

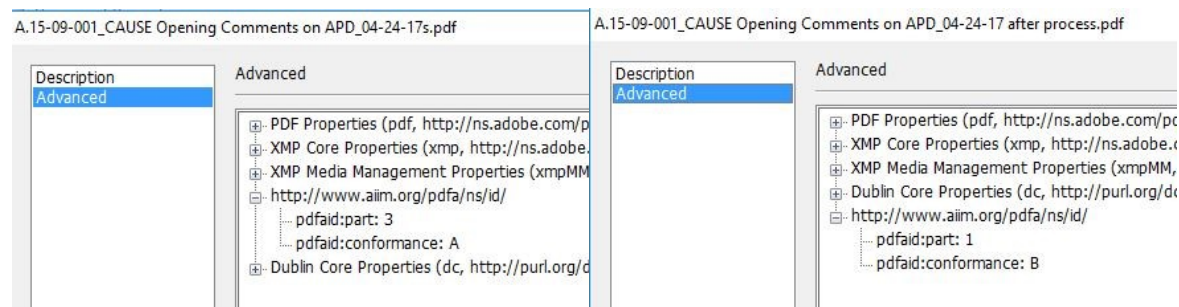
## STATEMENT REGARDING PDF/A COMPLIANCE OF TRANS. 107559.

Mr. Lau -

**FILED**

4-24-17  
04:59 PM

As instructed, I have processed the previously filed document using the link to Neevia.com, the software you prescribed, which returned the document with the following changes in its metadata.



As you can see, Neevia converted a PDF/A-3a-compliant document into one that complies with PDF/A-1:2005 at the “b” conformance level, which is not accessible to the disabled. I did not immediately notice visible differences to the text and features. This is because, based on prior rejections, I have made charts and tables images, instead of objects. Unfortunately, this limits the ability of readers to manipulate and test numerical content, which should be an important feature in regulatory filings. More seriously, the downgraded document lacks tags that establish structure and reading order, which are now indecipherable to screen readers used by the disabled. Therefore,

I submit this under protest, believing that the condition violates the ADA, the Unruh Act, and the values of this Commission. (I have performed the same downgrading function on the certificate of service and this attachment.)

/s/ Scott Rafferty, May 10, 2017