

Wireless Antennas and Poles in Our Rights of Way



March 22, 2017 10:45 am - Noon
Room 201, Lansing Center

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PROTEC

 **KITCH**
Attorneys & Counselors

Why are we Here?

“Sprint...to cut...network costs by relocating to...government-owned properties, which cost much less.”

<http://www.recode.net/2016/1/15/11588832/sprint-finalizes-plan-to-trim-network-costs-by-up-to-1-billion>

Cell Tower Update: Conventional Cell Towers & DAS/Small Cell Siting Issues

“Unregulated DAS & Small Cell Siting in our rights of way means multiplying the number of utility poles (and some 120’ tall) along our streets by as much as a factor of 4. All in the name of the industry passing their costs to our taxpayers”

-Anon

Cell Tower Update: Conventional Cell Towers

The Way We Were

47 USC § 332 - Mobile services

- “(7) **Preservation of local zoning authority** (A) **General authority** Except as provided in this paragraph, nothing in this chapter shall limit or affect the authority of a State or local government or instrumentality thereof over decisions regarding the placement, construction, and modification of personal wireless service facilities.”
- (B) **Limitations** (i)...(I) shall not unreasonably discriminate among providers...(II) shall not prohibit or have the effect of prohibiting the provision of personal wireless services.
- ...shall act...within a reasonable period of time...
- (iii)....Any decision by a State or local government...shall be in writing and supported by substantial evidence...
- (iv) No State or local government...may regulate...on the basis of ... radio frequency emissions...
- (v)... within 30 days after such action or failure to act, [a provider must] commence an action in any court of competent jurisdiction.

The Way We Are

Mobile Industry Background

- Obama Administration Endorses Mobile as Part of National Broadband Plan
- **Millions** of New Antennas Needed to Cover the Nation and feed our Smart Phones and Machine to Machine Connections
- Avg: 20-40,000 new Antennas/State
- **Result: Industry Desperate = Increased Market Value** for Antenna Sites as Landlords of Cell Towers, Water Towers, Municipal Buildings etc
- Industry Also Trying to Shape Streamlined Regulation...

“New” Federal Law

- **FCC 2009 Shot Clock Order**
 - Reasonable Time to Act = 90 Days (Collocation)
150 days (New)
- **Congress**
 - HR 3630 February 2012
 - Sec 6409 (47 USC 1455)
 - ...”a State or local government may not deny, and shall approve, any eligible facilities request for a modification of an existing wireless tower or base station that does not substantially change the physical dimensions of such tower or base station...”
- **FCC Guidance on Section 6409(a)**
 - Now applies to DAS? Not on Muni Property
- **US Supreme Court: Arlington v FCC**
 - Shot Clocks Upheld
- **FCC: NOI Broadband Deployment Acceleration**

“New” State Zoning Law

- **2012 PA 143;MCL 125.3514 Cell Tower Collocation**
 - Objected to by PROTEC, MML and MTA
 - **Passed/Effective May 24, 2012**
 - Local Government Foreclosed from regulating
 - 20’/10% Height Increases
 - Unlimited Width Increases
 - Increases up to 2500 sq ft base
 - 14 Day Shot Clock on Application Completeness If Allowed
 - 60-90 Day Approval Shot Clock
 - Apply to Counties?

State Law Cont'd

- MICHIGAN 2012 PA 143 [ZONING](#) ENABLING ACT Amendment (EXCERPT):
125.3514 Wireless communications equipment as permitted use of property; application for special land use approval; approval or denial; authorization by local unit of government; definitions.
- (1) Wireless communications equipment is **a permitted use of property and is not subject to special land use approval or any other approval** under this act if all of the following requirements are met:
 - (a) The wireless communications equipment will be collocated on an existing wireless communications support structure or in an existing equipment compound.
 - (b) The existing wireless communications support structure or existing equipment compound is in compliance with the local unit of government's [zoning](#) ordinance or was **approved** by the appropriate [zoning](#) body or official for the local unit of government.
 - (c) The **proposed collocation will not do any of the following:**
 - (i) **Increase the overall height** of the wireless communications support structure by **more than 20 feet or 10% of its original height, whichever is greater.**
 - (ii) **Increase the width** of the wireless communications support structure by **more than the minimum necessary** to permit collocation.
 - (iii) **Increase the area of the existing equipment compound to greater than 2,500 square feet.**

State (Fed Ct) Law Cont'd

- **T-Mobile v West Bloomfield Federal 6th CA Aug 21, 2012 Opinion**
 - **Lessons learned** from this Cell Tower Denial?
 - 1. Communities must **decide early** whether to fight a proposal or not.
 - 2. Prepare your objections with **substantive expert evidence** rebutting the provider's reports and testimony up front. This can include:
 - a. Vigorous cross exam of industry experts
 - b. Presentation of experts which could include: cell tower design, city planners, coverage analysis and valuation experts
 - c. **RF emissions and other health arguments are improper under federal law.**
 - d. Don't be afraid to delay the proceedings until such work can be done and presented on the record at the City or Township level.
 - 3. **Lay testimony from residents re aesthetics is not sufficient.**
 - 4. Appeal on poor facts can result in adversely impacting a much broader group of communities.
 - 5. The result of this Opinion is that the 6th Cir has now adopted some of the more stringent rules from other circuits interpreting federal law as applied to communities including:
 - a. Denial of a single application can now constitute a violation of federal law which forbids actions preventing wireless service
 - b. Individual provider coverage gaps now constitute "significant gaps" in service.

Take Away I

What all This Means for You as Landlords: Control and Revenue

- When you receive a call or letter from the Mobile/Cellular Industry “offering” modest “bonus” to amend Current Agreements:
- You now know:
 - Industry DESPERATE to Add Antennas and Upgrade to Fiber Connections to Towers
 - Consult with Counsel
 - Renegotiate Entire Agreement
 - Demand Market Rates
 - Do NOT let tenants add regulatory functions to lease

Take Away II

What all This Means for You As Regulators

- Michigan's 2012 PA 143 Dominates Landscape
 - Local Government Foreclosed from regulating
 - 20'/10% Height Increases
 - “Reasonable” (Unlimited ?) Width Increases
 - Increases up to 2500' sq ft base
 - 14 Day Shot Clock on Application Completeness If Allowed
 - Approval Shot Clock: 60 Days for Collocation
90 Day for new

Cell Tower Update: DAS/Small Cell Siting Issues

Distributed Antenna Systems

- **What?**
 - Definition: FCC DAS Forum definition: A network of spatially separated antenna nodes connected to a common source via transport medium that provides wireless service within a geographic area or structure.
<http://transition.fcc.gov/presentations/02012012/panel-1/allen-dixon.pdf>
 - Not, but often confused with: Micro cells, Small Cells, , picocells, femtocells, temporary cells etc.
- **Where?**
 - Everywhere: Outside in Rights of Way, Public Buildings/Structures, Private Property and Inside Buildings
- **Why?**
 - **Obama Administration** Endorses Mobile as Part of National Broadband Plan
 - **Industry:**
 - **Millions of** New Antennas Needed to Cover the Nation and feed our Smart Phones and Machine to Machine Connections
 - Avg: 20-40,000 new Antennas/State
 - 70% of mobile calls originating indoors, reliable wireless
 - Data revenue up 52.6% to \$3.9B
 - AT&T 2Q2009 data revenue up 37% to \$3.4B – (108B text messages)
 - Wireless data revenue 28% of total wireless
 - Wireless data drives demand for cellular across the board

Examples of DAS Antennas



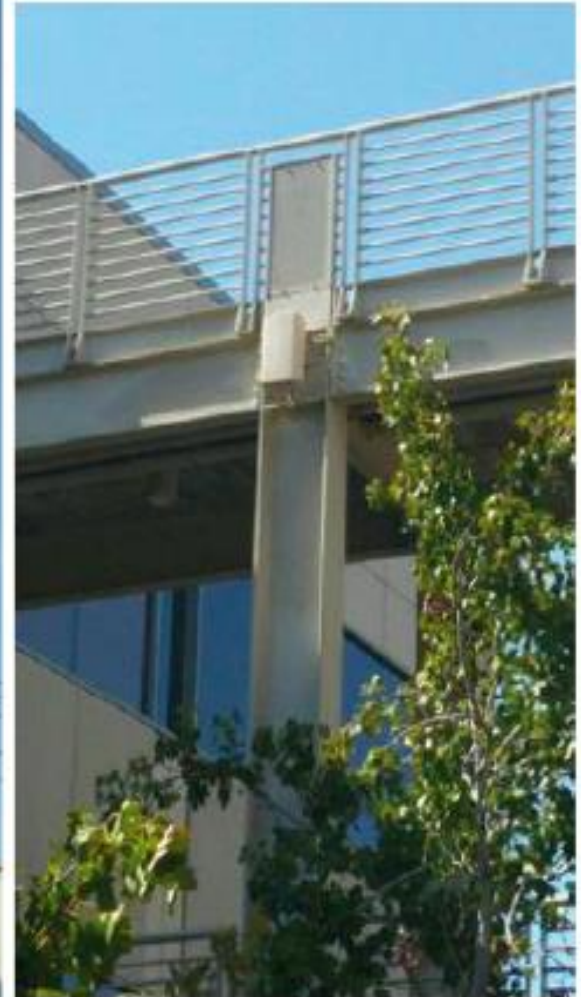
MOBILITIE 120' RT OF WAY TOWER



Examples of Current Sites



Examples of Current Sites



Sample Pole Mounted Cabinet Sizes



Enclosure attributes

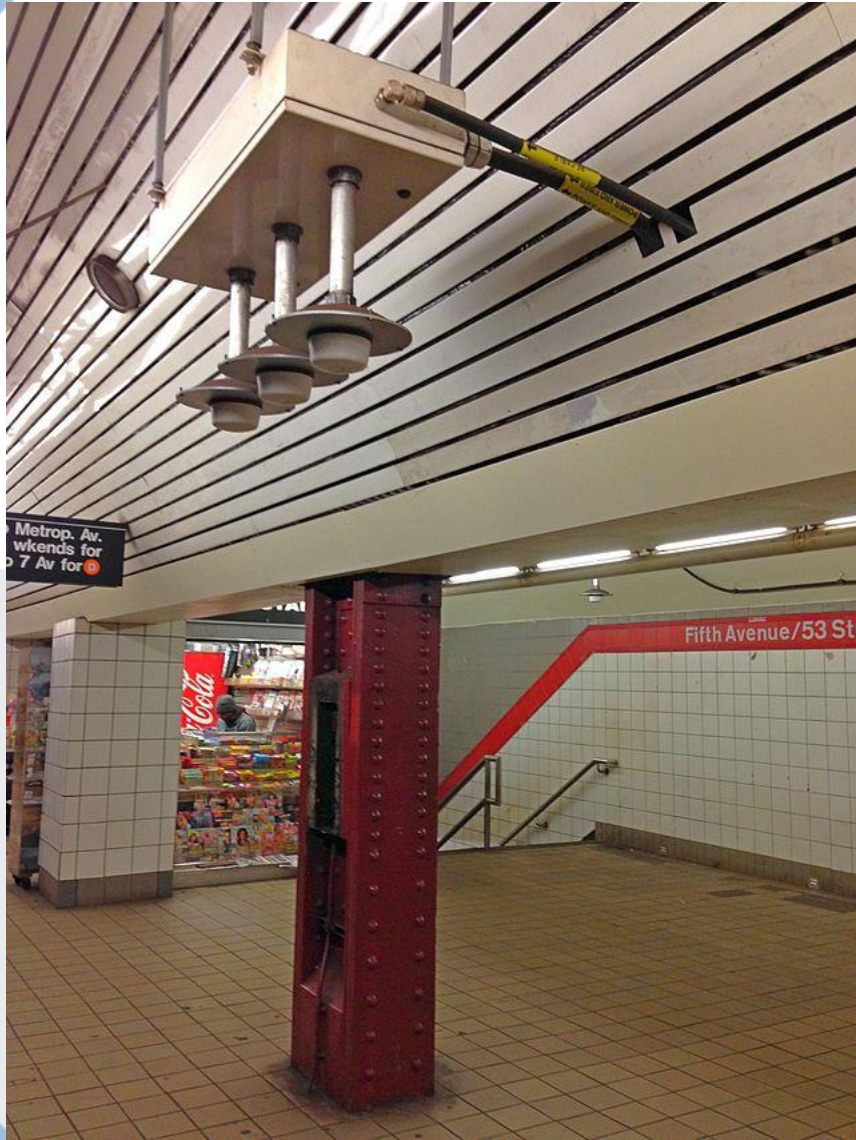
- Modular design: dual-band growth
- Flexible to accommodate different configurations: batteries, NID requirements
- Secure
- Accommodate various mounting options and access options

Examples of Current Sites



Examples of Current Sites

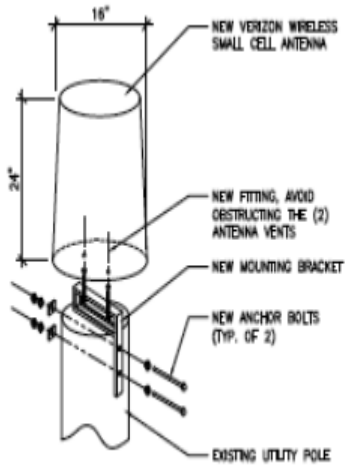




Cable Industry WiFi/Wireless



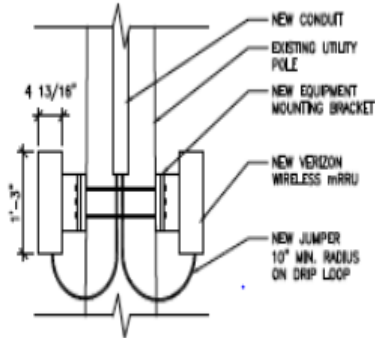
Verizon Wireless Images: Generic Sketch



ANTENNA MOUNT

22x34 SCALE 1" = 1'-0"
11x17 SCALE 1/2" = 1'-0"

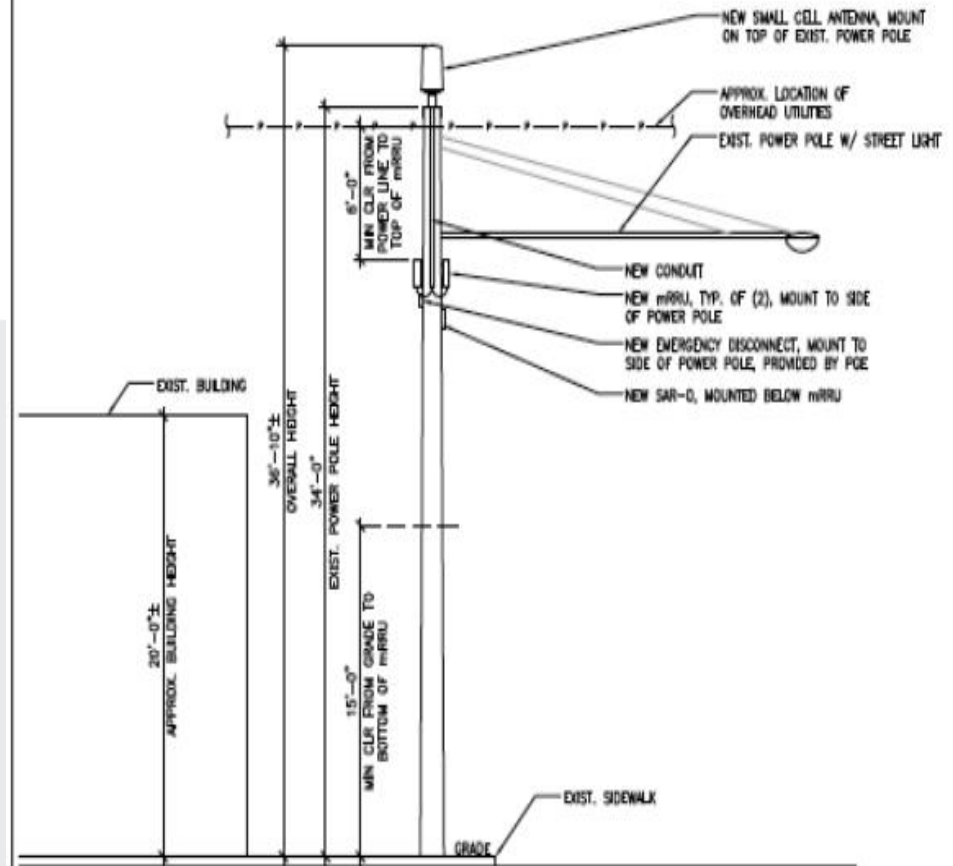
3



RRU MOUNT

22x34 SCALE 1" = 1'-0"
11x17 SCALE 1/2" = 1'-0"

4



Mobilitie: 120' Rt of Way Antenna Poles

Specs and Drawings



Utility Network Authority MI, LLC

PROJECT NUMBER:
DRAWN BY: ----
CHECKED BY: ----

IT IS A VIOLATION OF THE LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT

SITE INFORMATION
9MIX000447A
43.339536, -83.73868
N Main St & W Schlejer St
Frankenmuth, MI 48734
UTILITY POLE

SHEET TITLE
TITLE SHEET

SHEET NUMBER
0.0

9MIX000447A

43.339536, -83.73868

N Main St & W Schlejer St
Frankenmuth, MI 48734



Know what's below.
Call before you dig.

GENERAL NOTES	
THE FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OF EFFECT ON DRAINAGE; NO SANITARY SEWER SERVICE, POTABLE WATER OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED.	
SITE INFORMATION	
POLE ID:	9MIX000447A
LATITUDE:	43.339536
LONGITUDE:	-83.73868
ADDRESS/CROSS STREET:	N Main St & W Schlejer St
CITY, STATE ZIP:	Frankenmuth, MI 48734
PROPERTY OWNER	PUBLIC RIGHT-OF-WAY
APPLICANT	Utility Network Authority MI, LLC
Applicant Address	869 E Schaumburg Rd, #324 Schaumburg, IL 60194-3653
DO NOT SCALE DRAWINGS	
CONTRACTORS SHALL VERIFY ALL PLANS, EXISTING DIMENSIONS & FIELD CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ARCHITECT/ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.	



PROJECT DESCRIPTION	
END USER PROPOSES TO INSTALL A NEW 120' UTILITY POLE WITHIN AN EXISTING RIGHT-OF-WAY. THE SCOPE WILL CONSIST OF THE FOLLOWING:	
1. INSTALL PROPOSED 120' UTILITY POLE	
CODES	
2015 INTERNATIONAL BUILDING CODE 2014 NATIONAL ELECTRICAL CODE	
SHEET INDEX	
SHEET #	SHEET DESCRIPTION
0.0	TITLE SHEET
1.0	EXHIBIT PHOTO & SITE PLAN
2.0	UTILITY POLE ELEVATIONS
3.0	ELECTRICAL
ENGINEER	





Utility
Network
Authority MI,
LLC

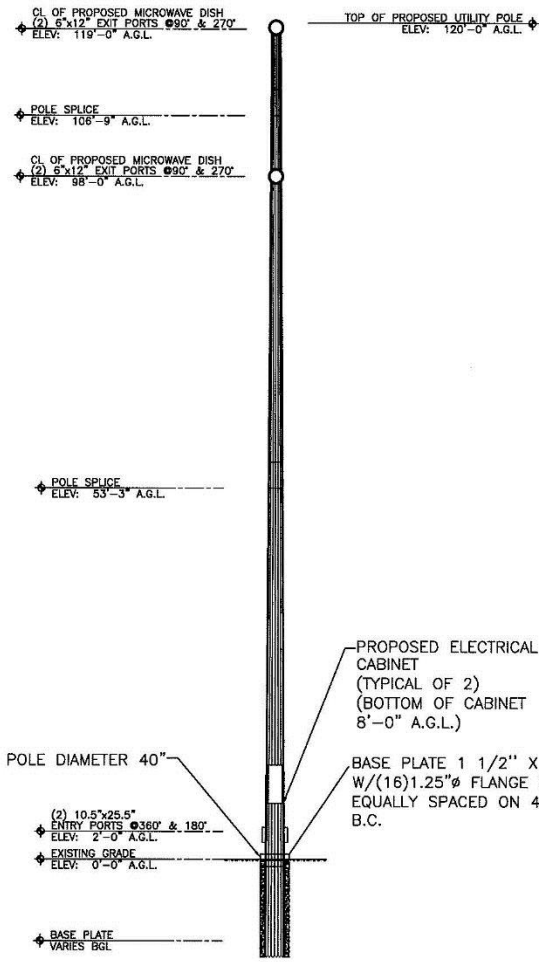
PROJECT NUMBER: _____
DRAWN BY: _____
CHECKED BY: _____

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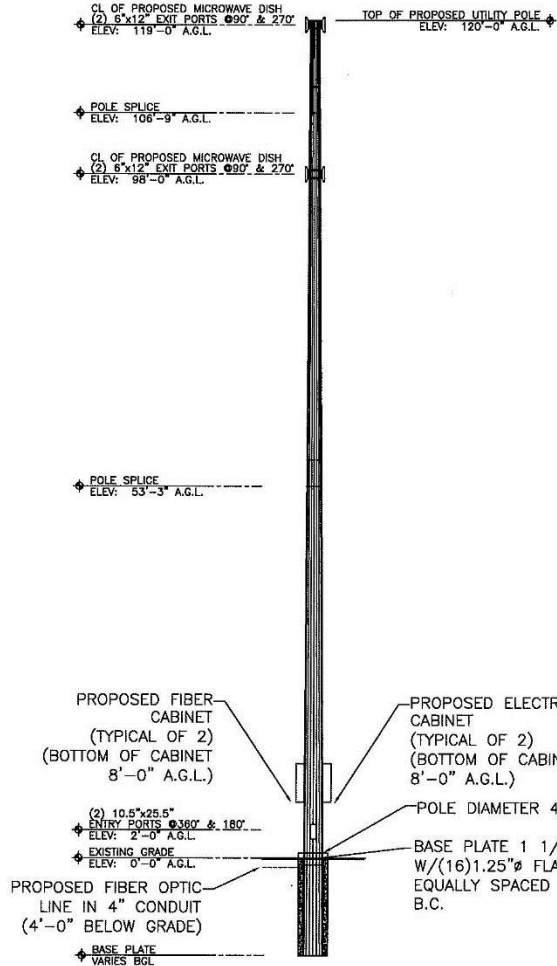
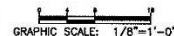
SITE INFORMATION
SMXG004474
43.365636, -83.73868
N Main St & W Scribner St
Frankenmuth, MI 48734
UTILITY POLE

SHEET TITLE
UTILITY POLE ELEVATIONS

SHEET NUMBER
2.0



1 FRONT UTILITY POLE ELEVATION
SCALE: 0.010399



1 SIDE UTILITY POLE ELEVATION
SCALE: 1/8" = 1'-0"





Utility
Network
Authority MI,
LLC

PROJECT NUMBER: _____
DRAWN BY: _____
CHECKED BY: _____

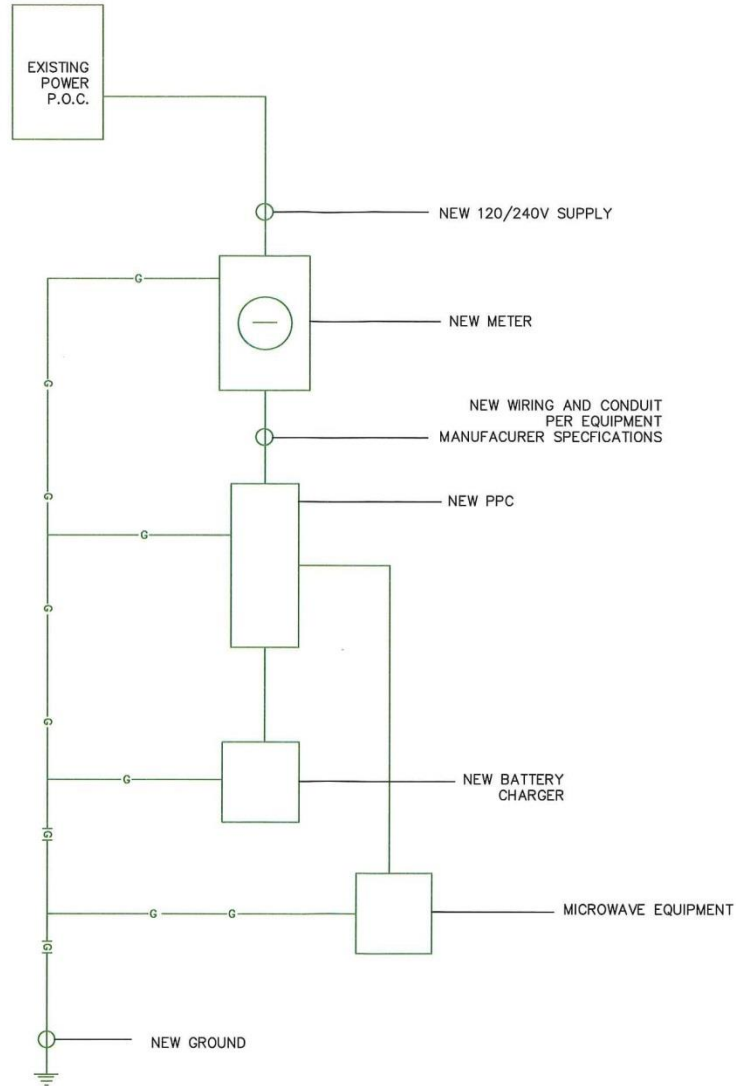


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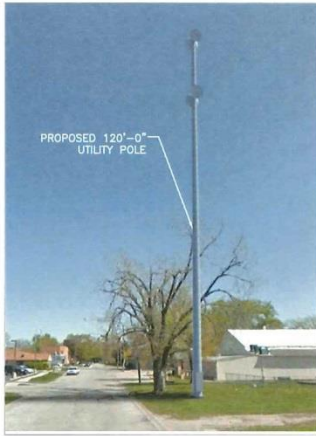
SITE INFORMATION
9MIX000447A
43.339536, -83.739668
N Main St & W Schieler St
Frankenmuth, MI 48734
UTILITY POLE

SHEET TITLE
ELECTRICAL

SHEET NUMBER
3.0



ONE LINE DIAGRAM



① EXHIBIT PHOTO – GENERIC (NOT SITE SPECIFIC)
SCALE: N.T.S.



② AERIAL SITE LOCATION
SCALE: N.T.S.



③ ENLARGED SITE PLAN
SCALE: N.T.S.

NOTE:
THIS SITE PLAN WAS GENERATED WITHOUT THE USE
OF A SURVEY. PROPERTY LINES, POWER & TELCO
UTILITY PINT CONNECTIONS/ROUTES AND EASEMENTS
SHOWN ON THESE PLANS ARE ESTIMATED.

NOTE:
PROPOSED 120'0" POLE IN THE R.O.W.
R.O.W. BOUNDARIES TO BE CONFIRMED AFTER
SURVEY



Utility
Network
Authority MI,
LLC

PROJECT NUMBER: _____
DRAWN BY: _____
CHECKED BY: _____

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ENGINEER, TO ALTER THIS DOCUMENT

SITE INFORMATION
9MIX000447A
43.399536, -83.73868
N Main St & W Schlier St
Frankenmuth, MI 48734
UTILITY POLE

SUBJECT TITLE
EXHIBIT PHOTO &
ENLARGED SITE PLAN

SHEET NUMBER
1.0

Federal Rules for DAS

FCC Acceleration of Broadband by Wireless Report and Order Dated October 17, 2014, Released October 21, 2014

See Tab 1

The FCC Essentials:

1. The FCC says Locals retain proprietary Interests = Franchising fees (Revenue) and Regulation
2. But it also says - Approval of One May = Approval of More:
 - Future Collocators may be able to add as much as 10 feet vertical and 6 feet horizontal and more ground eqpt.
3. Historical District Changes August 2016

Federal Statutes for DAS

- **Telecommunications Act [47 U.S.C. § 332(c)(7)]**
 - Applies to all applications for “personal wireless services facilities”
 - Generally preserves local authority to control placement of person wireless facilities, subject to certain substantive and procedural limits
- **Telecommunications Act [47 U.S.C. § 253]**
 - Preempts local/state regulations that prohibit or have effect of prohibiting ability of any entity to provide telecom services
 - But does not reach nondiscriminatory RoW management or compensation requirements
- **Middle Class Tax Relief Act [47 U.S.C. § 1455(a)]**
 - Applies to all “wireless” applications (broader)
 - Preempts local discretion over certain collocations and modifications to existing wireless sites (This slide and 31 courtesy of BBK PP)

Putting Federal Time Frames Together...

(But remember State Law Time Frames)



The FCC and Mobilitie

- MML, PROTEC, MTA, CRA, GVMC & MONROE
- 729 filings
- View Filing at:

https://ecfsapi.fcc.gov/file/1030998488645/COMMENTS_SMART%20COMMUNITIES%20SITING%20COALITION.pdf

- STREAMLINING DEPLOYMENT)
OF SMALL CELL INFRASTRUCTURE)
BY IMPROVING WIRELESS FACILITIES) WT Docket No. 16-421
SITING POLICIES;)
)
MOBILITIE, LLC)
PETITION FOR DECLARATORY RULING)
_____)

COMMENTS OF SMART COMMUNITIES SITING COALITION

Michigan DAS/Small Cell Siting

The Rules

- Michigan Const Art 7 Sec 29

No...corporation...operating a public utility shall have the right to the use of the highways, streets, alleys or other public places of any county, township, city or village for wires, poles, pipes, tracks, conduits or other utility facilities, without the consent of the duly constituted authority of the county, township, city or village; or to transact local business therein without first obtaining a franchise from the township, city or village. Except as otherwise provided in this constitution the right of all counties, townships, cities and villages to the reasonable control of their highways, streets, alleys and public places is hereby reserved to such local units of government.

- Michigan Metro Act

- Metro Authority Determination #1
 - Purports to bring DAS under the Metro act BUT: Preempted by express language of the Act – which only applies to “lines”.
 - September 2016 – Local Community Stabilization Authority – prodded by PROTEC, relegated all Metro Act Determinations as “Historical Only” – Not binding upon LCSA
 - So – A shift in our favor should lead to better franchise terms

- 2012 PA 143; MCL 125.3514 Michigan Zoning Act

- Only applies to your regulator role - probably

- October 2014 FCC Regulation

Metro Act and Determination No. 1

- **Metro Act and Determination No. 1** – Distributed Antennae Network Systems June 2, 2004:
- **Metro Act: MCL 484.3102(j) Nov 1, 2002: (j)**
“**Telecommunication facilities**” or “**facilities**” means...copper and fiber cables, lines, wires, switches, conduits, pipes, and sheaths...which...provide telecommunication services or signals. Telecommunication facilities or facilities **do not include antennas, supporting structures for antennas, equipment shelters....**
- **Determination #1 June 2, 2004:** “Distributed antennae networks providing telecommunication services through existing or new cable facilities within the public right-of-way are considered telecommunication facilities under Section 2(j) of the METRO Act; and are, consequently, subject to the provisions of the Act. All other local ordinances, laws, and regulations not specifically pre-empted by the Act shall remain in force. “
- Historical Reference Only

2012 PA 143;MCL 125.3514

New Cell Towers and Collocation

- Objected to by PROTEC, MML and MTA
- Passed/Effective May 24, 2012
- Should not apply to Govt Property–Rts of Way
- Local Government Foreclosed from regulating
 - 20'/10% Height Increases
 - Unlimited Width Increases
 - Increases up to 2500 sq ft base
 - 14 Day Shot Clock on Application Completeness If Allowed
 - 60-90 Day Approval Shot Clock

2012 PA 143

- MICHIGAN 2012 PA 143 **ZONING** ENABLING ACT Amendment (EXCERPT):
125.3514 Wireless communications equipment as permitted use of property; application for special land use approval; approval or denial; authorization by local unit of government; definitions.
- (1) Wireless communications equipment is **a permitted use of property and is not subject to special land use approval or any other approval** under this act if all of the following requirements are met:
 - (a) The wireless communications equipment will be collocated on an existing wireless communications support structure or in an existing equipment compound.
 - (b) The existing wireless communications support structure or existing equipment compound is in compliance with the local unit of government's **zoning** ordinance or was **approved** by the appropriate **zoning** body or official for the local unit of government.
 - (c) The **proposed collocation will not do any of the following:**
 - (i) **Increase the overall height** of the wireless communications support structure by **more than 20 feet or 10% of its original height, whichever is greater.**
 - (ii) **Increase the width** of the wireless communications support structure by **more than the minimum necessary** to permit collocation.
 - (iii) **Increase the area of the existing equipment compound to greater than 2,500 square feet.**

How to approach a DAS Application seeking Rt of Way access submitted under the Metro Act?

1. Respond to the Metro Act App re Lines
 - a) Modified Metro Act Permit
2. Respond to the Antennas Etc., Per the FCC
 - a) Franchise/License/Lease with careful language re fees and limited permission

Priorities?

1. Safety of the Motoring Public
2. Use Pvt Land Off Rt of Way
 - Collocate
 - New Structures
3. Rt of Way
 - Collocate - Electric (CTIA Article See Tab 4)
 - New Structures – 1 telecom/wireless pole
 - 1st come 1st serve
 - Same answer as in the Electric build out 100 years ago (Historical references)
 - Consider Requiring More Stealth/Concealment
 - Consider Designating Official to Manage Applications
 - Decide Whether Zoning Requirements Apply To ROW

Key Questions

- Can I say “NO”.
 - Probably, for now, but don’t push that too hard
- Is Wireless a utility? Maybe
 - Yes MCL 460.111(c)
 - No MCL 484.2102(ff),
 - Wireless not telecom MCL 484.3102(j-k)
- Who am I dealing with? Provider or infrastructure installer?
 - Probably just an installer (but the provider is in the not too distant background and needs a franchise as well)
- Its my property
 - But No Moratoriums - FCC

Points of Interest for Local Govt

- Const art 7 sec 29
- Metro Determination #1 relegated to the trash heap
- FCC 2014 Report and Order Savings for Locals
 - Proprietary interests preserved
 - Zoning preserved
 - Local Siting preferences ok
- St. Clair Shores lawsuit – settled – no new poles
- Genesee Co Rd Comm lawsuit
- SB 399 Co Rd Comm's
- SB 995 Autonomous Vehicles
- Historical District issues FCC rule change – Drawing the circle smaller
- Mobilitie FCC DAS/Small Cell Petition
- Congress and State Legislatures Activity
- Cable WiFi Equipment
- New FCC
- Coordination with Counties
- Goals: find that in between space that enables some reasonable control and avoids new legislation/litigation

PROTEC
www.protec-mi.org

Who We Are, And What We Do

The Michigan Coalition To Protect Public Rights-Of-Way was formed in 1996 by several Michigan cities interested in protecting their citizens' control over public rights-of-way, and their right to receive fair compensation from the telecommunications companies that use public property.

Industries we deal with in our Rts of Way work include Telecommunications (Wireline, wireless and video/cable), Electric (Distribution and Transmission), Pipelines, as well as Municipal Water and Sewerage

Where We Appear Governmental Bodies we work with include the Federal and State Courts, FCC, NTIA, US DOT, PHSMA, MPSC, Metro Authority (Now the Local Community Stabilization Authority) and the Michigan Legislature and Congress

50+ Members include Municipalities Across Michigan

<http://www.protec-mi.org/supporters.php>

Our 2014/15 Annual Report

<http://www.protec-mi.org/media/2014-annual-report.pdf>

Michael J. Watza Biography

**Martindale Hubbell AV Rating
Super Lawyer Designation
Detroit Business Top Lawyer**



- Michael J. Watza is Co-Chair of the Governmental and Commercial Litigation Practice Groups at Kitch, a full service Law firm based in Detroit, with offices in Lansing, Marquette, Mt. Clemens, Chicago, Ill. and Toledo, OH.
- Mr. Watza's practice provides litigated, legislative and regulatory solutions on behalf of municipal, health care and private sector clients concerning legislation, Complex Litigation, Governance Issues, Telecommunications including Cable and Cell Towers, Energy and Insurance.
- Michael has managed multiple legislative initiatives, represented clients in State and Federal trial and appellate courts across Michigan as well as attended to regulatory matters before the Michigan Public Service Commission, Michigan Tax Tribunal, Department of Labor and Economic Growth and the Federal Communications Commission and Department of Transportation (PHSMA).
- Michael has represented clients in the halls of the Michigan Legislature and Congress through negotiation, drafting and testimony regarding legislation on various issues including energy, transmission line siting, telecommunications (cable and cell towers), pipeline regulation, the formation of inter-governmental authorities and tort reform.
- Michael also serves as General Counsel to PROTEC and the Mobile Technology Association of Michigan, the Michigan Gaming Control Board, Covenant House Central School Board in Detroit, Chairman of the Novi EDC, Chairman of Attorney Grievance Commission Grievance Panel #9, Immediate Past Chairman of the Administrative Law Section of the State Bar and Treasurer/Secretary of the Public Corporation Law Section of the State Bar and Chairman of the International Municipal Lawyers Technology Committee.
- Michael is an adjunct faculty member at Michigan State University College of Law having taught Communications Law and Policy and Ethics and the Practice of Law.
- In 2008, Michael successfully led a coalition of Michigan Cities to Federal Court and Congress to oppose Comcast's effort to move PEG channels to the 900 channel range and digital, at a time when all other cable channels were analog.
- In 2013, Michael provided the legal components to the development of the 1st new Municipal Fiber to the Home and Business (FTTP) project and the development of a DDA sponsored WIFI system in Michigan in the face of legislative impediments

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