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

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In the Matter of	)	
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	

PETITION FOR CLARIFICATION OF MCI WORLDCOM

Of Counsel:

Richard S. Whitt
Cristin L. Flynn
MCI WorldCom, Inc.
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006
(202) 887-3845

February 9, 2000

EXECUTIVE SUMMARY

MCI WorldCom seeks clarification of the Line Sharing Order as to the operational parameters for deploying line sharing. In MCI WorldCom's view, the Line Sharing Order can and should be read to allow CLECs to provide voice and data services via such a configuration; simply stated, to permit CLEC line sharing. Consistent with this requirement, the ILECs must carry out certain discrete functions, including making necessary cross-connections and performing trouble reporting and troubleshooting functions between (1) the loop leased by the CLEC from the ILEC and (2) collocated CLEC advanced services equipment, to allow the actual operation of this configuration. In the absence of explicit Commission direction, however, at least one ILEC has indicated (in industry discussions) that it might refuse to allow CLEC line sharing. Accordingly, clarification, or possibly reconsideration, is required with respect to that discrete aspect of the Line Sharing Order.

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PETITION FOR CLARIFICATION OF MCI WORLDCOM

MCI WORLDCOM, Inc. ("MCI WorldCom"), by its attorneys, hereby files this petition for clarification of the Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in CC Docket No. 96-98 ("Line Sharing Order"),[1] issued by the Commission on December 9, 1999, in the above-captioned proceedings. MCI WorldCom urges the Commission to clarify that an incumbent local exchange carrier ("ILEC") must undertake those tasks necessary to support the provision of line sharing where a competitive local exchange carrier ("CLEC") provides voice service via a so-called UNE platform, and seeks -- via its own advanced services equipment or that of a second CLEC -- to provide DSL-based data services over the same copper loop.

[1] In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in CC Docket No. 96-98, CC Docket Nos. 98-147, 96-98, FCC 99-355 (released December 9, 1999) ("Line Sharing Order").

I. INTRODUCTION AND BACKGROUND

MCI WorldCom is a leading global telecommunications and information services company. Through its wholly-owned subsidiaries, MCI WorldCom provides its business and residential customers with a full range of local, long distance, and international telecommunications and information services.

In response to the Further Public Notice issued by the Commission in this proceeding, MCI WorldCom filed comments strongly supporting the treatment of the high frequency path of local loops as an unbundled network element available through line sharing.[2] MCI WorldCom stressed that because not all CLECs seek to offer both voice and data services to consumers, line sharing will greatly facilitate competitive options; this would be especially true where MCI WorldCom was interested in "providing voice services on a copper loop with another competitive LEC's data service, or provide data service along with an incumbent LEC's voice service... [or] resell a competitive LEC's data services with the incumbent LEC's voice services."[3] MCI WorldCom urged the Commission to adopt federal line sharing requirements that promote robust advanced services competition, especially to the benefit of residential consumers.

On December 9, 1999, the FCC adopted its Line Sharing Order in this proceeding. Consistent with the views advanced by MCI WorldCom and other competitive carriers, the Commission concludes therein that the high frequency portion of a copper loop meets the statutory definition of a

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[2] Comments of MCI WorldCom, Inc., CC Docket No. 98-147, filed June 15, 1999, at 10-13 ("MCI WorldCom Comments"); Reply Comments of MCI WorldCom, Inc., CC Docket No. 98-147, filed July 22, 1999, at 9-20 ("MCI WorldCom Reply Comments").

[3] MCI WorldCom Comments at 10-11.

network element, and that ILECs must unbundle that element pursuant to Sections 251(d)(2) and (c)(3) of the Telecommunications Act of 1996 ("1996 Act").[4] A requesting carrier is entitled, at its option, either to (1) access the solely non-voiceband transmission frequencies, separate from other loop functions, or (2) exclusive use of the entire unbundled loop facility.[5] The Commission finds specifically that a failure to provide as an unbundled element the high frequency spectrum of a local loop "would materially raise competitive LECs' cost of providing xDSL-based service to residential and small business users, delaying broad facilities-based market entry, and materially limiting the scope and quality of competitors' service offerings."[6] The Commission further determines that, "[b]ecause some residential and small business markets may lack the economic characteristics that would support competitive entry in the absence of access to the high frequency spectrum of a local loop, it is clear that spectrum unbundling is crucial for the deployment of broadband services to the mass consumer market."[7]

MCI WorldCom seeks clarification as to the operational parameters for deploying line sharing. In particular, clarification is necessary where a CLEC seeks to use the UNE platform, together with its own DSL facilities or those of a second CLEC, to provide service to a residential or small business customer. In MCI WorldCom's view, the Line Sharing Order can and should be read to allow CLECs to provide voice and data services via such a configuration; simply stated, to permit two CLECs to line share (CLEC line sharing). Consistent with this requirement, the ILECs will be required to carry out certain discrete functions, including making necessary cross-connections and performing

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4 Line Sharing Order at para. 25.

5 Id. at para. 18.

6 Id. at para. 25.

7 Id.

troubleshooting functions between (1) the loop leased by the CLEC from the ILEC and (2) CLEC equipment located in the central office, to allow the actual operation of this configuration. In the absence of explicit Commission direction, however, at least one ILEC has indicated (in industry discussions) that it might refuse to allow CLECs to share loops in this manner. Accordingly, MCI WorldCom requests expedient clarification of this aspect of the Line Sharing Order.

II. THE COMMISSION SHOULD CLARIFY THAT ILECS MUST TAKE ALL NECESSARY STEPS TO ALLOW UNE-P CLECS TO SELF-PROVISION OR PARTNER WITH FACILITIES-BASED DATA CLECS TO PROVIDE VOICE AND DATA SERVICE TO THE SAME CUSTOMER

MCI WorldCom believes that the Commission intended to permit CLECs to provide jointly voice and data services over the same loop to residential and small business customers. Consistent with this understanding, MCI WorldCom requests that the Commission clarify this narrow, but all-important, aspect of its decision.

A. The Commission Should Clarify That The Line Sharing Order Allows CLECs To Provide A Combined UNE-P Voice And DSL Data Service To Residential And Small Business Customers

The Line Sharing Order resolves several specific operational issues associated with the implementation of line sharing. The Commission explains, for instance, that CLECs seeking to provide both voice and data services to the same customer "could obtain combinations of network elements and use those elements to provide circuit-switched voice services as well [as] data services."[8] In this scenario, the Commission explains, "a requesting carrier essentially would share the line with itself. . . ."[9] Further, the Commission "would support" cooperation between carriers whereby CLECs

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[8] Line Sharing Order at para. 47.

[9] Id. at para. 47 n.95.

providing analog voice services seek to partner with CLECs "offering data services to share unbundled loops obtained from incumbent LECs. . . ."[10] Moreover, the Commission also notes, "if the customer switches its voice provider from the incumbent LEC to a competitive LEC that provides voice services, the xDSL-providing competitive LEC may enter into a voluntary line sharing agreement with the voice-providing competitive LEC."[11] Thus, it appears that the Commission intended to permit CLEC-to-CLEC line sharing when the ILEC is not the voice provider to residential and small business customers.

Despite the relatively clear language of the Line Sharing Order, however, and given that the primary focus of the decision was on line sharing with an ILEC, some of the language, taken out of context, has been interpreted by at least one ILEC to support the view that CLECs cannot line share with each other.[12] For example, the decision at one point indicates that "line sharing contemplates that the incumbent LEC continues to provide POTS services on the lower frequencies while another carrier provides data services on higher frequencies."[13] The rule adopted to implement this view states that an ILEC need only provide access to the high frequency portion of the loop if the ILEC "is providing, and continues to provide, analog circuit-switched voiceband services on the particular loop...."[14] However, this rule appears only to contemplate that ILECs should not be compelled to line share the high frequency portion of the loop if a CLEC is already the voice provider - because the

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[10] Id. at para. 53.

[11] Id. at para. 73, n.163.

[12] This is not simply an academic issue; industry discussions with at least one ILEC have indicated that it may not permit UNE-P CLEC line sharing or the ability to provide data over the UNE-P loop.

[13] Line Sharing Order at para. 72.

[14] 47 C.F.R. Section 51.319(h)(3).

ILEC, in essence, has nothing to share. If that is the case, then the Line Sharing Order should be clarified to reflect that the Commission did not intend to limit an ILEC's obligation to facilitate line sharing among CLECs.

1. The ILECs Should Provide CLECs With The Same Functions They Already Perform In Support Of ILEC Line Sharing

MCI WorldCom asks the Commission to clarify that, where two CLECs seek to share a loop to provide voice and data services to the same customer, the ILEC must perform all necessary supporting functions to facilitate this network configuration. These support functions, while not at all burdensome to the ILEC, are absolutely critical in order for CLEC line sharing to succeed. First and foremost, the ILEC must connect the loop to a splitter to separate the voice and data signals. The separate voice signal is then cross-connected either to the voice CLEC's equipment, or to the ILEC's switch if the voice CLEC is buying the UNE-platform. The data signal is cross-connected to the data CLEC's equipment. In most instances, this will entail ILEC personnel establishing and maintaining several cross-connections at the Main Distribution Frame (MDF). The cross-connection of wiring at the MDF is a relatively simple procedure, one which the ILECs perform on a daily basis when establishing or modifying loop connections for customers.[15] In addition, ILECs necessarily will perform the same functions when they offer voice and data services, and their advanced services affiliates offer data services.[16] The ILECs also must continue to provide to CLECs the same Operations Support Systems (OSS), trouble-reporting, and troubleshooting functions that the ILEC otherwise would perform if the CLEC leased the entire local loop from the ILEC. Indeed, for

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[15] Line Sharing Order at para. 145.

[16] Id.

purposes of these support functions, there is no fundamental difference under the 1996 Act between a CLEC's leasing of a UNE loop and its leasing of a UNE platform. Any attempt by the ILECs to create such a distinction is unreasonably discriminatory, and would materially impair CLECs' abilities to provide services over those facilities.[17] Of course, consistent with the Line Sharing Order, CLECs will pay TELRIC-based rates for those ILEC functions necessary to allow the provision of combined voice/data services.[18]

This set of non-discriminatory support requirements is fully compatible with the technical and legal obligations under which the ILECs already perform these types of functions on behalf of CLECs. Over three years ago, the Commission found, and the Supreme Court later upheld, that incumbents must provide and combine any and all network elements for new entrants, without artificial restrictions.[19] In particular, the Commission's rules require the ILECs to, among other things, "perform the functions necessary to combine requested elements in any technically feasible manner either with other elements from the incumbent's network, or with elements possessed by new entrants...."[20] Further, in the Line Sharing Order, the FCC acknowledges that cross-connections are necessary to connect CLEC equipment to ILEC facilities, and allows the ILECs to recover from CLECs the TELRIC-based costs for performing such a task.[21] Together, these rulings allow CLECs to request, and require ILECs to provision, the functions necessary to combine CLEC facilities and ILEC UNEs.

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17 For a more detailed discussion of these points, see Appendix A.
18 Line Sharing Order at para. 145.
19 Local Competition Order at para. 292.
20 Id. at para. 293.
21 Line Sharing Order at para. 145.

2. CLEC Line Sharing Will Help Foster Significant Competitive Entry Into Residential And Small Business Markets

In light of certain restrictions placed on the availability of UNEs, CLECs' ability to share lines becomes all the more important to penetrating the residential and small business markets. In particular, the UNE Remand Order, prevents CLECs (except in limited circumstances) from serving residential and small business consumers by assembling either (1) a standalone, DSL-based broadband UNE platform, or (2) a combined circuit-switched voice/packet-switched data UNE platform.[22] Thus, CLECs seeking to serve residential and small business markets will be able to assemble a platform of unbundled network elements only into a circuit-switched, voice-only configuration.[23]

With two important competitive entry options now foreclosed, national CLECs such as MCI WorldCom are faced with a stark conundrum. The desire to serve millions of residential and small business consumers with a full panoply of voice and broadband data services and capabilities runs headlong into the fact that, in the Commission's own words, "competitors are impaired in their ability to offer advanced services without access to incumbent LEC facilities."[24]

As the Commission is aware, MCI WorldCom has begun to compete in the local residential marketplace in New York State via the UNE platform. By the end of 1999, MCI WorldCom had provisioned platform-based local service to over 200,000 New York residential customers. MCI

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[22] In the Matter of the Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Docket No. 96-98, FCC 99-238, released November 5, 1999 ("UNE Remand Order")

[23] This aspect of the UNE Remand Order will be one subject, inter alia, of MCI WorldCom's Petition for Clarification and Reconsideration in that proceeding.

[24] UNE Remand Order, at para. 309.

WorldCom is committed to expanding this effort, both within New York State and in other states, where ILEC provisioning, operational support, and pricing make market entry feasible. Increasingly, residential customers are beginning to ask for high speed data communications as a part of their local service. As the FCC acknowledges, xDSL deployment typically occurs when bundled with voice services, and is significantly greater in the residential and small business markets (controlled almost exclusively by the ILECs) than in the large business market.[25] In fact, residential and small business customers have begun to purchase these advanced services from their incumbent local service provider, as opposed to a CLEC, by a pronounced 17 to 1 ratio.[26] Without the ability to provision DSL service on a facilities basis -- the only option remaining following the UNE Remand Order -- MCI WorldCom and other CLECs will be unable to use this vehicle to compete in the mass market.

CLEC line sharing furthers two important FCC goals: promoting competition to provide voice services over UNEs, and promoting competition to provide advanced services over CLEC facilities. Absent more explicit Commission direction, however, the ILECs have absolutely no incentive to assist their competitors in attempting to provide a robust package of voice and broadband data services to the ILECs' existing residential and small business customers. Therefore, the Commission should clarify that the Line Sharing Order requires the ILECs to allow, and undertake all necessary functions to ensure, that CLECs can combine voice UNE-P and broadband data facilities over one loop.

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[25] Line Sharing Order at para. 32.

[26] Id.; see also id. at n.61(stating that "at the end of the third quarter of 1999, incumbent LECs served approximately 178,000 residential and small business customers, while competitive LECs served less than 11,000").

B. In The Alternative, The FCC Should Reconsider Its Order

MCI WorldCom believes the Line Sharing Order did not intend to limit CLEC line sharing, and that the Commission did not intend to preclude CLECs from working together to provide voice and data services to residential and small business customers, a result that would only further entrench the ILECs as the sole service provider in those markets. Accordingly, those aspects of the decision that may be interpreted to the contrary should clarified. It is conceivable that the language in the Line Sharing Order intentionally forecloses CLECs from serving residential and small business customers by obtaining the voice, circuit-switched UNE platform from the ILECs and combining it over a single loop with DSL or other advanced broadband services provided over its own, or another CLEC's, data facilities. The Line Sharing Order does state in one place that "incumbents are not required to provide unbundled access to carriers seeking just the data portion of an otherwise unoccupied loop (often referred to as a "dry loop"). . . . [L]ine sharing contemplates that the incumbent LEC continues to provide POTS services on the lower frequencies while another carrier provides data services on higher frequencies."[27] MCI WorldCom believes this language focuses only on the situation where an ILEC is asked to lease the high frequency path of a loop which already has been leased in its entirety to a CLEC. Nevertheless, if the Order is intended to limit CLEC line sharing, that aspect of the Order should be reconsidered, to foster the development of competition in the residential and small business markets.

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[27] Line Sharing Order at para. 72.

III. CONCLUSION

For the reasons stated above, the Commission should clarify that its Line Sharing Order permits CLECs to combine, on one copper loop to a customer, (1) a voice, circuit-switched UNE platform service obtained from the ILECs and (2) packet-switched broadband facilities obtained from a CLEC, while compelling ILECs to provide necessary cross-connects, troubleshooting, and other functions at cost-based rates. Should the Commission's order somehow foreclose this option, MCI WorldCom urges the Commission to reconsider this decision, and allow broadscale voice and data competition to take hold in the residential and small business markets.

Respectfully submitted,

MCI WORLDCOM, INC.

Richard S. Whitt
Cristin L. Flynn

Its Attorneys

1801 Pennsylvania Avenue, NW
Washington, D.C. 20006
(202) 887-3845

February 9, 2000

APPENDIX A

This Appendix demonstrates that all the ILEC activities needed to allow requesting carriers to provide voice and high-speed data services over UNE-platform, either by themselves or when line-sharing with a data CLEC, are the same sorts of activities they already perform when offering voice and high-speed data services to their own end-user customers or when line sharing with a data CLEC. The Appendix also sets forth the terms and conditions on which ILECs should provide these functions because, as MCI WorldCom's experience shows, the terms and conditions on which UNEs are provided determine whether CLECs can effectively use them in practice and not just in theory.

The Commission's Line Sharing Order allows the ILEC to control the splitter if it so chooses. (Line Sharing Order at para. 76). Thus, a CLEC can offer voice and high-speed data services to end-user customers over UNE-platform, either by itself of through a line sharing arrangement with a data CLEC. Those two options are illustrated in Diagrams 1 and 2. There is no change to this configuration if the ILEC provided voice or voice and data services.

Diagram 1 shows how a CLEC provides both voice and high-speed data services over a voice and low-speed UNE-platform with an ADSL-capable loop without use of an ILEC splitter. This is the same configuration that would be used when an ILEC and a data CLEC line share, and the data CLEC provides the splitter. The customer loop comes into the MDF, where instead of using the jumper cable cross-connection that was part of the existing UNE-platform configuration (the dotted line in the diagram), an analogous simple jumper cable cross-connection takes the loop from the vertical portion of the main distribution frame (MDF) to a point in the connecting facilities arrangement (CFA) on the horizontal portion of the MDF. (Although segregation of each CLEC's

traffic in the CFA is not technically necessary, the ILECs usually require this.) All the traffic is then taken to the CLEC's splitter in or adjacent to the DSLAM in its collocation space, or to a third party data CLEC's splitter in or adjacent to the DSLAM in that data CLEC's collocation space. At the splitter in the DSLAM, the data traffic is sent off to the CLEC's data network and the voice traffic is looped back to the CFA and then to the office equipment (OE) on the MDF. The voice traffic is sent to the ILEC switch as part of UNE-platform.

As in the case of the ILEC and data CLEC line sharing, typically the connection from the CFA on the MDF to the CLEC collocation is established when the collocation is established and is viewed as part of the collocation. Charges for this connection are found in the ILEC collocation tariff or are otherwise published and generally available. The "loop back" from the collocation to the CFA is exactly the same type of connection. It also could be established when the collocation is established, but is generally established at the time of customer installation. In any case, the "loop back" too should be viewed as part of the collocation, and ILECs should be required to provide that connection at published and generally available (and, where required, tariffed) rates that follow the Commission's pricing principles. As indicated by the dotted line, the existing cross-connection in the voice and low-speed data UNE-platform configuration must be broken and replaced by the new jumper cable cross-connection to the CFA in the horizontal portion of the MDF. There should be published and generally available (and, where required, tariffed) rates already for breaking the existing cross-connection and for performing the cross-connection. Similar rates should already be available for the cross-connection between the CFA and the OE.

These ILEC activities should be subject to performance standards that minimize any down-

time for the customer. Since the connections between the MDF and the collocation space should be established at the time the collocation is established, and the two short jumper cable cross-connections should take at most a few minutes to perform, the hot cut should be performed in a matter of minutes.

Diagram 2 shows the same network configuration as Diagram 1, but where the ILEC wants to provide the splitter. (This is the same configuration that would be used when an ILEC and a data CLEC line share when the ILEC provides the splitter.) Again, the customer's loop comes into the MDF, where instead of using the jumper cable cross-connection that was part of the existing configuration (shown by the dotted line), an analogous cross-connection is jumpered from the vertical portion to the CFA in the horizontal portion of the MDF. From there, a connection would be made to the ILEC-provided splitter located near the MDF.[1] At the splitter, the voice traffic would be looped back to the MDF and then sent to the ILEC switch, while the data traffic would be looped back to a point in the CFA on the horizontal portion of the MDF associated with that data CLEC. The Commission should clarify that the ILEC's placement of its splitter, which will determine the length of the connections between the splitter and the CFA, must be done in a fashion that does not place the data CLEC at a competitive disadvantage[2] and that the rates for the splitter are published and generally available (and, where required, tariffed), and based on Commission pricing principles.

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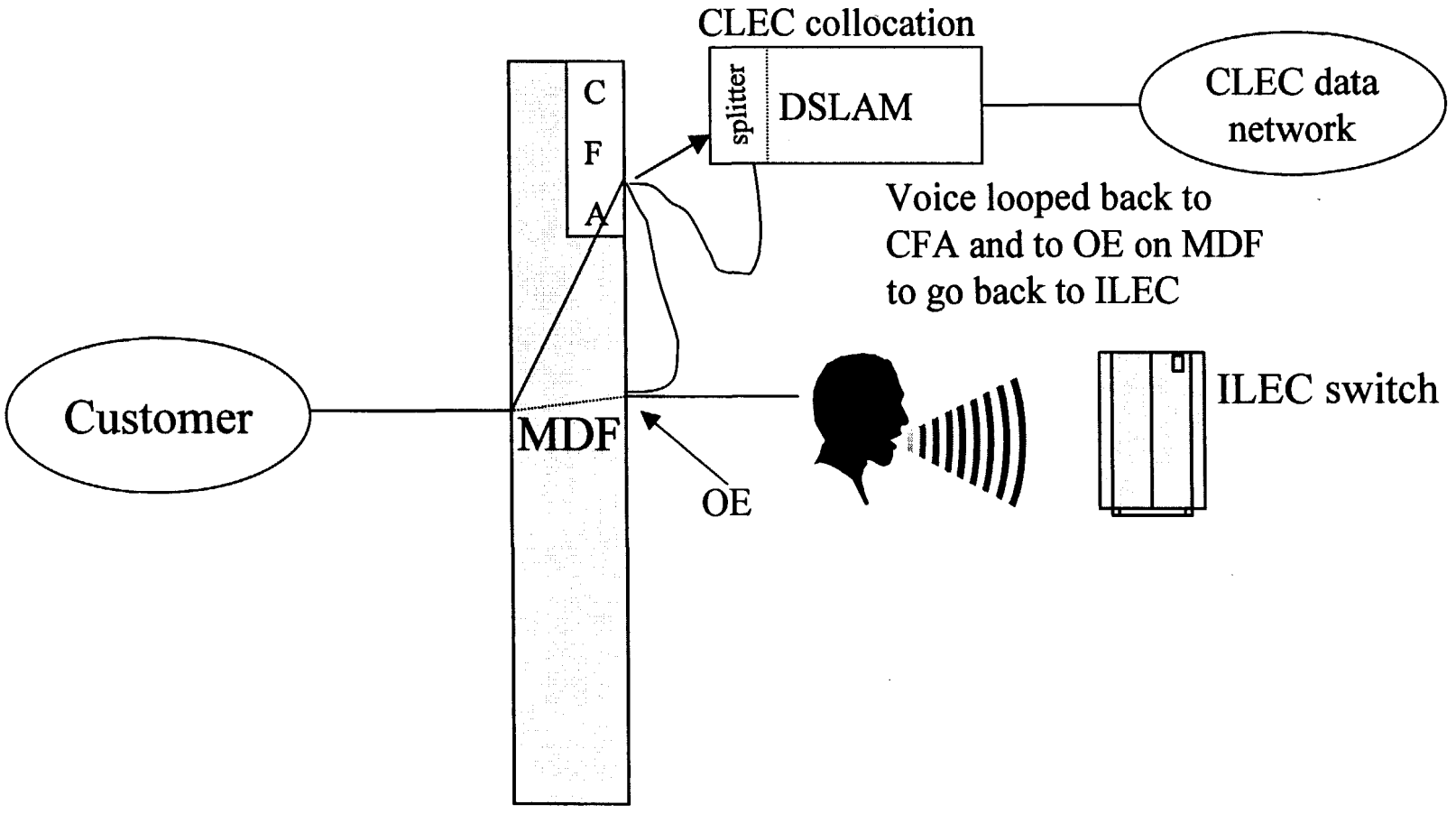
[1] The ILEC might require the CLEC to provide the splitter but insist on installing and maintaining the splitter itself, in effect setting up a virtual collocation situation.

[2] The ILEC must not be allowed to locate the splitter in a fashion that unnecessarily raises CLEC costs, for example, by locating it very far from the MDF or in a location that makes it costly to maintain.

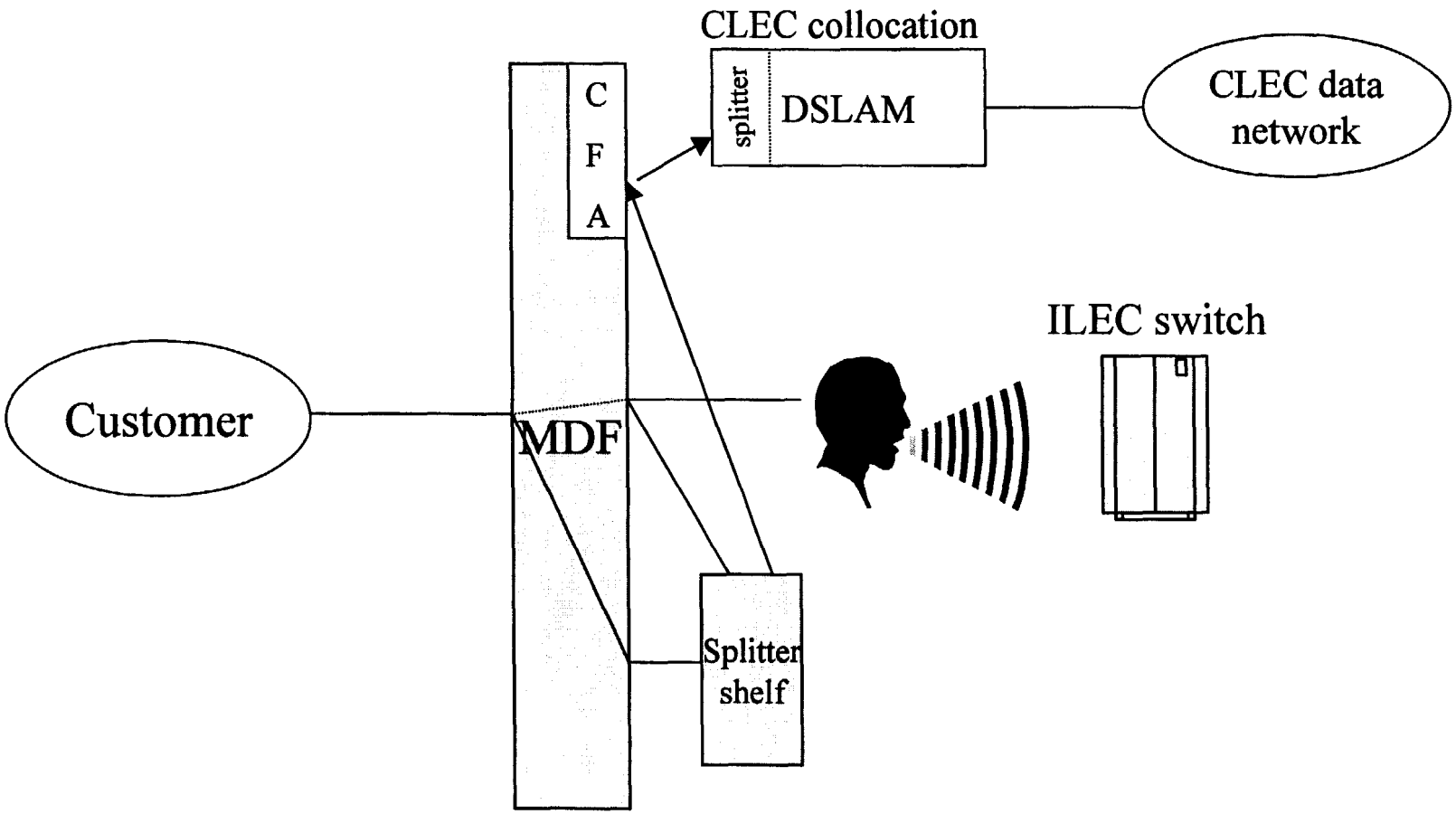
It must be stressed that there is no difference in the activities that an ILEC must perform when the ILEC itself is offering voice and high-speed data services and when a CLEC provides the same services using UNE-platform and its own (or a line sharing data CLEC's) DSL equipment. The same existing cross-connection in the customer's loop must be broken and replaced whether the customer is the ILEC's or the CLEC's.

Diagram 1 - CLEC providing both voice and high-speed data over a UNE-Platform without use of an ILEC splitter



MCI WORLDCOM

Diagram 2 - CLEC providing both voice and high-speed data over a UNE-Platform with ILEC providing splitter



CERTIFICATE OF SERVICE

I, Denise Akoto, hereby certify that I have this 9th day of February, 2000, sent a copy of the foregoing "Petition for Clarification of MCI WorldCom, Inc." in CC Docket Nos. 98-147 and 96-98, by hand delivery, to the following:

Magalie Roman Salas (one original and four copies)
Office of the Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

The Honorable William E. Kennard
Chairman
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

The Honorable Susan P. Ness
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

The Honorable Harold W. Furchtgott-Roth
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

The Honorable Michael K. Powell
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

The Honorable Gloria Tristani
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Lawrence Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Michelle Carey
Chief, Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Janice Myles (w/diskette)
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Room 5-C327
Washington, D.C. 20554

Staci Pies
Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

International Transcription Service, Inc.
CY-B40000
445 12th Street, S.W.
Washington, D.C. 20554

Denise Akoto

Denise Akoto