ORIGINAL

RECEIVED

APR 22 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of	)	
LCI Petition for Declaratory Ruling Concerning Bell Operating Company Entry Into In-Region Long Distance Markets	)	CC Docket No. 98-5

DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS OF THE
AD HOC TELECOMMUNICATIONS USERS COMMITTEE**

Economic Consultant
Lee L. Selwyn
President
Economics and Technology, Inc.
One Washington Mall
Boston, Massachusetts 02108

James S. Blaszak
Kevin S. DiLallo
Levine, Blaszak, Block & Boothby, LLP
2001 L Street, NW.
Suite 900
Washington, D.C. 20036
(202) 857-2550

April 22, 1998

No. of Copies rec'd 0+12
List ABCDE

Summary

RBOC criticisms that the LCI proposal alters and improperly interferes with administration of the statutory criteria for RBOC long distance entry explicit in Section 271 are unfounded for two reasons. First, the "fast track" would be strictly optional and entirely voluntary, and thus would not remove any path previously available to the RBOCs for achieving Section 271 compliance. Second, an RBOC's decision to undertake a voluntary restructuring consistent with the LCI proposal would be evidence of the RBOC's opening of its network, but would not preclude the FCC from specifically examining competitive conditions consistent with Section 271.

And the "fast track" proposal will not lead to delays in long-distance entry. Whether an RBOC proceeds with its current corporate structure or adopts a separated structure that is clearly more conducive to non-discriminatory dealings with retail competitors, in the final analysis the responsibility for complying with Section 271 lies with each RBOC.

Attacks on the LCI proposal as a Fifth Amendment taking are unfounded. The LCI proposal is strictly voluntary. Moreover, the Fifth Amendment does not protect against every deviation from the RBOCs' financial *status quo*, but merely takings of property that are *both* involuntary *and* uncompensated. In its initial comments, Ad Hoc specifically addressed these concerns, and described a mechanism through which an RBOC, upon affirmatively demonstrating that NetCo would not recover its embedded investment at TELRIC rates, could be "made whole" with respect to any such "gap" between embedded and incremental costs that can be shown to exist and where the specific assets in question had been acquired by the BOC to provide core business and residential dial tone services. Moreover, the assignment of all

yellow pages profits ("contribution" in excess of cost) to NetCo would be fully sufficient to eliminate any possibility of NetCo revenues falling below a NetCo revenue requirement.

The RBOCs' arguments with respect to "duplication of business activities" is also unpersuasive. At the time of the break-up of the former Bell System, AT&T and the BOCs shared wire centers, central offices, and in some cases even the same physical switching entities. The kind of physical separation that would be required between a NetCo and a ServeCo is entirely analogous.

The Supreme Court has on several occasions held that utilities must be afforded an opportunity to recover and to earn a reasonable return on their investments used and useful in the provision of regulated services. The Court has limited Fifth Amendment protection to the original cost incurred by the utility in acquiring its assets, and has not extended it to protection of excess profits. In *Duquesne Light Co.,* the Court modified its prior holdings to provide regulatory agencies with the flexibility to deny recovery of individual investments (*e.g.*, an unfinished nuclear power plant) so long as in the aggregate the utility is provided with the opportunity to recover the totality of its investment. Deregulating ServeCo and permitting the RBOC to enter the long distance business may be sufficient countervailing actions to fully satisfy *Duquesne*. As demonstrated below, assignment of yellow pages profits to NetCo should eliminate any possibility of a "gap" within NetCo itself. If, however, the Commission finds that a "gap" exists, Ad Hoc's Comments proposed an approach that could eliminate the "gap."

Nationally, RBOC Yellow Pages profits may be in the range of $4 to $5 billion or more each year. Those funds should be used, first, to eradicate any *legitimate* embedded/incremental cost gap that can be demonstrated to exist as a result of investments made to provide core services, and thereafter to support the various universal service funding objectives, including schools, libraries, and rural health care facilities.

The concerns raised by the various parties support Ad Hoc's recommendation that all assets associated with the monopoly provision of local service must be retained by the NetCo entity following the split of the integrated RBOC and that, conversely, it is critical that the incumbent BOCs' retail operations not be permitted to gain any competitive advantage due to their incumbency as the dominant local telephone monopolies or through the preexisting integration of network and retail functions. In that regard, it is essential that all tangible incumbency and integration advantages flow to NetCo, and specifically *not* to ServeCo.

TABLE OF CONTENTS

Page

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
LCI International Telecom Corp.	)	CC Docket No. 98-5
Petition for Expedited Declaratory Ruling	)	

REPLY COMMENTS OF THE AD HOC TELECOMMUNICATIONS USERS COMMITTEE

The Ad Hoc Telecommunications Users Committee (hereinafter the "Committee" or "Ad Hoc") hereby replies to certain comments that were filed regarding the above-captioned Petition for Declaratory Ruling.

In its Comments on the LCI "fast track" plan, the Committee voiced its support for regulatory policies that will promote the development of effective and lasting competition in the telecommunications market , and expressed the view that LCI's proposal could contribute to advancing this result. The Committee believes that the prospects for effective, wide-spread competition in the local exchange and access service market are not good absent favorable appellate developments or acceptance of a new innovative approach such as that proposed by LCI.

The Committee also expressed doubt that the "fast track" plan, in the form proposed by LCI, would induce Regional Bell Operating Companies ("RBOCs") to undertake a voluntary restructuring of their operations to support competition in the local exchange and exchange access markets. Accordingly, Ad Hoc suggested a modification to LCI's proposal – a modification which, if selected by the RBOCs, would allow them to (1) recover through Netco the so-called "gap" between their embedded accounting costs and the revenues that they would recover if they offered unbundled network functionalities at rates set to recover forward-looking economic costs; and (2) earn through ServeCo higher earnings than would otherwise be permissible. In short, the RBOCs could, if they opted for the LCI fast track approach "make money" and be "made whole."

Not surprisingly, the RBOCs have denounced the LCI proposal and raised a host of legal, economic and competitive impediments to its adoption. Other parties have raised concerns and added their own suggestions for making the LCI plan a more viable and effective framework for overcoming the RBOCs' resistance to opening their local exchange markets.

A. LCI's proposal would provide a strictly voluntary means for the RBOCs to demonstrate compliance with the requirements of Section 271.

Some RBOCs have criticized the LCI proposal for altering and improperly interfering with administration of the statutory criteria for RBOC long distance entry explicit in Section 271.[1] These criticisms are unfounded for two reasons. First, the "fast track"

[1] Comments of Bell Atlantic in CC Dkt. No. 98-5 (filed March 23, 1998) at 5; Opposition of Ameritech in CC Dkt. No. 98-5 (filed March 23, 1998) at 7; Comments of SBC Communications in CC Dkt. No. 98-5 (filed

would be strictly optional and entirely voluntary, and thus would not remove any path previously available to the RBOCs for achieving Section 271 compliance. Second, an RBOC's decision to undertake a voluntary restructuring consistent with the LCI proposal would be evidence of the RBOC's opening of its network, but would not preclude the FCC from specifically examining competitive conditions consistent with Section 271.

As a number of parties point out, LCI's proposal would neither supersede nor replace the existing requirements established under the Section 271 checklist for long-distance entry.[2] The Commission would still need to examine fully whether or not "competitive checklist" compliance had been achieved. Indeed, as Ameritech correctly states, the "Commission cannot swap structural separation for proof that an RBOC has met each and every one of the competitive checklist requirements."[3] However, there is a reasonable presumption (rebuttable if circumstances indicate otherwise) that if all providers, including ServeCo, are obtaining their access to an ILEC's network on identical terms, then the conditions in the "competitive checklist" are likely to have been satisfied. Conversely, any RBOC not wishing to adopt the fast track approach would be free to demonstrate its compliance with the "competitive checklist" and public interest criteria in Section 271, consistent with the approach that has been previously identified by the FCC and discussed in detail in the various Section 271 orders the Commission has adopted to

(..continued)
March 23, 1998) at 24; Comments of US West in CC Dkt. No. 98-5 (filed March 23, 1998) at ii; Comments of BellSouth in CC Dkt. No. 98-5 (filed March 23, 1998) at 2.

2 Comments of Competition Policy Institute in CC Dkt. No. 98-5 (filed March 23, 1998) at 13-14; Comments of Competitive Telecommunications Association (CompTel) in CC Dkt. No. 98-5 (filed March 23, 1998) at 4.

3 Ameritech Opposition at 17-18.

date. Ad Hoc also agrees with CompTel that "nothing in a Fast Track alternative will adversely affect the pro-competitive policies already adopted by the FCC and states."[4]

Ad Hoc also disagrees with Ameritech's claims that the "fast track" proposal will simply lead to delays in long-distance entry.[5] Whether an RBOC proceeds with its current corporate structure or adopts a separated structure that is clearly more conducive to non-discriminatory dealings with retail competitors, in the final analysis the responsibility for complying with Section 271 lies with each RBOC. If the RBOC believes that it can demonstrate compliance with Section 271 (and Section 272) without adopting the type of structural separation proposed by LCI, it has the choice to pursue this path.

B. Concerns raised by ILECs regarding the financial viability of the NetCo, to the extent they have any validity at all, are answered by Ad Hoc's proposal.

In their Comments, both Ameritech and Bell Atlantic raise questions regarding the feasibility of a NetCo that operates an embedded incumbent network, but is constrained to charge wholesale rates based on forward-looking costs. For example, Ameritech states that "since the BOC's NetCo will only sell services at forward-looking incremental costs, it[s] operations will not be financially viable."[6] In addition, Ameritech contends that inefficiencies resulting from the duplication of business activities between NetCo and ServeCo, "when

---

4 CompTel Comments at 16.

5 Ameritech Opposition at 18-19. Ameritech objects that the procedure for establishing fast track, and the restructuring that it will subsequently mandate, will result in a complicated corporate split, requiring 18-36 months to plan and implement, and will thus "delay long distance entry by at least 2 to 4 years." Ameritech states that this is "considerably longer than Ameritech estimates it will take for it to achieve long distance relief under the current process required by Congress." *Id.* at 19.

6 Ameritech Opposition at 17; Similarly, Bell Atlantic states that "by severely limiting the services the Bell Operating Companies' wholesale companies can offer and by capping their prices 'at cost,' it is hard to imagine how these corporations could remain financially viable. Bell Atlantic Comments, at 7.

combined with having to price virtually all its services (interconnection and network elements) at the Commission's TELRIC methodology . . . would create a non-viable wholesale entity."[7] Bell Atlantic asserts that a restructuring along the lines proposed by LCI's fast-track option would violate the ILECs' Fifth Amendment rights.[8] It claims that, "[w]ith no opportunity to offer services at profitable prices, there would be no incentive for anyone to invest in these companies."[9]

There is no legitimate basis for the outrage expressed by these RBOCs. To begin with, as already addressed by Ad Hoc and other parties, the LCI proposal is strictly voluntary. Moreover, the Fifth Amendment does not protect against every deviation from the RBOCs' financial *status quo*, but merely takings of property that are *both* involuntary *and* uncompensated. In its initial comments, Ad Hoc specifically addressed these concerns, and described a mechanism through which an RBOC, upon affirmatively demonstrating that NetCo would not recover its embedded investment at TELRIC rates, could be "made whole" with respect to any such "gap" between embedded and incremental costs that can be shown to exist and where the specific assets in question had been acquired by the BOC to provide core business and residential dial tone services.[10]

---

7 Ameritech Opposition, Attachment A at 2.

8 Bell Atlantic Comments at 7. Bell Atlantic's argument is based on its belief that LCI's proposal violates the Fifth Amendment by forcing NetCo to charge rates for all services "at cost," and by basing those wholesale rates on "the forward-looking costs of a hypothetical, most efficient network." *Id.* This argument is virtually the same one Bell Atlantic has raised in its opposition to each and every proposal before this Commission involving the use of TELRIC rather than embedded costs as the basis for competitive rates.

9 *Id.*

10 As Ad Hoc noted, there can be no "takings" claim with respect to assets that were acquired by an RBOC in pursuit of competitive services such as Centrex or to acquire strategic resources and capabilities for a future, less regulated environment. Moreover, since the overwhelming share of the regulatory assets currently in RBOC rate bases were acquired since the beginning of 1990 when these companies were clearly

Moreover, as we discuss *infra*, the assignment of all yellow pages profits ("contribution" in excess of cost) to NetCo would be fully sufficient to eliminate any possibility of NetCo revenues falling below a NetCo revenue requirement.

The RBOCs' arguments with respect to "duplication of business activities" is also unpersuasive. At the time of the break-up of the former Bell System, AT&T and the BOCs shared wire centers, central offices, and in some cases even the same physical switching entities. The kind of physical separation that would be required between a NetCo and a ServeCo is entirely analogous. Aside from unsupported speculations, there is no basis to conclude that the diseconomies of dismemberment of an integrated BOC would be so great as to overcome the significant competitive and public benefit that would result from structural separation of the NetCo and ServeCo activities.

C. The RBOCs overstate the magnitude of the "gap" and exaggerate the alleged inability of a NetCo to fully recover its embedded costs even at TELRIC-based prices.

Stripped of the excess rhetoric, the complaints by the RBOCs revolve around the so-called "gap" between forward-looking economic cost and the ILECs' embedded investments. Ad Hoc predicted that the RBOCs' obsession with the "gap" would be a major sticking point in their willingness to consider LCI's proposal. This is precisely why, in its initial comments, the Committee proposed a mechanism for addressing "gap" issues as a further incentive for the RBOCs to adopt full structural separation of their wholesale and retail businesses.

(..continued)
on notice that under "price cap" and other incentive regulatory paradigms *that they themselves supported* there would be no cost-plus assurance of recovery for assets purchases that failed to generate sufficient revenues.

However, the "gap" envisioned by the RBOCs is a very different gap than the one the Ad Hoc Committee's modification would address. The Supreme Court has on several occasions held that utilities must be afforded an opportunity to recover and to earn a reasonable return on their investments used and useful in the provision of regulated services.[11] The Court has limited Fifth Amendment protection to the original cost incurred by the utility in acquiring its assets, and has not extended it to protection of excess profits. in *Duquesne*, the Court modified its prior holdings to provide regulatory agencies with the flexibility to deny recovery of individual investments (*e.g.*, an unfinished nuclear power plant) so long as in the aggregate the utility is provided with the opportunity to recover the totality of its investment.[12] Deregulating ServeCo and permitting the RBOC to enter the long distance business may be sufficient countervailing actions to fully satisfy *Duquesne*. As demonstrated below, assignment of yellow pages profits to NetCo should eliminate any possibility of a "gap" within NetCo itself. If, however, the Commission finds that a "gap" exists, Ad Hoc's Comments proposed an approach that could eliminate the "gap."

---

[11] *E.g., Duquesne Light Co. v. Barasch*, 488 U.S. 299 (1989); *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591, 603 (1944); *Permian Basin Area Rate Cases*, 390 U.S. 747 (1967).

[12] *Duquesne Light, supra,* note 11, 488 U.S. at 316.

D. Revenues from historic subsidy sources such as Yellow Pages must be assigned to NetCo so as to eliminate any "gap" problem and to foreclose an anticompetitive subsidy to the RBOC's competitive retailing or long distance operations.

Yellow Pages directory advertising[13] has historically been an important source of revenues used to maintain basic telephone service rates at affordable levels. Historically, ILECs have been able to offer a substantial value to advertisers because their Yellow Pages directories are delivered to virtually all households and businesses in the company's serving area. ILECs (1) possessed immediate access to the information necessary to create the Yellow Pages; and (2) by virtue of their relationship with nearly all households and businesses in their serving territories, the ILECs offered potential advertisers a high level of visibility from a well-recognized source (*i.e.*, the local telephone company). As a result, since well before the divestiture of the Bell System, the ILECs have reaped substantial profits from their Yellow Pages business.

The MFJ consent decree that broke up the Bell System addressed and recognized the specific contribution-generating role of the Yellow Pages business. When the terms of the MFJ were initially announced on January 8, 1982, the Yellow Pages were to be assigned not to the Bell Operating Companies (BOCs), but instead to AT&T. However, in his *Order* dated July 26, 1984, adopting the MFJ, Judge Greene reversed this disposition, concluding that important public policy objectives required the profits from Yellow Pages to be retained by the operating telephone companies as a source of subsidy to their local

[13] Hereafter, Ad Hoc uses the term "Yellow Pages" to refer to all directory advertising activities undertaken by incumbent LECs that result in printed or electronic directories that are made available to all subscribers in the utility's service territory.

telephone businesses.[14] While the introduction of local competition means that, for the first time, multiple providers are involved in offering basic exchange service on a retail basis, this change does not alter or diminish the intended purpose behind the long standing precedent that earmarks Yellow Pages profits for the support of basic telecommunications services.

For all practical purposes, the Yellow Pages is a monopoly business for which the prospect of effective competition is extremely remote. Although ILECs frequently point to the presence of other directories as well as the use by others of the ILECs' subscriber lists and exchange carrier lists, there is no evidence that any one of these alternatives poses any serious competitive threat to the ILECs' monopoly control over the Yellow Pages market. Indeed, the sustained large profit margins that ILECs have been able to amass and retain from their Yellow Pages business confirms the lack of effective competition and the presence of pervasive market power.

The important role of Yellow Pages revenues is neither diminished nor modified merely because competitive firms are being authorized to enter the local telephone service market. And under LCI's plan, it becomes a simple matter to maintain Yellow Pages

---

14 *US v. Western Electric Co.*, 592 F.Supp. 846 (D.D.C.1984). The Judge stated that:

> [T]he loss of this large subsidy would have important consequences for the rates for local telephone service. For example, the state of California claims that a two dollar increase in the rates for monthly telephone service would be necessary to offset the loss of revenues from directory advertising. Other states assert that increases of a similar magnitude would be required.

Id. at 866. Judge Greene added:

> [W]hen the court required AT&T to turn over its Yellow Pages operations to the operating companies, it assumed that revenues from directory advertising would continue to be included in the rate base of the Operating Companies, providing a subsidy to local rates.

Id. at 865.

support in a competitively neutral manner, by ensuring that such support flows to the NetCo, *and not to the ServeCo or HoldCo.* Yellow Pages profits flowing to the NetCo would fund most, and probably all, of any shortfall that might otherwise exist as between historic and forward-looking costs on a going-forward basis, ensuring that the NetCo could charge rates to ILECs (both the ServeCo and competitors) based strictly upon forward-looking economic costs, thus maximizing the flow of benefits to retail end-user customers. Indeed, *any other disposition of the RBOCs' yellow pages business would permit the HoldCo to directly subsidize the ServeCo or any other competitive line of business with a source of revenue that is simply not available to any non-integrated rival.* If Yellow Pages profits were to flow directly or indirectly to ServeCo, it would be virtually impossible for any competing retail provider to overcome ServeCo's cost advantage.

Nationally, RBOC Yellow Pages profits may be in the range of $4 to $5 billion or more each year. Those funds should be used, first, to eradicate any *legitimate* embedded/incremental cost gap that can be demonstrated to exist as a result of investments made to provide core services, and thereafter to support the various universal service funding objectives, including schools, libraries, and rural health care facilities.

E. The proper division of assets between the regulated wholesale NetCo and the non-regulated retail ServeCo is of great importance.

Many commenters have observed that the level of structural separation required under the LCI proposal is not sufficient to undo the significant advantages that NetCo can provide to ServeCo by virtue of their continued affiliation. For example, ICG Telecom points out that the issue of asset transfers between the ServeCo and the NetCo is of extremely great concern.[15] Ad Hoc finds these concerns compelling. Clearly, the proper valuation of all such BOC assets, before the regulatory split into NetCo and ServeCo, is necessary to help ensure that each entity will derive only the assets necessary for it to provide service to local exchange carriers and end-user customers, respectively. Accordingly, Ad Hoc urges the Commission to apply its rules regarding transactions between affiliates to transactions involving ServeCo, with ServeCo being treated as though it were providing unregulated services.[16]

The concerns raised by the various parties support Ad Hoc's recommendation that all assets associated with the monopoly provision of local service must be retained by the NetCo entity following the split of the integrated RBOC and that, conversely, it is critical that the incumbent BOCs' retail operations not be permitted to gain any competitive advantage due to their incumbency as the dominant local telephone monopolies or through the preexisting integration of network and retail functions. In that regard, it is essential that all tangible incumbency and integration advantages flow to NetCo, and specifically *not* to ServeCo.

One major source of such incumbency advantage is found in the roughly $5-billion in annual revenues that BOCs currently derive from advertising in their white and, more specifically, yellow pages directories.[17] Data provided by Bell Atlantic-Pennsylvania in its

---

15 ICG Telecom Comments in CC Dkt. No. 98-5 (filed March 23, 1998) at 11.

16 47 CFR § 32.27.

17 It is not possible to obtain precise information on the amount of yellow pages profits that are produced by individual BOCs and other ILECs, because financial information on yellow pages revenues, costs and profits is typically not reported to the FCC or state commissions. Extrapolation of a nationwide figure can, however, be approximated by utilizing BOC-specific data that is available. Data provided by Bell Atlantic-Pennsylvania in the Company's 1997 10-K report identifies 1996 yellow pages contribution at $202-million (revenues less direct expenses; Bell Atlantic does not separately identify indirect

1998 Form 10-K filing suggests a potential yellow pages contribution of between $4 and $5 per month per residential access line.[18]

Although quantification of the total yellow pages subsidy, on a nationwide basis, is difficult because incumbent LECs are not generally required to report such figures, the total likely exceeds $5-billion annually. If the type of wholesale/retail restructuring that is proposed by LCI is pursued, it is essential that all yellow pages contributions of revenues in excess of costs be flowed entirely to the wholesale entity, NetCo.

CONCLUSION

It is clear from the comments in this proceeding — including those submitted by Ad Hoc — that LCI's "fast-track" proposal may require some modification before it can serve as a useful framework for advancing local competition. Certainly, LCI's proposal highlights the fact that the RBOCs and other ILECs have not, to date, seemed to face sufficient incentives to induce them to implement local competition, as intended by Congress and the FCC. A structural solution may hold the best promise for redirecting the RBOCs.

The Commission should not, however, be discouraged merely because the LCI plan, as presented in its petition, appears to offer little attraction for the RBOCs. Structural separation and line-of-business restrictions were imposed as between the long distance

(..continued)
expenses for its directory business, which may or may not vary with its total number of yellow pages customers), which works out to $4.30 per month for each of the Company's 3.9-million residence lines in service during that year.

18 Extrapolating the California and Pennsylvania per-line contribution levels to the approximately 103-million residence access lines in service nationwide (based on the 1996/1997 Statistics of Common Carriers) suggests aggregate yellow pages profits exceed $5-billion. Obviously, the Commission will need to collect accurate yellow pages contribution information from all ILECs, but whatever this amount turns out to be, it should be used to offset the embedded/incremental cost gap and, if any funds remain after than, to offset universal service funding requirements.

and local service arms of the former Bell System precisely because no other, less extreme, measure seemed able to achieve the level of carrier indifference that the BOCs ultimately required in order to induce them to deal with non-incumbent long distance and customer premises equipment vendors on the same terms and conditions as were being offered to affiliates and internal BOC functions in these areas. That strategy was well worth the effort: Robust competition has developed in both the long distance and premises equipment sectors, and customers have benefitted through lower prices and substantially increased product/service choices. If the kind of restructuring that is envisioned by the LCI petition — or even a more extreme form of industry reorganization — is what it will take to foreclose continue anticompetitive acts by the BOCs, the benefits may well exceed the societal costs.

Respectfully submitted,

AD HOC TELECOMMUNICATIONS
USERS COMMITTEE

By: Kevin DiLallo

James S. Blaszak
Kevin DiLallo
Levine Blaszak Block & Boothby, LLP
2001 L Street NW
Suite 900
Washington, DC 20036
202-857-2550

Economic Consultant:
Lee L. Selwyn
President
Economics and Technology, Inc.
One Washington Mall
Boston, Massachusetts 02108

April 22, 1998

200.03/lci reply

Certificate of Service

I, Suzanne Takata, hereby certify that true and correct copies of the preceding Reply Comments of the Ad Hoc Telecommunications Users Committee in the Matter of LCI International Telecom Corp. Petition for Expedited Declaratory Ruling pursuant to the Commission's January 26, 1998 request for comments regarding CC Docket No. 98-5 were served this 22nd day of April, 1998 via hand delivery upon the following parties:

Janice M. Myles
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, NW.
Washington, DC 20554

ITS
1919 M Street, NW.
Washington, DC 20554

Suzanne Takata

Suzanne Takata