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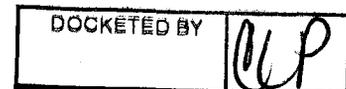
November 20, 2001

**VIA HAND DELIVERY**

Chairman William Mundell  
Commissioner Jim Irvin  
Commissioner Marc Spitzer  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Arizona Corporation Commission  
**DOCKETED**

NOV 20 2001



Re: *Requested Modification to Proposed Slamming/Cramming Rules ("Proposed Rules"); Docket No. RT 0000J-99-0034; November 27-28, 2001 Open Meeting*

Dear Commissioners:

On behalf of Verizon Wireless, we request that you modify the Proposed Rules on slamming and cramming to exempt wireless carriers, consistent with applicable statutory authority. Verizon Wireless previously pointed out the absence of jurisdiction over wireless in comments filed earlier in this proceeding on June 7 and August 6, 2001. For convenience, a copy of those comments are attached.

The Proposed Rules have been recommended by Staff pursuant to a 1999 legislative authorization. A.R.S. § 44-1571 *et seq.* In enacting these statutes, however, the legislature made it clear that these provisions – and any resulting Commission rule-making authority – do not extend to wireless carriers. These statutory provisions apply only to “long-distance” and “local” telecommunications service providers, which are defined expressly to exclude providers of “wireless, cellular, personal communications or commercial radio services.” A.R.S. §§ 44-1571.3 and 44-1571.4. The Proposed Rules at R14-2-2003 completely fail to recognize this exclusion with respect to “cramming,” and condition the wireless slamming exclusion in R14-2-1903 on wireless providers’ continuing exemption from federal equal access obligations. Thus, in their current form, the Proposed Rules exceed the Commission’s jurisdiction and, if adopted, could not be certified by the Attorney General.

To remedy these issues, Verizon Wireless requests that the Commission (1) amend the second sentence of R14-2-1903 by striking “, until those Telecommunications Companies are

Chairman William Mundell  
Commissioner Jim Irvin  
Commissioner Marc Spitzer  
November 20, 2001  
Page 2

mandated by law to provide equal access” and (2) amend R14-2-2003 by adding the following new sentence: “These rules do not apply to providers of wireless, cellular, personal communications services or commercial radio services.”

Very truly yours,

**GALLAGHER & KENNEDY, P.A.**

A handwritten signature in black ink, appearing to read "Michael M. Grant", with a long horizontal flourish extending to the right.

By:  
Michael M. Grant

MMG/lmm  
Enclosure  
13581-0003/970993

Chairman William Mundell  
Commissioner Jim Irvin  
Commissioner Marc Spitzer  
November 20, 2001  
Page 3

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TWO COPIES of the foregoing hand-delivered  
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By Linda Magiera

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BEFORE THE ARIZONA CORPORATION COMMISSION

1  
2 WILLIAM A. MUNDELL  
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3 JIM IRVIN  
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4 MARC SPITZER  
COMMISSIONER

5 APPLICATION FOR EMERGENCY  
6 RULEMAKING REGARDING SLAMMING AND  
OTHER DECEPTIVE PRACTICES.

RT-00000J-99-0034

ADDITIONAL COMMENTS OF  
VERIZON WIRELESS

7  
8 As requested in the July 2, 2001 letter of the Utilities Division Director, Verizon  
9 Wireless submits these additional comments on Staff's Second Draft of the Proposed Rules  
10 on Slamming/Cramming ("Second Draft").

11 Background

12 In late May 2001, the Staff released a first draft of proposed rules pertaining to  
13 unauthorized carrier changes ("slamming") and unauthorized carrier charges ("cramming").  
14 Verizon Wireless submitted comments on the first draft noting that (1) the Commission lacks  
15 statutory authority to apply such regulations to wireless carriers, and (2) there is no evidence  
16 of any need for such rules in relation to the wireless industry. For convenience, a copy of the  
June 7 Comments is attached.

17 On July 2, 2001, Staff released the Second Draft. In proposed section R14-2-1903  
18 concerning slamming, Staff proposes to exempt wireless carriers, but only "until such time as  
19 those telecommunications companies are mandated by law to provide equal access or local  
20 number portability." Proposed section R14-2-2003 of the Second Draft concerning  
21 cramming contains no exclusion for wireless carriers.

22 In these comments, Verizon Wireless again submits that the Commission does not

1 have jurisdiction to impose its proposed rules on the wireless industry. Verizon Wireless  
2 urges the Staff to amend the proposed regulations to provide an express exemption for  
3 wireless carriers in both R14-2-1903 and R14-2-2003.

4 Argument

5 In 1999, the legislature passed A.R.S. § 44-1571 *et. seq.* (the "Amendment"). The  
6 Amendment prohibits slamming and cramming practices by both long distance and local  
7 telecommunications service providers and authorizes the Commission to adopt rules  
8 governing subscriber decisions to switch between such providers. See A.R.S. §§ 44-1572.L  
9 and 44-1573.K. Significantly, in defining the terms "long-distance" and "local"  
10 telecommunications service provider, the Amendment expressly excluded "wireless, cellular,  
11 personal communication or commercial radio services" from the requirements of these  
12 articles. See A.R.S. §§ 44-1571.3 and 44-1571.4.

13 Nonetheless, the Staff in the Second Draft applies its proposed cramming regulations  
14 to wireless carriers, and exempts wireless from its slamming rules only on a conditional  
15 basis. In doing so, the Staff ignores the Amendment's wireless exemptions and exceeds the  
16 authority delegated to it by the legislature. Nothing in the proposal explains the Staff's basis  
17 for exerting jurisdiction over wireless carriers in this proceeding. The Staff should reverse  
18 course and act in a manner consistent with its legislative mandate.

19 Sections 44-1572.L and 44-1573.K of the Amendment do not support the Staff's  
20 proposal. While both of these provisions state that, pursuant to the statute, the Commission  
21 may generally adopt rules "not inconsistent with federal law and regulations," this language  
22 does not extend the Commission's jurisdiction to the wireless industry. Consistent with the  
rest of the Amendment, these provisions and their subsections apply only to long-distance  
and local service providers, legislative classifications that, as described above, explicitly

1 exclude wireless providers.

2 Even if the Commission erroneously concludes that sections 44-1572.L and 44-  
3 1573.K apply to the wireless industry, these provisions would still not provide it with the  
4 authority to impose slamming requirements on wireless carriers. Such rules would  
5 contravene the explicit terms of these provisions because they would be “inconsistent with  
6 federal law and regulations.” The FCC has excluded wireless carriers from the obligation to  
7 comply with its slamming rules, without any contingency such as whether they are mandated  
8 to provide equal access or local number portability,<sup>1</sup> and the conditional exemption proposed  
9 by the Commission is certainly contrary to that federal regulatory framework. In addition,  
10 the Commission also should note that A.R.S. §§ 44-1572.L and 44-1573.K in no way address  
11 the Commission’s authority to impose cramming rules, because they relate only to the  
12 adoption of rules concerning subscriber choice of long-distance and local  
13 telecommunications service provider, *i.e.*, slamming. Thus, for the Commission, these  
14 provisions are another jurisdictional dead end.

14 Nor may the Commission rely on Article 15, § 3 of the Constitution to apply  
15 slamming and cramming rules to wireless carriers. As the Commission is aware, that  
16 constitutional provision addresses the Commission’s *ratemaking* authority. Such authority is  
17 ineffectual in the wireless context, since Congress has expressly preempted state authority  
18 over the rates of commercial mobile radio service providers such as Verizon Wireless.  
19 Section 332(c)(3)(A) of the Communications Act states that “no state or local government  
20 shall have any authority to regulate the entry of or the rates charged by any commercial

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21 <sup>1</sup> *Implementation of the Subscriber Carrier Selection Changes Provision of the Telecommunications Act of 1996 and*  
22 *Policies and Rules Concerning Unauthorized Changes of Consumers’ Long Distance Carriers, Second Report and*  
*Order and Further Notice of Proposed Rulemaking, CC Docket No. 94-129, 14 FCC Rcd 1508, para. 86 (1998).*

1 mobile service . . .” 47 U.S.C. § 332(c)(3)(A). In addition, the Court of Appeals held in  
2 1999 that rules like those proposed here that pertain to customer service and billing  
3 requirements do not “relate at all to ratemaking or classification.” U S WEST  
4 Communications, Inc. v. Ariz. Corp. Comm’n., 197 Ariz. 16, 25, 3 P.3d 936, 945 (App.  
5 1999). This decision further demonstrates that the Commission’s constitutional ratemaking  
6 authority under Article 15, § 3 cannot serve as the jurisdictional basis for imposing the  
7 proposed slamming and cramming rules on wireless carriers.

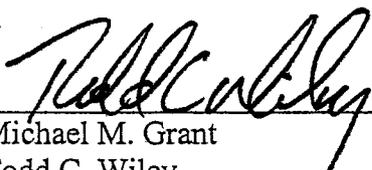
8 Recommendation

9 Verizon Wireless once again urges Staff to exempt wireless carriers for the reasons  
10 stated herein. Without such an exemption, the Rules cannot be certified by the Attorney  
11 General because they exceed the Commission’s authority.

12 Specifically, proposed section R14-2-1903 should be modified to delete “, until such  
13 time as those telecommunications companies are mandated by law to provide equal access or  
14 local number portability.” Proposed section R14-2-2003 should be modified to include the  
15 following sentence: “These rules do not apply to providers of wireless, cellular, personal  
16 communications services or commercial radio services.”

17 RESPECTFULLY SUBMITTED this 6 day of August, 2001.

18 GALLAGHER & KENNEDY, P.A.

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21 Todd C. Wiley  
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Attorneys for Verizon Wireless

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7 Copy of the foregoing mailed  
8 this 10th day of August, 2001 to:

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APPLICATION FOR EMERGENCY  
RULEMAKING REGARDING SLAMMING AND  
OTHER DECEPTIVE PRACTICES.

RT-00000J-99-0034

COMMENTS OF VERIZON  
WIRELESS

Verizon Wireless hereby submits comments on the consumer protection standards proposed by the Arizona Corporation Commission ("Commission") in the above-captioned docket. These comments respond to Commission Staff's proposed slamming and cramming rules as A.A.C. R14-2-2001 through R14-2-2010, and A.A.C. R14-2-1901 through R14-2-1911. In this proceeding, the Commission seeks to implement certain 1999 statutory amendments dealing with consumer fraud. Although these amendments exempt wireless carriers, the Commission proposes to apply its slamming and cramming regulations to all telecommunications companies in Arizona, apparently including wireless carriers. Given the Arizona Legislature's express statutory exemption of wireless carriers, the Commission should make clear that its proposed slamming and cramming rules do not apply to wireless carriers. Even if the Commission had statutory authority to impose its proposed slamming and cramming regulations on wireless telecommunications companies, there is no evidence that wireless carriers in Arizona have engaged in such practices, and no showing that competitive forces in the CMRS industry are not sufficient to prevent such conduct.

**BACKGROUND**

In 1999, the Arizona Legislature enacted a number of amendments to the laws

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1 governing telecommunications services in the state. Ariz. Rev. Stat. §§ 44-1571, 1572, 1573,  
2 1574. These provisions grant the Commission authority to adopt rules to prevent: (i) any change  
3 in an end-user customer's pre-subscribed telecommunications service without the appropriate  
4 consent of that customer, or "slamming" and (ii) the inclusion of any unauthorized or unverified  
5 charges on a customer's bill, or "cramming." Ariz. Rev. Stat. §§ 44-1572(L), 44-1573(K). The  
6 Arizona Legislature applied these rules to "local telecommunications service providers" and  
7 "long-distance telecommunications providers," the definitions of which exclude providers of  
8 "wireless, cellular, personal communication or commercial radio services." Ariz. Rev. Stat. §§  
9 44-1571(3), (4).

10 On May 29, 2001, the Commission released its informal request for comment on  
11 the proposed consumer protection standards in this proceeding. The Commission proposes new  
12 rules designed to prevent slamming and cramming. The detailed regulatory framework would  
13 establish numerous obligations and restrictions, including customer-by-customer and transaction-  
14 by-transaction notice, consent, verification, and record retention requirements. The  
15 Commission's proposal also establishes a customer complaint process, as well as enforcement  
16 procedures and various sanctions and penalties for violating carriers. The Commission indicates  
17 that these proposed rules will apply to all telecommunications companies operating in Arizona.

## 18 DISCUSSION

### 19 I. THE COMMISSION SHOULD CLARIFY THAT ITS PROPOSED RULES DO 20 NOT APPLY TO WIRELESS CARRIERS

21 As indicated above, the Commission is implementing a number of 1999 statutory  
22 amendments designed to prevent slamming and cramming. Ariz. Rev. Stat. §§ 44-1571, 1572,  
23 1573, 1574. While these statutory provisions impose and call for agency adoption of various  
24 restrictions on the business practices of long-distance and local telecommunications providers,

1 they explicitly state that these restrictions do not apply to providers of "wireless, cellular,  
2 personal communications or commercial radio services." Ariz. Rev. Stat. §§ 44-1571.1, 1571.2.  
3 As a result, the Commission lacks statutory authority to apply slamming or cramming regulations  
4 to wireless carriers.

5 In its proposed slamming and cramming rules, however, the Commission states  
6 that these requirements apply "to each 'telecommunications company' as that term is defined in  
7 A.A.C. R14-2-1102.15." Because telecommunications companies are defined as carriers that  
8 provide "telecommunications services," which include wireless services, wireless carriers would  
9 wrongfully appear to be subject to these proposed rules. In order to resolve any resulting  
10 ambiguity and prevent the unnecessary diversion of legal and administrative resources to this  
11 question, the Commission should now explicitly clarify that its proposed rules on slamming and  
12 cramming would not apply to providers of CMRS.

13 **II. ANY COMMISSION RULES ON CRAMMING AND SLAMMING SHOULD**  
14 **EXEMPT CMRS PROVIDERS.**

15 Verizon Wireless recognizes the Commission's duty to protect Arizona  
16 consumers against unreliable or unscrupulous telecommunications companies and appreciates  
17 the seriousness of the Commission's concern with certain deceptive practices that the proposed  
18 rules seek to avoid. Even if the Commission had authority to apply the rules to wireless carriers,  
19 there are numerous policy reasons to exempt wireless carriers from these rules.

20 As discussed further below, the proposed regulations are neither necessary nor  
21 well suited to wireless carriers' dynamic and competitive business practices. To avoid  
22 hampering wireless growth and innovation in Arizona and elsewhere, any rules should exempt  
23 the wireless industry from all of the rules proposed in this proceeding.  
24

1     A.     There is No Evidence of Cramming and Slamming in the Wireless Industry, Where  
2                     Competitive Forces Guard Against Misleading Practices.

3             With its proposal, the Commission has apparently painted the telecommunications  
4 industry with a broad brush. There is no evidence in Arizona or elsewhere that either slamming  
5 or cramming is a problem that befalls wireless consumers. Indeed, the Federal Communications  
6 Commission ("FCC") offered the following commentary on wireless billing practices when it  
7 exempted the wireless industry from most of its truth-in-billing requirements:

8                     The record does not, however, reflect the same high volume of customer  
9                     complaints in the CMRS context, nor does the record indicate that CMRS billing  
10                    practices fail to provide consumers with clear and non-misleading information  
11                    they need to make informed choices.<sup>1</sup>

12             Given the level of competition in the wireless marketplace, slamming and  
13             cramming are extremely unlikely in the wireless context. Wireless providers have enormous  
14             incentive to treat their customers in the most efficient and consumer-friendly manner possible.  
15             Practices that give rise to disputes can encourage customers to change service providers. With  
16             multiple wireless carriers doing business in Arizona, customers have a variety of service options  
17             and can address their dissatisfaction with one carrier by taking their business to another  
18             provider.<sup>2</sup>

19             The willingness of customers to change carriers is reflected in industry churn  
20             rates. Nationally, churn in the wireless industry in recent years has averaged from 2% to 4.2%

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21             <sup>1</sup> Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking,  
22             Federal Communications Commission, FCC Rcd, CC Docket No. 98-170, para. 16 (1999) ("*FCC Truth-in-Billing*  
23             *Order*").

24             <sup>2</sup> In fact, requiring all wireless providers in Arizona to comply with these highly prescriptive regulations  
              will discourage service differentiation and competition between carriers. Customer relations and billing practices  
              are an important basis for competition and consumer choice, and carriers distinguish themselves from their  
              competitors in the marketplace through their conduct in this area. By discouraging such competition, a requirement  
              that all wireless telecommunications companies adopt the same procedures with respect to such practices may  
              actually diminish consumer welfare.

1 per month, depending upon the carrier. Such monthly rates translate into a yearly turnover of  
2 25% to 50% of a wireless carrier's customer base. While churn is driven by many factors,  
3 wireless telecommunications companies seize every opportunity to minimize customer problems  
4 and retain their customer base.

5 Existing federal law renders slamming particularly unlikely in the wireless  
6 marketplace. Slamming is premised on the concept of one long distance carrier unlawfully  
7 directing a customer's local phone company to substitute it for that customer's existing long  
8 distance service provider. Wireless telecommunications companies, however, are not subject to  
9 equal access requirements,<sup>3</sup> a fact that leaves them free to designate any toll carrier for their  
10 subscribers. Wireless carriers thus generally do not offer customers the option of selecting a toll  
11 carrier as part of their package of wireless services; instead, they often bundle long distance and  
12 local services. With respect to cramming, wireless providers routinely add charges for services  
13 ordered by the customer that relate to the underlying wireless services, and there is simply no  
14 record of complaints in Arizona or elsewhere of cramming in the wireless industry. If applied to  
15 such routine transactions, the Commission's highly prescriptive rules could dramatically reduce  
16 the ease with which customers can make changes to their accounts, while doing nothing to  
17 prevent the deceptive acts from which the Arizona legislature intended to protect consumers.

18 **B. Application of the Proposed Rules to CMRS Providers Will**  
19 **Impose Significant Costs and Provide Few Benefits.**

20 Compliance with the Commission's proposed slamming and cramming rules  
21 would impose a substantial burden on wireless providers. The various rules on notice, consent,  
22 record retention, and other practices would require the evaluation and likely modification of  
23 many providers' operational systems and procedures. Providers such as Verizon Wireless would

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24 <sup>3</sup> 47 U.S.C. § 332(c)(8).

1 be forced to expend significant dollars for capital investments, employee training, systems  
2 enhancements, and other materials. As discussed further below, these expenditures will yield no  
3 benefit for Arizona's wireless consumers. In addition, many wireless carriers already have in  
4 place many procedures like those identified in the rules, and even if any specific wireless  
5 telecommunications company does not have procedures that align precisely with those contained  
6 in the proposed rules (i.e., notice, consent, verification), their practices must be fair and  
7 reasonable in a competitive marketplace or they will lose customers to other carriers. There is  
8 simply no need to impose regulatory requirements when there is no evidence that such  
9 misleading or deceptive practices occur in the wireless marketplace.

10 **C. The Commission Should Look to the FCC's Treatment of the Wireless Industry as a**  
11 **Guide in This Proceeding.**

12 Before imposing burdensome slamming and cramming regulations on wireless  
13 telecommunications companies, the Commission should consider the FCC's approach to these  
14 issues in the wireless context. In recent years, the FCC has carried out two lengthy proceedings  
15 in which it has studied the issues of slamming and cramming in the telecommunications industry  
16 as a whole and accumulated an extensive public record on these harmful practices. In both  
17 proceedings, the FCC has recognized that the business and operational practices of wireless  
18 providers differ from those of local exchange and long distance providers, and it has taken these  
19 distinctions into account in its formulation of new regulation.

20 In the slamming context, the FCC has rightfully concluded that the record of few  
21 complaints against wireless providers supported its decision to exclude the wireless industry  
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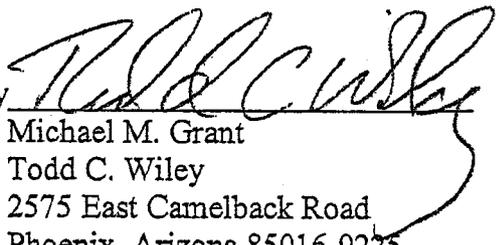
1 from its slamming rules.<sup>4</sup> With respect to cramming, the FCC in its Truth-in-Billing docket  
2 again noted the absence of a record of complaints against wireless providers, and has not  
3 extended cramming regulations to wireless carriers. Instead, the FCC has chosen to apply only  
4 two very broad principles relating to information provided on customers' bills to CMRS  
5 providers. In doing so, it has struck the appropriate balance between continued consumer  
6 protection and the avoidance of unnecessary and burdensome regulation of the wireless industry.  
7 Since Arizona wireless providers must already comply with these federal requirements, there is  
8 no basis for imposing additional requirements at the state level.

9 CONCLUSION

10 Verizon Wireless urges the Commission to make clear that wireless  
11 telecommunications companies are exempt from its proposed slamming and cramming rules  
12 based on the intent of the Arizona legislature. Such rules are also unnecessary because market  
13 forces in the wireless industry are sufficient to prevent such conduct.

14 DATED this 7 day of June, 2001.

15 GALLAGHER & KENNEDY, P.A.

16  
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21  
22 \_\_\_\_\_  
23 <sup>4</sup> In carving out the wireless exemption, the Commission stated that “[c]ommercial mobile radio services  
24 (CMRS) providers shall be excluded from the verification requirements of this Subpart as long as they are not  
required to provide equal access to common carriers for the provision of telephone toll services, in accordance with  
47 U.S.C. § 332(c)(8).” As noted above, wireless carriers are not required to provide equal access.

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2 7<sup>th</sup> day of June, 2001 with:

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