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

In the Matter of)
)
Petition by the Colorado Public Utilities)
Commission, Pursuant to 47 C.F.R.)
§ 54.207(c), for Commission Agreement)
in Redefining the Service Area of)
CenturyTel of Eagle, Inc.,)
A Rural Telephone Company)

CC Docket No. 96-45

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

APPLICATION FOR REVIEW
OR, ALTERNATIVELY, PETITION FOR RECONSIDERATION
OF CENTURYTEL OF EAGLE, INC.

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Summary

The Colorado Public Utilities Commission recently adopted rules requiring that a rural telephone company's service area be redefined in accordance with the method the carrier elected for purposes of disaggregating support. On August 1, 2002, the Colorado PUC submitted to the FCC a petition proposing to designate each of CenturyTel's 53 wire centers or exchanges as separate service areas, based on CenturyTel's disaggregation plan. Under the FCC's rules, if the FCC fails to act on a state petition within 90 days of the public notice release date, the service area redefinition is deemed approved by the FCC. Notwithstanding the comments of three parties objecting to the Colorado Petition, the FCC allowed the Colorado Petition to become effective automatically without issuing a decision explaining the basis for its decision.

Section 214(e)(5) of the Communications Act of 1934, as amended, requires the FCC to take into consideration the Federal-State Joint Board's recommendations before changing the service area for a rural telephone company. Without a written decision, there is no evidence that the FCC actually considered the Joint Board's recommendations. CenturyTel urges the FCC to immediately issue an order tolling the effective date of the Colorado Petition until the Joint Board has made its recommendation regarding the interplay between the level of disaggregation of support and changes in rural service area definitions.

The Colorado Petition does not serve the public interest for the following reasons:

- It will encourage carriers to engage in cherry picking of CenturyTel's best customers without any commitment to provide service throughout CenturyTel's study:
- It fails to acknowledge that the Act permits CETCs to receive support for services provided through a combination of facilities-based service and resale:

- It will result in inefficient market entry;
- It violates important Section 254 goals; and
- It places increasing pressure on universal service support.

The FCC should decline on reconsideration to adopt the COPUC Petition, or it should issue an order explaining why the Colorado Petition is consistent with the Joint Board's recommendations.

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**APPLICATION FOR REVIEW
OR, ALTERNATIVELY, PETITION FOR RECONSIDERATION
OF CENTURYTEL OF EAGLE, INC.**

In accordance with the rules of the Federal Communications Commission (“FCC”), CenturyTel of Eagle, Inc. (“CenturyTel”), through its attorneys, hereby requests that the FCC review or, alternatively, reconsider’ its decision in the above-captioned proceeding to allow the Petition of the Colorado Public Utilities Commission (“Colorado PUC” or “COPUC”) to become effective automatically.² The FCC’s failure to issue a written decision addressing the comments filed in this proceeding, and the consequent granting of the COPUC Petition, conflicts with the statute and established FCC policy,

Because the FCC did not issue a decision in this proceeding, it is unclear whether CenturyTel should file an application for review pursuant to Section 1.115 of the FCC’s rules, or if it should file a petition for reconsideration pursuant to Section 1.106 of the FCC’s rules. 47 C.F.R. § 1.115; 47 C.F.R. § 1.106. The FCC’s rules delegate authority under Sections 54.207(c) and (d) to the Chief of the Wireline Competition Bureau. 47 C.F.R. § 54.207(e). The rules also provide that, if the Commission fails to act on a state petition under this section, the petition shall “be deemed approved by the [FCC].” 47 C.F.R. § 54.207(c)(3)(ii) (emphasis added). In light of the delegation of authority to act (or not to act), CenturyTel hereby files an application for review of the Bureau’s decision not to act on the Colorado Petition. In the alternative, if the FCC is deemed to have acted on the underlying Colorado Petition, CenturyTel requests that this filing be treated as a petition for reconsideration.

The Colorado Public Utilities Commission Petitions to Redefine the Service Area of CenturyTel of Eagle Inc. in the State of Colorado, Public Notice (rel. Aug. 26, 2002) (“Public Notice”).

I. INTRODUCTION AND BACKGROUND

On May 13, 2002, CenturyTel elected to disaggregate and target universal service support pursuant to Path 3 of the FCC's rules.³ CenturyTel, a rural telephone company, calculated support by designating each wire center⁴ in one of two support zones for the entire study area, a low-cost zone and a high-cost zone. Each of the 53 wire centers represents a CenturyTel exchange. The Colorado PUC adopted rules requiring that a rural telephone company's service area be redefined in accordance with the method the carrier elected for purposes of disaggregating support.⁵ However, the Colorado PUC did not propose to define two new service areas for CenturyTel, matching the two support zones CenturyTel elected for universal service disaggregation. Rather, on August 1, 2002, the Colorado PUC submitted to the FCC a petition proposing to designate each of CenturyTel's 53 wire centers or exchanges as separate service areas.⁶ This would serve the purpose of defining the minimum area a competitive eligible telecommunications carrier ("CETC") would be required to serve.

The FCC issued a Public Notice on August 26, 2002, seeking comment on the Colorado PUC's redefinition of CenturyTel's service area.⁷ CenturyTel filed comments in this proceeding on September 13, 2002.⁸ Four entities filed reply comments.⁹ The FCC's rules

³ CenturyTel of Eagle, Inc. Study Area Code No. **462185** at 174, filed May 13, 2002 ("Disaggregation Plan"). See Attachment 1

⁴ Although CenturyTel's Disaggregation Plan states that it has **53** wire centers, wire center in this context is synonymous with exchange area.

⁵ *In the Matter of the Proposed Amendments to the Rules Concerning the Colorado High Cost Support Mechanism, 4 CCR 723-41, and the Rules Concerning Eligible Telecommunications Carriers, 4 CCR 723-42*, Ruling on Exceptions and Order Vacating Stay, Decision No. CO2-319 (rel. Mar. 18, 2002).

⁶ Petition by the Colorado Public Utilities Commission, Pursuant to 47 C.F.R. § 54.207(c), for Commission Agreement in Redefining the Service Area of CenturyTel of Eagle, Inc., a Rural Telephone Company (filed **Aug. 1**, 2002) ("Colorado Petition").

⁷ Public Notice, *supra* note 2

⁸ CenturyTel Comments filed in CC Docket No. **96-45** on Sept. **13**, 2002 ("CenturyTel Comments")

provide that, if the FCC fails to act on the state petition within 90 days of the Public Notice release date, the study area definition proposed by the state is “deemed approved by the [FCC] and shall take effect in accordance with state procedures.”” Because the FCC did not act on the Colorado Petition within 90 days of the release of the Public Notice, the proposed redefinition of CenturyTel’s service area was deemed approved by the FCC on November 25,2002.

Notwithstanding the comments of three parties objecting to the COPUC Petition, the FCC failed to issue an order explaining the basis for its decision and instead allowed the Colorado Petition to become effective automatically. The FCC did not even issue a public notice acknowledging that the Colorado Petition had been granted.

II. SECTION 214(E)(5) OF THE COMMUNICATIONS ACT REQUIRES THE FCC TO TAKE INTO CONSIDERATION THE FEDERAL-STATE JOINT BOARD’S RECOMMENDATIONS BEFORE CHANGING THE SERVICE AREA FOR A RURAL TELEPHONE COMPANY.

A. The Plain Language of the Act Requires the FCC to Be Active, Not Passive, in Considering State Petitions.

For areas served by a rural telephone company, Section 214(e)(5) of the Communications Act of 1934, as amended,“ provides that the company’s “service area” for federal support purposes” will be its study area “unless and until the Commission and the States, after taking into account the recommendations of a Federal-State Joint Board . . . , establish a

⁹ ITTA Reply Comments tiled in CC Docket No. 96-45 on Sept. 27,2002 (opposing Colorado Petition); NRTA, OPASTCO, Western Alliance and CTA Reply Comments filed in CC Docket No. 96-45 on Sept. 27, 2002 (opposing Colorado Petition); Colorado Public Utilities Commission Reply Comments **filed** in CC Docket No. 96-45 on Sept. 27, 2002 (supporting Colorado Petition); N.E. Colorado Cellular, Inc. Reply Comments filed in CC Docket No. 96-45 on Sept. 27, 2002 (supporting Colorado Petition).

¹⁰ 47 C.F.R. § 54.207(c)(3)(ii)

¹¹ 47 U.S.C. § 151 *et seq.*

¹² Section 54.207(a) of the **FCC’s** rules defines service area as the geographic area “for **which** the carrier shall receive support from federal universal service support mechanisms.” 41 C.F.R. § 54.207(a).

different definition of service area for such company.”” The plain language of the statute mandates that both the state *and* the FCC must take the Federal-State Joint Board’s recommendations into consideration before establishing a different service area definition for a rural telephone company. Despite the plain language of Section 214(e)(5) and without any explanation for its decision,¹⁴ the FCC adopted procedural rules in 1997 that allow a rural carrier’s service area definition to be changed without the issuance of a written FCC decision demonstrating that the FCC actually considered the Federal-State Joint Board’s recommendations before adopting the new service area definition. Specifically, Section 54.207(c)(3)(ii) of the FCC’s rules provides that, if the FCC declines, as it did in the present case, to act on the petition within 90 days of the public notice, the petition will automatically be deemed approved by the FCC.

Contrary to the FCC’s interpretation, Section 214(e)(5) requires the FCC to justify its support for the Colorado PUC’s proposed service area definition change. Had Congress intended for the FCC to simply allow state petitions for redefinition of service areas to automatically be deemed approved absent an FCC decision, it could have written such a statute. That Congress did not intend to write a statute that automatically grants approval in the absence of commission action within a specified period of time is evidenced in the language of Section 252(e)(4) of the Act. Section 252(e)(4) provides that “[i]f the State Commission does not act to approve or reject the agreement within 90 days after submission by the parties . . . the agreement

¹³ 47 U.S.C. § 214(e)(5). The FCC’s rules reiterate the presumption that the service area for universal service funding purposes should be the rural LEC’s entire study area and sets forth the requirement for state petitions in order to change that definition. 47 C.F.R. § 54.207(a).

¹⁴ *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8716 at 8881, ¶188 (1997).

shall be deemed approved.”” Clearly, Congress could have written a similar statute with respect to changing service area definitions for rural telephone companies; however, it did not. Rather, Congress expressly required the FCC to establish (with the state) a different service area only after taking into consideration the Joint Board’s recommendations. Here, the FCC’s role in “establishing” a different service area was entirely passive and conflicts with the statute. Without a written decision, there is no evidence that the FCC actually considered the Joint Board’s recommendations, as required by Section 214(e)(5).

B. The FCC Has Not Complied with the Statutory Mandate to Consider the Recommendations of the Joint Board.

There is no evidence that the FCC considered the Joint Board’s recommendation regarding parallel funding disaggregation and entry disaggregation. Indeed, only 17 days prior to the Colorado Petition becoming effective on November 25, 2002 did the FCC seek the Joint Board’s recommendation on these issues.¹⁶ Until the Joint Board makes its recommendations, the FCC should keep open the proceeding involving the COPUC Petition.

In prior proceedings, the FCC has declined to find that proposals similar to COPUC’s would serve the public interest. Notably, in the *RTF Order*, the FCC merely suggested that the states should consider the level of disaggregation of support in determining whether to certify new CETCs for study areas other than a rural carrier’s study area.” In its petition for reconsideration of the *RTF Order*, the Competitive Universal Service Coalition

¹⁵ 47 U.S.C. § 252(e)(4).

¹⁶ *Federal-State Joint Board on Universal Service*, FCC 02-307, 2002 FCC LEXIS 6052, *17, Order (rel Nov. 8, 2002).

¹⁷ *In the Matter of Federal-State Joint/Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, 16 FCC Rcd 11244 at ¶164 (2001) (“*RTF Order*”).

(“CUSC”) proposed that, whenever support is disaggregated, the study area also should be automatically disaggregated.’* The FCC rejected CUSC’s proposal as being inconsistent with the language of Section 214(e)(5).¹⁹

Neither the FCC nor the Joint Board has provided any significant guidance on parallel funding disaggregation and entry disaggregation. Consequently, it is apparent that the FCC failed to satisfy its Section 214(e)(5) obligation to take into consideration the Joint Board’s recommendation before changing CenturyTel’s study area.

C. FCC Practice Favors An Order in Contested Proceedings.

In the case where oppositions are filed, as is the case here, it is particularly important for the FCC to explain why it is rejecting arguments raised in opposition to the underlying petition. As the FCC’s rules contemplate, a party adversely affected by a Bureau or FCC decision has the right to seek review or consideration of that decision. In order to seek review of an adverse decision, appellants must file either an application for review” or a petition for reconsideration” within thirty days from the date of the FCC’s action. Absent a written decision, however, the FCC’s basis for rejecting CenturyTel’s opposing arguments is unknown, thereby severely limiting CenturyTel’s and others’ ability to refute the FCC’s conclusions and its underlying assumptions. For this reason, Section 54.207(c)(3)(ii) of the FCC’s rules interferes with a party’s ability to seek review of a service area definition change and should be rescinded.

¹⁸ Petition for Reconsideration of the Competitive Universal Service Coalition, filed in CC Docket No. 96-45, CC Docket No. 00-256 on July 5, 2001 at 10-11

¹⁹ *In the Matter of Federal-State Joint Board on Universal Service; Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Petitions for Reconsideration filed by: Coalition of Rural Telephone Companies. Competitive Universal Service Coalition, Illinois Commerce Commission, National Telephone Cooperative Association, Order on Reconsideration, 17 FCC Rcd 11472, ¶17 (2002).*

²⁰ 47 C.F.R. § 1.115.

²¹ 47 C.F.R. § 1.106.

D. The FCC Should Issue **an** Order in the Delta County Tele-Comm, Inc. Proceeding.

The FCC should not have permitted the Colorado Petition to automatically become effective without issuing an order. The FCC either should have initiated a proceeding pursuant to Section 54.207(c)(3(i) of its rules to seek comment regarding the novel issues raised, or it should have issued an order explaining why the Colorado Petition was granted in the face of opposition from parties raising policy concerns about dividing CenturyTel's study area into 53 service areas at the wire center level and the need for a Joint Board recommendation regarding parallel funding disaggregation and entry disaggregation prior to granting the Colorado Petition.²²

The issues raised in the Colorado Petition will have a precedential affect on the ETC designation process throughout the country. Similar novel issues affecting universal service support are being raised in state CETC designation proceedings, and the FCC has a statutory obligation to consider the impact of the various state proposals on the public interest,²³ particularly in light of the increasing demands on the universal service support fund. Yet, it appears that the FCC is simply rubber-stamping the states' actions. Similarly, the states are endorsing the CETC designation requests without any independent public interest analysis.

The FCC's failure to fully consider the Joint Board's recommendations before changing CenturyTel's service area definition and to issue a written decision violate the letter and spirit of Section 214(e)(5) and represent an absolute abdication of the FCC's statutory responsibilities. For this reason, CenturyTel urges the FCC to immediately issue **an** order *tolling*

²² CenturyTel Comments at 5-7; Comments of NRTA, OPASTCO, Western Alliance and CTA at 4.

²³ 47 U.S.C. § 214(e).

the effective date of the Colorado Petition until the Joint Board has made its recommendation regarding the interplay between the level of disaggregation of support and changes in rural study area definitions. Alternatively, the FCC should issue an order explaining why the Colorado Petition is consistent with the prior recommendations of the Joint Board, or declining to establish a new service area if the FCC agrees with CenturyTel that the proposed service area does not serve the public interest.

The FCC currently has before it a similar petition proposed by the Colorado PUC to redefine the service area of Delta County Tele-Comm, Inc. in accordance with the method Delta County Tele-Comm elected for purposes of disaggregating support.²⁴ Delta County Tele-Comm and other parties filed comments in that proceeding opposing the redefinition of Delta County Tele-Comm's study area into six service areas.²⁵ The FCC can avoid making the same mistake of allowing the proposed study area redefinition automatically to become effective by initiating a proceeding pursuant to Section 54.207(c)(3)(i) of the FCC's **rules** to consider the issues raised therein. As explained in Delta County Tele-Comm's comments and herein, the Joint Board has not made any recommendations regarding the issue of parallel funding disaggregation and entry disaggregation. Unless the FCC initiates a proceeding to consider these issues, the Colorado Petition automatically will become effective and serve as precedent in Colorado and other states, thereby adversely affecting rural telephone companies and their customers.

²⁴ *The Colorado Public Utilities Commission Petitions to Redefine the Service Area of Delta County Tele-Comm, Inc. in the State of Colorado*, Public Notice (rel. Sept. 25, 2002).

²⁵ Comments of Delta County Tele-Comm, Inc. and the Colorado Telephone Association, filed in CC Docket No. 96-45 on Oct. 15, 2002; Comments of United States Telecom Association, filed in CC Docket No. 96-45 on Oct. 15, 2002; Reply Comments of the National Telecommunications Cooperative Association, filed in CC Docket No. **96-45** on Oct. 25, 2002.

III. THE COLORADO PETITION IS NOT IN THE PUBLIC INTEREST AND SHOULD BE REJECTED.

CenturyTel hereby incorporates by reference its comments filed in the underlying proceeding.²⁶ As stated therein, CenturyTel's disaggregation filing established two support zones for the entire study area – not 53. CenturyTel's wire centers are particularly rural and sparsely populated. The number of access lines per wire center ranges from **96** to 8,679. Twelve of the 53 wire centers have fewer than 500 access lines, while only 3 of the wire centers have more than 5,000 access lines. The monthly costs for wire centers within the same zone vary, for example, ranging from \$45.91 per line to \$209.14. Because support is averaged across the zone, support may be relatively high in certain wire centers, while relatively **low** in others. Consequently, rather than eliminate cherry-picking, as the Colorado PUC claims, its proposal to divide CenturyTel's study area into 53 wire centers actually will encourage carriers to engage in cherty picking of CenturyTel's best least-cost, highest-profit customers.²⁷

As CenturyTel and another commenter pointed out, promoting competitive entry alone is not enough of a justification to satisfy the public interest standard set forth in Section 214(e).²⁸ Nor will the Colorado Petition bring consumers the competitive choice that the Colorado PUC claims it will because CETCs are not required to provide service throughout CenturyTel's study area. The Colorado PUC failed to analyze the impact of its proposal on CETCs' incentives to serve only the more profitable wire centers. COPUC simply assumed, with no justification, that "the possibility of cream skimming by competitive ETCs has been

²⁶ CenturyTel Comments, *supra* note 8

²⁷ See Reply Comments of IITA at 5

²⁸ Reply Comments of NRTA, OPASTCO, Western Alliance and CTA at 9-12

minimized, if not eliminated,” in light of CenturyTel’s decision to disaggregate support.²⁹ The Colorado Petition is based on **an** erroneous assumption that some carriers have been unable to obtain ETC designation because they lack the facilities to provide service throughout the entirety of the CenturyTel service area.” The Colorado PUC fails to acknowledge, however, that the Act permits CETCs to receive support for services provided through a combination of facilities-based service and resale.³¹ Simply put, the lack of facilities does not preclude CETCs from serving the ILEC’s entire study area. The Colorado PUC fails to address this reality.

Moreover, the blanket nature of the Colorado Petition violates the FCC’s principle of competitive neutrality³² and will open the floodgates for all CETCs to “cherry pick” wire centers without having to offer any justification as to why their proposed service areas serve the goals of Section 254. As one party that filed comments in opposition to the COPUC proposal pointed out, Section 254 requires that support be “sufficient” and “predictable.”³³ However, with the increasing demands on universal service support by CETCs, there is concern that the growth of the universal service fund may not be commensurate with the public interest benefits.¹⁴ Proposals like COPUC’s do not advance Section 254’s requirements that telecommunications services be offered at just, reasonable and affordable rates³⁵ and that services in rural areas be reasonably comparable to services in urban areas.” The FCC should reject the Colorado Petition

²⁹ Reply Comments of ITTA at 5.

³⁰ Colorado Petition at 7.

³¹ 47 C.F.R. § 54.201(d).

³² *Id.* at 6.

³³ Reply Comments of NRTA, OPASTCO, Western Alliance and CTA at 11-12

³⁴ *Id.* (noting that the FCC has initiated a proceeding to examine these issues).

³⁵ 47 U.S.C. § 254(b)(1).

³⁶ 47 U.S.C. § 254(b)(3).

because it will result in inefficient market entry, it fails to serve the public interest, and it violates important Section 254 goals. The FCC's failure to issue an order explaining the basis for its decision is particularly problematic in this case because the Colorado Petition raises issues that **will** have a far-reaching impact on the entire industry and are critical to an efficient universal service support system – not just in Colorado but throughout the country.

IV. CONCLUSION

For the reasons articulated herein, CenturyTel urges the FCC to rescind Section 54.207(c)(3)(ii) of its rules and to immediately issue an order tolling the effective date of the Colorado Petition until the Joint Board has made its recommendation regarding the interplay between the level of disaggregation of support and changes in rural study area definitions. In the alternative, the FCC should decline on reconsideration to establish a new service area because the redefinition proposed by the Colorado PUC does not serve the public interest, or else the Commission should issue an order explaining why the Colorado Petition is consistent with the prior recommendations of the Joint Board.

Respectfully submitted,

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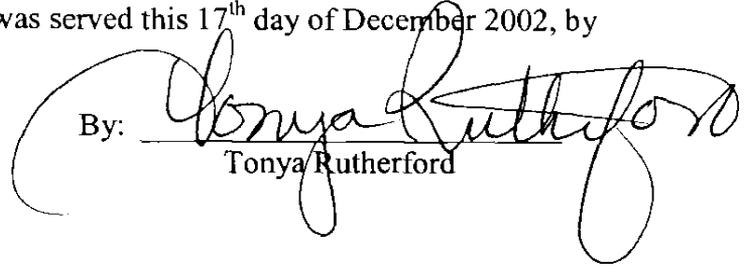
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Application for Review or, Alternatively, Petition for Reconsideration of CenturyTel of Eagle, Inc. was served this 17th day of December 2002, by U.S. Mail to the persons listed below.

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