

1 I guess my question is, can a private standard-  
2 setting body avoid doing those things? Or perhaps more  
3 realistically, how can the danger of those things happening  
4 be kept to the absolute minimum?

5 MR. HART: Paul Hart, USTA. Are you concerned  
6 that the fact that the FCC might explicitly make a  
7 delegation to a particular body would increase their risk of  
8 antitrust concern? I'm not sure that it would, because of  
9 the way things go in this industry and the fact that the  
10 ANSI rules were specifically developed in order to limit  
11 those kinds of exposures.

12 So I'm not sure that the explicit delegation of a  
13 responsibility like that to an industry body would increase  
14 the risk. There's always some risk no matter what happens  
15 when competitors sit down and start to talk to each other  
16 about anything that involves their businesses. And that's  
17 why that whole structure was developed.

18 And in addition, if the Commission -- if somebody  
19 from the Commission staff participated in the process,  
20 certainly, I would think that the Commission's sensitivity  
21 to any such activities would trigger way before an antitrust  
22 concerns.

23 So my reaction to that is that it's something you  
24 have to pay attention to and be sensitive about, but so long  
25 as the people in the industry -- a wide range of folks from

1 the industry are willing to come together and work on those  
2 issues in a body that clearly is ANSI-accredited and clearly  
3 is maintaining all of the process and procedure that it had  
4 to demonstrate in order to win that accreditation, I would  
5 say that that's as good as you can do in the environment we  
6 live in today.

7 MR. BERRESFORD: Mr. Salinas?

8 MR. SALINAS: Jimmy Salinas, SBC. I'll mirror  
9 what Paul stated. But to your question, yes, everything is  
10 possible that you said. You could have a committee that was  
11 formed strictly of -- on one focus issue and write it that  
12 particular way. There's two ways to get around that. You  
13 can make the FCC part of that committee, or you can have the  
14 FCC dictate who is going to be the membership on the  
15 gatekeeping committee. And let the gatekeeping committee  
16 police the other committees. That will alleviate those two  
17 issues.

18 MR. BERRESFORD: Mr. Pinkham?

19 MR. PINKHAM: Just a clarification for my own  
20 benefit. Are you concerned that the inequity would happen,  
21 or that there would be a lawsuit resulting from it?

22 MR. BERRESFORD: The first.

23 MR. PINKHAM: Are you concerned that this inequity  
24 you talked about would actually happen? Is that your  
25 concern? Or are you concerned that there would be a lawsuit

1 from that inequity?

2 MR. BERRESFORD: I think the first.

3 MR. PINKHAM: Okay.

4 MR. BERRESFORD: Because that's what will harm  
5 consumers.

6 Mr. Hurst?

7 MR. HURST: Yes, Bill Hurst with CCL. No, I think  
8 you have some very valid concerns. Having worked in the  
9 SDOs, you see those sorts of things. I mean, there's great  
10 pressures to make sure that your side wins out. And coming  
11 from a very small business, it's very difficult to provide  
12 that kind of support to make sure that your views are heard.  
13 And so I think they're very valid concerns. And that's why  
14 we have put forward, we think that it's very important that  
15 the FCC have an involvement.

16 And it doesn't mean that an FCC person has to come  
17 to every meeting of an SDO, but as long as there is some  
18 oversight there, they are aware of what that group is doing,  
19 and that the final product at the end of the day that gets  
20 referenced, it somehow goes through the FCC for that final  
21 recognition, whether we actually publish the date of the  
22 issue of the rules -- of the standard within the rules, or  
23 if we go through some kind of public notification process.  
24 As long as the FCC has an involvement, I think that would be  
25 sufficient to make sure that it's handled properly.

1 MR. BERRESFORD: Thank you.

2 MR. BIPES: John Bipes, Mobile Engineering. If  
3 the past 15 years is any indicator, I again have to speak to  
4 the tremendous consensus that has developed within TIA and  
5 particularly TR-41.9 with regard to the Part 68 rules.  
6 Chuck Berestecky's chairing that committee representing a  
7 very huge corporation. In more recent years, Anh Wride's  
8 chairing the committee being a very small, in comparison,  
9 company has meant a discontinuous -- a continued high level  
10 of integrity and objectivity that these committees have put  
11 forward.

12 And as Bill Howland has represented the FCC at I  
13 think every one of the quarterly meetings now since he has  
14 been with the FCC, it's been -- every indication I get is  
15 that this is about as good as it can get in a broken world.  
16 There's finally no evidence that policy can always and  
17 ultimately prevent perversion, but I think this is about as  
18 good as it gets.

19 MR. BERRESFORD: Mr. Pinkham?

20 MR. PINKHAM: Clint Pinkham, Thomson. The system  
21 not matter whatever it is can be flawed. And certainly an  
22 SDO can be dominated by one particular industry group or  
23 another. But then, frankly, so can the political system.  
24 So I guess you have to -- you pays your money and you take  
25 your choice.

1 MR. BERRESFORD: Thank you.

2 MR. SCHROEDER: Susan?

3 MS. MAGNOTTI: Okay, I a have a question,  
4 especially for TIA and CCO, I think. Assuming that we have  
5 a one- to two-page Part 68 and assuming that FCC  
6 participation in SDO or gatekeeper scenario, is there a need  
7 for an additional transition position in the form of a  
8 hybrid regulatory system between the current system and any  
9 new system that we set up?

10 MR. HURST: Bill Hurst with CCL. Be glad to  
11 comment.

12 You talk about a hybrid system. I don't think a  
13 hybrid system is going to be necessary. I think it will be  
14 a very smooth transition to be able to move what is in the  
15 technical requirements in Part 68 today into a standard that  
16 in produced, I think, by TIA would be an ideal candidate. I  
17 mean, that process can happen.

18 Once the decision is made for them to embark upon  
19 that task, they can get to work and I think very quickly  
20 respond and come up with a document that can be accepted.  
21 So I don't see a need for a transition or a hybrid during  
22 that transition.

23 MR. BERESTECKY: Chuck Berestecky. I concur with  
24 what Bill has said. I do think, though, that we're going to  
25 need to understand the direction from the Commission, too.

1 You're going to have to help and setting some guidelines  
2 that we would be working within. But I think that -- I know  
3 41.9 has done a lot of this work in the past. So I think  
4 that, yes, the transition would be very smooth and very  
5 easy.

6 MR. BISHOP: Trone Bishop, Bell-Atlantic. Just  
7 one comment, we would hope, of course, that you would keep  
8 the existing rules until the new standard became effective.

9 MS. MAGNOTTI: Any ideas? Yes?

10 MR. MCNAMARA: Bill McNamara, Bell-South. The  
11 Commission also has some outstanding issues that it has yet  
12 to act on. Particularly, one related to premises wiring.  
13 It was an NPRM a couple of years ago. There was no  
14 objection to any of the proposals there. I would assume the  
15 Commission will complete its work on that, hopefully, in the  
16 positive before any transition is made to any SDO. Thank  
17 you.

18 MS. MAGNOTTI: Any other comments? Yes?

19 MR. WHITESELL: Steve Whitesell, Lucent. There  
20 are other things going on right now, for example, NTR41. We  
21 have at least two petitions we're in the process or three  
22 petitions, I think, we're in the process of writing that  
23 would be petitions for rulemaking. We need to have some  
24 discussion I think about how that -- whether that should be  
25 done or whether that should just be incorporated perhaps

1 into the new rules.

2 Two of them are technical things. The stutter  
3 dial tone is one. Another one concerning the change in the  
4 hearing aid compatibility requirements to essentially adopt  
5 the new TIA standard to replace that outdated TIA standard.  
6 Those are two technical things. And then one, having to do  
7 with the conformity assessment process, which is more  
8 process-related.

9 But certainly the two technical ones are issues  
10 that we need to decide whether we should proceed with a  
11 petition for rulemaking, or should we just write it in to --  
12 you know, the SDO write it into its standard and adopt that  
13 method? Thank you.

14 MS. MAGNOTTI: John?

15 MR. SCHROEDER: Well, I actually had several,  
16 several questions. And I guess one thing about going last  
17 is that I've seen myself go down my list of questions and  
18 check them off as other people have asked them. So I don't  
19 know if that's a good thing or not. But I do still have a  
20 couple of questions.

21 One thing that the discussion of the SDOs reminds  
22 me a little bit of or the SDO process is what we have some  
23 of our other outside entities doing for us, one that I'm  
24 particularly familiar with is the TRS fund administrator,  
25 which is currently NECA and will be for the next four years.

Heritage Reporting Corporation  
(202) 628-4888

1 We just reappointed them.

2 They have an advisory council which advises them  
3 on funding issues. And there are a selected number of  
4 representatives from the disability community that TRS  
5 services. And I guess that reminds me kind of what we've  
6 been talking about here, that you might have a gatekeeper  
7 SDO and kind of a consortium of other committees or other  
8 SDOs that would work with that gatekeeper.

9 One thing that I don't think we've really touched  
10 on, though, is how this setup would be funded. In the TRS  
11 context, by law every carrier has to contribute to the  
12 funding of TRS. So it's in some ways a simpler question.  
13 The carriers contribute a certain amount. NECA distributes  
14 it -- keeps aside a small portion for the administrative  
15 costs and so on.

16 How would an SDO approach be funded? Would there  
17 be a -- I guess a required contribution by members of the  
18 industry? Anyone? Paul?

19 MR. HART: Paul Hart, USTA. I guess I'm more  
20 familiar with the way it goes on in the ATTA structure. And  
21 some of that is consensus forms. But I think you have the -  
22 - the group has the option to decide how it wants to be  
23 funded. In some cases, the sponsoring association or  
24 whatever just takes care of all the incidental expenses.  
25 And in some cases, people who come to those meetings are

1 asked to kick in a certain amount of money to defray those  
2 expenses.

3 There's work that the -- some of the ink groups  
4 are doing under the North American Numbering Council in  
5 which those contributions are made. So I don't -- I think  
6 the answer is that there's no fixed answer.

7 If the group is going to be designated as a group  
8 to deal with a certain segment of the standards process,  
9 figuring out how to do it and making it happen is part of  
10 the acceptance of that. And I think you might want to know  
11 how they decide to do it. But I would think that the thing  
12 to do would be leave that up to them to see how they want to  
13 make that happen.

14 MR. SCHROEDER: Chuck, did you have anything?

15 MR. BERESTECKY: I just mentioned, we did say --  
16 Chuck Berestecky. What we did say in ours was that  
17 nonmembers' participation, the only thing we would see there  
18 would be a charge for overhead -- administrative overhead.

19 The way it works in the TIA, if you are a member  
20 company, there is no charge to you to participate in the  
21 standards development work for technical committees. And  
22 there is only a nominal charge to those that are nonmembers,  
23 and even in some instances, those are waived.

24 So I think from a TIA perspective, I would see at  
25 most a little administrative charge for nonmembers.

1           MR. SCHROEDER: So I take it this wouldn't be a  
2 charge that would be burdensome to a very small  
3 manufacturer? You wouldn't --

4           MR. BERESTECKY: If we found it was burdensome,  
5 that would be up to the chair, like in chair 41. I have the  
6 option of waiving the fees, and I have done that.

7           MR. SCHROEDER: Okay.

8           MR. BERESTECKY: Because if I find that very  
9 important to the participation, I will waive the fee just to  
10 be sure that they will stay involved.

11          MR. SCHROEDER: Okay. That's reassuring. Thank  
12 you.

13          Bill?

14          MR. HURST: Yes. Bill Hurst with CCL. I think  
15 it's a valid concern as to what the costs are because, you  
16 know, TIA is very reasonable and has a good track record.  
17 But we don't know what the future brings. And so I think  
18 cost is an important question to raise.

19          Related to that, I also wonder who owns that  
20 standard at the end of the process, and what's the charge  
21 going to be? The SDO may decide to recoup all of their  
22 costs by charging a very high fee for the standard at the  
23 end of the day. And so I guess that would be a question I  
24 would have.

25          MR. SCHROEDER: Other comments, questions?

1 MR. BERRESFORD: Could you clarify what you meant  
2 by charging for the standard?

3 MR. HURST: Yes. For example, today, TIA produces  
4 the test method for Part 68 or the C63 standard produces the  
5 standard that we need to test -- that we need to follow to  
6 do testing for Part 15. We are required to buy that  
7 standard from the organization, the RODA. So TIA owns that  
8 standard. The TSP31, I think, costs \$250 to purchase that  
9 from their publisher.

10 Is there any safeguard or control on what that  
11 cost is?

12 MR. SCHROEDER: If I could just get a little more  
13 clarification on that. When you say purchase it from the  
14 publisher, who's purchasing it and for what purpose? I  
15 didn't quite follow that.

16 MR. HURST: Bill Hurst again. I have a test  
17 laboratory, so I need to test to that Part 68 standard. So  
18 I need a copy. To get a copy, I need to go to TIA to  
19 purchase the standard. Global Engineering is the one that  
20 publishes it for them. So I would call up Global  
21 Engineering documents and give my credit card number and pay  
22 them \$250, and I'd have the standard in two days.

23 MR. SCHROEDER: I see. Is that per test that you  
24 need to do, or is that one time?

25 MR. HURST: That would be for the entire document,

1 T31B.

2 MR. SCHROEDER: I see.

3 MR. HURST: And so my question is, who owns the  
4 standard? Is it the SDO? And is there any cost containment  
5 on the document?

6 MR. SCHROEDER: Right.

7 MS. MONTGOMERY: Could I address that?

8 MR. SCHROEDER: Yes.

9 MS. MONTGOMERY: This is Stephanie Montgomery with  
10 TIA. And TIA's obviously not the only SDO that sells their  
11 standard. T(1) does, as well, and we have developed joint  
12 standards in the past with T(1). Both the groups share the  
13 copyright, and they're priced the same by ANSI. ANSI also  
14 sells documents -- standards they've developed in the ANSI  
15 process, and they price them.

16 For TIA, there's a formula based on the note. How  
17 long the document is determines what the cost is. It's to  
18 cover the costs of publication and, partially, development.

19 So my understanding is this is standard practice  
20 within SDO development.

21 MR. SCHROEDER: Thank you. Yes? Gordon?

22 MR. GELLERMAN: Gordon Gellerman, Underwriters  
23 Laboratories. As I said before, we publish quite a few  
24 standards. Currently, we have over 700 in print. We do not  
25 charge anybody for participation in the standards

1 development process. We recoup whatever costs needs to be  
2 recouped based on the sale of the standards.

3 In many cases, actually, because of our public  
4 mission, we are even developing standards at a loss  
5 sometimes and using revenues from our certification  
6 operations to kind of boost up the bottom line to account  
7 for that. But sale of standards is the normal course of  
8 business for almost every standards developer.

9 I think it's interesting here, we're actually  
10 hearing from standards developers that are industry groups,  
11 like TIA is a trade association and they're also an SDO.  
12 But when you look at standards developers, maybe they're a  
13 little bit more like UL, like USTM and some of the NFPA that  
14 may have been mentioned already. Most of them are in  
15 exactly the same mode that UL is with no charge for  
16 participation in the consensus body writing the technical  
17 requirements, but a charge for the sale of the standard  
18 itself to recoup the cost. Thank you.

19 MR. SCHROEDER: Thank you. Let's see. I'm sorry.  
20 Trone?

21 MR. BISHOP: Trone Bishop, Bell-Atlantic. I just  
22 want to say that Committee T(1) has been looking into making  
23 all of their standards available electronically, free of  
24 charge. So there are bodies that are looking at trying to  
25 reduce the costs of standards.

1           One reason for doing so is often you can encourage  
2 the use of a standard by not charging for it or reducing the  
3 cost. But in the end, the only way they can do that is by  
4 assessing their members a fee to cover the publication  
5 costs.

6           MR. SCHROEDER: That makes sense. Yes?

7           MR. WHITESELL: Steve Whitesell, Lucent. Just so  
8 we have an order of magnitude here, the order of magnitude  
9 costs is a like a dollar a page. We're not talking \$10 a  
10 page or \$100 a page.

11          MR. SCHROEDER: Okay.

12          MR. WHITESELL: A 100-page document is \$100 more  
13 or less.

14          MR. SCHROEDER: Yes. I guess we wouldn't -- well,  
15 we would want to consider whether the cost would be  
16 prohibitive for a -- you know, a small test lab, for  
17 example. But that doesn't sound like it's the case  
18 generally.

19          There was someone in the audience.

20          UNIDENTIFIED PARTICIPANT: I'd like to make a  
21 quick point of clarification. In the case of Committee  
22 T(1), it has never published its own standards. ANSI  
23 publishes those standards and it's really a significant  
24 source of revenue for ANSI. So that's something else that  
25 probably needs to be factored into this.

1 MR. SCHROEDER: Thank you. Anyone else? Okay.

2 Before we wrap things up, I had I guess a couple  
3 of questions perhaps about FCC enforcement activities, what  
4 you're contemplating when you say that we should take  
5 strong, or play a strong enforcement role. I spent I guess  
6 nine years in one of the FCC's enforcement divisions, and I  
7 fully agree that that's one of the most important things  
8 that the Commission can do in any context really.

9 But here, I'm wondering what exactly you're  
10 thinking about when you use that phrase. There are FCC  
11 proceedings that are complaints that are similar to I guess  
12 lawsuits. There is a Part 68 complaint process. That's one  
13 of I think at least three or four that I know of in the  
14 Commission's rules, where a private complainant comes to us  
15 and then asks us to resolve a particular dispute.

16 The other kind of FCC enforcement action is an  
17 investigation somewhat more similar to say -- oh, I don't  
18 know, a criminal investigation. Now, the good thing about  
19 that is that the FCC takes on the most active role in  
20 prosecuting -- investigating and then prosecuting the case.  
21 Maybe the downside of that is that you can't insist that we  
22 do that, just like I can't insist that the police catch  
23 every speeding car that comes down my road.

24 What are you contemplating when you ask us to  
25 maintain or have a strong enforcement role? John?

1           MR. WAGNER: John Wagner, Lucent Technologies.  
2           Having worked as much in the Part 15 arena as the Part 68  
3           arena, I know it has been a concern of those people dealing  
4           with Part 15 issues in that -- and this dealt with the NPRM  
5           was written to change the rules for personal computers. And  
6           the industry was very strong in their request that the FCC  
7           undertake stronger enforcement rules because it was felt in  
8           the industry that there were a lot of equipment getting onto  
9           the market that indeed did not meet the requirements.

10           And I think from our perspective, the oversight  
11           that the FCC had given under the certification process of  
12           reviewing documentation did little, if anything, to prevent  
13           those from placing products on the market that indeed did  
14           not meet the rules. It was more of just seeing if I did my  
15           paperwork correctly.

16           And the point was made, "Gee, if you don't have to  
17           do that, you can release funds, personnel, what have you,"  
18           to actually do a little bit stronger job of market  
19           surveillance to kind of prevent more of these pieces of  
20           equipment from getting in the market and blemishing the  
21           record that is out there among the manufacturers who produce  
22           products that indeed do meet their requirements.

23           MR. SCHROEDER: Thank you. John?

24           MR. SHINN: John Shinn, Nortel Networks. I think  
25           one of the best ways to describe enforcement would basically

1 be in the issue of visibility where, you know, you may have  
2 enforcement activity, yet if you're not visible and no one  
3 knows that you're there, you're not going to get any kind of  
4 a reaction. I think the -- interestingly enough, I think  
5 right now you have one of the best -- an example I would  
6 like to use is within your own enforcement staff, Mr.  
7 Hollingsworth, who's very active within the amateur radio  
8 service right now. He's very active. He's very visible.

9           And as a result, you're having a lot of good  
10 responses out of the amateur radio service due to his  
11 activities of enforcement. And I think this is the area  
12 that you're going to need, is visibility of enforcement.  
13 And you have -- the processes are in place, but you need the  
14 visibility and someone needs to know that you're really  
15 going to do something.

16           MR. SCHROEDER: I would fully agree. Paul?

17           MR. HART: Paul Hart, USTA. I think it does a lot  
18 of good when there is a public notice and press coverage on  
19 the fact that you knocked over some guy that's selling 500  
20 watt CB transmitters. I mean, that's the kind of thing that  
21 gets a lot of attention.

22           In this case, the equivalent, wouldn't it be --  
23 would be investigating and taking sanctions against people  
24 who are selling equipment that is not registered, or in  
25 cases where there are willful or I guess you would refer to

1 it as egregious violations of the rules and the requirements  
2 for registration or whatever it is. And that would be to be  
3 active in investigating those complaints. Granted, you  
4 can't commit to do everything anybody comes to you with a  
5 problem, but to be seen as an active pursuer and  
6 investigator and prosecutor of situations where those  
7 conditions are verified.

8 The thing you want to do is to set up the kind of  
9 an incentive sequence that is one that's going to be  
10 productive, both for us and for you. And that is that the  
11 people who do it right, who follow the rules or do a good  
12 job are rewarded for their efforts. And it's shown to them  
13 to be valuable, and that in turn, they have a sales  
14 advantage from that. And that people who operate it the  
15 other way are hurt and stung. And that that is known in  
16 public, and that will I think incent (phonetic) the kind of  
17 behavior that we want to see happen here.

18 MR. SCHROEDER: Thank you, Paul. Bill?

19 MR. HURST: Yes. Bill Hurst with CCL. As you  
20 mentioned, the two different avenues you've considered,  
21 complaint-driven or investigation, as well, one, I believe  
22 complaint-driven needs to be a major issue. That as  
23 complaints come in, that they do get followed up on and  
24 resolved.

25 I don't believe the general trend should be

1 towards investigating. I don't see that we are the Part 68  
2 police that go out there and investigate people to see if  
3 they're complying. But I do believe in the visibility. And  
4 I think it can be some very simple things such as letters  
5 going out to manufacturers saying, "Send me your  
6 documentation to show that you are compliant. Show me the  
7 test report to show that you are compliant." Going into the  
8 marketplace and looking what is out there in the  
9 marketplace, and as you identify equipment and taking a look  
10 at it, I think the visibility -- it's amazing how good we  
11 are when we know that someone is watching. And I think  
12 that's important.

13 MR. SCHROEDER: That's right. A public face on  
14 our investigative actions certainly serves as a deterrent to  
15 noncompliance.

16 Mr. Bipes?

17 MR. BIPES: John Bipes, Mobile Engineering. From  
18 a European point of view, the declaration of conformity as I  
19 understand it has always been a rather serious sort of  
20 declaration. Telecom manufacturers that I have worked with  
21 in Europe have known that along with that declaration, they  
22 are agreeing that if there is a nonconformity, that they  
23 will, for example, advertise in the public media wherever  
24 their product might have been distributed at their cost.

25 If the product is found to be noncompliant, they

1 will not only advertise, but they will buy it back at the  
2 market value. And who knows? There may be some other  
3 additional costs in addition to that.

4 I'm not sure that as we look at the declaration of  
5 conformity from an American point of view, that we are  
6 envisioning anything like that. If we are not, I suspect  
7 that there are some potential flaws in the whole declaration  
8 of conformity issue.

9 MR. SCHROEDER: Thank you. Jim?

10 MR. SALINAS: Jimmy Salinas. In reviewing over  
11 (phonetic) in my corporation, because of the large amount of  
12 products that we buy, we have the same issue. Though we  
13 finally ended up having a set of rules based on my vendors  
14 and suppliers that, "I'll keep a track of complaints of your  
15 technology. Once I get a set of monitor reports against  
16 you, I'll do a review against you. And then, if the review  
17 shows that you willfully did wrong, we destandardize you.  
18 You're no longer available within our corporation. You're  
19 available for review later on, but still you're  
20 destandardized."

21 Until we had the procedure in place, vendors were  
22 coming and going and selling and doing whatever they wanted.  
23 But we had to have a law enforcement procedure set in place,  
24 and we set it in place. In theory, I use the example in my  
25 corporation is if I get three reports on a vendor and I go

1 investigate that vendor.

2 But based on the large amount of reports that you  
3 get and based on the large amount of products, your number  
4 might want to be bigger. You might want to do on a  
5 percentile basis. Report on five percent of this customer's  
6 supplies allows me to go review that customer -- that  
7 vendor's supplies, in that scenario.

8 MR. SCHROEDER: That's an interesting idea. Any  
9 other responses to that? I think we're getting close to  
10 5:00. Are there any other comments or questions anyone  
11 would like to raise before we wrap things up for the day?  
12 Anything else, Bill?

13 Okay. I guess that'll be it for this afternoon.  
14 We'll hope to see you all here tomorrow morning at 9:00.  
15 Thank you very much for coming.

16 (Whereupon, at 5:00 p.m., the hearing recessed, to  
17 reconvene the following day, Tuesday, July 13, 1999, at 9:00  
18 a.m.)

19 //

20 //

21 //

22 //

23 //

24 //

25 //

**REPORTER'S CERTIFICATE**

FCC DOCKET NO.: N/A  
CASE TITLE: PUBLIC FORA ON DEREGULATION  
HEARING DATE: July 12, 1999  
LOCATION: Washington, D.C.

I hereby certify that the proceedings and evidence are contained fully and accurately on the tapes and notes reported by me at the hearing in the above case before the Federal Communications Commission.

Date: 7/12/99 Sharon Cook  
Official Reporter  
Heritage Reporting Corporation  
1220 "L" Street, N.W.  
Washington, D.C. 20005

**TRANSCRIBER'S CERTIFICATE**

I hereby certify that the proceedings and evidence were fully and accurately transcribed from the tapes and notes provided by the above named reporter in the above case before the Federal Communications Commission.

Date: 7/20/99 Angie McKinney  
Official Transcriber  
Heritage Reporting Corporation

**PROOFREADER'S CERTIFICATE**

I hereby certify that the transcript of the proceedings and evidence in the above referenced case that was held before the Federal Communications Commission was proofread on the date specified below.

Date: 7/22/99 George E. McLaughlin, Jr.  
Official Proofreader  
Heritage Reporting Corporation