

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICANT: BRANDY L. WREATH
DIRECTOR, PUBLIC UTILITY DIVISION
OKLAHOMA CORPORATION COMMISSION

RESPONDENT: TRUE WIRELESS, LLC

RELIEF REQUESTED: CONTEMPT) CAUSE NO. EN 201300115
)
) ORDER NO. **658477**

NMS
MC

HEARING: September 22, 2016, in Courtroom B
2101 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105
Before Mary Candler, Administrative Law Judge

APPEARANCES: Jeff W. Kline, Assistant General Counsel, *representing* Public Utility
Division, Oklahoma Corporation Commission
Jack G. Clark, Jr., Attorney *representing* True Wireless, LLC
Dara M. Derryberry, Assistant Attorney General *representing* the Office
of the Attorney General of the State of Oklahoma

**FINAL ORDER APPROVING JOINT STIPULATION
AND SETTLEMENT AGREEMENT**

BY THE COMMISSION:

The Oklahoma Corporation Commission (“Commission”), being regularly in session, and the undersigned Commissioners present and participating, there comes on for consideration and action the above Cause for an Order of the Commission.

I. PROCEDURAL HISTORY

On November 26, 2013, Brandy L. Wreath, Director of the Commission’s Public Utility Division (“PUD”) initiated this Cause by filing a Complaint, Information, Summons, and Notice of Citation for Contempt against True Wireless, LLC (“True Wireless”).

On December 2, 2013, the Attorney General of the State of Oklahoma (“AG”) filed his Entry of Appearance.

On December 19, 2013, an oral Motion for Protective Order was heard and recommended by the Administrative Law Judge (“ALJ”).

Also, on December 19, 2013, an oral Motion to Establish Procedural Schedule was heard and recommended.

On January 2, 2014, an Order Granting Motion for Protective Order was issued by the Commission in Order No. 619881.

On February 20, 2014, an Order Establishing Procedural Schedule was issued by the Commission in Order No. 621738. The Commission issued an Order Amending Procedural Schedule on April 24, 2014, by Order No. 624446.

On July 7, 2014, the AG's office filed a Notice of Withdrawal of Counsel for Jerry J. Sanger.

On September 16, 2014, the AG filed an Entry of Appearance for Tessa L. Hager.

On December 15, 2014, the AG filed a Notice of Withdrawal as Counsel for Tessa L. Hager.

On July 28, 2015, the AG filed a Notice of Withdrawal as Counsel for Erick W. Harris.

On June 3, 2016, the AG filed an Entry of Appearance for Dara M. Derryberry, C. Eric Davis and Kimberly Carnley.

On June 29, 2016, the AG filed a Notice of Withdrawal as Counsel for C. Eric Davis.

On July 12, 2016, the AG filed a Notice of Withdrawal as Counsel for Kimberly Carnley.

On September 16, 2016, a Joint Stipulation and Settlement Agreement (the "Stipulation") was filed with the Court Clerk. The Stipulation was executed by PUD, True Wireless, and the AG (collectively, the "Stipulating Parties"). The Stipulation detailed the settlement of all issues in this Cause. The Stipulation is attached to this Final Order as "Exhibit A."

PUD filed a Motion to Approve Settlement Agreement on September 16, 2016.

On September 22, 2016, the record was opened at the hearing on PUD's Motion to Approve Settlement Agreement. Counsel for PUD requested the ALJ to open the record in Cause Nos. PUD 201300014, EN 201300115, and EN 201500036 together since the Stipulation covers all three (3) causes. No parties objected to PUD's request. The ALJ took evidence in support of the Stipulation. At the conclusion of the hearing, the ALJ expressed her satisfaction with the resolution of the issues through compliance, and recommended the Commission approve the Stipulation.

II. SUMMARY OF ALLEGATIONS

PUD alleged that True Wireless willingly provided Lifeline services to multiple customers with an address that appeared to be outside of True Wireless' service exchange area authorized by the Commission pursuant to Order No. 579913 in Cause No. PUD 200800389.

III. SUMMARY OF EVIDENCE

PUD Witness, Mark Argenbright

Mr. Argenbright testified that he is currently employed by PUD as the Telecom Coordinator. Mr. Argenbright testified that he has previously testified before the Commission and that his qualifications were accepted at that time. Mr. Argenbright testified that he was present during settlement discussions, and that he was testifying in support of the Stipulation and PUD's Motion to Approve Settlement Agreement.

Mr. Argenbright testified that he issued data requests and reviewed information relating to the Cause. Mr. Argenbright testified that True Wireless has implemented corrections and improvements that have resulted in reasonably effective processes to properly enroll subscribers. Mr. Argenbright testified that the Stipulation resolves all issues between the parties in this Cause. Mr. Argenbright testified that the Stipulation is fair, just, reasonable, and in the public interest, and it is PUD's recommendation that the Stipulation be approved.

Mr. Argenbright testified that it is appropriate for the Stipulation to handle Cause Nos. PUD 201300014 and EN 201300115 together due to their similarity. Mr. Argenbright stated that he did not handle Cause No. EN 201500036. Mr. Argenbright also confirmed that True Wireless has corrected their processes, and as of at least July 7, 2016, is operating within the law.

On cross-examination, Mr. Argenbright testified that his participation in these causes began relatively early after commencement of this Cause. Mr. Argenbright testified that these causes basically involved whether subscribers were either within True Wireless' designated service area and/or whether or not the subscribers were perhaps duplicates or multiple subscribers within a single household, and therefore ineligible to receive Lifeline support. Mr. Argenbright stated that it was difficult for companies to determine whether or not people were within the proper service area given the complexities of making such a determination. He stated that it required effort by the company to develop processes to make location determinations as well as to identify potential duplicates, and that these were the things PUD worked with True Wireless to develop. Mr. Argenbright testified that True Wireless was responsive during discussions with PUD to improve their processes, and that True Wireless even took extra steps to immediately address the out-of-area issue. He testified that True Wireless provided good cooperation with PUD.

Upon questioning from the ALJ, Mr. Argenbright testified that the 2013 causes and the 2015 case are all separate types of cases, and that this is not an instance of a company continuing to act badly. Mr. Argenbright testified that the settlement amount was negotiated among the parties, and that there was not a specific calculation. He testified that he did not know the total amount of what any applicable fines could be due to the nature of the investigation and the level of detail that it required to determine duplicates. However, Mr. Argenbright confirmed that he believed the settlement amount was fairly negotiated and reflected the considerable level of cooperation provided by the company.

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

THE COMMISSION FINDS that it is vested with jurisdiction in this Cause, pursuant to OKLA. CONST. art. IX, § 19, and 17 O.S. §§ 1, 2, and 9.

THE COMMISSION FURTHER FINDS that the Stipulating Parties executed a Joint Stipulation and Settlement Agreement, attached hereto as "Exhibit A," and incorporated herein by reference.

THE COMMISSION FURTHER FINDS that the Joint Stipulation and Settlement Agreement reflects a full, final, and complete settlement of all issues in this proceeding.

THE COMMISSION FURTHER FINDS that based upon the record, the Joint Stipulation and Settlement Agreement is in the public interest, and should be adopted as the Order of this Commission.

THE COMMISSION FURTHER FINDS that pursuant to the terms of the Joint Stipulation and Settlement Agreement, and as part of its settlement of Cause Nos. EN 201300115 and EN 201500036, True Wireless agreed to a settlement of the claims presented herein for the total amount of twenty-two thousand and five hundred dollars (\$22,500.00). This payment shall be made within sixty (60) days following the issuance of a Final Order in Cause Nos. EN 201300115 and EN 201500036. No payment is being made as part of the settlement of Cause No. PUD 201300014.

THE COMMISSION FURTHER FINDS that this Cause should be closed.

V. ORDER

THE COMMISSION THEREFORE ORDERS that the Joint Stipulation and Settlement Agreement, attached hereto as "Exhibit A," shall be, and the same is hereby approved and adopted by the Commission.

THE COMMISSION FURTHER ORDERS that pursuant to the terms of the Joint Stipulation and Settlement Agreement, and as part of its settlement of Cause Nos. EN 201300115 and EN 201500036, True Wireless is ordered to make a payment to the Commission in the total amount of twenty-two thousand and five hundred dollars (\$22,500.00). This payment shall be made within sixty (60) days following the issuance of a Final Order in Cause Nos. EN 201300115 and EN 201500036. No payment is being made as part of the settlement of Cause No. PUD 201300014.

THE COMMISSION FURTHER ORDERS that this Cause is hereby closed.

THIS ORDER SHALL BE EFFECTIVE immediately.

OKLAHOMA CORPORATION COMMISSION

Bob Anthony

BOB ANTHONY, Chairman

Dana L. Murphy

DANA L. MURPHY, Vice Chairman

J. Todd Hiatt

J. TODD HIETT, Commissioner

CERTIFICATION

DONE AND PERFORMED by the Commissioners participating in the making of this Order, as shown by their signatures above, this 30 day of November, 2016.

[[SEAL]]

Peggy Mitchell
PEGGY MITCHELL, Secretary

REPORT OF THE ADMINISTRATIVE LAW JUDGE

The foregoing findings, conclusions and order are the report and recommendation of the undersigned Administrative Law Judge.

Mary Candler
MARY CANDLER
Administrative Law Judge

11/30/16
Date

EXHIBIT "A"

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF BRANDY WREATH, DIRECTOR)
OF THE PUBLIC UTILITY DIVISION OF THE) CAUSE NO. PUD 201300014
OKLAHOMA CORPORATION COMMISSION, FOR A)
SHOW CAUSE HEARING AGAINST TRUE)
WIRELESS, LLC.)

FILED
SEP 16 2016
COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

APPLICANT: BRANDY L. WREATH
DIRECTOR, PUBLIC UTILITY DIVISION
OKLAHOMA CORPORATION COMMISSION

RESPONDENT: TRUE WIRELESS, LLC

RELIEF REQUESTED: CONTEMPT)
) CAUSE NO. EN 201300115
)

APPLICANT: BRANDY L. WREATH)
DIRECTOR OF THE CONSUMER)
SERVICES DIVISION OF THE)
OKLAHOMA CORPORATION)
COMMISSION)

RESPONDENT: TRUE WIRELESS, LLC)
)
)
)

RELIEF REQUESTED: CONTEMPT)
) CAUSE NO. EN 201500036
)

JOINT STIPULATION AND SETTLEMENT AGREEMENT

COME NOW the undersigned parties to the above styled proceedings (“the Stipulating Parties”): the Public Utility Division (“PUD”), the Consumer Services Division (“CSD”), the Attorney General of the State of Oklahoma (“AG”), and True Wireless, LLC (“True Wireless”), and present the following Joint Stipulation and Settlement Agreement (“Agreement”) for review and approval by the Oklahoma Corporation Commission (“Commission”) for the resolution of the issues presented in these proceedings, Cause No. PUD 201300014 (the “Show Cause”), Cause No. EN 201300115 (the “PUD Contempt Cause”), and Cause No. EN 201500036 (the “CSD Contempt Cause”) (collectively, the “PUD and CSD Actions”).

The Stipulating Parties represent to the Commission that this Agreement represents a fair, just, and reasonable settlement of the issues contained herein, and that the terms and conditions are in the public interest. The Stipulating Parties urge the Commission to issue an order closing the PUD and CSD Actions, and approving this Agreement in its entirety.

CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

It is hereby stipulated and agreed to by and among the Stipulating Parties as follows:

Neither this Agreement nor any of the provisions hereof shall become effective unless and until the Commission enters an order approving, without modification, the terms and provisions herein, without supplemental or additional terms, conditions and provisions, and thereby closes the PUD and CSD Actions. The provisions of this Agreement are intended to relate only to the specific matters referred to herein, and by and through this Agreement, no party waives any claim or right which it might otherwise have with respect to any matters not expressly provided for herein. Furthermore, no party hereto admits to the correctness or appropriateness of any of the contentions of another party or third party. The Stipulating Parties state and recognize that the Agreement represents a negotiated settlement with respect to the issues presented herein. The Agreement is a balanced compromise of the positions of each party hereto in consideration for the agreements and commitments made of the position of each party hereto and other parties in connection herewith. Accordingly, the Commission shall explicitly recognize that the execution of this Agreement by each party hereto shall not be construed as agreement or acquiescence by any one, or all, of the parties to any particular calculation or issue.

True Wireless was designated as a wireless Eligible Telecommunications Carrier ("ETC") in Oklahoma in Cause No. PUD 200800389. In accordance with its current ETC designation in Oklahoma, True Wireless' authorized geographic Lifeline service area is limited to the service territories of Southwestern Bell Telephone, LP d/b/a AT&T Oklahoma ("AT&T Oklahoma") and Valor Telecommunications of Texas, LP d/b/a Windstream Communications of the Southwest ("Windstream Southwest"). Accordingly, while True Wireless may provide wireless telephone service anywhere within the State of Oklahoma, it is only authorized to receive federal Lifeline support for consumers located within the service areas for which it was designated as a wireless ETC.

In 2013, it came to the attention of PUD that True Wireless appeared to be providing its Lifeline services to some consumers located outside the service territories of AT&T Oklahoma and Windstream Southwest. Upon subsequent analysis by PUD, it was determined that True Wireless provided Lifeline service to, and received federal Lifeline support for, a small percentage of its consumers with addresses outside of True Wireless' authorized service area for Lifeline service. Each of the consumers in the unauthorized area was eligible to receive Lifeline service, but not through True Wireless. PUD further determined that technical limitations in True Wireless' enrollment process and inability to discretely determine consumers address locations were a significant source of these errors. True Wireless has since addressed these limitations. Upon notification that these few consumers were not within its authorized service territory, True Wireless promptly took steps to rectify the situation. True Wireless revised its distribution of Lifeline service in Oklahoma to ensure that only consumers with addresses located within its authorized territory were enrolled in Lifeline service. True Wireless further agreed to decline to enroll any new consumers in its Lifeline service in Oklahoma, and agreed not to seek reimbursement from the federal Universal Service Fund ("USF") for any existing Oklahoma consumers whose addresses were determined to be located outside of its authorized ETC service territory using the technology described below. At the time of the inquiry, there was no reliable method for any wireless carrier to determine whether a consumer was located within

CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

an authorized service territory in the situation of “shared zip codes”. True Wireless worked extensively with PUD to develop a Local Exchange Company (“LEC”) Exchange Boundary/Google Earth mapping program to be used to qualify potential consumers.

PUD also conducted a review of actual subscriber data for November 2013, December 2013, and February 2014, which represent months both before and after the introduction of the National Lifeline Accountability Database (“NLAD”), to test for the presence of potential duplicate records. As a result of this analysis, a face-to-face meeting was held with the company to review five areas of concern along with specific subscriber records. Based on this meeting, it was determined that some subscribers within the sample had already been de-enrolled. It was also determined that some missing information was not required at the time of initial enrollment. The company also performed additional research to resolve other issues. While the analysis did not identify subscribers to which the parties could agree were duplicates, the company did recognize that it could improve its processes to be more accurate and effective. Accordingly, True initiated further process improvements in order to guard against duplicate subscribers, to ensure collection of required forms, and to provide additional management review steps prior to making requests for federal Lifeline support.

Additionally, PUD and CSD conducted a thorough and complete analysis of True Wireless’ marketing activities, including, but not limited to, in-person mobile marketing enrollment events, promotional offers, and reporting of marketing locations.

As a result, the undersigned parties stipulate and agree to the following:

1. PUD reviewed and approves of the processes True Wireless uses to determine whether potential consumers are located within True Wireless’ authorized service area for the provision of Lifeline service.
2. True Wireless has implemented and agrees to continue to utilize these service area verification processes, which consist of the following:
 - All new enrollments/activations of Lifeline service in Oklahoma are, and will continue to be, submitted through the BeQuick platform, which identifies authorized zip codes and their corresponding geographic locations for enrollment purposes. The BeQuick platform restricts processing of an application for activation of new enrollments to approved zip codes.
 - As of December 2013, all enrollments, including in “shared zip codes,” have been, and will continue to be, completed utilizing the FCC LEC Exchange/Google Earth mapping program that has been approved by PUD. Only applications for subscribers within True Wireless’ authorized zip code or for subscribers in “shared zip codes” that pass the mapping program will be submitted and processed for enrollment in True Wireless’s Lifeline service. Results of the Google Earth mapping program are saved to the resulting customer account showing they are within the designated service area in a JPG or PNG format.

CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

- If at any time the customer indicates a change in physical address, the new address is first verified utilizing the FCC LEC Exchange/Google Earth mapping program. A result indicating the new address is located within the Designated Service Area (DSA) is saved to the customer account in a JPG or PNG format. If a result indicates that the new address is located outside the DSA, True Wireless will inform the customer that True Wireless is no longer authorized to provide lifeline service to the customer.
3. To minimize the potential for duplicate customer records, True Wireless implemented and will maintain stringent business rules that include, but are not limited to:
- All True Wireless customers are limited to one (1) active account, regardless of subsidy status. Therefore, a customer may not have an active account receiving subsidy, and an active account not receiving subsidy.
 - In addition, True Wireless has enabled a multi-layered process for determining if a new applicant is a duplicate to an active existing customer within the BeQuick platform. If any of the below combinations result from a search between a new applicant and an existing active customer record the application process will not be allowed to move forward.
 - i. Date of Birth plus last four (4) digits of Social Security Number (SSN)
 - ii. First and Last Name plus last 4 digits of SSN
 - iii. First and Last Name plus Date of Birth
4. True Wireless has provided a detailed explanation of the current process involving its real-time back office process for additional review of all enrollments submitted through the BeQuick platform, which True Wireless agrees to continue to utilize going forward. The back office review of all request for service provided by True Wireless to be enrolled into NLAD (National Lifeline Accountability Database) requires:
- Applicant must reside inside the DSA as described in #2 of this settlement.
 - Applicant must not have an existing active customer record as described in #3.
 - Applicant must provide a current photo ID and proof of enrollment in an OCC approved eligible government program. Acceptable documentation and eligible government programs have been determined by the OCC and the FCC.
 - Applicant must pass or provide documentation to verify identity, as determined by NLAD's use of Lexis Nexis and protocols set forth by USAC for variances of provided Personally Identifying Information (PII) during the identity verification process, through the NLAD platform integrated in the application process through BeQuick.

CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

- The entirety of the application, with the request for enrollment and documents provided by the applicant, will be reviewed in real-time by a True Wireless auditor upon receipt of the application and required documents.
 - Any variance in PII of the applicant will be provided to the applicant by a True Wireless auditor in real-time and attempt to resolve any variance or discrepancy. If the issue cannot be resolved, the application will not be approved until the subscriber provides sufficient information to confirm the validity of the application information.
 - Unapproved accounts are not included on True Wireless' FCC Form 497 filing for reimbursement until all issues are resolved and the account is approved.
5. For the purpose of identifying duplicate accounts, True Wireless is committed to the elimination of duplicate accounts, and will, at a minimum, undertake a monthly review of the active customer database prior to completion of the monthly FCC Form 497 filing. This includes, but is not limited to, the following steps:
- Sorting of all subscriber accounts by DOB, last four digits of the social security number, subscriber last name, and subscriber first name;
 - Verification of subscriber identification documentation for each potential duplicate account;
 - Removal from the active subscriber list and de-enrollment from NLAD of any duplicate account;
 - Providing the department that finalizes the data utilized for the FCC Form 497 with all disconnected accounts;
 - Perform additional analysis to identify and report duplicate accounts that were included in previous FCC Form 497s; and
 - Preparation and filing of Revised FCC Form 497s to remove all identified duplicates from all prior FCC Form 497s.
6. To further enhance its service capabilities, True Wireless is working on a plan to convert to 321Interconnect to interconnect its facilities base network to its underlying wireless carriers' network in order to give True Wireless full control over the routing and termination of its mobile customers' calls using True Wireless' owned facilities.
7. True Wireless has cooperated with PUD and CSD regarding marketing activities in Connection with the CSD Contempt Cause (Cause No. EN 201500036). As part of this settlement, True Wireless agrees that it has completed the following: 1) implemented more robust mobile marketing location reporting processes to ensure PUD and CSD are properly notified of all such locations; 2) implemented more robust mobile marketing training procedures to ensure marketing personnel

CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

are thoroughly familiar with mobile marketing rules including, but not limited to, banner requirements, use of branded apparel, and availability of terms and conditions; 3) ensured True Wireless has appropriate permission for all locations at which mobile marketing is being conducted prior to such activities being undertaken; and 4) ensured True Wireless holds all required city or county licenses necessary for all mobile marketing locations.

8. As part of its settlement of the PUD Contempt Cause (Cause No. EN 201300115) and the CSD Contempt Cause (Cause No. EN 201500036), True Wireless voluntarily agrees to make a payment to the Commission in the total amount of \$22,500.00. This payment shall be made to the Commission no later than sixty (60) days following the issuance of a Final Order of the Commission approving this Agreement. A payment is not being made as part of the settlement of the Show Cause (Cause No. PUD 201300014).
9. The Stipulating Parties submit this Agreement to the Commission as their negotiated settlement of these proceedings with respect to all issues raised within the PUD and CSD Actions filed herein, and all similar issues which could be raised in such causes as of July 7, 2016.
10. The Stipulating Parties agree that the provisions of this Agreement are the result of extensive consultation and collaboration, and that the terms and conditions of the Agreement are interdependent. The Stipulating Parties agree that this Agreement is in the public interest, and for that reason, they have entered into this Agreement to settle among themselves the issues in this Agreement. This Agreement shall not constitute, nor be cited as precedent, nor deemed an admission by any Stipulating Party in any other proceeding, including but not limited to, any future USF Lifeline requests, show cause, state or federal enforcement actions, or other proceedings, except as necessary to enforce its terms before the Commission or any court of competent jurisdiction. The Commission's decision, if it enters an order consistent with this Agreement and closes these PUD and CSD Actions, will be binding as to the matter decided regarding the issues described in this Agreement, but the decision will not be binding with respect to similar issues that might arise in other proceedings. A Stipulating Party's support of this Agreement may differ from its position or testimony in other causes. To the extent there is a difference, the Stipulating Parties do not waive their positions in other causes. Because this is a stipulated agreement, the Stipulating Parties are under no obligation to take the same position as set out in this Agreement in other dockets.

Non-Severability

The Stipulating Parties stipulate and agree that the agreements contained in this agreement have resulted from negotiations among the Stipulating Parties, and are interrelated

CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

and interdependent. The Stipulating Parties hereto specifically state and recognize that this Agreement represents a balancing of positions of each of the Stipulating Parties in connection therewith. Therefore, in the event that the Commission does not approve and adopt the terms of this Agreement in total, and without modification or condition (provided, however, that the affected party or parties may consent to such modification or conditions), this Agreement shall be void and of no force and effect, and no Stipulating Party shall be bound by the agreements or provisions contained herein. The Stipulating Parties agree that neither this Agreement, nor any of the provisions hereof, shall become effective unless and until the Commission enters an order approving all of the terms and provisions as agreed to by the parties to this Agreement, and such order becomes final, and these PUD and CSD Actions are closed.

This Agreement may be executed in counterparts, each of which will be deemed an original, and all of which together will constitute one and the same instrument.

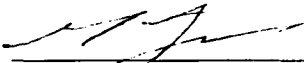
DATED this 16th day of September, 2016.

[Signature Page Follows]

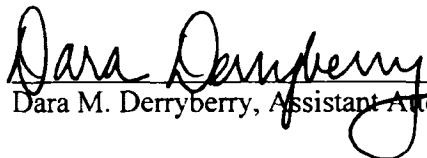
CAUSE Nos. PUD 201300014; EN 201300115; EN 201500036

WHEREFORE, the undersigned Stipulating Parties submit this Joint Stipulation and Settlement Agreement as their negotiated settlement of the issues in the above-styled causes, and respectfully request the Commission approve this Joint Stipulation and Settlement Agreement without change, and issue an order closing these PUD and CSD Actions.

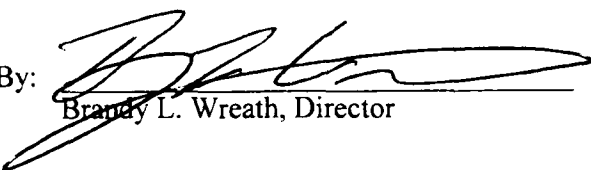
TRUE WIRELESS, LLC

By: 
Michael Fina, President

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

By: 
Dara M. Derryberry, Assistant Attorney General

PUBLIC UTILITY DIVISION
CONSUMER SERVICES DIVISION
CORPORATION COMMISSION OF OKLAHOMA

By: 
Brandy L. Wreath, Director

CERTIFICATE OF ELECTRONIC SERVICE

I, the undersigned, do hereby certify that on the 16th day of September, 2016, a true and correct copy of the above and foregoing was sent electronically, addressed to the following:

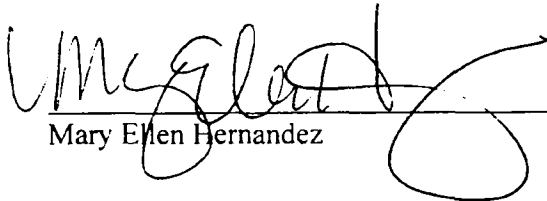
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