

specifically states that "[w]e rely on the Commission's conclusions in its Further Notice that the benefits of BPP significantly exceed the cost of implementation," without providing any separate analysis. Similarly, the Idaho PUC (p. 6) only supports BPP "if BPP can be implemented in a cost-effective manner (emphasis added)." The Missouri PSC (p. 4) asserts that the benefits of BPP should outweigh its costs, principally because it "disagree[s] that those costs are very large." The comments clearly show, however, that the FNPRM's analysis is not correct, that the actual costs of BPP are extremely large, and that there is no reasonable basis upon which to conclude that BPP's benefits could outweigh its costs.

Sprint attempts to show that the analysis in the FNPRM is conservative, predicting (p. iv) "that this round of further comments will demonstrate that the quantifiable benefits of billed party preference are even greater in relation to costs than the prior record showed." Notwithstanding Sprint's assertion, however, the record proves otherwise.

First, Sprint (pp. 6-9) assumes that BPP may generate additional customer savings because customers have an "aversion" to using access codes. This assumption is completely refuted by the recent data on the growth in

access code usage<sup>54</sup>. Moreover, Sprint's claim (p. 8) that consumers "even may be willing to forego substantial savings"<sup>55</sup> in return for the simplicity of 0+ dialing is directly contradicted by Ameritech's research. Ameritech (pp. 7-8) demonstrates that consumers place relatively little economic value on such convenience, and that they are ready and willing to dial access codes for only small savings. Moreover, research cited by Bell Atlantic (n.20) indicates that "92 percent of consumers are willing to dial access codes if they could receive substantial savings."

There is also no support for Sprint's assertion (pp. 13-14) that the \$.19 per minute rate differential between the largest OSPs and third tier OSPs used in the FNPRM's analysis may be understated. Sprint's claim is based upon the belief that the rates used in the FNPRM for the "sample" third tier OSPs may have been too low and not representative of all third tier carriers. Sprint ignores, however, the inclusion of ITI (now part of Oncor) in the sample. Half of ITI's sample calls were priced at the highest level of any reporting carrier.<sup>56</sup> Moreover, AT&T

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<sup>54</sup> See Part IV above.

<sup>55</sup> See also MCI, n.4.

<sup>56</sup> Ten of the twenty reported calls from ITI were priced above \$10. No other carrier reported any prices in that range. See Final Report of the FCC Pursuant to the Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA Report"), Chart 5.B.

(pp. 6-7) shows that the average price per minute used in the FNPRM for all third tier OSPs is more likely to be overstated than understated.

Sprint (p. 15) also asserts that the FNPRM uses an OSP industry growth rate that is too conservative, arguing that it is more appropriate to use the 1992-93 growth rate for all interstate switched access minutes. However, the comments<sup>57</sup> show that operator services traffic is growing very slowly, if at all, largely because consumers are changing the ways they place their away from home calls.

Next, Sprint (p. 16) asserts that growth in the placement of IPP payphones may cause a smaller than predicted decline in the market share of the highest priced OSPs. Thus, Sprint "believes" BPP may help customers save more than the \$280 million projected in the FNPRM. Even if private payphone placement is growing, it would only have a minimal impact on the market share of "high priced" OSPs, because IPP payphones generate less than 10% of all traffic from aggregator telephones.<sup>58</sup> Moreover, APCC's data (p. 24) indicates that the market share of third tier OSPs "has already dropped by more than one-third (emphasis in

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<sup>57</sup> See pp. 10-11 above.

<sup>58</sup> It should also be noted that even at IPP/OSP payphones, calls charged to proprietary calling cards can only be carried and billed by the issuing carrier.

original)."<sup>59</sup> In all events, the Commission has the power -- and the duty -- to assure that all OSP rates are just and reasonable, even in the absence of BPP. Thus the savings from consumer avoidance of BPP are likely to be much less, not more, than predicted in the FNPRM.

Sprint also asserts (p. 19) that its experience shows that the Commission used an inappropriately low rate to calculate projected "savings" from reduced OSP commission payments. This assertion ignores important facts. The 12% commission rate used in the FNPRM's analysis is an aggregate rate, based upon all commissions paid and all "away from home" OSP revenues. Thus, there is no reason to believe that the commission rates paid by Sprint are indicative of the total average commission rate paid by the entire industry. If, as AT&T believes, Sprint's commission contracts are limited to "choice" aggregator locations (i.e., high-volume locations which OSPs deem to be the most attractive) the rates paid by Sprint should be expected to exceed the industry average. There are, however, many smaller aggregator locations where commissions below 12% are paid, and substantial numbers of very small locations with light traffic where no commissions are paid at all. For example, over half of the LEC payphones presubscribed to AT&T in 1991 did not have a commission contract with AT&T.

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<sup>59</sup> See also BellSouth, n.10.

In all events, AT&T's comments (p. 12 and Attachment B) show that BPP would generate few, if any, net savings, even if the average commission rate were increased to 14%, and even if no deduction were made for the 18% of traffic identified as intraLATA in the FNPRM.<sup>60</sup>

Finally, Sprint (p. 24) is wrong in asserting that the benefits of BPP would be analogous to those resulting from 800 number portability. Under the old 800 numbering system, subscribers who had invested in promoting their 800 numbers were locked into only one service provider and had no ability at all to use other carriers for calls to that number. On the other hand, existing law and rules enable consumers to use access codes to place operator services calls from any phone using any available OSP.<sup>61</sup>

**VI. BPP Would Not Achieve the Commission's Objectives If It Did Not Apply To IntraLATA Calls and Require 14-Digit Screening.**

Many commenters agree with AT&T that BPP should not be adopted unless it applies to all "0" dialed calls, including intraLATA calls, and unless a 14-digit screening mechanism were required for telephone line number-based calling cards.

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<sup>60</sup> See also Attachment C to this reply.

<sup>61</sup> See also USIN, p. 4, which describes technical dissimilarities between BPP and 800 databases services.

The FNPRM (§ 9) states that the primary objective of BPP is to establish a single, simple dialing protocol for everyone. AT&T (pp. 25-27) and numerous commenters<sup>62</sup> agree that this goal cannot be achieved unless BPP applies to "0" dialed intraLATA calls. The alternative would be consumer chaos. As INS (pp. 17-18) correctly describes:

"Most callers do not know whether their calls will cross LATA boundaries and, therefore, would have no way of knowing which carrier would receive their call if they dialed on a 0+ basis. Thus, callers would experience confusion and, ultimately, are likely to continue to employ only a 10XXX, 800 or 950 access code to reach their preferred carrier."<sup>63</sup>

The Commission should not require the industry and consumers to bear a multi-billion dollar expense in order to implement a partially effective and confusing new dialing system. If BPP cannot be implemented on a total basis for all "0" dialed calls, including intraLATA calls, it should not be adopted at all.<sup>64</sup> Moreover, as Sprint (p. 57) notes, BPP would not achieve its maximum potential benefit unless it were implemented on a "flash cut basis nationwide."<sup>65</sup>

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<sup>62</sup> E.g., APCC, n.3; CompTel, pp. 48-49.

<sup>63</sup> See also LDDS, pp. 3-5 (BPP will not foster consistent use of 0+ dialing); ATU, p. 3; NTI, p. 7.

<sup>64</sup> See LDDS, p. 12 ("The Commission should proceed with BPP only if a truly universal plan can be implemented").

<sup>65</sup> This may, however, create practical difficulties for smaller LECs (see, e.g., GVNW, p. 2; INS, p. ii; OPATSCO, p. 2).

Similarly, the FNPRM's goal of promoting competition cannot be achieved unless BPP includes 14-digit screening for TLN-based cards.<sup>66</sup> Even Sprint, a strong BPP proponent, supports this requirement. Sprint (p. 49) states that "[o]f the numbering formats that are compatible with billed party preference . . . [TLN-based numbering] is clearly the most convenient from the consumer's point of view," because consumers already know the first ten digits. Thus, it is important that all carriers be able to issue BPP-compatible cards that are based upon telephone line numbers, and that can be distinguished on the basis of 4-digit PINs. As Sprint (p. 52) notes, this capability will facilitate competition by smaller carriers and make it most convenient for consumers to sample the services of multiple carriers in a risk-free manner.<sup>67</sup>

Moreover, notwithstanding the claims of some LECs,<sup>68</sup> the incremental costs of 14-digit screening are not substantial when compared to the huge initial investment

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<sup>66</sup> AT&T, pp. 29-30; AMNEX, p. 13; Cleartel, p. 16; CompTel, pp. 49-50; LDDS, pp. 12-13; Oncor, pp. 8-9.

<sup>67</sup> The opponents of 14-digit screening disagree on the demand for this capability. Bell Atlantic (p. 21), for example, states that there "is no reason to believe that consumers want multiple calling cards." GTE (p. 20), however, assumes that 14-digit screening "will significantly increase the number of calls billed to a line number or joint card."

<sup>68</sup> E.g., GTE, p. 20.

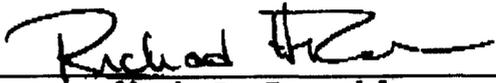
required by BPP. Most RBOCs who provided cost information state that this capability would only add a few million dollars to their implementation expense.<sup>69</sup> Thus, any version of BPP adopted by the Commission should include a 14-digit screening requirement.

CONCLUSION

BPP is excessively expensive, fails to meet the Commission's objectives, and, in its currently proposed form, could confuse consumers and restrict competition. Accordingly, BPP would not serve the public interest and it should not be adopted.

Respectfully submitted,

AT&T CORP.

By   
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September 14, 1994

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<sup>69</sup> See n.12 above.

Attachment A

CC DOCKET NO. 92-77  
BILLED PARTY PREFERENCE  
FOR 0+ INTERLATA CALLS

COMMENTERS

Adams County Sheriff's Department  
Adams State College  
AHA TelePlan  
Airports Association Council International - NA ("ACI-NA")  
Howard B. Alfred  
America's Carriers Telecommunications Association ("ACTA")  
American Association of Airport Executives ("AAAE")  
American Council on Education and The National Assn.  
of College and University Business Officers ("ACE/NACUBO")  
American Network Exchange, Inc. ("AMNEX")  
American Public Communications Council ("APCC")  
Ameritech  
Ameritel Pay Phones, Inc.  
Anchorage Telephone Utility ("ATU")  
Arizona Department of Corrections  
Aspen/Pitkin County Airport  
AT&T Corp.  
Auburn University  
City of Austin  
Beckham County Sheriff  
Bell Atlantic  
BellSouth Telecommunications, Inc. ("BellSouth")  
Branson Telephone  
State of CA-State and Consumer Services Agency - Dept.  
of General Services-Telecommunications Division  
State of California, Department of Corrections  
California State Board of Corrections  
California Department of Youth Authority  
Call America  
Capital Network System, Inc. ("CNS")  
Cedar County Sheriff  
Robert Cefail & Asso. American Inmate Comm., Inc.  
Central Atlantic Payphone Association ("CAPA")  
Cherokee Communications ("Cherokee")  
Chester County Prison  
Chicot County  
Cincinnati Bell Telephone Company ("CBT")  
The Circle K Corporation  
Citizens United for Rehabilitation of Errants  
Claremont University Center  
Clarion County Prison

The Clark County Law Enforcement Center  
Cleartel Communications, Inc. and Call America ("Cleartel")  
The Cleveland Clinic Foundation  
Cleveland County Sheriff  
The Coconino County Sheriff's Dept.  
County Sheriffs of Colorado  
Colorado Public Utilities Commission ("Colorado PUC")  
Colorado School of Mines  
City of Colorado Springs  
Communications Management Systems, Inc. ("CMS")  
Competitive Telecommunications Association ("CompTel")  
Conquest Operator Services Corp ("Conquest")  
Consolidated Communications Operator Services, Inc.,  
    Illinois Consolidated Telephone Co., Consolidated  
    Network Inc. and Consolidated Communications  
    Public Services ("Consolidated")  
Sheriff of Conway County, Arkansas  
Crow Wing County Jail  
Davies County  
Days Inn  
County of Dickinson  
Dougherty County Sheriff's Office  
County of Erie  
Federal Bureau of Prisons  
Florida Department of Corrections  
Florida Public Telecommunications Association ("FPTA")  
Floyd County Jail, Indiana  
Frederick County Adult Detention Center  
Gallahan Oil Co. Inc.  
Gateway Technologies, Inc.  
General Communications, Inc. ("GCI")  
County of Georgetown Detention Center  
Gold Coast  
Greene County Sheriff's Dept., Paragould, Arkansas  
Greenville County Detention Center, Greenville, SC  
GTE  
GVNW Inc./Management  
Harford County Sheriff's Office  
Howard Johnson  
Huttonsville Correctional Center  
Idaho Public Utilities Commission ("Idaho PUC")  
Inmate Calling Services Providers Task Force  
Intellicall Companies ("Intellicall")  
Interlink Telecommunications, Inc.  
Iowa Network Services, Inc. ("INS")  
Jeffco Airport  
Jefferson County Sheriff's Dept.  
Kane County Adult Corrections Center  
Kansas City Downtown Airport  
County of Kenosha (Wisconsin)

Kern County Minimum Security Facility  
King County International Airport  
Lake County Sheriff's Adult Correctional Facility  
Lamar County Detention Center  
Lancaster County Prison  
Larimer County Detention Center  
LDDS Communications, Inc. ("LDDS")  
County of Lehigh, Dept. of Corrections  
LinkUSA  
LITS, Inc.  
Maine Sheriffs' Association  
McCarran International Airport ("McCarran")  
McLeod County Law Enforcement Center  
MCI Telecommunications Corp. ("MCI")  
Mendocino County Correctional Facility  
Mercer County Sheriff's Department (CA)  
MessagePhone, Inc.  
MFS Communications Company, Inc. ("MFS")  
Michigan Department of Corrections  
Midwest Independent Coin Payphone Association ("MICPA")  
Minnesota Department of Corrections  
Mississippi Department of Corrections  
Missouri Public Service Commission ("Missouri PSC")  
MMI Hotel Group  
Monmouth County Correctional Institution  
National Association of State Utility Consumer Advocates  
("NASUCA")  
National Association of Regulatory Utility Commissioners  
("NARUC")  
National Auto/Truckstops, Inc.  
National Telephone Cooperative Association ("NTCA")  
National Tele-Sav, Inc.  
Nevada Payphone Association  
New Jersey Payphone Association ("NJPA")  
State of New York Dept of Correctional Services  
North Carolina Payphone Association, Inc.  
North Dakota State Penitentiary  
Northwest Hospitality Management Company  
NYNEX  
Oakland International Airport  
Oakland County Department of Public Works  
Occidental College  
Oklahoma Sheriffs' Association  
ONCOR Communications, Inc. ("Oncor")  
Sheriff, Oneida County (NY)  
Onondaga County Department of Correction  
Operator Service Company  
Opus Correctional Inc. d/b/a/ Loctel  
Oregon Department of Corrections

Organization for the Protection and Advancement of  
Small Telephone Companies ("OPATSCO")  
Owen's Public Phone & Fax  
Pacific Bell and Nevada Bell ("Pacific")  
Pacific Telcom  
Park Inn International  
Payphones, Inc.  
Pay-Tel  
Peabody Hotel Group  
Perry County Sheriff's Office, Illinois  
Polar Communications Corp. and Digital Technologies, Inc.  
("Polar")  
Portor County Sheriff  
Prairie Correctional Facility  
Public Utility Law Project of New York Inc.  
City of Pueblo, Colorado  
Racine County  
Ramada Franchise Systems, Inc.  
Rhode Island Department of Corrections  
Richland County Detention Center  
Richland County Detention Center  
RochesterTel ("Rochester")  
Daniel J. Rooks  
County of Sacramento Department of Airports  
Salt Lake City Airport Authority  
San Jacinto County Jail, Texas  
San Patricio County  
SDN Users Association, Inc.  
Seneca County  
Sevier County Sheriff's Dept.  
Shasta County Sheriff's Department - Main Jail  
Shilo Inns  
Sheriff's Office of Smyth County  
County of Sonoma Sheriff's Department  
State of South Carolina, Office of Information Resources  
South Carolina Department of Corrections  
South Carolina Jail Administrators Association  
South Dakota Department of Corrections  
Southern New England Telephone Company ("SNET")  
Southwestern Bell Telephone Company ("SWBT")  
Spokane Airports  
Spokane County Sheriff  
Sprint Corporation ("Sprint")  
Summit County Sheriff's Office, Akron, Ohio  
Super 8 Motels, Inc.  
Swisher County Sheriff's Office, Tulia, TX  
Telco West, Inc.  
Tele-matic Corporation  
County Judge of Tarrant County

Teleport Communications Group Inc. ("Teleport")  
Teltrust, Inc., Teltrust Communications Services, Inc.  
Teltrust Phones, Inc. ("Teltrust")  
Thomas County Sheriff's Office  
United States Telephone Association ("USTA")  
U.S. Intelco Networks, Inc. ("USIN")  
U.S. Long Distance, Inc. ("USLD")  
U.S. Osiris Corporation  
Value-Added Communications, Inc.  
Commonwealth of Virginia  
Virginia State Corporation Commission Staff ("Va.SCC")  
Walworth County Sheriff's Department, WI  
Sheriff of Washington County, Oregon  
State of Washington - Dept. of Corrections  
Airport Authority of Washoe County  
Waterway Communications System, Inc.  
West Central Minnesota Jail Administrators Assn.  
County of Wood/Office of the Sheriff  
Yuma County Adult Detention Facility  
Denton County Sheriff's Department

**Attachment B  
Billed Party Preference  
Cost Summary  
(Smillions)**

	FCC FNPRM Analysis <u>Non-Recurring Cost</u>	Industry FNPRM Comments <u>Non-Recurring Cost*</u>	<u>Difference</u>	FCC FNPRM Analysis <u>Recurring Cost</u>	Industry FNPRM Comments <u>Recurring Cost</u>	<u>Difference</u>
<b>LEC:</b>						
Ameritech	48.80	104.00		14.10	35.00	
Bell Atlantic	125.50	153.00		8.60	9.00	
BellSouth	145.60	100.00		6.80	29.00	
GTE	112.40	160.30		25.40	52.60	
NYNEX	129.40	120.40		13.70	20.70	
Pacific Telesis	144.40	144.40 ****		26.10	26.10 ****	
SW Bell	160.90	118.90		9.00	15.30	
US West	149.90	149.90 ****		27.80	27.80 ****	
USTA**	197.80	318.09		17.50	10.50	
SNET	#	33.00			14.00	
CBT		9.00			8.30	
Sprint LTD	#	272.40			4.70 ***	
<b>sub-total LEC</b>	<b>1,214.70</b>	<b>1,683.39</b>		<b>149.00</b>	<b>383.00</b>	
<b>OSP - Network &amp; Operating:</b>						
AT&T	68.00	68.00				
MCI	19.50	19.50 ****				
Sprint	6.50	6.50				
All Other IXCs/OSPx	26.00	26.00				
<b>sub-total OSP</b>	<b>120.00</b>	<b>120.00</b>				
<b>OSP - Other Costs:</b>						
Stranded OSP Assets (AT&T Only)		80.00				
OSP Industry marketing costs		250.00			150.00	
<b>sub-total OSP Other Costs</b>		<b>330.00</b>			<b>150.00</b>	
<b>Total</b>	<b>1,334.70</b>	<b>1,803.39</b>	<b>(468.69)</b>	<b>149.00</b>	<b>433.00</b>	<b>(284.00)</b>

**Notes:**

\*These costs assume the following:

- the costs of 14-digit screening for calling card calls has not been included
- costs include OSS7 signaling to the end office
- costs do not include overhead loadings
- costs to implement passive balloting for a 0+ PIC are included for all companies

\*\*USTA figures are assumed to include costs for all independent companies except GTE, Sprint LTD (United), SNET and CBT. Costs estimates submitted by other LECs and associations representing LECs (e.g. Anchorage Tel. Utility, OPASTCO) are assumed to be included in the USTA figures.

\*\*\*Sprint LTD figure includes \$3.5 million in "live" operator expense outlined in their FNPRM Comments (p. 31, footnote 34)

\*\*\*\*Cost estimates were not updated in FNPRM Comments submitted on August 1, 1994

#cost estimates were submitted but not included in the FCC FNPRM Analysis

**BENEFITS FROM REDUCED OSP COMMISSIONS AT 75% DIAL-AROUND RATE**  
(All figures in millions except percents)

**I. FNPRM-Based Analysis**

1997 Industry "Away from Home" Revenues (assuming 4.3% growth rate)	\$7,700
Less 18.1% IntraLATA	<u>(1,394)</u>
1997 InterLATA "Away from Home" revenues	\$6,306
25% 0+ traffic	<u>x .25</u>
1997 Commissionable InterLATA Revenues	\$1,577
Commission rate (12%)	<u>x .12</u>
1997 InterLATA Commissions	\$ 189
Less FNPRM Adjustments:	
Increased Dial-Around Compensation	(22) <sup>1</sup>
Commissions on Reduced 3rd Tier Share	<u>(17)</u>
1997 InterLATA Commissions Less Adjustments	\$ 150

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<sup>1</sup> This amount is significantly understated. First, it ignores the expense created by the existing dial-around compensation rules. In addition, this figure was calculated on the assumption that there would be only 50%, rather than 75%, dial-around in 1997.

**II. FNPRM-Based Analysis Using Actual Growth Rate**

1991 Industry "Away from Home" Revenues	\$6,100
Actual Industry Growth Rate	<u>x 0.63%</u>
1997 Industry "Away from Home" Revenues	\$6,334
Less 18.1% IntraLATA	<u>(1,146)</u>
1997 InterLATA "Away from Home" Revenues	\$5,188
25% 0+ traffic	<u>x .25</u>
1997 Commissionable InterLATA Revenues	\$1,297
Commission Rate (12%)	<u>x .12</u>
1997 InterLATA Commissions	\$ 156
Less FNPRM Adjustments:	
Increased Dial-Around Compensation	(22) <sup>2</sup>
Commissions on Reduced 3rd tier Share	<u>(17)</u>
1997 InterLATA Commissions Less Adjustments	\$ 117

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<sup>2</sup> See note 1 above.

**III. AT&T-Based Analysis Using 75% Dial-Around Rate<sup>3</sup>**

1991 Industry "Away from Home" Revenues	\$6,100
Actual Industry Growth Rate	<u>x 0.63%</u>
1997 Industry "Away from Home" Revenues	\$6,334
25% 0+ Traffic	<u>x .25</u>
1997 Commissionable Revenues (including IntraLATA)	\$1,584
Commission Rate (14%)	<u>x .14</u>
1997 Commissions	\$ 222 <sup>4</sup>

**Impact of BPP-Related Expenses**

1997 Aggregator Average Compensation (as percentage of Total "Away from Home" Revenues, including all dial-around compensation):

@ 6%	\$380
@ 5%	317
@ 4%	253
@ 3%	190
@ 2%	127

1997 OSP Commission "Savings" (i.e., 1997 Commissions less Average Aggregator Compensation) before incremental marketing expense:

@ 6%	\$(158)
@ 5%	(95)
@ 4%	(31)
@ 3%	32
@ 2%	95

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<sup>3</sup> Based upon the analysis in Attachment B to AT&T's comments.

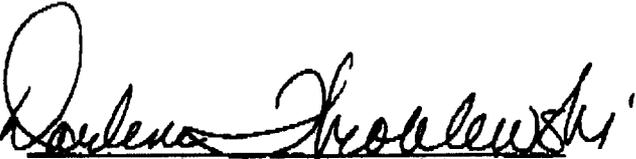
<sup>4</sup> This amount equals 3.5% of total "away from home" revenues, less than half of the 1991 Total Average Aggregator Compensation of 8.2% calculated in Table 4 of the Commission's TOCSIA Report.

Net consumer savings after deduction of \$150 million in incremental annual OSP marketing expense required by BPP:

@6%	\$ (308)
@5%	(245)
@4%	(181)
@3%	(118)
@2%	(55)

CERTIFICATE OF SERVICE

I, Darlene Wroblewski, do hereby certify that on this 14th day of September, 1994, a copy of the foregoing Reply Comments of AT&T Corp. was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.

  
Darlene Wroblewski

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