

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
Land Division
Honolulu, Hawaii 96813

August 26, 2022

Board of Land and Natural Resources
State of Hawaii
Honolulu, Hawaii

OAHU

Issuance of Revocable Permit to SubCom, LLC, for Undersea Cable Depot
Purposes; Sand Island, Honolulu, Oahu, Tax Map Key (1) 1-5-041: portion of 333

APPLICANT:

SubCom, LLC, a Delaware limited liability company. (“SubCom”)

LEGAL REFERENCE:

Sections 171-11, 13, and 55, Hawaii Revised Statutes (“HRS”), as amended.

LOCATION:

Portion of Government land situated at Sand Island, Honolulu, Oahu, identified by Tax
Map Key (1) 1-5-041: portion of 333, as shown outlined in blue on **Exhibit A-1**.

AREA:

General Lease No. S-5219 covers a land area of 1.615 acres and 0.952 acre of submerged
land for berthing purposes.

The requested RP will cover fast lands only to include the exclusive use of the pan yard
(yellow area) and associated shared access (blue area) to it, shared use of the apron (area
delineated by a red dotted line), and access to the pier when SubCom is using it (**Exhibit
A-2**).¹

The 0.952-acre of submerged lands is not part of the requested revocable permit premises
and SubCom will follow the Hawaii Administrative Rules regarding the operation and
payment of the Honolulu Harbor managed by the Department of Transportation, Harbors
Division (“DOT”),

¹ Staff used the measurements of the leased premises shown on Exhibit A-2 to compute the square footage of the
respective areas described in this submittal. No ground survey was conducted to derive the areas.

ZONING:

State Land Use District: Urban
City and County of Honolulu LUO: I-3

TRUST LAND STATUS:

Section 5(b) lands of the Hawaii Admission Act
DHHL 30% entitlement lands pursuant to the Hawaii State Constitution: No

CURRENT USE STATUS:

Governor's Executive Order No. 4652 to Department of Land and Natural Resources,
Division of Aquatic Resources for Fishery Research Center and Related Purposes.

CHARACTER OF USE:

Undersea Cable Depot Purposes.

COMMENCEMENT DATE:

November 21, 2022.

MONTHLY RENTAL:

Staff recommends using the current monthly rent of \$0.81/square feet improved paved land adopted by DOT to calculate the monthly rent for the requested revocable permit, further subject to the approval by the Chairperson.

According to SubCom, the cables stored on the pans (i.e., the cable reels or spools) are actually owned by its clients, while SubCom manages the space and loading/unloading. At the present time, SubCom does not know the actual area that will be required by its clients for cable storage upon the expiration of the current holdover, as one major tenant is moving out of the premises at the end of this month. SubCom is requesting that the monthly rental be charged at current harbor rents, i.e., \$0.81/square feet only for the actual area used for the cable storage plus an associated circulation area around the pans.

No later than September 15, 2022, SubCom shall provide the information on the area used for cable storage and circulation area, and staff will seek approval from the Chairperson based on the above-mentioned approach and rental value.

The justification for charging SubCom only for the area in actual cable storage use is that it is in the best interest of the State of Hawaii to secure a stable and reliable telecommunication services in the State. The proposed arrangement will ensure any necessary repair will be effected promptly with the spare parts or cables available locally. Though the cable owners are actually for-profit entities, all of them operate systems that

service Hawaii. It is the general understanding that any increases in operational cost, e.g., rent, will be passed on the customers in the State. Therefore, staff does not have any objections to the above-described approach.

COLLATERAL SECURITY DEPOSIT:

Twice the monthly rental.

CHAPTER 343 - ENVIRONMENTAL ASSESSMENT:

In accordance with Hawaii Administrative Rules ("HAR") § 11-200.1-15 and -16 and the Exemption List for the Department of Land and Natural Resources reviewed and concurred on by the Environmental Council on November 10, 2020, the subject request is exempt from the preparation of an environmental assessment pursuant to General Exemption Type 1, Part 1, that states, "Operations, repairs or maintenance of existing structures, facilities, equipment, or topographical features , involving negligible or no expansion or change of use beyond that previously existing," Item 44, that states the "Permits, licenses, registrations, and rights-of-entry issued by the Department that are routine in nature, involving negligible impacts beyond that previously existing". The subject request is a de minimis action that will probably have minimal or no significant effect on the environmental and should be declared exempt from the preparation of an environmental assessment and the requirements of § 11-200.1-17, HAR, as a de minimis action.

DCCA VERIFICATION:

Place of business registration confirmed:	YES <u> x </u>	NO <u> </u>
Registered business name confirmed:	YES <u> x </u>	NO <u> </u>
Applicant in good standing confirmed:	YES <u> x </u>	NO <u> </u>

JUSTIFICATION FOR REVOCABLE PERMIT:

- A. Site issues make property unsuitable for public auction lease:
Not applicable. The site was legally subdivided with legal access when the original lease was issued in 1991.
- B. Truly short-term use:
The proposed revocable permit is planned to start upon the expiration of the current holdover on November 21, 2022. As explained in the submittal, the State administration supports the issuance of a long-term lease at the same site. However, due to processing time needed for a direct lease, e.g. appraisal, the continuous utilization of the present site through a revocable permit is prudent.
- C. Interim arrangements pending lease disposition:
See comments in bullet B.

- D. Testing market and operational issues, plan to go to lease later:
No applicable.
- E. Government uses:
Not applicable.
- F. Non-profits:
Not applicable.
- G. Staff unaware of interest in long-term disposition:
SubCom showed interest in securing a long-term disposition.
- H. Other unusual circumstances (provide explanation) Discussion:
Staff understands the subject location is the only undersea cable depot between Asia and the West Coast. Earlier this year, the volcanic eruption, tsunami, and earthquake that occurred in Tonga limited its communication with the rest of the world after the undersea communications cable was severed by the natural disaster. This event demonstrates the importance of having cable repair equipment available in Hawaii so that communications lost or degraded due to natural or other disaster affecting the State can be promptly restored.

REMARKS:

General Lease No. S-5219 was issued to AT&T Submarine Systems, Inc., for a term of thirty (30) years, commencing on November 21, 1991 and expiring on November 20, 2021. It encumbers 1.615 acres of wharf area for ship depot purposes, which includes a warehouse and sheds for housing of equipment. The lease also consists of 0.952 acre of submerged lands used for docking a communications cable laying ship. At its meeting of February 11, 2011, agenda item D-16. The Board gave its consent to the assignment of the subject lease to SubCom.

The Division of Aquatic Resources (DAR) utilizes the adjacent State parcel as a fisheries research center pursuant to Governor's Executive Order No. 4618. DAR expressed its interest in expanding the research center into the subject parcel upon the expiration of the lease in November 2021. At its meeting of January 22, 2021, the Board authorized setting aside the subject parcel to DAR as well as a 12-month holdover of the lease for SubCom, noting it would take time for SubCom to find and build out an alternate site for its cable depot.

Recently, SubCom informed the State that the relocation of the Honolulu cable inventory within 30 days is not possible due to "...the sheer number of cables stored and the time and manpower it takes to carefully load and offload sensitive electronic instruments." See SubCom's letter dated February 17, 2022 at **Exhibit B**. Therefore, SubCom requested a long-term lease to continue its operation in Hawaii.

After discussions among SubCom, the Department of Land and Natural Resources (DLNR) and the Department of Transportation, Harbors Division (DOT), the parties agreed that

DLNR would recommend to the Board that SubCom be allowed to continue using the fast land portions of the depot under a revocable permit. DLNR Staff will bring the request for a long-term direct lease pursuant to §171-59, HRS to the Board at a later date. With respect to the submerged land portions of the depot, including the pier, SubCom may continue to use the area in accordance with DOT's administrative rules.

Exhibit A-2 shows the respective areas to be occupied by SubCom, DAR, and DOT-Harbors for the duration of the revocable permit, and the same configuration will likely be recommended to the Board when staff returns with a request for a direct lease to SubCom. The various areas are represented as follows:

- Green Area (6,900 square feet) – warehouse exclusively used by DAR from November 21, 2022.
- Yellow Area (33,200 square feet) – open pan yard exclusively used by SubCom.
- Blue Area (19,900 square feet) – non-exclusive access to be used by DAR, DOT, and SubCom.
- Area within Dotted Red Line (10,310 square feet) – apron area exclusively used by SubCom when its ship is in the harbor with the proper notification given to DOT. For any other period, DOT can use the apron area.
- DOT Pier (0.952 acre) – to be managed and operated by DOT pursuant to its applicable Hawaii Administrative Rules.

The Board has authority under Section 171-11, HRS, to issue leases over lands set aside to other agencies to the extent the lease covers portions of the set-aside area “not presently utilized or required for the public purpose stated” In this case, DAR only requires exclusive use of the warehouse for its operations under Executive Order No. 4652 and has no objection to SubCom's exclusive use of the pan yard or the shared use of the other areas noted above.

Staff recommends the Board authorize the issuance of a revocable permit in accordance with the terms and conditions covered in this submittal.

RECOMMENDATION: That the Board:

1. Declare that, after considering the potential effects of the proposed disposition as provided by Chapter 343, HRS, and Chapter 11-200.1, HAR, this project will probably have minimal or no significant effect on the environment and is therefore exempt from the preparation of an environmental assessment as a de minimis action.
2. Authorize the issuance of a revocable permit to SubCom, LLC covering the subject area for undersea cable depot purposes under the terms and conditions cited above, which are by this reference incorporated herein and further subject to the following:
 - A. The standard terms and conditions of the most current revocable permit

form, as may be amended from time to time;

- B. When SubCom, LLC requires use of the pier immediately makai of the revocable permit premises, it shall submit its berthing reservation request to the Department of Transportation, Harbors Division, with a minimum five (5) days' advance notice for ordinary use and two (2) days' advance notice for emergency use;
- C. SubCom, LLC shall pay for the use of the pier mentioned in 2.B above pursuant to the rules of Department of Transportation, Harbors Division, regarding the operation of Honolulu Harbor;
- D. The Department of Land and Natural Resources, Division of Aquatic Resources, will retain the exclusive use of the warehouse and non-exclusive use of the access way to it;
- E. The Department of Transportation, Harbors Division, will retain use of the pier and any access when the pier is not in use by SubCom, LLC for loading and unloading cable;
- F. Review and approval by the Department of the Attorney General; and
- G. Such other terms and conditions as may be prescribed by the Chairperson to best serve the interests of the State.

Respectfully Submitted,

Barry Cheung

Barry Cheung
District Land Agent

APPROVED FOR SUBMITTAL:

Suzanne D. Case

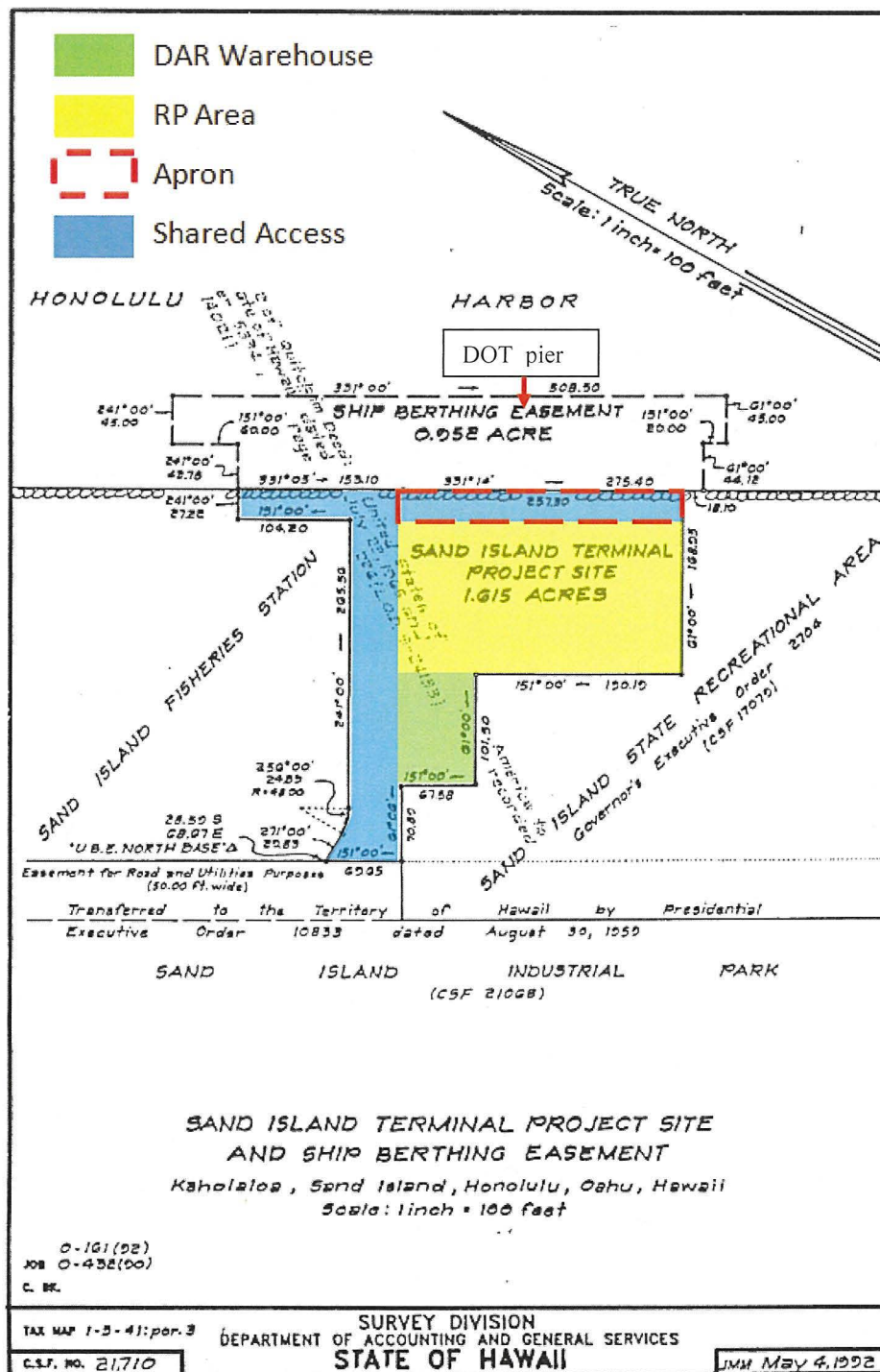
Suzanne D. Case, Chairperson *for*

RT



TMK (1) 1-5-041:333

EXHIBIT A-1



TMK (1) 1-5-041:333

EXHIBIT A-2



MaryAnn Brereton
General Counsel, Chief
Compliance Officer
SubCom, LLC

250 Industrial Way West
Eatontown, NJ 07724-2206 USA
Tel (+1) 732 578 7365

February 17, 2022

State of Hawaii
Board of Land and Natural Resources
DLNR Main Building
Kalanimoku Building
1151 Punchbowl Street
Honolulu, HI 96813
Attn: **Russell Tsuji, Administrator**

Re: SubCom, LLC General Lease No. S-5219, Sand Island, Honolulu, Oahu, Tax Map Key (1) 1-5-041:333

Good Afternoon Mr. Tsuji:

This is a request by the undersigned for consideration of SubCom, LLC as a “marine, maritime or maritime-related” operation for purposes of Hawaii Revised Statutes, Title 12, Sec. 171-59(b) and to permit it to enter into an extension of its current General Lease with the BLNR, with respect to the berth and pan yard only, through April 30, 2024.

The applicant, SubCom, LLC is a Delaware limited liability company that has held a direct General Lease (No. S-5219) with the BLNR since 1991 for the following purpose:

“Encumbered by General Lease No. S-5219 for terminal project site and ship berthing easement. The Lessee shall use or allow the premises leased to be used solely for commercial and industrial purposes of establishing a cable ship berth and depot for maintenance, repair, and storage of transoceanic submarine telecommunication cables.”

The original term of the lease was 30 years commencing on November 21, 1991 and expiring on November 20, 2021. On January 21, 2021, the BLNR approved an extension of that current direct lease until November 20, 2022.

SubCom hereby requests a second extension of General Lease No. S-5219, with respect to the berth and pan yard only, through April 30, 2024, or such longer period as the BLNR may permit in its discretion. The BLNR has authority to directly negotiate a lease with SubCom “where the public interest demands it...” Hawaii Revised Statutes, Title 12, Section 171-59(a).

To be entitled to a directly negotiated lease without public notice and bids pursuant to Title 12, Section 171-59(b), Hawaii Revised Statutes, (“the Statute”) an applicant must demonstrate that (i) it fits into one of nine specified industries, and (ii) the lease will encourage competition within that industry, as follows:

“(b) Disposition of public lands for airline, aircraft, airport-related, agricultural processing, cattle feed production, aquaculture, marine, maritime, and maritime-related operations may be negotiated without regard to the limitations set forth in subsection (a) and section 171-16(c); provided that:

EXHIBIT B



(1) *The disposition encourages competition within the aeronautical, airport-related, agricultural, aquaculture, maritime, and maritime-related operations...*(emphasis added).

SubCom was informed recently that its status as a “marine, maritime or maritime-related” operation under the Statute is a matter to be established before the Board. We respectfully submit the information in this letter in response.

We first note that SubCom has now maintained this direct General Lease with the BLNR for, as noted, over 30 years. In no time during what has proven to be a very good working relationship has it ever been suggested to SubCom that it was not a “marine, maritime or maritime-related” operation. The same is true of all of SubCom’s predecessors-in-name, including the original lessee named on the lease, AT&T Submarine Systems.

The Statute does not define “marine or maritime” but the plain meaning of these terms, as a casual look at the Merriam-Webster dictionary will tell you, is *“of or relating to navigation or commerce on the sea.”*

The Statute does contain a definition of “maritime-related” that is helpful, however, as follows:

For the purposes of this subsection:

...

“Maritime-related” means a purpose or activity that requires and is directly related to the loading, off-loading, storage, or distribution of goods and services of the maritime industry.”

SubCom’s sole purpose is to distribute, install and maintain industry-leading marine fiber optic cable systems in oceans across the globe. Its maritime roots run deep and wide:

- Through its wholly-owned subsidiaries including Transoceanic Cable Ship Company, LLC (“TCSC”), SubCom owns, operates and crews eight (8) sea-worthy cable ships which are purpose-built for laying, burying and maintaining and repairing cables on and under the seabed floor¹;
- SubCom maintains eight (8) other marine cable depots around the world for storage, maintenance and repair of spare undersea cables and related parts, and its ocean-going vessels shuttle between these depots to move subsea cables across the globe in service of its public utility, government and telecommunications customers; and
- SubCom manufactures marine cables and their related goods in its New Hampshire factory, all of which are designed for undersea use and sold commercially;

¹ Attached is a copy of the joint Certificate issued by the U.S. Coast Guard and U.S. Department of Homeland Security evidencing both ownership and operation of one of those ships, the Global Sentinel, by SubCom’s wholly-owned subsidiary TCSC. It was another of Global Sentinel’s sister ships (cable ship Reliance) that recently repaired the undersea cable damaged by the tsunami in Tonga. The Reliance serves more than 31,000 miles of undersea cables in the South Pacific.



- From SubCom's New Hampshire marine cable manufacturing plant, undersea cables are then loaded onto cable ship vessels to install around the world.

Some of these cables end up at the subject Depot in Honolulu. They are off-loaded there either by SubCom vessels or freighters belonging to other cable installation companies similar to SubCom. The spare cables stored there belong to many different owners, and SubCom maintains sub-leases with each of these different cable owners for space in the Honolulu Depot.

Because of the sheer number of cables stored, and the time and manpower it takes to carefully load and offload sensitive electronic instruments such as undersea fiber optic cables from a cable ship, SubCom must maintain cable depot leases that are longer in term than month-to-month. It would not be possible to move the Honolulu cable inventory in 30 days were SubCom to have a month-to-month permit terminated. It is for this reason that SubCom is before the Board requesting a lease extension for the pan yard and berth for seventeen months, and in any event longer than the month-to-month revocable permit currently under discussion.

There can be little doubt that SubCom is a "marine, maritime and maritime-related operation," as the Statute puts it. SubCom's sole purpose is commerce on the seas; it does not conduct its business anywhere else. It loads, offloads, stores and distributes its undersea goods from depots around the world, including Honolulu, to others involved in the same commerce on the seas. Without question it fulfills both the spirit and the letter of the Statute in this regard.

We ask you to consider SubCom's request for a General Lease extension relating to the pan yard and berth only beginning on November 21, 2022 and continuing through April 30, 2024.²

Best Regards,

A handwritten signature in blue ink, appearing to read "MaryAnn Brereton".

MaryAnn Brereton, Esq.
General Counsel, SubCom LLC

Via Email and Certified Mail, Return Receipt Requested

cc: Mr. Barry W. Cheung (via email only)
Mr. Christopher Carobene
Mr. James Herron
Mr. Ken Halcisak
Mr. Justin Cook
Mr. Gene Tyranski

² Pursuant to HAR Sec 13-1-29, an oral or written request for a contested case hearing must be made to the board no later than the close of the board meeting at which the subject matter of the request is scheduled for board disposition. We respectfully request that this letter constitute such written request, or that such request be waived for good cause, should the BLNR dispose of this matter unfavorably to SubCom.

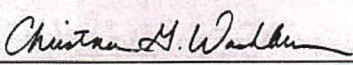


UNITED STATES OF AMERICA

DEPARTMENT OF HOMELAND SECURITY
UNITED STATES COAST GUARD

NATIONAL VESSEL DOCUMENTATION CENTER

CERTIFICATE OF DOCUMENTATION

VESSEL NAME GLOBAL SENTINEL		OFFICIAL NUMBER 973792	IMO OR OTHER NUMBER 8900866	YEAR COMPLETED 1990	
HAILING PORT BALTIMORE MD		HULL MATERIAL STEEL		MECHANICAL PROPULSION YES	
GROSS TONNAGE	NET TONNAGE	LENGTH	BREADTH	DEPTH	
13201 GT ITC	3960 NT ITC	434.0	70.9	37.1	
PLACE BUILT SINGAPORE					
OWNERS TRANSOCEANIC CABLE SHIP COMPANY LLC			OPERATIONAL ENDORSEMENTS REGISTRY		
MANAGING OWNER TRANSOCEANIC CABLE SHIP COMPANY LLC 1001 EAST MCCOMAS STREET BALTIMORE MD 21230					
RESTRICTIONS NO COASTWISE - FOREIGN BUILT, REGISTERED WITH A FOREIGN COUNTRY; NO FISHERY - FOREIGN BUILT					
ENTITLEMENTS NONE					
REMARKS NONE					
ISSUE DATE OCTOBER 08, 2021					
THIS CERTIFICATE EXPIRES OCTOBER 31, 2022		 DIRECTOR, NATIONAL VESSEL DOCUMENTATION CENTER			



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This certificate is not valid for operation of the vessel until the vessel is marked with the name, official number, and hailing port as shown on the certificate. The original certificate must be kept aboard the vessel at all times when in operation and must be presented upon the demand of federal, state or local officials for law enforcement purposes. Vessels with only a recreational endorsement may not engage in commercial trade.

Documented vessels may be registered by states for tax and other purposes and may be required to display a state decal. This certificate is valid for one year. Renewal is the responsibility of the owner. This certificate must be surrendered to the National Vessel Documentation Center (NVDC), 792 T J Jackson Drive, Falling Waters, West Virginia 25419, upon a change in ownership, change in state of incorporation, or a change in any other element shown on the certificate other than change of address. This certificate is invalid for any vessel other than one documented solely for recreation when the vessel is placed under the command of a person who is not a citizen of the U.S. The vessel and its equipment are liable to seizure and forfeiture to the U.S. government and the owner is liable for a civil penalty of not more than \$10,000.00 per violation. Each day of a continuing violation is a separate violation.

Any change in address of the managing owner must be reported promptly to the NVDC. You may contact us at (304) 271-2400.

Note: The certificate on the face of this document is not conclusive evidence of title in any proceeding where ownership is in issue. Complete records are on file at the NVDC. The sale or transfer section below is provided for convenience only.

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100% OF THE VESSEL IDENTIFIED HEREIN IS SOLD (TRANSFERRED) BY THE OWNER(S) NAMED ON THE FACE OF THIS CERTIFICATE TO THE FOLLOWING PERSON(S). ADDRESS MUST BE INCLUDED.

IF SOLD (TRANSFERRED) TO MORE THAN ONE PERSON, THE PURCHASER(S)/TRANSFeree(S) ARE TENANTS IN COMMON, EACH OWNING AN EQUAL UNDIVIDED INTEREST, UNLESS OTHERWISE INDICATED HEREIN: CHECK ONLY ONE OF THE FOLLOWING BLOCKS TO SHOW ANOTHER FORM OF OWNERSHIP.

☐

JOINT TENANCY WITH RIGHT OF SURVIVORSHIP

☐

TENANCY BY THE ENTIRETIES

☐

COMMUNITY PROPERTY

☐

OTHER

SIGNATURE OF SELLER(S)/TRANSFEROR(S) OR PERSONS SIGNING ON BEHALF OF SELLER(S)/TRANSFEROR(S):

DATE SIGNED:

NAME(S) OF PERSON(S) SIGNING ABOVE, AND LEGAL CAPACITY IN WHICH SIGNED (E.G. OWNER, AGENT, TRUSTEE, EXECUTOR)

ACKNOWLEDGMENT (TO BE COMPLETED BY NOTARY PUBLIC OR OTHER OFFICIAL AUTHORIZED BY A LAW OR A STATE OR THE UNITED STATES TO TAKE OATHS.)

ON _____ THE PERSON(S) NAMED
(DATE)

STATE:

COUNTY:

ABOVE ACKNOWLEDGED EXECUTION OF THE FOREGOING INSTRUMENT
IN THEIR STATED CAPACITY(IES) FOR THE PURPOSES THEREIN CONTAINED.

NOTARY PUBLIC

MY COMMISSION EXPIRES:

PRIVACY ACT STATEMENT

IN ACCORDANCE WITH 5 USC 552(A). THE FOLLOWING INFORMATION IS PROVIDED TO YOU WHEN SUPPLYING PERSONAL INFORMATION TO THE U.S. COAST GUARD:

1. AUTHORITY. SOLICITATION OF THIS INFORMATION IS AUTHORIZED BY 46 USC CHAPTER 313 AND 46 CFR, PART 67.
2. THE PRINCIPAL PURPOSES FOR WHICH THIS INSTRUMENT IS TO BE USED ARE:
 - (A) TO PROVIDE A RECORD, AVAILABLE FOR PUBLIC INSPECTION AND COPYING, OF THE SALE OR OTHER CHANGE IN OWNERSHIP OF A VESSEL WHICH IS DOCUMENTED, WILL BE DOCUMENTED, OR HAS BEEN DOCUMENTED PURSUANT TO 46 USC, CHAPTER 121.
 - (B) RETENTION FOR EXAMINATION BY GOVERNMENTAL AUTHORITIES AND MEMBERS OF THE GENERAL PUBLIC.
3. THE ROUTINE USE WHICH MAY BE MADE OF THIS INFORMATION INCLUDES DEVELOPMENT OF STATISTICAL DATA CONCERNING DOCUMENTED VESSELS.
4. DISCLOSURE OF THE INFORMATION REQUESTED ON THIS FORM IS VOLUNTARY. HOWEVER, FAILURE TO PROVIDE THE INFORMATION COULD PRECLUDE FILING OF A BILL OF SALE AND DOCUMENTATION OF THE VESSEL NAMED HEREIN PURSUANT TO 46 USC CHAPTER 121. MOREOVER, BILLS OF SALE WHICH ARE NOT FILED ARE NOT DEEMED TO BE VALID AGAINST ANY PERSON HAVING ACTUAL KNOWLEDGE OF THE SALE. (46 USC 31321 (A)).

AN AGENCY MAY NOT CONDUCT OR SPONSOR, AND A PERSON IS NOT REQUIRED TO RESPOND TO A COLLECTION OF INFORMATION UNLESS IT DISPLAYS A VALID OMB CONTROL NUMBER.

THE COAST GUARD ESTIMATES THAT THE AVERAGE BURDEN FOR THIS FORM IS 20 MINUTES FOR COMPLETING AND 5 MINUTES FOR FILING. YOU MAY SUBMIT ANY COMMENTS CONCERNING THE ACCURACY OF THIS BURDEN ESTIMATE OR ANY SUGGESTIONS FOR REDUCING THE BURDEN TO: U.S. COAST GUARD, NATIONAL VESSEL DOCUMENTATION CENTER, 792 T J JACKSON DRIVE, FALLING WATERS, WEST VIRGINIA 25419 OR OFFICE OF MANAGEMENT AND BUDGET, PAPERWORK REDUCTION PROJECT (1625-0027), WASHINGTON, DC 20503.

AV 631587222419