

BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

ADVANCED TELCOM, INC., d/b/a
ADVANCED TELCOM GROUP; AT&T
COMMUNICATIONS OF THE PACIFIC
NORTHWEST and TCG SEATTLE; COVAD
COMMUNICATIONS COMPANY;
ELECTRIC LIGHTWAVE, LLC.;
ESCHELON TELECOM OF
WASHINGTON, INC.; FAIRPOINT
CARRIER SERVICES, INC. f/k/a
FAIRPOINT COMMUNICATIONS
SOLUTIONS CORP.; GLOBAL CROSSING
LOCAL SERVICES, INC.; INTEGRA
TELECOM OF WASHINGTON, INC.;
McLEODUSA, TELECOMMUNICATIONS
SERVICES, INC.; SBC TELECOM, INC.;
QWEST CORPORATION; WORLDCOM,
INC.; and XO WASHINGTON, INC., f/k/a
NEXTLINK COMMUNICATIONS, INC.,

Respondents.

Docket No. UT-033011

**MCI'S REPLY TO STAFF AND
PUBLIC COUNSEL**

I. INTRODUCTION

1. Respondent WorldCom, Inc., on behalf of its regulated subsidiaries in Washington State (n/k/a "MCI"), by and through its attorneys of record, Ater Wynne LLP, hereby submits its

Reply to the Responses filed by Staff and Public Counsel in opposition to MCI's Motion to Dismiss or for Summary Determination. In support of this Reply, MCI states as follows:

II. ARGUMENT

2. In its Motion to Dismiss or for Summary Determination, MCI pointed out that Section 252 of the Federal Telecommunications Act does not contain any deadline by which an agreement must be filed; nor does Washington State law. In its response, Staff concedes that Section 252 "is silent on the timeline for filing interconnection agreements..." (Staff Response at p. 12, ¶23) but argues, nevertheless, that interconnection agreements must be filed "within a reasonable period of time." *Id.* Staff argues that the measure of what is a "reasonable period of time" is set by the fact that the Commission's Interpretive and Policy Statement Regarding Negotiation, Mediation, Arbitration, and Approval of Agreements Under the Telecommunications Act, Docket No. UT-960269, provides that interconnection agreements should be filed within 30 days of their execution. Staff's Reply at p. 13, ¶24. However, as pointed out by MCI in its Motion to Dismiss or for Summary Determination, pursuant to RCW 34.05.230(1), that statement is advisory only. Therefore, it cannot provide the basis for finding a violation of either federal or state law. Nor can it provide the basis for imposition of any monetary penalty against MCI or Qwest.

3. Public Counsel cites WAC 480-07-640(2)(a)(i) in support of its argument that interconnection agreements must be filed within 30 days of execution. However, WAC 480-07-640(2)(a)(i) is a new rule that has only recently become effective. Therefore, it does not apply to the agreements at issue in this case, nor can be provide the basis for imposing a monetary penalty.

4. Curiously, Staff argues that Agreement No. A31 between MCI WorldCom, Inc. (“MCI”) and U S WEST Communications, Inc. (“Qwest”) provides for access to and pricing of intrastate dark fiber, T1 facilities, and SONET facilities. Acknowledging that MCI and Qwest claim that the agreement pertains only to interstate services, Staff nevertheless argues that these facilities also can be used for the provision of local telecommunications. Staff then states: “It is unclear whether MCI used or intends to use these facilities to provide local service. If so, the agreement should have been filed and made available to other carriers.” Staff Response at pp. 18-19, ¶38. On its face, Agreement No. A31 recites that MCI purchases the subject services from Qwest “pursuant to a tariff known as ‘FCC No. 5,’ which [Qwest] files with the Federal Communications Commission (‘FCC’).” Agreement No. A31, p. 1. The Agreement also recites that MCI filed a complaint against Qwest at the FCC seeking resolution of certain disputes concerning the purchase and provision of telecommunications services “under FCC No. 5, *MCI Telecommunications Corp. v. U S WEST Communications, Inc.*, File No. E-96-38 (the ‘FCC Complaint’).” *Id.* By its terms, the Agreement then describes the enumerated disputes settled in the Agreement, which all relate to services purchased from FCC No. 5. It describes: (a) billing disputes concerning certain services purchased from FCC No. 5 (dark fiber, disconnected circuits, non-recurring access charges associated with switched access trunks and back-billed charges); (b) the FCC Complaint; (c) billing disputes relating to a Regional Commitment Plan set forth in FCC No. 5 pursuant to which MCI purchases T-1 facilities; (d) disputes relating to a SONET Ring Service Partnership program, which is an optional pricing plan under FCC No. 5; and (e) the impact of an FCC determination regarding implementation of the Base Factor Portion to various interstate access charges from Qwest to MCI. Again, from the face of Agreement No. A31 it is

clear that only jurisdictionally interstate services are involved. Thus, the Amended Complaint should be dismissed as to Agreement No. A31.

5. Staff argues that Agreement No. A35 between MCI WorldCom Network Services, Inc. ("MCI") and Qwest provides for terms and conditions related to the decommissioning of collocated facilities; therefore, "it is an ongoing obligation related to collocation and is an interconnection agreement subject to the filing requirements of the Act." Staff Response at p. 19, ¶40. Simply because a settlement agreement relates to decommissioning of collocation facilities does not automatically make it an interconnection agreement. As stated by the FCC in *In the Matter of Qwest Communications International Inc. Petition for Declaratory Ruling on the Scope of the Duty to File and Obtain Prior Approval of Negotiated Contractual Agreements Under Section 252(a)(1)*, WC Docket No. 02-89, Memorandum Opinion and Order, FCC 02-276, 17 FCC Rcd. 19, 337, ¶8 (October 4, 2002), note 26: "[W]e find that only those agreements that contain an *ongoing* obligation relating to section 251(b) or (c) must be filed under 252(a)(1)." (Emphasis added). Further, the FCC held that a settlement agreement providing for "backward-looking consideration," such as a cash payment, need not be filed. *Id.* at ¶¶12-14. The language of Agreement No. A35 clearly reflects a settlement agreement providing for "backward-looking consideration," specifically a cash payment as reimbursement for non-recurring and recurring charges paid as final resolution to disputes arising between the parties regarding the terms and conditions of the return of facilities and settlement of financial obligations of each party with respect to the facilities under the interconnection agreement between them.

6. Finally, Staff argues that Agreements Nos. A34 and A35 between MCI and Qwest were not timely filed because they were not filed until August 22, 2002, which was more than 30

days after their respective executions. As discussed above, neither federal nor state law contains an express deadline by which interconnection agreements must be filed. Therefore, the fact that these agreements were not filed within 30 days of their execution cannot be the basis for a finding of a violation of federal or state law; nor can it be the basis for imposition of a monetary penalty against MCI or Qwest. The salient fact is that both agreements have been filed with the Commission and available for any other carrier to opt-into. Therefore, by definition, no discrimination against other carriers has occurred. Both agreements should be dismissed from the complaint.

III. CONCLUSION

7. For the reasons discussed above and in MCI's Motion to Dismiss or for Summary Determination, MCI requests that the Commission dismiss the First and Fourth Causes of Action and dismiss the Second Cause of Action as to MCI with respect to Agreement Nos. A31, A34 and A35.

RESPECTFULLY SUBMITTED this 5th day of January, 2004.

ATER WYNNE, LLP

By 

Arthur A. Butler, WSBA # 04678
601 Union Street, Suite 5450
Seattle, Washington 98101-2327
Tel: (206) 623-4711
Fax: (206) 467-8406
Email: aab@aterwynne.com

Attorneys for MCI

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of January, 2004, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn	<input type="checkbox"/>	Hand Delivered
Executive Secretary	<input type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities and Transportation Commission	<input checked="" type="checkbox"/>	Overnight Mail (UPS)
1300 S Evergreen Park Drive SW	<input type="checkbox"/>	Facsimile (360) 586-1150
Olympia, WA 98504-7250	<input checked="" type="checkbox"/>	Email (records@wutc.wa.gov)

I hereby certify that I have this 5th day of January, 2004, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

On Behalf Of Eschelon:

Dennis D. Ahlers	<input type="checkbox"/>	Hand Delivered
Eschelon Telecom, Inc.	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
730 2nd Avenue South, Suite 1200	<input type="checkbox"/>	Overnight Mail (UPS)
Minneapolis MN 55402-2456	<input type="checkbox"/>	Facsimile (612) 436-6792
<i>Confidentiality Status: Public</i>	<input checked="" type="checkbox"/>	Email (ddahlers@eschelon.com)

On Behalf Of Advanced TelCom:

Victor A. Allums	<input type="checkbox"/>	Hand Delivered
GE Business Productivity Solutions, Inc.	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
6540 Powers Ferry Road	<input type="checkbox"/>	Overnight Mail (UPS)
Atlanta GA 30339	<input type="checkbox"/>	Facsimile (770) 644-7752
<i>Confidentiality Status: Public</i>	<input checked="" type="checkbox"/>	Email (vic.allums@ge.com)

On Behalf Of Qwest:

Lisa A. Anderl	<input type="checkbox"/>	Hand Delivered
Qwest Corporation	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
1600 7th Avenue, Room 3206	<input type="checkbox"/>	Overnight Mail (UPS)
Seattle WA 98191	<input type="checkbox"/>	Facsimile (206) 343-4040
<i>Confidentiality Status: Confidential</i>	<input checked="" type="checkbox"/>	Email (lisa.anderl@qwest.com)

On Behalf Of Faripoint, Integra & SBC:

Seth Bailey
Law Office of Richard A. Finnigan
2405 Evergreen Park Drive SW, Suite B-1
Olympia WA 98502

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 753-6862
 Email (sbailey@ywwave.com)

On Behalf Of Electric Lightwave:

Mr. Charles L. Best
Electric Lightwave Inc.
4400 NE 77th Ave
Vancouver WA 98662

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 816-0999
 Email (charles_best@eli.net)

On Behalf Of Advanced TelCom:

Lon E. Blake
Advanced TelCom, Inc.
3723 Fairview Industrial Drive SE
Salem OR 97302

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email (lblake@atgi.net)

On Behalf Of AT&T:

Cathy L. Brightwell
AT&T Government Affairs
2120 Caton Way SW, Suite B
Olympia WA 98502-1106

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 705-4177
 Email (brightwell@att.com)

On Behalf Of Eschelon:

Richard J. Busch
Graham & Dunn, PC
Pier 70
2801 Alaskan Way, Suite 300
Seattle WA 98121-1128

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 340-9599
 Email (rbusch@grahamdunn.com)

On Behalf Of XO:

Jodi Campbell
XO Washington, Inc.
1111 Sunset Hills Drive
Reston VA 20190

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (703) 547-2830
 Email

On Behalf Of Advanced TelCom & Covad:

William R. Connors
Miller Nash LLP
601 Union Street, Suite 4400
Seattle WA 98101-1367

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 622-7485
 Email (bill.connors@millernash.com)

On Behalf Of Public Counsel:

Robert W. Cromwell Jr.
Attorney General of Washington
Public Counsel Section
900 Fourth Avenue, Suite 2000, TB-14
Seattle WA 98164-1012

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 389-2058
 Email (RobertC1@atg.wa.gov)

On Behalf Of WorldCom:

Haleh S. Davary
WorldCom, Inc.
201 Spear Street, Ninth Floor
San Francisco CA 94105

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (415) 228-1094
 Email (Haleh.Davary@mci.com)

On Behalf Of Advanced TelCom:

Erin W. Emmott
Kelley Drye & Warren LLP
1200 19th Street NW, Suite 500
Washington DC 20036-2423

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (202) 955-9792
 Email (eemmott@kelleydrye.com)

On Behalf Of Eschelon:

Judith Endejan
Graham & Dunn, PC
Pier 70
2801 Alaskan Way, Suite 300
Seattle WA 98121-1128

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 340-9599
 Email (jendejan@grahamdunn.com)

On Behalf Of Fairpoint, Integra & SBC:

Richard A. Finnigan
Law Office of Richard A. Finnigan
2405 Evergreen Park Drive SW, Suite B-1
Olympia WA 98502

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 753-6862
 Email (rickfinn@ywave.com)

On Behalf Of Covad:

Karen S. Frame
Covad Communications Company
7901 Lowry Boulevard
Denver CO 80230-6906

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (720) 208-3350
 Email (kframe@covad.com)

On Behalf Of AT&T:

Letty S. Friesen
AT&T Communications of the Pacific
Northwest
Law Department
1875 Lawrence Street, Suite 1500
Denver CO 80202

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 298-6301
 Email (lfriesen@lga.att.com)

On Behalf Of Covad:

Lynn Hankins
Covad Communications Company
7901 Lowry Boulevard
Denver CO 80230-6906

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (720) 208-3350
 Email (lhankins@covad.com)

On Behalf Of McLeodUSA:

Lauraine Harding
McLeodUSA Telecommunications Services,
Inc.
6400 C Street SW
PO Box 3177
Cedar Rapids IA 52405-3177

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (319) 790-7901
 Email

**On Behalf Of Advanced TelCom, Covad & GE
Business Productivity:**

Brooks E. Harlow
Miller Nash LLP
601 Union Street, Suite 4400
Seattle WA 98101-1367

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 622-7485
 Email (brooks.harlow@millernash.com)

On Behalf Of Integra:

Karen J. Johnson
Integra Telecom of Washington, Inc.
19545 NW Von Neumann Dr., Suite 200
Beaverton OR 97006-6906

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 748-1212
 Email (karen.johnson@integratelecom.com)

On Behalf Of XO Communications:

Gregory J. Kopta
Davis Wright Tremaine LLP
1501 4th Avenue, Suite 2600
Seattle WA 98101-1688

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 628-7699
 Email (gregkopta@dwt.com)

On Behalf Of Fairpoint:

John Lapenta
Fairpoint Communications
521 E. Morehead Street
Charlotte NC 28202-2695

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile
 Email

On Behalf Of Qwest:

Todd Lundy
Qwest Corporation
1801 California Street, Suite 4700
Denver CO 80202

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 295-7069
 Email (todd.lundy@qwest.com)

On Behalf Of Qwest:

Cynthia Mitchell
Hogan & Hartson L.L.P.
1470 Walnut Street, Suite 200
Boulder CO 80302

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (720) 406-5301
 Email (cmitchell@hhlaw.com)

On Behalf Of Advanced TelCom:

Brad E. Mutschelknaus
Kelley Drye & Warren LLP
1200 19th Street NW, Suite 500
Washington DC 20036-2423

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (202) 955-9792
 Email (bmutschelknaus@kelleydrye.com)

On Behalf Of Global Crossing:

Teresa S. Reff
Global Crossing Local Services, Inc.
1080 Pittsford Victor Road
Pittsford NY 14534

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (585) 381-7592
 Email (teresa.reff@globalcrossing.com)

On Behalf Of WUTC:

Ann E. Rendahl ALJ
Washington Utilities and Transportation
Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia WA 98504-7250

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 586-8203
 Email (arendahl@wutc.wa.gov)

On Behalf Of Qwest:

Mark S. Reynolds
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle WA 98191

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 346-7289
 Email (mark.reynolds3@qwest.com)

On Behalf Of Qwest:

Martha Russo
Hogan & Hartson L.L.P.
555 Thirteenth Street NW
Washington DC 20004

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (202) 637-5910
 Email (mrusso@hhlaw.com)

On Behalf Of SBC:

John Schnettgoecke
SBC Telecom, Inc.
1010 N St. Mary's, Room 13K
San Antonio TX 78215

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (210) 246-8759
 Email (js3876@sbc.com)

On Behalf Of Qwest:

Adam L. Sherr
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle WA 98191

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 343-4040
 Email (adam.sherr@qwest.com)

On Behalf Of MCI:

Michel L. Singer Nelson
WorldCom, Inc.
707 17th Street, Suite 4200
Denver CO 80202-3432

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 390-6333
 Email (michel.singer_nelson@mci.com)

On Behalf Of Staff:

Shannon Smith
Attorney General of Washington
Utilities & Transportation Division
1400 S Evergreen Park Drive SW
PO Box 40128
Olympia WA 98504-0128

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 586-5522
 Email (ssmith@wutc.wa.gov)

On Behalf Of Qwest:

Peter S. Spivack
Hogan & Hartson L.L.P.
555 Thirteenth Street NW
Washington DC 20004

Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (202) 637-5910
 Email (psspivack@hhlaw.com)

On Behalf Of AT&T:

Mary Steele
Davis Wright Tremaine LLP
1501 4th Avenue, Suite 2600
Seattle WA 98101-1688

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 628-7699
 Email (marysteele@dwt.com)

On Behalf Of Electric Lightwave:

Lance Tade
Electric Lightwave Inc.
4 Triad Center, Suite 200
Salt Lake City UT 84180

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (801) 924-6363
 Email

On Behalf Of AT&T:

Mary Taylor
AT&T Government Affairs
2120 Caton Way SW, Suite B
Olympia WA 98502-1106

Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 705-4177
 Email (marymtaylor@att.com)

On Behalf Of Time Warner Telecom:

Brian D. Thomas
Time Warner Telecom
223 Taylor Avenue North
Seattle WA 98109-5017
Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 676-8001
 Email (brian.thomas@twtelecom.com)

On Behalf Of AT&T:

Mary B. Tribby
AT&T Communications
1875 Lawrence Street, Suite 1575
Denver CO 80202
Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (303) 298-6301
 Email (mbtribby@att.com)

On Behalf Of Global Crossing:

Mark P. Trincherro
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2300
Portland OR 97201-5682
Confidentiality Status: Public

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (503) 778-5299
 Email (marktrincherro@dwt.com)

On Behalf Of AT&T:

Daniel M. Waggoner
Davis Wright Tremaine LLP
1501 4th Avenue, Suite 2600
Seattle WA 98101-1688
Confidentiality Status: Confidential

Hand Delivered
 U.S. Mail (first-class, postage prepaid)
 Overnight Mail (UPS)
 Facsimile (206) 628-7699
 Email (danwaggoner@dwt.com)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 5th day of January, 2004, at Seattle, Washington.


