

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

ORIGINAL

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. <u>96-45</u>
Universal Service)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Forward-Looking Mechanism)	CC Docket No. 97-160
for High Cost Support)	
for Non-Rural LECs)	

JUL 20 1999

COMMENTS OF THE WESTERN ALLIANCE

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List A B C D E

TABLE OF CONTENTS

Summary.....ii

COMMENTS OF THE WESTERN ALLIANCE.....1

The Western Alliance.....1

Statement of Position.....3

Adjustments To Transitional Universal Service Fund.....5

Core Universal Service Principles.....7

Cost-Based Benchmarks.....11

Use of Universal Service Support To Maintain
Reasonably Comparable Urban/Rural Rates.....12

Rejection of 25/75 Federal/State Funding Proposal.....13

Rural Telephone Company Self-Certifications.....14

Hold Harmless Approach.....15

Deferral Of Rural Telephone Company Changes
Until Completion Of Commission Reviews.....16

Conclusion.....17

Summary

The Western Alliance requests that the Commission take no action regarding the universal service mechanism for non-rural carriers that directly or indirectly reduces or limits the scope or size of the present or future universal service mechanisms for rural telephone companies. In particular, the Western Alliance requests that the Commission reiterate that the transitional USF support of rural telephone companies will not be reduced, and that any and all necessary adjustments will be made to the existing USF (including, the existing interim USF "cap" and Section 36.601(c) capping formula) to ensure that the transfer of the non-rural carriers and their working loops from the existing USF on January 1, 2000 does not substantially reduce the per-loop transitional USF support of rural telephone companies during 2000 and future years.

The Western Alliance supports: (1) the Commission's increased emphasis upon the core statutory principles of reasonable comparability, affordability and sufficiency; (2) the Commission's proposed retention of a cost-based benchmark (and rejection of a revenue benchmark), if such benchmark continues to be comprised of actual costs; (3) the Commission's recognition that the purpose of universal service support mechanisms is to maximize participation by all Americans on the public switched network (rather than reduction of access charges for interexchange carriers); (4) the Commission's rejection of a 25 percent limit on federal universal service support; and (5) the Commission's proposed elimination of annual self-certifications by rural telephone companies. It

opposes the imposition of proxy models and forward-looking costs upon rural telephone companies, as well as the implementation of portability rules that artificially encourage "cherry-picking" in rural towns. The Western Alliance supports the implementation of a "hold harmless" system based upon a carrier-by-carrier approach, but opposes "hold harmless" systems based upon a state-by-state approach. Finally, it requests that the Commission defer any further modification of its universal service mechanisms for rural telephone companies until it completes its scheduled review in 2003 of the non-rural carrier system.

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COMMENTS OF THE WESTERN ALLIANCE

The Western Alliance hereby comments in response to the Commission's Seventh Report and Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45, Fourth Report and Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking, FCC 99-119, released May 28, 1999 (R&O), and its Further Notice Of Proposed Rulemaking, FCC 99-120, released May 28, 1999 (FNPRM).

The Western Alliance

The Western Alliance is a consortium of the member companies of the Western Rural Telephone Association (WRTA) and the Rocky Mountain Telecommunications Association (RMTA). It represents approximately 250 rural telephone companies serving sparsely populated farming and ranching areas, remote mountain and desert communities, and Native American reservations west of the Mississippi River. These generally are high-cost, low-revenue areas that the former Bell System ignored or declined to serve during the construction and development of the United States telecommunications network.

Western Alliance members are predominately small businesses. Most serve less than 3,000 access lines, and have only a fraction of the assets and revenues of the price cap local exchange carriers (LECs). Their small size precludes realization of significant economies of scale, and they have per-subscriber loop costs and switching costs far in excess of the national average. The typical member serves less than 500 subscribers per exchange and less than 3.24 subscribers per route-mile, and has been required by its "carrier of last resort" status to install and maintain lengthy loops (10-to-25 miles, and sometimes as much as 40-to-50 miles) over rough and unpopulated terrain to serve remote customers.

Because of their small size, high costs and limited subscriber and revenue bases, Western Alliance members rely significantly upon existing federal access charge and Universal Service Fund (USF) revenues. Many Western Alliance members receive between 50 percent and 75 percent of their total revenues from interstate access charges and federal USF support.

Notwithstanding their geographic and economic disadvantages, Western Alliance members have long provided quality telecommunications services to their rural customers at reasonable rates. However, their ability to maintain this level of performance in the future depends precariously upon Commission and state regulatory policies, for these small companies do not have the resources to withstand sharp revenue reductions or fluctuations without curtailing investment and services, or increasing local service rates beyond generally affordable levels.

Statement Of Position

The Western Alliance recognizes that the R&O and FNPRM address on their face only the universal service mechanism for non-rural carriers. Moreover, some Commissioners have stated publicly that the rules and mechanisms adopted herein will not be applied to rural telephone companies.

The Western Alliance does not doubt these assurances. It hopes that the Commission will focus upon the unique history, circumstances and roles of rural telephone companies when it reviews their universal service programs at a later date, and that the Commission will not subject rural telephone companies to the vagaries of proxy models and other economic experiments.

However, the rules and mechanisms adopted herein can impact Western Alliance members and other rural telephone companies in a substantial and adverse manner, even if they do not directly apply to them. For example, the formula for calculating the "interim" cap on the existing USF may result in a substantial reduction in the transitional universal service support distributed to rural telephone companies once non-rural recipients and their working loops are shifted on January 1, 2000 to the proposed proxy mechanism. Likewise, the Commission may formally or informally limit the aggregate size of the future federal high-cost fund(s) serving rural and non-rural telephone companies, and thereby limit future support for rural telephone companies to the extent it increases the support to be received by non-rural carriers. Or the Commission may adopt benchmark, hold harmless or other mechanisms

that may later be applied, in whole or substantial part, to limit the amount of universal service support distributed to rural telephone companies. Finally, there is some recent history -- for example, in the price cap carrier Access Reform (CC Docket No. 96-262) and rate of return carrier Access Reform (CC Docket No. 98-77) proceedings -- of rules previously adopted for large carriers serving as the predominant (and often identical) model for rules later proposed for smaller carriers. Consequently, the Western Alliance believes that it is both prudent and necessary to comment at this time upon various aspects of the R&O and FNPRM.

The Western Alliance requests that the Commission take no action (and adopt no generally applicable principle or mechanism) herein that directly or indirectly reduces or limits the scope or size of the transitional or future Universal Service programs applicable to rural telephone companies. Whereas the Western Alliance will address all of the Universal Service issues applicable to rural telephone companies at an appropriate future date, it comments on the following specific issues at this time:

- (1) it requests clarification that the scheduled January 1, 2000 transfer of non-rural carriers from the existing USF to a new proxy mechanism will not, via changes in the now five-year old "interim" cap on the existing USF, substantially reduce the total transitional universal service support distributed to rural telephone companies;
- (2) it supports the Commission's increased emphasis upon the core statutory principles of reasonable comparability, affordability and sufficiency in its implementation of its universal service responsibilities;
- (3) it supports the Commission's continued use of a cost-based benchmark (and rejection of a revenue benchmark) to calculate and distribute universal service support;

- (4) it supports the Commission's recognition that the purpose of universal service support mechanisms is to maximize participation by all Americans on the public switched network by maintaining affordable local service rates, and not to reduce the interstate access charges paid by interexchange carriers;
- (5) it supports the Commission's rejection of a 25 percent limit on federal universal service support;
- (6) it supports the Commission's recognition that annual self-certifications by rural telephone companies offer no cognizable administrative benefits, while creating the danger that oversights or errors may deprive deserving carriers of critical revenues;
- (7) it opposes the imposition of proxy models and forward-looking cost constructs upon rural telephone companies, as well as the implementation of portability rules that artificially encourage "cherry-picking" in rural towns;
- (8) it supports the implementation of a "hold harmless" system based upon a carrier-by-carrier approach, but opposes "hold harmless" systems based upon a state-by-state approach because they violate the statutory requirements for a sufficient federal mechanism and are likely to result in the diversion of substantial universal service revenues from rural telephone companies to large carriers in some states; and
- (9) it requests that the Commission defer any further modification of its universal service mechanisms for rural telephone companies until it completes its scheduled review of the non-rural carrier system.

Adjustments To Transitional Universal Service Fund

The Commission repeatedly has assured rural telephone companies that their high cost support will continue unchanged during the present transition period. FNPRM at p. 4, n.3; Report And Order (Federal-State Joint Board on Universal Service), CC Docket No. 96-45, 12 FCC Rcd 8776, 8889 (1997).

However, it appears that adjustments to the "interim" cap on the existing USF, as a result of the transfer of non-rural carriers

to a new "proxy" mechanism on January 1, 2000, may substantially reduce the transitional USF support distributed to rural telephone companies. Data submitted by the Universal Service Administrative Company (USAC) in April, 1999 indicates that rural telephone companies would have suffered a \$36 million reduction in their capped USF support if non-rural carriers had been transitioned to the new universal service mechanism on July 1, 1999. See Universal Service Administrative Company, Federal Universal Service Programs, Fund Size Projections & Contribution Base for the Third Quarter 1999 at p. 6, n.20 (April 30, 1999). This specific reduction was averted when the Commission postponed the proxy implementation date to January 1, 2000.

However, rural telephone companies may be subjected to similar, substantial USF reductions as a result of the scheduled January 1, 2000 transfers. One concern is that removal of the working loops of the non-rural carriers may disproportionately impact the Section 36.601(c) [of the Commission's Rules] capping formula, which caps the existing USF on the basis of changes in the number of working loops during the previous calendar year. Another concern is that the transfer of larger non-rural carriers out of the existing USF will eliminate the present averaging of the lower Section 36.631(c) [of the Commission's Rules] expense adjustments received by larger non-rural carriers with the larger Section 36.631(c) expense adjustments received by smaller rural telephone companies, and cause a significantly greater amount of the current USF support received by rural telephone companies to be reduced by

the cap.

The Western Alliance has opposed, and continues to oppose, the existing "interim" cap as a violation of the "sufficiency" requirement of Section 254(b)(5) of the Act. The Commission should terminate the existing "cap" immediately, or at the latest on January 1, 2000, when the non-rural carriers receiving universal service support are moved from the existing USF to the proposed new mechanism.

If the Commission, for any reason, retains the "interim" cap on the existing USF past January 1, 2000, it needs to take the steps necessary to preserve the status quo for rural telephone companies. Specifically, the Commission must make appropriate adjustments to the existing USF and to the existing Section 36.601(c) capping formula, to ensure that the transfer of the non-rural carriers and their working loops from the existing USF does not substantially reduce the per-loop transitional USF support distributed to rural telephone companies during 2000 and ensuing years.

Core Universal Service Principles

The purpose of the Telecommunications Act of 1996 was to accelerate the deployment of advanced telecommunications and information technologies and services to all Americans. Congress directed that this deployment be undertaken by the private sector to the maximum extent possible, and designated the removal of regulatory barriers and the promotion of competition as means for encouraging this result. At the same time, Congress realized that

service deployment (and not competition for competition's sake) was the true objective, and that other means for improving **service** would be necessary where competition did not develop or where it did not bring the desired service benefits. Therefore, with the failures of airline competition and deregulation in mind, Congress included Section 254 as a "safety net" to ensure that all Americans (particularly those in rural areas) will have access to the telecommunications and information services essential for their participation in the society and economy of the 21st Century, whether or not competition develops in their areas.

The core principles of the new statutory universal service are that quality services must remain available at just, reasonable and affordable rates, 47 U.S.C. §254(b)(1); and that consumers in all regions must have access to telecommunications and information services reasonably comparable to those provided in urban areas at reasonably comparable rates, 47 U.S.C. §254(b)(3). In order to preserve and advance these goals, there must be specific, predictable and sufficient federal (and state) universal service mechanisms, 47 U.S.C. §254(b)(5).

The Western Alliance agrees with the Commission and the Joint Board that "a central purpose of the federal universal service support mechanisms is to enable rates in rural areas to remain reasonably comparable to rates in urban areas" (R&O, para. 30). In fact, Congress required not only the rates in rural areas, but also the telecommunications and information services available in rural areas, to be reasonably comparable to those in urban areas.

This principle recognizes that the value of the telecommunications network to all users increases with the number of people having effective access to its services, and that there are political and social (as well as economic) benefits of including rural as well as urban residents within the developing information economy.

The Western Alliance agrees with the Commission that "reasonable comparability" does not mean identical rates and services (R&O, para. 30), and that costs are the most important factor to be addressed in achieving reasonable comparability (Id., para. 32). However, any "fair range" of urban/rural rates and services must be kept as narrow as possible to ensure that all Americans have equivalent access to telecommunications services and resources wherever their families happen to reside. Likewise, costs entail real dollar investments and expenditures, and cannot be estimated accurately for rural telephone companies and many other carriers by proxy models based upon inapplicable technical assumptions and subjective economic principles.

The Western Alliance agrees with the Commission and the Joint Board that current rates for local service are generally affordable (Id., para. 38). It further agrees that "affordability" encompasses more than subscribership, and that the states are better equipped to determine which additional factors can and should be used to measure affordability within their boundaries at any given time (Id.).

Finally, to achieve reasonable comparability and maintain continuing affordability, the Commission must establish specific,

predictable (i.e., reliable and stable) and sufficient support mechanisms. Competition may someday come to Rural America, but thus far the only entities showing a perceptible and sustained interest in serving the vast majority of rural areas have been rural telephone companies and other incumbent local exchange carriers. In order to continue obtaining the financing and making the investments necessary to bring reasonably comparable services to their customers, rural telephone companies must have sufficient, stable and predictable revenues (including interstate access revenues and the specific, predictable and sufficient universal service revenues mandated by the Act). However, during recent years, the Commission's universal service, access reform and separations reform dockets have reduced or threatened reductions in critical interstate revenues, while at the same time the Commission has mandated additional investments and expenditures to comply with local number portability, four-to-six digit Carrier Identification Codes, caller ID, 800 database, originating line screening, Communications Assistance for Law Enforcement Act (CALEA), and dialing parity requirements.

In sum, the Western Alliance hopes that the Commission and Joint Board statements in the R&O and FNPRM constitute their increased recognition that the Universal Service system is an essential partner with competition in bringing basic and advanced telecommunications and information **services** to all Americans. The Western Alliance asks only that the Commission fully and fairly implement Section 254 of the Act by establishing sufficient,

reliable and stable federal mechanisms that ensure the availability of quality, affordable and reasonably comparable services and rates in rural areas.

Cost-Based Benchmarks

The Western Alliance supports the R&Q's adoption of a cost-based (rather than a revenue-based) benchmark for calculating and distributing federal high-cost support, if such cost-based benchmark is based upon actual costs (rather than theoretical "proxy-based" costs). As stated in its July 17, 1997 Petition For Reconsideration in this proceeding, the Western Alliance believes that a revenue-based benchmark would unduly reduce support for rural telephone companies because it would be skewed by the higher per-customer revenues generated by carriers in urban areas. In other words, the more and more expensive services purchased by the majority of American residing in urban areas, the less support would be available for local service in high-cost rural areas and the further the nation would drift from the statutory goal of reasonably comparable services and rates in rural and urban areas. The Western Alliance agrees with the Commission and the Joint Board that a cost-based benchmark provides a better gauge for identifying areas in need of support (R&Q, para. 62).

For most Western Alliance members, the present 115 percent and 150 percent benchmarks (calculated on the basis of the nationwide average for actual loop costs) in Section 36.631(c) of the Rules have resulted in adequate high-cost support for their loops. The Western Alliance believes that these benchmarks continue to be fair

and reasonable measures of above-average costs, and that they are equally applicable to other components of the network necessary to provide supported services.

**Use Of Universal Service Support
To Maintain Reasonably Comparable Urban/Rural Rates**

The Western Alliance vigorously has opposed proposals in the Commission's Access Reform and Separations Reform proceedings to employ the federal universal service support received by rural telephone companies and other local exchange carriers solely or primarily as an offset to reduce their interstate access revenue requirements. If adopted, these proposals would transform federal universal service support into an access cost reduction device for IXCs and eliminate its capability to maintain affordable local service rates.

The Western Alliance is encouraged that the R&O has clarified these offset proposals, and has limited them to apply only to some of the implicit support that is presently contained in interstate access charges and that may be converted at a future date to explicit universal service support. The Western Alliance applauds the Commission's determination that the federal universal service support provided to ensure the reasonable comparability of intra-state rates is wholly distinct from, and outside the scope of, these offset proposals (R&O, para. 123 and n.297).

Federal and state universal service support must be sufficient to maintain reasonably comparable and affordable local services and service rates in high-cost rural areas. This statutory requirement of "sufficiency" supersedes, and is wholly distinct from, concerns

regarding potential "double recovery" of the same costs from universal service and access charge mechanisms. As long as the requisite "sufficient" support is furnished by present and future universal service mechanisms, Western Alliance members do not expect or request additional universal service support or recovery of the "same" costs from universal service and access charge mechanisms.

Rejection Of 25/75 Federal/State Funding Proposal

The Western Alliance previously opposed the Commission's proposal to fund only 25 percent of the universal service mechanism as a violation of the predictability and sufficiency requirements of Section 254(b)(5) of the Act. It therefore supports the Commission's rejection of the proposal, and agrees that it would have unduly burdened certain high-cost states (R&O, para. 64).

The Western Alliance agrees that states have a role in supporting universal service that is separate and distinct from the statutory federal obligation. It believes that at least seven Western states have taken substantial steps to establish their own universal service mechanisms. The Western Alliance is not presently able to propose a reliable fixed per-line dollar amount or other formula to measure a state's ability to support its high-cost areas. However, it believes that any formula established by the Commission must be carefully formulated so that it will not penalize the states which have already implemented universal service mechanisms or reduce the net support received by rural telephone companies in those states.

Whatever measurement method is selected, the Commission must keep in mind that the critical factor is the availability of reasonably comparable and affordable service for all Americans, and not merely an acceptable allocation of support costs among federal and state universal service mechanisms. Therefore, the Commission should take express responsibility for ensuring that aggregate federal and state universal service support is sufficient in all high-cost areas, and stand ready to make up the deficiency where a state is unable to bear the costs otherwise assigned to it under the Commission's applicable formula.

Rural Telephone Company Self-Certifications

The Western Alliance supports the Commission's proposal (FNPRM, para. 246) to eliminate the current annual rural telephone company self-certification filing requirement for most small carriers (i.e., those serving under 100,000 access lines). If the proposal is adopted, small carriers will be required to file an annual self-certification letter only if their status has changed since their last filing.

The Western Alliance agrees that the status of most rural telephone companies can be verified easily with publicly available data, and that relaxation of the present annual filing requirement would lessen the administrative burdens borne by many rural telephone companies as well as those borne by the Commission's staff (Id.). The Western Alliance is particularly concerned that an inadvertent oversight or administrative error could place a bona fide rural telephone company into universal service and other

regulatory mechanisms that were not designed or intended for small carriers, and that would impair or destroy its ability to continue serving the customers relying upon it.

Hold Harmless Approach

As the Commission recognized in its Report And Order (Federal-State Joint Board on Universal Service), 12 FCC Rcd 8776, 8936 (1997), changes in revenues and support flows disproportionately affect the operations of rural telephone companies. This is because most rural telephone companies are extremely small firms which lack the size, resources, credit lines, diversified service offerings and economies of scale to withstand significant (to them) revenue reductions.

Because of the vulnerability of rural telephone companies to universal service support reductions, the Western Alliance vigorously supports a carrier-by-carrier hold harmless approach, and opposes a state-by-state hold harmless approach. A carrier-by-carrier approach will ensure that no rural telephone company or other carrier will suffer an immediate and substantial reduction of its existing federal universal service support, and that its customers will not be subjected to significant rate increases or service impairments.

In contrast, a state-by-state approach may result in substantial economic dislocations for rural telephone companies and their customers. This is particularly true if a non-rural carrier mechanism based upon wire centers results in substantial increases in the federal universal service support received by large

carriers. If the latter case, a state "hold harmless" approach could implement substantial support increases for larger carriers at the expense of less politically influential small carriers by allowing the support received by the smaller carriers to decrease substantially.

Moreover, a state-by-state approach violates the requirement in Sections 254(b)(5) and 254(e) of the Act that the **federal** universal service mechanism be specific, predictable and sufficient.

The Western Alliance emphasizes that its support of a carrier-by-carrier hold harmless approach does not constitute support for any sort of cap ("interim" or otherwise) upon the overall size of any federal universal service mechanism. The Section 254(b)(5) requirement of "sufficiency" requires the federal mechanism to be as large as necessary to accomplish its statutory service mandates (*i.e.*, quality, affordability and reasonable comparability). A "cap" set at any amount less than the amount sufficient to meet these goals is unlawful.

**Deferral Of Rural Telephone Company Changes
Until Completion Of Commission Reviews**

The Commission and the Joint Board agree that the 1996 Act requires the Joint Board periodically to recommend modifications in the federal universal service mechanism, and in the definition of the services supported by it (R&O, paras. 93-94). The Commission has determined that the Joint Board shall, on or before January 1, 2003, comprehensively examine the operation of the high-cost universal service mechanism implemented for non-rural carriers, including the hold harmless mechanism (Id.).

The Western Alliance proposes that the Commission focus its universal service revision efforts from now until January 1, 2003 upon the implementation, examination, and refinement of its mechanism for non-rural carriers. Only after the Commission and Joint Board have developed a fully functional mechanism for non-rural carriers and verified that such model is satisfying the statutory universal service goals, should they proceed to develop a new universal service mechanism for the more vulnerable rural telephone companies.

Conclusion

The Western Alliance requests that the Commission take no action regarding the universal service mechanism for non-rural carriers that directly or indirectly reduces or limits the scope or size of the present or future universal service mechanisms for rural telephone companies. In particular, it requests that the Commission reiterate that the transitional USF support of rural telephone companies will not be reduced, and that any and all necessary adjustments will be made to the existing USF (including, the existing Section 36.601(c) capping formula) to ensure that the transfer of the non-rural carriers and their working loops from the existing USF on January 1, 2000 does not substantially reduce the per-loop trans-itional USF support of rural telephone companies during 2000 and ensuing years.

In addition, the Western Alliance supports (1) the Commission's increased emphasis upon the core statutory principles of reasonable comparability, affordability and sufficiency; (2) the

Commission's proposed retention of a cost-based benchmark (and rejection of a revenue benchmark); (3) the Commission's recognition that the purpose of universal service support mechanisms is to maximize participation by all Americans on the public switched network (rather than reduction of access charges for IXCs); (4) the Commission's rejection of a 25 percent limit on federal universal service support; and (5) the Commission's proposed elimination of annual self-certifications by rural telephone companies. It opposes the imposition of proxy models and forward-looking costs upon rural telephone companies, as well as the implementation of portability rules that artificially encourage "cherry-picking" in rural towns. It supports the implementation of a "hold harmless" system based upon a carrier-by-carrier approach, but opposes "hold harmless" systems based upon a state-by-state approach. Finally, it requests that the Commission defer any further modification of its universal service mechanisms for rural telephone companies until it completes its scheduled review in 2003 of the non-rural carrier system.

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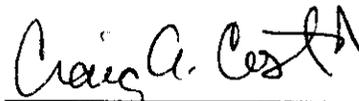
July 23, 1999

CERTIFICATE OF SERVICE

I, Craig A. Costa, hereby certify that I am an employee of the law firm of Blooston, Mordkofsky, Jackson & Dickens and that a copy of the foregoing "**COMMENTS OF THE WESTERN ALLIANCE**" was served this 23rd day of July 1999, by First Class U.S. Mail, to the persons listed below.

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