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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Technical Requirements to Enable Blocking)
of Video Programming Based on Program)
Ratings)
)
Implementation of Sections 551(c), (d) and)
(e) of the Telecommunications Act of 1996)

ET Docket No. 97-206

To: The Commission

Date: December 18, 1997

REPLY COMMENTS OF OKTV™ (Our Kids TV)

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TABLE OF CONTENTS

I.	Introduction and Summary.....	1
II.	The principal task of the Commission in this proceeding is to rule on the essential elements of an open end-to-end communications system to be provided by television manufacturers and distributors so that parents will have convenient access to a program rating service of their choice.....	3
III.	The “common rating” characteristic of the industry rating proposal does not at present meet the common rating test of Section 303(x) of the Telecommunications Act.....	7
IV.	Objections raised by NAB <i>et al</i> and by CEMA and its members to a communications system for accommodating multiple rating services are invalid, unsubstantiated or <i>de minimis</i> , and in any event overwhelmed by the compelling government interest in child protection	9
A.	The revised industry proposal of September 10, 1997, although readily correctable, is currently more complex, costly and viewer unfriendly than the system proposed by OKTV.....	9
B.	Objections based on possibly impaired performance of TV receivers are invalid.....	10
C.	Objections based on presumed delays in realizing the goals of Section 551 are speculative and in any event can be resolved within the time required to resolve the commonality and other “acceptability” issues of the industry proposal.....	11
D.	Objections based on lack of Commission authority are clearly refutable.....	11

V.	While most characteristics of the viewer interface can be determined by market forces, a few minimum functionalities must be mandated by the Commission to assure that parents will have satisfactory access to ratings information and blocking technology.....	13
VI.	A Commission rulemaking regarding ratings for digital television should be deferred.....	14
VII.	A “positive rating” option would be inconsistent with the purposes of Section 551 and might impose performance penalties.....	15
VIII.	Patent issues raised by Toshiba need not interfere with the timely implementation of an optimal ratings communications system.....	15
IX.	Conclusion.....	16

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The Children's Television Consortium, doing business as OKTV™ (Our Kids TV) is a non-profit, non-stock Delaware Corporation approved by the Internal Revenue Service as a 501(c)3 charitable organization with principal offices at 218 West Main Street, Hyannis, Massachusetts 02601.

OKTV has previously submitted Comments and Reply Comments in CS Docket No. 97-55 (the Industry Proposal for Rating Video Programming) and Comments in this proceeding (ET Docket No. 97-206). OKTV herewith submits its Reply to Comments filed in the Commission's Notice of Proposed Rulemaking in this proceeding. These filings are incorporated herein by reference.

I. Introduction and Summary.

Based on a review of Comments received November 24 at the Commission in this proceeding, it is clear that the primary issue to be resolved is whether or not the

Commission will stand by its proposal to prescribe an open communications system to provide parents access to a multiple ratings service of their choice. Such a communications system would avail of the transmission capabilities of line 21 of the VBI to transmit multiple rating codes to TV receivers, and thereby help parents protect their children from harmful television through information and blocking technology as Congress mandated in Section 551 of the 1996 Telecommunications Act.

OKTV, many medical societies, parental groups and others have indicated full support for the Commission in this matter. However, the TV industry, both manufacturers and distributors, speak as one in adamant opposition to the Commission's proposal. In these Reply Comments, OKTV presents facts and arguments in opposition to the industry's position. The industry's reasons for opposing an open communications system for multiple ratings are not valid, unsubstantiated or *de minimis*. In any event they are overwhelmed by the benefits of giving parents a choice of services rather than providing parents access only to a monopoly ratings service dominated by commercial interests.

Secondly, OKTV for reasons set forth herein believes the Commission can and should finalize its technical prescription for the essential engineering and operational elements of an open ratings communications system before reaching a final determination in Docket 97-55 regarding content issues and whether or not the industry rating proposal overall is "acceptable." A review of filings in this proceeding indicates that NAB *et al* propose to use line 21 of the VBI in a non-hierarchical manner which is more costly and more complex than necessary in terms of its implementation by receivers, and is unnecessarily confusing from a viewer's perspective. These deficiencies need to be, and can readily be, corrected after Commission has put in place less complex and more universal rules for a hierarchical ratings communications system as recommended herein.

Further, as elaborated in Section III below, the revised proposal of NAB *et al* fails the "common rating" test required by Congress in Section 551. Without common ratings parents, in selecting criteria for program blocking, will have no assurance of just what categories of programs the "V-chip" will block.

While these issues are being resolved, there is no reason the Commission cannot adopt engineering and operational rules for a ratings communication system which will be open to both industry and independent rating services and to which an industry rating system must conform to be found "acceptable." Such an early determination will enable manufacturers to proceed with silicon implementation, and independent services to proceed with development of their services while the Commission and television distributors sort out other issues related to the "acceptability" of the industry's proposal.

By adopting rules for communicating ratings information, the Commission will define one of the two basic conditions for addressing the acceptability of the industry proposal. The second basic condition relates to content issues raised by the industry's revised proposal of September 10, 1997 and now being addressed by the Commission in Docket No. 97-55. The only content judgment the Commission needs to make in deciding whether the industry or an independent rating service qualifies for a claim to the limited data space available for rating services on line 21 is whether or not the service is narrowly tailored to meet the compelling government interest in child protection which Congress established in Section 551. Such determination can be made by the Commission while the technical requirements adopted in this proceeding are being implemented.

- II. The principal task of the Commission in this proceeding is to rule on the essential elements of an open end-to-end communications system to be provided by television manufacturers and distributors so that parents will have convenient access to a program rating service of their choice.**

The essential engineering and operational elements of an open ratings communications system can and should be sufficiently flexible to accommodate the (a.) proposed voluntary rating service of the television industry when and if the Commission finds it "acceptable" and (b.) qualified voluntary independent services that may be developed. The task in this proceeding is not to address and adopt technical requirements to transmit only the rating service which the television industry now proposes as a monopoly service. To the contrary, an industry rating service to be found acceptable must conform to the requirements of a ratings communications system prescribed by the Commission which is open to independent rating services as well as industry services.

The essential engineering and operational elements of an open ratings communications system are:

- (1) A universal data packet and transmission protocol structured to accommodate both age-related and content rating categories, for use by qualified rating services of the television industry or independent parties. EIA Standard 608 soon to incorporate EIA Standard 744 provides such capabilities for three commercial rating services: that of the television industry and MPAA, and possibly a Canadian service yet to be developed. The 744 protocol can be technically extended to accommodate seven additional services within the specifications of EIA 608 as proposed in Appendix A of OKTV Comments of November 24. At present there is no indication that more than a very few services will be developed and qualify for access to this communications system (See OKTV Comments at pp. 10-12).
- (2) A universal means to activate blocking technology in TV receivers in accordance with ratings encoded in this data packet as suggested, for

example, in EIA Recommended Practice CEB1. Minor changes in this Practice will be needed to accommodate multiple rating services.

- (3) A requirement that equipment installed at program sources to insert closed captioning, industry rating codes and other data codes also insert ratings which independent services voluntarily make available, as discussed in Section VII of OKTV Comments, pp. 15-17.
- (4) A requirement that no TV distributor may eliminate or modify rating codes inserted in line 21 as both Congress and the Commission have specified. (The proposal of NAB *et al* that local broadcasters be permitted to delete network ratings and substitute their own is inconsistent with this requirement.)
- (5) Means to accommodate rating services using either a “negative default” or “positive default” mode. Under a negative default mode only programs rated unsuitable for children will be blocked. In a “positive default” mode, all programs will be blocked except those rated as suitable for children to view. The industry proposes that only a negative default mode be provided, thus effectively foreclosing independent rating services.
- (6) A viewer interface with required minimum functionalities to enable parents (a) to select a rating service of their choice, (b) to select age-related and/or content categories for blocking, (c) to use a remote control and personal identification number, for example, to activate, override or prevent unauthorized de-activation of rating services, (d) to call up throughout a program an on-screen display of rating information encoded on Line 21, such as recommended in Comments by NAB *et al* at p. 7, and OKTV in Comments at pp. 14-15.
- (7) A requirement that any rating system employ only common ratings as Congress requires in Section 551 and as is necessary to make workable a ratings service using blocking technology in TV receivers.

Specifying a communications system to accommodate solely the current industry ratings proposal is not a purpose Congress has expressed in Section 551. Further, it is inconsistent with a number of public policies as discussed in OKTV Comments, Section III, pp. 6-10, particularly those related to competition, diversity of information and the First Amendment. For example, the industry proposes to limit the use of the "V-chip" to a negative default mode, and to prohibit use of a positive default mode which independent services will find necessary. NAB *et al* state "Programs that are not rated should not be blockable using the V-chip." It would be anti-competitive and contrary to the interests of children and parents for the Commission to prescribe technical requirements built on the industry's proposed ratings system.

Many commenters in this proceeding assume the Commission must or will "mandate" the Parental Guideline proposal of the industry or some variant of it. Section 551 mandates only that the Commission determine whether or not the voluntary industry proposal is "acceptable," and if not that it appoint a Commission to establish a rating service. The definition of acceptability has been subject to debate. OKTV believes that a rating service, whether an industry service or an independent service, should be found acceptable or qualified if it meets two basic conditions. First, a subject which presumably is being considered in Docket 97-55, is whether or not the industry proposal satisfies and is narrowly tailored to meet the compelling government interest in child protection established by Congress in Section 551. As a second basic condition it must conform to requirements of an open ratings communications system as the Commission determines in this proceeding.

A prompt decision in this proceeding should precede a final determination in Docket 97-55 whether the industry proposal is acceptable. Manufacturers can then proceed with hardware programs knowing that to qualify for insertion on line 21, rating systems must be technically compatible with the Commission's requirements for TV receivers. And programs of independent rating services such as OKTV, which have

been placed on hold pending Commission adoption of an open system for distributing rating codes, can be re-activated. There is no reason to further delay activities of manufacturers, especially manufacturers of set-tops, and of independent rating services pending resolution in Docket 97-55 of all issues related to the acceptability of the industry proposal.

III. The "common rating" characteristic of the industry rating proposal does not at present meet the common rating test of Section 303(x) of the Telecommunications Act.

The amended Telecommunications Act requires that television receivers "be equipped with a feature designed to enable viewers to block display of all programs with a common rating . . ." Unless a given rating system uses common rating criteria, parents in selecting rating categories of that system will have little assurance that content they want blocked will in fact be blocked by the "V-chip." And unless this provision of the law is firmly enforced by the Commission, parental empowerment will be substantially weakened, thus frustrating Congress' intent, Section 551 (a)(9).

The industry's Parental Guidance proposal presently fails to meet this test of commonality in four respects. First, as several commenters have noted, the networks are not applying the industry's proposed rating standard on a consistent basis across all networks. The industry asserts that the Monitoring Board, which it proposes to organize and which is to include a minority of five parental members, will bring consistency to ratings. However, it is not unreasonable to question this optimism because each competing network is primarily responsive to its own viewers, advertisers and shareholders, presenting a diversity of private interests which tend to work against a "common rating" service. Operating experience with "in-video" icons, which the industry began using October 1, can establish whether or not the industry has corrected such deficiencies.

Second, NAB *et al* in Comments in this proceeding have re-emphasized their position that any local TV station should be able to eliminate a network rating in favor of whatever rating the station may choose to insert on line 21. In other words, in a given metropolitan area commonality of rating among local broadcasters is not assured, and parents will be unable to know just what content a given rating will block.

Third, the lack of a hierarchical structure in the industry's rating scheme leaves many uncertainties for parents. For example, does a "V" description added to TV-PG mean that TV14 and TV-MA are automatically blocked, or not? And how do the separate child audience levels (TV-Y and TV-Y7) relate to the four general audience levels (TV-G, TV-PG, TV-14 and TV-MA)? These problems will be corrected if the industry adopts a hierarchical structure as will in any event be necessary to correct other deficiencies as discussed in Section IV-A below.

Fourth, at least two networks, NBC and BET, have made decisions not to adopt the Parental Guidelines. NBC will use the original industry proposal of ratings without content designations and BET will rate none of its programs. As the Center for Media Education *et al* observed in Footnote 6 of their Comments in this proceeding, "For example, if a parent decides to block programs with a rating of TV-PG-V, unrated BET programs and programs rated TV-PG by NBC, including those containing violent content the parent feels is harmful to his/her child may come through. Unless NBC and BET adopt the industry's universal television rating system, the ability of parents to use the V-chip easily and effectively will be severely hampered." And unless these networks voluntarily change their positions, a constitutional confrontation over First Amendment issues could result. Also because an independent service which is free from government influence, such as OKTV, does not have the constitutional vulnerabilities of the revised industry proposal, such a confrontation could lead to enhanced opportunities for independent rating organizations to serve parents.

Independent rating services will not have current industry problems resulting from lack of rating consistency, or rating hierarchy, or rating commonality. Many parents facing the above uncertainties may prefer an independent service rather than the industry service for these reasons alone. Further, the industry service is, after all, a "Swiss cheese" solution which many parents will find wanting. Not only will there be holes in the protection offered parents as a result of lack of commonality, but even more significantly there are the holes resulting from the industry's proposal not to rate news and sports, both of which frequently include video and other content harmful to young children particularly when viewing alone.

As noted previously, OKTV's independent service will rate and enable parents to block programs on a consistent "positive default" basis across all networks, including NBC and BET. Only programs which have been positively determined to be OK for children to view are coded "do not block," others will be coded for blocking. News, sports, series and certain networks will be treated on the basis of statistical analysis of programs genre. As OKTV has established in a pilot test, basing its service on a positive rather than negative default protocol makes this approach practical and very useful for parents.

IV. Objections raised by NAB *et al* and by CEMA and its members to a communications system for accommodating multiple rating services are invalid, unsubstantiated or *de minimis*, and in any event overwhelmed by the compelling government interest in child protection.

A. The revised industry proposal of September 10, 1997, although readily correctable, is currently more complex, costly and viewer unfriendly than the system proposed by OKTV.

OKTV's alternative rating system was carefully designed to be hierarchical. In contrast, the industry proposal is unnecessarily non-hierarchical, leading to increased complexities and costs in receivers, and to viewer confusion as noted earlier in these Reply Comments. If the industry will modify its rating structure to a hierarchical form, as described by OKTV in Appendix A to its Comments, not only will it be more efficiently

compatible with EIA Standard 608/744, but industry and independent services will be using the same data packet and transmission protocols.

The only differential effect on costs from multiple rating services is the need to give parents using, for example, their remote control and personal identification number the means to select an independent service rather than the proposed industry and possible Canadian services. Such an increased cost is hardly measurable and will require but a minor change in EIA Recommended Practice CEB1. Regarding viewer confusion, providing the viewer with an understanding of how to select among several rating services is but a minor problem of viewer education, and is clearly offset by the advantages to parents of a choice of rating services. Instructions can be as simple as saying "If you want rating service X, press 1; rating service Y, press 2; or rating service Z, press 3." And the services themselves have a responsibility to let their potential users know how to obtain access to their particular service.

B. Objections based on possibly impaired performance of TV receivers are invalid.

Concerns of manufacturers about impaired performance center on the latency issue. However, if field two of a program transmission contains no closed caption or other information codes, the latency delay will be less than $\frac{1}{2}$ of a second for industry and independent ratings alike. In the relatively unusual event that the second field contains closed caption codes, then the repetition rate of three seconds set forth in EIA Recommended Practice CEB1, assuming FCC approval, will result in a latency delay averaging about $1 \frac{1}{2}$ seconds. For reasons noted in OKTV Comments at pp.10-12, it is highly unlikely that the codes of more than a very few independent services will require insertion on line 21. Thus, any increase in latency delays will be trivial.

In further support of this position, it should be noted that E.E.G., Inc., in Comments in Docket 97-55, submitted a statistical analysis of latency factors which show that the increase in size of the data packet to accommodate multiple ratings, such as proposed by OKTV in Appendix A of its Comments, will have a negligible differential impairment. Tim Collings of Simon-Fraser University has reported on Canadian tests that showed no latency problems for a multiple rating data packet. The view that latency would not be a problem for multiple ratings has also been supported by others.

- C. Objections based on presumed delays in realizing the goals of Section 551 are speculative, and in any event can be resolved within the time required to resolve the commonality and other "acceptability" issues of the industry proposal.**

Virtually all commenters, including OKTV, endorse the need to minimize delays in the implementation of Section 551. Some parties, in particular CEMA and its members, assert that the provision of multiple services will make unacceptable delays unavoidable. To the contrary, assuming the Commission prescribes an open end-to-end ratings communications system incorporating the data and transmission protocols of EIA-608 and 744 as extended in accordance with OKTV's proposal, there need be no delays that cannot be resolved within the time required to resolve the commonality issues and those of data hierarchy resulting from the revised Parental Guidelines of September 10. Further, to design and test silicon components, manufacturers are now seeking a year's delay in the Commission's time table. Such delays will more than accommodate the time required, for example, to establish user interface requirements for multiple ratings which need not affect silicon designs.

- D. Objections based on lack of Commission authority are clearly refutable.**

Some commenters opposing multiple rating services have asserted that the Commission lacks authority to provide for rating systems alternative to the industry's. The legal analysis submitted by OKTV in Section IV of its Comments, pp. 18-21, indicates that the Commission has the basic authority to adopt multiple rating rules.

In the Joint Reply Comments of NAB *et al*, the assertion is incorrect that OKTV has asked "the Commission to mandate particular additional rating systems for inclusion in the V-chip. . . ." Rather than ask the Commission to "mandate" carriage of its ratings, OKTV has asked the Commission to provide an open communications system so that parents will have an opportunity to access alternative program ratings. These ratings will be voluntarily offered by entities such as OKTV. The only mandate under consideration is the Congressional mandate that the Commission provide parents with information and technology to meet the compelling government interest in child protection.

To carry out this Congressional mandate will require a Commission rule as indicated in OKTV Comments at p. 16 "that if an independent service, meeting whatever criteria the Commission may establish to determine that the system primarily serves the compelling public interest in child protection, makes its rating available to a program source, it must be inserted so that parents may have access to alternative rating services." Contrary to the assertion of NAB *et al*, in Joint Reply Comments at p. 4, this is not a must-carry or common carrier requirement for the use of line 21 of the VBI any more than are closed captioning rules providing the hearing impaired with access to on-screen information to meet a compelling public health need.

NAB *et al* further state, Joint Comments at pp. 3,4 that nothing in the statutory language or legislative history implies that Congress contemplated more than one common rating. Congress did not explicitly limit its mandate to the Commission to

make available to parents only one rating system, only that any rating system using line 21 to control blocking technology be based on common ratings. Such a requirement is necessary so that parents in referring to rating information or in selecting blocking criteria will be assured of a reliable and consistent service. As noted in Section III above, the industry's proposal does not presently meet this important feature of the Congressional mandate, whereas alternative services are clearly structured to do so.

Regarding the First Amendment assertion of Joint Commenters at pp. 4-6, OKTV acts as a private, non-censoring agent for parents, providing non-profit advice, which may or may not be taken, regarding what programs may be safe for children to view. And from the perspective of possible intrusion on the industry's First Amendment rights, OKTV's advice is narrowly tailored to advance the compelling government interest in child protection and thus can withstand such a First Amendment challenge. Further, Joint Commenters falsely claim that OKTV adds a "pejorative label" to programs. As discussed earlier in these Reply Comments, OKTV offers a "positive default" system and does not label programs "harmful," only "OK" in order to mean "not harmful." And OKTV ratings are made available voluntarily by a non-governmental organization and as such are clearly not "government sponsored labeling of speech." Joint Comments at p.5.

In sum, despite the misleading comments of NAB *et al* the Commission has authority to promulgate rules for an open communications system to enable parents to have access to multiple rating services.

V. While most characteristics of the viewer interface can be determined by market forces, a few minimum functionalities must be mandated by the Commission to assure that parents will have satisfactory access to ratings information and blocking technology.

In common with Comments of CEMA and its manufacturing members, OKTV believes market forces will in general assure parents of convenient, innovative and

affordable access to a ratings service of their choice. However, certain minimum functionalities must be prescribed by the Commission.

First is a means for parents to select a rating service of their choice. Secondly, as discussed by many commenters, parents must be able to override the service to view or allow their children to view a particular program before returning to blocking by the ratings service. Thirdly, parents, for example through use of a personal identification number, must be able to prevent an unauthorized person such as a child or caregiver from overriding the blocking service.

Fourth, of substantial importance as discussed by NAB *et al* in Comments at p. 7 and OKTV at pp. 14-15, the Commission must require means throughout a program for parents to request an on-screen display of ratings information. Parental access to timely rating information is required by Section 551.

Lastly, for reasons discussed in OKTV Comments at pp.15-17, industry resources inserting closed captioning, industry ratings or other data in line 21 must be required to insert ratings codes of independent services when such services make them available.

VI. A Commission rulemaking regarding ratings for digital television should be deferred.

Commenters are divided in recommending whether the Commission should at this time adopt requirements for distributing ratings via digital transmissions or to defer addressing this problem at least until issues regarding ratings in the analog world are resolved. Because of many of the problems discussed by OKTV herein, we strongly support those recommending deferral at least until they are resolved.

VII. A “positive rating” option would be inconsistent with the purposes of Section 551 and might impose performance penalties.

While Tim Collings, *et al* have made an innovative technical proposal for an open communications system that could accommodate multiple services, there are two problems with this proposal. A “positive rating option” such as Collings *et al* have proposed is to be distinguished from a “positive default” mode as discussed earlier in these Reply Comments. The Collings proposal presumes that industry ratings restrict content available to children in a manner adequately protective of their health and well-being and that the need is to override, i.e., unblock, the industry’s rating at times for educational or other societal reasons. Many commenters, including OKTV, seriously question whether that is the problem and whether industry ratings alone provide adequate protection. The Collings’ system could be used in a positive default mode for alternative rating services but that is not what has been proposed.

Secondly, from the perspective of the requirements of Section 551, the proposal is not limited to the government interest in child protection. It is proposed for private uses based on “member’s concerns, interests and values.” While such a system may be useful, for example, in the digital world to come, it cannot lay claim to the limited data space available for public purposes on line 21 of the VBI of analog transmissions.

Even if these objections were to be put aside, it would be hard to justify the increased costs and complexities associated with the proposed down-loading capabilities which would require extra microprocessing and digital storage capacities in receivers or set-tops, except as an option for manufacturers.

VIII. Patent issues raised by Toshiba need not interfere with the timely implementation of an optimal ratings communications system.

Without being specific, Toshiba has suggested that certain patent rights to necessary blocking technology may belong to one or more parties who might seek to

impose unacceptable cost burdens on the industry. OKTV has preliminary arrangements with several parties holding significant patent positions in blocking technologies for royalty-free usage, but not manufacturing rights, for the limited purpose of offering child protection services.

Also, it might be noted that Cable Television Laboratories, Inc. was organized, among other reasons, to work out issues of interoperability in the face of strong proprietary positions. The resulting licensing administrator for MPEG, the compression technology now being extensively employed by the television industry, exemplifies the possibilities. The current Open Cable™ initiative is also expected to resolve issues involving proprietary patent positions.

This comment is simply to suggest that if the problem flagged by Toshiba turns out to be of significance, various avenues for private resolution of the difficulties should be up to the challenge without the need for Commission action.

IX. Conclusion

Wherefore as recommended herein, the Commission should:

- (1) promptly prescribe engineering and operational rules for an open end-to-end communications system using line 21 of the VBI of analog television signals so that parents will have convenient access to a rating information and blocking service of their choice, whether an industry service or an independent service.
- (2) not find the industry proposal of September 10, 1997 "acceptable" until at a minimum it has been modified to meet such prescribed technical requirements.

Respectfully submitted,



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