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

In the Matters of)
)
 AMERITECH CORPORATION TELEPHONE)
 OPERATING COMPANIES' CONTINUING)
 PROPERTY RECORDS AUDIT)
)
 BELL ATLANTIC (NORTH) TELEPHONE)
 COMPANIES' CONTINUING PROPERTY)
 RECORDS AUDIT)
)
 BELL ATLANTIC (SOUTH) TELEPHONE)
 COMPANIES' CONTINUING PROPERTY)
 RECORDS AUDIT)
)
 PACIFIC BELL AND NEVADA BELL)
 TELEPHONE COMPANIES' CONTINUING)
 PROPERTY RECORDS AUDIT)
)
 SOUTHWESTERN BELL TELEPHONE)
 COMPANY'S CONTINUING PROPERTY)
 RECORDS AUDIT)
)
 U S WEST TELEPHONE COMPANIES')
 CONTINUING PROPERTY RECORDS AUDIT)
)
 In the Matter of)
)
 MCI WORLDCOM, INC.)
)
 On Request for Inspection of Records)

CC Docket No. 99-117
ASD File No. 99-22

FOIA Control No. 99-163

MEMORANDUM OPINION AND ORDER

Adopted: December 1, 1999;

Released: December 6, 1999

By the Commission:

1. The Commission has under consideration applications for review filed by Ameritech Communications, Inc. (Ameritech), BellSouth Corporation (BellSouth), Southwestern

Bell Telephone Company, Pacific Bell, and Nevada Bell (jointly, SBC), and U S WEST Communications, Inc. (U S West) (jointly referred to as the applicants).¹ The applicants seek review of the decision of the Common Carrier Bureau (Bureau) to make available pursuant to a protective order materials related to the Bureau's audits of the Regional Bell Operating Companies' (RBOCs) Continuing Property Records (CPR), in response to a Freedom of Information Act (FOIA) request by MCI WorldCom, Inc. (MCIW).² For the reasons discussed below, we affirm the Bureau's decision to release the materials subject to a protective order.

Background

2. The Bureau's Accounting Safeguards Division (ASD) conducted audits of the RBOCs hard-wired central office equipment (COE) to determine whether the carriers' records are in compliance with Part 32 of Commission's rules.³ The CPR audits included field audits in which Commission auditors, together with representatives of the companies, inspected company premises to verify the physical existence of specific items of equipment. Items were classified or "scored" as (1) found; (2) found in another location; (3) not found/missing; or (4) unverifiable.⁴ Upon completion of the field audits, the ASD auditors asked the RBOCs for source documents to prove the physical existence of items not found and for items the companies recorded as "undetailed." As the RBOCs provided documents, the auditors reviewed the information and determined whether the evidence submitted was sufficient to warrant a change in the scoring.⁵

¹ Ameritech's Application for Review of the CCB's Action Granting MCI WorldCom's FOIA Request (Aug. 3, 1999) (Ameritech App. For Rev.); Letter from M. Robert Sutherland, General Attorney, BellSouth, to Christopher J. Wright, General Counsel (Aug. 3, 1999) (BellSouth App. for Rev.); SBC Application for Review (SBC App. for Rev.) and letter from B. Jeannie Fry, Director -- Federal Regulatory, SBC, to Christopher J. Wright, General Counsel (Aug. 3, 1999) (Fry Letter); U S WEST Application for Review and Review of Freedom of Information Action (Aug. 3, 1999) (U S West App. for Rev.).

² Letter from Lisa Zaina, Acting Deputy Chief, Common Carrier Bureau, to Mary Brown, Senior Policy Counsel, MCI WorldCom, Inc. (July 27, 1999) (Bureau Decision).

³ See 47 C.F.R. §§ 32.000(e) and (f). In Part 32 of its rules, the Commission prescribes a Uniform System of Accounts for telecommunications carriers. Specifically, Part 32 requires companies to maintain CPRs and supplemental records that include: (1) a description of the property; (2) the specific location of the property; (3) the identification of the work under which the unit was installed; (4) the year of installation of the property; and (5) any other information necessary to determine the original cost of the property. The rules require that the property be described in sufficient detail that it may be spot checked for physical verification of its existence.

⁴ See The Accounting Safeguards Division Releases Information Concerning Audit Procedures For Considering Requests By The Regional Bell Operating Companies To Reclassify Or "Rescore" Field Audit Findings Of Their Continuing Property Records, Public Notice, 14 FCC Rcd 6243 (1999).

⁵ Ameritech requested that its submission be kept confidential consistent with section 220(f) of the Act, and not be disclosed publicly pursuant to sections 0.457(d) and 0.459 of the Commission's rules. See Letter from Robin Gleason, Director, Regulatory Finance, Ameritech, to Kenneth M. Ackerman, Chief, Audits Branch (May 1, 1997). SBC marked its submissions "proprietary." BellSouth noted that it did not make a confidentiality request under 47 C.F.R. § 0.459 (letter from M. Robert Sutherland, General Attorney, BellSouth, to Andrew S. Fishel, Managing

The auditors also provided each RBOC with copies of their respective audit reports for comment. In their comments, the RBOCs disputed the auditors' conclusions and questioned the validity of the audit procedures.

3. The RBOCs subsequently waived their claims of confidentiality for information in the audit reports and the companies' comments, and the Commission publicly released these materials.⁶ In the audit reports, the ASD auditors noted that approximately 11 percent of the equipment could not be found, and approximately 14 percent was unverifiable or found in another location. The audit reports also noted that certain carrier records contained deficiencies and did not comply with the Commission's rules. The Commission also initiated a Notice of Inquiry (NOI) proceeding seeking comments on issues arising from the CPR audit reports.⁷ Most pertinent to this proceeding, the NOI sought public comment on "[t]he validity and reasonableness of the methodology used by the Bureau's auditors in determining whether to rescore or to modify a finding during the field audit that equipment was 'not found'."⁸

4. After the issuance of the NOI, MCIW filed a FOIA request seeking general public release of "any materials that the RBOCs have submitted to the [ASD] to explain why hard-wired COE equipment [sic] items were not found by the auditors or to support claims that items in the audit sample should be 'rescored.'"⁹ MCIW also sought "any audit workpapers generated by ASD staff during the course of the audits that show or support the item-by-item scoring of the items in the audit sample."¹⁰ Finally, MCIW sought CPR detail for any items scored "partially

Director (July 12, 1999)), but it marked its submissions "private/proprietary." U S West noted that the information submitted should "receive the normal protection afforded by the Audits Branch to information collected during the audit process." Letters from C. Michael Crumling, Executive Director – Federal Regulatory, U S West, to Kenneth M. Ackerman, Chief, Audits Branch (April 30, 1997, July 16, 1997, March 31, 1998) (Crumling Letters).

⁶ Ameritech Corporation Telephone Operating Companies' Continuing Property Records Audit, 14 FCC Rcd 4273 (1999); BellSouth Telecommunications' Continuing Property Records Audit, 14 FCC Rcd 4258 (1999); Bell Atlantic (South) Telephone Companies' Continuing Property Records Audit, 14 FCC Rcd 5541 (1999); Bell Atlantic (North) Telephone Companies' Continuing Property Records Audit, Order, ASD File No. 99-22 (Mar. 12, 1999); Pacific Bell and Nevada Bell Telephone Companies' Continuing Property Records Audit, 14 FCC Rcd 5839 (1999); U S West Telephone Operating Companies' Continuing Property Record Audits, Order, ASD File No. 99-22 (Mar. 12, 1999); Southwestern Bell Telephone Company's Continuing Property Records Audit, 14 FCC Rcd 4242 (1999).

⁷ See In the Matters of Ameritech Corporation Operating Companies' Continuing Property Records Audit, et al., Notice of Inquiry, 14 FCC Rcd 7019 (1999).

⁸ Id. at 3.

⁹ Letter to Andrew S. Fishel, Managing Director, from Mary L. Brown, MCI Telecommunications Corporation (June 22, 1999) (MCIW FOIA Request) at 1.

¹⁰ Id. at 2. Specifically, MCIW sought the letters sent by ASD auditors to the RBOCs providing the results of the physical inspection, and audit workpapers showing item-by-item scoring underlying these letters or the draft audit reports.

found," "not found," or "not verifiable" at any time during the audit process.¹¹ MCIW asserted that this information was necessary to respond to the questions posed in the NOI, especially Issue No. 2.¹² It stated that if the Commission determined that unrestricted public release was not possible, the public should be allowed to review the material under a protective order.¹³ The RBOCs opposed MCI's FOIA request.¹⁴

5. The Bureau granted MCIW's FOIA request subject to a protective order.¹⁵ The Bureau determined that, while certain of the materials filed by the RBOCs during the course of the audits contained confidential commercial information that presumably was exempt from mandatory disclosure under the FOIA, it would, in its discretion, authorize release of the materials to parties to the NOI who agreed to sign a protective order.¹⁶ The Bureau explained that the discretionary release was warranted because access to the materials was required in order to comment on Issue No. 2 of the NOI.¹⁷ The Bureau also explained that by allowing the release through a protective order, any potential competitive harm to the RBOCs from release the information would be "reasonably ameliorated."¹⁸

6. All of the RBOCs, with the exception of Bell Atlantic,¹⁹ sought Commission review of the Bureau Decision. MCIW opposed the applications for review,²⁰ and U S West replied to MCIW.²¹

¹¹ Id. at 2.

¹² Id. at 2-4.

¹³ Id. at 4.

¹⁴ Letter from Leander R. Valent, Vice President & General Counsel, Ameritech, to Andrew S. Fishel, Managing Director (July 12, 1999); Letter from M. Robert Sutherland, General Attorney, BellSouth, to Andrew S. Fishel, Managing Director (July 12, 1999); Letter from James T. Hannon, Senior Attorney, U S West, to Andrew S. Fishel, Managing Director (July 12, 1999); Letter from Jonathan W. Ryosan, Senior Counsel, SBC, to Andrew S. Fishel, Managing Director (July 9, 1999).

¹⁵ Bureau Decision, supra.

¹⁶ Id. at 5.

¹⁷ Id. at 4.

¹⁸ Id. at 2.

¹⁹ Bell Atlantic filed a FOIA request for various internal Commission documents that concerned the ASD audit of Bell Atlantic's own equipment. Letter from G.R. Evans, Vice President, Federal Regulatory Matters, Bell Atlantic to Andrew S. Fishel, Managing Director (July 7, 1999) (FOIA Control No. 99-177). The Bureau denied Bell Atlantic's request. Letter from Lisa M. Zaina, Acting Deputy Chief, CCB, to G.R. Evans, Vice President, Federal Regulatory Matters, Bell Atlantic (Aug. 12, 1999). Bell Atlantic has sought review of the Bureau's decision. Letter from Edward Shakin, Regulatory Counsel, Bell Atlantic, to Christopher J. Wright, General Counsel (Aug. 26,

Decision

7. Upon consideration of the applicants' arguments, and for the reasons stated below, we affirm the Bureau's decision to make specified CPR audit materials available to the public pursuant to a protective order. However, as indicated below, we modify the terms and conditions of the release in response to requests made by the carriers.

8. The carriers generally contend that disclosure of these materials is unlawful, will result in competitive harm, and is unnecessary in order to afford meaningful comment on the issues in the NOI. We disagree. As to the claim that disclosure is unlawful, section 220(f) of the Communications Act prohibits employees from disclosing information obtained during the course of an audit "except as [the employee] may be directed by the Commission or by a court." Contrary to the contention of several of the applicants,²² the Bureau properly observed (Bureau Decision at 3) that section 220(f) constitutes explicit authority to disclose audit-related materials as a matter of the Commission's discretion.²³ See Examination of Current Policy Concerning the Treatment of Confidential Information Submitted to the Commission, 13 FCC Rcd 24816, 24820-21 (1998) (Treatment of Confidential Information), recon. denied, FCC 99-262 (rel. Oct. 5, 1999); Amendment of Part 0 of the Commission's Rules with Respect to Delegation of Authority to the Chief, Common Carrier Bureau, 104 F.C.C.2d 733, 737 (1986) (CCB Delegation). Because disclosure is authorized, the Trade Secrets Act,²⁴ which prohibits the release of trade secrets and confidential information unless authorized by law, does not bar the release of the audit materials, as some applicants assert.²⁵ Treatment of Confidential Information at 24820-21; CCB Delegation at 737. Although some applicants argue that section 220(f) was merely intended as a prohibition on disclosures by Commission employees, the section's

1999).

²⁰ MCI WorldCom Opposition to the Applications for Review (Aug. 17, 1999).

²¹ Reply of U S West to MCI's Opposition (Aug. 27, 1999). U S West sought leave to file this reply, see Motion by U S West for Leave to File Reply to MCI's Opposition (Aug. 27, 1999), but leave is not necessary. See 47 C.F.R. § 1.115(d).

²² Ameritech App. for Rev. at 3-4, 7; SBC App. for Rev. at 7.

²³ Section 4(j) of the Communications Act, as amended, 47 U.S.C. § 154(j), and the Commission's implementing rules, 47 C.F.R. §§ 0.457(d)(1) and (d)(2), also authorize us, as a matter of discretion, to release the confidential commercial information. See *v FCC. Schreiber*, 381 U.S. 279, 291-92 (1965) ("Grants of agency authority comparable in scope to § 4(j) have been held to authorize public disclosure of information . . . as the agency may determine to be proper upon a balancing of the public and private interests involved."). See Treatment of Confidential Information at 24820.

²⁴ 18 U.S.C. § 1905.

²⁵ Ameritech App. for Rev. at 7; SBC App. for Rev. at 7; U S West App. for Rev. at 6.

language also creates an explicit exception to the prohibition for disclosures that are directed by the Commission. The Commission has consistently interpreted section 220(f) as permitting such discretionary disclosures, and the applicants have not persuaded us that our longstanding interpretation is in error. Indeed, given the importance of Commission audits to the effective performance of the Commission's statutory responsibilities with respect to carriers, we believe the Act's statutory scheme fully envisions that, in some cases, disclosures of carrier-supplied audit information might become necessary in the course of carrying out the Commission's enforcement and regulatory policymaking functions.

9. We also agree with the Bureau and MCIW that in these circumstances the public interest outweighs any potential harm to the RBOCs. Release of the materials specified by MCIW will enable the public to comment on NOI Issue No. 2 to an extent that is otherwise not possible, and, most importantly, with respect to issues raised by the RBOCs that rescoring was done incorrectly. Several of the applicants claim that MCIW and other interested parties do not need access to the audit workpapers or related audit submissions to comment on Issue No. 2 because the previously disclosed audit reports and the Scoring Public Notice contain sufficient information to allow parties to comment.²⁶ The scope of the inquiry envisioned by Issue No. 2 is not so narrow as that posited by the applicants, however. Public information released to date merely summarizes the auditors' general procedures. Comment on Issue No. 2 would not elicit useful information about the accuracy and validity of the audits unless commenters were allowed to examine how those general procedures were actually implemented when the auditors decided whether rescoring was appropriate. Therefore, we agree with the Bureau that the workpapers and underlying submissions by the RBOCs are necessary to evaluate "the validity and reasonableness of the methodology" as provided for in Issue No. 2 of the NOI.²⁷

10. We recognize, as the applicants note, that in many instances in the past we have declined to release audit materials publicly.²⁸ The disclosures here are not public, however. Moreover, in none of the cases cited had we embarked on the type of public inquiry we have instituted in the NOI. It is fully consistent with Commission precedent to disclose confidential information, using protective orders, to enable participation in Commission proceedings.²⁹ We have therefore followed that policy here.

²⁶ Ameritech App. for Rev. at 4-5; SBC App. for Rev. at 4; BellSouth App. for Rev. at 3.

²⁷ See MCI Opp. at 5.

²⁸ SBC App. for Rev. at 5-6; U S West App. for Rev. at 11; Ameritech App. for Rev. at 8-9; BellSouth App. for Rev. at 6-7, all citing cases such as J. David Stoner, 5 FCC Rcd 6458, 6460-61 (1990); Martha H. Platt, 5 FCC Rcd 5742, 5743 (1990); Scott J. Rafferty, 5 FCC Rcd 4138 (1990); Western Union Tel. Co., 2 FCC Rcd 4485 (1987); GTE Tel. Operating Cos., 9 FCC Rcd 2588 (1994).

²⁹ See Treatment of Confidential Information at 24844 & nn. 146-47 citing, e.g., Abbott Laboratories v. Young, 691 F. Supp. 462, 467 (D.D.C. 1988) (disclosure to ensure interested parties have meaningful opportunity to participate in rulemaking), remanded on other grounds, 920 F.2d 984 (D.C. Cir. 1990), cert. denied, 502 U.S. 819

11. Nor do we perceive the disclosure here as establishing a precedent that compromises the integrity of the audit process. The NOI proceeding that prompted the disclosures is unusual: the Commission has rarely, if ever, sought public comment on its auditors' methodology and findings. Here, however, we were sufficiently concerned about the issues surrounding the audits to invite public comment, and we believe that broader comment will greatly assist us in resolving the issues. Hence, the Bureau's decision does not mark a departure from our general policies concerning the confidentiality of audit materials; rather, it is an exception to those policies that is warranted by unusual circumstances.

12. As to the potential harm to the carriers, the protective order adopted by the Bureau was crafted to ensure that the potential for competitive harm, if any at all, is minimal. Only information related to the sampled items not found, unidentified or found in another location will be disclosed, and then can only be used to file comments in the NOI proceeding. In addition, no party can copy these materials. We also remind the parties of the severe penalties for violation of the protective order.³⁰

13. The applicants indicate that they would prefer a more stringent protective order.³¹ We agree with certain of their proposals in this regard. We will grant the request that access to the materials be limited to persons without decision making authority or influence regarding competitive issues.³² We also agree with SBC and BellSouth that vendor-specific pricing information found in the audit materials should be redacted.³³ Redaction of this information will not compromise the ability of the public to respond to Issue No. 2 of the NOI.³⁴ Where invoices were supplied, the entire invoice may be redacted, but a notation should be inserted indicating that an invoice was provided. We recognize that there may be instances where cost is relevant to the Bureau's scoring of an item.³⁵ MCIW already has access to this type of information from

(1991); Petition of Public Utilities Commission, State of Hawaii, 10 FCC Rcd 2881, 2884 and nn. 37-38 (1995). See also MCI Telecommunications Corp., 58 R.R.2d 187, 190 (1985) (third-party agreements held confidential but made available subject to a protective order for use in an ongoing investigation).

³⁰ Treatment of Confidential Information at 24835 and n.96.

³¹ See Ameritech App. for Rev. at 7; U S West App. for Rev. at 14 n.5; SBC App. for Rev. at 7-8.

³² See Treatment of Confidential Information at 24834.

³³ SBC App. for Rev. at 9-10; BellSouth App. for Rev. at 7. See also Letter from Judith St. Ledger-Roty, Kelley, Drye & Warren LLP (attorney for Fujitsu Network Communications, Inc.) to Lisa M. Zaina, Acting Deputy Chief, CCB (Sept. 10, 1998 [sic]) (seeking protection of vendor specific pricing information under the protective order).

³⁴ See, e.g., Audit of the Continuing Property Records of Southwestern Bell Telephone Company as of June 30, 1997 (CCB/ASD Dec. 22, 1998) at 11-12 ("For the purpose of this report, we assume the original costs recorded on [the carrier's] CPR are correct. At some later date, we will investigate these costs and determine their validity.").

³⁵ See MCIW Reply at 6 n.13.

Bell Atlantic's documents, *see* paragraph 6, *supra*, which should provide it sufficient information to comment on the Bureau's methodology insofar as costs may be relevant to scoring. The extent to which cost issues were relevant varied considerably, depending on the carrier involved, but was most relevant in the case of the Bell Atlantic (North) audit. We do not think public comment on costs for the other carriers is critical to our consideration of this issue in the NOI.

14. Similarly, Ameritech and SBC object to the disclosure of materials concerning undetailed investment.³⁶ MCIW's FOIA request did not include a request for these materials,³⁷ and we conclude that access to these materials should not be required.³⁸ The Bureau will also ensure that only materials related to Issue No. 2 will be made available under the protective order, thus alleviating Ameritech's concerns.³⁹ For this purpose, as well as to ensure that no vendor pricing information is disclosed, we will permit the carriers to review and suggest redactions of our workpapers and the carriers' responses, as Ameritech and SBC request.⁴⁰ However, the ultimate decision as to whether specific materials should be redacted in accordance with our decision here is to be made by the Bureau.⁴¹

15. We will provide the carriers with ten (10) working days from the release date of this decision (*see* paragraph 17, *infra*) to perform the review and redaction we authorize in this decision.⁴² Carrier review shall take place at the Commission. Commission staff will be present to assist the carriers. Each carrier should review only the workpapers and carriers submissions relevant to that carrier, unless, of course, the carriers agree to some other method of carrying out the review. The Bureau will, within ten (10) working days of the submission of the redacted materials, determine whether the proposed redactions are within the scope of this decision. The redacted version will be provided to MCIW when the Bureau receives it, unless a carrier has sought a stay of our decision here, *see* paragraph 17, *infra*. To the extent the Bureau determines that any carrier-redacted materials should be disclosed, such materials will be provided only after

³⁶ Ameritech App. for Rev. at 7; SBC App. for Rev. at 7.

³⁷ *See* MCIW FOIA Request, *supra* n.9.

³⁸ Our request for public comment on methodology in Issue No. 2 did not encompass the different issues surrounding undetailed investment. *See* NOI at 3 (Issue No. 5).

³⁹ Ameritech App. for Rev. at 7 n.20.

⁴⁰ Ameritech App. for Rev. at 7; SBC App. for Rev. at 8-9.

⁴¹ The carriers may, of course, seek Commission review of the Bureau's decisions.

⁴² SBC suggested ten days to review the workpapers and 60 days to redact vendor specific information. *See* Fry Letter at 1; SBC App. for Rev. at 9 n.19 and 10 n.23. Ameritech's suggestion that "a minimum of 90 days" is required (Ameritech App. for Rev. at 7) is rejected as too lengthy a period of time, as is SBC's request for a 60 day review period.

the carriers have had an opportunity to seek Commission review of the Bureau's decision in accordance with section 0.461(i) of our rules, 47 C.F.R. § 0.461(i). We expect, however, that the carriers will propose redactions only in good faith compliance with this decision. The Bureau is also directed to modify the protective order consistent with this decision for further use in this proceeding.

16. Finally, Ameritech and U S West, relying on FOIA Exemption 5, 5 U.S.C. § 552(b)(5), argue that the Bureau's release of the audit workpapers is neither "compelled nor warranted," and further that the Bureau provided no sound reasoning for its departure from precedent in choosing to disclose the workpapers.⁴³ The decision to release or withhold Exemption 5 materials is within the discretion of the Commission, and, as indicated above, we believe that disclosure is warranted in the unusual circumstances of this case.⁴⁴

Conclusion and Ordering Clauses

17. For the reasons stated above, the materials sought by MCIW will be released under a protective order, as modified in this decision, pursuant to section 220(f). The Bureau will notify applicants by telephone of this decision and the time for seeking a stay. They will be afforded ten (10) working days from the release date of this decision to seek a stay. See 47 C.F.R. § 0.461(i)(4).⁴⁵

18. Accordingly, IT IS ORDERED that the applications for review by Ameritech Communications, Inc., BellSouth Corporation, Southwestern Bell Telephone Company, Pacific

⁴³ Ameritech App. for Rev. at 6-7; U S West App. for Rev. at 11 n.4.

⁴⁴ We deny U S West's request that if we affirm the Bureau's decision to disclose its materials, we instead should return its three volumes of confidential data. U S West App. for Rev. at 14-15 n.6, citing 47 C.F.R. § 0.459(e). Section 0.459(e) applies only to voluntarily submitted materials. As U S West acknowledged when it submitted these materials to the Bureau, it was responding to data requests pursuant to 47 U.S.C. §§ 218 and 220(c) and 47 C.F.R. § 0.291. See Crumling Letters, supra n.5. Moreover, our rules provide that "no materials submitted with a request for confidentiality will be returned if a request for inspection is filed under § 0.461." 47 C.F.R. § 0.459(e). See also Treatment of Confidential Information at 24829-30.

⁴⁵ The action of any one RBOC seeking a stay of our decision will stay the release of the materials only for that RBOC. We note that the Bureau erroneously relied on 47 C.F.R. § 0.459(g) in providing the carriers five days to seek Commission review of the its decision. Bureau Decision at 5. Instead, it should have given the RBOCs 10 days to seek review of its decision pursuant to 47 C.F.R. § 0.461(i)(1).

19. Bell, and Nevada Bell, and U S West Communications, Inc. ARE GRANTED IN PART AND DENIED IN PART.

20. The Officials responsible for this action are the following Commissioners: Chairman Kennard, Commissioners Ness, Furchtgott-Roth, Powell and Tristani.

FEDERAL COMMUNICATIONS COMMISSION



Magalie Roman Salas
Secretary