



September 8, 2003

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CS Docket No. 02-52

Dear Ms. Dortch:

On July 17, 2003, the Coalition of Broadband Users and Innovators (“CBUI”) submitted a lengthy ex parte letter in the above-referenced proceedings. CBUI has for the past year been urging the Commission to adopt regulations to ensure that cable operators who offer high-speed Internet service provide unfettered access to Internet content, applications, and hardware. But despite their best efforts, CBUI’s members have been unable to come up with any evidence that cable operators are interfering, or intend to interfere, with such unfettered access.

To the contrary, the Chairman of CBUI’s lead member recently confirmed that, there is no evidence of any problem. Speaking at NCTA’s annual convention on June 9, 2003, Microsoft’s Chairman Bill Gates said, “I am really pleased with how the cable industry’s been providing openness on the cable modem platform There is a lot of openness being provided by that platform, so I think the cable industry’s to be congratulated for that.”¹

The National Cable & Telecommunications Association (“NCTA”) believes that, in the absence of any evidence of harm, CBUI’s proposed regulation is a solution in search of a problem. We think it is self-evident that regulation should not be imposed merely to prevent a hypothetical threat. There are large costs associated with adopting unnecessary regulation, and these costs are incurred by the regulators, by the regulated companies, and by consumers.

As we’ve explained, once regulations purporting to ensure “network neutrality” are in place, they will inevitably be used by their proponents and others to challenge a wide array of legitimate business practices as supposed impediments to unfettered access. Regulation will be used, as it often is, as a substitute for, or supplement to, marketplace negotiations in determining the manner in which content, applications and hardware are promoted and made available to consumers. This is why cable operators oppose such regulation even while providing assurances that they have no intention of interfering with their customers’ unfettered access to the Internet.

¹ Transcript of Remarks at Opening Session (emphasis added).

Now, having failed again to come up with any evidence that a problem exists, CBUI has set out to demonstrate that it is desirable and, in fact, commonplace for the Commission to impose prophylactic regulations to prevent merely hypothetical threats. Not surprisingly, none of the examples cited by CBUI support this proposition.

**There Is No Historical Basis for Imposing Prophylactic Regulation
in the Absence of any Demonstrable Harm or Abuse**

CBUI cites two examples of restrictions imposed on telephone companies to prevent them from using their local exchange monopoly to enter new businesses in an anticompetitive manner – the “Computer Inquiry” and “Video Dialtone” rules. In fact, both of these proceedings were efforts to expand the range of services that telephone companies could provide. Prophylactic rules were imposed along with that freedom not merely because the telephone companies had the ability to engage in bad behavior – or even because they might have had incentives to engage in such behavior. Restrictions were necessary because the telephone companies had been found, repeatedly, to have abused their monopoly power and engaged in anticompetitive conduct.

The Computer Inquiry rules were established as a way to free up telephone companies to engage in otherwise forbidden practices under the 1956 Consent Decree. They were designed as a way to avoid regulating the provision of competitive data processing services over telephone lines while maintaining longstanding regulatory oversight of telephone companies. The Commission allowed regulated local telephone companies to provide “enhanced services” on an unregulated basis, provided that they did so through separate subsidiaries and offered the transmission component of such services to other enhanced service providers on a regulated basis.

The Commission feared that if strict separation were not imposed, the providers of basic service would again engage in the sort of anticompetitive conduct that had given rise to the consent decree and would prevent the development of a competitive enhanced service market. In other words, the regulatory aspects of the Computer Inquiry rules were outgrowths of the longstanding restrictions and remedies adopted in response to demonstrated abuse.

Similarly, the video dialtone rules were an effort by the Commission to encourage the use of local telephone companies’ facilities to provide competitive multichannel video programming services at a time when local telephone companies were flatly prohibited by statute and by antitrust consent decrees from providing their own video programming directly to subscribers in their telephone service areas. The Commission allowed telephone companies to market to subscribers the opportunity to subscribe to a platform from which they could purchase video programming directly from an array of providers, using menus or guides offered by the telephone company. But to ensure that the telephone company was providing only the platform and the navigational tools for selecting and purchasing the programming of others, the Commission required that the platform be available on a nondiscriminatory basis to video programming providers. Again, the restrictions were based on established statutory and judicial

prohibitions that were imposed in light of a history of anticompetitive conduct and were a way to permit activity that would otherwise have been completely prohibited.

The cable program access rules, which CBUI also cites, similarly provide no precedent for its proposed regulation. As a threshold matter, contrary to CBUI's assertion, the program access rules were initially adopted in response to specific allegations of harm presented to Congress,² and they were directed at a far different set of circumstances than currently exists in the marketplace for Internet access services. When those rules were adopted, DBS was still on the drawing boards and a minuscule portion of subscribers to multichannel video programming services relied on providers other than the franchised cable operators in their communities. Moreover, more than half of the existing satellite-delivered cable networks were then owned by cable operators.

As the Commission has noted, Congress wanted to promote competition from DBS and other multichannel providers but, based on the testimony it had received, it "believed it unlikely that new market entrants could compete effectively unless they could gain access to vertically integrated, satellite delivered programming."³ Thus, Congress enacted provisions to ensure such access to programming even though there was no history of anticompetitive denial of programming in the past.

The "problem" that CBUI seeks to solve with its proposed regulation bears no relation to the situation that gave rise to program access. Cable operators are not withholding any product or service that websites or applications providers need in order to compete. To the contrary, consumers have access to a virtually unlimited array of Internet content, applications and hardware – almost none of which is owned by cable operators. And even though cable operators were first to offer high-speed Internet access to consumers, telephone companies and other providers of DSL service increasingly provide a head-to-head competitive alternative to cable and already serve 36% of the nation's high-speed access customers. In these circumstances, there is no reason to expect that cable operators could, much less would, eliminate the established competition that now exists in the marketplace for Internet content, applications and hardware.

**Cable Operators Do Not Have a History of Anticompetitive Abuse
– But Others in the Internet Marketplace Do**

Cable operators providing high-speed Internet access do not have the history of anticompetitive abuse that led to restrictions on telephone companies. Nor is regulation warranted in order to jump-start competition to cable operators in the provision of access to the

² See, e.g., S. Rep. No. 102-92, at 26 (1992) ("Small cable operators, satellite dish owners, and wireless cable operators complain they are denied access to . . . programming"); cf. CBUI Letter, p. 6.

³ *In re Implementation of the Cable Television Consumer Protection and Competition Act of 1992; Development of Competition and Diversity in Video Programming Distribution: Section 628(c)(5) of the Communications Act; Sunset of Exclusive Contract Prohibition*, 17 FCC Rcd 12124, 12127 (2002).

Internet. In fact, it is surprising that a Microsoft-led coalition would highlight these Commission precedents – because if anyone meets these criteria for regulation, it is Microsoft.

If speculative harm were the touchstone of government involvement, recent history suggests that regulatory activity should be focused on operating systems and other applications at the edge of the Internet to prevent unlawful tying arrangements and other anticompetitive practices by the dominant providers of those bottlenecks. After all, it's Microsoft, not cable operators, that, like the telephone companies, was found to have engaged in numerous anticompetitive practices in an antitrust suit brought by the Department of Justice. And while cable operators compete with telephone companies and other providers of access to the Internet, the means by which nearly all consumers of Internet access reach Internet content and applications is Microsoft's Internet Explorer.

Today, cable modem customers comprise only 22% of all Internet users. The large majority of Internet users still rely on dial-up narrowband access. And even among customers who subscribe to high-speed broadband Internet access, cable modem service faces vigorous competition from the telephone companies' DSL service. Approximately 64% of high-speed Internet customers purchase cable modem service, while 36% purchase DSL.

In contrast, more than 95% of all Internet users – dial-up and broadband – use Microsoft's Internet Explorer to access content and applications on the Internet.⁴ Yet CBUI's proposed rule purporting to guarantee “unfettered access to the Internet” would apply only to “broadband network operators,” and not to Internet browsers, portals or other gateways to the Internet. If regulation were deemed necessary to ensure unfettered access to the Internet, it would be odd, indeed, to impose such regulation on cable operators, who have no history of Internet abuse and face vigorous competition in the provision of Internet access, while leaving unregulated the provider of the Internet browser used by virtually all Internet customers, especially when that provider does have a history of anticompetitive abuse.

In fact, Microsoft and some of its fellow members of CBUI have in the past engaged in practices that would appear to have violated the principles of unfettered access to the Internet embodied in CBUI's proposed rule. For example, recent versions of Microsoft's Internet Explorer automatically redirect users to the MSN portal's search page whenever a user attempts to reach a web address that does not exist.

“Normally, when a Web surfer misspells an address or looks for an unregistered domain name, the Internet service provider will search for the appropriate server to deliver the page. If it can't find the server, an error page will be sent.”⁵ But Internet Explorer intercepts the standard ISP error message and “deliver[s] another page in its place” – specifically, the MSN search page,

⁴ See “IE's Domination of the Web Grows,” WinInfo, July 28, 2003, <http://www.wininformant.com/Articles/Index.cfm?ArticleID=39691>

⁵ “Microsoft Gives Error Pages New Direction,” CNET News.com, Sept. 5, 2001, <http://news.com.com/2100-1023-272578.html?legacy=cnet>

which identifies possible sites that the user may have meant to reach and “may also list ‘featured sites’ that search editors deem relevant to the mis-keyed term. The links can be chosen from MSN content partners and advertising partners. . . .”⁶

Does this use of Microsoft’s browser to steer users to Microsoft’s search page and portal violate the principles of network neutrality espoused by CBUI? It may benefit users by identifying the correct address that the user may have misspelled. But it also favors a content provider affiliated with Microsoft – *i.e.*, MSN – to the possible detriment of other search pages and Internet portals. As Andrew Jay Schwartzman, the President of one of CBUI’s own members, Media Access Project, has pointed out, this is part of a pattern of practices by Microsoft that threatens to diminish the availability of content on the Internet from a multiplicity of sources:

Schwartzman said that Microsoft has a history of creating default settings in its Windows operating system and Internet Explorer browser that point to Microsoft services and omit competing products. “Each of these individual, tiny insults may seem reasonably benign or trivial, but when you put them together they constitute a systematic effort to leverage their monopoly,” he said. “Standing alone it might not be such a terrible thing. But it’s not standing alone.”⁷

Yahoo has also taken steps to block users’ requests for particular content. For example, in an effort to discourage the posting of commercial messages (“spam”) on its multiple message boards, Yahoo adopted a policy of “blocking access to Web addresses advertised in spam messages.”⁸ On the one hand, this may have been a consumer-friendly move, as Yahoo suggested, to eliminate an annoyance to its users. On the other hand, some observers “suggested Yahoo’s motive [was] to hinder commercial rivals,” and, in fact, Yahoo acknowledged that “some of the Web sites . . . blocked from its finance section [were] competitors.”⁹

Whether the purposes and effects of Yahoo’s approach were benign or sinister, such an approach seems to be at odds with the general principles embodied by CBUI’s proposed rule. If a provider of cable modem (or DSL) service were to block access to web addresses advertised in spam messages sent to its Internet subscribers, advertisers or subscribers could, under CBUI’s rule, complain that the provider was “interfer[ing] with or impair[ing] subscribers’ ability to access lawful Internet content or services.”

If Yahoo and Microsoft believe that blocking or redirecting their users’ requests for content in these ways constitute legitimate efforts to make the Internet more user-friendly for

⁶ *Id.*

⁷ *Id.*

⁸ “Yahoo Curbs Message Post Spam,” CNET News.com, July 27, 1999, <http://news.com.com/2100-1023-229106.html?legacy=cnet> .

⁹ *Id.*

consumers, then why do they urge the Commission to support a rule that would arguably prohibit cable operators from providing their Internet subscribers with the same benefits? Alternatively, if such interference with access to content is so potentially troublesome as to warrant a prophylactic regulatory prohibition, why should such a supposedly “minimally intrusive”¹⁰ prohibition apply only to “broadband network operators” and not to the Internet browser and search engines used by most Internet users to access Internet content?

Former Restrictions on VPNs Do Not Justify Regulation Today

The reason why CBUI tries as hard as it does to make the case for regulating before there is any evidence of harm is that it has still been unable to come up with a single instance where a cable operator has blocked or interfered with its customers’ access to lawful Internet content. Instead, it continues to beat what is now a dead horse – namely, restrictions imposed in cable operators’ broadband subscriber agreements on the use of virtual private networks (“VPNs”). CBUI concedes that cable operators have removed those specific restrictions from their user agreements. But since it’s the only specific example of a supposedly prohibited application that they’ve ever been able to find, they are understandably reluctant to let it go.

CBUI contends that, because the reasons advanced by cable operators for the VPN restrictions were “questionable,” regulatory intervention by the Commission is necessary. In our reply comments in this proceeding, NCTA explained that one reason why VPNs were restricted was that “[t]o operate effectively, VPNs require a static IP address – i.e., an Internet address that remains the same every time the user boots up his or her computer and connects to the Internet. But, for a variety of technical reasons, cable operators generally assign dynamic IP addresses – i.e., addresses that change each time the user connects to the Internet – to residential subscribers.”¹¹

In a declaration attached to CBUI’s letter, Alan D. Weinberger of the ASCII Group, Inc. contends that “residential cable modem subscribers today are technically capable of using VPNs despite the fact that most, if not all, cable networks assign dynamic IP addresses to residential subscribers.”¹² Therefore, according to the declaration, “the argument that VPNs require a static IP address is simply false – VPNs are capable of functioning regardless of whether residential subscribers are assigned a dynamic or static IP address.”¹³

VPN providers may have developed techniques that now make it possible to circumvent the problems associated with dynamic IP addresses. But cable operators had good reason, at the time that they were introducing cable modem service, to believe that such problems were likely

¹⁰ CBUI Letter, p. 13.

¹¹ NCTA Reply Comments at 13.

¹² Weinberger Declaration, ¶ 10 (emphasis added).

¹³ *Id.* (emphasis in original).

to make the use of VPNs on their systems problematic. As one article that appeared in 2001 explained,

Corporate network managers prefer static IP addresses over dynamic ones because they make it easier to track and control what IP addresses are allowed to access the company network. Some virtual private networks (VPNs) require static IP addresses, which permit access only to authorized addresses. Yet DSL service providers in the past offered static IP addresses solely with business-tier services, which were priced out of reach for remote office workers and telecommuters.¹⁴

As that article pointed out, BellSouth, Sprint, Qwest and EarthLink all responded to this perceived problem by offering static IP addresses to residential users at an extra fee. One analyst reported that there was “a tremendous amount of demand for static IP”¹⁵ – so at least some users must have thought that static addresses were necessary to enable VPNs to work on broadband platforms.

EarthLink’s director of broadband projects also explained in that article that it was reasonable to impose an extra fee for static IP addresses, noting that “[p]rovisioning the account involves an administration cost.”¹⁶ He also pointed out that “[s]tatic IP users, whether they're telecommuters or people running online game servers, also tend to consume higher levels of bandwidth, which costs more to provide.”¹⁷

Even today, EarthLink’s on-line discussion of high-speed Internet service, “Welcome to High Speed Internet Access 101,” suggests that static IP addresses may be necessary for home use of VPNs. Thus, its glossary defines “Static IP Addressing” as follows:

When you access the Internet through a broadband connection, your Internet service provider automatically assigns you an Internet Protocol (IP) address so that you can send and receive data. Having a static IP means your IP address is the same every time you log on. Because a static IP address can be saved and recalled by users at remote locations, they’re popular with online gamers and people who work from home and need to access a corporate network.¹⁸

It was therefore not at all unreasonable, as CBUI suggests, for cable operators to assume, at the time that some included VPN restrictions in their user agreements, that VPNs required

¹⁴ “Static Electricity,” *Teledotcom*, Sept. 5, 2001, <http://www.teledotcom.com/article/TEL20010829S0015>

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ Earthlink, “Welcome to High-Speed Internet 101!: Glossary,” <http://www.earthlink.net/highspeed101/glossary/> (emphasis added).

static IP addresses. Perceptions as to technological needs can change. Today, according to the Weinberger Declaration, VPN technology no longer requires static IP addresses. And it is also the case that, today, cable operators no longer include such restrictions in their user agreements.

Fine Print in User Agreements Is No Basis for Regulation

High-speed Internet access and all its associated uses and capabilities are the product of new and continuously evolving technologies. It is understandable that ISPs and others involved in providing Internet services would want to be cautious and flexible and to protect themselves against possible future developments when crafting their formal user agreements (whether or not the terms of such agreements are rigidly enforced). Indeed, some of CBUI's members have user agreements in place that include restrictions on usage and conduct, which could, hypothetically, be enforced to prevent all sorts of conduct.

In particular, both Yahoo and Amazon.com broadly restrict commercial uses of their services without any indication that such uses will in any way interfere with the operation or harm other users. For example, SBC and Yahoo have combined forces to offer dial-up and DSL Internet service, and the SBC Yahoo "Terms of Service" consist of 15 pages of small print. One of the sentences buried in the terms provides that users "agree not to reproduce, duplicate, copy, sell, transfer, resell or exploit for any commercial purposes, your membership in the Service, any portion of the Service, use of the Service, or access to the Service."¹⁹ Does this mean that residential users may not use SBC Yahoo's Internet service for any business purposes? What's the justification for this restriction and what sorts of services are within its scope? VPNs?

Amazon.com similarly limits the use that consumers may make of its service. Its "Conditions of Use" grant users

a limited license to access and make personal use of this site. . . . This license does not include any . . . commercial use of this site or its contents; any collection and use of any product listings, descriptions or prices; any derivative use of this site or its contents; any downloading or copying of account information for the benefit of another merchant; or any use of data mining, robots, or similar data gathering and extraction tools. This site or any portion of this site may not be . . . visited, or otherwise exploited for any commercial purpose without express written consent of Amazon.com.²⁰

The site may not even be visited for any commercial purpose! Does this mean that a Barnes & Noble employee may visit the site to order books for him or herself, but not to check Amazon.com's prices on behalf of his or her employer?

¹⁹ SBC Yahoo Terms of Service, <http://sbc.yahoo.com/terms/> (emphasis added).

²⁰ Amazon.com Conditions of Use, <http://www.amazon.com/exec/obidos/tg/browse/-/508088/qid=1061999984/sr=1-3/002-5852844-5074451> (emphasis added).

In its very first submission to the Commission in this proceeding, CBUI asserted that “the myriad benefits of the Internet Age flow from one fundamental feature – the ability of consumers and businesses to communicate with one another and lawfully to create, share and access information, all without obstruction from network service providers.”²¹ Yet SBC Yahoo’s Terms of Service directly and pervasively authorize censorship of, and restrictions on, the content that its customers may communicate to others. For example, SBC Yahoo’s customers may not “upload, post, email, transmit or otherwise make available any Content . . . that is unlawful, harmful, threatening, abusive, harassing, tortious, defamatory, vulgar, obscene, libelous, invasive of another’s privacy, hateful, or racially, ethnically or otherwise objectionable.”²² SBC and Yahoo reserve the right “in their sole discretion to refuse or move any Content that is available via the Service. Without limiting the foregoing, SBC and Yahoo! will have the right to remove any Content that violates these [Terms of Service] or is otherwise objectionable.” So much for the unobstructed sharing of information that, according to CBUI, is the hallmark of “the Internet Age.”

All these terms and restrictions could hypothetically be used in arbitrary, pernicious or anticompetitive ways by Yahoo, SBC, Amazon.com – and the many other providers of Internet services whose terms of service and user agreements are loaded with such small print. But in the absence of any concrete examples that they actually have been used in such ways, their mere existence in user agreements hardly warrants imposing a prophylactic regulatory regime on developing Internet services, whether offered by cable operators or by CBUI’s members.

Regulation Is Not Necessary to Ensure the Availability and Facilitate the Use of Non-Harmful Internet Devices

Finally, CBUI argues that the Commission should regulate the attachment of equipment and devices to cable broadband networks by applying the Commission’s Carterfone principles. Again, as in the case of access to content, there is no evidence that any problem exists. There is no need or reason to extend a prophylactic Carterfone regulatory framework to all hardware used to access all conceivable services offered over the Internet – especially where there is no evidence that cable operators have refused attachment of any devices for reasons that would violate the principles of Carterfone.

Those principles include, of course, a recognition that network operators may prevent attachment of devices that may cause harm to the network or interfere with other customers’ use of the network. But there is no evidence of widespread refusal to permit attachment of devices even for these legitimate reasons. Indeed, over 300 different cable modems, independently developed and sold by nearly 70 unaffiliated vendors, are currently in use. The cable industry not only permits attachment of these products but has worked to facilitate their development and retail availability.

²¹ Ex Parte Letter, Nov. 18, 2002 (emphasis added).

²² SBC Yahoo Terms of Service, *supra* (emphasis added).

Instead, CBUI simply contends that cable operators have “required device manufacturers to go to great lengths to enable consumers to use their products on the network.”²³ But it was not unreasonable for Microsoft and cable operators to discuss network standards and the design of the X-Box device and service to ensure that the X-Box – a device that is neither provided by cable operators nor designed with cable industry input²⁴ – would work when connected to the cable network and that it would not cause harm to the network or interfere with use of the network by consumers.

It’s also not unreasonable that Microsoft and cable operators would engage in lengthy discussions to work out joint marketing arrangements, under which cable operators promoted the use of the X-Box service on their networks. In this regard, CBUI’s filing omits the most salient fact – that the four largest MSOs have reached such agreements with Microsoft.²⁵

CBUI provides no specific examples of any cable operator refusing, in the absence of a joint marketing agreement, to allow the attachment of Microsoft’s X-Box device, and there is no evidence that any have done so. In short, there is no evidence of any harm or abuse that warrants the imposition of a regulatory framework to ensure that developers of new devices and services are able to work with cable operators to ensure that such devices and services can work compatibly with broadband networks. The ability to threaten a regulatory complaint – even a frivolous complaint – might give Microsoft and other providers extra leverage in seeking to negotiate favorable joint marketing and promotional agreements for such devices and services. But they are wholly unnecessary and unwarranted to foster the open and competitive broadband environment that CBUI purports to favor.

* * * * *

When all is said and done, CBUI’s ceaseless campaign to impose regulation on a still-developing but well-functioning broadband Internet marketplace has yet to come up with any evidence of a problem that needs solving. Its contention that prophylactic regulation is the norm, even in the absence of demonstrated harm, is groundless. Its suggestion that terms and restrictions in user agreements might conceivably be used to restrict the openness of the Internet

²³ *Id.*

²⁴ CBUI’s suggestion that the Commission’s navigation device rules already extend *Carterfone* right-of-attachment principles to all devices used to access any service that might be provided by anyone over the Internet is simply wrong. The Commission has made clear that while Section 629 of the Communications Act and the Commission’s navigation device rules implementing that provision apply to “devices used by consumers to access multichannel video programming and other services offered over multichannel video programming systems,” the statute and rules were meant to extend only to devices used to access programming and services offered by the operator of the cable system or other multichannel video programming system. As the Commission explained, “the scope of Section 629 apparently was ‘narrowed to include only equipment used to access services provided by multichannel video programming distributors.’” *Gemstar International Group, Ltd. And Gemstar Development Corp.*, 16 FCC Rcd. 21,531, 21,542 (2001) (emphasis added), *citing* S. Conf. Rep. No. 104-230 at 181 (1996).

²⁵ *See, e.g.*, “Sachs: Cable-Modem Subs Go Everywhere,” *Multichannel News*, Feb. 25, 2003.

is belied by similar and more far-reaching restrictions in CBUI members own user agreements, and its contention that cable operators have imposed significant, unreasonable restrictions on access to content, applications and hardware has no basis.

The campaign has reached a dead end, and the Commission should reject CBUI's regulatory proposal.

Respectfully submitted,

/s/ Daniel L. Brenner
Daniel L. Brenner
Senior Vice President

/s/ Michael S. Schooler
Michael S. Schooler
Deputy General Counsel

cc: The Honorable Michael Powell
The Honorable Kathleen Abernathy
The Honorable Michael Copps
The Honorable Kevin Martin
The Honorable Jonathan Adelstein
Mr. Paul Gallant
Mr. Chris Libertelli
Mr. Jonathan Cody
Mr. Matthew Brill
Ms. Stacy Robinson
Mr. Jordan Goldstein
Ms. Jessica Rosenworcel
Mr. Dan Gonzalez
Ms. Catherine Bohigian
Ms. Johanna Mikes
Mr. Kenneth Ferree
Ms. Barbara Esbin
Mr. Kyle Dixon
Ms. Marjorie Greene
Ms. Mary Beth Murphy
Mr. John Norton
Mr. William Maher
Ms. Michelle Carey
Mr. Thomas Navin
Mr. Brent Olson
Ms. Carol Matthey
Mr. Scott Mergmann
Mr. John Rogovin
Mr. Harry Wingo
Dr. Robert Pepper
Mr. Simon Wilkie
Ms. Jane Mago
Ms. Maureen McLaughlin
Ms. Scott Marcus