



4751 Fox St. Denver, CO 80216

Thank you for responding to the CMRS code.  
For clarify please identify this is a letter of intent for a variance of use application.

**Letter of Intent**  
**Written Responses to the El Paso County CMRS Zoning Code**

To: El Paso County  
Planning and Community  
Development

From: Kenneth Trujillo – Agent for T-Mobile – Applicant  
4751 Fox St. Denver CO 80216  
719-205-9370  
Ken@uci2.net

Subject: DN02728A - T-Mobile Temporary Tower

Date: 5/8/2024

Location: S Powers Blvd and Fontaine Blvd

Address: No address assigned at the time of this submission  
Latitude: 38.738106° Longitude: -104.682031°

Parcel #: 5500000015

Zoning: A-5 (Agricultural) CAD-O

Valuation: \$40,000.00

Owner: State of Colorado  
David Rodenberg – Tower Site Manager - Owner  
P 303.866.3454 ext. 3328  
1127 Sherman Street Suite 300, Denver, CO 80203  
david.rodenberg@state.co.us

PCD File: VA242

Below in **black** is the applicable code in regard to our CMRS project. Also below in **red** are our responses to this code.

**5.2.19. Commercial Mobile Radio Service Facility (CMRS) Facilities**

**(A) General.**

(1) **Purpose.** The purposes of this Section are:

- To facilitate the provision of wireless telecommunication services, including personal wireless services, throughout the unincorporated area of El Paso County;
- To allow the location of commercial mobile radio service facilities (CMRS facilities) in El Paso County subject to certain standards;
- To encourage co-location of CMRS facilities; and

- To prevent unreasonable discrimination among providers of functionally equivalent services. **Acknowledged.**

(2) **Applicability.** The standards in this Section apply to all **CMRS** facilities located, constructed or modified after the effective date of this Code. **Acknowledged.**

(3) **Relationship to Other Provisions.** A **CMRS** facility shall comply with all applicable provisions of this Code. Where a conflict exists between the requirements of this Section and another applicable standard in this Code, the most restrictive standard shall control. Where a conflict exists between the requirements of this Section and another applicable State or Federal standard the State or Federal standards shall control. **Acknowledged.**

**(B) General Standards.**

(1) **Co-Location.** Co-location of **CMRS** facilities is encouraged when feasible to minimize the number of **CMRS** facility sites. To further the goal of co-location:

- An applicant for a new freestanding **CMRS** facility shall demonstrate that a good faith effort has been made to co-locate on existing **CMRS** facilities. The applicant shall demonstrate that due to physical constraints, or economic or technological infeasibility, no such location or co-location is available. The applicant shall also demonstrate that contact has been made with the owners of all suitable structures within the search area of the proposed site and was denied permission to locate its **CMRS** facility on those structures; This application is the result of the current T-Mobile site going away. **There were no existing **CMRS** facilities in the immediate area that could be collocated to that would replace the existing site's coverage. As you can see in the below map, this area is highly residential with no tall buildings or existing towers in the immediate area. We started by checking the Horizon Tower located to the North at 38.740949° -104.693662°. However, this tower is too far away from the neighborhoods that is set to lose their cellular coverage. This tower would not provide us with the coverage we are about to lose. Because this tower is too far to the Northeast it would only cover the Northeast side of the neighborhood leaving many residents without replacement coverage. We tried to collocate at the neighboring Widefield School District School Sunrise Elementary School on the existing internet pole. However, the school district did not want to lease to us and was not interested in a deal. There was interest in a deal at the Security Fire Dept station #4 property. This is a potential site for a tower in the future but at this time we are still doing preliminary research on this parcel. This fire dept is also much further South and would also require variances to its use like this property. As you can see in the below map, there are no other eligible facilities or commercial / industrial properties to attach to. T-Mobile has a great relationship with the State of Colorado and to expedite the leasing of this emergency temp site we went to this empty field that has the most setbacks from houses and seems like the most favorable choice for temporary tower.**



- If a telecommunications competitor attempts to co-locate a **CMRS** facility on an existing or approved **CMRS** facility or location, and the parties cannot reach an agreement, the County may require a third-party technical study to be completed at the expense of both parties to determine the feasibility of co-location; and **There were no existing **CMRS** facilities in the immediate area that could be collocated to that would replace the existing site's coverage.**

- All facilities shall be designed and constructed to allow for co-location of a minimum of 2 users except for a small cell **CMRS**, pole mounted **CMRS**, or those otherwise specifically exempted by the BOCC. **This tower will be a temporary tower. This will be a pole mounted CMRS and will be just for T-Mobile's use. It is highly unlikely that another carrier would want to collocate at a temporary location such as this one. However, in the highly unlikely event that a carrier would want to collocate, we would support it.**

(2) **Compliance with FCC Standards.** At the request of the PCD Director, which request shall occur no more than once per year, **CMRS** facility owners and operators shall certify that:

- The **CMRS** facility complies with the current FCC regulations prohibiting localized interference with reception of television and radio broadcasts; and **T-Mobile only broadcasts on spectrum licensed by the FCC and will not interfere with the reception of television and radio broadcasts**

- The **CMRS** facility complies with the current FCC standards for cumulative field measurements of radio frequency power densities and electromagnetic fields.

In adopting this requirement, the County is not attempting to regulate radio frequency power densities or electromagnetic fields, which regulation is controlled by the FCC. **This site will adhere to all FCC regulations and guidelines. T-Mobile will operate only on licensed FCC spectrum and will operate its equipment within all FCC standards for cumulative field measurements of radio frequency power densities and electromagnetic fields.**

(3) **Abandonment and Expiration.** If the CMRS facility ceases operation for any reason for a period of one year:

- The CMRS facility shall be removed within 6 months of the expiration; and

This is a temporary site and it will only be in use for up to two years. This model of temporary tower is specifically designed to be easily removed at the end of its usefulness. Once a permanent location is developed, this tower will be removed and the area will be restored to its current undeveloped state.

- Any permit or approval authorizing the CMRS facility shall be considered expired. At the end of the temporary tower's usefulness, we will remove the tower and we acknowledge that the temporary tower's permits will then be expired.

(4) **Application Approval or Denial.** In considering an application for a CMRS facility, the County shall base its decision as to the approval or denial of the application on whether the proposed CMRS facility meets the design standards set forth in this Section and any approval criteria associated with the applicable application or review process. **Acknowledged.**

(5) **Accessory Equipment for a CMRS Facility.** All accessory equipment for a CMRS Facility shall be 100% screened from view. All equipment shelters shall be located within the lease area for the CMRS facility. No equipment storage shelter shall exceed 15 feet in height. Equipment storage shelters shall be grouped as closely together as practical, so as to minimize impact on adjoining properties. The total area of all accessory equipment, including equipment storage shelters, shall not exceed 400 square feet per CMRS facility, except for a small cell facility where 17 square feet shall be the maximum allowed. **The accessory equipment for this tower will be shielded from view by a 6' tall slated chain-link fence. All equipment will be housed within the fenced in lease area. None of the accessory equipment will exceed 15 feet. The equipment is grouped as closely as possible given the clearance needed for the generator. The footprint of the equipment is 8'x8'. The footprint of the Tower base will be 32'x32'. The Generator will be 14'x5'.**

(6) **Standards for Freestanding CMRS Facilities.**

(a) **Tower/Structure Removal Agreement.** Prior to commencing construction of a new freestanding CMRS facility or any alteration of an existing freestanding CMRS facility, a Tower/Structure Removal Agreement shall be signed by the owner of the property and filed for recording with the Clerk and Recorder. **Acknowledged. This will be a temporary tower that is designed to be removed easily.**

(b) **Financial Assurance Required.** Prior to commencing construction of a new freestanding CMRS facility or any alteration of an existing freestanding CMRS facility, the owner of a freestanding CMRS facility shall be required to provide the County with adequate financial assurance to cover removal of the facility if abandoned. The form of financial assurance shall be approved by the PCD Director. New financial assurance will be required

prior approval of alteration of an existing freestanding CMRS facility and when the ownership of the lease or facility changes hands. **Acknowledged. This will be a temporary tower that is designed to be removed easily.**

**(c) Minimum Setbacks for Freestanding CMRS Facilities.**

(i) Located Within 250 Feet of Residential Zoning District. A freestanding CMRS facility located within 250 feet of any property zoned for residential use shall be set back from any residential property line one foot of distance for every foot of facility height (as measured from grade elevation), plus an additional 10 feet. **This 60' tall temporary tower will be set back 70' from the West property line (Powers Blvd) and 100' from the South property line (Fontaine Blvd). There are no residential properties that directly touch this parcel but to the south are properties on the South side of Fontaine Blvd.**

(ii) Located Over 250 Feet from Residential Zoning District. A freestanding CMRS facility located greater than 250 feet from property zoned for residential use shall meet the minimum setback requirements for structures and structures of the underlying zoning district and located in a manner to contain any freefall or icefall on the same property. **N/A**

**(d) Maximum Height for Freestanding CMRS Facilities.** A freestanding CMRS facility, including antennae, shall not exceed the maximum structure height limit in the zoning district unless otherwise specifically authorized as a part of the special use or variance of use approval. Any tower that exceeds 200 feet shall require FAA approval prior to approval of a special use or variance of use. **This property's zoning is A-5: Agricultural (5 acres) this tower will meet all set back requirements of one foot of setbacks for one foot of height plus ten feet. This 60' tower will be below the 200' FAA limit in this section of code.**

**(e) Administrative Special Use or Variance of Use Amendment.** The PCD Director may administratively amend the special use or variance of use approval for a minor modification to the CMRS facility provided the modifications do not constitute a Substantial Change. A modification constitutes a Substantial Change if:

(i) It increases the height of the tower by more than 10% or by the height of one additional antenna array with separation from the nearest existing antenna not to exceed twenty feet, whichever is greater; for other eligible support structures, it increases the height of the structure by more than 10% or more than ten feet, whichever is greater. Changes in height should be measured from the original support structure in cases where deployments are or will be separated horizontally, such as on buildings' rooftops; in other circumstances, changes in height should be measured from the dimensions of the tower or base station, inclusive of originally approved appurtenances and any modifications that were approved prior to the passage of the Spectrum Act; **N/A**

(ii) It involves adding an appurtenance to the body of the tower that would protrude from the edge of the tower more than twenty feet, or more than the width of the tower structure at the level of the appurtenance, whichever is greater; for other eligible support structures, it

involves adding an appurtenance to the body of the structure that would protrude from the edge of the structure by more than six feet; N/A

(iii) For any eligible support structure, it involves installation of more than the standard number of new equipment cabinets for the technology involved, but not to exceed four cabinets; or, for base stations, it involves installation of any new equipment cabinets on the ground if there are no pre-existing ground cabinets associated with the structure, or else involves installation of ground cabinets that are more than 10% larger in height or overall volume than any other ground cabinets associated with the structure; **This is not an eligible support structure**

(iv) It entails any excavation or deployment outside the current site; **This is not an existing site and the only excavation will be some leveling of the tower location.**

(v) It would defeat the concealment elements of the eligible support structure; or **This is not an existing site**

(vi) It does not comply with conditions associated with the siting approval of the construction or modification of the eligible support structure or base station equipment, provided however that this limitation does not apply to any modification that is non-compliant only in a manner that would not exceed the thresholds identified in the Middle Class Tax Relief Act of 2012. **This is not an existing site.**

(f) **Design Standards for Freestanding CMRS Facilities.** A freestanding **CMRS** facility shall adhere to the following design standards to minimize impacts:

(i) **Compatible with Surrounding Area.** A freestanding **CMRS** facility shall be designed to be compatible with surrounding buildings and structures and existing or planned uses in the area, subject to any applicable FAA regulations. **This temporary tower will ensure the surrounding buildings and structures continue to get the T-Mobile services they depend on. All FAA regulations will be adhered to.**

(ii) **Existing Vegetation.** Existing land forms, vegetation and structures shall be used to screen the facility from view and blend in with the surrounding environment, to the extent practicable. Existing vegetation shall be preserved or enhanced, where feasible. **There is only one tree on this very large property and it will not be disturbed by this temporary project. The very large parcel is just sticker bushes and local grass.**

(iii) **No Lighting.** The facility antennae shall not be lighted unless required by the FAA and authorized by the permit or approval. **No lighting is being proposed.**

(iv) **Dangerous Equipment and Attractive Nuisance.** Any equipment that could be dangerous to persons or wildlife shall be adequately fenced. The attractive nuisance potential shall be minimized through fencing and methods to discourage unauthorized climbing. **The T-Mobile**

equipment will be screened by a slated fence. Barbed wire is proposed to discourage unauthorized climbing.

(v) Dish Diameter Limited. The diameter of a microwave dish antenna shall not exceed 4 feet. The proposed microwave DISH will be 2' in diameter.

(g) **Photo Simulations Required.** Photo Simulations are to be provided for any new freestanding CMRS facility or for a Substantial Change to an existing freestanding CMRS facility. The Photo Simulations shall illustrate a minimum of three different views of what the site will look like once the antennae and associated equipment have been installed. Photos and Photo Simulations should show the "existing" and "proposed" conditions. These photo sims have been included in this package.

(7) **Stealth CMRS Facility Design Standards.** A stealth CMRS facility shall meet the same design standards and maximum height allowance as a freestanding CMRS facility. This temporary tower will not be a stealth tower.

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### **T-Mobile is requesting a variance on the strict enforcement of the below**

The property 5500000015 is located within the Agricultural (A-5) zoning district which does not permit free standing CRMS towers as a principal use. The only way to gain land use approval would be through a variance of use application. Despite the tower being temporary we would still require full land use and site development plan approval.

This land has not yet been developed and has no principle use identified. As a result, this temporary tower has defaulted to this 320 acre parcel's primary use. This is somewhat unusual that a parcel's primary use would be for a temporary tower and we would like to request a variance to this determination. It is unusual that a property of this size has no current identified use but this is the rare situation that we find ourselves in. We would like El Paso County to consider allowing a temporary tower as an accessory use on this property while we work to develop a new replacement tower in the area.

The reason T-Mobile is requesting a 60' tower at this location is to replace the coverage that is set to be lost when our current antennas are taken down at the end of this month. T-Mobile's current antennas are attached to the Widefield Water Tank. This structure is a very large water tank and T-Mobile's antennas currently are set at 85' on the water tank. T-Mobile's surrounding network was developed with this site's tall coverage as a centerpiece of its

coverage in the Widefield Community. All other surrounding T-Mobile sites were based on there being a tall tower (water tank) in the middle of this community.



For this emergency replacement site, we need to replace this site with a tall 60' tower to replace the coverage the community is about to lose. This temporary tower will not be permanent and is just a stop gap while we find a permanent suitable replacement. The strict application of the provisions of the height limitations would result in exceptional practical difficulties and undue hardship. Limiting this temporary tower's height below 60' would only replace about half of the covered neighborhood with the coverage they depend on. There are no other tall structures in this area that we could easily replace this site's coverage and this tower is one of the most critical and most used sites in T-Mobile's network. We are seeking a variance to allow this tower and height at this location as we work with El Paso county on an alternate site in the area. This temporary location would have the least impact on the surrounding properties, have the most set backs form other properties, and would allow for the community to continue using the network they depend on while a permanent location is developed. This current undeveloped field has no close neighbors that it would block any views and the additional height will not affect the character of the area. However, the height will be crucial for allowing the existing wireless and internet users access to our network.



In the initial review we were asked to explain how this variance of use would be consistent with the El Paso County Master Plan. Below is the master plan language and we feel that this project is consistent with the objectives listed below.

#### Telecommunications

Broadband services, including digital subscriber line (DSL), cable, or fiber, generally are widely available in and around Colorado Springs and in Front Range communities along the I-25 corridor. Broadband service is sparser in the eastern part of the County, but is available in some areas, particularly in the more



densely developed communities. Terrestrial fixed or terrestrial mobile wireless services are available across most of the County. Cellular service from major carriers is widely available in and around Colorado Springs, including the Cimarron Hills, Fountain, and Manitou Springs areas, and along the I-25 corridor. In the eastern part of the County, cellular service is more limited, with the primary coverage areas along Highway 24. Out of a total of over 235,000 occupied housing units in the County, approximately 97 percent had telephone service, while the remaining three percent (approximately 6,400 housing units) had neither landline nor cellular telephone service.

Residents and businesses in more rural areas and areas with lower population density are generally served by fixed wireless, cellular, or DSL. These technologies underperform the standard of service for broadband. In order to address underserved areas, the County should develop assets that align to a strategic plan and make them available through partnerships with the private sector.

These assets are often referred to as “broadband currency” because they can be brought to the table and used to assist other governmental functions and leverage private sector participation. The County does not have current policies or a formal basis in which to identify, purchase, lease, or share assets like fiber optic cable, conduits, building/tower sites, etc. The 2019 Broadband Strategic Plan for El Paso County recommended the following strategic recommendations to improve broadband access throughout the County.

**We agree with all of the above and the need for continuous coverage and reliable coverage has never been as important as it is today. The stats provided in the above Master Plan paragraph show just how important our services are to the community. This project will allow us to continue providing this critical service and meet El Paso County’s strategic goals to allow for service and expand service when we find a new site.**

#### **Create Public-Private Partnerships to Extend Broadband**

The County recognizes the importance of improving broadband access for underserved El Paso County residents. Real broadband service throughout the County will drive social and economic benefits for businesses, residents, and the public sectors. The creation of effective public-private partnerships will enable the County to target the use of scarce resources such as staff time and County budget to the areas in which the highest potential impact can occur.

**We are seeking El Paso County’s approval on this project that will allow this community to continue its internet and cellular services. We are seeking to work as partners for this project as well as work together to identify a permanent replacement site that will work for T-Mobile and EL Paso County. We believe that working together on a permanent site will build a partnership that will allow for coverage throughout the county and this expanding community specifically. We seek approval of this temporary site and continued discussion on a permanent site.**

#### **Be Proactive in Working with Public and Private Sectors**

Because telecommunications services are deployed relatively rapidly, it is important for the County to have existing strategic plans and existing relationships with the private sector. The County should consider creating a working group with these providers that would meet quarterly to discuss issues of interest to both the County and their private partners.

**Telecom services are deployed rapidly and we often have emergency situations like this one in which we need to act quickly. When networks have critical sites like this one set to come down, we need to replace them quickly. Often times, codes are not written to consider these types of emergency replacement situations. We seek understanding on this and approval of this variance. We would love if there were strategic plans in place for emergency situations such as this one. We are willing to meet with the county and have working groups to discuss how to support emergency relocation projects. Wireless services and internet are as critical as the traditional utilities we think of and we cannot have lapses in coverage. We**

would like a proactive approach to planning for these types of situations but in the meantime we seek leniency for a temporary site at this location.

#### Align Projects to Mutual Needs

The County should create key Targeted Improvement Zones and additional projects that can improve services for underserved populations. This would serve as a continuation of the 2019 Broadband Strategic Plan to identify paths in which the deployment of fiber and conduit can create a platform for future private-sector service enhancement.

T-Mobile must cover every part of El Paso County per their requirements with the FCC. This community is no different and we seek to continue our high-quality coverage of the community with our temporary tower and align our current and future project with El Paso County's goals.

#### Identify, Champion & Provide Resources to Implement

One of the most crucial recommendations, is to create a structure of both resources and an internal organization structure to sustainably execute this plan. The implementation champion(s) need not be a technology professional but must be someone who has a strong grasp of the value to the County of implementing this study's recommendations. Importantly, due to the need for cooperation by multiple functions within the County's structure, these champions must not only have a passion for the initiative, but also have the authority and the political capital to influence across County departments in order to drive successful outcomes

We agree with this goal. Hiring telecommunication professionals would be a big help to most jurisdictions in understanding our needs. Site identification and development takes a lot of technical knowledge about telecom. We are happy to provide input to El Paso County should they hire a champion to support telecommunication growth. We hope that a champion is hired to help develop flexible codes that allow telecom to develop their networks quickly and responsibly to meet the needs of the community. We want to provide wireless services to the community so that community members of the Widefield District are successful in their daily lives at home, at work, and at play. Sometimes the codes are too restrictive from the view point of telecommunication companies and working with a telecommunication champion is a great way to find middle ground on the codes.

For all of the reasons listed above, we believe that this variance of use is generally consistent with the intent of the Master Plan telecommunications goals. The Master Plan seeks to encourage partnership, expanded coverage, and flexibility. This project does need additional approvals but we hope that El Paso County can work with us on this temporary site to allow for this critical service to continue.

A detailed analysis summarizing how the request complies with each of the following Criteria of Approval in Chapter 5 of the Land Development Code:

The strict application of any of the provisions of this Code would result in peculiar and exceptional practical difficulties or undue hardship

Processing this strictly as a primary use rather than an accessory use would drastically hurt T-Mobile's ability to continue providing service to the surrounding area that depends on this service. This unimproved property is a great location to continue T-Mobile's service in the area while a more permanent location can be identified and developed. This property has the most amount of setbacks from other uses and is a great location for a temporary tower that will not affect the nearby properties. It is out of the way and not breaking up any views or

imposing on a nearby property. The strict application of any of the provisions in this code would lead us to a site that would be less favorable than this site and create gaps in service to the community.

The proposed use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the surrounding area, not detrimental to the future development of the area, and not detrimental to the health, safety, or welfare of the inhabitants of the area and County

T-Mobile has been providing great wireless services to this community for years from the water tanks. The surrounding community depends on T-Mobile's services and internet. This cell site will operate under all safety measures set forth by the FCC and FDA. This temporary site will operate no different than the site that has been in operation for years on the water tank.

The proposed use will be able to meet air, water, odor or noise standards established by County, State or federal regulations during construction and upon completion of the project

T-Mobile's project will be able to meet air, water, odor or noise standards established by County, State or federal regulations through out this project.

The proposed use will not adversely affect wildlife or wetlands

This temporary project will not affect wildlife or disturb the ground. This is a temporary tower that will not have a permanent foundation. The lands is not a wetland. This temporary tower's footprint will not affect the nearby wildlife in any way. During the intital review of this application District Wildlife Manager Philip Gurule of Colorado Parks and Wildlife (CPW) wrote provide the following confirmation. "Based both on the location and type of action being proposed, CPW believes impacts to the wildlife resource to be negligible. We appreciate being given the opportunity to comment. Please feel free to contact District Wildlife Manager Philip Gurule at 719-828-4960 should you have any questions or require additional information." This property is located within the "4 - High" wildlife impact potential area; however, our project takes up a very small footprint and will not impede wildlife movement or maker any permanent changes to the surrounding grasslands.

The applicant has addressed all off-site impacts

This site will not have any off site impacts to the surrounding community.

The site plan for the proposed variance of use will provide for adequate parking, traffic circulation, open space, fencing, screening, and landscaping.

This unmanned cell site will not need any parking and will not adversely affect nearby traffic. This privately owned large parcel is currently unimproved and this very small project will not affect any open space available to the public. No access to the public is currently available on

this land owned by the State of Colorado. The project will be fenced by a slated chain-link fence. The fence will screen the ground equipment. No alterations to the existing landscaping is being proposed. Upon the development of a permanent tower in the area, this temp tower will be removed and the area will be restored to its current state. This site will be constructed in about a week in which 4-5 tech trucks will enter the site and set up the temporary tower. During the construction, the work will be done on the parcel and we will not be parking on the road. When the tower is up and operational it will be unmanned and not have any traffic increases/impacts as a result of it being installed. We likely would have one tech visit the site about two times a week while it becomes operational. Once it is up an running there will be minimal if any visits to the site.

Sewer, water, storm water drainage, fire protection, police protection, and roads will be available and adequate to serve the needs of the proposed variance of use as designed and proposed

This tower will not affect sewer, water, or storm water drainage infrastructure. Cell towers do not utilize water or sewage. No underground work is being proposed with this project.

This temporary tower will be critical in ensuring that the 911 services that fire protection and police protection rely on will not be disturbed. Many T-Mobile customers rely on T-Mobile's services and 911 accessibility for fire protection and police protection.

**This property is in the Commercial Airport Overlay District.** UCI2 Construction Services LLC has reached out to Colorado Springs Airport and determined what they need for approval of the project. Colorado Springs Airport is requesting an FAA determination of no hazard via the 7460-1 Filing process. On 4-11-2024, an FAA application was submitted to the FAA under application 2024-ANM-2285-OE. This FAA application is routing in the FAA's system. We will obtain a FAA determination of hazard and no issues are expected. This process is a six week process and we are hoping that this variance of use can be approved with this FAA approval forthcoming. The frequencies we are deploying are no different than the ones currently broadcasting from the water tank. As soon as the FAA determination of no hazard is provided, we will attach it to this application. Proof of submittal is attached.

Respectfully,

*Kenneth Trujillo*

Site Acquisitions / Project Manager

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