

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of	)	
	)	
Inquiry Concerning High-Speed Access to the	)	GN Docket No. 00-185
Internet Over Cable and Other Facilities	)	
	)	
Internet Over Cable Declaratory Ruling	)	
	)	
Appropriate Regulatory Treatment of Broadband	)	CS Docket No. 02-52
Access to the Internet Over Cable Facilities	)	
_____	)	

**NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION  
REPLY COMMENTS**

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**NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION  
REPLY COMMENTS**

**I. SUMMARY**

The National Telecommunications Cooperative Association (NTCA)<sup>1</sup> hereby files its reply comments in the above-captioned proceeding.<sup>2</sup> NTCA urges the Commission to require all cable, satellite, and wireless broadband Internet access providers to contribute to the federal universal service fund. NTCA also urges the Commission to permit all rate-of-return (ROR) regulated carriers to continue to offer their stand-alone broadband transport service as a

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<sup>1</sup> NTCA is the premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents more than 550 rural rate-of-return regulated telecommunications providers. All of its members are full service telecommunications carriers providing local, wireless, cable, Internet, satellite and long distance services to their communities. Each member is a “rural telephone company” as defined in the Communications Act of 1934, as amended (Act). And all of NTCA’s members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

<sup>2</sup> *In the Matter of Inquiry Concerning High-Speed Access to the Internet Over Cable and Other Facilities; Internet Over Cable Declaratory Ruling; Appropriate Regulatory Treatment for Broadband Access to the Internet Over Cable Facilities, Declaratory Ruling and Notice of Proposed Rulemaking, GN Docket No. 00-185, CS Docket*

“telecommunications service” and tariff it in the interstate jurisdiction. Each ROR regulated rural incumbent local exchange carrier (ILEC) should be able to recover their full cost of providing broadband Internet access service. And each ROR rural ILEC should have the option to continue to participate in the NECA pools and file interstate tariffs or, alternatively, rural ILECs that file broadband service tariffs that are not in the NECA pools should be allowed to elect Title II regulation for their broadband services.

## **II. REGULATORY PARITY**

The classification of cable modem high-speed Internet access service under Title I of the Act should not result in rules that allow one type of provider or technology to have an unfair competitive advantage over another type of provider or technology. Title I regulation should not excuse cable providers from contributing to the universal service fund (USF) given the fact they benefit directly from their interconnection to the Public Switched Network (PSN) and compete directly against wireline ILECs in the provision of high-speed Internet access service.

Most telecommunications carriers generally agree that regulatory parity should apply to all providers of high-speed Internet access service. Verizon states that all broadband providers should be treated equally regardless what regulatory platform they are using.<sup>3</sup> Verizon further states that all broadband providers should be required to contribute to the USF.<sup>4</sup> Similarly, BellSouth requests that the regulatory treatment of all broadband Internet access providers should be identical.<sup>5</sup> If the Commission fails to remove the restrictions that now apply to the provision of broadband services by ILECs, BellSouth recommends that Title II regulation be

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No. 02-52, FCC 02-77, (rel. March 15, 2002)(Declaratory Ruling and NPRM).

<sup>3</sup> Verizon Initial Comments, pp. 6-10, 17-23 (June 17, 2002).

<sup>4</sup> *Id.*, pp. 30-32.

imposed upon all providers of cable modem service.<sup>6</sup>

SBC also asserts that the Commission should apply minimal regulation for all broadband Internet access providers.<sup>7</sup> If the FCC imposes any regulation on broadband Internet access services, SBC recommends that the Commission establish a national regulatory framework under Title I that applies to all competing broadband services.<sup>8</sup> USTA states that cable modem service and wireline broadband Internet access service should receive the same regulatory treatment.<sup>9</sup> USTA also recommends that the FCC should exercise its authority under Section 254(d) and require cable-modem service providers to contribute to the universal service fund based on their provision of interstate telecommunications as an integrated element of their interstate information service.<sup>10</sup>

The cable providers generally oppose regulatory parity, particularly on the issue of required open access. Comcast argues that the “Commission should recognize that ‘regulatory parity’ is not a basis for imposing common carrier obligations on information service providers including cable companies offering high-speed Internet services.”<sup>11</sup> Comcast further states that the Commission must recognize that invoking regulatory parity as a basis for imposing forced access on cable companies would sow the seed of new disparities and inevitably lead to still greater intrusion into currently regulated businesses.<sup>12</sup> Cablevision agrees that saddling cable operators with new regulatory requirements will not promote the Congressional goal of

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5 BellSouth Initial Comments, p. 2 (June 17, 2002).

6 *Id.*

7 SBC Initial Comments, p. 3 (June 17, 2002).

8 *Id.*

9 USTA Initial Comments, pp 5-8. (June 17, 2002).

10 *Id.*, pp. 10-11.

11 Comcast Communications Initial Comments, p. 25 (June 17, 2002).

12 *Id.*, p. 27.

accelerating the deployment of broadband services.<sup>13</sup> And, AT&T states that open access regulation of cable Internet services is “unwarranted because cable operators have clear incentives to maximize usage of broadband services and to reach commercially reasonable deals with ISPs.”<sup>14</sup>

The National Cable Telecommunications Association claims that forced access is not necessary to encourage reasonable and timely development of advanced telecommunications capability to all Americans.<sup>15</sup> It states that force access would likely stifle the deployment of broadband facilities and diminish the efficiency and increase the cost of providing cable modem service to consumers.<sup>16</sup> Similarly, the American Cable Association states that where smaller markets are concerned, imposing burdensome regulations, such as open access, on cable modem services offered by small cable companies will chill investment and stall deployment.<sup>17</sup> Charter Communications further states that there is “no basis to impose rate or other business regulations on the provision of cable modem services, such as third party access to the cable plant.”<sup>18</sup> And, AOL Time Warner Inc., recommends that the Commission continue to allow cable operators to develop their own business plans to carry multiple Internet service providers (ISPs), rather than have the government dictate these requirements.<sup>19</sup>

None of the cable providers deny the fact that they are using their platforms to provide high-speed cable modem Internet access service in direct competition with telecommunications carriers, using their platforms to provide high-speed DSL Internet access service. Nor do they

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13 Cablevision Systems Corporation Initial Comments, p. 12 (June 17, 2002).

14 AT&T Initial Comments, p. 6 (June 17, 2002).

15 National Cable Telecommunications Association Initial Comments, p. 2 (June 17, 2002).

16 *Id.*

17 American Cable Association Initial Comments, p. 7 (June 17, 2002).

18 Charter Communications Inc., Initial Comments, p. 12 (June 17, 2002).

deny the fact they are not under the same open access requirements and universal service obligations as their competing telecommunications carriers. Indeed, the current regulatory regime provides neither open access requirements nor universal service obligations as are imposed on Regional Bell Holding Companies (RBOCs) and rural telephone companies.

Under the Commission's existing contribution rules, telecommunications carriers providing "telecommunications services,"<sup>20</sup> including broadband transmission services, are required to make USF contributions to the extent they provide ***broadband transmission services*** or other telecommunications services on a stand alone basis to affiliated or non-affiliated ISPs or end-users.<sup>21</sup> These rules do not currently apply to cable, wireless, and satellite providers of broadband transmission services or broadband Internet access.<sup>22</sup> Even though cable modem service is not a "telecommunications service," as defined by the Act, the facility used to provide cable modem Internet access service is indeed a telecommunications facility because it is a pipeline for the "telecommunications" (i.e., for the transmission of information for the user's choosing, without change in form or content).<sup>23</sup>

The Commission is tentatively proposing to redefine certain wireline ILEC broadband services as "telecommunications" and place these services on a regulatory parity basis with

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19 AOL Time Warner Inc., Initial Comments, p. i (June 17, 2002).

20 *Telecommunications service* is the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available to the public, regardless of facilities used. *Telecommunications* is the transmission, between and among points specified by the user, of information of the user's choosing, without change in form or content of the information as sent and received. *Information service* is the offering of a capability of generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications.

21 *In the Matter of Appropriate Framework for Broadband Access to the Internet Over Wireline Facilities*, CC Docket No. 02-33, *Universal Service Obligations of Broadband Providers*, and *Computer III Further Remand Proceeding: Bell Operating Company Provision of Enhanced Services: 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards and Requirements*, CC Dockets Nos. 95-20, 98-10, FCC 02-42, Notice of Proposed Rulemaking (NPRM) ¶¶ 71 and 72 (rel. Feb. 15, 2002).

22 *Id.* ¶ 79.

“cable modem” services. If the Commission concludes that wireline broadband Internet access service is “telecommunications” it should place cable modem and wireline broadband Internet access service on an equal regulatory footing, at least on the issue of universal service contributions. It should also take measures to preserve the rural exemption in Section 251(f). That exemption relieves rural telephone companies of interconnection obligations that would harm the public interest or are not suitable in certain rural markets. The exemption should not be defeated by Commission rules aimed at creating regulatory parity in situations that are not typically rural.

As technology changes, the consumer will be unable to distinguish the services and features of one type of provider from those of another. Different facilities and technologies are emerging as substitutes for traditional circuit switched telecommunications services and broadband Internet access services. Interstate traffic is migrating to these facilities and the carriers that operate them benefit from the nation-wide network made possible by universal service. Requiring only ILECs to contribute to the universal service fund places ILECs at a distinct competitive disadvantage.

To the extent that the Commission is concerned about regulatory parity and the sustainability of an adequate revenue base for its interstate USF mechanisms, it should require all providers of broadband transmission or other telecommunications services to affiliated or non-affiliated ISPs or end-users on a stand-alone basis to contribute on an equitable and non-discriminatory basis.<sup>24</sup> The Commission should use its permissive authority under Section 254 of the Act to assess the telecommunications component of cable modem Internet access service.

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23 *MediaOne Group Inc. v. County of Henrico*, 257F.3d 356, 363 (4<sup>th</sup> Cir. 2001).

Wireless and satellite providers who provide high-speed Internet access service should also be assessed. Carriers that benefit from universal service should not be allowed to escape the obligation of support just because they bundle services or escape designation as “telecommunications carriers.” Expanding the list of contributors to the universal service fund is critical to the continued success of universal service and ensuring regulatory parity among all providers of high-speed access to the Internet.

**III. THE STAND-ALONE xDSL TRANSMISSION SERVICES OFFERED BY RATE-OF-RETURN REGULATED CARRIERS ARE A “TELECOMMUNICATIONS SERVICE.”**

Notwithstanding the classification of cable modem broadband Internet access service as “information service,” ROR regulated carriers should be permitted to continue to offer their stand-alone broadband transport service as a “telecommunications service” and tariff it in the interstate jurisdiction. Rural ILECs should also have the option to continue to participate in the NECA pools and file interstate tariffs or, alternatively, rural ILECs that file broadband service tariffs that are not in the NECA pools should be allowed to elect Title II regulation for their broadband services. This will ensure the continued effective deployment of high-speed Internet access services in rural areas of the country at reasonable rates.

When a ROR regulated rural ILEC offers a high-speed transmission path available on a stand alone basis pursuant to a NECA tariff, it is offering a “telecommunications service.” Under this scenario, rural ILECs do not combine the transmission portion with the offering of information services; they merely offer telecommunications to the public (any ISP). Most NTCA members offer broadband transmission services such as DSL on a stand-alone basis.

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24 47 U.S.C. §254(d).

These services are tariffed and offered to any qualifying entity under identical terms and conditions. Any carrier, including a subsidiary of the offering carrier, may purchase the transmission. The fact that a subsidiary of the transmission provider offers the Internet access does not change the fact that the transmission portion is offered on a stand-alone basis. The transmission and Internet access are not combined and offered by the ILEC on an integrated basis. The tariffed broadband transmission is a “telecommunications service.”

In order for broadband transmission to be classified as “telecommunications service” it must be offered for a fee “directly to the public, or to such classes of users as to be effectively available to the public.” The Commission questions whether the provision of xDSL on a wholesale basis as an input to ISPs’ information services is being offered “directly to the public.”

Previously, the Commission determined that “telecommunications services” means “only telecommunications provided on a common carrier basis.”<sup>25</sup> The term “common carriage” has thus been used to define “the public.” The “key factor” for a common carrier determination is said to be “that the operator offer indiscriminate service to whatever public its service may legally and practically be of use.”<sup>26</sup> There is no requirement that a service be offered at retail.

In 2000, the Commission found that Iowa Communications Network (ICN) was a common carrier even though it did not offer service to all potential users.<sup>27</sup> The FCC determined that ICN offered its services to qualified users on generally available terms and conditions and did not make individualized decisions, in particular cases, whether and on what terms to deal.

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<sup>25</sup> *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC 8776, 9177 (1997).

<sup>26</sup> *Nat’l Assoc. of Regulatory Util. Commissioners v. FCC*, 525 F.2d 630 (D.C. Cir.), cert. Denied, 425 U.S. 992 (1976).

<sup>27</sup> *Federal-State Joint Board on Universal Service*, Order on Remand, CC Docket No. 96-45, 16 FCC Red 571 (2000), on remand from the D.C. Circuit, *State of Iowa v. FCC*, 218 F.3d 756 (D.C. Cir. 2000), affirmed *United States Telecom Association v. FCC*, No. 01-1085 (D.C. Cir. slip op. July 16. 2002).

The Commission determined that the key factor is whether an entity “offers indiscriminate service to whatever public it is legally authorized to service.”<sup>28</sup>

Following this reasoning, to make a determination of whether a service is being offered “directly to the public,” it is appropriate to determine the “public” for whom a service is of legal or practical use, and then determine whether the service is offered indiscriminately to that public.

ROR carriers that offer xDSL through the NECA tariff offer the service for a fee on a wholesale basis to any and all interested ISPs on identical terms and conditions. The service is offered to ISPs because they are the parties for whom the service is of “practical use.” ISPs, not their retail customers, purchase the service from the LEC in much the same way that other carriers purchase interstate access services from other LECs. The service is available to a class of users (the ISPs) so as to be effectively available directly to the public, thus fitting squarely within the definition for “telecommunications service.” The xDSL service that NECA tariff participants offer on a wholesale basis, as an input to ISPs’ information service, is a “telecommunications service.” The ILECs offer and do not change the form or content of the information that is transmitted over xDSL facilities.<sup>29</sup>

ROR regulation enables independent rural ILECs to obtain the capital necessary to build, operate and maintain telecommunications facilities. ROR regulation minimizes the risks involved, providing investors and lenders a reasonable degree of assurance that the rural incumbent LEC will remain financially solvent. It has helped small and rural carriers grow and provide quality, reliable and affordable telecommunications services to rural America.

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28 *Id.*, ¶ 9.

29 See, *In the Matter of Wireline Services Offering Advanced Telecommunications Capability, Second Report and Order*, 14 FCC Rcd 19237, 19247 concluding that DSL services targeted to ISPs are a “telecommunications”

The NECA pooling structure, in place for the last two decades, similarly works as a stabilizing factor for small carriers by reducing administrative costs, creating incentives and spreading the substantial risks of investing in rural areas among its participants. ROR regulation and the pooling structure have enabled rural carriers to not only survive, but to thrive. Americans living in remote and difficult to serve regions of the United States have access to state of the art telecommunications services because of it.

ROR carriers face different challenges and market conditions than their urban counterparts. The tariffing of broadband transport within the NECA pool permits ROR carriers to share risks and offer xDSL services at attractive rates. Many ROR regulated rural incumbent LECs are offering xDSL today.<sup>30</sup> However, ubiquitous deployment is very costly. The upgrading of certain long loops is estimated to cost almost \$10,000 per loop.<sup>31</sup> Full deployment requires a substantial investment, yet rural carriers lack the subscribers over which to spread the cost. Without the pool, many rural carriers would be forced to forego providing high-speed service because they would have to price it out of the range of affordability. The rural consumer would suffer and lag technologically behind those residing in urban areas, counter to the expressed goals of the Act.

While not all wireline broadband Internet access service will currently meet the Commission's definition of "advanced telecommunication service,"<sup>32</sup> the existence of the NECA pools is a necessary predecessor to advanced services roll out. The Commission should not

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service.

30 NTCA 2001 Internet/Broadband Availability Survey (Dec. 2001), available at [www.ntca.org](http://www.ntca.org).

31 NECA Rural Broadband Cost Study: Summary of Results, p. 4 (June 21, 2000).

32 The Commission has defined "advanced telecommunications capability" as having the capability of supporting downstream upstream speeds in excess of 200 kilobits per second (kbps) in the last mile. *Second Section 706 Report*, 15 FCC Rcd at 20919-20920.

abandon policies and practices that have promoted broadband deployment in rural areas.

#### IV. CONCLUSION

Based on the above reasons, the Commission should require all cable, satellite, and wireless broadband Internet access providers to contribute to the federal universal service fund. Failing to position these carriers on equal footing with existing contributors will continue to place existing wireline ILECs at a distinct competitive disadvantage in the high-speed Internet access services market and further drain revenues from the existing USF assessment base.

The Commission should also permit ROR regulated carriers to continue to offer their stand-alone broadband transport service as a “telecommunications service” and tariff it in the interstate jurisdiction. Rural ILECs should also have the option to continue to participate in the NECA pools and file interstate tariffs or, alternatively, rural ILECs that file broadband service tariffs that are not in the NECA pools should be allowed to elect Title II regulation for their broadband services. This will ensure the continued effective deployment of high-speed Internet access services in rural areas of the country at reasonable rates.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Reply Comments of the National Telecommunications Cooperative Association in GN Docket No. 00-185, CS Docket No. 02-52, FCC 02-77 was served on this 6th day of August 2002 by first-class, U.S. Mail, postage prepaid, to the following persons.

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