

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Jay Scott Emler, Chairman
Shari Feist Albrecht
Pat Apple

In the Matter of a General Investigation of)
TAG Mobile, LLC to Show Cause Why This)
Commission Should Not Initiate Sanctions) Docket No. 16-TAGC-323-SHO
and Fines and Cancel, Suspend and Revoke)
Any Authority the Carrier Currently Holds.)

**ORDER DENYING MOTION TO DISMISS; GRANTING EVIDENTIARY HEARING;
DESIGNATING PREHEARING OFFICER; AND PROTECTIVE AND DISCOVERY
ORDER**

This matter comes before the State Corporation Commission of the State of Kansas (Commission) for consideration and decision. Having reviewed the files and records, and being duly advised, the Commission finds:

1. On November 15, 2012, in Docket No. 12-TAGC-843-ETC (12-843 Docket), the Commission issued an Order granting Eligible Telecommunications Carrier (ETC) status to TAG Mobile, LLC (TAG) for Lifeline support in specific wire centers in Kansas served by Southwestern Bell Telephone Company, d/b/a AT&T Kansas. The Commission's Order designated TAG as a Lifeline-Only ETC for the purpose of receiving federal and state Lifeline support.

2. The Order granting Lifeline-Only ETC status was conditioned upon TAG: (1) passing the entire KUSF Lifeline discount through to its customers; (2) providing Lifeline service through its own facilities or a combination of its own facilities and another carrier's services; (3) utilizing Lifeline support for its intended purpose and complying with the annual ETC certification requirements and other ETC requirements developed by the Commission; and (4) filing quarterly reports pursuant to Staff's recommendation in the 12-843 docket.

3. On December 23, 2015, Commission Staff (Staff) submitted a Report and Recommendation (R&R), which found that Selectel, Inc. (Selectel) is impermissibly offering Lifeline service in Kansas through TAG's ETC designation.¹ Selectel has not been granted ETC status in Kansas, and is thus not authorized to provide Lifeline service in Kansas. According to Staff, Selectel is affiliated with TAG as an Independent Sales Organization. TAG provided Staff a copy of the Independent Sales Organization Agreement. Staff claims that pursuant to the Independent Sales Organization Agreement, TAG is not providing voice telephony service to low-income consumers as required by 47 C.F.R. 54.101(a), nor utilizing its own facilities or a combination of its own facilities and resale of another carrier's services.² Thus, Staff found TAG in violation of 47 U.S.C. 214(e)(1), K.S.A. 66-2008(b), and the Commission's Order in the 12-843 Docket designating TAG as an ETC.

4. Staff's R&R also expressed concern that TAG was not complying with the 12-843 Order in not passing along the entire Lifeline discount to its consumers.³ Therefore, Staff recommended the Commission open a proceeding requiring TAG to show cause why it should not be subject to sanctions and fines, and its ETC designation should not be canceled, suspended and/or revoked.⁴ Staff also recommended the Commission direct GVNW (the KUSF third party administrator) to immediately cease providing Lifeline support to TAG until this issue is resolved.⁵

5. On January 14, 2016, the Commission issued an Order to Show Cause, giving TAG thirty (30) days to demonstrate why it should not be subjected to sanctions and fines and its

¹ Order to Show Cause, Jan. 14, 2016, with Attached Report and Recommendation, Dec. 23, 2016, p. 3.

² *Id.*, p. 4.

³ *Id.*, p. 4.

⁴ *Id.*, p. 4.

⁵ *Id.*, p. 4.

ETC designation should not be canceled, suspended and/or revoked. Additionally, the Show Cause Order also required GVNW to immediately cease providing Lifeline support to TAG until the issue is resolved.

6. On February 2, 2016, TAG filed a Petition for Reconsideration (PFR), asking the Commission to reconsider cessation of TAG's Lifeline Support funding. TAG claims it is inappropriate to remove its Lifeline support before it has an opportunity to respond to Staff's allegations. Without waiving its argument that it is inappropriate to terminate its Lifeline support, TAG volunteered to have its Lifeline payments set aside during the pendency of this docket to be dispersed, as necessary, at the conclusion of this Docket.⁶

7. On February 3, 2016, Staff filed its response to TAG's PFR, explaining while the Commission's actions directing GVNW to withhold Lifeline Payments were appropriate given the Commission's fiduciary duty to the KUSF, limited reconsideration to TAG's Lifeline support to be set aside during the pendency of this Docket was appropriate and had been used successfully in the past.⁷

8. On February 17, 2016, TAG filed a Response to the Show Cause Order, asserting it is in compliance with FCC rules and Kansas law, which has adopted the federal standards for designating a provider as an ETC for KUSF purposes.⁸ TAG states that its previous filings prove it is not in violation of state or federal statutes, rules or orders. TAG requested "the Commission find TAG has not violated federal or Kansas ETC rules" and to "dismiss this show cause

⁶ TAG Mobile, LLC's Petition for Reconsideration, Feb. 2, 2016, ¶ 6.

⁷ Staff's Response to TAG Mobile, LLC's Petition for Reconsideration, Feb. 3, 2016, ¶5.

⁸ Response to TAG Mobile, LLC to Show Cause Order, Feb. 17, 2016, ¶ 9.

proceeding” or, in the alternative, to schedule this matter for an evidentiary hearing and issue a Discovery and Protective Order.⁹

9. On February 26, 2016, Staff filed a Response to TAG’s Response to the Show Cause Order, requesting the Commission find TAG in violation of federal and state ETC rules for providing Lifeline service. Staff did not respond to TAG’s alternative request for an evidentiary hearing.

10. On March 3, 2016, the Commission granted TAG’s Petition for Reconsideration, directing that TAG’s Lifeline payments should be set aside until the conclusion of this Docket. On March 3, 2016, the Commission granted TAG’s PFR directing GNVW to set aside TAG’s KUSF payments until the final outcome of this Docket.¹⁰

11. On March 10, 2016, TAG filed a Motion to Dismiss Show Cause or for Evidentiary Hearing, arguing the Show Cause Order is based solely on Staff’s R&R, which TAG alleges to be “fraught with inconsistencies and errors”¹¹ and unsupported by precedent or authority.¹²

12. On March 22, 2016, Staff filed its Response to TAG Mobile, LLC’s Motion to Dismiss Show Cause or for Evidentiary Hearing, reaffirming its arguments from its Response to TAG Mobile LLC’s Response to Show Cause Order and advising the Commission to deny TAG’s request for a hearing based on TAG’s violation of federal and Kansas ETC rules for providing Lifeline service in Kansas.¹³

⁹ Response to TAG Mobile, LLC to Show Cause Order, Feb. 17, 2016, p. 8.

¹⁰ Order Granting Petition for Reconsideration, Mar. 3, 2016, p. 4.

¹¹ Motion to Dismiss Show Cause or for Evidentiary Hearing, Mar. 10, 2016, ¶ 2.

¹² *Id.*, ¶ 6.

¹³ Staff’s Response to TAG Mobile, LLC’s Motion to Dismiss Show Cause or for Evidentiary Hearing, Mar. 22, 2016, ¶¶ 5-6.

13. *Ripley v. Tolbert*, 260 Kan. 491 (1996) offers guidance on reviewing motions to dismiss.¹⁴ *Ripley* concluded, “[d]isputed issues of fact cannot be resolved or determined on a motion to dismiss for failure of the petition to state a claim upon which relief can be granted. The question for determination is whether in the light most favorable to plaintiff, and with every doubt resolved in plaintiff’s favor, the petition states any valid claim for relief. Dismissal is justified only when the allegations of the petition clearly demonstrate plaintiff does not have a claim.”¹⁵

14. Under the standard announced in *Ripley*, in reviewing the Motion to Dismiss, the Commission must view the allegations in the Show Cause Order in the most favorable light with every doubt resolved in favor of the allegations. Absent a clear demonstration that the Show Cause Order does not make a claim, the Commission cannot justify dismissal. Applying *Ripley*, the Commission denies TAG’s Motion to Dismiss Show Cause Order.

15. As acknowledged by Staff, K.A.R. 82-1-232(b) permits TAG to request a hearing.¹⁶ Since TAG is faced with possible sanctions and fines, including the cancelation, suspension or revocation of its ETC designation, due process entitles TAG to a hearing. Therefore, the Commission grants TAG’s request for an evidentiary hearing.

16. The Commission designates Brian G. Fedotin, Deputy General Counsel, 1500 SW Arrowhead Road, Topeka, KS 66604-4027, telephone number (785) 271-3105, b.fedotin@kcc.ks.gov, to serve as Prehearing Officer in this proceeding.¹⁷ The prehearing officer may conduct any prehearing conferences necessary to address any matters appropriately

¹⁴ *Prager v. Kansas Dept. of Revenue*, 271 Kan. 1, 10 (2001).

¹⁵ *Id.*, citing *Ripley v. Tolbert*, 260 Kan. 491, 493 (1996).

¹⁶ Staff’s Response to TAG Mobile, LLC’s Motion to Dismiss Show Cause or for Evidentiary Hearing, ¶ 6.

¹⁷ K.S.A. 77-514; K.S.A. 77-516; K.S.A. 77-551(c).

considered in a prehearing conference, including all items listed in K.S.A. 77-517(b) of the Kansas Administrative Procedure Act (KAPA). The Commission may designate other staff members to serve in this capacity.

17. The Prehearing Officer is directed to confer with the parties to develop a procedural schedule, including an evidentiary hearing.

III. Protective Order

18. K.S.A. 66-1220a and K.A.R. 82-1-221a set forth requirements for the designation and treatment of information deemed confidential in Commission proceedings. The Commission finds it appropriate to issue this Protective Order to establish procedures relating to confidential data and information.

19. K.S.A. 66-1220a limits disclosure of trade secrets or confidential commercial information of regulated utilities. Under K.S.A. 66-1220a(a)(4), the Commission is to consider alternatives to disclosure that will serve the public interest and protect the regulated entity. This Protective Order provides an interim procedure under K.S.A. 66-1220a(a)(4) to facilitate the prompt and orderly conduct of this case. This Protective Order will govern the treatment and handling of confidential information until further order of the Commission.

20. A party may designate as confidential any information that it believes, in good faith, to be a trade secret or other confidential commercial information. The party designating the information as confidential must provide a written statement of the specific grounds for the designation at the time the designation is made.¹⁸ The party claiming confidentiality has the burden of proving the confidential status of the information. Designating information as

¹⁸ K.A.R. 82-1-221a(a)(5).

confidential does not establish that the information will not be subject to disclosure after review by the Commission.¹⁹

21. This Protective Order applies to all parties in this proceeding, unless specifically stated otherwise. The provisions of the Protective Order apply to Staff, except that Staff is not required to sign nondisclosure certificates or view voluminous materials on site and is not required to return or destroy confidential information upon request at the conclusion of a proceeding. Outside experts and consultants used by Staff shall have access to information and voluminous materials on the same basis as Staff, except that outside Staff experts and consultants are required to read this Protective Order and to sign nondisclosure certificates as contained in Appendix A.

22. The following definitions shall apply:

Information: “Information” refers to all documents, data, including electronic data, studies and other materials furnished pursuant to requests for information or other modes of discovery, or any other information or documents that are otherwise a part of the Commission record.

Confidential Information: “Confidential information” refers to information which, if disclosed, would likely result in harm to a party’s economic or competitive interests or which would result in harm to the public interest, generally, and which is not otherwise available from public sources. “Confidential information” may include, but is not limited to: (1) material or documents that contain information relating directly to specific customers; (2) employee-sensitive information; (3) marketing analyses or other market-specific information relating to services offered in competition with others; (4) reports, work papers or other documentation related to work produced by internal or external auditors or consultants; (5) strategies employed, to be employed, or under consideration; (6) contract negotiations; and, (7) information concerning trade secrets, as well as private technical, financial, and business information.

23. A party designating information as confidential shall make the confidential information available to parties seeking access or discovery under the restrictions in this

¹⁹ See K.S.A. 66-1220a.

Protective Order, if such disclosure is not otherwise privileged or objectionable on other evidentiary grounds. Disclosure of confidential information shall be made to attorneys of record and to authorized representatives, including outside experts, who are consulting with parties or intend to file testimony in this proceeding. Attorneys or authorized representatives seeking access to confidential information shall first read this Protective Order and sign a nondisclosure certificate as provided in Appendix A. In cases in which a utility's rates are being reviewed, attorneys and representatives of the utility whose rates are being reviewed are not required to sign nondisclosure certificates in order to receive copies of documents containing the utility's own confidential information. The nondisclosure certificate shall contain the signatory's name, permanent address, title or position, date signed, and an affirmation that the signer is acting on behalf of a party to this proceeding. The nondisclosure certificate shall be filed in the docket. The party claiming confidentiality shall provide legible copies of the confidential information to requesting parties by serving one copy upon counsel for the requesting party. The requesting party may copy the confidential information and make it available to its authorized representatives who have signed and filed nondisclosure certificates. If a response to a discovery request requires the duplication of voluminous material, or the material is not easily copied because of its binding or size, the furnishing party may require that the voluminous material be viewed on its own premises. If duplication of voluminous material can be accomplished without undue burden on the party disclosing the information, the voluminous material may be copied at the expense of the requesting party. Voluminous material shall include documents or materials comprised of 200 pages or more.

24. A party may designate prefiled testimony and exhibits as confidential pursuant to this Protective Order. The specific grounds for the confidential designation shall be stated in writing at the time the designation is made or the testimony filed. Any party obtaining confidential information may use or refer to such information in prefiled or oral testimony provided that the confidentiality is maintained, unless otherwise ordered by the Commission.

25. If information to be disclosed in response to a data request contains confidential information designated by another party in this docket, the furnishing party shall maintain the confidential status by marking the information as confidential and only provide response to parties that have signed nondisclosure certificates. If information that a party intends to use in this proceeding or that would be disclosed in response to a data request contains confidential information obtained from a source outside of this proceeding, the party intending to use or provide the confidential information must notify the original source which claimed confidential status to allow that entity to decide whether to claim confidentiality in this proceeding.

26. When pleadings, prefiled testimony, or exhibits include confidential information, the parties are to follow these procedures:

a. File seven copies of the complete document, including all confidential information. The cover is to clearly state "CONFIDENTIAL VERSION." Confidential pages shall be stamped "CONFIDENTIAL," and the specific confidential information shall be identified by being underlined.

b. File one copy with the confidential portions redacted, for use as a public document. The cover is to clearly state "PUBLIC VERSION."

c. File one copy of the pages that contain confidential information in a separate envelope marked "CONFIDENTIAL." This filing will be maintained in the docket room file under seal. If there are multiple pages with confidential information and it is impracticable to separate the pages with the confidential information, the party may file instead one copy of the entire document that is stamped "CONFIDENTIAL."

27. Confidential testimony may be offered or subject to cross-examination at hearings. Parties have the right to object to the admissibility of confidential information on standard evidentiary grounds such as relevance. Confidential information that is received into evidence will be kept under seal. Confidential information shall be discussed only after the hearing is closed to all persons except the Commission, its Staff, hearing examiners, court reporters, attorneys of record and individuals to whom the designated information is available under the terms of this Protective Order. Parties shall make every effort at hearings to ask and answer questions in such a way as to preserve the confidentiality of the information without the need to close the hearing. The transcript of live testimony or oral argument disclosing confidential information shall be kept under seal and copies provided only to persons entitled to access to confidential information. Neither the parties nor their attorneys shall disclose or provide copies of the contents of such transcripts to anyone other than those who may have access to the designated information under the terms of this Protective Order.

28. If a party disagrees with a claim that information is confidential or should not be disclosed, the parties shall first attempt to resolve the dispute on an informal basis. If the parties cannot resolve the dispute informally, the party contesting the confidential treatment may file a motion with the Commission. Commission Staff should also be prepared to challenge a confidential designation when Staff believes that the information does not meet the definition of confidential information. When a dispute concerning the confidentiality is brought before the Commission, the Commission will review the matter to determine (1) if the party claiming confidentiality has met its burden of establishing the confidential designation is proper, and (2)

whether disclosure is warranted under K.S.A. 66-1220a. The contested information shall not be disclosed pending the Commission's ruling.

29. All persons who are afforded access to confidential information under the terms of this Protective Order shall neither use nor disclose such information for purposes of business or competition or any other purpose other than the purpose of preparation for and litigation of this proceeding. During the course of this proceeding, parties shall keep confidential information secure in accordance with the purposes and intent of this order. At the conclusion of this proceeding, including judicial review, a party claiming that information was confidential may require that other persons in possession of its confidential information return or destroy all such confidential information and all notes, tapes, documents, and any other medium containing, summarizing, or otherwise embodying such confidential information. If the party claiming confidentiality requests destruction, the person destroying the information shall certify its destruction. Counsel shall be entitled to retain memoranda or pleadings including or embodying confidential information to the extent reasonably necessary to preserve a file on this proceeding.

IV. Discovery Order

30. The Commission finds that formalizing discovery procedures and clarifying the obligations of the parties will help ensure a full and efficient investigation of the issues in this docket. This Discovery Order will govern the conduct of discovery until further order of the Commission. Parties may request modified or additional discovery procedures or may request that the Commission schedule a discovery pre-hearing conference.

31. General procedures. Discovery in Commission proceedings is limited to matters that are “clearly relevant.”²⁰ After a docket is opened, any party may serve upon any other party written discovery or data requests. These data requests shall identify with reasonable particularity the information or documents sought. Data requests must be designed to elicit material facts within the knowledge of the parties. Data requests that require conclusions of law or answers to hypothetical questions are generally not permitted. Cross-examination through the use of data requests is not appropriate. Copies of data requests shall be served upon all other parties to the proceeding, unless a party requests otherwise. Data requests and responses may be served by facsimile transmittal or electronic mail if agreed to by the parties. Data requests that are sent by a party after 5:00 p.m. shall be deemed to have been received the following business day.

32. Data Request Responses. Responses to Staff data requests are due within seven days.²¹ Responses to all other data requests are due within 10 days, not counting Saturdays, Sundays, or legal holidays. In computing the period of time for responding, the day on which the data request was issued is not counted. Parties may agree to extensions or reductions of time in which to respond or object to a data request. Responses to data requests shall be verified and shall identify the person(s) who actually prepared the response and can answer additional questions relating to the response. Each data request shall be answered separately and preceded

²⁰ K.A.R. 82-1-234a(a).

²¹ Per K.A.R. 82-1-217, the day of the act, event, or default from which the designated period of times begins to run shall not be included. The last day of the period so computed shall be included, unless it is a Saturday, Sunday, or legal holiday, in which event the period runs until the end of the next day which is not a Saturday, a Sunday, or a legal holiday.”

by the request to which the answer pertains. Responses shall be clearly identified and, if consisting of several pages, shall be labeled and organized in a manner that makes review of the pages convenient. Parties are under a continuing duty to supplement their discovery responses upon learning that the information disclosed is incomplete or incorrect in any material respect. If a response to a data request requires the duplication of voluminous material or of material that is not easily copied because of its binding or size, a party may require that any party other than Commission Staff review the voluminous material on its own premises. If duplication of voluminous material can be accomplished without undue burden, the voluminous material may be copied at the expense of the requesting party. Voluminous material is defined as documents comprised of 200 pages or more.

33. Objections to Data Requests. If the parties have agreed to electronic service, if a party objects to answering a particular data request, the party shall object in writing to the party which issued the data request within five days of the data request.²² If the parties have not agreed to electronic service, if a party objects to answering a particular data request, the objecting party shall object in writing to the issuing party within five working days after service, plus three days if service is by mail. The written objection shall specifically explain all grounds relied upon for objecting to each data request. Any objections not provided at this time will be considered to be waived. If an objection pertains only to part of a question, that part shall be clearly identified and the responding party shall provide any non-objectionable information covered by the remainder of the data request. Parties shall negotiate in good faith to resolve discovery disputes. If resolution is not possible, the party seeking discovery may file a motion to

²² Per K.A.R. 82-1-217, the designated time begins to run the day after service. When the period of time prescribed or allowed is less than seven days, intermediate Sundays and holidays shall be excluded in the computation. A legal holiday includes any day designated as a holiday by either the United States Congress or the Kansas Legislature.

compel with the Commission. Motions to compel must have the data request and response at issue attached. Responses to motions to compel are to be filed within three days after the motion is received, not counting intermediate Sundays, or legal holidays. The Commission may act immediately on motions to compel if necessitated by time constraints or the procedural schedule in the docket.

34. Limitations on Discovery. The Commission may limit discovery to protect a party against unreasonable, cumulative, or duplicative discovery requests; to prevent undue delay in the proceeding; to avoid unnecessary burden, expense, or harassment; or to otherwise maintain the orderly and efficient progress of the proceeding. Upon finding that a party has abused the discovery process, the Commission may deny the right to continue discovery.

35. Sanctions. A motion for sanctions for discovery violations may be filed at any time during the proceeding or may be initiated by the Commission. A motion is to contain sufficient factual allegations to detail the violation and must specify the relief requested. Responses to motions for sanctions are to be filed within 10 days, not counting Saturdays, Sundays, or legal holidays.

- a. The Commission will consider any relevant factors when reviewing a motion for sanctions, including whether discovery has been conducted in bad faith or for an improper purpose such as causing unnecessary delay or needless increase in the cost of the proceeding; whether the discovery process has been abused in seeking or resisting discovery; and whether parties have failed to obey Commission Orders.
- b. Sanctions imposed by the Commission may include limiting or disallowing further discovery; holding that designated facts be deemed admitted for purposes of the proceeding; refusing to allow a party to support or oppose a claim or defense or prohibiting the party from introducing designated matters in evidence; disallowing in whole or in part requests for relief by the offending party and excluding evidence in

support of such requests; striking pleadings or testimony; staying further proceedings until an order is obeyed; disallowing a party's right to participate in the proceeding; dismissing the application or filing with or without prejudice; requiring the offending party to pay the reasonable expenses, including attorney's fees, incurred by other parties because of the sanctionable behavior; and imposing any other sanction or remedy available to the Commission by law.

THEREFORE, THE COMMISSION ORDERS:

- A. TAG's Motion to Dismiss Show Cause Order is denied.
- B. TAG's Motion for an Evidentiary Hearing is granted. Brian G. Fedotin, Deputy General Counsel is designated as Prehearing Officer. The Prehearing Officer is directed to confer with the parties to schedule an evidentiary hearing.
- C. The provisions of this Protective and Discovery Order shall govern the treatment and handling of confidential information in this docket.
- D. The parties have 15 days from the date of service, plus 3 days if by mail, to petition for reconsideration.²³
- E. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders as it deems necessary.

BY THE COMMISSION IT IS SO ORDERED.

Emler, Chairman; Albrecht, Commissioner; Apple, Commissioner

Dated: **MAY 17 2016**



Amy L. Green
Secretary to the Commission

BGF/dc

EMAILED

²³ K.S.A. 66-118b; K.S.A. 77-529(a)(1).

MAY 17 2016

APPENDIX A

Docket No. 16-TAGC-323-SHO
THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

NONDISCLOSURE CERTIFICATE

I, _____, have been presented a copy of the Protective Order issued in Docket No. 16-TAGC-323-SHO on the ____ day of _____, 2016.

I have requested review of confidential information produced in the above-mentioned docket on behalf of _____.

I hereby certify that I have read the above-mentioned Protective Order and agree to abide by its terms and conditions.

Dated this _____ day of _____, 2016.

Printed name and title

Signature

Party/Employer

Address (City, State and ZIP)

Telephone

Facsimile

CERTIFICATE OF SERVICE

16-TAGC-323-SHO

I, the undersigned, certify that the true copy of the attached Order has been served to the following parties by means of

Electronic Service on MAY 17 2016.

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MAY 17 2016