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WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com
PAUL J. SINDERBRAND
psinderbrand@wbklaw.com

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ORIGINAL

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Request Of XM Radio Inc. For Special Temporary Authorization Regarding Digital Audio Radio Service Terrestrial Repeaters* – File No. SAT–STA–20061002–00114
WRITTEN EX PARTE PRESENTATION

Dear Ms. Dortch:

I am writing on behalf of the WCS Coalition in response to a recent *ex parte* memorandum submitted by XM Radio Inc. ("XM") in support of its above-referenced request for a 30-day special temporary authorization ("STA").[1] Grant of that request would legitimize the hundreds of Digital Audio Radio Service ("DARS") terrestrial repeaters that XM has constructed and continues to operate in disregard of Section 301 of the Communications Act of 1934, as amended (the "Communications Act") and the Commission's Rules. Rather, the International Bureau should order XM to immediately reduce the power level of all of its unauthorized repeaters to no more than 2,000 Watts peak equivalent isotropic radiated power ("EIRP") and to utilize low-power repeaters as already authorized under its present STAs to the extent additional repeaters are required to fill gaps in XM's satellite coverage. To do otherwise would reward XM for its misconduct and provide an incentive for XM and others to ignore the limitations imposed by Commission authorizations.

As a procedural matter, the WCS Coalition must again stress that, under the circumstances present here, Section 25.120(b) of the Commission's Rules mandates that the International Bureau place XM's STA request on public notice and afford an opportunity for public comment before it is acted upon. Just last week, the WCS Coalition reiterated to the Bureau the critical importance of issuing a public notice and soliciting public comment whenever

[1] *See* Ex Parte Memorandum of XM Radio Inc. in Support of STA Request, SAT-STA-20061002-00114 (filed Nov. 21, 2006)["XM Memorandum"]. Of course, XM is really seeking an STA that will last far longer than 30 days, as it asks the Commission to grant its request "and leave it in place until it can rule on the pending 180-day STA request. *Id.* at 4.

a DARS licensee seeks an STA that will permit long-term operation of terrestrial repeaters at power levels in excess of 2,000 Watts peak EIRP.[2] In the interest of brevity, the WCA Coalition need not repeat those arguments here. Suffice it to say that solicitation of public comment regarding XM's instant STA request is particularly appropriate here because XM's latest filing trivializes the extent of XM's illegal activities and mis-states the law applicable to the instant STA.

Astonishingly, XM suggests that its construction and operation of hundreds of illegal repeaters largely is "inconsequential from a regulatory perspective."[3] Indeed, XM even goes so far as to suggest that the Commission had given it *carte blanche* to deploy whatever repeater facilities XM wanted, so long as no interference resulted.[4] The facts, however, reveal otherwise. The STAs issued by the Commission to XM were clear on their face – XM had a blanket license to deploy repeaters operating at up to 2,000 Watts peak EIRP, and could construct and operate higher-power repeaters only in accordance with specific technical parameters.[5] Unfortunately, XM's filings to date have been carefully crafted to obfuscate the full extent of its repeated violations of that limitation, and neither the WCS Coalition nor the Commission yet knows all

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[2] *See* Letter from Paul J. Sinderbrand, Counsel to WCS Coalition, to John Giusti, Acting Chief, International Bureau, FCC, SAT-STA-20061107-00133 (filed Nov. 22, 2006). The WCS Coalition's argument there cited a petition for rulemaking submitted by Sirius Satellite Radio Inc. ("Sirius") urging the Commission to "grandfather" from its final DARS repeater rules all repeaters constructed by Sirius and XM pursuant to STAs, while excusing them from their current obligation under those STAs to provide Wireless Communications Service ("WCS") licensees absolute protection against interference. Although XM was not a party to that petition for rulemaking, XM has also urged that position upon the Commission, and thus the arguments advanced by the WCS Coalition against Sirius' 30-day STA are equally applicable here. *See* Letter from Carl R. Frank, Counsel to Sirius, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 95-91 (filed Aug. 14, 2006) ("Sirius/XM Aug. 14 Joint Proposal").

[3] XM Memorandum at 4. *See also id.* at 11 ("[T]he vast majority of the differences between the authorized network and the as-built network are noteworthy only for their insignificance.").

[4] *Id.* at 12 ("[T]he Commission effectively authorized XM to deploy its network in a manner it believed met its service requirements, provided that the repeaters did not cause interference for other licensees."). XM's assertion in this regard is not only absurd on its face, but it is belied by XM's own conduct – on several occasions XM sought modifications to its STAs that would not have been necessary had the Commission granted it the broad discretion XM claims. *See, e.g.,* Request of XM Radio Inc. for Special Temporary Authority to Operate Additional Satellite Digital Audio Radio Service Terrestrial Repeaters, File No. SAT-STA-20031112-00371 (filed Nov. 25, 2003); Request of XM Radio Inc. for Special Temporary Authority to Operate Satellite Digital Audio Radio Service Terrestrial Repeaters in Little Rock, Arkansas and Tulsa, Okalahoma, File No. SAT-STA-20020815-00153 (filed Aug. 1, 2002). XM apparently still does not appreciate the requirements imposed upon it under the Commission's rules. XM contends that it "should have notified the Commission" of the modifications at issue here. XM Memorandum at 8. *See also id.* at 13 ("XM should have informed the Commission of these modifications at the time"). Elsewhere, it suggests that it merely had an obligation "to consult with the Commission about the actual deployment of its network." *Id.* at 9 n.28. None of these statements are correct – XM's STAs did not permit any variation merely upon notice or consultation. Rather, XM was required to seek and secure prior Commission authority before constructing and operating facilities that did not comply with its STAs. For XM not to understand that, even at this late date, should give the Commission pause.

[5] *See XM Radio Inc.,* Order and Authorization, 16 FCC Rcd 16781, 16786 (IB 2001)["*XM 2001 STA Grant*"].

the facts. XM concedes, for example, that between September 23, 2006 and the date it filed its STA request, it made numerous "remedial" modifications to repeater facilities that had been operating unlawfully to bring them into compliance with its STAs.[6] However, despite the fact that questions were raised by the National Association of Broadcasters regarding the extent of XM's illegal operations more than a month ago, XM has yet to disclose the total number of repeaters that had been operated unlawfully before those remedial measures, the specific repeaters that had been operated unlawfully, and the nature or duration of the unlawful operation.[7] Instead of providing this critical information, XM continues to play a shell game with the facts.[8]

Nonetheless, the facts that are before the Commission speak volumes. While XM's latest filing attempts to focus attention on some of the less material violations, the Commission must look beyond XM's attempt to sugar-coat its activities and instead consider the following undisputed facts:

- XM had been operating at least 221 terrestrial repeaters at power levels in excess of that authorized by its present authorizations.[9] Indeed, because XM states that it has merely "taken steps to eliminate some of the largest variances," it is not clear whether in fact far more repeaters have been operated at excessive power levels.[10] Even today, XM continues to unlawfully operate two repeaters at unauthorized power levels, despite its recognition that such operations are illegal.[11]

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[6] *See* Request Of XM Radio Inc. For Special Temporary Authority to Operate Satellite Digital Audio Radio Service Terrestrial Repeaters, File No. SAT–STA–20061002–0014, at 3-4 (filed Oct. 2, 2006)["XM STA Request"].

[7] *See* Letter from David K. Rehr, President & CEO, Nat'l Ass'n of Broadcasters, to Hon. Kevin J. Martin, Chairman, FCC, at 2-3 (dated Oct. 23, 2006)["NAB *Ex Parte* Letter"].

[8] XM would have the Commission ignore its blatant violations of Section 301 of the Communications Act and the Commission's Rules and grant the instant STA on the theory that "the Commission would likely have granted XM STA authority for the 'as-built' network had XM sought such authorization at the time." XM Memorandum at 9. *See also id.* at 12 ("[T]here is little doubt that the Commission would have granted an STA for the as-built network had it been asked to do so."). While the WCS Coalition will refrain from rank speculation as to what the Commission might or might not have done had XM complied with the Communications Act and the Commission's rules, XM's statement raises a critical question – if XM is so certain that the Commission would have authorized its modifications, why did XM not file a request with the Commission for modification of its STAs? Although that question has been before the Commission for more than a month now, XM has yet to answer. *See* NAB *Ex Parte* Letter at 2-3.

[9] *See* XM STA Request at 2; XM Memorandum at 4.

[10] *See* XM STA Request at 2.

[11] *See* XM STA Request at 2; XM Memorandum at 4. In a startling display of hubris, XM suggests that its operation of these 221 or more terrestrial repeaters at unauthorized power levels should be excused by the Commission because XM chose not to construct other authorized repeaters, and thus its network, taken as a whole, operates at less power than authorized. *See* XM Memorandum at 2, 11. XM elected not to construct hundreds of authorized

- XM has been operating approximately 142 separate repeaters that were constructed at locations that differ by at least five seconds from that authorized by the FCC. In addition, it is reasonable to assume from XM's careful phrasing that XM also has been operating an untold number of repeaters at unauthorized locations within five seconds of that permitted by its STAs.[12] XM is requesting authority to continue operating all of these unlawful repeaters.

- XM has been operating 19 repeaters that are not authorized at all, and continues to unlawfully operate 4 of those repeaters despite its acknowledgement of their illegality.[13] XM's proposed STA would permit 12 of those illegally-constructed repeaters to continue operating.[14]

Given XM's flouting of the Commission's rules, XM defies credulity when it suggests that a failure by the Commission to authorize its illegal operations would be inconsistent with precedent and "distort existing law."[15] To the contrary, the Commission has made clear that it is under no compulsion to grant an STA that will legitimize unlawful conduct.[16] In fact, not one of

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repeaters, and constructed others that had operated at power levels lower than authorized not out of beneficence or concern over interference, but likely because it was far less expensive to do so (even if it meant violating the Commission's rules).

[12] According to XM, it has highlighted in yellow those "repeaters operating at a location differing more than 5 seconds from [an] authorized location." XM STA Request at 3. There are 154 repeaters for which the coordinates are highlighted in yellow (including 12 for which there was no prior authorization). However, there are a total of 794 repeaters listed in Exhibit A. The careful wording of XM's filing strongly suggests that other repeaters identified in Exhibit A are located less than five seconds distant from authorized locations, although XM does not highlight those instances. Certainly, any investigation of XM's behavior should require a full disclosure by XM of all repeaters constructed at a location different from that authorized, and the International Bureau should be advised precisely which repeaters are constructed at unauthorized locations, and how far they are removed from the authorized sites.

[13] *See id.* at 2; XM Memorandum at 4.

[14] In addition, XM concedes that it is operating 79 repeater locations with transmission antennas mounted at heights different than that authorized by the Commission. *See* XM STA Request at 3, Exhibit A. It is not clear whether any of these improper antenna mountings implicate the Part 17 Rules governing the safety of air navigation, and XM has failed to identify with respect to these 79 repeaters whether the antennas were mounted higher or lower than authorized. In addition, XM has conceded that 81 antennas have been installed that do not comport with the type of antenna authorized and that 92 antennas have been constructed with a downtilt not authorized by the Commission. *Id.* XM has not identified in how many of these cases the constructed beamwidth exceeds that authorized by the Commission. In addition, XM has installed at 21 repeater sites a second or third, unauthorized transmission antenna that it desires to continue operating. *Id.* Again, XM has not identified in how many of these cases the constructed beamwidth exceeds that authorized by the Commission. Moreover, it is unclear whether XM had installed and operated additional, unauthorized antennas at other repeater locations but ceased utilizing such antennas as part of its remedial program.

[15] XM Memorandum at 1.

[16] *See Comsat Corporation*, Order, 13 FCC Rcd 319, 323-24 (1998).

the cases cited by XM involves the Commission authorizing continued operation of facilities that were constructed and being operated in violation of the Commission's rules. For example, the 1998 *Direct Broadcasting Satellite Corporation* and the 2003 *EchoStar Satellite Corporation* cases relied upon by XM involved requests by Direct Broadcast Satellite ("DBS") licensees to temporarily engage in transmissions outside the terms of their Commission authorizations. In neither of these cases was the Commission asked to permit continuation of illegal operations – in both cases the licensee properly sought Commission authorization before it commenced operations for which it was not previously authorized.[17]

The *AMSC Subsidiary Corporation* cases relied on by XM are no different. There, AMSC Subsidiary Corp. ("AMSC") had been operating mobile earth terminals ("METS") to provide land mobile-satellite service ("LMSS") over satellite facilities leased from others. Upon the launch by AMSC of its first satellite, AMSC sought an STA that would permit it to operate certain of those METS in conjunction with AMSC's own satellite. Again, unlike the case here, AMSC did not modify its network first and ask permission later – it followed the Commission's rules and secured permission from the Commission before it migrated its METS from the leased satellite capacity to its own.[18]

Similarly, in the 1996 *Columbia Communications Corporation* case cited by XM, Columbia Communications Corp. ("Columbia") was not operating facilities in violation of its Commission authorization when it sought its STA. However, Columbia believed that continued operation in compliance with certain limitations imposed on Columbia's authorization threatened its viability, and it sought an STA that would permit it in the future to operate free of those conditions. Finding that Columbia had no other option but to operate free of those restrictions, the Commission granted Columbia an STA.[19] Thus, this decision can be distinguished from the

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[17] *See Direct Broadcasting Satellite Corp.*, Memorandum Opinion and Order, 13 FCC Rcd 6392 (IB 1998)["*Direct*"]; *EchoStar Satellite Corp.*, Order and Authorization, 18 FCC Rcd 19825 (IB 2003)["*EchoStar*"]. Interestingly, the Bureau in both decisions required the DBS licensee to specifically notify its customers that its use of these particular channels was temporary and could be eliminated without prior notice. *See Direct*, 13 FCC Rcd at 6395; *EchoStar*, 18 FCC Rcd at 19828. The Bureau found that these notices were required "to avoid confusion or disruption." *Direct*, 13 FCC Rcd at 6395; *EchoStar*, 18 FCC Rcd at 19828. Despite its reliance on these cases, however, XM has not offered to provide notice to its subscribers that its terrestrial repeater network is being operated pursuant to temporary authority and that XM may be required to cease operation of its repeaters without notice. If the Commission is disposed towards granting XM a 30-day STA to cover its illegal operations, it should condition that STA on the provision of such a warning.

[18] *See AMSC Subsidiary Corp.*, Order and Authorization, 10 FCC Rcd 10458 (IB 1995), *modified on recon.* Order on Reconsideration, 11 FCC Rcd 5527 (IB 1995).

[19] *See Columbia Communications Corporation,* Order and Authorization, 11 FCC Rcd 13710 (IB 1996). The 2005 decision involving Columbia is cut from the same cloth. There, consistent with the policies governing satellite facilities, Columbia sought to modify its authorized operating parameters, extend an STA allowing operation of one satellite and to commence testing of a second satellite. *See Columbia Communications Corporation*, Order and Authorization, 20 FCC Rcd 1863 (IB 2005). Columbia had not violated any Commission rule or policy, and its STA requests were not intended to secure an after-the-fact blessing of illegal operations. Moreover, XM defies credulity

present case in two respects. First, unlike Columbia, XM unilaterally decided to operate outside the scope of its authorization before seeking an STA. Second, unlike Columbia, XM does have alternatives – it can take advantage of its blanket authorization for repeaters operating at up to 2,000 Watts peak EIRP.

Denying XM's STA request and requiring XM to bring its unauthorized repeaters and all future deployments into compliance with a 2,000 Watt peak EIRP limit would not only be lawful, but it would be sound public policy. The record before the Commission in IB Docket No. 95-91 clearly establishes that DARS terrestrial repeaters operating at power levels in excess of 2,000 Watts peak EIRP pose an unreasonable risk of interference to nearby WCS operations.[20] In granting XM and Sirius the STAs that authorized their terrestrial networks, the Commission recognized that risk. Thus, the STAs were *expressly conditioned upon XM and Sirius curing any interference they might cause in the future to WCS facilities*, and the Commission explicitly warned both Sirius and XM that any facilities built pursuant to their STAs would have to be modified to comply with future rules governing DARS terrestrial repeaters.[21] Nonetheless, XM and Sirius have recently advocated the adoption of final terrestrial repeater rules that would stand that approach on its head – Sirius and XM would be permitted to continue operating their

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when it suggests that the Bureau's recognition in that case of the long lead-time involved in the design and construction of satellites is at all relevant here. *See* XM Memorandum at 7. The facilities involved here are all terrestrial, and the time it takes to design, construct and launch a satellite cannot be used by XM as an excuse for its illegal construction and operation of the repeaters at issue.

[20] *See, e.g.,* Letter from Karen L. Gulik, Counsel to AT&T Wireless Services, Inc., to Thomas Sugrue, Chief, Wireless Telecommunications Bureau, FCC, IB Docket No. 95-91, at 1-7 (filed Aug. 9, 2001); Letter from Karen L. Gulik, Counsel to AT&T Wireless Services, Inc., to Magalie Roman Salas, Secretary, FCC, IB Docket No. 95-91, at 6 (filed Feb. 20, 2001); Letter from Karen L. Gulik, Counsel to AT&T Wireless Services, Inc., to Magalie Roman Salas, Secretary, FCC, IB Docket No. 95-91 (filed April 30, 2001); Comments of BellSouth Corporation, File Nos. SAT-STA-20010712-00063, SAT-STA-20010724-00064, at i-ii (filed Aug. 21, 2001); Letter from Karen B. Possner, BellSouth Corporation, to Magalie Roman Salas, Secretary, FCC, IB Docket No. 95-91 (filed May 18, 2001); Opposition of WorldCom, Inc., to STA Request, File Nos. SAT-STA-20010712-00063, SAT-STA-20010724-00064, at 1 (filed Aug. 21, 2001); Letter from Karen B. Possner, BellSouth Corporation, to Magalie Roman Salas, Secretary, FCC, IB Docket No. 95-91 (filed Aug. 28, 2001); Letter from Paul J. Sinderbrand, Counsel to Wireless Communications Ass'n Int'l, Inc., to Magalie Roman Salas, Secretary, FCC, IB Docket No. 95-91 (filed Oct. 2, 2001); Letter from the WCS Coalition, to Magalie Roman Salas, Secretary, FCC, IB Docket No. 95-91 (filed Nov. 2, 2001); Comments of the WCS Coalition, IB Docket No. 95-91 (filed Dec. 14, 2001); Reply Comments of the WCS Coalition, IB Docket No. 95-91 (filed Dec. 21, 2001); Letter from the WCS Coalition, to William Caton, Acting Secretary, FCC, IB Docket No. 95-91 (filed Feb. 4, 2002); Letter from the WCS Coalition, to William Caton, Acting Secretary, FCC, IB Docket No. 95-91 (filed Feb. 19, 2002). Indeed, in granting XM its initial STA, the Commission acknowledged that there are areas around terrestrial repeaters where WCS equipment will be susceptible to interference and required Sirius to cure any interference its terrestrial repeaters caused. *XM 2001 STA Grant,* 16 FCC Rcd at 16785.

[21] *See XM 2001 STA Grant,* 16 FCC Rcd at 16787; *Sirius Satellite Radio, Inc.*, Order and Authorization, 16 FCC Rcd 16773, 16777 (IB 2001)["*Sirius 2001 STA Grant*"], *modified on recon.* Order, 16 FCC Rcd 18481 (IB 2001); *XM Radio Inc,* Order and Authorization, 19 FCC Rcd 18140, 18143 (IB 2004).

existing repeaters *ad infinitum*, but would no longer be required to cure any resulting interference to WCS.[22]

While it is fortunate that XM's illegal operations are not located in close proximity to any operating WCS facility, they are all located in areas where it is highly likely WCS will be deployed in the near future. As the Commission is well-aware, the lack of final rules governing DARS terrestrial repeaters has forced WCS licensees to deploy systems at locations where there are no DARS terrestrial repeaters, and continues to hinder efforts by the WCS community to complete the design, development and standardization of equipment.[23] For the WCS spectrum at 2.3 GHz to achieve its potential as a viable, globally-harmonized home for broadband wireless services, ubiquitous coverage will be required, and that, in turn, will require the construction of WCS facilities in proximity to DARS terrestrial repeaters.[24] Thus, there is no doubt that if XM is permitted to continue operation of its illegally-constructed high power repeaters, in time XM will cause harmful interference to WCS-based broadband offerings. In other words, the disclosure of XM's unlawful operations allows the Commission to create an environment in which WCS and DARS terrestrial repeaters can coexist.

As a matter of public policy, the best approach is to require XM to immediately reduce the power level of all of its unauthorized repeaters to no more than 2,000 Watts peak EIRP and to utilize low-power repeaters as already authorized under its present STAs to the extent

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[22] *See* Sirius/XM Aug. 14 Joint Proposal. In addition, just days after disclosing the unlawful construction and operation of eleven repeaters, Sirius submitted to the Commission a "Petition for Rulemaking, and Comments" that, among other things, would "grandfather" these repeaters by exempting them from whatever final rules the Commission adopts to govern DARS terrestrial repeaters, but not continue Sirius' absolute obligation under its present STAs to protect WCS from harmful electrical interference. *See* Petition of Sirius Satellite Radio Inc. for Rulemaking, and Comments, IB Docket No. 95-91 at 6 (filed Oct. 17, 2006). On November 7, 2006, the WCS Coalition submitted its preliminary views regarding Sirius' petition. For present purposes, suffice it to say that the WCS Coalition stressed that "nothing in the Sirius Petition alters the WCS Coalition's view that the DARS licensees should not be permitted to operate those repeaters *ad infinitum* unless they also remain subject to their current obligation to cure any interference that may be caused to future WCS deployments." Letter from Paul J. Sinderbrand, WCS Coalition Counsel, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 95-91 at 3 (filed Nov. 7, 2006) (citation omitted).

[23] *See* Request of AT&T Inc., BellSouth Corporation, Comcast Corporation, NextWave Broadband Inc., NTELOS, Inc., Sprint Nextel Corporation, Verizon Laboratories Inc., and WaveTel NC License Corporation for Limited Extension of Deadline for Establishing Compliance with Section 27.14 Substantial Service, WT Docket No. 06-102, at 5-6 n.12 (filed March 22, 2006).

[24] *Id.* Because the Commission has yet to act upon the WCS Coalition's long-pending request for an extension of the July 21, 2007 deadline by which WCS licensees must establish that they are offering "substantial service," it is likely that the rate of WCS deployment will accelerate over the coming months (albeit with sub-optimal systems), substantially increasing the potential for harmful interference from Sirius' illegally-constructed high-power repeaters. However, because the requested extension is for only three years (measured from the later of the current deadline or the adoption of final DARS terrestrial repeater rules), interference from high-powered DARS repeaters will become a reality in short order, one way or another.

additional repeaters are required to fill gaps in XM's satellite coverage. XM wrongly would have the Commission believe that "[f]ailure to grant the STA Request would degrade satellite radio services for hundreds of thousands of consumers."[25] Today, without any further action by the Commission, XM is authorized by its current STAs to provide service in the affected areas through use of repeaters operating at power levels up to 2,000 Watts peak EIRP.[26] In other words, XM can replicate the coverage provided by its unlawful repeaters through the simple expedient of reducing the power level of those repeaters to 2,000 Watts peak EIRP and installing additional repeaters to provide any necessary additional coverage. Given that XM currently has blanket authority to construct and operate repeaters operating at or below 2,000 Watts peak EIRP, XM has failed to establish that there are any extraordinary circumstances (as required by Section 25.120(b)) that would justify grant of the instant STA request.

In short, rather than legitimize XM's illegal construction and operation of hundreds of high-power repeaters, the Commission should deny the instant STA request (after having sought and considered full public comment). XM will be able to provide terrestrial service in those areas it is today operating unlawfully by using repeaters operating at no more than 2,000 Watts peak EIRP under its current blanket STA. Should you have any questions regarding this submission, please contact the undersigned.

Respectfully submitted,

Paul J. Sinderbrand

Counsel to the WCS Coalition

cc: Fred Campbell
Emily Willeford
John Branscome
Bruce Gottlieb
Barry Ohlson
Aaron Goldberger
Angela Giancarlo
John Giusti
Julius Knapp
Catherine W. Seidel
Rod Porter
Gardner Foster

[25] XM Memorandum at 2.

[26] *See XM 2001 STA Grant*, 16 FCC Rcd at 16787.

Cassandra Thomas
Karl Kensinger
Joann Lucanik
Stephen Duall
Shabnam Javid
Robert Nelson
Bruce Romano
Cathleen Massey
Roger Noel
Scott B. Harris