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NYNEX

July 9, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Re: In the Matter of the 1997 Annual Access Tariff Filings, CC Docket No. 97-149

Dear Mr. Caton:

Today, Mr. Bill King, Ms. Kathy Richards, Mr. Pat Finnegan, Mr. Tom Gilberg, Mr. Jack Moy, Mr. Ken Rust, Mr. Joe DiBella, Mr. Alan Cort and myself, representing NYNEX, spoke via conference call with Mr. John Scott and Ms. Josphine Simmons from the Competitive Pricing Division of the FCC regarding the above-captioned proceeding.

NYNEX responded to a question from the FCC staff concerning the factors that led to the growth rate for minutes of use filed in the 1997 annual access filing. The discussion was consistent with NYNEX's comments contained in its Reply to Comments on NYNEX TRP Filing, filed April 30, 1997

The attached documents, which were referred to on the call, were faxed to Ms. Simmons per her request.

Sincerely,



Attachment

cc: Mr. Scott
Ms. Simmons

No. of Copies sent
List Attached

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PSC
Order

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STATE OF NEW YORK
 PUBLIC SERVICE COMMISSION

At a session of the Public Service
 Commission held in the City of
 Albany on August 1, 1995

COMMISSIONERS PRESENT:

Harold A. Jerry, Jr., Chairman
 Lisa Rosenblum
 William D. Cotter
 John F. O'Mara

CASE 94-C-0715 - Complaint of AT&T Communications of New York,
 Inc. Against New York Telephone Company
 Concerning Alleged Improper Application of
 InterLATA Access Minutes of Use Rates to
 IntraLATA Switched Access Service.

ORDER GRANTING COMPLAINT

(Issued and Effective August 25, 1995)

BY THE COMMISSION:

INTRODUCTION

AT&T Communications of New York, Inc. (AT&T) has complained that New York Telephone Company (NYT) violated NYT's tariff by charging AT&T interLATA switched access rates for intraLATA service. We conclude that NYT has violated its tariff by not using AT&T reports on the jurisdiction of intraLATA calls whose origin NYT cannot directly determine. NYT will be directed to accept AT&T's reports, and to provide AT&T a credit, plus interest, back to January 1993, when AT&T began filing the reports.

BACKGROUND

In Case 28425,^{1/} we established a rate-differential between the intraLATA and interLATA switched access service NYT

^{1/} Case 28425, Opinion and Order Prescribing Rules for Intrastate Carrier Access Charges, Opinion No. 83-25 (issued December 6, 1983).

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provides interexchange carriers.^{1/} To apply this differential, NYT's access tariff provides that it multiplies an interexchange carrier's total switched access usage by an interstate-intrastate factor, (the Percent Interstate Usage or "PIU" factor), to compute interstate and intrastate access minutes of use. NYT then multiplies the intrastate minutes of use by an interLATA-intraLATA factor (the Local Usage Percentage or "LUP" Factor) to calculate interLATA and intraLATA access minutes of use.^{2/}

As a result of the wide availability of equal access, ("Feature Group D Switched Access Service" or "Feature Group D"), NYT can determine the jurisdiction of most calls by comparing the calling telephone number with the called telephone number, and then computing PIU and LUP factors. AT&T's complaint concerns interpretation of tariff language governing billing for Feature Group D when NYT cannot determine the jurisdiction of a telephone call.

RELEVANT TARIFF LANGUAGE

NYT's access tariff, Section 2.3.14(A)(3) states in pertinent part that:

For Feature Group D originating access minutes, the projected intrastate interLATA percentage will be developed on a monthly basis by end office when the Feature Group D Switched Access Service access minutes are measured by dividing the measured intrastate interLATA originating access minutes (the access minutes where the calling number is in one LATA and the called number is in another LATA) by the total originating intrastate access minutes when the call detail is adequate to make such determination.

^{1/} IntraLATA day charges for switched access are 24¢ lower than the interLATA day period charges, and time of day discounts are greater for intraLATA switched access charges than for interLATA charges, so the difference between intraLATA and interLATA switched access charges ranges from 24¢ to 62¢.

^{2/} P.S.C. No. 913 - Telephone tariff, Section 2.3.14.

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For terminating access minutes, the data used by the Telephone Company to develop the projected intrastate interLATA percentage for originating access minutes will be used to develop projected intrastate interLATA percentage for such terminating access minutes.

When a customer orders Feature Group D Switched Access Service, the customer shall supply a projected intrastate intraLATA percentage of use for each end office involved to be used in the event that originating call details are insufficient to determine whether the call is interLATA or intraLATA.

This percentage shall be used by the Telephone Company as the projected intrastate intraLATA percentage for such call detail. For the purposes of developing the projected intrastate intraLATA percentage the customer shall utilize the same considerations as those set forth in (1)(b) preceding. The Telephone Company will designate the number obtained by subtracting the projected intrastate intraLATA percentage for originating and terminating access minutes from the designated intrastate percentage as the projected intrastate interLATA percentage of use.

AT&T ACCESS BILLING COMPLAINT

Until 1993, both AT&T and NYT accepted NYT's use of measured originating access minutes for all billings service under the Feature Group D switched access tariff.^{2/} This acceptance was based on a mutual assumption that AT&T's intraLATA usage was insignificant.

The introduction of 800 calling services, which include incidental intraLATA usage, changed AT&T's assumed level of intraLATA usage significantly. Since NYT could not determine the

^{2/} "Measured" access minutes are those for which NYT is able to determine jurisdiction, i.e., whether the traffic is intrastate interLATA or intrastate intraLATA.

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jurisdiction of 800 calls, AT&T began filing jurisdictional reports for these calls on a quarterly basis beginning January 1, 1993. AT&T's jurisdictional reports were not accepted and its offers to allow NYT to audit its records were refused.

On September 1, 1994, AT&T complained that NYT should (1) adhere to the tariff and use LUP factors provided by the interexchange carrier when NYT cannot determine call jurisdiction; (2) issue a credit for NYT's application of interLATA rates to intraLATA usage since January 1, 1993 in violation of the tariff; and (3) bill the proper tariffed rates for all ongoing intraLATA switched access purchased from NYT. As of January, 1995, AT&T had withheld payment of \$12 million for alleged overbilling from January, 1993.

NYT's Position

In a January 24, 1995 letter, NYT states that its Feature Group D tariff requires it to calculate the intrastate interLATA percentage usage factor for each customer by (1) dividing measured intrastate interLATA originating access minutes by total measured intrastate originating access minutes and then (2) subtracting the resulting intrastate interLATA percentage usage from 100% to determine the intraLATA/interLATA split (the LUP factor). NYT claims its tariff does not permit it to accept LUP factors provided by customers, except when there are no originating minutes of use for the carrier -- for example, when a carrier is just beginning service or taking new service arrangements for switched access.

The effect of the NYT interpretation is to apply higher interLATA rates to arguably intraLATA usage, if the jurisdictional split of the unmeasured usage (i.e., indeterminate jurisdiction) is substantially different than the jurisdictional split of the measured usage used to calculate the LUP factors. NYT claims, however, that there is nothing nefarious in calculation of factors based on traffic it can measure. It observes that in the case of Feature Group D, jurisdiction cannot

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be determined for originating 800 traffic, for example, because it is impossible to determine if the call terminates across the street or across the country.

NYT notes that if credits for 800 and 900 calls were required for all Feature Group D customers retroactive to 1993, NYT's cost would exceed \$20 million. It claims that there are financial incentives for interexchange carriers to manipulate reported billing factors and that, at a minimum, the auditability of such customer-supplied factors must be addressed in any new methodology.

In addition, NYT argues that no customer had previously asserted that the NYT tariff provisions permitted customers to provide LUPs for Feature Group D traffic. NYT also claims that the Commission must protect the interests of the smaller Feature Group D customers, who may not have mechanized systems to gather reliable data in a cost-effective way.

Further, NYT notes that AT&T's claim is addressed solely to the LUP, but that the tariff uses the same methodology for calculating the PIU factor used to calculate intrastate and interstate switched minutes of use. NYT argues that if changes are made to allow customer reporting of the LUP, then parallel changes should be considered for the PIU.

Finally, NYT argues that any order by the Commission requiring it to provide a credit to AT&T would clearly constitute retroactive ratemaking. NYT alleges that its current rates are based upon AT&T testimony that most of AT&T's in-state calling is interLATA in nature. NYT argues that the Commission cannot now require NYT to provide a credit to AT&T, in violation of the NYT tariff, based on AT&T's current, contradictory assertions that NYT has understated AT&T's intraLATA traffic.

AT&T's Position

AT&T's response, dated February 9, 1995, construes NYT as arguing that 1) the tariff requires use of an incorrect method for calculating intraLATA minutes of use, and 2) that AT&T is

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insisting that NYT modify its tariff. AT&T asserts that it is instead demanding that NYT comply with the tariff as written.

AT&T contends that by its express terms the first paragraph of Section 2.3.14(A)(3), quoted above, applies only when call detail can be "measured," and that where call detail is inadequate, the third paragraph of Section 2.3.14(A)(3), quoted above, provides that the carrier will project an intraLATA/interLATA split. AT&T asserts that NYT is unable to "measure," AT&T intraLATA minutes of use for 800 and 900 services within the meaning of the tariff, and that since January 1993 AT&T has provided NYT with projected intraLATA usage factors on a quarterly basis for billing as contemplated by the tariff. AT&T replies to NYT's interpretation that customer provided data will be used only where there are no originating minutes of use, by arguing that the tariff contains no such limitation, but states that customer-provided detail will be used whenever "originating call details are insufficient to determine whether the call was interLATA or intraLATA."

AT&T argues that the tariff is clear, that NYT must bill according to the tariff and that claimed revenue shortfalls do not justify misbilling of customers. It challenges NYT's assertion that NYT may owe in excess of \$20 million to other carriers, on the grounds that NYT has offered no evidence that other carriers have similar usage patterns and could assert claims back to the date AT&T asserted its claim. AT&T argues that, in any event, since NYT took no corrective action when AT&T filed its data, it cannot argue that it is entitled to systematically misbill intraLATA minutes of use at interLATA rates. AT&T also claims, in the alternative, that (1) any ambiguity in NYT's tariff must be resolved against NYT, and (2) NYT had an obligation to modify its tariff when shown it was systematically misbilling intraLATA minutes of use at interLATA rates.

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AT&T responds to NYT's argument that no carrier complained previously by noting that an industry understanding cannot be used to obviate the plain language of the tariff. In addition, it argues that a better understanding of the history of this issue is that no party raised any concern until the growth of intralATA 800 and 900 services made NYT's method grossly erroneous.

AT&T further asserts that there is no evidence that smaller Feature Group D customers will be harmed in any way by AT&T's request that it be billed properly, but that the proper solution would be for NYT to change its tariff to accommodate such carriers. AT&T agrees with NYT's assertion that the same method should be used to calculate LUP and FIU, and states that it has unsuccessfully urged NYT to modify FIU determinations.

AT&T responds to NYT's argument that NYT's current rates were based upon AT&T testimony by stating that while AT&T testified that most of its in-state calling is interLATA, its acceptance of different rates for intralATA and interLATA access did not authorize NYT to incorrectly bill AT&T for intralATA minutes of use. AT&T claims that NYT was fully aware at the time of the testimony of the split between AT&T's in-state usage and that there is no support for NYT's assertion that the Commission relied upon AT&T's testimony.

DISCUSSION

As AT&T argues, the issue in this proceeding is the proper interpretation of NYT's tariff and the methodology that the tariff requires. More specifically, AT&T's claim raises a billing dispute arising from NYT's alleged misapplication of its tariff.

It appears that AT&T is correct in its reading of the tariff. The relevant portion of tariff Section 2.3.14(A)(3) (the first paragraph quoted above and requoted here), states that:

"For Feature Group D originating access minutes, the projected intrastate interLATA percentage will be developed on a monthly

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basis by end office when the Feature Group D Switched Access Service access minutes are measured by dividing the measured intrastate interLATA originating access minutes... by the total originating intrastate access minutes when the call detail is adequate to make such a determination. (Emphasis added)

Thus, by its express terms, this portion of the tariff applies only when the call detail upon which this methodology relies can be measured.

There is no dispute about the meaning of measured minutes -- NYT and AT&T both agree that measured access minutes are those as to which NYT is able to determine jurisdiction, i.e., whether the traffic is intrastate interLATA or intrastate intraLATA. In this proceeding there is also no dispute that the jurisdiction of 800 and 900 calls cannot be measured by NYT. Thus, this paragraph of the tariff, which requires that call detail be adequate to make a jurisdictional determination, is inapplicable.

The third paragraph quoted above, and requested here, sets forth the procedure to be used when the call detail is inadequate to make a jurisdictional determination:

"When a customer orders Feature Group D Switched Access Service, the customer shall supply a projected intrastate intraLATA percentage of use for each end office involved to be used in the event that originating call details are insufficient to determine whether the call is interLATA or intraLATA. This percentage shall be used by the Telephone Company as the projected intrastate intraLATA percentage for such call detail. (emphasis added).

Contrary to NYT's assertion, this paragraph does not limit the use of customer-provided LTPs to situations where there are no originating minutes of use on which to base the calculations required by NYT's tariff. Rather, AT&T is correct that the specific language of the tariff states that customer-provided data will be used where originating call details are insufficient

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to make the necessary jurisdictional determinations, i.e., where the call details cannot be measured.

NYT appears to believe that AT&T is seeking to change the methodology the tariff requires for calculating the LUP because the present methodology is unfair and overstates access charges that AT&T must pay to NYT due to AT&T's increased intralATA usage. Thus, many of NYT's arguments are premised on its perception that it must refute the reasons why the tariff must be changed to incorporate a better or more accurate methodology.

NYT's arguments miscarry somewhat inasmuch as the issue is construction of the current tariff. Some of its arguments, particularly the reliance on past industry practice, might be germane if the tariff were ambiguous and extrinsic evidence was needed to construe it.^{2/} However, the tariff is not ambiguous, so we need not address NYT's arguments in detail. We need only note that since this is a billing dispute, our decision is limited to the facts and circumstances presented herein; NYT's concerns about claims other carriers might raise and whether those carriers are in the same position as AT&T will be considered should those carriers complain. In addition, NYT's claim that adoption of AT&T's proposal would be retroactive ratemaking is incorrect. We are not changing rates or otherwise affecting rate levels, but are dealing with a customer's complaint as to whether it was billed under the proper rate provision of its tariff.

Further, as AT&T points out, other NYT contentions, such as those about the protection of NYT's interests and those of other Feature Group D customers, or about the need to revise PIU calculation, really go to whether the tariff should

^{2/} See Case 94-C-0894 - Glens Falls Communications Corp., Appeal from informal hearing in favor of New York Telephone, Commission Determination (Issued August 9, 1995) [use of industry practice where tariff is ambiguous].

appropriately be modified. That question is not before us on this billing complaint.

AT&T has provided quarterly LUPs to NYT pursuant to the terms of NYT's tariff. To the extent NYT disputes the validity or accuracy of the AT&T-supplied LUPs, it had ample opportunity to inspect and audit those percentages as provided by tariff section 2.3.14(b).^{1/} It chose instead to ignore them by applying an incorrect interpretation of its tariff. Therefore, AT&T's requested relief should be granted.

It should be realized that local exchange companies, such as NYT, will be competing with services supplied by interconnected companies insofar as those companies gain intraLATA presubscription capabilities. If this competition is to be fair, the interexchange carriers must be charged the correct intraLATA rate by NYT. NYT's application of the tariff has been defective, and thus it must credit AT&T Communications for any past overpayments, plus interest.

The Commission Orders:

1. Pursuant to its tariff, P.S.C. No. 913 - Section 2.3.14(a)(3) New York Telephone Company shall base billing for intraLATA switched access service provided AT&T Communications of New York, Inc. on AT&T supplied jurisdictional reports when New York Telephone Company cannot directly determine the jurisdiction of a call.

2. New York Telephone Company shall, pursuant to the tariff, recalculate intraLATA access charges for AT&T Communications, Inc., from January 1993 to the present on those calls for which New York Telephone Company cannot directly determine the jurisdiction, using the jurisdictional reports that AT&T supplied from January of 1993 to the present.

3. New York Telephone Company will credit AT&T Communications, Inc. for any past overpayments in violation of

^{1/} See Case 94-C-0894, SHRKA, at 20, n. 17, [NYT's tariff read to give it an effective right to audit].

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the tariff, with interest, and provide proof that it has done so within thirty days of the date of this order.

4. This proceeding is continued.

By the Commission,

(SIGNED)

John C. Crary
Secretary

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Tariff Filing

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New York Telephone

A NYNEX Company

1095 Avenue of the Americas
New York, New York 10036
Phone (212) 395-6190
Fax (212) 768-7568

Sandra Dilorio Thom
Counsel
Legal Department

October 2, 1995

Honorable John C. Crary
Secretary, Public Service Commission
State of New York
Three Empire State Plaza
Albany, New York 12223

Re: Case 94-C-0715

Dear Secretary Crary:

The following schedule, issued by New York Telephone Company ("the Telephone Company"), is transmitted for filing in accordance with the requirements of the Public Service Commission, State of New York, to be effective November 10, 1995.

P.S.C. No. 913 - Telephone	
4th Revised Page 20	2nd Revised Page 20.4.2
4th Revised Page 20.1	1st Revised Page 20.5
3rd Revised Page 20.2	7th Revised Page 21
3rd Revised Page 20.3	2nd Revised Page 21.1
1st Revised Page 20.3.1	4th Revised Page 22
4th Revised Page 20.4	Original Page 22.1
5th Revised Page 20.4.1	Original Page 22.2

This filing is made pursuant to the Commission's Order Granting Complaint of August 25, 1995 in the above-captioned case. The proposed tariff revisions provide for changes to the Jurisdictional Report Requirements section of the tariff to require customers to provide multiple percentages of intrastate intraLATA use (LUP factors) by Feature Group and Call Type and multiple percentages of interstate use (PIU factors) by Feature Group and Call Type for certain Switched Access Services, which will be used by the Telephone Company to apportion the usage, recurring and/or nonrecurring charges by rate element among interstate, intrastate intraLATA and intrastate interLATA jurisdictions when the jurisdiction of a call cannot be determined from the call detail recorded by the Telephone Company (i.e., when the jurisdiction of the calling and called parties cannot be determined from the Telephone



NYNEX Recycles

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Company's call records). In addition, the revisions provide the Telephone Company an enhanced ability to audit customer-provided information to help ensure the accuracy of billing information.

The Company is arranging for newspaper publication of notice of these revisions, and proof of publication will be forwarded to you in due course.

Copies of this filing are being sent to all active parties in Case 94-C-0715.

Very truly yours,



Attachment

cc: All Parties to Case 94-C-0715

P.S.C. No. 913—Telephone

New York Telephone Company

4th Revised Page 20.1
Superseding 3rd Revised Page 20.1

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.14 Jurisdictional Report Requirements (Cont'd)

(A) Report Requirements (Cont'd)

- (3) When the call detail recorded by the Telephone Company is adequate to determine the appropriate jurisdiction of the Switched Access usage (i.e., when the jurisdiction of the calling and called parties can be determined from the Telephone Company's call records), the customer reported jurisdictional information will not be used for those calls. Instead, the usage will be directly assigned to the appropriate jurisdiction based on the Telephone Company's recorded call detail. (C)
- (4) For purposes of developing the projected PIUs, the customer shall consider every call that enters the customer's network at a point within the same state as the state where the called station is located to be intrastate and every call that enters the customer's network at a point in a state different from the state in which the called station is located to be interstate. (C)
 For purposes of developing the projected intrastate intraLATA LUPs, the customer shall consider every call that enters the customer's network at a point within the same state and LATA as the state and LATA where the called station is located to be intrastate intraLATA and every call that enters the customer's network at a point within the same state but in a different LATA from the LATA in which the called station is located to be intrastate interLATA. (C)
- (5) The customer shall compute the PIU for each Feature Group and Call Type by dividing interstate access minutes for that Feature Group and Call Type by total access minutes for that Feature Group and Call Type. (C)
 The customer shall compute the LUP for each Feature Group and Call Type by dividing intrastate intraLATA access minutes for that Feature Group and Call Type by total intrastate access minutes for that Feature Group and Call Type. (C)
 The computations for "Originating" and "Terminating" Call Types shall include only those access minutes for which a lower level PIU and LUP is not required as set forth in 2.3.14(A)(1) preceding. For example, the "Originating Feature Group D" PIU and LUP computations shall include all Feature Group D originating access minutes other than 700, 800 and 900 access minutes. (C)

Issued: October 2, 1995

Effective: November 10, 1995

By Sandra DiIorio Thorn, General Attorney

1095 Avenue of the Americas, New York, N.Y. 10036

P.S.C. No. 913--Telephone

New York Telephone Company

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Superseding 2nd Revised Page 20.2

ACCESS SERVICE

2. General Regulations (Cont'd)2.3 Obligations of the Customer (Cont'd)2.3.14 Jurisdictional Report Requirements (Cont'd)

- (A) Report Requirements (Cont'd) (C)
- (6) In the event a customer fails to report the PIU and/or LUP for Originating 700, Originating 800, or Originating 900 Call Type(s) for any Feature Group(s) as required in 2.3.14(A)(1) preceding, the Telephone Company will use the "Originating" PIU and/or LUP reported for such Feature Group(s) to apportion such usage until the customer provides the required data at a regularly scheduled update as provided in 2.3.14(B) following. (C)
(C)
(C)
(C)
(C)
(C)
(C)
- In the event a customer fails to report the PIU and/or LUP for Terminating 800, Terminating Directory Assistance or Terminating Mass Announcement Service Call Type(s) for any Feature Group(s) as required in 2.3.14(A)(1) preceding, the Telephone Company will use the "Terminating" PIU and/or LUP reported for such Feature Group(s) to apportion such usage until the customer provides the required data at a regularly scheduled update as provided in 2.3.14(B) following. (C)
(C)
(C)
(C)
(C)
(C)
- (7) PIUs and LUPs are to be reported by the customer in whole numbers on a Billing Account Number, LATA, or end office basis. (C)
(C)
- (8) In the event that the projected PIUs and/or LUPs provided by the customer when initially ordering Switched Access Services change prior to the date upon which the Telephone Company provides service to the customer, the customer shall report the change(s) to the Telephone Company prior to service completion. (C)
(C)
(C)
(C)
(C)
- (9) For purposes of implementation, the customer is required to update its jurisdictional report in conformance with the regulations contained herein, for the impending quarter as set forth in 2.3.14(B)(1) following. If less than 30 calendar days exist from the effective date of this tariff to the impending quarter, the customer is required to update its report for the next ensuing quarter. If a customer fails to update its jurisdictional report as required for purposes of implementation, until the customer updates its jurisdictional report as set forth in 2.3.14(B)(1) following, the Telephone Company will apply to all Call Types within each Feature Group the PIU and LUP factors that were applied to each Feature Group in the last full three-month period (beginning February, May, August or November) prior to the effective date of this provision. (C)
(C)

Issued: October 2, 1995

Effective: November 10, 1995

By Sandra DiIorio Thorn, General Attorney

1095 Avenue of the Americas, New York, N.Y. 10036

