

Community of License Change – Section 307(b)

Anastos Media Group, Inc. (“Anastos”), the licensee of WUAM(AM), Saratoga Springs, New York (Facility ID No. 72620) (the “Station”), submits this application for a construction permit for the minor modification of the Station to specify Watervliet, New York as the Station’s community of license in lieu of Saratoga Springs, New York (the “Application”).

This exhibit, together with the Technical Exhibit to this Application, demonstrates that the proposed community of license change constitutes a preferential arrangement of allotments or assignments under Section 307(b) of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. Section 307(b). Furthermore, as set forth in the Technical Exhibit, the facilities specified in the Application are mutually exclusive, as defined in Section 73.37 of the Commission’s Rules, with the Station’s currently licensed daytime facilities. The applicant will comply with the local public notice provisions of Sections 73.3580(c)(3), 73.3580(d)(3), and 73.3580(f) of the Commission’s Rules, and understands that the exception contained in Section 73.3580(e) of the Commission’s Rules does not apply to an application proposing to change the community of license of an AM station. Consequently, this proposed community of license change qualifies for submission as a minor modification application pursuant to Section 73.3571(j) of the Commission’s Rules.

In determining whether a proposed community of license change constitutes a preferential arrangement of allotments under Section 307(b) of the Act, the Commission considers whether the proposal would serve one or more of the Commission’s four priorities. <sup>1/</sup>

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<sup>1/</sup> See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982) (“*FM Assignment Policies*”). The four priorities are: (i) one full-time aural reception service to a community; (ii) a second

Here, grant of the Application would satisfy the third priority by authorizing a first local aural transmission service at Watervliet, New York. The Application constitutes a preferential arrangement of allotments under Section 307(b) as compared to the existing allotment/assignment because, if the Application is approved, Watervliet would receive its first local aural transmission service and Saratoga Springs would continue to have local aural transmission service from licensed stations WSPN(FM) and WSSK(FM). 2/

Watervliet, New York, clearly constitutes a community suitable for allotment purposes. Commission precedent holds that a community that is either incorporated or is a Census-Designated Place presumptively qualifies as a community for allotment purposes and thereby merits its own local transmission service. 3/ Watervliet meets this presumption: the city of Watervliet was incorporated in 1896. 4/ The City of Watervliet was listed as an incorporated place in the 2000 U.S. Census. 5/

Furthermore, Watervliet, which had a 2000 Census population of 10,207

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full-time aural reception service to a community; (iii) one local transmission service to a community; or (iv) other public interest factors. The second and third criteria have equal priority. *Id.* at 91. *See also Report and Order, In the Matter of Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services*, FCC 06-163 at ¶ 10 (released Nov. 29, 2006) (Section 307(b) priorities and policies used by Commission since 1982 continue to apply under new application procedures).

2/ According to the Commission's CDBS database, WSPN(FM) is currently operating; WSSK(FM) is presently silent.

3/ *See e.g., Cleveland and Ebenezer, Mississippi R&O*, 10 FCC Rcd 8807, 8808 [¶ 6] (Allocations Br. 1995) ("The Commission's long standing policy is to allot channels to communities composed of geographically identifiable population groupings. This requirement is generally satisfied if the community is either incorporated or listed in the U.S. Census."). *See also Reydon, Oklahoma R&O*, 18 FCC Rcd 3222, 3222 [¶ 2] (Ass't Chief, Audio Div., released Mar. 4, 2003).

4/ *See* website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1).

5/ *See* U.S. Census Bureau, Census 2000, at <http://censtats.census.gov/data/NY/1603678674.pdf> (copy at Attachment 2).

persons, 6/ has numerous indicators of community status including the existence of a local government as well as social, economic, commercial, cultural, public service, and religious organizations that serve the community. 7/

Watervliet calls itself “The Arsenal City,” as it is home to the U.S. Army’s Watervliet Arsenal, which was founded in 1813 and is the oldest federal arsenal in the country. 8/ In its “Welcome to the City of Watervliet” publication for new residents, the mayor describes Watervliet as a “full-service city” that is populated by “close-knit community of hard-working people.” 9/ Watervliet has its own zip code (12189) and post office. 10/ The city is governed by a mayor and two council persons, all of whom are elected by the city’s residents. 11/ The city also employs a city assessor, city clerk, city court judge, corporation counsel, and a city historian. 12/ Watervliet has a city hall building, its own police department, and its own fire department. 13/ The city also has its own public works department, which,

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6/ *Id.*

7/ *See Hayfield, Virginia*, 12 FCC Rcd 16373 (M.M. Bur 1997) and *Kenansville, Florida*, 5 FCC Rcd 2663 (M.M. Bur 1990), *aff’d.*, 10 FCC Rcd 9831(1995).

8/ *See* website of Watervliet Arsenal at <http://www.wva.army.mil/index.html>; “Watervliet Arsenal Museum”, at <http://www.wva.army.mil/MUSEUM.HTM>; “Watervliet, New York: Where Large Guns Are Made,” at [http://www.roadsideamerica.com/tips/getAttraction.php3?tip\\_AttractionNo==6242](http://www.roadsideamerica.com/tips/getAttraction.php3?tip_AttractionNo==6242). *See also* Rick Karlin, “New Deal for Arsenal,” *Albany Times Union*, September 5, 2006, at B6; Larry Rulison, “Sweeney Touts Incubator’s Strengths: Congressman Hopes to Secure More Funding For Watervliet Facility,” *Albany Times Union*, April 26, 2006, at E1; Jordan Carleo-Evangelist, “Arsenal Changes Leader, Mission,” *Albany Times Union*, July 26, 2005, at B1; (copies at Attachment 3). *See also* website of the City of Watervliet (copy at Attachment 1).

9/ *See* “Welcome to the City of Watervliet” publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4).

10/ *See* United States Postal Service website at <http://zip4.usps.com> (copy at Attachment 5).

11/ *See* website of the City of Watervliet (copy at Attachment 1).

12/ *Id.*; *see also* “Watervliet City Court” at <http://www.town-court.com/getTownCourt.php?courtID=79> (copy at Attachment 6).

13/ *Id.*

among other things, provides residents with water, sewer, and trash removal services, and its own housing authority, whose mission is to ensure that Watervliet offers safe and affordable housing to its residents. <sup>14/</sup> Watervliet also has its own regional library branch and its own school district. <sup>15/</sup> Watervliet has a number of municipal parks and the city's Recreation Working Supervisor oversees the city's recreation program, including the operation and maintenance of Watervliet's municipal swimming pool and the city's own recreational facility known as "The Dome." <sup>16/</sup> The city of Watervliet also sponsors many community activities throughout the year: a beautification contest, the Arsenal City Run road race, an Easter egg hunt, a Memorial Day parade, a Fourth of July celebration, and a Christmas tree lighting ceremony. <sup>17/</sup>

In addition to these government and municipal services, the existence of numerous other businesses and organizations in Watervliet demonstrate that the city is a community that deserves its own local transmission service. Watervliet has an abundance of local businesses that serve its residents' needs, including grocery stores, restaurants, banks, apartment complexes, funeral homes, and a bookstore. <sup>18/</sup> A number of the local businesses

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<sup>14/</sup> See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1); "Welcome to the City of Watervliet" publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4).

<sup>15/</sup> See website of Watervliet Public Library at <http://www.uhls.org/watervliet/> (copy at Attachment 7); website of Watervliet City Schools at <http://vliet.neric.org> (copy at Attachment 8).

<sup>16/</sup> See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1); "Welcome to the City of Watervliet" publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4).

<sup>17/</sup> See "Welcome to the City of Watervliet" publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4); see also Watervliet Beautification Contest Flyer at <http://www.watervliet.com/flyer.pdf> (copy at Attachment 9).

<sup>18/</sup> See listings in the Yellow Book at <http://www.yellowbook.com> (copies of a representative sampling of listings at Attachment 10).

include “Watervliet” in their names, such as Watervliet Pharmacy, Watervliet Pizzeria, Watervliet Market and News, and Watervliet Wines and Liquors. <sup>19/</sup> In addition, there are over a dozen places of worship in Watervliet, serving a variety of denominations. <sup>20/</sup> There are also a number of active civic groups in Watervliet. The Watervliet Civic Center, a private not-for-profit cooperation founded in 1946 by the Watervliet Rotary Club, provides recreation services and programs for city residents, including sports leagues and arts and crafts classes. <sup>21/</sup> The Elks Club also has a Watervliet chapter and conducts community-spirited events such as a fundraising dinner to benefit the Watervliet library. <sup>22/</sup> There is also a Watervliet Senior Citizens center, which is run as a nonprofit, charitable organization, and is dedicated to providing a supporting and enriching environment for the city’s senior citizens. <sup>23/</sup>

If the Application is granted, the Station will place a principal community signal over 50 percent or more of the Albany Urbanized Area; however, a majority of the Commission’s *Tuck* factors are met. In a *Tuck* analysis, the Commission considers three criteria: (1) the signal population coverage, (2) the size and proximity of the proposed community to the central city of the urbanized area, and (3) the interdependence of the proposed community to the urbanized area. <sup>24/</sup> The interdependence factor is the most important criterion considered in

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<sup>19/</sup> See Watervliet search results in the Yellow Book at <http://www.yellowbook.com> (copy of listings for selected categories at Attachment 11).

<sup>20/</sup> See “All Churches” search results in Yahoo! Local Yellow Pages at <http://yp.yahoo.com> (copy at Attachment 12).

<sup>21/</sup> See “Watervliet Civic Center” at <http://www.watervlietciviccenter.com/> (copy at Attachment 13).

<sup>22/</sup> See listing of “The Benevolent and Protective Order of Elks of the USA” chapters at <http://www.elks.org/lodges/home.cfm?lodge=1500>;  
<http://www.uhls.org/watervliet/Chicken%20Marsala%202007.htm> (copies at Attachment 14).

<sup>23/</sup> See website of Watervliet Senior Center at <http://watervlietseniors.com/> (copy at Attachment 15).

<sup>24/</sup> See, e.g. *Saluda and Irmo, South Carolina*, 19 FCC Rcd 1078, 1079 [¶ 3] (Ass’t Chief, Audio Div., released Mar. 4, 2003).

making an allotment decision involving the proposed reallocation of a station to an urbanized area. 25/ In *Tuck*, the Commission set forth eight factors in assessing the interdependence of a specified community. 26/ The Commission has considered a community as independent when a majority of these factors demonstrate that the community is distinct from the urbanized area. 27/

Regarding criterion one, signal population coverage, the Commission reviews “the degree to which the proposed station could provide service not only to the suburban community, but also to the adjacent metropolis.” 28/ Here, more than 50 percent of the Albany Urbanized Area would be served. Such service does not preclude favorable consideration as a first local service. 29/ As to the size and proximity of the proposed community to the central city of the urbanized area, the center of Watervliet is over seven miles from the center of Albany. 30/ Watervliet’s population of 10,207 persons is substantial. In any event, the

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25/ *Id.*

26/ The eight independence factors are: (1) the extent to which community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own weekly newspaper or other media that cover the community’s local needs and interests; (3) whether the community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facility and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools and libraries. *Tuck*, 3 FCC Rcd at 5378.

27/ *See Parker and St. Joe, Florida*, 11 FCC Rcd 1095 (MMB 1996).

28/ *See Bon Air, Chester, Mechanicsville, Ruckersville, Williamsburg and Fort Lee, Virginia*, 11 FCC Rcd 5758, 5759-60 [¶ 10] (Chief, Policy and Rules Division 1996).

29/ *See e.g., Ashland, Coaling, Cordova, Decatur, Dora, Hackleburg, Hobson City, Holly Pond, Killen, Midfield, Scottsboro, Sylacauga, and Tuscaloosa, North Carolina, Atlanta, Georgia, and Pulaski, Tennessee*, 19 FCC Rcd 6943, 6945 [¶ 6] (MB 2004) (“*Ashland et al.*”); *Cameron, First Mesa, Flagstaff, Dewey-Humboldt, Parker, Bagdad, Globe, Safford, Grand Canyon Village, Gilbert, and Chino Valley, Arizona*, 19 FCC Rcd 6846, 6849 [¶ 7] (MB 2004).

30/ MapQuest calculates the driving distance between Watervliet and Albany as 7.14 miles. *See* <http://www.mapquest.com/> (copy at Attachment 16). *See also Saluda and Irmo, South Carolina* at 1079

Commission has stated that the first two criteria have less significance than evidence of independence. 31/

Turning to the first of the eight independence factors, there are no precise statistics as to the extent of the number of Watervliet residents who work in Watervliet; however, as previous noted, there are a multitude of businesses in Watervliet that provide ample employment opportunities for the residents of Watervliet, including the U.S. Army's Watervliet Arsenal, which is the country's sole manufacturing facility for large caliber cannons. 32/

As to independence factor two – whether the smaller community has its own weekly newspaper or other media that cover the community's local needs and interests – Watervliet has its own cable station, WLVT-17, that informs town residents of community related issues, including broadcasts of public service announcements, community events like Little League games and city parades, and provides a community calendar “bulletin board” to keep residents informed of upcoming events in Watervliet. 33/ In addition, the city's official website provides information about Watervliet for residents and visitors and includes news about the city and an events calendar. 34/ Also, several of Watervliet's municipal services publish their own newsletters, including, for example, the Watervliet Housing Authority, the Watervliet

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[¶ 3] (independent community is located about 10 miles from central community); *Ashland et al.* at 6945 [¶ 7] (Midfield is an incorporated community located nine miles from Birmingham with an elected mayor and city council).

31/ See e.g., *Ashland et al.* at 6945 [¶ 6].

32/ See Note 8.

33/ See “Watervliet is Star on City Cable TV Station: Programs about Residents and Community Events Build a Strong Following,” *Albany Times Union*, August 17, 2006, B3 (copy at Attachment 17).

34/ See website of the City of Watervliet (copy at Attachment 1).

Senior Center, and the Watervliet Junior/Senior High School. 35/

Factor three – whether the community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area – is clearly demonstrated by the decision of Watervliet’s community leaders and residents to incorporate the city over a century ago. 36/ As noted above, the mayor of Watervliet describes Watervliet as a “full service city” and a “close-knit community of hard-working people.” 37/ Also, the city has its own seal. 38/ Furthermore, the pride that residents have in the community’s history demonstrates that Watervliet’s residents perceive that their city is an independent place. The city employs an official city historian who is responsible for “preserving, collecting, and disseminating local historical knowledge.” 39/ The historian’s duties include managing historical documents and materials, responding to requests for historical information, and calling to the attention of local authorities any materials or issues of local historical value. 40/ Additional evidence of the residents’ pride in Watervliet’s history includes a virtual photo exhibit on the city’s website with historical photographs, maps, and other archival documents about Watervliet, and the fact that the Friends of the Watervliet Library sell an annual calendar

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35/ See, e.g., January 2007 newsletter of the Watervliet Housing Authority, at <http://www.watervliethousing.org/NewslettersPDF/Jan%202007%20NL.pdf>; December 2006 newsletter of the Watervliet Junior/Senior High School, at <http://vliet.neric.org/newsletter.pdf> (copies at Attachment 18).

36/ See *Maryland; Belle Haven, Cape Charles, Exmore, Nassawadox, and Poquoson, Virginia*, 18 FCC Rcd. 19561, 19566-67 [¶ 13] (MB rel. Sept. 29, 2003) (“Poquoson’s leaders and residents view it as a separate, independent community, as evidenced by Poquoson’s decision in 1952 to leave York County and to become a City in 1975”).

37/ See “Welcome to the City of Watervliet” publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4).

38/ See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1).

39/ *Id.*

40/ *Id.*



with images from the community's past. 41/

Watervliet also clearly qualifies under factor four – whether the specified community has its own local government and elected officials. As previously stated, Watervliet has been incorporated for over a century and is recognized as an incorporated city by the U.S. Census Bureau. 42/ Watervliet has its own city hall, mayor, and council persons. 43/ The mayor, who is elected every four years, is the chief executive officer of the City of Watervliet and presides over the Watervliet City Council. The Watervliet City Council is comprised of the mayor and two council persons elected-at-large for overlapping four year terms. The Watervliet City Council is the legislative, appropriating, governing, and policy-determining body of the Watervliet city government and is responsible for approving all budgets and setting policies for all city departments. 44/ In addition, the Watervliet Housing Authority has its own officials. The governing body of the Watervliet Housing Authority is comprised of five commissioners appointed by the City Council and two tenant-elected representatives. 45/

As to the fifth factor – whether the smaller community has its own telephone book provided by the local telephone company or its own zip code – Watervliet has its own zip

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41/ See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1); website of Watervliet Public Library at <http://www.uhls.org/watervliet/> (copy at Attachment 7); Sharon Gazin, “Discovering Watervliet History on our Special Guided Tour,” *Albany Times Union*, July 8, 1988, T14 (copy at Attachment 19).

42/ See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1). See also U.S. Census Bureau, Census 2000, at <http://censtats.census.gov/data/NY/1603678674.pdf> (copy at Attachment 2).

43/ See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1).

44/ *Id.*

45/ *Id.*; see also website of the Watervliet Housing Authority at <http://www.watervliethousing.org> (copy at Attachment 18).

code (12189). 46/ Watervliet also has its own post office. 47/

Watervliet also meets the sixth indicator of independence – whether the community has its own commercial establishments, health facility, and transportation systems. As previously described, Watervliet has a number of businesses and establishments, including both national chains (Family Dollar, Rent-A-Center, Subway Sandwiches, etc.) as well as locally-owned establishments (Canine Clippers & Boutique, Canalside Gifts & Sports, Maggie’s Gift Shop, etc.). 48/ In addition to a number of medical doctors who have practices in Watervliet, there are also specialty health care facilities in the city, including The Hernia Institute and a Laser Oncology and General Surgery center. 49/

Regarding factor seven – the extent to which the specified community and the central city are part of the same advertising market – Watervliet is part of the Albany-Schenectady-Troy, New York Arbitron market as is the Station’s current community of license, Saratoga Springs. As was the case in the Norfolk Arbitron market in *Crisfield, Maryland et. al*, there are several municipalities within the Albany-Schenectady-Troy Arbitron market. 50/ However, advertisers can directly target Watervliet’s residents by advertising on Watervliet’s own community cable station, WLVT-17, which is operated by the Watervliet Housing Authority and accessible via the Time Warner Cable system. 51/

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46/ See United States Postal Service website at <http://zip4.usps.com> (copy at Attachment 5).

47/ *Id.*

48/ See listings in the Yellow Book at <http://www.yellowbook.com> (copies of a representative sampling of listings at Attachment 10).

49/ *Id.*

50/ *Crisfield, Maryland; Belle Haven, Cape Charles, Exmore, Nassawadox, and Poquoson, Virginia*, 18 FCC Rcd. 19561, 19567 [¶ 16].

51/ See “Welcome to the City of Watervliet” publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4);

Lastly, Watervliet also demonstrates its independence under factor eight – the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. As noted above, Watervliet has its own police department and fire department. There is a Watervliet Commissioner of Public Safety, in addition to a Watervliet Commissioner of Police and a Watervliet Fire Chief. 52/ Watervliet’s first fire company was organized in 1828 — today, the city’s fire department employs twenty-five professional firefighters. In addition to firefighting, the City of Watervliet Fire Department also provides emergency medical services, hazardous material spill mitigation, and accident rescue services. 53/ Also, as noted above, Watervliet has its own school system. The Watervliet School District serves 1,200 children. 54/ Watervliet students attend the Watervliet City School District, which consists of Watervliet Elementary School (grades K-12) and then Watervliet Junior/Senior High School (grades 7-12). 55/ Watervliet also has its own library, the Watervliet Public Library, which is party of the Upper Hudson Library system. The Watervliet Public Library offers a collection of over 14,500 books, has computers for public access, and provides community activities including a “Pajama Storytime” for children, books sales, and book discussion groups. 56/ Furthermore, Watervliet

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“Watervliet is Star on City Cable TV Station: Programs about Residents and Community Events Build a Strong Following,” *Albany Times Union*, August 17, 2006, B3; Terry Brown, “Watervliet Spotlights the Military,” *Albany Times Union*, December 24, 2005, B1 (copies at Attachment 17).

52/ See website of the City of Watervliet at <http://www.watervliet.com/> (copy at Attachment 1).

53/ *Id.*

54/ See “Welcome to the City of Watervliet” publication at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4); website of Watervliet City Schools at <http://vliet.neric.org> (copy at Attachment 8).

55/ *Id.*

56/ See website of Watervliet Public Library at <http://www.uhls.org/watervliet/> (copy at Attachment 7).

provides a host of other municipal services, including sewer, water, and trash removal services. 57/ The Watervliet Parks and Recreation Department oversees Watervliet's bicycle trails, parks, playgrounds, and municipal swimming pool. 58/ So that Watervliet residents can take full advantage of the benefits of living in the city, Watervliet enforces a residents-only policy on many of its recreational programs — at the Watervliet Civic Center and the Dome all patrons are required to produce proof of Watervliet residency. 59/ Also, as described above, Watervliet provides municipal services tailored for seniors citizens and low-income residents. The Watervliet Senior Center offers adult education classes, nutritional meals, and field trip opportunities to Watervliet's senior citizens. 60/ The Watervliet Housing Authority, which was created in 1959, provides homes for low-income Watervliet families via, among other things, its management of 406 apartments in Watervliet. The Watervliet Housing Authority has also expanded its scope of tenant services beyond housing to include job skills training, in-home education programs, and youth programs. 61/

In sum, analysis under the *Tuck* criteria confirms the independence of Watervliet. The Application will not deprive any current community of license of its sole local transmission service: Saratoga Springs, the current community to which WUAM(AM) is assigned, will continue to have local aural transmission service from WSPN(FM) and WSSK(FM) (currently silent). Moreover, Saratoga Springs will continue to receive multiple aural transmission

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57/ See website of the City of Watervliet (copy at Attachment 1).

58/ *Id.*

59/ See "Welcome to the City of Watervliet" publication at page 7, at <http://www.watervliethousing.org/NewslettersPDF/City%20Brochure.pdf> (copy at Attachment 4).

60/ See website of Watervliet Senior Center at <http://watervlietseniors.com/> (copy at Attachment 15).

61/ See website of the Watervliet Housing Authority at <http://www.watervliethousing.org> (copy at Attachment 18).

services.

Under Commission precedent, these indicia of community confirm that Watervliet is a place deserving of its own aural transmission service and that grant of the Application would further the public interest in the fair, efficient, and equitable distribution of radio services.

## **Attachment 1**

## Attachment 2

## **Attachment 3**



## **Attachment 4**

## **Attachment 5**

## Attachment 6

## **Attachment 7**

## Attachment 8

## Attachment 9

## **Attachment 10**

## **Attachment 11**



## **Attachment 12**

## **Attachment 13**

## **Attachment 14**

## Attachment 15

## **Attachment 16**

## **Attachment 17**

## **Attachment 18**

## **Attachment 19**