

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
FCC Form 325 Data Collection	)	MB Docket No. 17-290
Modernization of Media Regulation Initiative	)	MB Docket No. 17-105
	)	

**COMMENTS**



**AMERICAN CABLE  
ASSOCIATION**

Matthew M. Polka  
President and CEO  
American Cable Association  
875 Greentree Road  
Seven Parkway Center, Suite 755  
Pittsburgh, Pennsylvania 15220  
(412) 922-8300

Mary Lovejoy  
Vice President of Government Affairs  
American Cable Association  
2415 39<sup>th</sup> Place, NW  
Washington, DC 20007  
(202) 603-1735

Ross J. Lieberman  
Senior Vice President of Government Affairs  
American Cable Association  
2415 39<sup>th</sup> Place, NW  
Washington, DC 20007  
(202) 494-5661

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**COMMENTS**



**I. INTRODUCTION & BACKGROUND**

The American Cable Association (“ACA”) hereby submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.<sup>1</sup> ACA and its members are well positioned to comment. ACA represents approximately 750 smaller cable operators and other multichannel video programming distributors (“MVPDs”), including incumbent telephone companies and municipal utilities, most of whom serve smaller communities and rural areas. In aggregate, these operators provide service to close to seven million subscribers, but the vast majority of ACA members serve fewer than 5,000 subscribers,

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<sup>1</sup> *FCC Form 325 Data Collection; Modernization of Media Regulation Initiative*, Notice of Proposed Rulemaking, 32 FCC Rcd 9902 (2017) (“NPRM”).

and half serve fewer than 1,000 subscribers. Of ACA's roughly 750 members, only around twenty operate systems with more than 20,000 subscribers and are thus required by regulation to submit Form 325 each year. The remainder, however, are still required to submit the form when selected to do so by the Commission, and many smaller operators are selected to do so nearly every year. ACA applauds the Commission for its look at its Form 325 reporting requirements. In these comments, ACA urges the Commission to eliminate Form 325, as it no longer serves the purpose for which it was originally intended, and because it creates an unnecessary burden for cable operators, especially small operators with limited resources.

The Commission developed Form 325 in 1965, when it first examined whether to assert jurisdiction over the distribution of television broadcast signals by community antenna television systems ("CATVs") and promulgate rules and regulations governing such distribution.<sup>2</sup> The form was developed as a questionnaire, distributed to each known CATV system, seeking specific information regarding its effective channel capacity, the local television systems which might fall within the carriage provisions of the rules, and the number of channels in use for nonlocal television signals or other purposes.<sup>3</sup> This information was used for the express purpose of determining whether to allow "some kind of transition period before the carriage provisions [were] made fully applicable to microwave and nonmicrowave CATV systems with limited channel capacity," or whether the rules could be adopted without delay.<sup>4</sup> After analyzing

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<sup>2</sup> See generally, *Distribution of Television Broadcast Signals By Community Antenna Television Systems*, Notice of Proposed Rulemaking, 30 Fed. Reg. 6078 (1965) ("1965 NPRM"); *Amendment of Subpart L, Part 91, to Adopt Rules and Regulations to Govern the Grant of Authorizations in the Business Radio Service for Microwave Stations to Relay Television Signals to Community Antenna Systems; Amendment of Subpart I, Part 21, to Adopt Rules and Regulations to Govern the Grant of Authorization in the Domestic Public Point-to-Point Microwave Radio Service for Microwave Stations Used to Relay Television Broadcast Signals to Community Antenna Television Systems; Amendment of Parts 21, 74, and 91 to Adopt Rules and Regulations Relating to the Distribution of Television Broadcast Signals by Community Antenna Television Systems, and Related Matters*, Second Report and Order, 2 F.C.C.2d 725 (1966) ("1966 Order").

<sup>3</sup> 1966 Order, ¶ 103.

<sup>4</sup> 1965 NPRM, ¶ 34.

the responses from 1,031 CATV systems, the Commission was able to determine that most cable CATV systems were already in compliance with the rules, and the majority of those who were not did have sufficient channel capacity to comply without dropping one or more signals, and thus no transition-period was necessary.<sup>5</sup>

Three years later, the Commission proposed to require CATV operators to file similar information on an annual basis, noting that the previously submitted information was out-of-date, and that updated information would “enable the Commission to keep abreast of CATV developments and fulfill its responsibilities in this field, as well as to assist the Congress in its considerations of any legislative proposal.”<sup>6</sup> The Commission formally adopted the annual Form 325 filing requirement in 1971. At the time the requirement was proposed, the Commission noted that “CATV [was] rapidly evolving from its original role as a small, five-channel, reception service” and that cable technology was “on the verge of expanding system capacity to 20 or more channels, and that a variety of new services to the public [were] envisioned.”<sup>7</sup> Given the rapid changes occurring in a still young industry, the Commission understandably felt the need for comprehensive and up-to-date information about CATV operations in order to aid its policymaking decisions.

The Commission has periodically reviewed Form 325, making changes to the submission process,<sup>8</sup> and taking steps to streamline the form and alleviate some of the burdens

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<sup>5</sup> 1966 Order, ¶ 104.

<sup>6</sup> *Community Antenna Television Systems, Development of Communications Technology and Services*, Notice of Proposed Rulemaking, 15 F.C.C.2d 417, ¶ 27 (1968) (“1968 NPRM”).

<sup>7</sup> 1968 NPRM, ¶ 4.

<sup>8</sup> *See Amendment of Part 76 of the Commission’s Rules and Regulations to Alter Cable Television Reporting Requirements*, Order, 61 F.C.C.2d 1014 (1976) (“1976 Order”) (modifying the process by having the FCC send a pre-populated form for cable operators to correct and return within 60 days); *Amendment of the Commission’s Rules for Implementation of its Cable Operations and Licensing System (COALS) to Allow for Electronic Filing of Licensing Applications, Forms, Registrations and Notifications in the Multichannel Video and Cable Television Service and the Cable Television Relay Service*, Report and Order, 18 FCC Rcd 5162 (2003) (“2003 Order”) (requiring Form 325 to be submitted electronically via COALS).

of the filing requirement,<sup>9</sup> but it has been nearly twenty years since the Commission has taken a close look at the utility of Form 325. While ACA agrees with Commissioner Clyburn that, as a general principle, “more data is better than less”<sup>10</sup> when making important policy decisions, the Commission must make sure that their data collection process is efficient and that it serves a specific purpose, so as not to impose unnecessary burdens on regulated entities.

Since Form 325 was first created, the video programming market has evolved. MVPDs of all kinds – traditional cable technology, IP-delivery, and satellite – deliver hundreds of linear programming channels to subscribers in every part of the country, and they face increasing competition from online video distributors who offer video programming in a variety of formats. However, the Commission’s data collection process has not kept up with these changes. Most of the information sought by Form 325 has not recently been used by the Commission in any major policy decisions, and the information that the Commission has used in recent years is, by and large, available from other sources. Moreover, its dataset is increasingly less relevant for evaluating the video programming market and aiding in the Commission’s policymaking decisions because it captures data only from cable operators, who represent a shrinking segment of the market as a whole. Nonetheless, the Commission still requires cable operators to collect and submit this unused data, while there are no similar data collection requirements for competing video programming distributors, such as satellite and online video providers.

In these comments, ACA demonstrates that the Form 325 reporting requirements are no longer necessary, as any information the Commission may need for future regulatory purposes can easily be obtained through other sources, and there is no demonstrable need for the

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<sup>9</sup> See *1998 Biennial Regulatory Review – “Annual Report of Cable Television Systems,” Form 325, Filed Pursuant to Section 76.403 of the Commission’s Rules, Report and Order, 14 FCC Rcd 4720 (1999) (“1999 Order”)* (revising the form and providing relief for small systems by eliminating the annual filing requirement for systems with fewer than 20,000 subscribers, and replacing it with the current system wherein the Commission selects a random sampling of such systems to submit the form each year).

<sup>10</sup> NPRM, Statement of Commissioner Mignon L. Clyburn.

Commission to regularly collect any data that cannot be found elsewhere. Further, submitting Form 325 is burdensome for cable operators, particularly smaller operators, whose limited resources are better spent providing service for their customers. For these reasons, the Commission should eliminate Form 325, or at the very least, it should no longer require small cable operators that own cable systems with fewer than 20,000 subscribers to submit the form when randomly selected to do so.

## **II. FORM 325 HAS OUTLIVED ITS USEFULNESS AND THE PERTINENT INFORMATION GATHERED CAN EASILY BE OBTAINED THROUGH OTHER SOURCES**

There is widespread consensus that Form 325 is unnecessary, and numerous industry commenters have called for its elimination,<sup>11</sup> with no immediate pushback from any parties thus far.<sup>12</sup> The reason for this consensus is clear. Form 325 has outlived its usefulness because, as Commissioner O’Rielly explained, “[a]ll of [the information collected via Form 325] is publicly available from a host of alternative sources, including SNL Kagan, Nielson, and Warren Communications, does not reflect today’s competitive video marketplace, does not apply to cable competitors, and does not serve an actual purpose.”<sup>13</sup> It is therefore appropriate that the Commission now “consider whether the form continues to be useful to the agency’s regulatory and adjudicatory functions[.]”<sup>14</sup>

A close examination of the specific data sought in Form 325<sup>15</sup> supports Commissioner O’Rielly’s claim that the form no longer serves any important regulatory purpose. At least half of

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<sup>11</sup> See *Commission Launches Modernization of Media Regulation Initiative*, MB Docket No. 17-105, Comments of NCTA – The Internet & Television Association at 29-30 (filed Jul. 5, 2017); Comments of Verizon at 17-18 (filed Jul. 5, 2017); Reply Comments of ITTA – The Voice of America’s Broadband Providers at 8-9 (filed Aug. 4, 2017).

<sup>12</sup> See NPRM, ¶ 5 (“No commenters argued in favor of retaining the form.”).

<sup>13</sup> NPRM, Statement of Commissioner Michael O’Rielly.

<sup>14</sup> NPRM, ¶ 6.

<sup>15</sup> Form 325 is organized into five sections - Section I requests Operator Information, including the cable operator’s legal name and mailing address; Section II requests General Information, including physical system ID (“PSID”), subscriber information, equipment information, and plant information; Section III

the data collected by Form 325 is available from other sources, including other required regulatory filings. The rest of the information collected appears to serve little or no regulatory purpose in this day and age, and to the extent that it may be relevant in the future, the Commission can obtain it through the notice-and-comment process or through specific information requests.

*Section I – Operator Information.* The entirety of Form 325's Section I – the operator's legal name, mailing address, city, state, and zip code – can be found in the Commission's Cable Operations and Licensing System ("COALS"). Indeed, it is impossible to see how the Commission could deliver its request for Form 325 to a cable system without already having the information asked for in Section I. The purpose of this section is, presumably, to identify the system providing the substantive data requested in Sections II-IV – that is, to connect the substantive data with the individual system. As discussed below, that substantive data is either irrelevant for current regulatory purpose or is readily available from other sources.

*Section II – General Information.* In Section II, the Commission asks for a system's Public System ID ("PSID"), Subscriber Information (including the extent to which a system is overbuilt), Equipment Information, and Plant Information. As with the information collected in Section I, PSID information is contained in COALS, and in fact the Commission uses PSID numbers to select a random sampling of smaller systems to submit Form 325 each year. Like the Operator Information requested in Section I, a system's PSID is used merely to identify the system to which the substantive information pertains.

Other information collected in Section II can be obtained through commercial sources, such as SNL Kagan, which publishes reports on the number of subscribers and homes

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requests Frequency and Signal Distribution Information; Section IV requests the operator's Channel Line-up; Section V is a certification that the information provided is true, complete and correct to the best of the certifier's knowledge.



passed,<sup>16</sup> deployment of set-top boxes,<sup>17</sup> and cable overbuilder footprints.<sup>18</sup> In its Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, the Commission has used such commercially available information on each of these topics rather than rely on data collected via Form 325.<sup>19</sup> To the extent that the Commission requires more granular, system-specific data to aid in policy-making decisions, it can seek that

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<sup>16</sup> See, e.g., U.S. Cable Subscriber Highlights, SNL KAGAN, <https://platform.mi.spglobal.com/web/client?auth=inherit#industry/cableMSOOperatingMetrics> (subscription required).

<sup>17</sup> See, e.g., Ian Olgeirson, *US cable set-top market clears regulatory uncertainty, shrinking installs loom*, SNL KAGAN, <https://platform.mi.spglobal.com/web/client?auth=inherit#news/article?id=41354410> (Jul. 19, 2017) (subscription required). The Commission has also obtained relevant information from other sources. For example, in its most recent proceeding involving the regulation of set-top boxes, the Commission relied not on Form 325 data, but rather on data collected and made public by Senators Markey and Blumenthal. See *Expanding Consumers' Video Navigation Choices; Commercial Availability of Navigation Devices*, Notice of Proposed Rulemaking and Memorandum Opinion and Order, 31 FCC Rcd 1544, ¶ 13, n.44 (2016), citing Press Release, Sen. Edward Markey, Markey, Blumenthal Decry Lack of Choice, Competition in Pay-TV Video Box Marketplace (July 30, 2015), <http://www.markey.senate.gov/news/press-releases/markey-blumenthal-decry-lack-of-choice-competition-in-pay-tv-video-box-marketplace>. In other set-top box related proceedings, the Commission has relied on information supplied by industry associations rather than Form 325. See, e.g., *Video Device Competition; Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices; Compatibility between Cable Systems and Consumer Electronics Equipment*, Notice of Inquiry, 25 FCC Rcd 4275, ¶ 10, n.21 (2010), citing Letter from Neal M. Goldberg, Vice President and General Counsel, National Cable & Telecommunications Association, to Marlene H. Dortch, Secretary, Federal Communications Commission, CS Docket No. 97-80, at 1 (filed Dec. 22, 2009).

<sup>18</sup> See, e.g., Tony Lenoir, *Mapping US cable overbuilder footprint*, SNL KAGAN, <https://platform.mi.spglobal.com/web/client?auth=inherit#news/article?id=39463115> (filed Feb. 23, 2017) (subscription required). Information on the extent to which cable operators have been overbuilt can also be deduced by using COALS to identify whether a Community Unit ID is served by more than one operator.

<sup>19</sup> See, e.g., *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, Eighteenth Report, 32 FCC Rcd 568, ¶ 20, n. 36-37 (citing to SNL Kagan data related to the number of homes passed by MVPDs); ¶ 190, n. 629 (citing Press Release, Leichtman Research Group, *76% of US Households Have a DVR, Netflix, or use On-Demand* (Jan. 2, 2015), <http://www.leichtmanresearch.com/press/010215release.html>; Press Release, Leichtman Research Group, *81% of US Households Have a DVR, Netflix, or use VOD* (Feb. 5, 2016), <http://www.leichtmanresearch.com/press/020516release.html>; Daniel Frankel, *HDTV Penetration Reaches 81% of U.S. Homes*, FIERCECABLE (Mar. 13, 2015), <http://www.fiercecable.com/cable/hdtv-penetration-reaches-81-u-shome>; ¶ 22, n. 37, citing SNL Kagan, Cable TV Investor (“Eighteenth Video Competition Report”).

information on an *ad hoc* basis, through specific proceedings<sup>20</sup> or through one-time data collections, if necessary.

With respect to the Plant Information requested in Section II, which includes, among other things, the type of delivery system used (i.e., xDSL, fiber to the home, Hybrid-Fiber-Coaxial, etc.) and the length of fiber optic cable plant, it is difficult to see how this information, which was originally aimed at helping the Commission understand systems' channel capacity to determine whether they could meet carriage obligations,<sup>21</sup> is relevant to today's policy-making. To the extent that the Commission still needs information on channel capacity (and it is not clear that it does), the information requested does not correlate with digital technology,<sup>22</sup> and thus can provide very little insight to aid the Commission.

*Section III – Frequency and Signal Distribution.* Section III seeks information on a system's upstream and downstream spectrum, capacity and carriage of analog and digital video channels, the number of digital streams per 6 MHz, and the modulation method used for video delivery. In seeking to find potential uses for this information, the NPRM asks whether it could be used to “enable the Commission to measure a system's competitiveness and aid our policymaking with respect to the cable industry,” and whether “there is a need for the Commission to understand the current capacity of a system, its potential for increases in capacity, and the rate at which new capacity is being delivered into the marketplace over time.”<sup>23</sup> While the Commission should rightly be concerned about competitive trends in the

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<sup>20</sup> Industry associations such as ACA and NCTA – The Internet and Television Association regularly provide the Commission with granular data that the Commission uses in crafting policy. See, e.g., Letter from Barbara S. Esbin, Counsel to ACA, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 12-107, at 9 (filed Mar. 7, 2013) (providing information on the average number of subscribers served by all-analog systems).

<sup>21</sup> See 1966 Order; *Amendment of Part 74, Subpart K, of the Commission's Rules and Regulations Relative to Community Antenna Television Systems; et al.*, Cable Television Report and Order, 36 F.C.C.2d 143 (1972).

<sup>22</sup> NPRM, ¶ 17.

<sup>23</sup> NPRM, ¶ 18.

market for video programming delivery, about which there is ample information publicly available,<sup>24</sup> it should be less concerned about the competitiveness of individual systems. With respect to questions about channel capacity, the NPRM identifies no proceedings or policy decisions in which this information has been used in recent years,<sup>25</sup> and such data should only be collected when it is needed for a specific purpose, rather than collected regularly only to metaphorically sit on the shelf.

*Section IV – Channel Line-up.* The Commission’s tentative conclusion to eliminate the collection of channel line-up information is the correct one,<sup>26</sup> as this information is widely available both from public sources<sup>27</sup> and from cable operators’ public inspection files.<sup>28</sup>

As demonstrated by the analysis above, there is no reason for the Commission to continue its annual collection of Form 325, given the widespread availability of relevant information via alternative sources and the limited utility of the remaining information collected.

### **III. FORM 325 IS UNDULY BURDENSOME, ESPECIALLY FOR SMALL CABLE OPERATORS, AND SHOULD BE ELIMINATED**

In addition to serving little purpose, Form 325 data collection is unduly burdensome, as cable companies must devote considerable resources to compliance that could be more effectively be directed to other business requirements. In its 1999 decision to retain Form 325, the Commission focused not on the burdens that the requirements imposed on cable operators,

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<sup>24</sup> Eighteenth Video Competition Report, ¶ 3, n.2, *citing* SNL KAGAN, U.S. Multichannel Industry Benchmarks (Apr. 27, 2016).

<sup>25</sup> Information about channel capacity was important to the Commission’s early decision-making, and in fact was the primary purpose for the development of Form 325. 1965 NPRM, ¶ 34.

<sup>26</sup> Although a better decision would be to eliminate Form 325 altogether.

<sup>27</sup> *Multichannel SD Channel Lineups Report, Mid-2017*, SNL KAGAN (Sept. 22, 2017), <https://platform.mi.spglobal.com/web/client?auth=inherit#news/docviewer?id=42062758> (*subscription required*).

<sup>28</sup> 47 C.F.R. §§ 76.1705(a)(4), 76.1705. The NPRM also notes that the Commission collects data on modem and telephony subscribers via FCC Form 477 that duplicates information collected via Form 325. NPRM, ¶ 15.

but rather on the benefits of the data to the Commission. In this proceeding, however, the Commission finally asks important questions about the burdens of submitting Form 325, and in particular, about the burdens imposed on smaller cable systems.<sup>29</sup> ACA spoke with many cable operators who have filed Form 325 in recent years to determine the answer to that question, and found that small cable operators generally spend roughly three to five times the number of man-hours that the Commission has estimated the form would require.

There are several reasons for this lengthy timeframe. First, the information requested on the form is not necessarily the type of information that is collected and used during the regular course of business, so it is often not readily available and must be sought out specifically for purposes of Form 325. For example, although operators typically do have channel line-ups readily available, those lists generally do not indicate the format in which each channel is carried (i.e., analog, digital, or HD), and thus that information must be tracked down from other sources. In some cases, information must be collected directly from the physical plant, which is typically separate from office operations, adding travel time to the overall time spent on compliance.

Second, the variety of information collected in Form 325 requires input from multiple business segments that often do not interact on a regular basis, and in some cases are not located in the same building, or even the same city or state. To the extent that a small operator has one or more employees with primary responsibility for regulatory compliance (and many have none at all), these individuals must interface with engineering staff, programming specialists, and administrative teams in order to complete the Form 325 questionnaire. Because personnel from these various departments are less likely to be familiar with the form or its regulatory purposes, regulatory staff must spend the time necessary to educate each individual who must contribute to the submission. As mentioned above, various teams sometimes work in different locations, and all staff members are typically quite busy (particularly

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<sup>29</sup> NPRM, ¶ 8.

among small companies where employees must wear many hats), so even the back and forth necessary to schedule meetings and exchange information can take up valuable time.

Further, once the information is gathered, the seemingly simple act of completing the form can be onerous. In particular, ACA members cited the need to manually input information about their channel line-up. For systems that carry 300 or more channels (as many systems do), completing this portion of the form is extremely time consuming.

As an added burden, some ACA members have reported confusion as to how certain questions should be answered. In particular, systems that deliver video over IP report that because Form 325 was designed before IPTV technology was developed, some of the questions in Section II.4 are not relevant to their plant infrastructure. ACA has identified other issues with the substance of Form 325, such as confusion over what constitutes a “system cluster;” uncertainty over how to report aggregate cable modem and telephony subscribers when a service provider is actually made up of multiple, intertwined entities; and difficulties in determining how to report channel line-ups when an operator’s programming tiers do not align exactly with the limited categories identified in the Form 325 instructions. Grappling with these issues takes time to resolve, and in some cases members reported that their submitted forms were rejected by the Commission and sent back with instructions to amend information, adding even more time to the total number of hours spent on compliance.

Finally, each operator that ACA spoke to considered much of the information requested by Form 325 – particularly the Plant Information required in Section II.4 – to be competitively sensitive, and so, as noted in the NPRM,<sup>30</sup> operators routinely file Motions of Confidentiality along with Form 325. This requires additional man hours, and in some cases the advice and assistance of outside counsel.

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<sup>30</sup> NPRM, ¶ 10.

All in all, the completion of Form 325 imposes a fairly significant burden on cable operators in general, and small operators in particular, as they typically have fewer resources at their disposal to handle regulatory filings. Despite the Commission's attempt to provide relief by requiring submission by only a random sampling of cable systems with fewer than 20,000 subscribers, providers that operate multiple systems often find themselves required to submit multiple filings every year. As such, the burden of the Form 325 requirement is substantial, and the Commission should take this burden into consideration when weighing whether to eliminate the form.

Given the undue regulatory burden that the filing requirement imposes on small operators with limited resources, if the Commission does retain Form 325 in any form, it should exempt entirely systems with fewer than 20,000 subscribers that are not affiliated with large MVPDs.

#### **IV. CONCLUSION**

Because the value of the information collected in Form 325 to the Commission's decision-making is increasingly dubious, as the information, to the extent it is even relevant to policy decisions, can be found from other sources, and because submitting the form is extremely burdensome to cable operators, the Commission should eliminate its requirements related to the submission of Form 325.

Respectfully submitted,



Matthew M. Polka  
President and Chief Executive Officer  
American Cable Association  
Seven Parkway Center  
Suite 755  
Pittsburgh, Pennsylvania 15220  
(412) 922-8300

Mary C. Lovejoy  
Vice President of Regulatory Affairs  
American Cable Association  
2415 39th Place, NW  
Washington, DC 20007  
(202) 603-1735

Ross J. Lieberman  
Senior Vice President of Government Affairs  
American Cable Association  
2415 39th Place, NW  
Washington, DC 20007  
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