

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Petition for Forbearance Under	)	WC Docket No. 05-170
47 U.S.C. § 160© from Application of	)	
Unbundling Rules that Limit Competitive	)	
Alternatives	)	

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**OPPOSITION OF SBC COMMUNICATIONS INC**

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**OPPOSITION OF SBC COMMUNICATIONS INC.<sup>1</sup>**

**1. Introduction and Summary.**

In the *Triennial Review Remand Order*<sup>2</sup> (*TRRO*), the Commission required ILECs to continue to unbundle high capacity loop and transport facilities, such as DS1 loops and transport, in all but a handful of wire centers with extraordinary levels of existing facilities based competition. For example, the Commission required ILECs to unbundle DS1 loops, which represent the vast majority of the high capacity facilities ordered by CLECs as UNEs, unless there are *both* four or more fiber-based collocators *and* at least 60,000 business lines in a wire center. *See TRRO* para. 146. Under this test, ILECs will be required to unbundle DS1 loops in all but 0.5% of their wire centers, which (on average) serve 91,000 business lines and in which an average of 13 facilities-based

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<sup>1</sup> SBC Communications Inc. submits this opposition on behalf of itself and its operating company affiliates (collectively, "SBC"). Those affiliates are Southwestern Bell Telephone, L.P.; Nevada Bell Telephone Company; Pacific Bell Telephone Company; Illinois Bell Telephone Company; Indiana Bell Telephone Company, Inc.; Michigan Bell Telephone Company; The Ohio Bell Telephone Company; Wisconsin Bell, Inc.; and The Southern New England Telephone Company.

<sup>2</sup> *Unbundled Access to Network Elements; Review of the Section 271 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313 & CC Docket No. 01-338, *Order on Remand*, 20 FCC Rcd 2533 (2004) (*TRRO*), *appeal docketed*, No. 05-1095 and consolidated cases (D.C. Cir. March 23, 2005).

competitors have collocated competitive fiber facilities.<sup>3</sup> In SBC's 13-state territory, only 28 wire centers – out of almost 3,200 wire centers – meet the non-impairment threshold for DS1s, and seven of the states in SBC's region have *no* wire centers that meet that threshold.<sup>4</sup> The Commission thus required ILECs to unbundle DS1 loops virtually ubiquitously, except in the infinitesimal number of wire centers with the highest line densities and most extreme levels of competition.

But even these extensive unbundling requirements are not sufficient to satisfy the CLECs. On March 28, a group of CLECs (all but one of whom were members of the “Loop and Transport Coalition,” which urged the Commission to make a national finding of impairment for DS1, DS3 and dark fiber loops and to require ubiquitous unbundling of DS1 loops and transport, and EELs nationwide) filed a petition for reconsideration of the new loop unbundling rules, seeking to undo the limited relief from unbundling for DS1s and other high capacity facilities adopted in the *TRRO*.<sup>5</sup> Among other things, they asked the Commission to eliminate the cap on DS1 dedicated transport generally and for DS1 loop/transport combinations (*i.e.*, EELs) specifically, and to eliminate the EELs eligibility criteria altogether.<sup>6</sup> In support, the CLEC Coalition simply rehashed their arguments in the Commission's prior rulemaking for nationwide unbundling of DS1 loop and transport facilities and eliminating the EELs eligibility criteria. As SBC showed in its opposition

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<sup>3</sup> *TRRO* at para. 180.

<sup>4</sup> Letter of James C. Smith, Senior Vice President, SBC, to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed February 18, 2005).

<sup>5</sup> Petition for Reconsideration of Birch Telecom, *et al.*, WC Docket 04-313 (filed March 28, 2005) (*CLEC Coalition PFR*).

<sup>6</sup> *CLEC Coalition PFR* at 2-10.

to that petition, those arguments are meritless and were properly rejected by the Commission in the *TRRO*.<sup>7</sup>

Evidently recognizing that their recycled arguments did not provide grounds for reconsideration, the CLEC Coalition now seeks to attain the same end through the petition for forbearance that is the subject of this proceeding.<sup>8</sup> As in their petition for reconsideration, the CLEC Coalition ask the Commission to require ILECs to ubiquitously unbundle DS1 dedicated transport and EELs without limitation, as well as to require ILECs to unbundle DS1 loops serving “predominantly residential” and “small office” buildings nationwide.<sup>9</sup> But this time, the CLEC Coalition seeks to impose these requirements by asking the Commission to “forbear” from applying (1) the wire center-based test for DS1 loop impairment to “predominantly residential” and “small office” buildings; (2) the DS1 dedicated transport cap on the use of DS1/DS1 EELs; and (3) the EELs eligibility criteria.<sup>10</sup> The CLEC Coalition thus ask the Commission to re-impose on ILECs the obligation to unbundle the loop and transport facilities at issue by “forbearing” from Commission rules that eliminated those obligations based on a finding that CLECs were not impaired without unbundled access to those facilities.

The CLEC Coalition’s petition makes a mockery of the statutory forbearance tool. Rather than seeking to eliminate unnecessary or outdated regulatory burdens on carriers,

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<sup>7</sup> Response of SBC Communications Inc. to Petitions for Clarification and/or Reconsideration, WC Docket No. 04-313 (filed June 6, 2005); Reply of SBC Communications Inc. to Oppositions to Petition for Reconsideration of Iowa Telecommunications Services, Inc. (filed June 20, 2005).

<sup>8</sup> Petition for Forbearance of XO Communications, Inc., *et al.*, WC Docket No. 05-170 (filed March 28, 2005) (*CLEC Coalition Petition*).

<sup>9</sup> *Id.* at 1.

<sup>10</sup> *Id.*

as Congress intended, the CLEC Coalition seeks to use forbearance to *impose* unbundling obligations on ILECs that the Commission found were unnecessary and inconsistent with the statutory unbundling criteria in an unbundling decision released less than seven months ago. The CLEC Coalition's petition thus is flatly inconsistent with the deregulatory goals of the Act in general and section 10 in particular. The petition also ignores the Supreme Court's holding that unbundling obligations require an affirmative finding of impairment. Consequently, even if the Commission did forbear from its no-impairment finding, as the petition asks, such forbearance would not give rise to the unbundling that petitioners seek. Their petition is thus essentially pointless.

Beyond that, the petition is additionally defective insofar as it asks the Commission to create brand new rules under the guise of forbearance. Forbearance is an eraser not a pencil. Even recognizing that the Commission may condition its grant of forbearance authority under certain circumstances, the Commission does not have *carte blanche* to use its forbearance authority to create a brand new set of rules and obligations. That requires a rulemaking.

Even apart from all of these flaws, the CLEC Coalition fails to show, in any event, that the forbearance it seeks comes close to satisfying the statutory forbearance criteria. Accordingly, the Commission must deny its petition.

**2. The CLEC Petition Should be Dismissed Out of Hand Because it is Inconsistent with the Deregulatory Purposes of Section 10, Procedurally Defective, and, in Any Event, Would Not Provide the Relief They Seek.**

As the Commission previously has recognized, through the 1996 Act, Congress sought to establish a procompetitive, deregulatory national policy framework designed to shift

telecommunications markets from regulation to competition as quickly as possible.<sup>11</sup> Integral to achieving this goal, section 10 of the Act authorizes the Commission to forbear from applying any regulation or requirement of the Act, and thus to reduce or eliminate regulatory burdens on carriers, where the Commission determines that such regulatory requirements are unnecessary or that relaxed regulation is in the public interest.<sup>12</sup> The purpose of section 10 thus is to reduce regulatory burdens on carriers.

The CLEC Coalition's petition would turn section 10 on its head. Rather than reducing regulatory burdens on carriers, the CLEC Coalition's forbearance request would impose additional regulatory burdens on ILECs that the Commission rightly eliminated as inconsistent with the unbundling requirements of the Act and the public interest in a decision released less than seven months ago.<sup>13</sup> Granting the CLEC Coalition's petition would be inconsistent with the deregulatory purpose of the forbearance tool, and thus an improper exercise of the Commission's forbearance authority.

Moreover, even accepting *arguendo* that the Commission may establish certain conditions on a grant of forbearance authority, section 10 clearly does not supplant the rulemaking provisions of the Administrative Procedure Act with respect to the establishment of new regulatory requirements. Yet that is precisely what the CLEC

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<sup>11</sup> *Policy and Rules Concerning the Interstate, Interexchange Marketplace*, CC Docket No. 96-61, *Notice of Proposed Rulemaking*, 11 FCC Rcd 7141 at para. 1 (1996); see also Communications Act of 1995, H.R. Rep. No. 204, 104<sup>th</sup> Cong. 1<sup>st</sup> Session, at 89 (1995) (*House Report*).

<sup>12</sup> *House Report* at 89; Telecommunications Competition and Deregulation Act of 1995, S. Rep. No. 23, 104<sup>th</sup> Cong. 1<sup>st</sup> Session at 5 (1985) (*Senate Report*); see also *Petition of SBC Communications Inc. for Forbearance from the Application of Title II Common Carrier Regulation to IP Platform Services*, WC Docket No. 04-29, *Memorandum Opinion and Order*, 20 FCC Rcd 9361, para. 12 (2005) (*IP Forbearance Order*) "Section 10, as we have stated, constitutes 'an important tool to realize this [deregulatory] goal.'"

<sup>13</sup> Indeed, the Commission's decision to eliminate the unbundling obligations the CLEC Coalition seeks to reimpose has not yet been fully implemented.

Coalition seeks. Rather than asking the Commission simply to forbear from applying a regulatory provision, it seeks a brand new set of rules. For example, it proposes that, for purposes of granting the forbearance it seeks, the Commission define “predominantly residential” buildings in the same way it defined that term for fiber-to-the-home loops, and define any building with less than four DS3s of total activated ILEC capacity as a “small office” building.<sup>14</sup> Thus, its petition plainly exceeds the bounds of section 10. .

In any event, granting the CLEC Coalition’s petition will not provide CLECs the relief they seek. Their petition is premised on the notion that ILECs are subject to an overarching obligation to unbundle their networks, subject only to isolated exemptions granted by the Commission, and that granting the forbearance they seek will result in a “springing executory” obligation on ILECs to unbundle. But, as the Supreme Court long ago made clear, an ILEC has no obligation to unbundle its network until or unless the Commission makes a proper impairment finding and adopts a rule requiring the ILEC to unbundle.<sup>15</sup> Simply eliminating the rules that are the subject of the CLEC Coalition’s petition thus would leave a vacuum – it would not require ILECs to unbundle the facilities at issue. That would require a rulemaking to adopt new rules imposing the unbundling requirements the CLEC Coalition seeks. The Commission therefore should dismiss the CLEC Coalition petition out of hand.

### **3. The CLEC Coalition Petition Does Not Meet the Statutory Forbearance Criteria.**

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<sup>14</sup> *Id.* at 18.

<sup>15</sup> *AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366, 391-92 (1999) (“Section 251(d)(2) does not authorize the Commission to create isolated exemptions from some underlying duty to make all network elements available, it requires the Commission to determine on a rational basis *which* network elements must be made available . . .”).

Even if the Commission were to consider the CLEC Coalition petition on the merits, it must reject the petition because it fails to satisfy the statutory forbearance criteria. Section 10 of the Act authorizes the Commission to forbear from any regulation or provision of the Act if it determines:

- (1) enforcement of such regulation . . . is not necessary to ensure that the charges . . . by . . . that telecommunications carrier . . . are just and reasonable and are not unjustly or unreasonably discriminatory;
- (2) enforcement of such regulation . . . is not necessary for the protection of consumers; and
- (3) forbearance from applying such . . . regulation is not consistent with the public interest.

47 U.S.C. § 160(a). Congress further directed the Commission, in evaluating whether forbearance is in the public interest, to consider whether “forbearance will enhance competition among providers of telecommunications services.” 47 U.S.C. § 160(b). Thus, before the Commission may forbear from enforcing or applying any regulation, it first must find that all three prongs of section 10 are satisfied.<sup>16</sup> And it may not find that forbearance is in the public interest if elimination of a regulation will undermine competition.

In its opposition to the CLEC Coalition’s March 28 petition for reconsideration, SBC refuted the CLEC Coalitions’ claims (repeated in their forbearance petition) that the Commission should eliminate the DS1 dedicated transport cap for DS1/DS1 EELs, and the EELs eligibility criteria.<sup>17</sup> SBC will not reiterate the arguments it made in that

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<sup>16</sup> *Cellular Telecomms. & Internet Ass’n v. FCC*, 330 F.2d 502, 509 (D.C. Cir. 2003).

<sup>17</sup> Response of SBC Communications Inc. to Petitions for Clarification and/or Reconsideration, WC Docket No. 04-313 (filed June 6, 2005).

opposition here. Suffice it to say, however, insofar as the CLEC Coalition failed to show that reconsideration of those rules is appropriate or consistent with the requirements of the statute, they also have failed to show that forbearance from applying the DS1 dedicated transport cap for DS1/DS1 EELs and the EELs eligibility criteria is consistent with the public interest, or that eliminating those rules would better promote facilities-based competition (and thus better protect consumers) than continuing to enforce those rules. Consequently, their request for forbearance from applying those rules should be rejected.

Likewise, the Commission should reject the CLEC Coalition's request that it forbear from applying its wire center-based test for DS1 loop impairment to predominantly residential and small office buildings served by Tier 1 central offices. The CLEC Coalition argues that the Commission's wire center-based test for DS1 loops is overly broad because it fails to account for the characteristics of specific buildings served by those wire centers, and thus denies CLECs access to DS1 loops to many buildings where CLECs are unlikely to deploy facilities.<sup>18</sup> In particular, they claim that CLECs cannot economically deploy loops to a building unless customer demand at that location is equivalent to at least three DS3s worth of traffic, and that application of the Commission's wire center-based test for DS1s will harm competition and consumers by preventing CLECs from competing to serve customers in small buildings.<sup>19</sup>

The Commission already considered and rejected these arguments in adopting its wire center-based DS1 loop impairment test, and should do so again here. As an initial

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<sup>18</sup> *CLEC Coalition Petition* at 3.

<sup>19</sup> *Id.* at 3, 7.

matter, the Commission found that CLECs are not impaired in their ability to deploy loops to any building with *two* DS3s of demand, not *three* DS3s of demand, and the CLEC Coalition provides no basis for revisiting that holding, particularly in a forbearance petition. Beyond that, the Commission rejected claims by the CLEC Coalition and others that it should adopt a national finding of impairment for DS1 loop facilities, and require ubiquitous unbundling of DS1s nationwide, on the ground that CLECs cannot economically deploy standalone DS1 loops.<sup>20</sup> The Commission likewise rejected CLEC claims that it should adopt a building-by-building approach to evaluating impairment for high capacity loops, as the CLEC Coalition now advocates.<sup>21</sup> The Commission found that both these approaches were inconsistent with the requirements of section 251 and the D.C. Circuit's decision: (1) it found the former approach overly broad in light of evidence clearly showing that CLECs have been able to provide service at the DS1 capacity using higher-capacity facilities;<sup>22</sup> and (2) it concluded the latter would be both administratively unworkable and inconsistent with the D.C. Circuit's decision that section 251 requires the Commission to draw reasonable inferences about the feasibility of potential competition from actual deployment.<sup>23</sup>

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<sup>20</sup> *TRRO* at para. 165.

<sup>21</sup> *Id.* at paras. 155-65.

<sup>22</sup> *Id.* at para. 165.

<sup>23</sup> *Id.* at paras. 157-59 (concluding that a building-specific approach would be impracticable and administratively unworkable because it would require collection and analysis by the Commission of vast quantities of data, which, in any event, are not easily verifiable and are exclusively in the possession of CLECs, which have little incentive to provide the information to regulators); and paras. 160-61 (noting that, even if the Commission could solve the administrability problems with a building-specific approach, that approach still would be flawed because it fails to draw reasonable inferences regarding potential deployment).

The Commission acknowledged that a wire center-based approach may not be perfect, but concluded that such an approach was “most likely to reveal, in an administrable manner, which areas are likely to . . . permit the construction of competitive high-capacity loops,” and thus “best minimize and balance any under-inclusiveness and over-inclusiveness” inherent in making any unbundling determination.<sup>24</sup> The Commission further acknowledged that CLECs typically do not construct stand-alone DS1 loops to serve customers at the DS1 capacity level,<sup>25</sup> but rightly concluded that the relevant issue in evaluating impairment is not whether a CLEC can self-deploy a particular facility, but whether competition is possible in the provision of a service without unbundled access to ILEC facilities.<sup>26</sup> In this regard, the Commission found that, where CLECs have deployed high-capacity fiber, they can channelize those facilities to offer lower-capacity services, and thus provide competitive DS1 services.<sup>27</sup> And it concluded that, in wire centers meeting the non-impairment thresholds it adopted for DS1s, CLECs were very likely to have already widely deployed high capacity fiber loops that could be channelized, or could construct very short laterals to reach new customers, and thus could pervasively provision DS1 capacity services.<sup>28</sup> The CLEC Coalition objects that these findings are irrelevant because CLECs cannot economically deploy fiber loops to smaller buildings with limited demand for telecommunications services, such as predominantly residential buildings and small

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<sup>24</sup> *Id.* at para. 169.

<sup>25</sup> *Id.* at paras. 150, 170.

<sup>26</sup> *See id.* at paras. 170-73.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at paras. 172, 178.

office buildings, and thus have no facilities serving those locations to channelize down to provide DS1 services. But this claim is entirely beside the point. As the Commission aptly observed, the non-impairment criteria for DS1 and DS3 loops establish administrative proxies that indicate when a particular building is likely to fall within a central business district, where the majority of buildings are likely to be multi-tenant office or residential buildings with sufficient demand for telecommunications services to economically justify deployment of competitive fiber that can be channelized to provide a variety of high capacity services – including DS1 services.<sup>29</sup> And even in the relatively few cases in those districts where “competitive deployment of high-capacity loops is not feasible, CLECs still may serve specific buildings using tariffed incumbent LEC offerings.”<sup>30</sup> Moreover, residential and small businesses are precisely the types of customers that initially have been targeted by intermodal providers of high capacity services, such as cable companies and fixed wireless providers.<sup>31</sup> The Commission thus

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<sup>29</sup> *Id.* at para. 167. *See also id.* at para 154 (citing Loop and Transport Coalition Comments).

<sup>30</sup> *Id.* at paras. 180; 163 (“[I]n urban wire centers where high-capacity loop unbundling is not required competing carriers will be able to use their own facilities, or facilities deployed by other competitors, potentially complemented, as a gap-filler, by services using an incumbent LEC’s tariffed alternatives for buildings where competitive facilities cannot be economically be deployed;” noting, further, that “in some cases, competitive LECs might be able to serve customers’ needs by combining other elements [such as DSL-capable loops] that remain available as UNEs”).

<sup>31</sup> *Id.* at para. 193 (noting that cable providers are focusing their marketing strategies on residential users and small and medium businesses). In the *Triennial Review Remand Order*, the Commission stated that the record suggested that, where cable companies offer service to business customers, they provide cable modem services, which CLEC commenters asserted were imperfect substitutes for service provided over DS1 loops. *Id.* SBC vigorously disputed these CLECs claims, but regardless whether there was any merit to the CLECs’ claims when they were made, as SBC showed in its comments in the special access proceeding, cable companies and other intermodal competitors (such as fixed wireless providers) now pose an ever-increasing competitive alternative to ILEC high capacity services – including DS1 services. Comments of SBC Communications Inc., WC Docket No. 05-25, at 16-20 (filed June 13, 2005) (noting, for example, that Cox Communications now offers special access services at bandwidths of DS1 to OC192, and Comcast is targeting the small and medium businesses that are the heart of the BOCs’ DS1 and DS3 customer base). *See also* Bernstein Research Call, Comcast (CMCSA): Margins Continue to Expand; VoIP to Reach 8.0M Homes Passed in “Next Sixty Days,” at 10 (Apr. 29, 2005) (noting that, with “as

already has considered the CLEC Coalition's claims, and rightly determined that CLECs are not impaired in their ability to provide DS1 services in the very few wire centers that meet the Commission's DS1 non-impairment criteria – even with respect to the even fewer number of customers in residential and small office buildings in those wire centers that purchase such services.<sup>32</sup>

Insofar as CLECs are not impaired without unbundled access to DS1s to serve any customers in Tier 1 wire centers, as the Commission correctly found in the *Triennial Review Remand Order*, the Commission cannot reasonably conclude that CLEC Coalition's request for forbearance meets the statutory forbearance criteria. In particular, the Commission could not reasonably find that the application of the non-impairment criterion for DS1s is not necessary to protect consumers, or that forbearance is consistent with the public interest. As the Commission and courts repeatedly have found, unbundling in the absence of impairment undermines genuine facilities-based competition, and imposes significant costs – including disincentives to invest by CLECs and ILECs alike, and tangled management of shared facilities – that outweigh any conceivable benefits from unbundling.<sup>33</sup> Failure to apply the non-impairment criterion for DS1s in Tier 1 wire centers thus would harm consumers by imposing the costs of

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many as 5.2M businesses in Comcast's footprint, with nearly 80% within 200 feet of Comcast's HFC infrastructure," Comcast has a very profitable business opportunity in the T1 market).

<sup>32</sup> Indeed, if any thing, the Commission's non-impairment test for DS1s significantly understates the number of wire centers in which CLECs are not impaired without unbundled access to ILEC DS1 loops.

<sup>33</sup> See *Triennial Review Remand Order* at para.2; *AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366, 387-92; *USTA v. FCC*, 290 F.3d 415, 427 (D.C. Cir. 2002) (*USTA I*), cert. denied, 538 U.S. 940 (2003); (“[N]othing in the Act appears a license to the Commission to inflict on the economy the . . . costs [of unbundling] under conditions where it had no reason to think doing so would bring on a significant enhancement of competition.”); *United States Telecom Ass’n v. FCC*, 359 F.3d 554, 563 (D.C. Cir. 2004) (*USTA II*), cert. denied 125 S.Ct. 313, 316, 345, (2004).

unbundling without corresponding benefits. Likewise, forbearance from applying that criterion, as the CLEC Coalition petition requests, would undermine competition for DS1 services, and therefore not be consistent with the public interest. The CLEC Coalition's request for forbearance thus fails to meet the statutory forbearance criteria.

**Conclusion**

For the foregoing reasons, the CLEC Coalition's petition for forbearance should promptly be denied.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

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