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

In the Matter of	)	
	)	
Cellular Telecommunications Industry Association's Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations	)	WT Docket 98-229
	)	
and	)	
	)	
Number Portability	)	CC Docket No. 95-116

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OFFICE OF THE SECRETARY

OPPOSITION OF AT&T WIRELESS SERVICES, INC.

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Portability Obligations	)	
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and	)	
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OPPOSITION OF AT&T WIRELESS SERVICES, INC.

Pursuant to Section 1.106(g) of the Commission's Rules, 47 C.F.R. § 1.106(g), AT&T Wireless Services, Inc. ("AWS") hereby submits its opposition to the petitions for reconsideration of the Commission's decision to extend the deadline for Commercial Mobile Radio Services ("CMRS") providers' number portability ("LNP") obligations.[1/]

INTRODUCTION AND SUMMARY

The Commission's Forbearance Order was fully supported by the law and the facts and should be upheld. The Commission applied the three-prong forbearance test set forth in Section 10 of the Communications Act to a well-developed record and reasonably found that adhering to the March 2000 deadline for wireless LNP is unnecessary to ensure just and reasonable rates or to protect consumers, and that extending the deadline is in the public interest. Based on these

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[1/] Cellular Telecommunications Industry Association's Petition for Forbearance from Commercial Mobile Radio Services Number Portability Obligations and Telephone Number Portability, Memorandum Opinion and Order, 64 Fed. Reg. 22,562 (1999) ("Forbearance Order").

determinations, the Commission is required to forbear. The petitioners fail to provide new facts, changed circumstances, or policy considerations that warrant revisiting the Commission's decision.

Statutory mandates notwithstanding, extending the wireless LNP deadline recognizes the technical limitations of wireless networks and strikes the appropriate balance between the goal of fostering robust competition in the CMRS marketplace and requiring enormous expenditures to achieve wireless LNP capability in the near term. For two years, the industry has diligently worked to resolve the unique difficulties CMRS providers face in implementing number portability. The industry has developed a deployment schedule that is extremely rigorous, and will demand substantial capital and human resources in order to meet the November 24, 2002 deadline. Accelerating this schedule simply is not feasible. Nor is it necessary. Congress intended for number portability to spur competition by enabling consumers to retain their phone numbers and, thus, switch more easily among service providers. The Commission has found that the CMRS market is vigorously competitive, and that number portability in the near term is unnecessary to sustain or increase such competition. Accordingly, the Commission acted reasonably in setting a deployment deadline that is achievable from a technical standpoint.

Moreover, contrary to the claims of some petitioners, there is no evidence that the wireless LNP extension will have a material effect on the efficient use of numbering resources. As the record demonstrates, wireless carriers use their numbers efficiently and, thus, their participation or lack of participation in LNP-dependent conservation measures, such as pooling, is of little consequence. In addition, during the period in which they are not LNP-capable, wireless carriers can participate in non-LNP-based conservation methods to further the efficient management of numbering resources.

Finally, the Commission should disregard any suggestion that wireless carriers could participate in number pooling in the absence of full wireless LNP. Such a plan, if feasible, would require wireless carriers to divert resources away from LNP implementation, thus jeopardizing their ability to meet the November 24, 2002 deadline.

I. EXTENDING THE WIRELESS LNP DEADLINE IS REQUIRED BY THE ACT

Under section 10 of the Communications Act, the Commission is required to forbear from applying any regulation or provision of the Act to a carrier if it determines that: (1) enforcement is not necessary to ensure that terms and charges are just, reasonable, and not unreasonably discriminatory; (2) enforcement is not necessary to protect consumers; and (3) forbearance is consistent with the public interest.[2/] In deciding to extend the wireless LNP deadline, the Commission rigorously applied the three-prong analysis to an extensive record that included the views of the instant petitioners.[3/] The petitioners advance no new points of fact or policy that merit revisiting the Commission's decision.[4/]

[2/] 47 U.S.C. § 160(a).

[3/] The instant petitioners, GTE Service Corporation ("GTE"), MCI WorldCom Inc. ("MCI WorldCom"), and the Telecommunications Resellers Association ("TRA"), filed comments and the Pennsylvania Public Utilities Commission ("PAPUC") filed an ex parte presentation on the petition to extend the wireless number portability deadline filed by the Cellular Telecommunications Industry Association ("CTIA").

[4/] The Commission may entertain a petition for reconsideration only if it presents new facts or changed circumstances, facts that the petitioner could not have discovered previously with an exercise of due diligence, or facts that the Commission believes should be considered consistent with the public interest. 47 U.S.C. § 405(a); 47 C.F.R. § 1.106(c)(1)(2).

A. The March 2000 Deadline for Wireless LNP is Not Necessary to Ensure Rates that are Just, Reasonable, and Not Unreasonably Discriminatory

The Commission reviewed the record and correctly found that because the CMRS market is vigorously competitive with an increasing number of entrants, wireless number portability is not necessary in the near term to ensure just, reasonable and nondiscriminatory rates.[5] In rendering this decision, the Commission relied on numerous sources, including comments from interested parties, its report to Congress analyzing competition in the CMRS market, and several pricing trend reports.[6] The data in all of these resources pointed to the same conclusion: competition in the CMRS market is growing rapidly without wireless LNP; moreover, wireless LNP is not necessary to ensure that this growth continues.[7] This finding fulfills the first prong of the forbearance test, and nothing presented by the petitioners demonstrates otherwise.

TRA provides no support for its claim that number portability would stimulate additional competition in the marketplace.[8] Indeed, based on its own extensive analysis, the Commission found exactly the opposite -- that wireless LNP is not necessary for continued growth in wireless services competition, nor for the advancement of wireless to wireline competition in the near

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[5] Forbearance Order at ¶ 19.

[6] Id. ¶ 19. On June 24, 1999, the Commission released its fourth report on competition in the CMRS market, in which it finds that competition has increased over last year, especially with respect to wireless telephone services. The report finds that there are now at least five mobile telephone service providers in each of the 35 largest Basic Trading Areas ("BTAs"), and at least three mobile telephone providers in 97 of the 100 largest BTAs. The Commission also finds that as a result of this increased competition, the average price of wireless service has fallen substantially during the past year. Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, Fourth Report, FCC 99-136 (rel. June 24, 1999).

[7] Forbearance Order at ¶ 19.

[8] Petition of TRA at 8.

term.[9] Moreover, the Commission found that extending the deadline would not give wireless carriers a competitive advantage over wireline carriers subject to porting requirements because, as a practical matter, wireless carriers would have limited ability to accept ported numbers from wireline carriers until their networks are configured to support number portability.[10] In light of the consistent growth in competition, the Commission correctly found that adherence to the March 2000 deadline for wireless LNP is unnecessary to ensure rates that are just, reasonable, and not unreasonably discriminatory.

B. Immediate Wireless LNP is Not Necessary to Protect Consumers

The Commission correctly concluded that requiring wireless providers to implement LNP by March 31, 2000 is not necessary to safeguard the interests of consumers.[11] The Commission based its decision on a record that demonstrates unequivocally that wireless consumers are more concerned about price and service quality than the ability to take their numbers from carrier to carrier.[12] Furthermore, the Commission noted that wireless consumers' priorities are unlikely to change until regulatory schemes and business models accommodate a "calling party pays" option thereby making wireless phones a better substitute for wireline.[13] Until such changes make number porting a more practical alternative for consumers, it is pointless to require wireless carriers to meet an implementation schedule that is nearly impossible from a technical standpoint.

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[9] Forbearance Order at ¶¶ 34-35.

[10] Id. at ¶ 36.

[11] Id. at ¶ 22.

[12] Id.

[13] Id. at ¶ 23.

TRA's assertion that the Commission applied the wrong standard in conducting the consumer protection analysis is meritless.[14] The Commission set forth the appropriate standard and used indicators such as industry churn rates and consumer surveys to reasonably conclude that number portability is not a high priority among wireless consumers.[15] Moreover, the Commission did not conclude, as TRA implies, that wireless LNP will continue to be unimportant to wireless consumers and, as such, could be delayed indefinitely. To the contrary, the Commission noted that wireless LNP will likely become increasingly important for wireless customers.[16] Until that time, however, number portability is not necessary to ensure consumer protection. The petitioners fail to present credible arguments or evidence that warrant reversing this well-reasoned decision.

C. Extending the Deadline for Wireless LNP Serves the Public Interest

In applying the third prong of the forbearance analysis, the Commission found that extending the wireless LNP timeline serves the public interest in two ways. First, the Commission found that the wireless industry needs additional time to develop and deploy the technology that will facilitate number portability.[17] Second, the Commission determined that extending the deadline would promote competition by allowing CMRS carriers to devote their

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[14] Petition of TRA at 12 (stating that the Commission applied the wrong standard by erroneously asking whether adhering to the current implementation schedule "is necessary to prevent affirmative harm to consumers.").

[15] Forbearance Order at nn. 66 & 67.

[16] Id. at ¶ 23.

[17] Id. at ¶ 25.

limited resources to completing network buildout, technical upgrades, and other improvements that consumers rely on in choosing a service provider.[18]

TRA argues that the Commission's analysis was deficient, in part, because it failed to evaluate how TRA's alternative methodology for number portability would mitigate the technical hurdles posed by wireless LNP.[19] On this point, TRA is simply wrong. The Commission affirmatively rejected TRA's alternative methodology based on overwhelming evidence of its technical impracticability, and the fact that the wireless industry previously considered and rejected similar proposals.[20] Moreover, the Commission found that even if TRA's proposal were technically viable, adopting it would force the wireless industry to abandon current methodologies and sacrifice the LNP progress made to date.[21]

MCI WorldCom does not discount the Commission's findings, but instead calls for onerous reporting requirements to guard against what it perceives as "foot-dragging" on behalf of the wireless industry.[22] According to MCI WorldCom, remarks made by the Wireless Number Portability Subcommittee co-chair at the February 7, 1999 meeting of the North American Numbering Council (the "NANC") demonstrate that the wireless industry had not until recently considered the logistics of LNP implementation.[23] Thus, MCI WorldCom argues that the top ten

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[18] Id. at ¶ 26.

[19] TRA Petition at 14.

[20] Forbearance Order at ¶ 32.

[21] Id. at ¶ 33.

[22] MCI WorldCom Petition at 2.

[23] Id. at 4.

wireless carriers should make quarterly reports outlining in detail their progress toward implementing LNP.[24]

MCI WorldCom's claims have no basis in reality. As the Commission's representatives to the NANC can verify, for the past two years the wireless industry has devoted substantial monetary and manpower resources to LNP implementation issues,[25] and has completed the standards setting process for wireless-to-wireless porting. Ironically, most roadblocks to establishing industry agreements that integrate wireless into the porting process flows have been a result of the wireline industry's concerns about wireline-to-wireless porting.[26] Moreover, the Wireless Number Portability Subcommittee already reports to the NANC on a monthly basis regarding the industry's implementation progress.[27] Any illegitimate delay on the part of the

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[24] Id. at 2.

[25] As CTIA noted in its petition for extension, the wireless industry was taking steps to solve number portability issues prior to the Commission's first number portability order. Similarly, the wireless industry began the complicated task of setting standards for splitting the Mobile Identification Number ("MIN") from the Mobile Directory Number ("MDN") well in advance of the original June 30, 1999 LNP implementation deadline. Petition for Extension of Implementation Deadlines of the Cellular Telecommunications Industry Association at 2-3 (filed November 24, 1997).

[26] For example, in September 1998, the wireless industry learned that the Number Portability Administrative Center ("NPAC") Wireless Change Orders would not be included in the NPAC Release 2.0 thus making it difficult for wireless carriers to meet the March 2000 implementation deadline. In response to this delay, the Local Number Portability Architecture ("LNPA") Working Group sent a letter to the regional Limited Liability Companies ("LLCs") explaining that the Commission's extension of the wireless LNP deadline "should not be mistaken as an opportunity to delay the NPAC implementation of Wireless Change Orders." See Letter to Presidents, Chairs, and PEs of LLCs, from LNPA Working Group Co-Chairs, Marilyn Murdock, Tom Sweeney, and Paula Jordan, dated September 13, 1998.

[27] These reports cover milestones critical to wireless LNP implementation, including standards for wireless inter-carrier communications, the wireless inter-carrier test plan, and NPAC performance throughout the development for wireless porting.

wireless industry would surely be noticed and rectified by the NANC. Contrary to MCI WorldCom's baseless accusations, however, the wireless industry is not sitting idly by awaiting Commission reprieves, and there has been, and will be, no need for the NANC to intervene.

In any event, requiring the top ten wireless carriers to make progress reports would not provide an accurate picture of the status of LNP implementation, and may divert resources away form the real work of LNP implementation. As explained below, all wireless providers must reconfigure their networks simultaneously for LNP. Thus, progress reports from only ten carriers would give a partial, and perhaps distorted, view of the industry's progress toward LNP. Moreover, instead of resulting in a public interest benefit, MCI WorldCom's proposal would do affirmative harm by requiring some companies to devote time and resources to drafting reports instead of continuing their efforts to implement LNP by the November 2002 deadline.

II. THE WIRELESS LNP EXTENSION WILL NOT IMPEDE THE EFFICIENT USE OF NUMBERING RESOURCES

Although Congress did not mention number conservation as a purpose for implementation of LNP, in its Forbearance Order, the Commission acknowledged the "compelling need" to improve the efficient use of numbering resources in order to counteract the increasing occurrence of number exhaust.[28] Thus, in rendering its public interest analysis of wireless LNP forbearance, the Commission examined how extending the implementation deadline may affect numbering resources.[29] To this end, the Commission sought comment from the industry on methods available to ensure the efficient use of numbering resources while

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[28] Id. at ¶ 44.

[29] Forbearance Order at ¶ 48.

wireless carriers are not LNP-capable.[30] Based on these comments, the Commission found that wireless carriers use their numbers efficiently and that, if necessary, certain non-LNP based conservation methods could be implemented in the absence of wireless LNP.[31] None of the instant petitioners advance points of fact or policy not already considered by the Commission.

A. The Wireless LNP Extension Will Not Exacerbate the Current Numbering Situation

The PAPUC makes several arguments regarding the effect the wireless LNP extension will have on number resource management, all of which rest on seriously flawed premises. For example, like MCI WorldCom, the PAPUC implies that the wireless industry, with Commission complicity, has been doing nothing to develop LNP capability. Thus, the PAPUC requests the authority to develop LNP systems in the event that the wireless industry is unwilling to self-police its LNP activities.[32]

The PAPUC's argument fails on a number of levels. First, as noted in the preceding section, the wireless industry has been diligent in its efforts to implement LNP and is making rapid progress in this regard.[33] Moreover, the suggestion that states should be allowed to countermand Commission orders and deadlines if, in their view, carriers are not working quickly enough makes no sense. Wireless number portability cannot be mandated on a state-by-state basis because roaming is impossible unless all wireless carriers are LNP-capable. As the timeline attached as Exhibit A demonstrates, the systems development and testing necessary for

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[30] Id. at ¶ 45. Moreover, the Commission found that number utilization data showed that wireless carriers use a high percentage of their allocated numbers. Id.

[31] Id. at ¶ 47.

[32] PAPUC Petition at 9.

[33] See supra page 8.

LNP implementation will not be complete until the second quarter of 2002, making industry-wide implementation possible by November 24, 2002. Given the technical constraints associated with roaming, state commissions cannot unilaterally order wireless providers in their states to accelerate this schedule.

In any case, as the record demonstrates, the wireless LNP extension will have a negligible impact, if any, on the rate of NPA exhaust because wireless providers use numbers efficiently. Unlike wireline carriers, wireless carriers do not need to obtain numbers in every rate center in which they expect to do business because they can serve customers over a broad geographic area from a limited number of resources. In addition, the evidence shows that wireless carriers administer their number inventories responsibly.[34/]

The PAPUC does not dispute this efficiency. Instead the PAPUC cites some statistics from its own state, which, if not read carefully, suggest that wireless carriers are single-handedly causing number exhaust. Specifically, the PAPUC states that immediately after the 724 area code was introduced in Pittsburgh, one carrier asked for and received 82 CO codes and another received 31 CO codes.[35/] The PAPUC fails to disclose, however, that only 13 wireless carriers operate in the 724 area code, and that none has codes in more than 12 of the 161 rate centers in

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[34/] AWS opens a new NXX only when those open have a high utilization rate; returns codes when possible in jeopardy situations; and employs sound 1000s block number management practices (in anticipation of eventual pooling). In addition, wireless carriers, including AWS, typically use shorter aging intervals than most telecommunications carriers, thus ensuring that numbers get "recycled" as quickly as possible.

[35/] Id. at 4.

the area. Thus, the CO Code allotment that the PAPUC finds so objectionable cannot be attributed to wireless carriers.[36]

States are understandably concerned about the rate of area code exhaust, and are reasonably apprehensive about actions they perceive will exacerbate the current numbering situation. There is no basis in the record to find, however, that providing wireless carriers with the time necessary to develop and implement LNP technology would have such consequences. The Commission has commenced a rulemaking proceeding to establish national pooling standards, and as soon as that process is complete, pooling can proceed without the immediate participation of wireless carriers.[37] AWS and its parent company, AT&T Corp., have consistently voiced their support for a national pooling solution, and stand ready to assist in the development of standards.[38] Until wireless carriers are able to participate in pooling, AWS simply requests that non-LNP-capable carriers be ensured timely access to full NXX codes in a pooling environment.

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[36] The experience in the 724 area code is not unique. By way of further example, in the 617 area code, which has 30 rate centers, CMRS providers have NXXs in 3 rate centers or less, with the exception of Southwestern Bell Mobile which has numbers in 13 rate centers.

[37] Numbering Resource Optimization, Notice of Proposed Rulemaking, CC Docket No. 99-200 (rel. June 2, 1999).

[38] In fact, AT&T has recently gone on record in support of state-ordered limited mandatory interim thousands block pooling plans. Comments of AT&T Corp. on California Public Utilities Commission's Petition for Additional Authority to Implement Number Conservation Measures, NSD File No. L-98-136 at 2 (filed June 14, 1999). See also Comments of AT&T Corp. on Florida Public Service Commission's Petition for Additional Authority to Implement Number Conservation Measures, NSD File No. L-99-33 at 6-7 (filed May 14, 1999); Comments of AT&T Corp. on Maine Public Service Commission's Petition for Additional Authority to Implement Number Conservation Measures, NSD File No. L-99-27 at 7 (filed May 3, 1999); Comments of AT&T Corp. on Massachusetts Department of Telecommunications and Energy's and New York State Department of Public Service's Petitions for Additional Authority to Implement Number Conservation Measures, NSD File Nos. L-99-19, L-99-21 at 11-12 (filed Apr. 5 1999).

In the NANC NRO proceeding, the Commission is also examining various non-LNP-based conservation measures that, if found to be necessary, may be implemented during the period in which wireless carriers do not have LNP capability. Neither the PAPUC nor any other party has supplied a valid rationale, however, for sidestepping that on-going proceeding by accelerating the LNP roll-out date or imposing new obligations on wireless carriers. The appropriate number optimization measures for all carriers can more appropriately be developed in a comprehensive fashion and, accordingly, AWS urges the Commission to conclude the NANC NRO proceeding as expeditiously as possible.

B. Pooling in the Absence of Full Wireless LNP Would Divert Resources from the LNP Implementation Effort

GTE suggests that pooling can be deployed in the absence of full wireless LNP (i.e., without an MIN/MDN split), but fails to take into account the technical and practical limitations that substantially reduce the plan's feasibility. In particular, to participate in pooling, all wireless carriers in a pooled rate center must be equipped to do their own queries, i.e., the wireless switch must be able to recognize that an NXX is portable and then be able to launch a query to determine proper call routing. Carriers not presently equipped with Local Routing Number ("LRN") LNP software would be forced to make system upgrades that, depending on vendor capability, may not be immediately available.[39] Therefore, even if the requisite resources were devoted to implementing GTE's pooling proposal, it could not be implemented before late in the

[39] For instance, Motorola wireless switches are not currently capable of recognizing that an NPA NXX is portable and may not have that capability for more than two years. Although some wireless carriers have installed the required LRN software, it would be competitively inequitable to require only those carriers to bear the carrier-specific costs of modifying their administration systems to accommodate management, tracking, and forecasting of thousands blocks, while exempting their direct competitors in the same market from such obligations.

second quarter of 2002. As the schedules attached as Exhibit B show, GTE's wireless number pooling would precede the LNP deployment deadline by only a few months. In AT&T's view, requiring the industry to change course and implement a solution that, in the long run has far fewer benefits for consumers and carriers than LNP, makes little sense.

GTE's solution is also cumbersome from a technical standpoint because only one wireless provider could operate in any given NPA NXX (i.e., a wireless carrier could only pool numbers with wireline carriers, not other wireless carriers). This is because most North American wireless technologies (AMPS, TDMA, and CDMA) currently base registration, call processing, provisioning, customer care, and billing upon a single number for the subscriber – the MIN. While implementation of number portability will require a split of the MIN and MDN, attempting to share an NXX (or MIN) block among various wireless carriers prior to this split would breach the integrity of the registration process and disrupt roaming. Accordingly, under GTE's proposal, only one wireless carrier in a given NPA NXX could be the Local Exchange Routing Guide assignee and, as such, be responsible for all functions of the code holder.[40/]

CMRS implementation of thousands-block pooling before establishment of full wireless LNP would fruitlessly divert resources away from the LNP deployment effort. Meeting the November 214, 2002 deadline for LNP implementation already has, and will continue to,

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[40/] GTE's solution would also require amendments to the pooling administration guidelines that reflect the inability of wireless carriers to port assigned numbers within contaminated thousands blocks.

command a tremendous amount of capital and human resources.[41] To shift resources from the LNP effort to implement GTE's pooling solution would jeopardize the industry's ability to satisfy this deadline. In light of the greater benefits of LNP and the proximity of the implementation dates for the two solutions, it would be more efficient for carriers to continue on the course they have already commenced.

CONCLUSION

For the foregoing reasons, the Commission should reject the instant petitions for reconsideration. The Commission considered the record and reasonably decided that an extension of the deadline for wireless LNP would serve the public interest. None of the petitioners presents evidence of new or changed circumstances that warrant revisiting that decision.

Respectfully submitted,

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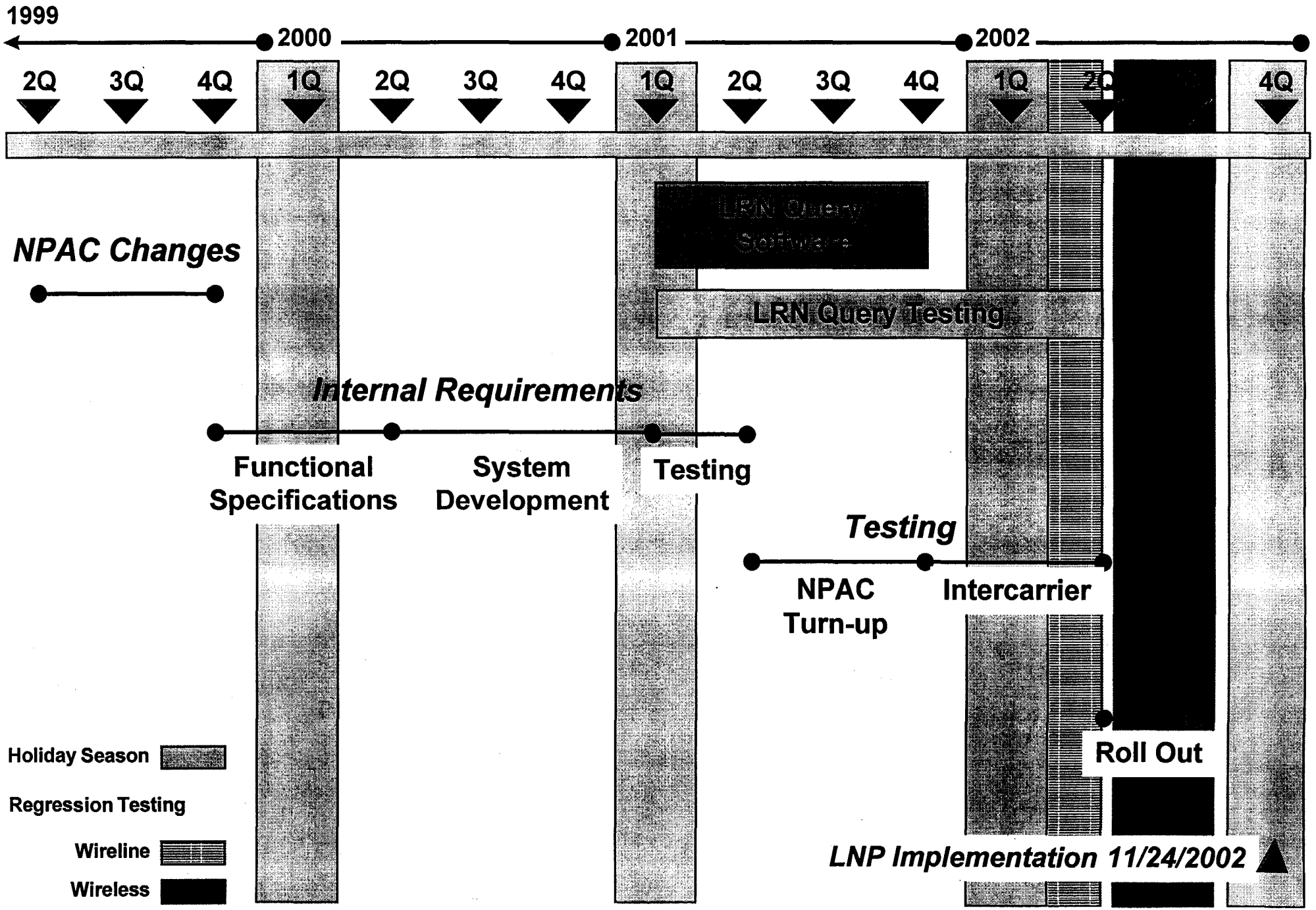
[41] As Exhibit A shows, wireless LNP will be developed and deployed pursuant to a rigorous schedule. Integration testing of network elements subsequent to the MIN/MDN split will last from early 2001 well into the third quarter. Inter-carrier testing of full wireless LNP will begin in August of 2001 and last until June 2002. Only upon completion of this testing can full wireless LNP be deployed.

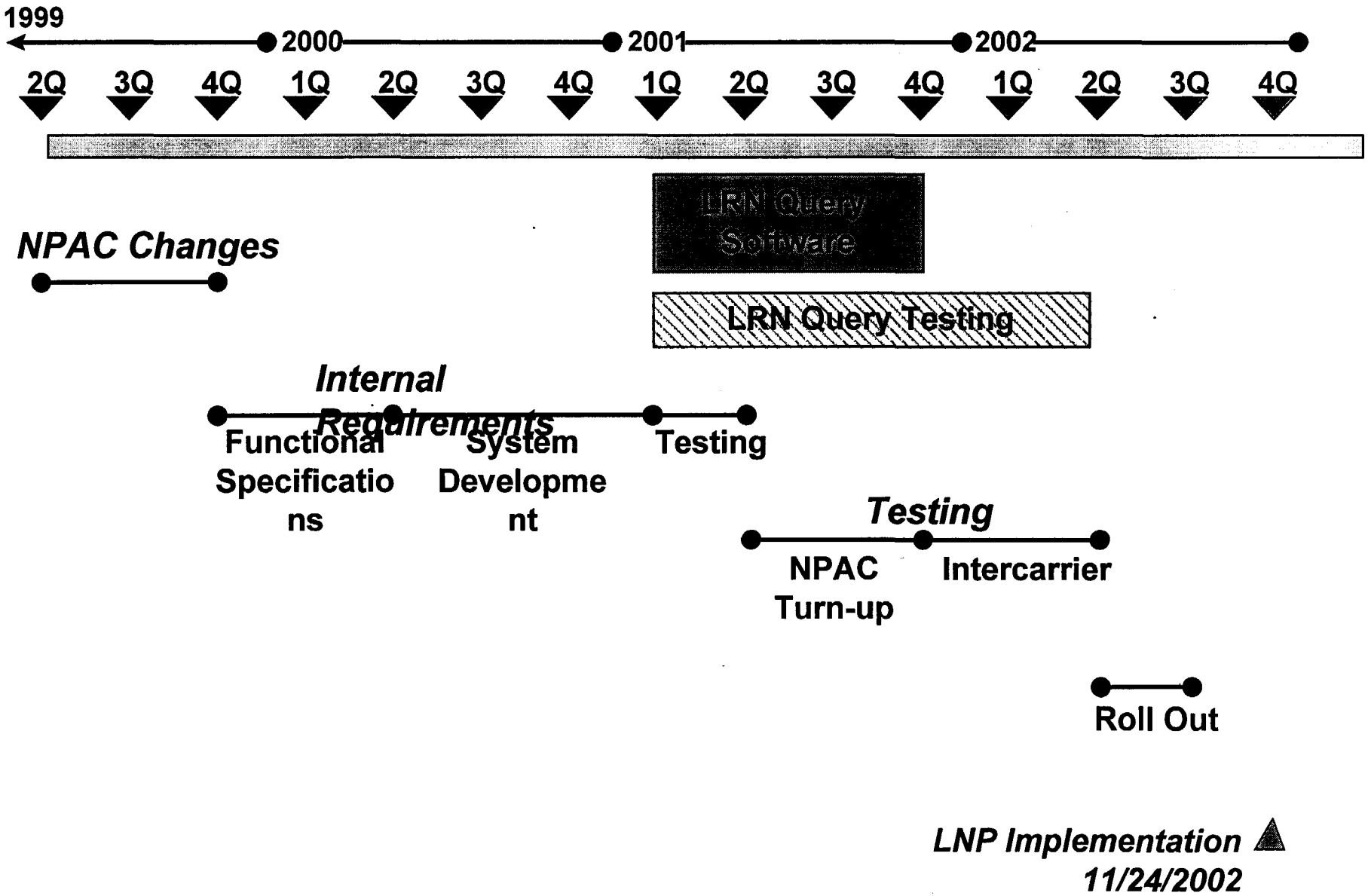
A

Wireless Number Portability
Timeline - Phase 2

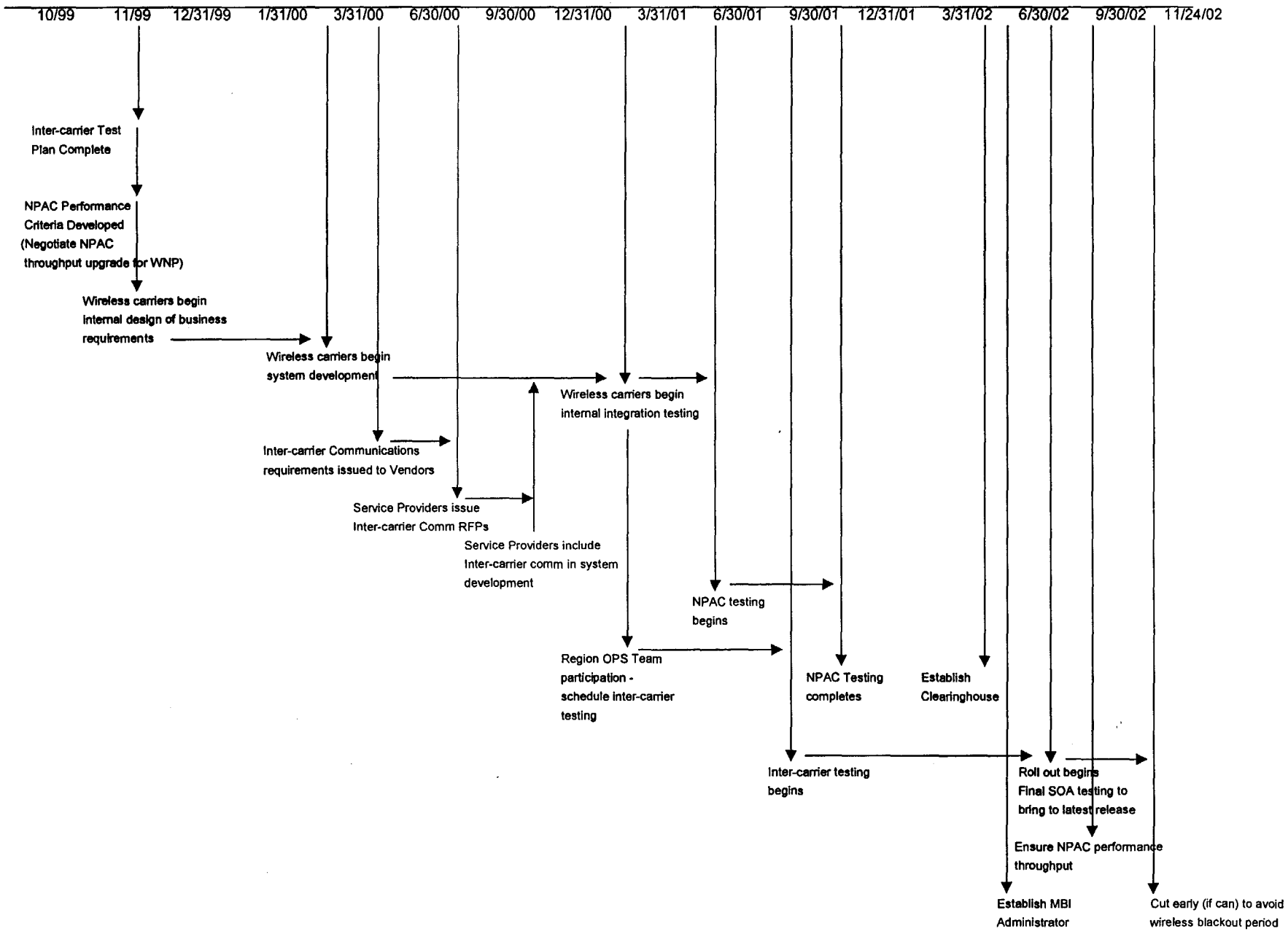


B

Wireless Number Pooling Timeline



Overall Wireless Number Portability Timeline



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I, Teresa S. Kadlub, hereby certify that on this 25th day of June, 1999, I caused copies of the foregoing "Opposition of AT&T Wireless Service, Inc." to be sent to the following by hand delivery* or by first class mail:

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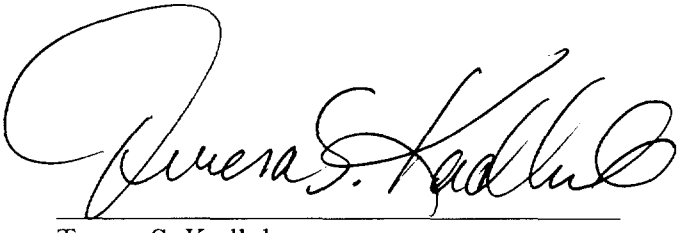

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