

Efforts to Deploy Broadband and Telephone Service to the Least Served in Rural and Tribal Areas

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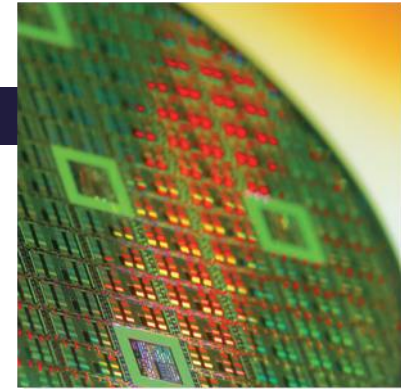
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Will rural Americans have equal access to telephone and broadband service?

CURRENT STATE OF BROADBAND ACCESS IN RURAL/TRIBAL AREAS

Broadband subscription in rural and Tribal areas lags far behind the national average.

As of June, 2011:

- **20M (73%) of the 26.2M Americans who lack access to 3Mbps/768 kbps fixed broadband are in rural areas. *Bringing Broadband To Rural America: Update To Report on a Rural Broadband Strategy*, GN Docket No. 11-16 (June 17, 2011 Update Report to Congress)(“2011 Rural Broadband Report”)**
- **FCC: no access to broadband = lower education levels and lower income than areas that have it.**
- **At least 8% of U.S. rural population (less than 100 persons/sq. mile) are not covered by either 3G or 4G mobile broadband. *Fourteenth Mobile Wireless Competition Report*, para. 355 (2010)(based on advertised rates of coverage)**

Rural/Tribal Areas Trail Far Behind the U.S. Average

Statistics are troubling:

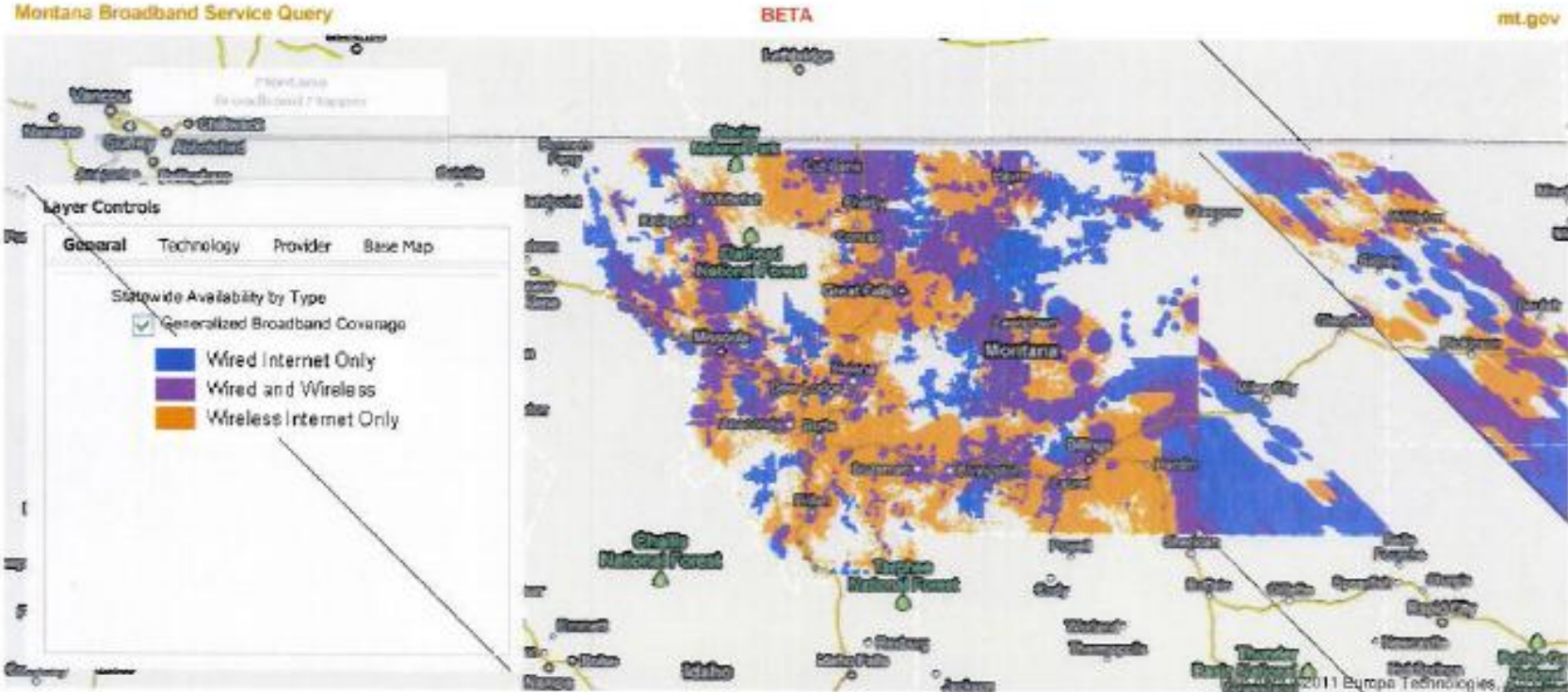
- **Average telephone subscribership: 68% (Tribal lands) v. 98% (national)**
 - Navajo telephone subscribership is 37.4%
- **Access to Fixed Broadband Disparities are Wide:**
 - (a) Montana: total rural population of 440,590 (962,763 total State population)

57% of rural population has no access to **3 Mbps/768 kbps** Fixed Broadband Service; **40% lack 768 kbps/200 kbps** speed. (IN, NM, PR are worse).

42% subscription rate to fixed broadband in Montana rural census tracts to 768 kbps/200 kbps; ID – 39%; WY- 40%; WA – 54% (based on Form 477 Broadband Data as of June, 2010)

App. B & C, 2011 Rural Broadband Report;
 - (b) Tribal Areas: < 10% of Tribal residents have access to wired broadband (vs 95% of most U.S. housing units). *National Broadband Plan* (March 2010)(“NBP”) at 152; (“*Tribal Spectrum NPRM*”, para. 4)(March 2011)

Montana Broadband Map



ARRA Broadband Stimulus – Montana project funding (2010)

- I. **BIP Awards (USDA/Rural Utilities Service)**
 - 1) **Montana Opticom, LLC “Gallatin Gateway Broadband Project” (“Last Mile” BIP award, Aug. 2010)(\$32M grant/\$32M loan)– *fiber-to-the-premises (“FTTP”)* network in Gallatin County, Montana (SW Montana) to expand broadband to rural communities of Belgrade, Manhattan, Four Corners Gallatin Gateway, and others. Voice/video (IPTV) and data at speeds “up to 100 Mbps” to 11,864 households/businesses and to 58 critical community facilities. Partnered with Montana DOT, and had support of Montana Highway Patrol and Gallatin County 911 and local towns.**
 - 2) **Nemont Telephone Cooperative, Inc. “Ft. Peck Reservation FTTP” (Last Mile BIP Award (\$23M grant/\$2.6M Loan)- *FTTP network* in NE Montana, entirely within the Ft. Peck Indian Reservation (remote, rural, underserved). Will provide services to 3279 premises, 42 anchor institutions, including tribal entities, hospitals, educational institutions, government facilities. Up to 100 Mbps service.**

BTOP Award – Montana West Project

II. BTOP Awards (NTIA/U.S. Dept of Commerce)

1) Ronan Telephone Company “Montana West” Project (joint effort of HIE of Montana, Hot Springs Tel. Co., the Blackfeet Reservation and Flathead Reservation) (\$13.8M CCI Project)

- build a 257 mile fiber backbone between Conrad and Missoula; 295 miles of new fiber combined with 434 miles of existing fiber (from Ronan, Hot Springs and HIEM)

- extend fiber for broadband and wireless backhaul to Blackfeet Reservation and the Confederated Salish and Kootenai Native American Tribes. (Ronan/Blackfeet Tribe jointly own Oki Communications wireless provider).

- Local ISPs to use network at 17 POIs; partner with last-mile provider Hot Springs Tel. Co to connect 350 rural households.

Did Broadband Stimulus Benefit Provide Last Mile Broadband Connectivity to Unserved Rural Areas?

- Did broadband stimulus fill the Broadband gap in many areas? Answer:
- Will it fill the Broadband gap in rural areas? Answer:
- Did it benefit Tribal areas? Answer:

Only a few tribes/tribal carriers/carriers serving Tribal areas qualified for ARRA broadband stimulus funding (BTOP or BIP).

- Why?

(1) BTOP favored middle mile architecture; connecting community anchor institutions (benefiting the most people in an underserved region)

(2) RUS BIP application scoring favored existing RUS Title II borrowers (telephone cooperatives).

(a) RUS broadband loan programs will not lend to borrowers in areas where there is an existing Title II borrower (i.e. telephone cooperative).

Stimulus/Traditional Program Funding for Unserved Areas

(3) Poor Sustainability/Limited expertise weighed against many BIP/BTOP applicants – need to show sources of operating income to support loan repayment. (RUS particularly sensitive to low loan default rates).

(4) Better organized applicants with public entity partners/support & existing telecommunications/fiber assets/existing customers/revenues, fared best.

(5) Awards were NOT made based on greatest need, though applicants need to meet specific thresholds of rural or unserved/underserved areas.

DO TRADITIONAL RUS TELECOMMUNICATIONS PROGRAMS PROVIDE LOANS/GRANTS FOR BROADBAND IN THE MOST UNSERVED AREAS?

(a) RUS Telecommunications Programs do NOT support areas of greatest need: A 2009 USDA Inspector General (IG) report found that just 2% of Federal broadband infrastructure funds provided between 2005 and 2008 went toward unserved communities.

(b) USDA's Telecommunication Program rules are not designed to provide funding to areas of greatest need: RUS will not fund a borrower anywhere that there is an existing RUS borrower.

BIP NOFA II SUMMARY

BIP NOFA II Summary

Project Type	Total Applications		Awarded	
	No. Applications	Total Dollars Requested (Millions)	No. Applications	Total Dollars Requested (Millions)
Infrastructure	776	\$11,186.6	236	\$2,465.5
Satellite	27	\$979.9	4	\$100.0
Technical Assistance	51	\$9.4	19	\$3.4
Totals	854	\$12,175.9	259	\$2,568.9

BIP NOFA II Tribal Entity Summary

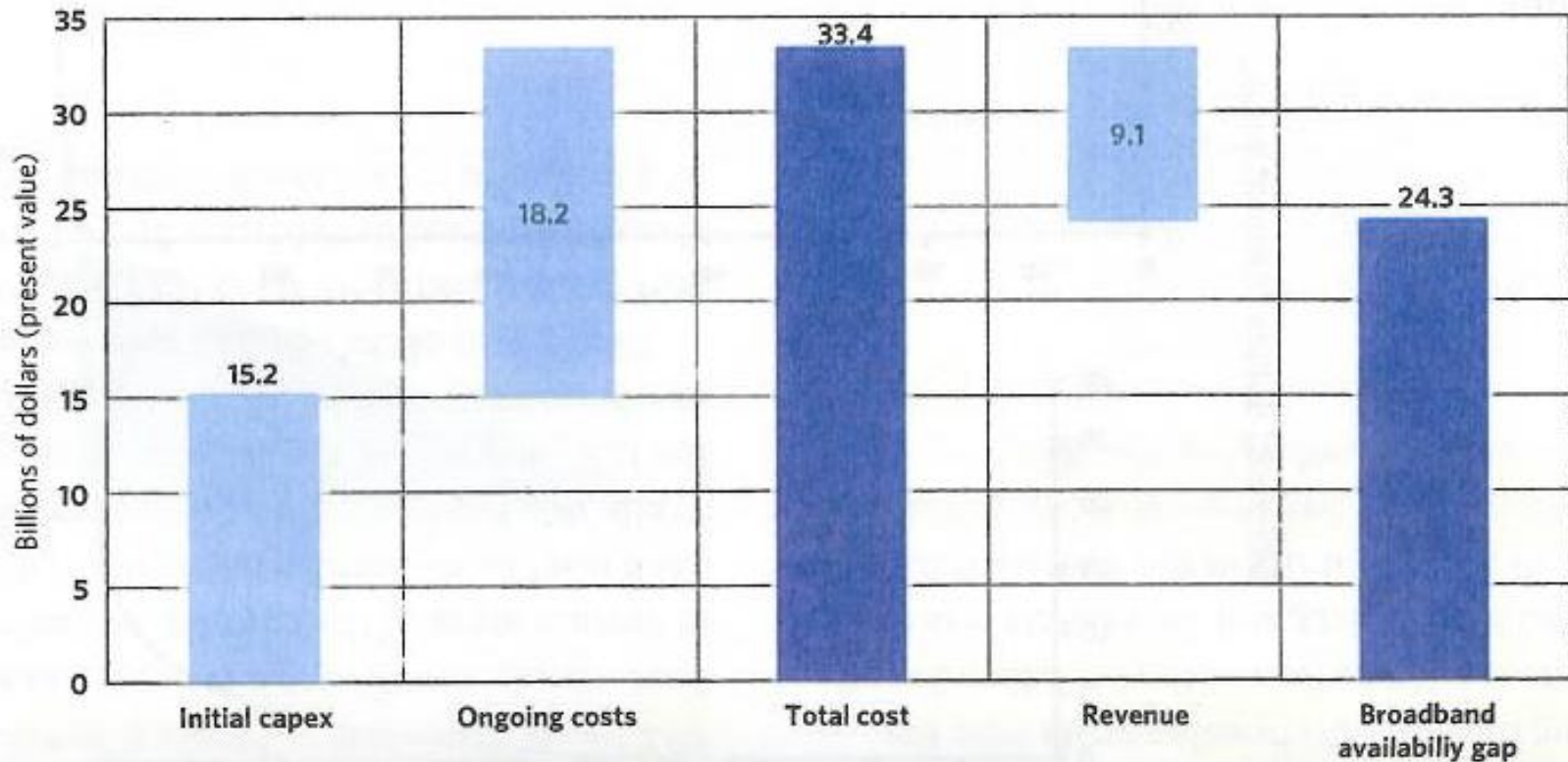
Project Type	Total Applications		Awarded	
	No. Applications	Total Dollars Requested (Millions)	No. Applications	Total Dollars Requested (Millions)
Infrastructure	22	\$213.0	6	\$31.1
Satellite	0	\$0.0	0	\$0.0
Technical Assistance	16	\$2.9	12	\$2.1
Totals	38	\$215.8	18	\$33.2

BIP NOFA II TRIBAL ENTITY AWARD RECIPIENTS

States Served	Project Type	Recipient Name	Grant	Loan	Total Award
AZ	Last Mile	Tohono O'Odham Utility Authority	\$7,730,250	\$2,576,750	\$10,307,000
KS	Last Mile	Iowa Tribe Of Kansas And Nebraska	\$764,833	\$0	\$764,833
NV	Last Mile	Reno-Sparks Indian Colony Inc	\$400,000	\$0	\$400,000
NY	Last Mile	Saint Regis Mohawk Tribe	\$10,034,392	\$528,125	\$10,562,517
OR	Last Mile	Warm Springs Telecommunications Company	\$2,722,960	\$2,722,960	\$5,445,920
AZ	Middle Mile	Hopi Telecommunications Inc.	\$2,544,432	\$1,090,471	\$3,634,903
AK	Technical Assistance	Central Council-Tlingit & Haida Indian Tribes of AK	\$153,112	\$0	\$153,112
CO	Technical Assistance	Ute Mountain Ute Tribe	\$200,000	\$0	\$200,000
ID	Technical Assistance	Shoshone-Bannock Tribes	\$115,000	\$0	\$115,000
MN	Technical Assistance	Mille Lacs Band of Ojibwe	\$47,380	\$0	\$47,380
NV, UT	Technical Assistance	Confederated Tribes of the Goshute Reservation	\$200,000	\$0	\$200,000
OK	Technical Assistance	Cherokee Nation	\$200,000	\$0	\$200,000
OK	Technical Assistance	Kaw Nation-Kaw Enterprise Development Authority	\$177,500	\$0	\$177,500
OR	Technical Assistance	Warm Springs Telecommunications Company	\$200,000	\$0	\$200,000
SD	Technical Assistance	Lower Brule Sioux Tribe	\$195,750	\$0	\$195,750
SD	Technical Assistance	Sisseton Wahpeton Oyate	\$165,000	\$0	\$165,000
WA	Technical Assistance	Quinault Indian Nation	\$200,000	\$0	\$200,000
WA	Technical Assistance	Jamestown S'Klallam Tribe	\$196,320	\$0	\$196,320

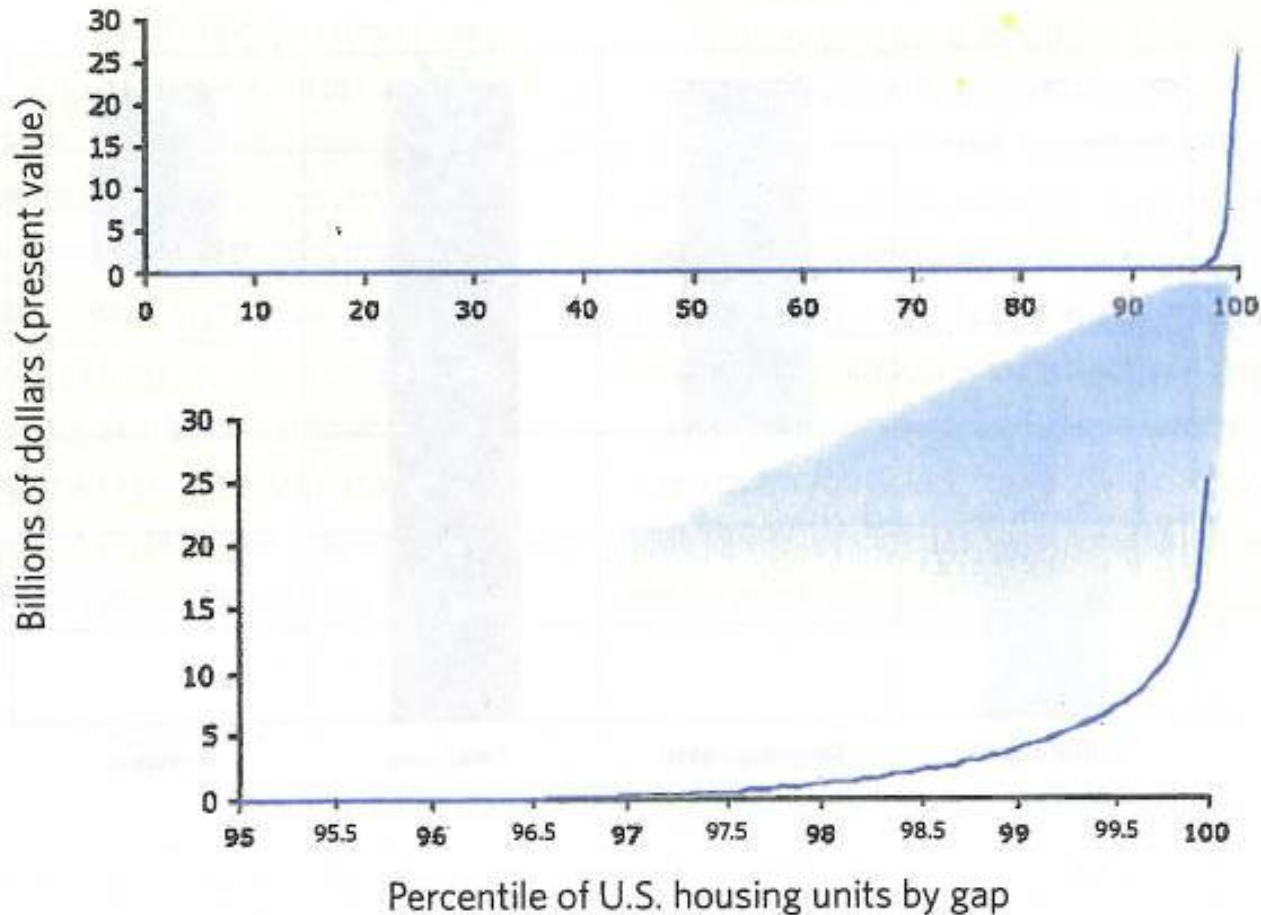
Total \$26,246,929 \$6,918,306 \$33,165,235

CASH FLOWS ASSOCIATED WITH BROADBAND AVAILABILITY GAP



The present value (in 2010 Dollars) of the Broadband Availability Gap is \$24 Billion. (Source: National Broadband Plan at 137.)

BROADBAND AVAILABILITY GAP, by percent of U.S. housing units served



The most expensive unserved housing units represent a disproportionate share of the Total Gap. (Source: National Broadband Plan at 138.)

EXISTING SOURCES OF FEDERAL SUPPORT FOR COMMUNICATIONS CONNECTIVITY

Agency	Program	Description	Annual funding amount
Federal Communications Commission	Universal Service Fund	Provides funding for companies serving high-cost areas, low-income consumers, rural health care providers, and schools and libraries.	\$8.7 billion (FY2010)
National Telecommunications and Information Administration	Broadband Technology Opportunities Program	Grant program to promote deployment and adoption of broadband throughout the country, particularly in unserved and underserved areas. Priority in the second Notice of Funding Availability (NOFA) will be given to middle-mile broadband infrastructure projects that offer new or substantially upgraded connections to community anchor institutions, especially community colleges.	\$4.7 billion (one-time ARRA)—includes at least \$2.5 billion for infrastructure, \$250 million for adoption, and \$200 million for public computing centers.
Rural Utilities Service	Broadband Initiatives Program	Loan, loan guarantee and grant program to increase broadband penetration and adoption, primarily in rural areas. Priority in the second NOFA will be given to last-mile projects, and middle-mile projects involving current RUS program participants.	\$2.5 billion (one-time ARRA)—includes at least \$2.2 billion for infrastructure.
Rural Utilities Service	Telephone Loans and Loan Guarantees Program	Provides long-term, direct and guaranteed loans to qualified organizations, often telephone companies, to support investment in broadband-capable telephone networks.	\$685 million
Rural Utilities Service	Rural Broadband Access Loans and Loan Guarantees Program	Provides loans and loan guarantees to eligible applicants—including telephone companies, municipalities, non-profits and Tribes—to deploy broadband in rural communities.	\$298 million
Institute of Museum and Library Services	Library Services and Technology Act Grants	Provides funds for a wide range of library services including installation of fiber and wireless networks.	\$164 million
Multiple agencies	Other programs ¹⁸	Multiple purposes	\$49 million
Total			\$17.1 billion

(Source: National Broadband Plan at 139.)

THE FEDERAL UNIVERSAL SERVICE FUND

Program	Description	FY 2010 disbursements (projected)
High Cost	Ensures that consumers in all regions of the nation have access to and pay rates for telecommunications services that are reasonably comparable to those in urban areas.	\$4.6 billion
Low Income (Lifeline and Link-Up)	Provides discounts that make basic, local telephone service affordable for low-income consumers.	\$1.2 billion
Schools and Libraries (E-rate)	Subsidizes telecommunications services, Internet access and internal connections to enable schools and libraries to connect to the Internet.	\$2.7 billion
Rural Health Care	Provides reduced rates to rural health care providers for telecommunications and Internet access services and, on a pilot basis, support for infrastructure.	\$214 million
Total		\$8.7 billion

(Source: National Broadband Plan at 140.)

Funds to Maintain Business: Federal Communications Commission (FCC)

FEDERAL COMMUNICATIONS COMMISSION (FCC)

(1) Universal Service Fund

- **High Cost Support – FCC capped CETC high cost support on May 31, 2008 to protect the base.**
 - **Despite cap on CETC High Cost Support, the Commission carved out an exception for providers serving solely tribal lands for uncapped cost recovery support**
- **Lifeline/Linkup – per subscriber subsidy to make telecommunications service more affordable for low income subscribers. Can mean free service for some subscribers.**

Funds to Maintain Business: Federal Communications Commission (FCC)

- (3) Comprehensive USF Reform under National Broadband Plan (2010)
 - FCC proposes phase-out of traditional High Cost ETC support by 2012.
 - High Cost Funds to be used to support broadband deployment in unserved/underserved areas
 - Possible exception for ongoing high cost ETC support in persistently unserved/underserved areas where telephone penetration still lags (i.e. ETCs serving tribal areas were exempted from 2009 cap on new competitive ETCs).

Positive Developments at FCC For Tribes

- **FCC Office of Native Affairs & Policy Established (8/12/10)**

Website: www.fcc.gov/indians

- **FCC-Native Nations Broadband Task Force established to help Guide the Commission on deployment of telephone and broadband service on Tribal lands. (3/3/11)**
- ***Standing Rock Telecommunications* ETC Order**
- **New Tribal Initiatives launched in conjunction with NBP**
 - *Mobility Access Fund NPRM (10/14/10) & Further Inquiry re: Tribal Areas (4/18/11)*
 - *Wireless Spectrum NPRM (3/3/11) – Comments due 5/19/11; Reply Comments 6/20/11*
 - *Native Nations NOI (3/3/11) Comments due 5/19/11; Reply Comments 8/4/11*

Standing Rock ETC Order (June, 2011)

- **Standing Rock Telecommunications, Inc., wholly-owned by Standing Rock Sioux Tribe, built and operates 18 tower CDMA wireless network in 2008-2009 on 4000 sq. mile Reservation.**
- **Low telephone penetration, sparsely populated, limited infrastructure, served by rural telephone companies & Qwest.**
- **SRTI filed ETC Petition in 12/09; Redefinition Petition in 2/10**
- **Partial ETC designation by FCC Wireline Competition Bureau in 8/10 (only for entire wire centers of rural telephone company; redefinition subject to state consent.**
- **SRTI petition for reconsideration. FCC, in June 2011, granted petition:**
 - (1) Designated SRTI as an ETC “immediately” throughout entire Reservation, including partial wire centers (BELOW the wire center level);
 - (2) Held redefinition “unnecessary” if ETC serving entire Reservation. Therefore, no state consent to redefinition needed.

FCC moving forward with NBP Rulemakings to Close Broadband Gap

I. THE CONNECT AMERICA FUND (to be funded from \$4.6B High Cost Fund)

- Provide funding for broadband in those areas where “no private sector business case” for broadband and high quality voice-grade service.
- will consider State USF program support and alternative sources for Tribal, state and local initiatives to support broadband.
- “at most one subsidized provider of broadband per geographic area.”
- eligibility should be *company and technology agnostic*.
- drive funding to efficient levels, including market-based mechanisms (i.e. reverse auctions).
- *Not likely to be a source of funding for wireless ETCs or many Tribal providers if low cost per unit provider selected b/c of high cost of service in Rural/Tribal areas.*
- recipients accountable for funding and must meet enforceable timelines for universal access.

A “separate track” for Tribes Under The Mobility Fund based on Government-to-Government Relationship

- II. **THE MOBILITY FUND (funded from \$4.6B High Cost Fund) - Mobility Fund NPRM (released Oct. 14, 2010)**
 - one-time funding of \$100M - \$300M in funding to support 3G (or better) mobile wireless infrastructure in unserved census block areas (at least 3% below nationwide average of 3G coverage of 98.5%).
 - FCC proposes reverse auction with winners to be decided by lowest per-unit bids across ALL unserved areas (comparing bids against all other bids through across all eligible areas of the country).
 - FCC to “coordinate with American Indian Tribes and Alaska Native Village governments” regarding “separate track” for support of Tribal lands. NPRM, ¶33.
 - Enough \$\$ for significant 3G wireless infrastructure deployment in unserved areas? (30% of \$300 Million = \$90 Million)

Mobility Fund NPRM

- **Comments (December, 2010); Reply Comments (January, 2011)**
- ***Further Inquiry into Tribal Issues Relating to Establishment of Mobility Fund* (rel. 4/18/11) Comments solicited from Tribal governments for filing May 4, 2011. Sought comment on:**
 - **I. Tribal Priorities on Tribal Lands**
 - A. Mechanism for Mobility Fund: Possible “Priority Units” provided to Tribal Governments to ensure that Mobility Fund support best serves Tribal needs.*

Tribes might elect whether to

 - (a) allocate all of priority units to a targeted unserved/underserved census block: i.e. community anchor institution (youth center or public school) or where largest number of unserved residents, etc. or (b) divide total # of priority units among many census blocks according to relative priority.
 - Priority Units will increase likelihood that unserved census blocks will receive funding by allowing bidder to lower its bid.

Further Inquiry on Mobility Fund

- ***B. Whether to require that bidders in a Mobility Fund action demonstrate Tribal governments have been engaged in planning process (NCAI, NPM)***
 - *Needs assessment, deployment planning, coverage to Tribal anchor institutions and communities;*
 - *Feasibility and sustainability planning;*
 - *Marketing supported services in a culturally sensitive manner;*
 - *Rights-of-way processes, land use permitting, facilities siting, and cultural/historic preservation review processes*
 - *Compliance with Tribal business and licensing requirements*
 - Possible bidding credit to qualified Tribally-owned and –controlled providers
- II. Possible Preference for Tribally-Owned Providers**
 - Not an absolute Tribal preference, because support would still be based on lowest per-unit bid.

Tribal Mobility Fund

■ III. Timing of a Tribal Mobility Fund Auction

- Separate Track proposed in NPRM.
- BUT, *Tribal Spectrum NPRM* (released March 3, 2011) has proposals for Tribal access to spectrum over Tribal lands that could benefit from support under Tribal Mobility Fund.

COMMENTS:

- General opposition to reverse auction from Tribal groups.
- Favor separate Tribal Mobility Fund (up to 30% of Total Mobility Fund)
 - (a) higher build-out costs in Indian country (higher cost of deployment costs, poor demographics, climate and geographical challenges), & greater need.
- Require Tribal consultation, and Tribal endorsement, either as (1) condition of application or (2) before construction, with reporting reqts to Tribal Govt and to FCC (i.e. Tribal resolution supporting provider's application for filing with the long form application for Tribal Mobility Funds)

Tribal Mobility Fund

- Establish a Native Nations Priority for the Tribal Mobility Fund - Preference for Tribally-Owned and Controlled Providers (NPM) – prioritize what provider will best serve Tribal lands, not deliver the services most cheaply.
 - (a) Favor “separate track” for Tribal Mobility Fund, but not wait for USF reform or Tribal NOI. (NPM).
 - (b) But Tribal Governments must get adequate and fair share, i.e. 30% of overall Mobility Fund set aside for the Tribal Mobility Fund (NTTA).
- How to Prioritize Tribal Mobility Fun applications? Possible alternative approaches for targeting Tribal Mobility Funding:
 - (A) E-Rate Program (NTTA)
 - (B) Factor-based Approach (Standing Rock Sioux Tribe)

Access to Spectrum on Tribal Lands Rulemaking

- FCC recognizes “additional steps” are necessary to encourage further deployment and use of spectrum for wireless radio services on Tribal lands.
- **Existing programs such as USF Low Income Program (Enhanced Lifeline/LinkUp) and Tribal Lands Bidding Credit Program (8 applicants have received bidding credits of \$8.87M for 51 geographic licenses since 2000), have helped Tribal Providers, but not enough to close the gap with the rest of the U.S.**
- **Without demonstrated spectrum access, Tribal applicants will NOT be able to qualify for funding under Mobility Fund (*Spectrum NPRM*, para. 15).**

I. NEW FCC PROPOSALS FOR SPECTRUM ACCESS OPPORTUNITIES

- A. Expand Tribal Licensing Priority for qualifying Tribal entities designated by Tribal Governments for wireless spectrum licenses (dispositive preference to processing application with no competitive bidding, like Tribal priority for licensing broadcast radio services);**

Spectrum Rulemaking Proposals

- B. Secondary Market Access – Establish a formal negotiation process for Tribes to work with incumbent wireless licensees to bargain in good faith for spectrum access over unserved or underserved Tribal lands.**
 - C. Relicensing Unused Spectrum to Tribal Providers – “*build-or-divest*” req’t for licensees who have met construction requirements of wireless license but are still not offering adequate services on Tribal lands.**
 - Service Deployment Incentives for Licensees**
 - A. Tribal Lands Construction Safe Harbor**
 - B. Modifications to Tribal Lands Bidding Credit Program**
- NO “One Size Fits All” solution – some Tribes may prefer to work with existing licensees to speed construction and service, while other Tribes may prefer relicensing. Build-or-Divest and incentives may encourage better coordination and communication btwn Tribes and licensees.**

Access to Spectrum Licensed to Others

II. ACCESS TO UNDERUTILIZED THIRD PARTY-LICENSED SPECTRUM

Two proposals:

- (a) Subject licensee(s) to a formal “Good Faith” Negotiation Process subject to FCC regulation if licensee refuses a secondary markets transaction by private negotiation;
- (b) “Build-or-Divest” – if licensee holding spectrum on Tribal lands *has met construction requirements* of license but not built out networks to provide service to Tribal lands, Tribe would be able to require licensee to either build out a wireless broadband network or divest spectrum in relevant geographic area.

(a) Good Faith Negotiation Process:

Show proof of failure to bargain in good faith?

Good faith test requires licensee to: negotiation with tribal entity; appoint an authorized negotiating representative to bargain for partition or lease

Good Faith Negotiations for Secondary Market Access

of spectrum; agree to meet; no take-it-or-leave-it proposal; require considered reasons for Tribal entity to reject licensee's offer; written agreement.

Questions:

Test for failure to negotiate in good faith?

Reasonable time period for Good Faith negotiations?

Should Tribe be required to demonstrate financial ability to complete a transaction?

What are the FCC remedies and how to be administered? (Unclear)

Incentives to Licensees – should a licensee receive a credit for meeting overall construction requirement if it leases spectrum rights to a Tribe?

“Build-or-Divest” spectrum option

(b) Build-or-Divest Spectrum proposal

- 1. Triggered by “Notice of Intent” by Tribe delivered by Tribe to Licensee (and FCC), to include date of notice of construction completion.**
- 2. Response by Licensee – stating whether it agrees to extend coverage to Tribal lands or relinquish its authorization to the spectrum on Tribal lands.**
 - If Licensee agrees to extend coverage and fails to do so, loses its authorization for the licensed spectrum with regard to unserved Tribal areas.
 - 3 yrs to provide specified level of service from filing of Notice of Intent? Or should coverage reqts and deadlines be adapted to particular tribal population and geography(comment)
- 3. Technical issues/criteria to be applied to Tribal entity that becomes a Licensee: signal strength; interference; same level of service as original licensee; construction requirements**

Tribal Construction Safe Harbor Provision

- **Safe Harbor proposal:** a licensee that provides a specified level of service to the Tribal land areas may be deemed to have met its construction obligations for its entire service area. (Possible efficient way for licensee to meet license construction deadline before completing buildout of its entire network).

- **Questions:**

Substantial Service Req't for AWS buildout – deploying coverage to 75% of Tribal Lands?

Minimum geographic size and population requirement (i.e. at least 10% of the geographic license area as a whole) for safe harbor to apply?

– “Construction Multiplier” alternative? In addition to, or in lieu of safe harbor, count the population or geographic area of Tribal lands served and multiply by a set % to satisfy construction requirement for license area.

– Tribal Land Bidder Credit Program – extend current 3 yr. construction deadline? Extend timeframe to complete certification process?

Questions?

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Tribal Economic Development Bonds

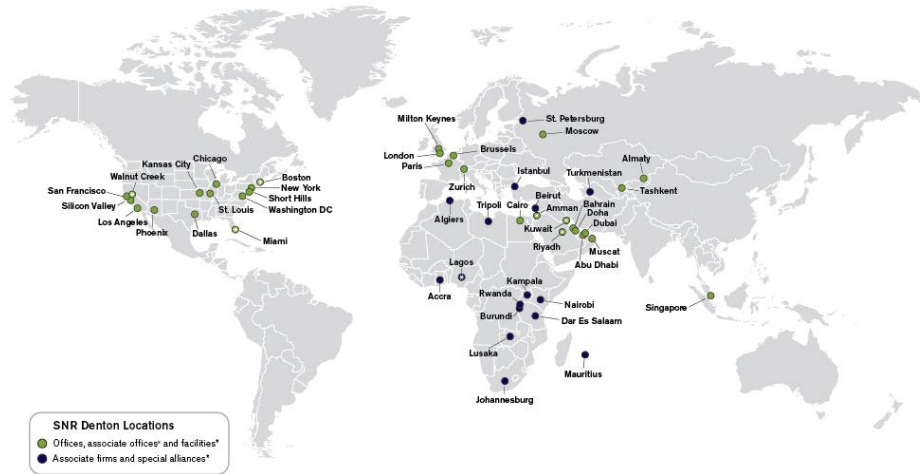
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QUESTIONS?

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