

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Rules and Regulations Implementing the)	
Telephone Consumer Protection Act of 1991)	CG Docket No. 02-278
)	

**ACA INTERNATIONAL'S COMMENT IN OPPOSITION
TO THE PETITION OF PAUL D.S. EDWARDS FOR
EXPEDITED CLARIFICATION AND DECLARATORY
RULING CONCERNING THE TELEPHONE CONSUMER
PROTECTION ACT**

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I. Introduction.

The following comment is submitted on behalf of ACA International (“ACA”) in response to the Federal Communications Commission’s request for comments regarding Paul D.S. Edwards’ Petition¹ for an expedited clarification and declaratory ruling under the Telephone Consumer Protection Act (“TCPA”)² and the Commission’s implementing regulations.

The Petition asks the Commission to clarify whether autodialed or prerecorded message calls may be placed to a telephone number provided by a consumer in the limited context of porting numbers from a landline service to a wireless service. Mr. Edwards asserts that the Commission’s declaratory ruling issued in response to a petition by ACA permits debt collection calls to a wireless telephone number only when the consumer has given a second or renewed prior express consent to be called at the particular wireless telephone number after ported by the consumer.³ This assertion presumes that porting a landline number to a wireless service revokes the prior express consent given by the consumer. Simply stated, Mr. Edwards asks the Commission to incorrectly conclude that the TCPA requires that the consumer provide a telephone number assigned to a specific wireless device in order for autodialed or prerecorded message calls to the wireless telephone number to be permissible.⁴ Ultimately, the

¹ Petition for Expedited Clarification, filed by Paul D.S. Edwards, January 12, 2009.

² Telephone Consumer Protection Act of 1991, Pub. L. No. 102-243, 105 Stat. 2394 (1991), *codified at* 47 U.S.C. § 227.

³ Petition at 2.

⁴ Petition at 2.

Petition not only is inconsistent with the TCPA and the Declaratory Ruling issued by the Commission to ACA on January 4, 2008,⁵ but it amounts to little more than a thinly veiled attempt to misuse the TCPA for litigation gain.⁶

⁵ *Request of ACA International for Clarification and Declaratory Ruling*, CG Docket No. 02-278, Declaratory Ruling, 23 FCC Rcd 559 (2008) (hereinafter “Declaratory Ruling”).

⁶ Mr. Edwards is a serial plaintiff. Based on public records, he has filed at least 45 different cases involving the FDCPA, FCRA and other credit and collection laws. *See, e.g., Edwards v. Commercial Industries Service Co. Inc., et al.*, 2006 WL 4540854 (D. Nev. 2006); *Edwards v. Diversified Credit Services, Inc.*, 2003 WL 24262972 (D. Nev. 2003); *Edwards v. Phillips & Cohen Assoc.*, 2005 WL 4050178 (D. Nev. 2005) (Dismissed pursuant to Fed. R. Civ. P., Rule 41(b)); *Edwards v. Collecto, Inc.*, 2005 WL 3766844 (D. Nev. 2005) (Stipulation that action is dismissed with prejudice); *Edwards v. FMA Alliance LTD*, 2003 WL 24263052 (D. Nev. 2003) (Defendant’s motion for summary judgment granted); *Edwards v. OSI Portfolio Services, Inc.*, 2004 WL 3694447 (D. Nev. 2004) (Defendant’s motion for summary judgment granted); *Edwards v. FMA Alliance LTD*, 2003 WL 24263052 (D. Nev. 2003) (Defendant’s motion for summary judgment granted); *Edwards v. Viking Collection Service Southwest, Inc.*, 2003 WL 24262680 (D. Nev. 2003) (Stipulation that action is dismissed with prejudice); *Edwards v. Transworld Systems, Inc.*, 2001 WL 34881168 (D. Nev. 2001) (Stipulation that action is dismissed with prejudice); *Edwards v. Osteopathic Med. Assocs. of Nev.*, 2005 WL 2031243 (Nev. Dist. Ct. 2005).

Mr. Edwards recently filed a slander case against Judge Kent J. Dawson. *Edwards v. Dawson*, 2007 WL 4639896 (D. Nev. 2007). Judge Dawson presided over *Edwards v. OSI Portfolio Services, Inc.*, 2004 WL 3694447 (D. Nev. 2004). In his Amended Order dismissing the case, Judge Dawson stated that Mr. Edwards’ behavior had the appearance of criminal fraud that perhaps should be forwarded to the U.S. Attorney’s Office for prosecution. The presiding judge included the following in the Order Granting Defendant’s Motion to Dismiss.

This case is brought by an extremely litigious person with a history of filing numerous lawsuits, including 45 previous cases filed pursuant to the Fair Credit Reporting Act and the Equal Credit Opportunity Act. An additional 20 claims were settled by the putative defendants prior to the filing of suit. Mr. Edwards admitted in his deposition in one of these prior cases that he has made a living since 1996 by settling claims made in demand letters and suing debt collection companies under these Acts.

For the reasons set forth herein, ACA respectfully submits that the Petition should be rejected. The TCPA does not require that prior express consent be associated with a phone number of a particular wireless device. Indeed, a contrary interpretation would pose entirely unnecessary burdens on consumers to confer their prior express consent multiple times in porting contexts. As discussed herein, ACA respectfully asks that the Commission clarify that a consumer who gives prior express consent to be called at a telephone number for the specific purpose of debt recovery carries forward such consent when they voluntarily port the number permanently to a wireless device (or temporarily as in call-forwarding situations), unless the consumer expressly revokes his or her consent.

II. Background on ACA International.

ACA International is an international trade association originally formed in 1939 and composed of credit and collection companies that provide a wide variety of accounts receivable management services. Headquartered in Minneapolis, Minnesota, ACA represents approximately 5,500 company members, including credit grantors, collection agencies, attorneys, asset buyers and vendor affiliates.

The company-members of ACA comply with applicable federal and state laws and regulations regarding debt collection, as well as ethical standards and guidelines established by ACA. Specifically, the collection activities of ACA members is regulated primarily by the Federal Trade Commission under the Federal Trade Commission Act, 15 U.S.C. § 45 *et seq.*, the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692

Edwards v. Dawson, 2007 WL 4639896 (D. Nev. 2007) (Case Number: 2:07CV01201) (Order Granting Motion to Dismiss).

et seq.; the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (as amended by the Fair and Accurate Credit Transactions Act); the Gramm-Leach-Bliley Act, 15 U.S.C. § 6801 *et seq.*; in addition to numerous other federal and state laws. Indeed, the accounts receivable management industry is unique if only because it is one of the few industries in which Congress enacted a specific statute governing all manner of communications with consumers when recovering payments.⁷ In so doing, Congress committed the regulation of the recovery of debts to the jurisdiction of the Federal Trade Commission. 15 U.S.C. § 16921.

ACA members range in size from small businesses with a few employees to large, publicly held corporations. Together, ACA members employ in excess of 150,000 workers. These members include the very smallest of businesses that operate within a limited geographic range of a single town, city or state, and the very largest of national corporations doing business in every state. The majority of ACA members, however, are small businesses. Approximately 2,000 of the company members maintain fewer than ten employees, and more than 2,500 of the members employ fewer than twenty persons.

One commonality in the diverse membership of ACA is the use of autodialers. This technology is used to contact consumers (i.e., the customers of creditor grantors) by telephone. Telephone calls are the most efficient way to contact customers, and many customers today use cell phones as their primary, exclusive, and preferred method of communicating.

⁷ The FDCPA defines “communications” subject to statute broadly to include “the conveying of information regarding a debt directly or indirectly to any person through any medium.” 15 U.S.C. § 1692a(2)

When contacting customers, ACA members use autodialers for *non-telemarketing reasons*. The purpose of these telephone communications is to recover payment for obligations owed to creditors. Many of these communications are initiated using autodialers to dial specific telephone numbers. The calls are not random or sequential. They are limited to customers of creditors who have received a service or product without payment. Typically the telephone number is provided by the customer for purposes of receiving calls, for example, as part of a credit application. Moreover, the calls do not involve advertising or soliciting the sale of products or services. Instead, they are placed to complete a transaction in which a customer has received a product, service, loan or other thing of value without paying for it. This fact among others distinguishes the communications of ACA members from those of telemarketers subject to the TCPA, and the Commission has recognized as much.

Autodialers are more than a tool of efficiency. The technology confers unique benefits to consumers and creditors in the context of the non-telemarketing calls placed by ACA members. For example, autodialers are precise. They maximize customers' privacy about sensitive financial information by eliminating dialing errors that risk inadvertent contacts with third parties not responsible for the account. Federal and state laws specifically prohibit such third party disclosures. Autodialers also are programmed to restrict calls to designated area codes within the calling times prescribed by federal and state laws. Further, as the Commission previously has stated, the technology allows for a reliable way for consumers to learn about their accounts and arrange for payment.⁸

⁸ Notice of Proposed Rulemaking in the Matter of the Telephone Consumer Protection Act of 1991, 7 FCC Rcd 2736, para. 15 (rel. April 17, 1992) (“The use of

Consequently, autodialers are an important tool that creditors use to control the cost of credit for all consumers, and to keep consumers informed and avoid unnecessary delinquencies and defaulted accounts.

In a broader sense, ACA members use autodialers as a crucial component in safeguarding the health of the economy. Uncollected consumer debt threatens America's economy. According to the Federal Reserve Board and United States Census Bureau, total consumer bad debt costs every adult in the United States \$683 every year. This translates into a cost for the average non-supervisory worker of nearly 54 hours (before taxes) in annual salary that pays for the bad debt of other consumers. By itself, outstanding credit card debt has doubled in the past decade and now approaches three quarters of one trillion dollars. Total consumer debt, including home mortgages, exceeds \$9 trillion.⁹ Moreover, the greatest increases in consumer debt are traced to consumers with the least amount of disposable income to repay their obligations.

As part of the process of attempting to recover outstanding payments, ACA members are an extension of every community's businesses. They represent the local hardware store, the retailer down the street, and your family doctor. ACA members work with these businesses, large and small, to obtain payment for the goods and services received by consumers. In years past, the combined effort of ACA members have resulted in the recovery of billions of dollars annually that are returned to business and

autodialers in debt collection increases efficiency of the collector who no longer has to deal with unanswered calls, and is beneficial to the called party by making them aware of the company's inquiry").

⁹ William Branigan, *U.S. Consumer Debt Grows at an Alarming Rate*, Wash. Post, Jan. 12, 2004.

reinvested. For example, ACA members recovered and returned over \$40 billion in 2007 alone, a massive infusion of money into the national economy.¹⁰

Without an effective collection process, the economic viability of these businesses, and by extension, the American economy in general, is threatened. At the very least, Americans are forced to pay higher prices to compensate for uncollected debt.

III. The TCPA and January 2008 Declaratory Ruling.

On December 20, 1991, Congress enacted the TCPA in an effort to protect consumers from a growing number of telemarketing calls and telemarketing practices that Congress found to be invasive of privacy rights. The TCPA regulates the use of automated telephone equipment.¹¹ It prohibits the use of any automatic telephone dialing system to call any cellular telephone number absent an emergency purpose or the prior express consent of the called party.¹² The Commission's rules on autodialed and prerecorded message calls to cellular telephone numbers incorporated the language of the TCPA almost verbatim.¹³

Congress recognized the delicate balance required to protect the individual's privacy rights while not interfering with relationships between consumers and businesses. Congress was particularly mindful that "[i]ndividual privacy rights, public safety interests,

¹⁰ PricewaterhouseCoopers, Value Of Third-Party Debt Collection To The U.S. Economy in 2007: Survey and Analysis, *available at* <http://www.acainternational.org/files.aspx?p=/images/12546/pwc2007-final.pdf>.

¹¹ 47 U.S.C. § 227(b).

¹² 47 U.S.C. § 227(b)(1)(A).

¹³ 47 C.F.R. § 64.1200(a)(1)(iii).

and commercial freedoms of speech and trade must be balanced in a way that protects the privacy of individuals and permits legitimate telemarketing practices.”¹⁴ The TCPA balances these interests by restricting certain uses of autodialers by telemarketers. Except for emergency calls or calls made with the *prior express consent* of the person called, the statute provides that autodialers may not be used for telemarketing in order to call a cellular telephone service or any service for which the person being called would be charged for the call. In relevant part, the TCPA made it unlawful “to make any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice . . . to any telephone number assigned to a . . . cellular telephone service . . . or any service for which the called party is charged for the call.”¹⁵

The TCPA, however, does not prohibit the use of autodialers by creditors or collectors when attempting to recover payment obligations for goods and services received by consumers. The legislative history of the TCPA contains numerous statements from Members of Congress singling out the non-telemarketing conduct of creditors and collectors as *not a target* of the legislation. For example, former New York Representative Norman Lent stated:

[The TCPA] explicitly recognizes that there are certain classes and categories of calls that consumers do not mind, and in fact would probably like to receive. *Calls informing a consumer that a bill is overdue, or a previously unstocked item is now available at a store are clearly not burdensome, and should not be prohibited.*¹⁶

¹⁴ 137 Cong. Rec. S18781-02, at S18782 (Nov. 27, 1991).

¹⁵ 47 U.S.C. § 227(b)(1)(A)(iii).

¹⁶ 137 Cong. Rec. H11307-01 at H11312 (Nov. 26, 1991) (emphasis added).

Similarly, former Senator Fritz Hollings noted that “[s]ome debt collection agencies use automated or prerecorded messages for outstanding bills. The FCC should consider whether these types of calls should be exempted and under what conditions such an exemption should be granted either as a noncommercial call or as a category of calls that does not invade the privacy rights of consumers.”¹⁷

Further, Congress gave the Commission the authority to carve out exceptions for calls that did not invade privacy rights and noted, in particular, that collection calls fall into this category. For example, Massachusetts Representative Edward Markey described the TCPA as allowing the Commission “to exempt, by rule or order, classes or categories of calls made for commercial purposes that do not ‘adversely affect the privacy rights’ that this section of the bill is intended to protect and, that ‘do not include the transmission of any unsolicited advertisement.’ *An example of such a use may be to leave messages with consumers to call a debt collection agency to discuss their student loan or to notify a consumer that a product they have ordered is ready to be picked up at the store.*”¹⁸

On October 4, 2005, ACA filed a petition seeking clarification that the prohibition against autodialed or prerecorded calls to wireless telephone numbers in 47 C.F.R. § 64.1200(a)(1)(iii) does not apply to creditors and collectors when calling wireless telephone numbers to recover payments for goods and services received by consumers.¹⁹

¹⁷ 137 Cong. Rec. S18781-02, S18784 (Nov. 27, 1991) (emphasis added).

¹⁸ 137 Cong. Rec. H-11307-01, H11310 (Nov. 26, 1991) (emphasis added).

¹⁹ Declaratory Ruling.

On April 5, 2006, the Commission sought comment on ACA's petition.²⁰ Mr. Edwards filed no comment. ACA filed a supplemental filing on April 26, 2006, arguing that the Commission's determination that predictive dialers fall within the meaning of the statutory definition of "automated telephone dialing equipment" was incorrect and conflicted with the language of the TCPA.²¹ This notice and comment proceeding resulted in a FCC Declaratory Ruling issued on January 8, 2008 ("January 2008 Order").²²

In the January 2008 Order, the FCC ruled that that a predictive dialer constitutes an automatic telephone dialing system and is subject to the TCPA's restrictions on the use of autodialers.²³ The Commission noted that the TCPA does not ban the use of automated dialing technology.²⁴ The Order clearly states that creditors and debt collectors may use predictive dialers to call wireless phones, provided the wireless phone number was provided by the subscriber in connection with the existing debt.²⁵ The voluntary act of providing the telephone number gives prior express consent by the called

²⁰ *Consumer & Governmental Affairs Bureau Seeks Comment on ACA International's Petition for an Expedited Clarification and Declaratory Ruling Concerning the Telephone Consumer Protection Act (TCPA) Rules*, Public Notice, 21 FCC Rcd 3600 (2006). Comments were due May 11, and replies were due May 22, 2006. See 71 Fed. Reg. 24634 (April 26, 2006).

²¹ ACA International's Supplemental Submission to Petition for an Expedited Clarification and Declaratory Ruling, filed April 26, 2006.

²² *ACA International*, 23 FCC Rcd 559.

²³ *Id.* at ¶ 12.

²⁴ *Id.* at ¶ 14.

²⁵ *Id.*

party.²⁶ The Commission noted that the act of voluntarily releasing a phone number is tantamount to giving permission to be called at the number.²⁷ This observation is entirely consistent with the extensive record developed by the Commission in TCPA proceedings during the past seventeen years.²⁸ As the Commission observed in 1992:

Many commenters express the view that any telephone subscriber that provides his or her telephone number to a business does so with the expectation that the party to whom the number was given will return the call. **Hence, any telephone subscriber who releases his or her telephone number has, in effect, given prior express consent to be called by the entity to which the number was released.**²⁹

The Commission's response to these commenters as reflected in the *1992 TCPA Order* was unequivocal: "If a call is otherwise subject to the prohibitions of § 64.1200, *persons who knowingly release their phone numbers have in effect given their invitation or permission to be called at the number which they have given*, absent instructions to the contrary."³⁰ In adopting this position, the Commission cited the legislative history of the TCPA as supporting its interpretation that "in such instances 'the called party has in essence requested the contact by providing the caller with their telephone number for use

²⁶ *ACA International*, 23 FCC Rcd 559.

²⁷ *Id.*

²⁸ See Notice of Proposed Rulemaking in the Matter of the Telephone Consumer Protection Act of 1991, 7 FCC Rcd. 2736, at ¶ 37 (rel. April 17, 1992) ("1992 TCPA Order") (stating that "[c]ommenters concur that debt collection calls are exempt as calls to parties with whom the caller has a prior existing business relationship, and further argue that debtors have given prior express consent to such calls by incurring a debt") (footnotes omitted).

²⁹ *1992 TCPA Order*, at ¶ 30 (emphasis added).

³⁰ *1992 TCPA Order*, at ¶ 30 (emphasis added).

in normal business communications.”³¹ ACA notes that Commission did not particularize these statements to the release of only wireless telephone numbers.

Later in the *1992 TCPA Order*, the Commission again discussed the subject of prior express consent, this time in the specific context of debt collection. The Commission stated:

Commenters generally support an exemption for debt collection calls. Commenters concur that debt collection calls are exempt as calls to parties with whom the caller has a prior or existing business relationship, and further argue that debtors have given prior express consent to such calls by incurring a debt.³²

The Commission responded to these comments by stating that an express exemption was unnecessary because other exemptions authorize the calls.³³

³¹ *1992 TCPA Order*, at ¶ 31 & fn. 57 (citing House Report, 102-317, 1st Sess., 102nd Cong. (1991), at 13)).

³² *1992 TCPA Order*, at ¶ 37 (footnote omitted).

³³ *1992 TCPA Order*, at ¶ 39 (“Upon consideration of these comments, we conclude that an express exemption from the TCPA's prohibitions for debt collection calls is unnecessary because such calls are adequately covered by exemptions we are adopting here for commercial calls which do not transmit an unsolicited advertisement and for established business relationships. As proposed in the NPRM, these exemptions would also apply where a third party places a debt collection call on behalf of the company holding the debt.”)

IV. Response to Request for Comment.

The January 2008 Order very clearly states that creditors seeking to collect a debt may use autodialed or prerecorded messages to call wireless service numbers if they have the prior express consent of the called party. This unambiguously confirms not only the record developed in response to ACA's petition, but the extensive record in prior TCPA proceedings which make clear that when a consumer provides a telephone number to invite communications with creditors and debt collectors, it is not a violation of the TCPA to contact the consumer using autodialed or prerecorded messages at that number.

Although the January 2008 Order did not expressly address the porting issues now raised by Mr. Edwards, it did so implicitly in the larger context of concluding that collection calls with verifiable prior express consent are permissible. ACA sees no reason why the same analysis used to conclude in January 2008 that creditors and debt collectors can use autodialed or prerecorded messages to contact a consumer should not be applied to the situation described by the Petition. The ported telephone number has been provided by the consumer in connection with an existing debt. Therefore, autodialed or prerecorded messages made to the ported telephone number have the prior express consent of the called party. The January 2008 Order clearly allows creditors to contact ported numbers using autodialed or prerecorded messages if they have the prior express consent of the called party.

In the situation described in the Petition, the consumer has already given prior express consent to be called at a specific telephone number.³⁴ The number provided by

³⁴ Petition at 2.

the consumer was previously associated with a landline service and has been ported to a wireless service.³⁵ The proper construction of the TCPA regarding this situation is that the prior express consent of the consumer attaches to the provided telephone number and not to the type of service associated with that number. A contrary construction finds no basis in the TCPA nor the Commission's implementing rule and orders, as well as being simply unworkable.

Cellular phones and cellular phone numbers are limited to certain contract periods. Porting the telephone number allows the consumer to avoid the difficulties associated with changing telephone numbers. The consumer has already indicated his or her preference regarding what number the creditor should use for communications by providing the telephone number to the creditor. By porting the number, which the consumer has given prior express consent for the creditor to use, to a wireless device, the consumer is reasonably giving prior express consent to receive autodialed or prerecorded messages on that device. Given prior express consent, the January 2008 Order clearly states that autodialed and prerecorded message calls may be used by creditors in connection with collecting an existing debt.³⁶

The construction urged by the Petition would prevent consumers from being contacted at their preferred telephone numbers. The Commission has already ruled that consumers are giving prior express consent when they provide a creditor with a wireless telephone number. This implies that consumers would like to be contacted using the telephone number they provided previously in connection with the debt. A consumer

³⁵ *Id.*

³⁶ *ACA International*, at 564, ¶ 9.

ports a telephone number in order to continue to be contacted at their preferred telephone number despite their change in telephone service. If the Petition's construction of the TCPA is implemented, consumers would no longer be able to be contacted at their preferred telephone numbers if they choose to port that number from a landline service to a wireless service. This confusing situation would be imposed on the consumer without any tangible benefits.

The Petition's construction would also impose large costs on industry. Porting numbers from a landline service to a wireless service is commonplace. The Commission estimates that 2.98 million subscribers ported their numbers from a landline service to a wireless service from December 2003 through December 2007, with around 896,000 of these ports occurring in 2007.³⁷ Creditors would be forced to treat every telephone number associated with a landline as a possible ported number. This would lead to impossible situations for call-forwarding from a landline service to a wireless service.

The costs of debt collection would also increase. Every time a creditor makes an autodialed or prerecorded message call to a telephone number, which the consumer has given prior express consent for the creditor to use, the calling party would have to check with a wireless database to see if the consumer had ported that number to a wireless device. The cost of determining whether a consumer had ported his or her telephone number would be extremely high. The effect would be to make it cost-prohibitive to call consumers at all.

³⁷ *Federal Communication Commission's Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, Thirteenth Report*, (January 16, 2009), DA 09-54A1 at 88, ¶ 184.

Creditors would also suffer from their inability to place autodialed and prerecorded message calls to the consumers preferred telephone number. Consumers who place a telephone number on a credit application expect to be contacted at that specific number. If the consumers port that telephone number from a landline service to a wireless service, they will not clearly understand why they can no longer receive calls at that number without additional steps being taken. This is likely to result in consumer confusion.

V. **Conclusion.**

The Petition's construction of the TCPA rules is clearly erroneous and directly contradicts the plain meaning of the statute and the January 2008 Order. It would impose massive costs on both consumers and industry and it would only benefit opportunistic consumers in generating TCPA violations. For these reasons, ACA respectfully requests that Paul D.S. Edwards' Petition for Expedited Clarification be denied.

If you have any questions, please contact Andrew Beato at 202-737-7777.



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