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June 15, 2018

Via Federal Express
City of Beacon City Council
Beacon City Hall
1 Municipal Plaza
Beacon, New York 12508

RE: Proposed Local Law to Add Section 223-26.4 of the Code of the City of Beacon Concerning Small Cell Wireless Facilities ("Small Cell Law")

Dear Mayor Casale and Members of the City Council:

Our firm represents Orange County-Poughkeepsie Limited Partnership DBA Verizon Wireless ("Verizon Wireless"). By letter dated May 23, 2018, we provided specific comments on the draft Small Cell Law for the Council's consideration.

The purpose of this letter is to supplement and expand upon our May 23rd letter.

As set forth in greater detail below, we want to make sure that the City Council is aware of the following points as they relate to the proposed Small Cell Law.

1. Municipally owned rights-of-way are held for the benefit of the public.
2. Utility companies have a long history of locating infrastructure in municipally owned rights-of-way.
3. Verizon Wireless is entitled to use and occupy municipally owned rights-of-way pursuant to the requirements of the New York State Transportation Corporations Law.

4. Federal law requires local municipalities to treat wireless facilities on a competitively neutral and non-discriminatory basis relative to traditional utilities.
5. New York State law authorizes an existing utility company to grant a right to a wireless service provider to use a portion of its infrastructure for purposes of wireless service.
6. Municipalities are generally not required to consent to the granting of a license or right to use existing utility company infrastructure, nor is the municipality entitled to compensation for such transaction.
7. Imposing annual fees, as currently proposed in the Small Cell Law, without providing any information to demonstrate that such fees are limited strictly to cost recovery, violates established New York State decisional law.
8. The annual fees currently proposed are extremely high when compared to the fees established by the majority of states that have enacted small cell facility laws.

Background

There are historical and significant reasons for placing utility facilities of all kinds within public rights-of-way. Municipalities that own public rights-of-way do so for the benefit of the public. Location of telephone, electric and other utilities in existing public rights-of-way represents a significant public benefit (i.e. providing necessary utility service to local users). Placement of such facilities within an existing public right-of-way is also generally the most efficient option for construction and maintenance of local utilities. In addition, where use of the public right-of-way is feasible, such use avoids the need to construct and operate facilities on private property and the attendant inconvenience to the landowners within the municipality. For wireless facilities, in particular, placement of facilities within the public right-of-way has an important engineering justification: the density of users is generally greatest near such rights of way; and, if antennae and related equipment could not be placed within the right-of-way, such infrastructure would have to be located on private property very near the right-of-way.

Installation of wireless facilities within the public rights of way serve an additional public policy purpose in that it often facilitates co-location of such facilities on existing wooden utility poles. In many cases, existing utility poles can be utilized to readily accommodate the minor antenna and equipment requirements of a small cell facility. In certain circumstances, such as required by the two pending applications proposed by Verizon Wireless, existing utility poles require replacement for structural purposes or minor height increases. In either case, the intrusion upon the community is extremely minor in nature.

Competitively Neutral and Non-Discriminatory Manner of Regulation

Federal law prohibits state or local actions that would erect substantial barriers to wireless facilities deployment, including prevention of a wireless provider from competing on a level playing field with others.[1] Under federal law, regulation need not be an absolute preclusion

[1] The federal Telecommunications Act of 1996, codified at 47 U.S.C., was enacted "to open up markets to competition by removing regulatory barriers to entry... To provide for a pro-competitive, de-regulatory national policy framework designed to accelerate rapidly private sector deployment of advanced information technologies and services to all Americans by opening all telecommunications markets to competition." (Conference Report, telecommunications act of 1996, House of Representatives, 104th Congress, 2d Session, H. Rept. 104-458, at p.1).

to be found unlawful.[2] Federal law requires management of public rights-of-way to be conducted on a competitively neutral and non-discriminatory basis.[3] Thus, a wireless carrier can be neither denied access nor charged more for the same rights and services than a traditional utility. To be competitively neutral and non-discriminatory, the City of Beacon is required to treat the proposed VZW infrastructure improvements similar to the manner in which the traditional utilities (land-line telephone and electric, etc.) are treated relative to zoning permits and approvals.

One of the cornerstone issues of the draft Small Cell Law relates to the proposed scope of regulation of small cell facilities within the city of Beacon. In our May 23rd letter, we explained that the right of Verizon Wireless, and other wireless carriers, to use and occupy public rights of way must be on the same terms and conditions as traditional "wire-line" utilities, including telephone, electric and cable television providers.

We recently submitted a request pursuant to Article 6 of the Public Officers Law ("Freedom of Information Law" or "FOIL") requesting copies of any and all right of way agreements between the city and traditional utility providers that occupy city-owned rights of way. We are told that a response will be provided by Sunday, June 24th, 2018. It is critical that we have the opportunity to review the existing right of way agreements prior to the Council's adoption of the Small Cell Law to ensure that the Small Cell Law is consistent with existing right of way agreements for traditional utilities. We also believe it is incumbent on the Council to review and understand the right of way agreements prior to adopting the Small Cell Law. Based on the foregoing, we request that the City Council refrain from adopting the Small Cell Law until we have a reasonable time to review all existing right of way agreements described above.

"Telecommunications" is not limited to wireless carriers/service (see 47 U.S.C. §153(50)). Specifically, 47 U.S.C §253(a) prohibits State and local statutes/regulations that "may prohibit or have the effect of prohibiting the ability of an entity to provide any interstate or intrastate telecommunications service." The federal statute places a similar prohibition on a State and/or local government's regulation of the "placement, construction, and modification" of wireless telecommunications facilities, requiring that such regulations "shall not prohibit or have the effect of prohibiting the provision of personal wireless services." 47 U.S.C. §332(c)(7)(B)(i)(II). Accordingly, a different regulatory framework, including access regulations and fees, for similar telecommunications technologies works to "prohibit or have the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service" in violation of §253(a).

[2] "a regulation need not erect an absolute barrier to entry in order to be found prohibitive... It is enough that [the regulation] would 'materially inhibit' the provision of services." Quest Corp. v. the City of Santa Fe, 380 F. 3d 1258, 1267 (10th Cir. 2004), citing RT communications, Inc. v. FCC, 201 F.3d 1264, 1268-69 (10th Cir. 2000). In Quest Corp., the Court of Appeals found requirements placed on telecommunications providers by the city's ordinance with respect to both rent and construction costs to be "substantial," representing a "massive increase in cost," and thus were prohibitive under §253(a) of the telecommunications act and thereby unenforceable. Id. at 1271-75.

[3] "Nothing in this section affects the authority of a State or local government to manage the public rights-of-way or to require fair and reasonable compensation for telecommunications providers, on a competitively neutral and nondiscriminatory basis, for use of public rights-of-way on a nondiscriminatory basis, if the compensation required is publicly disclosed by such government." 47 U.S.C. §253(c). Notably, the courts and the FCC have interpreted this subsection to require regulations as to both the management of the rights-of-way and any required compensation to be "competitively neutral" and "non-discriminatory." Quest Corp., supra at 1271.

Proposed Fees Will Materially Inhibit the Provision of Future Wireless Service in the City of Beacon Which Will have an Adverse Impact on City Residents

Established decisional law in New York confirms that a property owner is not entitled to consent to or receive compensation for what is essentially a private pole attachment (i.e. attachment of equipment to a privately-owned utility pole). In the event that the City Council enacts the Small Cell Law with the current annual fees, such fees will likely materially inhibit the provision of future wireless service to the city of Beacon.

For example, the attempt to require a $1,000 annual fee payable to the city for collocations on privately-owned poles represents a significant barrier to market entry in the city of Beacon. This is especially so in light of the fact that the city has no interest in the utility owned pole upon which the equipment would be attached. This is essentially an unlawful "pay to play" scheme intended to benefit municipal coffers to the detriment of wireless service providers and ultimately city of Beacon residents.

Consider also that the proposed $1,000 annual fee (i.e. city pole attachment fee) is substantially greater than pole attachment rates approved by the New York Public Service Commission ("PSC") relative to wireless attachments to utility owned poles. See for example, the enclosed Order Approving Tariff Amendment (effective December 17, 2015) relative to approved rates for attachments to National Grid poles. The National Grid pole annual attachment rate for wireless attachments is $71.74, while the annual attachment rate for wireless attachments that require an existing pole to be extended is $146.86. There is absolutely no justification for the discrepancy between the $1,000 annual fee the city wants to charge and the PSC regulated pole attachment rates.

Moreover, this unjustified annual municipal fee will significantly increase budgets of wireless service providers in the city of Beacon which will act as barriers to market entry for Verizon Wireless and other providers. The absence of future wireless deployment in the city of Beacon will deprive the city and its residents of the substantial benefits associated with having ubiquitous and modern wireless service. For instance, advanced wireless services are beginning to be used to establish "smart cities." A smart city is an urban area that uses wireless service to manage assets and resources efficiently, including, but not limited to, traffic and transportation systems, power plants, water supply networks, waste management, law enforcement, schools, libraries and hospitals. If the city enacts the Small Cell Law with unreasonable annual fees, Verizon Wireless and other providers will likely develop future wireless networks in other municipalities that are more hospitable and not antagonistic to future wireless development.

As a further example of how the unsupported annual fees proposed in the Small Cell Law will act as a barrier, one needs to look no further than the eighteen states that have enacted laws regulating small cells in public rights of way. Those eighteen states (AZ, CO, DE, FL, IA, IL, IN, KS, MN, NC, NM, OH, OK, RI, TN, TX, UT, VA) have limited the annual right of way fees to the management costs generally ranging between $0 and $250. The proposed annual fees contained in the Small Cell Law, which range from $1,000 to $2,000 per year, are excessive and do not relate to management costs incurred by the city. Moreover, these are the areas (i.e. areas with fair and reasonable fees) where wireless providers, such as Verizon Wireless, will deploy the next generation wireless services, enabling economic growth opportunities with 5G, smart

cities and the Internet of Things (IoT). Municipalities such as Beacon will miss out on these significant opportunities due to the barriers created by the exorbitant annual fees and over regulation of small cell facilities.

Verizon Wireless Has a Right to Use and Occupy Public Rights of Way Under the NY Transportations Corporations Law

Under the New York State Constitution and relevant statutes, a municipality may exercise reasonable, not unlimited, authority over the use of its public rights-of-way, including use by utilities.[4] Use and occupancy of public rights-of-way by traditional land-line utilities is long-standing and uncontested, and those utilities are not generally required to obtain project-specific consents and permits for access to a municipality's public rights-of-way; instead, they are recognized as having a right to use and occupy under the New York Transportation Corporations Law ("TCL").[5] Additionally, the permits and fees typically required of traditional utilities are generally limited to those pertaining to performing construction and maintenance work within the public right-of-way, such as a highway work permit. Such a limited imposition of burdens is entirely consistent with the principle that, because, these entities serve the public and the public pays for such service, it is contrary to public policy to impose unnecessary additional costs on those entities and their customers. Moreover, the purpose of regulating wireless facilities should not be related to making a profit for the municipality.

Traditional utilities organized under the TCL possess use and occupancy rights as described above. Although Verizon Wireless has elected to not form as a TCL, for the reasons that follow it still enjoys those same rights. The TCL extends the powers and privileges of the TCL to entities that are not organized under the TCL, but are organized for the purposes specified in the TCL.[6] That is the case with respect to Verizon Wireless because it fulfills the same purposes as a traditional land-line telephone corporation organized under the TCL to provide telephone and other communications services to the public. Moreover, wireless telecommunications service providers have been recognized as public utilities by New York's highest court.[7]

Additionally, the explosive growth of wireless services demonstrates that the communications purposes identified in the TCL are being served to a greater extent by wireless providers than by traditional telephone corporations. It has been estimated that there are approximately 396 million wireless subscriber connections active in the United States as of 2016, an increase of more than 18 million connections over the prior year.[8] The number of American households that are wireless only (meaning no landline connections) has exceeded 50%, with

[4] N. Y. Const. Art, IX, §2(c)(6); General City Law §20.
[5] TCL §27 grants "telegraph and telephone corporations" organized under the TCL the right to "erect, construct and maintain the necessary fixtures for its lines upon, over and under any of the public roads, streets and highways..."
[6] "a corporation hereto for or hereafter incorporated under a general law for a purpose or purposes for which a corporation may be formed under this chapter shall in respect to such purpose or purposes have all the powers and privileges conferred, and be subject to all the duties, liabilities and limitations imposed, on a corporation organized for such purpose or purposes under this chapter." TCL §5.
[7] See, Cellular Tel. Co. v. Rosenberg, 82 N.Y. 2d 364, 371 (1993).
[8] See o on line data at https:www.ctia.org/industry-data/ctia-annual-wireless-industry-survey

that percentage exceeding two thirds for millennials.[9] In recognition of this trend, Federal officials are rapidly moving forward with plans to upgrade 911 systems to provide the capability to accept all manner of wireless data, including text messages, photos and video. [10] Already, nearly 70% of 911 calls today are made from mobile devices. [11] As a consequence, the now dominant role of wireless communications as an essential provider, not only of public service, but of emergency services well, is indisputable. As a matter of critical public policy, as well as correct interpretation of law, Verizon Wireless is entitled to be treated in the same fashion as a telephone corporation organized under the TCL.

Because the rights and obligations pertaining to utilities organized under the TCL also apply to those that are organized under different laws, but provide similar services to the public[12], where new poles are involved, the burden, including permitting and fees, imposed on the wireless provider can be no greater than that required for traditional electric and telephone companies. Wireless provider has the same rights and obligations as a traditional land-line telecommunications provider it cannot be required to go through more permitting or to pay greater costs than those that are legally imposed on the traditional telephone company.

Easement Apportionment Rights

In New York, utilities have a right to apportion existing easement rights to set and maintain poles and other equipment on the property to which they have been granted access, unless the grant specifically forbids such apportionment. The Court in Hoffman v. Capitol Cablevision Systems, Inc., 383 N.Y.S.2d 674, 678 (3d Dep't 1976), held that the pole attachment agreement granting the defendant cable company a license to install its equipment on existing utility-owned poles in the rights of way was a proper apportionment of the utilities' easements on the property, determining that the landowner's consent to the attachments was not required, nor was the land owner entitled to any compensation. Nothing granted to the cable company enabled it to do anything which the existing utility could not have done. Id. Notably, the Hoffman court did not distinguish between public and private ownership of the underlying land, nor would such a distinction have any bearing on the merit of the Court's holding.

For the reasons discussed above, the annual fee requirement contained in Section 223-26.4(F)(3(a)) violates the specific holding in Hoffman and, as such, this provision should be deleted from the Small Cell Law.

In furtherance of the above discussion, an electric utility may allow attachments on its poles by telephone companies, Cablevision providers and wireless providers unless specifically forbidden to do so by the original grant of authority to the electric utility to construct and maintain its poles. If the argument that wireless attachments cannot occupy portions of an electric utility's poles without further municipal authorization were valid, then that utility would also be precluded from permitting attachments by telephone corporations and cable television

[9] 2017 CTIA Wireless Snapshot, may 2017 & FCC, Annual Report and Analysis of Competitive Market Conditions with Respect to Mobile wireless, Nineteenth Report, DA 16-1061 (September 23, 2016)
[10] FCC Notice of Proposed Rulemaking dated September 22, 2011 (FCC 11-134)
[11] Wireless 911 Services-FCC Consumer Facts Sheet available online at http://www.fcc.gov/guides/wireless-911-services
[12] TCL §5; see footnote 3, supra

companies without similar governmental authorization. Acceptance of this premise would yield the irrational result that virtually all current attachments by other utilities to existing utility poles are unauthorized. While the existing utility may have a right to charge the entity making new attachments to a pole for the cost associated with use of a portion of the pole, there is no basis for the city to charge the new entity for that attachment. Such an additional fee would amount to charging a second time for a right to occupy already granted to the original utility.

Compliance with NYS "Broadband for All" Policy

In addition to being required by New York law, evenhanded treatment of wireless providers is critical to the State's aggressive policy, "Broadband for All," promoting broadband access, including wireless access throughout the state.[13] Imposing greater burdens on wireless providers than on traditional telecommunications providers is simply inconsistent with that policy.

Moreover, a municipality's regulation of small cell facilities that creates greater burdens on wireless providers may result in the practical effect of prohibiting small cell facilities from its borders, which will, in turn, deprive the residents of the municipality the benefit of having safe and adequate wireless service.

Conclusion

Based upon the foregoing, Verizon Wireless believes that certain changes are required to the Small Cell Law in order to make such law consistent with Federal and New York State law. Specifically, Verizon Wireless recommends the following.

1. The proposed annual fees are excessive and should be reduced and/or eliminated.

    a. Due to the minor nature of the proposed installations, the special use permit application fee should be reduced to $50 per application.
    b. The $1000 annual fee for co-location on a privately owned utility pole (with no equipment to be located on the ground in the right of way) should be eliminated. As set forth above, such fee is inconsistent with the holding in the Hoffman case.
    c. Based upon the eighteen (18) states that have enacted small cell laws to date, the proposed fees in the Small Cell Law are excessive and should be reduced. Specifically, we recommend that the annual fee for a new small cell facility in a right-of-way (i.e. a new utility pole/structure) owned by the city of Beacon should not exceed $250.

2. The prohibition of locating small cell facilities in the Historic District and Landmark Overlay Zone, as contained in section 223-26.4 (G) (1) (a), should be eliminated. As previously discussed in our May 23 letter, prohibiting small cell facilities from this zoning district, while allowing traditional utilities to install infrastructure in such area, serves to discriminate against wireless facilities. Federal law expressly prohibits local

[13] See https://www.ny.gov/programs/broadband-all

municipalities from treating wireless facilities in public rights-of-way differently than traditional utilities. Such disparate treatment violates the Telecommunications Act of 1996 requirement that municipalities regulate public rights-of-way in a competitively neutral and nondiscriminatory manner.

3. We believe that section 223-26.4 should be revised to require a special use permit only for new small cell facilities that propose to install a new utility pole/structure in the public right-of-way. All other proposals, including, but not limited to, co-location on an existing structure, replacement of an existing utility pole with a taller pole, not to exceed 50 feet in height, should be subject to issuance of a building permit only. First and foremost, as has been demonstrated previously, small cell facilities are unobtrusive by nature and similar to equipment utilized by traditional utilities in existing rights of way. It is our understanding that the city does not currently require special use permits for installation of traditional utility equipment on existing utility poles, nor does it require a special use permit for the replacement of a utility pole. For this reason, it would be inappropriate for the city of Beacon to impose different rules for wireless facilities then currently imposed for traditional utilities. Second, although we cannot predict the future, it is likely that local municipalities will see a fairly significant number of small cell facility applications in the future. If this happens, the proposed Small Cell Facility law may result in significant city resources being spent on the review of relatively innocuous applications, which will serve to deplete existing city resources for more pressing issues.

4. As set forth in our May 23 letter, we believe that the location priorities provided in section 223-26.4 (E) are unlawful. It is inappropriate for a municipality to force applicants onto municipally owned property and/or structures. For this reason, the priorities provided in the reference section should be eliminated.

Thank you for the opportunity to comment on the proposed local law. We are happy to answer any questions relative to this letter or any of our prior letters or comments.

Very truly yours,
YOUNG SOMMER, LLC

Scott Olson

Enclosure
EC: Nicholas M. Ward-Willis, Esq.
Mark Coon (Verizon Wireless)

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on December 17, 2015

COMMISSIONERS PRESENT:

Audrey Zibelman, Chair
Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman

CASE 15-E-0444 - Tariff filing by Niagara Mohawk Power Corporation d/b/a National Grid to update the rates in Rule No. 35 - Cable System Operator and Telecommunications Service Provider Wire Line Attachment Rates to Electric Distribution Poles contained in P.S.C. No. 220 - Electricity.

ORDER APPROVING TARIFF AMENDMENTS

(Issued and Effective December 17, 2015)

BY THE COMMISSION:

INTRODUCTION

On July 27, 2015 Niagara Mohawk Power Corporation d/b/a National Grid (NMPC or the Company) filed revisions to its electric tariff schedule, P.S.C. No. 220, to update Rule No. 35 - Cable System Operator and Telecommunication Service Provider Wire Line Attachment Rates to Electric Distribution Poles Including Wireless Attachment Rates (Rule 35). NMPC proposes 10.3% increases to its annual cable and telecommunications wire line pole attachment rate from $12.73 to $14.04; its annual electric distribution pole wireless attachment Rate A from $65.05 to $71.74; and its excess wireless pole attachment Rate B from $133.15 to $146.86. The proposed

changes also correct a typographical error in the title of Rule 35.1.

On July 30, 2015, NMPC made a supplemental filing to correct rates that were incorrectly filed in its July 27, 2015 submission. The amendments have an effective date of November 23, 2015. NMPC has requested a waiver of the requirements of newspaper publication pursuant to Public Service Law §66(12)(b) and 16 NYCRR §720-8.1 for these filings because the attachers will be notified.

BACKGROUND

In the Commission's Order issued July 16, 2002 (2002 Order),[1] all utilities were authorized to file new pole attachment rates, with updated costs, in line with the cable television attachment rates as calculated in the exhibit to the 2002 Order. The 2002 Order further stipulated that the cable rates would apply to both cable television attachments and competitive local exchange company attachments.

NMPC's current annual wire line rate of $12.73 and its annual wireless attachment rates of $65.05 (for attachment of wireless facilities to an existing distribution pole) and $133.15 (for attachment of wireless facilities to a distribution pole for which the wireless service provider requires excess pole height) were approved by the Commission in 2012 in Case 11-E-0708.[2] The Company's current attachment rates result in an annual under-recovery from third party pole attachers of

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[1] Cases 01-E-0026, et al., New York State Electric & Gas Corporation, et al. - Rates, Order Granting, In Part, Petitions for Rehearing and/or Clarification (issued July 16, 2002), p. 6.

[2] Case 11-E-0708, Niagara Mohawk Power Corporation d/b/a National Grid - Pole Attachment Rates, Untitled ARSO (issued March 15, 2012).

approximately $695,000 in pole ownership costs. The proposed rates are based on 2014 actual costs.

NOTICE OF PROPOSED RULE MAKING

Pursuant to the State Administrative Procedure Act (SAPA) §202(1), a Notice of Proposed Rulemaking was published in the State Register on August 19, 2015 [SAPA No. 15-E-0444SP1]. The time for submission of comments pursuant to the Notice expired on October 5, 2015. No comments were received.

DISCUSSION AND CONCLUSION

Niagara Mohawk Power Corporation computed the requested wire line pole attachment rate in accordance with the Federal Communications Commission (FCC) formula using FERC Form 1 Accounts for Cable Television Attachments which was previously accepted by the Commission in the 2002 Order. The Company calculated the requested wireless attachment rates consistent with the methodology approved in the Case 11-E-0708. Staff completed a review of the Company's calculations and also conducted an independent analysis to develop these rates.

For the wire line attachment rate, Staff found that Niagara Mohawk used an allocated depreciation reserve for account 364, Distribution Poles, rather than using the actual depreciation for that account. The Company's use of an allocated depreciation amount is consistent with the FCC formula which was accepted in Case 11-E-0708. The FCC formula uses the total accumulated distribution reserve. In order to verify that the FERC methodology produces reasonable rates, Staff calculated pole attachment fees using the Company's actual depreciation reserve for account 364. Staff's calculations resulted in higher wire line pole attachment rates similar to the rate differentials as calculated by Staff in Case 11-E-0708.

The Company's wireless attachment rates are based on the same costs used for the wire line attachment rate. Similar to the wire line attachment rate calculation, the Company uses the allocated depreciation amount rather than the actual depreciation amount for the wireless attachment rates. Consistent with the differences found with calculating the wire line pole attachments using this allocated depreciation methodology, Staff calculated a slightly higher rate using the actual depreciation amount, for the wireless attachment rates requested by the Company. Because Niagara Mohawk's filed rates are below the rates calculated by Staff, we consider them to be just and reasonable and so such rates are approved.

The Commission orders:

1. The tariff amendments listed in the Appendix shall become effective on December 21, 2015.

2. The requirements of Public Service Law §66(12)(b) and 16 NYCRR §720-8.1 as to newspaper publication of the proposed changes are waived.

3. This proceeding is closed.

By the Commission,

(SIGNED)

KATHLEEN H. BURGESS
Secretary

CASE 15-E-0444 APPENDIX

SUBJECT: Filing by NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID

Amendments to Schedule P.S.C. No. 220 - Electricity

Second Revised Leaves Nos. 195, 196

Issued: July 27, 2015 Effective: November 23, 2015
Postponed to December 21, 2015.

Third Revised Leaf No. 196

Issued: July 30, 2015 Effective: November 23, 2015
Postponed to December 21, 2015.

SAPA: 15-E-0444 - STATE REGISTER - August 19, 2015

NEWSPAPER PUBLICATION: Waived