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BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
DOCUMENT CONTROL

IN THE MATTER OF U S WEST )  
COMMUNICATIONS, INC.'S )  
COMPLIANCE WITH SECTION 271 OF THE ) DOCKET NO. T-00000A-97-238  
TELECOMMUNICATIONS ACT OF 1996 )  
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MCI WORLDCOM'S SUPPLEMENTAL COMMENTS ADDRESSING U S WEST'S PERFORMANCE INDICATORS, EXHIBIT B

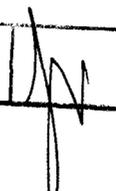
In accordance with the instructions provided at the workshop held on October 20-21, 1999, MCI WorldCom, Inc. ("MCIW"), on behalf of its regulated subsidiaries, submit these supplemental comments addressing U S WEST's performance indicators, Exhibit B, which were distributed at the workshop held October 20, 1999. These supplemental comments were also sent by e-mail to the parties attending the workshop on September 29, 1999.

Dated: November 3, 1999

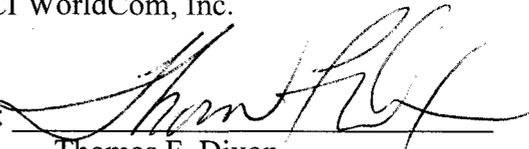
Arizona Corporation Commission

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**MCI WORLDCOM 'S COMMENTS ON  
U S WEST'S SERVICE PERFORMANCE INDICATORS  
U S WEST'S EXHIBIT B**

**GENERAL COMMENTS:**

All of the proposed indicators included in U S West's Exhibit B lack a measure of success (i.e., parity or benchmark standard). A measure of success is required before an evaluation about the performance of U S West can be made. Moreover, it is mandatory that each indicator have a measure of success finalized before the OSS Test commence.

In this document MCIW does not provide detailed comments on the service group disaggregation since U S West committed to update the service group disaggregation in the last workshop. MCIW is prepared to provide comments on the next U S West proposal for service group disaggregation once it is submitted.

Generally, based on what was provided in Exhibit B there is significantly more disaggregation by service group for resale than for UNEs. UNE loop should be disaggregated by loop type. There should be disaggregation for UNE xDSL loops, as well as for resale xDSL. Unbundled Dedicated Transport should be disaggregated by speeds – DS-1 and DS-3. Unbundled switching should be split out by port type. This should apply to all of the measures where reporting by service group type is important.

The indicators beginning on page B-35 through page B-57 should not merely be diagnostic, but rather should be included in the OSS Test. Once in production, these measures should have a penalty incentive associated with them.

**DETAILED COMMENTS:**

**Indicator Number: GA-1**

This measure and GA-2 only capture gateway availability for the IMA and EDI interfaces. All interfaces available to CLECs including EB – TA and EXACT should be measured.

Standard can be a benchmark unless a system is available to U S West retail, in which case its availability should be measured at parity.

The availability of systems CLECs access is 6am to 8pm Monday through Friday. This is not at parity to the availability of U S West's systems. The hours of availability should be equivalent or very close to those retail systems and should include weekends.

**Indicator Number: GA-2**

Same comments as in GA-1. In addition, for computer to computer interfaces system availability should include all hours except those truly needed for system maintenance. Note: the measure as proposed by U S West already excludes scheduled system downtime.

**Indicator Number: PO-1**

The list of pre-order transaction types is not complete and should include "Rejected/Failed Inquiries", and Loop Qualification if that query type is available uniquely.

Results should be disaggregated by CLEC if possible.

If the EXACT system has pre-order capabilities it should be measured.

If U S West has manual processes, especially where it has manual only processes, e.g., loop qualification, these should be measured.

**Indicator Number: OP-1**

If U S West ever adds additional queues, a result for each queue needs to be measured separately.

**Indicator Number: OP-2**

The threshold of 20 seconds is a retail standard. Given that the contact time on CLEC calls may be shorter than for retail (the retail rep is usually taking an order), the standard for speed to answer should be shorter.

The proposed standard should be supported by historical data before it is accepted.

**Indicator Number: OP-3**

In the description it states that the “Original due date matched by completion date is counted as met.” Orders with a subsequent due date should also be measured. For example, if U S West agrees to a new install date and misses it, it should be counted in the measure as a miss.

In the description it states that “a due date missed for standard categories of customer reasons is counted as met.” Even though U S West counts this way on its retail side they should not be counted as met.

In the description there is an exception for orders “with extended due dates assigned in conjunction with a lack of facilities”. (This implies that if U S West is without facilities, it can unilaterally offer the CLEC an extended due date. Despite the fact that U S West committed to a due date, albeit an extended one, it excludes the order from this measure.) This is not a valid exception.

In the description, it shows that for non-designed services, results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Formula should be redefined so that end time is when the completion notice is sent to CLEC, not when the order is noted as complete in U S West’s provisioning system.

Indicator DNP-1 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-3.

**Indicator Number: OP-4**

In the description, it shows that for non-designed services, results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Partial days should not be rounded to the nearest full day. (The formula indicates U S West is able to measure not only date but also time.) Partial days should be reported as such.

Indicator DNP-2 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-4.

Excluded are “orders with customer requested due dates greater than the current standard interval and intervals lengthened due to CLEC – and CLEC’s customer-caused delays.” In order to be consistent, orders with due dates shorter than the standard interval should also be excluded. e.g., if the ILEC and CLEC have different percentage of orders that are expedited, the results may be skewed.

**Indicator Number: OP-5**

In the description, it shows that for non-designed services, results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Indicator DNR-3 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-5.

The 2<sup>nd</sup> bullet under description states that the report is measuring all trouble reports “resolved” within the reporting period, it should be all trouble reports “received.”

There is an inconsistency between the description of measure and the formula. The description states that all trouble reports are counted for the 30-day period after installation. The formula states that “new installation related trouble reports.” Any customer trouble reported during the 30-day period should be counted.

The formula and the measure are inconsistent. The formula is trying to derive the percent orders completed accurately by assuming one customer trouble is equivalent to one incorrect order. In actuality, there could be multiple troubles on one order. e.g., if there were 100 new orders and 2 of the orders experienced a total of 6 troubles, the actual accuracy rate would be 98% but the way this measure is calculated it would only show an accuracy rate of 94%.

This measure only captures troubles experienced after order completion. A true order accuracy measure would have to include troubles identified during the provisioning process.

**Indicator Number: OP-6**

This indicator is useful, but there is also a need to measure delayed days for pending orders (those not yet complete.)

In the description, it shows that for non-designed services, results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for designed services and unbundled loops is by density area. Since U S West knows in advance of committing to a due date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Indicator DNP-3 demonstrates that U S West measures its performance on behalf of itself for the provision of interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator OP-6.

Excluded are orders delayed due to customer reasons. It should be clear that subsequent orders (orders with a new due date) are not excluded just because the CLECs’ customer may have caused the original due date to be missed.

Unbundled loop orders held for lack of facilities should not be excluded.

Delay interval should be redefined to include the time when the CLEC is finally notified of order completion.

**Indicator Number: OP-7**

The service level disaggregation only includes loops with and without NP. There are other services where a coordinated cutover is required and these should be measured as well. e.g., U S West is currently providing service to a customer and the CLEC wins the customer and is able to provide the service without using any U S West facilities. Another example is standalone LNP for a service type for which a 10-digit trigger cannot be set – PBX service in a DMS 100 switch.

While CLEC or customer caused delays or changes in cutover time are excluded, it is important that it be clear how this is determined.

While the Commission has asked that parties endeavor to use a parity standard, the only like process is when U S West takes back a loop. Other than that, the measure of success should be a benchmark. 5 minutes has been used in other states.

The exclusion should be rewritten to say, “Customer caused delays during the cutover process only”, since changes in the cutover time should not be excluded because this measure is capturing the time for a work activity during cutover not whether the cutover occurred at the agreed to time.

**Indicator Number: OP-8**

Presuming that the CLEC asked to have a 10 digit trigger set via an LSR, does U S West have the system capability to automatically send an order to have the 10 digit trigger set on the line? If the system does it, the value in measuring this is somewhat less than if a person has to actually create and send this 10-digit trigger order.

Excluded are orders delayed due to customer reasons. It should be clear that subsequent orders (orders with a new due date) are not excluded just because the CLECs’ customer may have caused the original due date to be missed.

The first part of the exclusion is unnecessary since a customer caused delay has no impact on the 10-digit trigger process. The second part of the exclusion should be clarified to say, “customer caused changes to advance the cutover times.”

**Indicator Number: OP-9**

Excluded are orders delayed due to customer reasons. It should be clear that subsequent orders (orders with a new due date) are not excluded just because the CLECs’ customer may have caused the original due date to be missed.

**Indicator Number: MR-1**

**Indicator Number: MR-2**

The threshold of 20 seconds is high. This number it should be supported by historical data before it is accepted.

**Indicator Number: MR-3**

In the description, it shows that results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for unbundled loops is by density area. Since U S West knows in advance of committing to a maintenance repair date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

MCIW reserves comment on the service group types since U S West is revising its proposal. However, this measure should not include complex business services such as Centrex and PBX just because U S West may have been able to provision them using non-designed circuits. Additionally, 24-outage interval is far too long for anything but Basic POTS, especially for higher speed data service such as ISDN.

**Indicator Number: MR-4**

In the description, it shows that results will be disaggregated by “dispatches within MSAs”, “dispatches outside MSA”, and “no dispatches”. The disaggregation for unbundled loops is by density area. Since U S West knows in advance of committing to a maintenance repair date how its processes are designed, it is unclear why this level of disaggregation is necessary. Are there other processes that could be a factor?

Same comments as in MR-3 with respect to service group types except this interval is even more unacceptable.

**Indicator Number: MR-5**

Under the “purpose”, it includes “4 hours” as a possible standard. 4 hours may be high for DS-1 and DS-3 services.

All complex business services including Centrex, PBX trunks and ISDN should be included in this measure only, and not in MR-4.

Indicator DNR-2 demonstrates that U S West measures its performance on behalf of itself for maintenance on interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator MR-5.

**Indicator Number: MR-6**

End time for this measure should be redefined to close time to the CLEC instead of clear time.

“Test OK” and “Found OK” should not be excluded from this measure.

MCIW reserves comment on the service group types since U S West is revising its proposal.

Indicator DNR-1 demonstrates that U S West measures its performance on behalf of itself for maintenance on interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator MR-6.

**Indicator Number: MR-7**

“Test OK” and “Found OK” should not be excluded from this measure.

MCIW reserves comment on the service group types since U S West is revising its proposal.

**Indicator Number: MR-8**

“Test OK” and “Found OK” should not be excluded from this measure.

MCIW reserves comment on the service group types since U S West is revising its proposal.

Indicator DNR-4 demonstrates that U S West measures its performance on behalf of itself for maintenance on interconnection trunks. Instead of being a separate measure, this indicator should be used as the parity standard for “LIS trunks” in indicator MR-8.

**Indicator Number: MR-9**

“Test OK” and “Found OK” should not be excluded from this measure.

MCIW reserves comment on the service group types since U S West is revising its proposal.

Formula numerator should be changed to read, “Total maintenance reports completed by commitment date and time.”

**Indicator Number: BI-1**

Change measure description from "ready to be transmitted" to "transmitted". The description of the measure would then be consistent with the formula.

Report measure by individual CLEC as well as CLEC aggregate

Results for this indicator should be disaggregated by type of billing record, for example – Resale, UNEs, and switched access.

While the Commission has asked that parties endeavor to use a parity standard, this is possible for resale (compare it to retail) and UNEs (also compare it to retail), it is not possible for switched access. Suggest a benchmark of 95% in 5 days.

**Indicator Number: BI-2**

Under “purpose”, it states that this indicator only applies to bills U S West delivers via EDI format. What if U S West and CLECs use other interfaces? Also, if U S West uses something other than EDI format internally, measure of success may have to be a benchmark

Results for this measure should be reported by individual CLEC as well as CLEC aggregate.

Results for this indicator should be disaggregated by type of billing, for example – Resale, UNEs, and Facility/Interconnection.

While the Commission has asked that parties endeavor to use a parity standard, this may not be possible for this measure since the like process for U S West is not that similar or it just too difficult for U S West to measure. Suggest a benchmark of 99% within 10 days.

**Indicator Number: BI-3**

Results for this indicator should be disaggregated by type of billing, for example – Resale, UNEs, and Facility/Interconnection.

While the Commission has asked that parties endeavor to use a parity standard, this is possible for resale (compare it to retail) and UNEs (also compare it to retail), but may not be possible for Facilities/Interconnection. Suggest a benchmark of 95%.

The billing indicators lack of a measure of “Usage Completeness”. This indicator would inform parties about the percentage of usage charges appearing on the correct bill.

**Indicator Number: ES-1**

In the description it states that “CLEC-specific results are not available.” As much as possible, U S West should be required to break out results by CLEC.

It is not clear from the category "Reporting Comparison" that U S West Retail results will be reported separately from CLEC results. If all ALI update results are reported as a combined number, then there is

no way to determine if service to CLECs is the same as that U S West provides for itself. Even if reporting is not available for individual CLECs, this measure should at least be reporting separately for U S West Retail and the CLECs in the aggregate.

If U S West provides direct gateway access to 911 database, (i.e., without CLEC being tied to the service order), it should be measured as a separate level of disaggregation.

**Indicator Number: ES-2**

Results should be reported for individual CLECs as well as the aggregate of all CLECs  
There is no real reason to capture date and time in formula if measure is only being reported in business days.

Measuring the timeliness of installation of 911 service trunks as a separate indicator is fine. In some states, this is just a level of disaggregation in the provisioning measure.

**Indicator Number: DA-1**

This indicator will only be measured when the CLEC has special trunk arrangements and separate operators.

**Indicator Number: DA-2**

This indicator will only be measured when the CLEC has special trunk arrangements and separate operators.

**Indicator Number: OS-1**

This indicator will only be measured when the CLEC has special trunk arrangements and separate operators.

**Indicator Number: OS-2**

This indicator will only be measured when the CLEC has special trunk arrangements and separate operators.

**Indicator Number: NI-1**

**Indicator Number: NI-2**

While the Commission has asked that parties endeavor to use a parity standard, this is not possible for common trunks, since they are by definition shared by both CLECs and U S West. Suggest a benchmark of no more than 2% of trunk group blocking at no more than 2%.

**Indicator Number: CP-1**

In the "purpose", it states that the "Original due date matched by completion date is counted as a met due date." Orders with a subsequent due date should also be measured. For example, if U S West agrees to a new install date and misses it, it should be counted in the measure as a miss. The numerator in the formula should be changed to "Total orders completed on Committed Due Date".

In the description it states that "a due date missed for standard categories of customer reasons is counted as met." These should not be counted as met. Does U S West count this way on its retail side as well?

All types of collocation should be included, not just physical and virtual. Results for augmented, cageless and shared collocation should be measured uniquely.

**Indicator Number: CP-2**

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

**Indicator Number: DPO-1**

This indicator should include not only percentage of orders that flow through compared to everything sent electronically, but also the number of orders that flow through by service group type and order type as a percentage of those that are programmed to flow through.

**Indicator Number: DPO-2**

Under "purpose", it indicates that the measure will apply to electronic LSRs Results for manual LSRs need to be measured as well.

Under "description", it states that the interval is in "business days". This is unacceptable, as this is usually a process that happens in minutes or hours. This measure should be evaluated in hours or fractions of hours.

There is no disaggregation between orders sent electronically and handled electronically and those sent electronically and handled manually. The benchmarks for these two processes should be different with the one for the fully electronic LSRS significantly shorter.

**Indicator Number: DPO-3**

Measure to be deleted.**Indicator Number: DPO-4**

The FOC Interval indicator is one of the most important measures and in no way should be merely diagnostic.

There does not appear to be any disaggregation by service group type. This level of disaggregation is important, as the notification interval will often vary based on the complexity of the service.

The measure of success for this indicator is extremely important, and if it is a benchmark must be set in recognition of the fact that U S West receives a FOC almost instantaneously.

Basic unit of measure should be hours, not days. For measurement of fully electronic FOCs, measurement should be based on system availability hours and for FOCs requiring manually processing, business hours (hours of operation of Interconnection Provisioning Center) should be used.

**Indicator Number: DPO-5**

This indicator should be used as the parity comparison for indicator PO-1.

**Indicator Number: DPO-6**

If U S West has a fully electronic process, the standard of 24 hours is significantly too long. If U S West does not have a fully electronic process for sending completion notices, it should be required to develop one.

This measure assesses a critical activity in the ordering/provisioning processes and should not be diagnostic, rather be assessed as core measurement.

**Indicator Number: DPO-7**

Same comments as for DPO-6.

**Indicator Number: DOP-1**

This indicator is focused on the CLECs, and is unnecessary for a test of U S West's OSS. It is also unnecessary once the indicators are in production.

**Indicator Number: DOP-2**

This indicator is really a sub-measure of OP-6.

**Indicator Number: DOP-3**

This indicator is really a sub-measure of OP-6.

**Indicator Number: DMR-1**

This indicator is focused on the CLECs, and is unnecessary for a test of U S West's OSS. It is also unnecessary once the indicators are in production.

"Test ok" troubles should not be included in this measure.

**Indicator Number: DCP-1**

This indicator is focused on the CLECs, and is unnecessary for a test of U S West's OSS. It is also unnecessary once the indicators are in production.

This measure should not be diagnostic as it measures a critical activity in the provisioning of collocation arrangements.

**Indicator Number: DCP-2**

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

This measure should not be diagnostic as it measures a critical activity in the provisioning of collocation arrangements.

**Indicator Number: DCP-3**

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

This measure should not be diagnostic as it measures a critical activity in the provisioning of collocation arrangements.

**Indicator Number: DCP-4**

All types of collocation should be included, not just physical and virtual. Results for augments, cageless and shared collocation should be measured uniquely.

This measure should not be diagnostic as it measures a critical activity in the provisioning of collocation arrangements.

**Indicator Number: DNI-1**

The usefulness of this indicator in an OSS Test is unclear. This measure, as designed, assesses the efficiency of the CLEC's usage of its interconnection trunking facilities, not the performance of U S West in making trunking facilities available to CLECs.

**Indicator Number: DNP-1**

This indicator should be used as the parity comparison for indicator OP-3.

**Indicator Number: DNP-2**

This indicator should be used as the parity comparison for indicator OP-4.

**Indicator Number: DNP-3**

This indicator should be used as the parity comparison for indicator OP-6.

**Indicator Number: DNR-1**

This indicator should be used as the parity comparison for indicator MR-6.

**Indicator Number: DNR-2**

This indicator should be used as the parity comparison for indicator MR-5.

**Indicator Number: DNR-3**

This indicator should be used as the parity comparison for indicator OP-5.

**Indicator Number: DNR-4**

This indicator should be used as the parity comparison for indicator MR-8.

CERTIFICATE OF SERVICE

I hereby certify that on this 3<sup>rd</sup> day of November , 1999, the Original and ten copies of MCI WorldCom, Inc.'s Supplemental Comments Addressing US West's Performance Indicators, Exhibit B in Docket No.T-00000B-97-0238 were Hand served to the Arizona Corporation Commission.

In addition, a true and correct copy was sent via United States First Class Mail to the following:

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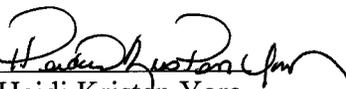
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