited by WWC’s Application and evidence noted that “The PSC appeared to be hindered throughout its decision-making process by the general problem that it had to determine public benefits by relying on WWC’s assertions and promises rather than objective documentation.”¹³ The Court noted this lack of specific information from WWC as support for its decision that it was not an abuse of discretion on the part of the PSC to not consider the benefits of competition cited by WWC. The true holding of the WWC Supreme Court decision is to place in the hands of the PSC the discretion to determine what factors are relevant in making a public interest findings and what weight to give to those factors.

b. Bresnan is not requesting ETC status.

Probably the most important legal distinction between the Bresnan Certificate request and WWC’s request to be an ETC is that Bresnan is not seeking to be an ETC in Utah and has not sought to become an ETC in any of the states in which it is currently operating. The statute Bresnan seeks authority under is different than the statute that WWC sought ETC status under. The WWC public interest test can be found in Section 214(e) of the Federal Telecommunications Act. It provides that in rural exchanges a state Commission may refuse to grant ETC status if it determines the request is not consistent with the public interest, convenience and necessity.¹⁴ A

¹¹ 44 P3d par 21.

¹² 44 P3d par 21.

¹³ 44 P3d par 23. The Court went through a list of items that WWC had failed to provide specific documentation on. These included lack of information on the service and equipment it intended to offer, service area coverage details, or details of whether WWC would provide an adequate level of service at affordable rates.

¹⁴ 47 USC § 214(e).

clear distinction is made between a rural and non-rural exchange. In an urban exchange like Qwest there is not public interest way of refusing grant of a second ETC – it is not in the public interest to refuse to grant a second ETC. One also must remember that a request to be an ETC is a request to obtain Federal and State USF support. It is not a request to be allowed by the state to provide service. For example WWC was already providing service in all of the exchanges it requested ETC status. After the denial of ETC status by the PSC WWC was still free to provide whatever services it wanted to provide at whatever price in competition with the rural ILECS. Bresnan, on the other hand, is requesting authority to provide service under Utah law found in U.C.A. § 54-8b-2.1. Absent a Certificate Bresnan will not be able to provide service in Vernal and the citizens of Vernal will be denied competitive choice. Citizens of all of the rural exchanges where WWC asked for ETC status can buy wireless services from WWC. Nothing the PSC did prohibited WWC from selling its product. It strikes the DPU that with such a significant difference in the purposes of the public interest test in each statute the factors the PSC can consider and the weighting it gives to each factor can be quite different. In U.C.A. § 54-8b-2.1 the public interest test makes no distinction between an exchange in a Qwest urban area or an exchange located in Vernal with over 5,000 access lines. The only distinction in the public interest test for a Certificate applies to exchanges of less than 5,000-access lines. As a result of Bresnan's request being under a different statute and for an entirely different purpose than WWC's application there is nothing in either the decision at the Commission level or the Supreme Court that mandates application of the same balancing test it used in the WWC case to this case. Nor is there anything in either the PSC decision or the decision of the Supreme Court that would require the PSC not to consider all of the benefits associated with competition that have served as the basis of over 90 CLEC's in the state obtaining Certificates with a positive

public interest finding. As the Supreme Court made clear in its decision the Commission is in the best position to determine which factors go into making up the public interest and what weight those factors are to be given.

- c. Bresnan has submitted all necessary information about the price, coverage area and services that clearly define the competitive product it will offer.

Mr. Coleman testified that the DPU did not see the same holes in the Bresnan service offering that were apparent in WWC application. Bresnan has been very specific about where it will serve, at what price it will offer service, what its service offering will consist of and what specific technology it will use to offer service.¹⁵ The Division testified that with the product Bresnan intends to offer which is not currently available in Vernal the citizens of Vernal will realize positive benefits by this offering. This issue of lack of specificity was pointed out by the Court as limiting the PSC review of the WWC Application.¹⁶ The legislative policy of promoting customer choice would be promoted by the grant of the CPCN to Bresnan. Further the legislative policy of promoting the deployment of advanced telecommunication services would also be promoted by Bresnan providing service.

- d. The competitive landscape has changed the facts since the WWC decision.

Ms. Scholl on behalf of the Division testified to changes in the competitive landscape in the state and in Vernal. First, Qwest regulation has moved away from price regulation and is not more aligned with regulation similar to any CLEC. The legislature also reaffirmed a straightforward way for a company like UBTA to move to a pricing flexibility form of regulation. Second, since the WWC new technologies have emerged to allow some consumer choice in Vernal to the ILEC. Wireless competition has become pervasive and is now the major

¹⁵ DPU Ex. P. 6-7, 19. The DPU indicated that at least seven wireless companies provide service in Vernal. AT&T, Sprint/Nextel and Version all indicate they have coverage in Vernal. Besides Vonage the DPU determined that other VOIP providers also provide service in Vernal.

¹⁶ 44 P3d par 23.

contributor to the state USF fund. VOIP services such as Vonage are widely available and only require a broadband connection. Wi-fi and Wi-max services are also providing substitutes for traditional landline service.¹⁷ The big difference between Bresnan and these other offerings is that currently no certificate is required of these competitive choices while Bresnan currently still needs a certificate. In other words the effects of competition is already present. Is it reasonable considering the legislative policy in favor of competition to deny Bresnan's request in light of all of the uncertificated competition? One must also keep in mind that many of the competitive alternatives to the Bresnan's product are affiliates of the ILEC. Uintah Basin provides long distance, DSL, satellite TV, wireless and is an ISP through affiliates of the ILEC.

e. Analysis of the state USF fund impact.

First, the PSC should be very cautious in its use of the impact of competition on the state USF fund as a way of denying competition in Vernal. Again one must remember that WWC was not denied the ability to compete but was only denied federal and state USF support. Section 253 of the Federal Act states:

(a) In general

No State or local statute or regulation, or other State or local legal requirement, may prohibit or have the effect of prohibiting the ability of any entity to provide any interstate telecommunications service.

(b) State regulatory authority

Nothing in this section shall affect the ability of a State to impose, on a competitively neutral basis and consistent with section 254 of this section, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications service, and safeguard the rights of consumers.

The Utah USF state statute states that the operation of the fund should be non discriminatory and competitively and technology neutral in the collection and distribution of

¹⁷ DPU Ex. 1.0 p 8.

funds, neither providing a competitive advantage for, nor imposing a competitive disadvantage upon any telecommunications provider operating in the state.¹⁸

Analysis of the impact on the state USF fund was presented by both the DPU and Mr. Meredith and Mr. Hendershot. Surprisingly, the estimates were not that far apart. Even though each witness developed the number differently using different time horizons, penetration rates, and revenues per customer the magnitude of the difference is not that significant considering the speculative nature of the entire attempt to estimate the impact on the USF. The range of estimates for the foreseeable impact on the state USF fund appeared to be between \$250,000 and \$500,000 annually.¹⁹ Other estimates were presented with higher or lower dollar numbers or a statewide impact if other providers enter the market.²⁰ This pleading will not try and sort out the differences between one estimate or another since it is clear that all estimates of this type are speculative and only provide an order of possible magnitude. Many unanswered questions left to the future are needed to make the estimates less speculative. These may include: how will the ILEC react to competition by possibility offering new products, reducing costs, or otherwise affecting the estimates made, what new sources of revenues may be available to the ILEC that could offset the estimates such as wholesale rates or offsetting access charges that Bresnan will be paying, etc., what else is occurring in the Uintah Basic outside of Vernal that may affect the ILECs total revenue requirement and how rapidly will Bresnan be able to penetrate a market that has been controlled by the ILEC for many years. The key question for the DPU in balancing the benefits of Bresnan entering the market against the effect on the state USF fund was did these

¹⁸ 47 USC 253 and 54-8b-15.

¹⁹ Mr. Meredith provided his best estimate at TR 335.

²⁰ As to penetration rates one should review the confidential Bresnan Ex 4.5 which provides the penetration rate for Bresnan for the non Qwest exchanges it is serving on both the bases of cable subscribers who are digital phone subscribers and a penetration rate for houses passed by Bresnan facilities. One can apply those penetration rates to both Mr. Coleman's confidential Ex. 2.2 and Mr. Meredith's Ex. Confidential reply Ex. I. These calculations will also provide the PSC with another way of estimating the impact on the state USF fund.

estimated USF impact numbers cause the DPU to be concerned enough to oppose Bresnan's application. The answer was no. DPU Ex. 1.1SR outlines the current surcharge rate of the USF, the current amounts collected and disbursed and the current surplus in the state USF fund. A history of the amounts collected and disbursed was provided for a historical period. Also provided was the surcharge rate that has been used since it went into effect in 1998. What was clear to the DPU was that under the estimates provided the effect of competition in Vernal could be absorbed by the fund at its current collection rate.²¹

The rural ILECs also argue that the PSC should deny the Certificate request for Bresnan because there may be other CLEC's out there who will request a Certificate in other rural areas and have an impact on the state USF fund. The DPU disagrees that a decision should be delayed for Bresnan because of the possible presidential effect of this decision and the lack of an estimate at least by the DPU of the effect on the state USF fund if competition develops in other rural areas. First, the DPU believes there are only two other exchanges in rural ILEC areas where there are more than 5,000 access lines. Second, at least Mr. Meredith estimated the impact if other cable providers entered the market. That number can be found in his direct testimony at line 159. It was marked confidential. It has now been 12 years since the passage of the Utah law opening up local exchange competition. Bresnan represents the first Application to go to hearing. It seems unreasonable to deny a qualified company's Application while a speculative attempt is made to estimate the impacts if more competitive entrants want to enter the market elsewhere. In this case a clearly qualified company is awaiting a decision. There services and prices are known. The impact on the state fund has been estimated. The balancing test the PSC may apply can be determined for this Applicant.

²¹ Testimony of Ms. Scholl in explaining DPU Ex 1.1SR.

5. OTHER EXTRANEIOUS ISSUES SHOULD NOT BE USED TO DENY THE CERTIFICATE.

There are a variety of issues raised that may be argued as a basis for denial of the Certificate. The DPU would like to address some of those issues.

The rural ILECs may argue that since it is possible Bresnan does not need a Certificate under Federal law that the PSC should not issue a Certificate. It seems clear until a Federal decision preempts state certificate requirements for a provider such as Bresnan the state should make its decision on the record it has and sort out pre-emption issues if and when they happen. After all it is Bresnan who is voluntarily submitting itself to state jurisdiction, acknowledging at least under current law it needs state authority. It does seem clear to the DPU that unless preempted by Federal law Utah statute makes the product Bresnan intends to provide a public telecommunications service subject to state Certification requirements.

The rural ILECs raise issues with respect to their obligation to enter into an interconnection agreement and their obligation to sell wholesale services to Bresnan. They argue that separate proceedings may be needed to address Federal standards that could require them to offer UNE's to Bresnan. The DPU does not believe those issues need to be resolved in this docket. Bresnan has indicated its ability to negotiate workable interconnection agreements with other rural ILECs in other states where wholesale services were purchased. If the obligation to provide service in the Vernal exchange cannot be achieved through voluntary negotiations and agreements the DPU would stand ready to assist in the process and the Commission would stand ready to resolve disputes. However, all of the issues surrounding the possible price for a UNE or a resale rate or even what the ILEC's obligations are can await future proceedings if needed and should not be the basis for denying or delaying the Certificate.

Bresnan has voluntarily agreed to accept the obligation under U.C.A. § 54-8b-2.1(4) to provide public telecommunication services throughout the Vernal exchange and not just where it currently provides cable TV service. The DPU agreed that the PSC should impose this obligation on Bresnan, and the independent ILECs also seem to support this obligation. They, however, then argue that Bresnan may not be able to provide the exact same service outside of its cable footprint. If the Commission adopts this condition Bresnan will be required to file a public price list with a description of its service offerings through out the entire Vernal exchange. This offering of services throughout the entire Vernal exchange would have to take place at the time Bresnan begin to offer service in Vernal. Any disputes surrounding the failure to meet this obligation can be addressed at that point. It seems somewhat incongruous for the rural companies to support this obligation and then not be willing to sell wholesale products to the CLEC.

6. CONCLUSION

After a careful review of the services Bresnan intends to offer and after estimating the impact of its offering service on the USF fund, the DPU supports the PSC granting the Certificate to Bresnan. Federal and state policy clearly endorses competition in exchanges the size of Vernal. The USF fund currently is designed to support the availability of affordable services in both Vernal and in the rest of the Uintah Basin. Those objectives can be achieved while also permitting competitive choice to the citizens of Vernal.

Respectfully submitted this _____ day of October, 2007.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Posthearing Brief of the Utah Division of Public Utilities in Support of Application by Bresnan Broadband was transmitted electronically (email) on this the _____ day of October, 2007 to the following:

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