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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
International Settlement Rates)
)

IB Docket No. 96-261

**REPLY OF
HONGKONG TELECOM INTERNATIONAL**

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SUMMARY

Numerous commenters, including Hong Kong Telecom International ("HKTI"), have demonstrated that the U.S. settlements deficit and accounting rates are not directly interrelated. The *NPRM*'s claim that a very significant proportion of the U.S. deficit is due to above-cost accounting rates is unsupported. As commenters overwhelmingly show, the U.S. IMTS traffic imbalance and the net settlements deficit are significantly affected by callback and refile services promoted by U.S. carriers, as well as various other socio-economic factors. It is therefore not necessarily true that reduced accounting rates will lead to a reduction in the U.S. settlements deficit. In fact, the Commission's proposed approach may be counterproductive and could well lead to dramatic and deleterious increases in the traffic imbalances of other countries.

Moreover, there is no assurance that additional forced reductions in accounting rates will benefit U.S. consumers. Indeed, U.S. carriers have increased collection rates on many routes as accounting rates have dropped. The most direct means of ensuring that U.S. consumers benefit from changes in accounting rates would be for the Commission to focus directly on the collection rates charged to U.S. consumers by U.S. carriers.

Further, the Commission's proposals to condition utilization of certification of service authorizations on compliance with the benchmarks cannot be justified as necessary to guard against competitive behavior. Imposing market-entry conditions on foreign carriers is inconsistent with both the Most Favored Nation and National Treatment principles embodied in the WTO Basic Telecommunication Services agreement. In addition, the blanket, *a priori* approach proposed in the *NPRM* is both overbroad and overinclusive. There is no established link between the proposed enforcement mechanisms and the alleged problems the *NPRM* seeks to redress. Indeed, there is no evidence in the record indicating that any

foreign carriers are in fact engaging in the feared anticompetitive behavior. Nonetheless, the proposed approach would "penalize" all foreign carriers. Such an *ex ante* remedy directed at an inherently speculative problem will serve only to restrict the growth of competition in the IMTS market, thereby disserving the *NPRM's* stated goals.

Finally, commenters have overwhelmingly demonstrated that international law prohibits the Commission from establishing international accounting rates unilaterally. The record is clear that the Commission does not have jurisdiction for such action. The *NPRM's* proposals not only are based on a misperception of the FCC's jurisdiction, but also ignore the rights of foreign administrations to regulate telecommunications within their territories and to promote their own chosen social policy objectives.

The ITU has been involved in a comprehensive study of the current accounting rate system; in addition, many carriers and foreign administrations have demonstrated their willingness to work to achieve accounting rate reform. The Commission should take best advantage of this ongoing process, and continue its efforts through the ITU. Only reform sponsored by the ITU will result in globally acceptable accounting rate reform.

Before the
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Washington, D.C. 20554

In the Matter of)
) IB Docket No. 96-261
International Settlement Rates)

To: The Commission

REPLY OF HONGKONG TELECOM INTERNATIONAL

HKTI, by its attorneys, submits the following Reply to the comments filed on the Commission's *Notice of Proposed Rulemaking* ("*NPRM*")¹ in the above-captioned proceeding.

HKTI remains committed to the principle that accounting rates should be reformed to keep pace with changes in international telecommunications technology and services, and applauds the Commission's general efforts in that regard. However, HKTI believes that the record clearly shows that the specific proposals of the *NPRM* will not further the Commission's ultimate goals of promoting competition in the international message telephone service ("IMTS") market and reducing IMTS costs for U.S. consumers. The commenters overwhelmingly agree that the *NPRM*'s unilateral approach towards the implementation of reduced settlement rates and prevention of market distortions is unwarranted. Among foreign commenters there is a consensus that the *NPRM* is inconsistent with the Commission's

¹ *International Settlement Rates*, IB Docket No. 96-261, Notice of Proposed Rulemaking, FCC 96-484 (rel. Dec. 19, 1996).

obligations under international law and ultimately will impede the efforts of both the international community and the FCC itself to achieve lasting and effective accounting rate reform.

I. THE *NPRM* IS BASED ON UNSUPPORTED ASSUMPTIONS CONCERNING THE U.S. SETTLEMENTS DEFICIT

The approach taken in the *NPRM* is premised in large measure on the assumption that reduced accounting rates would alleviate the U.S. settlements deficit. As commenters have noted, however, that is not necessarily true.² The record shows -- and the Commission has acknowledged -- that the U.S. IMTS traffic imbalance, and hence the U.S. settlements deficit, is caused significantly by services promoted by U.S. carriers such as callback and refile.³ As traffic imbalances can be caused by these or several other factors, there is absolutely no assurance that the reforms promoted by the Commission will actually result in a lower deficit. In fact, it is possible that the deficit may be aggravated. It is also true that this "deficit" is not indicative of a trade "problem." The net (of settlement) billed revenue of U.S. carriers has changed very little in recent years. The Commission's justification for the *NPRM's* proposals is seriously weakened by these factors.

Moreover, it is clear that the United States is not the only country with a settlements deficit. The record supports HKTI's view that any reform of accounting rates must be undertaken on a systemic basis, and that dramatic dislocations caused by U.S. efforts to resolve its deficit issue may result in greater dislocations elsewhere.

² See, e.g., Caribbean Association of National Telecommunication Organizations ("CANTO") Comments at 5; KDD Comments at 11-12; Telintar Comments at 6.

³ See *NPRM*, ¶ 12; see also C&W Comments at 21-24; France Telecom Comments at 6-7; KDD Comments at 7-8; Singapore Telecom Comments at 3-6.

II. REDUCTIONS IN ACCOUNTING RATES HAVE NOT BENEFITTED U.S. CONSUMERS

As numerous parties have shown, there is no direct relationship between settlement rates and the collection rates paid by U.S. consumers for IMTS.⁴ Accordingly, there is no necessarily direct correlation between a forced reduction in settlement rates and a reduction in U.S. IMTS rates. The record shows that AT&T is incorrect in its argument that a slight recent decrease in its average revenue per minute shows that settlement rate reductions have resulted in lower rates for U.S. consumers.⁵ AT&T has not presented any data that show reductions in the average rate per minute for the traffic it carries for U.S. end-users.⁶ In the absence of such data specifically related to U.S. end-users, there is no evidence that a decline in AT&T's total average rate per minute indicates that settlement rate reductions have resulted in lower IMTS rates for U.S. consumers.

⁴ See, e.g., C&W Comments at 18-20; KDD Comments at 10; Pacific Bell Comments at 3; Telefónica del Perú Comments at 9-11; United Kingdom Comments at 1.

⁵ AT&T Comments at 9-10.

⁶ AT&T's use of the effective settlement rate ("ESR") calculation to show that U.S. consumers have benefitted from a reduction in settlement rates is misleading. AT&T Comments at 7. In 1995/96, approximately 35% (up from 0% in 1993) of the traffic to Hong Kong from the U.S. constituted either callback or refile, and this percentage is rising rapidly. In the case of callback, calls are originated and paid for by customers in Hong Kong, and are terminated in the U.S. or beyond. In the case of refile, calls are generated and paid for by customers outside the U.S. and terminated in Hong Kong. Neither callback nor refile traffic is generated by U.S. consumers, and hence neither is billed to U.S. consumers. Accordingly, the denominator of the ESR ratio -- which includes only U.S.-billed minutes -- is significantly understated, and the ESR and AT&T's Chart A are therefore misleading. See AT&T Comments at 7. Assuming that Hong Kong's traffic is representative of global trends, and factoring out of the ESR the 35% that is the traffic attributed to callback and refile, the ESR becomes approximately \$0.21 rather than \$0.33. Accordingly, there has actually been a reduction of 39% -- not the 6% mentioned by AT&T -- in outpayment costs over the relevant four years.

Indeed, data provided by the Commission show that AT&T has increased its collection rates for U.S. end-users in the face of dramatic decreases in accounting rates. In its most recent International Trends Report the FCC presented statistics showing that since 1992 -- when the initial benchmarks were issued -- to the present, accounting rates have decreased for every one of the 34 countries listed.⁷ In the same period, AT&T increased its residential international direct dial ("IDD") rates for each of those countries.⁸ These statistics make clear that AT&T's assertion that the reductions in settlement rates since 1992 "have resulted in. . . lower prices for U.S. consumers" is simply not accurate.⁹ Rather, U.S. carriers, including AT&T, have themselves benefited from reduced settlement rates by increasing their profit margins instead of passing the savings along to their customers.¹⁰ For at least the past five years the net IMTS revenues retained by U.S. carriers consistently has increased. By lowering settlement rates even further, the approach proposed in the *NPRM* would simply enable U.S. carriers to increase these profit margins and their net revenues.

⁷ In this regard it should be noted that HKTU has entered into agreements with all five U.S. carriers with which it corresponds to reduce the rate again to SDR0.58 on April 1, 1997, and to SDR0.52 on April 1, 1998.

⁸ See "Trends in the International Telecommunications Industry." Industry Analysis Division, Common Carrier Bureau, FCC (Aug. 1996) at Table 11.

⁹ AT&T Comments at 9.

¹⁰ See, e.g., HKTU Comments at 11 (AT&T's collection rates increased while the accounting rate dropped 57% on the route over five years); KDD Comments at 10 (between 1990 and 1995 the settlement rate on the U.S.-Japan route dropped by 53% while AT&T's IDD rates on that route increased by 13%); Telecom Italia Comments at 4 (over the past four years Telecom Italia has reduced accounting rates by 80% while the operating margins of U.S. carriers on calls to Italy range from 60%-80%); Telmex Comments at 13-14 (from 1990 to 1997 the settlement rate on the U.S.-Mexico route dropped from \$0.779 to \$0.395 while AT&T's IDD rates to Mexico increased from \$0.9661 to \$1.1316); Telstra Comments at 4-5 (noting that the U.S.-Australia rate has decreased by 44% in the past three years, but AT&T increased its IDD rate for calls to Australia in both 1993 and 1995).

The record supports HKTI's suggestion that in order to achieve its goal of ensuring that U.S. consumers have access to high quality international telecommunication service at reasonable rates, the Commission should focus directly on the collection rates charged by U.S. carriers to U.S. consumers.¹¹ Requiring that dramatically above-cost IDD rates be reduced to, for example, TSLRIC-based rates, would send a clear signal to the rest of the world that the Commission is genuinely concerned about lowering prices for consumers. As HKTI recommended in its Comments, rather than imposing benchmarks upon settlement rates, the Commission should implement benchmark collection rates.¹² Alternatively, the FCC could require U.S. carriers to lower collection rates by a percentage equal to the reduction in accounting rate levels of the last five years. Only actions like these, targeted directly at the rates charged by U.S. carriers to U.S. consumers, will benefit U.S. consumers.

III. CONDITIONING AUTHORIZATIONS ON COMPLIANCE WITH BENCHMARKS TO ADDRESS POTENTIAL ANTI-COMPETITIVE BEHAVIOR BY FOREIGN CARRIERS IS UNWARRANTED

The record shows that the proposal in the *NPRM* to require foreign-affiliated U.S. facilities-based carriers to comply with the benchmark rates as a condition to entry into the U.S. market is not warranted. As many parties have remarked, imposing market-entry conditions on foreign carriers is inconsistent with the Most Favored Nation and National Treatment principles embodied in the WTO Agreement.¹³ It cannot reasonably be argued

¹¹ Such an approach would also avoid the jurisdictional problems that plague the *NPRM*, which were discussed in detail in HKTI's Comments, and in the comments of many other parties, as noted below.

¹² See HKTI Comments at 21.

¹³ The Results of the Group on Basic Telecommunications Services on the World Trade
(continued...)

that the approach in the *NPRM* does not constitute market entry controls.¹⁴ Conditioning the use of an authorization would have precisely the same practical effect as conditioning an authorization itself, in contravention of the U.S. commitment under the WTO Agreement. In either case, a foreign carrier cannot provide IMTS service. Also, conditioning service authorizations on compliance with the proposed benchmarks would discriminate among providers of similar services from different countries.

Moreover, the Commission's concerns that above-cost accounting rates provide a subsidy enabling foreign monopoly carriers to fund anticompetitive activities through U.S. affiliates is unfounded. There is no evidence in the record indicating that any foreign carriers are receiving such transfer payments, and any potential anticompetitive behavior by foreign carriers is inherently speculative.

While many countries have a legitimate interest in adopting laws that address anticompetitive behavior, such laws should be enforced only in cases of actual violations of any such laws. A blanket *a priori* approach as proposed in the *NPRM* is overbroad and over-inclusive, in the sense that "guilt" is assumed until compliance with the settlement

¹³(...continued)

Organization General Agreement on Trade in Services, February 15, 1997 (the "WTO Agreement"); *see, e.g.*, GTE Comments at 28-33; Government of Japan Comments at 2; KDD Comments at 25-27; Telintar Comments at 19-23. Now that the WTO Agreement has been signed, and its effective date is imminent, these issues are of real concern. The European Commission and other government agencies have the right to challenge any such conditioning through the dispute mechanisms of the WTO. Indeed, several administrations, including the European Commission, have expressly reserved their rights to challenge under the WTO any of the *NPRM*'s proposals that are inconsistent with GATS obligations. EU Comments at 1; *see also* P&T, China Comments at 3.

¹⁴ *NPRM*, ¶ 82.

benchmarks is demonstrated. There is simply no nexus between the enforcement mechanisms proposed in the *NPRM* and the problems the Commission seeks to address.

The approach of the United Kingdom towards addressing anticompetitive behavior by affiliated carriers provides a useful model in this regard. As noted in its Comments, the government of the U.K. in its licensing of ISR has established a prohibition on anticompetitive behavior, and has maintained reserve powers to enforce this prohibition. However, in all the time that ISR has been operational in the U.K., there has not been even one instance of one-way bypass, and hence the U.K. government has not found it necessary to exercise its enforcement powers.¹⁵ The experience of the U.K. demonstrates that effective, less-restrictive approaches to protection against anticompetitive behavior are available.

In summary, the approach proposed in the *NPRM* cannot be justified as necessary to protect against anticompetitive behavior. No direct connection has been or can be shown between the presumed harm and proposed remedy, and less-restrictive and better-targeted enforcement measures are available. Moreover, the Commission's approach has the effect of limiting entry into the U.S. market and will only impede the growth of competition in the IMTS market, thereby disserving the Commission's stated goals in this proceeding.¹⁶

¹⁵ United Kingdom Comments at 2.

¹⁶ In addition, AT&T argues that the benchmarks are necessary because in cases where carriers in foreign multicarrier environments maintain identical accounting rates, U.S. carriers are hindered in their ability to negotiate lower settlement rates. AT&T Comments at 13. AT&T significantly overstates this issue. First, consistent with the U.S. Uniform Settlements Policy, parallel accounting has been established in many multicarrier jurisdictions in order to avoid the very anticompetitive conduct by affiliated carriers that AT&T decries. Second, parallel accounting rates in multicarrier environments need not impede negotiations for lower accounting rates where, as in Mexico, one entity is designated as the negotiating carrier. *See, e.g.,* (continued...)

IV. THE FCC DOES NOT HAVE THE AUTHORITY TO ESTABLISH INTERNATIONAL ACCOUNTING RATES UNILATERALLY

As many commenters have noted, international law, as articulated in the ITU Constitution and Regulations, requires that accounting rates be determined on a bilateral basis, by "mutual agreement."¹⁷ Commenters also argue overwhelmingly that the FCC does not have plenary jurisdiction over the rates charged by foreign carriers to terminate U.S.-billed international switched traffic in their own countries.¹⁸ Regardless of how the benchmark proposals are described in the *NPRM*, commenters agree that the Commission effectively seeks to establish a foreign carrier's rate for service offered in a foreign country.¹⁹ The record plainly establishes that the Commission's proposal transgresses the

¹⁶(...continued)

International Long Distance Service Rules of the Mexican Ministry of Communications Transport, adopted December 4, 1996. Finally, where certain unique circumstances exist in multicarrier environments, the FCC has indicated a willingness to approve alternative settlement arrangements. *See Policy Statement on International Accounting Rate Reform*, 11 FCC Rcd 3146, 3148 (1996).

¹⁷ *International Telecommunications Regulations*, Article 6.2.1 (Melbourne, 1988).

¹⁸ *See, e.g.*, Hispanic-American Association of Research Centers & Telecommunications Companies ("AHCIAET") Comments at 2-3; CANTO Comments at 1; C&W Comments at 2-15; Chunghwa Telecom Comments at 2; COMTELCA Comments at 13-15; Cooperation Council for the Arab States of the Gulf Comments at 1-2; DGT, Taiwan Comments at 1-2; Deutsche Telecom Comments at 5-9; GTE Comments at 10-15; Government of Japan Comments at 1-2; HKTIC Comments at 21-26; Indosat Comments at 1; International Digital Communications at 2; International Telecom Japan Comments at 3-12; KDD Comments at 2-7; P&T, China Comments at 1-2; Panama Comments at 17-21; RPOAs of the Republic of Korea Comments at 2, 4; Singapore Telecom Comments at 2-3; Solomon Islands Comments at 1; Telecom Vanuatu Comments at 1; Telefónica del Perú Comments at 6-9; Telintar Comments at 11-30; Telmex Comments at 18-20.

¹⁹ *See, e.g.*, C&W Comments at 8; CANTO Comments at 3; Jabatan Telekom Malaysia Comments at 2; Indosat Comments at 1; Panama Comments at 17; Telefónica del Perú Comments at 6-8; Telintar Comments at 7-9.

rights of foreign governments to regulate telecommunications within their own territorial markets.

Similarly, foreign governments have a legitimate interest in and right to advance their chosen social policies, which in many cases may differ from those policies favored by other countries. The FCC does not have the right to dictate to foreign administrations what telecommunications policy objectives they may promote, regardless of whether the Commission agrees with those policies. As many commenters note, the Commission's proposal in the *NPRM* to impose accounting rate cost methodologies and benchmarks entirely disregards the complexity of the issue of allocation of joint and common costs to achieve various legitimate policy objectives, such as universal service, economic efficiency, and tariff balancing.²⁰ For example, the government of Hong Kong requires that a delivery fee of HK\$2.23 (approximately US\$0.29) be paid for every inbound minute to local carriers, including those utilizing callback. This delivery fee is intended as a source of cross-subsidy for local network development. The unilateral action proposed by the Commission in the *NPRM* ignores these rights and interests, and only maximizes political resistance to the *NPRM*'s ultimate objectives.²¹ Disagreements between nations regarding policy objectives

²⁰ See, e.g., C&W Comments at 10-15; CANTO Comments at 4-5; COMTELCA Comments at 11-12; France Telecom Comments at 13-14; GTE Comments at 15-22; Indosat Comments at 2; Pacific Islands Telecommunications Association Comments at 2; Saint Vincent and the Grenadines Comments at 1; Solomon Islands Comments at 2; Telecom Vanuatu Comments at 2; Telefónica Internacional de España Comments at 40-49.

²¹ See, e.g., International Telecom Japan Comments at 19; P&T, China Comments at 2-3 ("...China Telecom will never accept any unilaterally stipulated 'benchmark' settlement rates and 'transition period.' Also, China Telecom will reserve the right to take certain countermeasures provided the FCC insists on doing so.")

that may have a detrimental extraterritorial effect must be addressed and resolved through bilateral negotiation.²²

Rather than fanning the flames of resistance, the Commission should capitalize on the stated willingness of many administrations and carriers to discuss seriously accounting rate reforms. The issues with which the Commission is concerned, and which the *NPRM* purports to address, are best resolved in a multilateral forum where a broad consensus can be obtained, thereby ensuring that reform efforts will have a lasting and meaningful effect. The appropriate forum for comprehensive reform of international accounting rates and settlement practices is the ITU. As HKTII noted in its Comments, in November 1996 the Secretary General of the ITU called for contributions towards the debate on accounting rate reform. The collection of these contributions was to be completed in March 1997, and work will progress through Study Group 3, which has its next meeting in May 1997. Study Group 3 expects to have tangible results of its work by the end of 1997. In addition, various administrations have suggested that the ITU expand its efforts in this regard, by, for example, conducting a survey of its members as to (i) the timing and methodology adopted by Recommendation D.140, and (ii) interconnection/policy issues that influence termination charges.²³ Many carriers support the work of the ITU on this issue and have stated a

²² For example, if it could be demonstrated that foreign telecommunications policies that involve cross-subsidization have some detrimental impact upon U.S. consumers, the problem of cross-subsidies must be dealt with by negotiations between the governments involved.

²³ In addition, truly comprehensive reform of the current settlements system must include consideration of the impact on traditional network provisioning of new technologies such as the Internet, which allow carriers to bypass existing switching and regulatory frameworks. See Telstra Comments at 3. Another issue which should be considered is that accounting rate revenues are often factors in equipment supply contracts with certain U.S. carriers. See, e.g., Sri Lanka Telecom Comments at 1.

(continued...)

preference to work multilaterally within this framework.²⁴ As a signatory to the ITU convention, the U.S. has certain obligations to do the same.

HKTI respectfully suggests that the Commission continue its reform efforts, but through the ITU. Accounting rate reform sponsored by the ITU will take into consideration the interests and concerns of all countries, which in turn will inevitably produce a result that is far more acceptable on a global basis than the unilateral approach of the *NPRM*. Finally, HKTI submits that the ITU is best situated to craft a solution to the accounting rate issue that is consistent with the WTO Agreement and avoids the problems identified above.

²³(...continued)

Unilateral cuts in accounting rates would have a substantial and disruptive effect on existing supply agreements, and on the ability of carriers to fulfill their contractual obligations. The *NPRM* does not address these important issues.

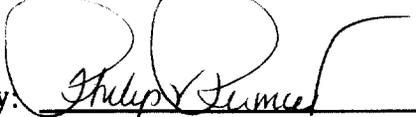
²⁴ See, e.g., CANTO Comments at 2; C&W Comments at 2; COMTELCA Comments at 13-15; Cooperation Council for the Arab States of the Gulf Comments at 1; Deutsche Telecom Comments at 8-9; France Telecom Comments at 8-9; GTE Comments at 34; Government of Japan Comments at 1-2; Indosat Comments at 1; International Digital Communications at 7; International Telecom Japan Comments at 6-9; KDD Comments at 13; P&T, China Comments at 2; Portugal Telecom International Comments at 10-13; SBC Communications Comments at 4-5; Singapore Telecom Comments at 2; Telefónica del Perú Comments at 13; Telia Comments at 3-5; Videsh Sanchar Nigam Limited Comments at 3-4.

V. CONCLUSION

For the foregoing reasons, HKTI urges the FCC not to adopt the *NPRM's* proposals and instead to work to achieve meaningful reform through established multilateral channels.

Respectfully submitted,

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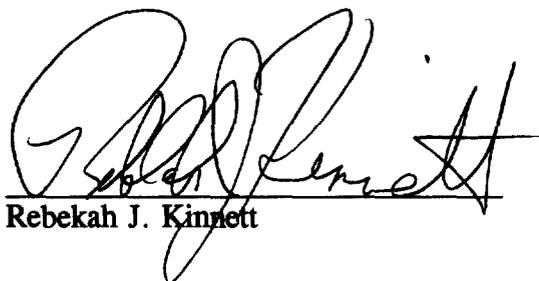
I, Rebekah J. Kinnett, hereby certify that I have served a copy of the foregoing
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