

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

In the Matter of)	
)	
)	
EXPANDED CARGO AND PASSENGER)	Docket DOT-OST-2010-0200
TRANSFER FLEXIBILITY AND EXPANDED)	Docket DOT-OST-1996-1600
AIR SERVICES AT INTERNATIONAL)	Docket DOT-OST-1999-5035
AIRPORTS IN ALASKA)	
)	

**APPLICATION OF THE STATE OF ALASKA TO RENEW AND AMEND
EXEMPTION FOR EXPANDED TRANSFER AUTHORITY AND EXPANDED
AIR SERVICES AT THE ALASKA INTERNATIONAL AIRPORTS**

Communications with respect to this document should be addressed to:

James Szczesniak, Airport Manager
Trudy Wassel, Deputy Airport Manager
Ted Stevens Anchorage Int'l Airport
Anchorage, Alaska 99501

John Binder
Deputy Commissioner
Alaska Department of
Transportation & Public Facilities
PO Box 112500
Juneau, AK 99811-2500

Jeff Stark
Chief Assistant Attorney General
Daryl Zakov
Assistant Attorney General
Transportation and Public Facilities Sector -
Airports
State of Alaska, Department of Law
Transportation Section—Airports
1031 W. 4th Avenue, #200
Anchorage, Alaska 99501

Robert E. Cohn
Patrick R. Rizzi
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, DC 20004
+1 202 637 4999/5659
robert.cohn@hoganlovells.com
patrick.rizzi@hoganlovells.com

Counsel for
State of Alaska
Department of Law

August 17, 2020

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

In the Matter of

EXPANDED CARGO AND PASSENGER)
TRANSFER FLEXIBILITY AND EXPANDED) Docket DOT-OST-2010-0200
AIR SERVICES AT INTERNATIONAL) Docket DOT-OST-1996-1600
AIRPORTS IN ALASKA) Docket DOT-OST-1999-5035

) August 17, 2020

**APPLICATION OF THE STATE OF ALASKA TO RENEW AND AMEND
EXEMPTION FOR EXPANDED TRANSFER AUTHORITY AND EXPANDED
AIR SERVICES AT THE ALASKA INTERNATIONAL AIRPORTS**

Pursuant to 49 U.S.C. § 40109(c) and Subpart C of the Department's Rules of Practice, the State of Alaska ("Alaska") hereby requests that the Department of Transportation:

- renew¹ the blanket exemption authority from 49 U.S.C. § 41301, described below, granted to all foreign carriers authorized to serve the United States for a period of not less than two years so that they may continue to engage in expanded cargo transfer activities and expanded air service at the Alaska International Airports²;
- reaffirm in any renewed authority that, absent extraordinary circumstances, the Department would anticipate routine multi-

¹ The existing exemption expires on September 20, 2020. However, in filing this Application for renewal, Alaska invokes and relies upon the automatic extension provisions of the Administrative Procedure Act, 5 U.S.C. § 558(c), as implemented by Part 377 of the Department's Special Regulations, to continue the authority in effect pending the Department's final determination on this renewal request. This renewal application, which involves exemption authority conferred upon foreign air carriers, is timely pursuant to § 377.10(c)(3). See also Notice of Action Taken, dated Oct. 25, 2006, at n.1 (Docket DOT-OST-1996-1600) (noting that authority had remained in effect under 5 U.S.C. § 558(c) and Part 377 pending final determination on the application for renewal).

² The "Alaska International Airports" are Ted Stevens Anchorage International Airport and Fairbanks International Airport.

year extensions of the authority in the future as it has repeatedly extended in the past; and

- amend the blanket exemption authority to encompass passenger transfer activities as was recently granted to the Commonwealth of Puerto Rico.

This exemption authority is, and has been, critically important in enabling the Alaska International Airports to remain competitive with foreign airports as international cargo transfer/transit hubs and as meaningful waypoints for international air services, thereby supporting the Alaskan economy and jobs. This competitiveness has enabled the Alaska International Airports in the past few years to help power the Alaskan economy as it continues to recover from a recession. This exemption authority is also very important as we prepare for COVID-19 recovery.

I. THE AUTHORITY REQUESTED.

The authority for which renewal is being sought has four fundamental parts.

First, in order to maintain and enhance the competitive position and profile of the State of Alaska and the Alaska International Airports as highly desirable and advantageous points for the transit, transfer, and trans-shipment of international air cargo and passenger traffic, Alaska requests that the following specific blanket exemption authority be renewed (for cargo) and amended with the red, italicized words (to encompass

passengers) for foreign air carriers that currently hold or subsequently receive effective Department authority to engage in foreign air transportation of cargo and passengers so that they may engage in the following cargo and passenger transfer activities at the Alaska International Airports:

1. To transfer cargo *and passengers* from any of their aircraft to any of their other aircraft (*i.e.*, on-line cargo transfers), provided that both aircraft are operating to/from a point in the carrier's homeland;
2. To make changes, at points in Alaska, in the type or number of aircraft used to transport cargo *and passengers*, provided that in the outbound direction the transportation beyond Alaska is a continuation of the transportation from the carrier's homeland to Alaska, and in the inbound direction, the transportation to the carrier's homeland is a continuation of the transportation from behind Alaska (*i.e.*, all forms of change of gauge for cargo and passenger operations, including "starburst" change of gauge);
3. To commingle cargo *and passengers* moving in foreign air transportation with cargo *and passenger* traffic not moving in foreign air transportation;
4. To discharge cargo *and passenger traffic* in Alaska for transfer to a U.S. carrier for onward carriage to a final destination in the United States or in a third country, and to uplift from Alaska cargo *and passenger traffic* transferred from a U.S. carrier which was transported by that carrier to Alaska from a point of origin elsewhere in the United States or in a third country (*i.e.*, interline cargo transfers to/from U.S. carriers); and
5. To discharge *passengers and* cargo in Alaska for transfer to another foreign carrier for onward carriage to a final destination in a third country, and to uplift from Alaska *passengers and* cargo transferred from another foreign carrier which was transported by that carrier to Alaska from a point of origin in a

third country (*i.e.*, interline transfers of cargo moving in foreign air transportation to/from other foreign carriers).

Renewal. Alaska seeks renewal of the above-quoted authority related to cargo. It is the same authority that the Department first granted to foreign air carriers in late 1996 and has subsequently amended/renewed several times, with the most recent re-issuance in September 2018. See, *e.g.*, DOT Order 1996-11-2; Notices of Action Taken in Docket DOT-OST-1996-1600, dated November 3, 1997, November 3, 1998, November 29, 2000, December 2, 2002, and October 25, 2006; DOT Order 2007-4-10; Notices of Action Taken in Dockets DOT-OST-2010-0200, 1999-5035, 1996-1600, dated August 19, 2010, August 16, 2012, August 12, 2014, August 18, 2016, and September 20, 2018 (the most recent grant, “September 2018 NOAT”).

Amendment. Alaska also seeks amendment of the above-referenced exemption authority to encompass the same transfer activities for passengers by inserting the italicized language in red above. This amendment would be consistent with the scope of passenger transfer activities granted to the Commonwealth of Puerto Rico earlier this year. See DOT Order 2020-4-10.

Tourism contributes over \$2.2 Billion to the Alaskan economy and is the 2nd largest private sector employer. These passenger transfer activities are mission critical to growing this industry in the State of Alaska.

Second, in order to enhance the competitive position and profile of the State of Alaska and the Alaska International Airports as highly desirable and advantageous waypoint stops or final destinations for air service, Alaska requests that the Department renew the exemption authority for all foreign air carriers that currently hold or subsequently receive effective Department authority to serve points in the United States to allow them also to serve any point or points in Alaska and to co-terminalize points in Alaska with other U.S. points for which they hold Department authority. This part of the requested authority is the same authority that the Department first granted to foreign air carriers in 1999 and most recently re-issued in September 2018. See DOT Order 1999-5-9; September 2018 NOAT.

Third, Alaska requests that this exemption authority be renewed for a period of not less than two years, and that the Department reaffirm its express unequivocal declaration that, absent extraordinary circumstances, it would anticipate routine multi-year extensions of this authority in the future.

Finally, we [DOT] again note that, since Alaska first requested authority for expanded air cargo transfer flexibility at Alaskan international airports in 1996, Alaska has consistently established the public interest bases necessary for the Department to reach favorable disposition of its requests. Barring an unforeseeable change in circumstances, we [DOT]

again see no reason why we would not continue to be favorably disposed towards renewal of this authority in the future.

September 2018 NOAT, at 2 (footnote omitted).

Fourth, Alaska requests that the Department once again – as it did in DOT Order 1999-5-9 and, most recently, in the September 2018 NOAT – reiterate its ongoing invitation to foreign air carriers to apply for authority to serve new U.S. points on an extra-bilateral basis, so long as such flights also serve Alaska: “we [DOT] again invite foreign air carriers to apply for authority to serve additional U.S. points on an extrabilateral basis, where those additional U.S. points would be served only on flights also serving Alaska.” September 2018 NOAT, at 2.

Importantly, the Application is not seeking authority for cabotage operations, which the law and the Department in its previous exemptions do not permit. Indeed, the Application seeks nothing more than exemption authority related to cargo that has previously been granted and renewed several times and an amendment by the addition of a few words to encompass passengers which is fully consistent with the Department’s recent *Puerto Rico* precedent.

II. RENEWAL AND AMENDMENT OF THE REQUESTED BLANKET EXEMPTION ARE CONSISTENT WITH DOT PRECEDENT AND IN THE PUBLIC INTEREST.

Under 49 U.S.C. § 40109(c), the Department may grant exemptions if they are “consistent with the public interest.” As the Department previously

recognized in granting and renewing this authority in the past with respect to cargo and as detailed further below, renewal and amendment of the blanket exemption is clearly in the public interest. It will continue to enhance the State of Alaska's ability to attract foreign carriers to use the Alaska International Airports as transit, transfer, and trans-shipment hubs for international air cargo and passenger traffic, thereby benefiting the State, its airports, its residents, and its businesses. It would also help create important new economic opportunities for U.S. carriers. Both of these significant benefits will provide the State of Alaska with economic growth, which is particularly important as the State continues to grapple with an ongoing State-wide recession and the fallout from the coronavirus pandemic. Accordingly, Alaska urges the Department to renew and amend this authority as described herein without delay.

A. Department Precedent Supports Renewing the Blanket Exemption Authority.

There is substantial, on-point Department precedent for renewing the authority requested in this Application.

In 1996 and 1999, the State of Alaska and the Alaska International Airports requested the same blanket exemption authority for cargo transfer activities that they seek here. After due consideration, the Department granted the blanket exemption authority for cargo transfers on an industry-wide basis, concluding that it was in the public interest. Thus, in granting

the exemption permitting expanded opportunities for cargo transfers in 1996, the Department wrote:

[Grant of this authority] would provide important public benefits to the State of Alaska. We noted that the Department, and the Civil Aeronautics Board before it, have long recognized the critical importance of air services to the economy of Alaska, and have acted to support Alaska's efforts to attract air services to the state. . . . We stated our view that the authority we proposed to grant would enable carriers to utilize fully the geographic advantages of Alaska as a cargo hub, would facilitate greater development of international operations at Alaskan airports, and would create new business opportunities for U.S. carriers.

DOT Order 1996-11-2, at 2.

Similarly, in granting exemption authority facilitating expanded air services to Alaska by foreign air carriers in 1999, the Department wrote:

We remain of the view that these regulatory measures will facilitate the operation of new international services to Alaskan points, thereby helping to offset the service reductions experienced by Alaska airports, and providing the potential for significant benefits to Alaska and its economy.

DOT Order 1999-5-9, at 4.³ Most recently, less than two years ago, the Department stated that "[o]ur previous public interest findings in the referenced Dockets remain valid and support renewal of these authorities." September 2018 NOAT, at 2.

³ The State of Alaska further notes that the Department has also similarly granted certain blanket authority to foreign air carriers (a) to provide expanded passenger and cargo services at Guam's Antonio B. Won Pat International Airport, (b) to provide expanded cargo services and transfer activities at the airports of the Commonwealth of the Northern Mariana Islands, and (c) to engage in expanded cargo services and transfer activities at Honolulu International Airport and Kona International Airport in Hawaii. See, e.g., DOT Order 2006-12-21 (Guam); DOT Order 2007-4-9 (Northern Mariana Islands); DOT Order 1999-12-10 (Honolulu, Kona).

This compelling public interest rationale underlying the previous grants of the exemption authority has lost none of its force, and thus the Department has a solid legal and policy basis – as well as years of Department precedent – upon which to renew this exemption authority expeditiously.

B. Recent Department Precedent Supports Amending the Blanket Exemption Authority to Include Passenger Transfers.

There is also recent Department precedent for amending the blanket exemption authority to expressly encompass passenger transfer activities at the Alaska International Airports. In April 2020, the Department granted broad exemption authority for foreign air carriers to engage in expanded cargo and passenger transfer activities at the international airports in Puerto Rico. See DOT Order 2020-4-10. The Department concluded that air service was vitally important to Puerto Rico, that Puerto Rico was heavily dependent on air transportation as a vital element of its economy, and that a strong public interest basis existed for granting the requested exemption authority covering cargo and passenger activities.

As discussed below, due to Alaska's unique, remote geographic location, cargo and passenger transfer authority is even more important to Alaska and its economy.

C. Renewal and Amendment of the Exemption is in the Public Interest.

The blanket exemption authority will continue to provide substantial public interest benefits for the State of Alaska, the Alaska International Airports, and the businesses and residents of the State, as the Department previously recognized in granting this blanket exemption authority for foreign air carriers. See September 2018 NOAT; DOT Order 1996-9-19, at 4 (Show Cause Order); DOT Order 1996-11-2, at 2 (Final Order); DOT Order 1999-5-9, at 4-5. This will, in turn, help Alaska's economy as it tries to build strength in the face of the State's ongoing recession and the global pandemic.

Given its importance, the need to encourage and support air transportation in Alaska has long been recognized. For example, the U.S. Congress has codified special cargo transfer rights at Alaska for eligible cargo in 49 U.S.C. § 41703(e). The corresponding section of the Conference Report accompanying the legislation acknowledged that "Alaska's geographic location and distance from the contiguous 48 States creates special needs, challenges and opportunities. Alaska has a unique geographic location as a technical and refueling stop for all cargo services between Asia, on the one hand, and Europe and North America on the other." H.R. Rep. No. 108-334, at 140 (2003). Alaska is located half-way between Asian countries and the continental United States, and it is only 9½ hours (flight time) from 90% of

the industrialized world. Accordingly, “[t]he Department, and Civil Aeronautics Board before it, have long recognized the critical importance of air services to the economy of Alaska, and have acted to support Alaska’s efforts to attract air services to the State.” DOT Order 1996-9-19, at 4.

Alaska is the largest State in terms of land mass. It has vast expanses of untamed, rugged wilderness and a very limited ground transportation network. Air transportation and the State’s airports are vital links for most Alaskans and, for many remote Alaskan communities, the only link to the outside world. As the late Senator Ted Stevens emphasized: “The Federal Government’s vast ownership of lands in Alaska and the limited access to those lands means that air transportation is the *only way* to reach most rural communities in Alaska.”⁴ Indeed, the aviation industry contributes \$3.8 billion annually to the State’s economy and provides 35,000 jobs statewide. *See Alaska Airports and Aviation – 2019 Annual Report*, at 1.⁵ The Alaska International Airports generate more than 26,000 jobs, and, in fact, 1 in 10 jobs in Anchorage are tied to Ted Stevens Anchorage International Airport (ANC). *See id.* Simply put, it is hard to overstate the importance of aviation to Alaska, its residents, and its businesses: “The contributions of aviation are vital in a state [Alaska] where 82% of the communities are accessible only by air. From floatplane docks, to the smallest rural airport, to the

⁴ 148 Cong. Rec. S7277 (July 24, 2002) (emphasis added) (statement of Senator Stevens in support of the Rural Services Improvement Act).

⁵ Available at <http://dot.alaska.gov/documents/aviation/2019-Annual-Report.pdf>

largest international airport, each airport contributes to the quality of life enjoyed by Alaska's businesses, residents, and visitor." *See id.*

Aviation is as critical to Alaska's economy and its residents as ever, but the challenges facing Alaska in attracting and maintaining air transportation remain today. With the ongoing global economic uncertainty, global pandemic, trade and tariff disputes, Alaska's ongoing recession, the increase in ultra-long-range aircraft that can overfly locations like Alaska, and the increased access to overflight routes and cargo/passenger transfer activities at airports in other countries, the Alaska International Airports face numerous competitive and economic challenges to maintaining and developing their attractiveness as air cargo and passenger waypoints and transfer hubs for foreign air carriers. Therefore, it is all the more important for the State of Alaska to retain and amend this exemption authority to remain competitive and to avoid adding friction to the State's aviation economy, the global air cargo and passenger economy, and the place of the Alaska International Airports in that global economy.

Indeed, after receiving the exemption authority at issue in mid-2010 mid-2012, and mid-2014, the State of Alaska moved quickly to alert foreign carriers and shippers regarding the air cargo and related transfer benefits available to them in Alaska. Among other things, the State of Alaska held "Air Cargo Summits" in 2010, 2011, 2013, and 2015 to publicize and

elaborate on the benefits of the Department's exemption authority and answer any questions related thereto. These summits were well attended by foreign air cargo carriers, and several carriers at that time and more recently have indicated that the availability of this exemption authority would be (or had been) very important to them in deciding whether to transit the Alaska International Airports in the first place or, if already operating there, in expanding their respective services.⁶

The Alaska International Airports have also distributed substantial information about the scope of this authority to foreign air carriers, and routinely receive responsive inquiries and requests for clarification. And, representatives of the State of Alaska have visited several Asian countries to promote the availability of these air cargo opportunities in Alaska.

These substantial efforts continue to reap benefits. In 2019, ANC welcomed more than 41,500 cargo aircraft landings and 5.7 million passengers flew in and out of ANC.⁷ Furthermore, the State of Alaska understands that as a result of its promotional efforts, certain airlines are using, and have in the past used, the expanded cargo transfer rights

⁶ With the exception of the 2015 Air Cargo Summit, which was held in Shanghai, China, the Department generously sent knowledgeable representatives from its Office of International Aviation to Alaska's previous Air Cargo Summits. Given their detailed understanding of the opportunities available under the exemption authority for which renewal is sought herein, the participation of these experts represented an immense contribution to the proceedings and ensured that the participating foreign carriers received the most accurate account of the opportunities available to them under the exemption authority. The State of Alaska wishes to express its gratitude to the Department for its willingness to participate and thereby to maximize the value of the Summits to the foreign carrier representatives present.

⁷ See Alaska International Airport System Statistics (cargo landing data); 2019 Annual Report, at 3 (passenger data).

available under the exemption. Alaska has also received interest from other foreign carriers about operating under the exemption authority. The State of Alaska needs this exemption authority renewed in order to continue this momentum.

The renewal and amendment of this authority for not less than (and preferably more than) two years will enable Alaska (i) to maintain and expand its profile as a welcoming, advantageously-located point for the transfer, trans-shipment, and transit of international cargo and passengers between different continents, and (ii) to continue providing opportunities for foreign air carriers to develop and use air cargo and passenger transfer facilities at the Alaska International Airports. It will also enhance the ability of Alaska and the Alaska International Airports to compete more effectively with foreign airports in the Russian Federation, Asia, the Middle East, and Canada, among others, as a hub for international air cargo and passenger transportation between different continents and via the polar routes. It will provide foreign air carriers with opportunities (beyond September 2020) available in Alaska that offer a uniquely economical and efficient fuel-payload trade-off. It will improve the economics and efficiencies associated with air trade and travel between the United States and foreign partners, thereby inuring to the broader benefit of the United States as a whole.

Likewise, with respect to the authority for foreign air carriers that hold effective DOT authority to serve any point or points in Alaska (passenger or all-cargo), and to co-terminalize points in Alaska with other U.S. points for which they hold Department authority, renewal of the exemption will keep alive these opportunities for foreign air carriers to expand service to the United States while realizing Alaska's goal of enhancing air service at the Alaska International Airports. The State of Alaska has recently promoted and explored innovative proposals with foreign air carriers to harness this aspect of the exemption authority, which has remained largely untapped. Additional time is needed to invite carriers to evaluate and introduce, even on a trial basis, new and unexplored services to and via Alaska. For similar reasons, reiteration of the Department's invitation for foreign air carriers to apply for authority to serve additional U.S. points on an extrabilateral basis, where those additional U.S. points would be served only on flights also serving Alaska, is warranted.

These efforts will continue to yield substantial public interest benefits for Alaska, the State's economy, its airports, and its residents, as has been the case in the past with this exemption authority.

In sum, granting the requested exemption is consistent with Department precedent and the public interest. Conversely, failure to issue the exemption would be at odds with Department precedent, inimical to the

public interest, and undermine the reasonable expectations of foreign carriers with respect to this exemption authority. It would compromise Alaska's role as an attractive, competitive international air cargo and passenger hub and an economical, efficient waypoint for intercontinental travel; it would increase the State's isolation; and it would encourage and buttress the efforts of Alaska's foreign competitors to act as international air cargo and passenger transfer, transit, and trans-shipment hubs of choice. Accordingly, the Department should grant the requested blanket exemption authority immediately for another period of not less than two years.

III. A DEPARTMENTAL STATEMENT ABOUT FUTURE EXTENSIONS IS WARRANTED.

As noted above, the State of Alaska is also requesting that the Department provide a clear indication in the renewed exemption authority to the effect that, absent extraordinary circumstances, the Department would anticipate routine multi-year extensions of this authority in the future. As the Department stated in the September 2018 NOAT (at 2),

Finally, we again note that, since Alaska first requested authority for expanded air cargo transfer flexibility at Alaskan international airports in 1996, Alaska has consistently established the public interest bases necessary for the Department to reach favorable disposition of its requests.

Barring an unforeseeable change in circumstances, we again see no reason why we would not continue to be favorably disposed towards renewal of this authority in the future.

Such a statement would significantly enhance Alaska's ability to attract foreign carrier service and compete with hubs in other countries.

Air carriers often look beyond two years when it comes to making significant commitments for new and/or expanded cargo services and facilities. For an air carrier to develop, construct, and/or expand its cargo operations to/from/via Alaska and an air cargo transfer hub there, the airline must make a long-term commitment with substantial financial/capital resources and a significant lead-time. This same principle applies to passenger operations. Without some level of reassurance or commitment by the Department to maintain this important exemption authority beyond the two-year period of effectiveness (as Alaska is asking for), foreign carriers may be reluctant to establish and expand such operations.

In order to provide such reassurance that this exemption authority will not be withdrawn or otherwise allowed to expire after a mere two additional years, thereby undermining Alaska's efforts to entice the air cargo and passenger activities and enhanced opportunities made possible by the renewed and amended exemption authority, the Department should provide the clear indication of its future expectations that the State of Alaska seeks.

* * *

WHEREFORE, for the foregoing reasons, the State of Alaska respectfully urges the Department to renew and amend the subject exemption authority consistent with the instant application.

Respectfully submitted,

Handwritten signatures of Robert E. Cohn and Patrick R. Rizzi in black ink.

Robert E. Cohn
Patrick R. Rizzi
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, DC 20004
+1 202 637 4999/5659

Counsel for
State of Alaska
Department of Law

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of the State of Alaska to Renew and Amend Exemption has been served this August 17, 2020, upon each of the following addressees:

robert.wirick@aa.com
chris.walker@delta.com; steven.seiden@delta.com
dan.weiss@united.com; steve.morrissey@united.com;
amna.arshad@freshfields.com
bob.kneisley@wnco.com
robert.land@jetblue.com
sllunsford@fedex.com
anita.mosner@hklaw.com
rpommer@atlasair.com; naveen.rao@atlasair.com
kevin.montgomery@polaraircargo.com
perkmann@cooley.com
rsilverberg@sbgdc.com
john@mietuslaw.com
matwood@cozen.com
dheffernan@cozen.com;
dhainbach@ggh-airlaw.com; agoerlich@ggh-airlaw.com
dkirstein@yklaw.com; jyoung@yklaw.com
pmurphy@lop-murphy.com
jfoglia@kmazuckert.com
mbenge@kmazuckert.com
wcallaway@kmazuckert.com
csimpson@kmazuckert.com
george.carneal@hoganlovells.com
george.tompkinsiii@wilsonelser.com
esahr@eckertseamans.com; dderco@eckertseamans.com
charles.donley@pillsburylaw.com
romanow@pillsburylaw.com
bdsmith@cov.com
wkaras@steptoe.com; cgosain@steptoe.com



Jessica E. Bartlett