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1 BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
2 COMMISSION

3 In the Matter of the )  
4 Request of Sprint Nextel )  
5 Declining to Assert )  
6 Alternative, Application of ) Docket No. UT-051291  
7 Sprint Nextel Corporation for ) Volume I  
8 Approval of the Transfer of ) Pages 1 - 22  
9 Control of United Telephone )  
10 Company of the Northwest and )  
11 Sprint Long Distance, Inc., )  
12 From Sprint Nextel Corporation )  
13 to LTD Holding Company. )

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12 A prehearing conference in the above matter  
13 was held on October 7, 2005, at 1:32 p.m., at 1300  
14 South Evergreen Park Drive Southwest, Olympia,  
15 Washington, before Administrative Law Judge DENNIS  
16 MOSS.

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18 The parties were present as follows:

19 SPRINT NEXTEL, by GREGORY J. KOPTA, Attorney  
20 at Law, Davis, Wright, Tremaine, 1501 Fourth Avenue,  
21 Suite 2600, Seattle, Washington 98101-1688; telephone,  
22 (206) 628-7692.

23 SPRINT NEXTEL, by WILLIAM E. HENDRICKS III,  
24 Attorney at Law, 902 Wasco Street, Hood River, Oregon  
25 97031; telephone, (541) 387-9439.

24 Kathryn T. Wilson, CCR  
25 Court Reporter

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1 WASHINGTON UTILITIES AND TRANSPORTATION  
2 COMMISSION, by GREGORY J. TRAUTMAN, Assistant Attorney  
3 General, 1400 South Evergreen Park Drive Southwest,  
4 Post Office Box 40128, Olympia, Washington 98504;

3 telephone, (360) 664-1187.  
4 PUBLIC COUNSEL, by ROBERT W. CROMWELL (via  
5 bridge) Assistant Attorney General, 900 Fourth Avenue,  
6 Suite 2000, Seattle, Washington 98164-1012; telephone,  
7 (206) 464-6595.  
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1 PROCEEDINGS  
2 JUDGE MOSS: Good afternoon, everyone. My  
3 name is Dennis Moss. I'm an administrative law judge  
4 for the Washington Utilities and Transportation  
5 Commission. We are here this afternoon in Docket No.  
6 UT-051291, concerning the Application of Sprint Nextel  
7 Corporation. I'm not going to recite the rather long  
8 caption. The court reporter has that and it will  
9 appear on the transcript.  
10 The essence of the Application is for  
11 approval of the transfer of control of United Telephone  
12 Company of the Northwest and Sprint Long Distance,  
13 Inc., from Sprint Nextel Corporation to LTD Holding  
14 Company. There is an alternative plea for declaration  
15 to assert jurisdiction.  
16 Let's take appearances, and we will start  
17 with Sprint Nextel or Sprint or Nextel.  
18 MR. HENDRICKS: Trey Hendricks on behalf of  
19 Sprint Nextel Corporation, and my address is 902 Wasco  
20 Street, Hood River, Oregon, 97031. My telephone number  
21 is (541) 387-9439. My fax number is (541) 387-9753,  
22 and my e-mail address is  
23 tre.e.hendricks.iii@sprint.com.  
24 MR. KOPTA: Gregory J. Kopta of the law firm  
25 Davis, Wright, Tremaine, LLP, also for the applicants.

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1 My address is 2600 Century Square, 1501 Fourth Avenue,  
2 Seattle, Washington, 98101-1688. Telephone is (206)  
3 628-7692; fax, (206) 628-7699; e-mail,  
4 gregkopta@dwt.com.  
5 JUDGE MOSS: Since we have you in the room,  
6 Mr. Trautman, why don't we get Staff's appearance next,  
7 and then we will turn to those on the conference bridge  
8 line.

9 MR. TRAUTMAN: Gregory J. Trautman, assistant  
10 attorney general, representing Commission staff. My  
11 address is 1400 South Evergreen Park Drive Southwest,  
12 Post Office Box 40128, Olympia, Washington, 98504. My  
13 telephone number is area code (360) 664-1187. My fax  
14 number is (360) 586-5522, and my e-mail address is  
15 gtrautma@wutc.wa.gov.

16 JUDGE MOSS: Thank you. Mr. Cromwell?

17 MR. CROMWELL: Robert W. Cromwell, Junior,  
18 assistant attorney general, appearing on behalf of the  
19 Public Counsel section of the attorney general's  
20 office. My address is 900 Fourth Avenue, Suite 2000.  
21 Seattle, Washington, 98164-1012. My direct line is  
22 area code (206) 464-6595. My fax is (206) 389-2079.  
23 My e-mail address is robertcl@atg.wa.gov.

24 JUDGE MOSS: Are you still with us,  
25 Mr. Cromwell? I think somebody must have joined us on

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1 the bridge line. So far as I know, the Commission has  
2 not received any written petitions to intervene, but  
3 let me ask if there is anybody else on the bridge line  
4 who wishes to enter an appearance and petition for such  
5 status. Apparently there is not.

6 So let us turn to the business at hand for  
7 our prehearing conference. Have the parties commenced  
8 discovery in this case?

9 MR. KOPTA: Not yet, Your Honor, but I'm  
10 assuming we would want to invoke the discovery rule.

11 JUDGE MOSS: Staff would want to have  
12 discovery in the case?

13 MR. TRAUTMAN: Yes.

14 JUDGE MOSS: Then that will be the rules by  
15 which you govern yourselves subject to any agreements  
16 that are mutually acceptable.

17 I have a proposed protective order that's  
18 been handed out to me by Mr. Hendricks. Have the  
19 parties all looked at this and had an opportunity to  
20 discuss it, Mr. Hendricks?

21 MR. HENDRICKS: We have had discussions about  
22 the protective order. It's been a little while since  
23 we've talked about it, so I guess I might ask if Public  
24 Counsel and Staff are still agreeable to what we  
25 discussed earlier.

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1 MR. TRAUTMAN: Is the protective order in the  
2 same form as the protective agreement that we've  
3 executed for the interim period?

4 MR. HENDRICKS: Yes.

5 MR. TRAUTMAN: Then Staff would have no  
6 objection to the order.

7 MR. KOPTA: Just for clarification purposes,  
8 this is essentially the same order that the Commission  
9 issued in the Verizon/MCI merger docket, and we can  
10 provide you with an electronic copy for the ease of the  
11 Bench.

12 JUDGE MOSS: Thank you. Mr. Cromwell, are  
13 you in agreement with the protective order as crafted?

14 MR. CROMWELL: Yes. Assuming what  
15 Mr. Hendricks has set up what we've already agreed to,  
16 I have no concerns about that.

17 JUDGE MOSS: I think we can be confident of  
18 that, so we will see to it that the Commission enters  
19 this. I would like to receive the electronic copy, and  
20 I will review the order and make sure that its terms  
21 are satisfactory to the Commission in terms of what we  
22 typically have, and then I will see to its execution by  
23 the appropriate persons, whether that be me or the  
24 commissioners.

25 In the meantime, the parties can govern  
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1 themselves in accordance with these terms since they  
2 are all in agreement, and then we don't have any third  
3 parties participating so the confidentiality issues are  
4 not as significant as they might otherwise be. Before  
5 we turn to the schedule, is there anything else the  
6 parties wanted to raise?

7 MR. TRAUTMAN: Your Honor, I don't know at  
8 what point we should address this, but as I was looking  
9 at the notice of prehearing conference, it states  
10 generally that the ultimate issues include whether the  
11 proposed Application complies with the above referenced  
12 statutes, those being statutes from Title 80 and Title  
13 34, and as otherwise in the public interest, and that  
14 is the standard that the Commission will use to look at  
15 the filing.

16 The prehearing conference also states that  
17 one of the purposes to consider formulating the issues  
18 in the proceeding, and Staff wanted to identify, just  
19 wanted to make sure that the prehearing conference  
20 order articulates that there are two particular issues  
21 Staff wishes to address, among others, in determining  
22 the public interest of the transaction.

23 One would be the possible imputation of  
24 Yellow Pages revenues and/or the effect on rates in  
25 light of the fact that the Yellow Pages has been sold

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1 and the gain on sale has been attributable to Sprint,  
2 but now that the Company is going to be a stand-alone  
3 company, it will no longer have the tie-in to Sprint.  
4 So we may need to look at that and the ramifications  
5 and/or rate impact of that as a possible condition on  
6 the transfer or as part of the public interest  
7 investigation.

8 Second would be investigating a possible rate  
9 rebalancing. It would likely be a revenue-neutral rate  
10 rebalancing of access charges or retail rates, again in  
11 light of the fact that it will now be a stand-alone  
12 company without the benefit of having the tie-in to the  
13 parent, and Staff is concerned with the large  
14 cross-subsidies that are currently in place in Sprint  
15 and also some of the high access charges, and it needs  
16 to examine whether that's sustainable in light of the  
17 fact that there is a proposal for a stand-alone  
18 company. Those would be two issues that the Staff

19 would like to include and intends to examine in  
20 determining whether the transfer is in the public  
21 interest.

22 JUDGE MOSS: Those issues, I suspect, are in  
23 the bounds of propriety, assuming the Commission  
24 asserts jurisdiction in the matter, and we can  
25 certainly mention those in the prehearing order.

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1 As is typically the case, we don't try to  
2 identify all the issues that might come into a case in  
3 the prehearing order because the nature of our work is  
4 such that issues often come up during the course of the  
5 proceeding, so we don't view that as a limiting factor  
6 nor one that necessitated the proceeding of those  
7 issues if during the discovery process, for example,  
8 you discover that there was no basis upon which the  
9 Staff would advocate.

10 MR. TRAUTMAN: Because they could  
11 specifically pertain to rates, we would like that to be  
12 in the order.

13 JUDGE MOSS: I understood that we are not  
14 talking about the imputation of revenues, a principle  
15 that would be established; is that the idea?

16 MR. TRAUTMAN: It could be the principle.  
17 There could be the principle and the amount. There  
18 could also be a rate impact as a condition of the  
19 merger.

20 MR. HENDRICKS: Your Honor?

21 JUDGE MOSS: Yes, go ahead.

22 MR. HENDRICKS: Just to briefly respond to  
23 what we are talking about on the record today, Sprint  
24 believes that these two issues are beyond the scope of  
25 the Application and what the Commission needs in order

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1 to make a decision on the Application should it assert  
2 jurisdiction.

3 In addition, with respect to publishing  
4 Yellow Pages issue, Sprint continues to believe that  
5 that issue is beyond the scope of the Commission's  
6 jurisdiction based on the peculiar history of Sprint's  
7 Yellow Pages, and so Sprint would further believe that  
8 that issue would be beyond the scope of the proceeding  
9 for that reason as well.

10 JUDGE MOSS: Okay. Sounds to me like we  
11 might need an early round of briefs. Let me ask  
12 Sprint, the alternative request here is an order  
13 declining to assert jurisdiction. Is the idea there  
14 that Sprint would challenge the Commission's  
15 jurisdiction or that Sprint would request that the  
16 Commission waive its jurisdiction?

17 MR. HENDRICKS: I think it would be the  
18 latter.

19 JUDGE MOSS: Mr. Kopta apparently disagrees.

20 MR. KOPTA: Thank you, Your Honor. There has  
21 been a recurring theme in merger dockets --

22 JUDGE MOSS: I seem to recall the GTE/Bell  
23 Atlantic case.

24 MR. KOPTA: But I think we are dealing with a  
25 little bit different situation here. This is not a  
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1 merger. This is actually the opposite of a merger, and  
2 there is some concern still about because this is at  
3 the holding company level, and there are no changes to  
4 the entity that's operating and regulated by this  
5 Commission. Whether the Commission should assert  
6 jurisdiction, we would respectfully ask the Commission  
7 to revisit that particular issue in this particular  
8 proceeding.

9 JUDGE MOSS: So you want to make that  
10 argument out in this case?

11 MR. KOPTA: Yes, Your Honor.

12 MR. TRAUTMAN: Your Honor?

13 JUDGE MOSS: Go ahead.

14 MR. TRAUTMAN: The issues that are raised I  
15 think are legitimate ones. I think they can be dealt  
16 with in the normal course of briefing, as far as not  
17 just the contesting the jurisdiction over the case, but  
18 as to the Yellow Pages, we believe there is  
19 jurisdiction over that as well, but that can be briefed  
20 in the ordinary course of the case, and we would again  
21 argue that it's not beyond the scope of determining  
22 whether it's in the public interest. Those issues can  
23 be determined on the merits by the Commission at a  
24 later time.

25 MR. HENDRICKS: Sprint would agree with that  
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1 last statement. I think the issues can be addressed on  
2 the merits of the case later in the proceeding in the  
3 normal course of briefing.

4 JUDGE MOSS: To get directly to the point,  
5 everybody wants to do one round of briefs?

6 MR. KOPTA: Yes.

7 MR. HENDRICKS: Yes.

8 MR. TRAUTMAN: Yes.

9 JUDGE MOSS: Under the circumstances,  
10 Mr. Trautman, while I will be happy to mention these  
11 issues in the prehearing order, if that is something  
12 you would like me to do, I will qualify that my mention  
13 of them would the fact that they are matters in dispute  
14 as to jurisdiction, and of course the fundamental  
15 jurisdiction issue as well. I can certainly craft all  
16 of that into the prehearing order.

17 Anything else before we get to the schedule?  
18 All right. I understand the parties have had an  
19 opportunity to have some discussion on the schedule but  
20 have not managed to reach results on everything. Do  
21 you have anything written out in terms of what you have  
22 agreed?

23 MR. KOPTA: At the moment, we don't have  
24 something written out that we have agreed. I can  
25 provide you a copy of what Sprint circulated to Staff  
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1 and Public Counsel, and we can talk about that.

2 JUDGE MOSS: Are the other dates going to

3 trigger off the hearing dates in any way?  
4 MR. KOPTA: To a certain extent.  
5 JUDGE MOSS: That's the unresolved issue  
6 then?  
7 MR. KOPTA: Yes, it is.  
8 JUDGE MOSS: Let's talk about hearing dates  
9 then. Mr. Trautman called to inquire what dates might  
10 be available in late February and through March.  
11 MR. TRAUTMAN: No, late January through  
12 February.  
13 JUDGE MOSS: I had some notes on that.  
14 Mr. Trautman, do you recall, I think the week of  
15 January 23rd was available?  
16 MR. TRAUTMAN: I think you had indicated that  
17 almost all of that time was available except for the  
18 week of February 13th, and I don't know if that was the  
19 NARUC conference --  
20 JUDGE MOSS: That is correct. There is a  
21 NARUC conference the week of the 13th. The internal  
22 posture of this docket was asked to schedule this  
23 prehearing conference on an expedited basis, and we did  
24 that on the minimum statutory notice of seven days. I  
25 gather there is an interest in bringing this to a  
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1 relatively speedy conclusion, and my schedule and the  
2 commissioners' schedule will permit that.  
3 So we are in a position to go to hearing as  
4 early as the week of January 23rd, with the exception  
5 of the week of February 13th. So if we have competing  
6 proposals, I should hear them and we will work from  
7 there. Why don't we start with the Company.  
8 MR. HENDRICKS: Your Honor, as you may know  
9 from reading the Application, and we appreciate the  
10 Commission's flexibility in accommodating the schedule,  
11 the transaction proposed is not simply a transaction  
12 that involves a Washington company. It involves  
13 operating companies throughout the nation, and, in  
14 fact, it involves 18 states.  
15 There is some urgency in completing this  
16 transaction. The Company entered into a merger with  
17 Nextel, Sprint and Nextel, which created a large  
18 wireless company and interests within the corporation  
19 of which United and the other local companies are part,  
20 and it has created a need and an urgency to separate  
21 the local company because of the divergent interests of  
22 what are two now really competing companies.  
23 So it's in the Company's interest to do this  
24 as quickly as possible so each company may pursue its  
25 own course in a very competitive telecommunications  
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1 market. Almost all of the states, including some of  
2 Sprint local company's largest states, will be  
3 completing this regulatory state process prior to April  
4 1st, and in some cases, for example, in the state of  
5 Florida, which is one of our largest local states with  
6 a local presence, that case, the Commission will be  
7 entering an order within the next month approving that

8 transaction. That order has been noticed, and many of  
9 the schedules in the other states are also completing  
10 by the end of the year.

11 So this leaves us in a predicament where the  
12 Company will be waiting for approval in Washington, and  
13 so we have requested this expedited schedule and tried  
14 to model it on the schedule that was adopted in the  
15 Verizon case, and it becomes important for the Company  
16 in order to satisfy the operating separation of the two  
17 companies in an efficient and expedient manner to begin  
18 this process and wrap this case up by that April 1st  
19 date, and that is the basis for the schedule we  
20 proposed.

21 There is some limited flexibility in that  
22 proposal. We've spoken with Staff and Public Counsel  
23 and identified some other weeks. We would, of course,  
24 prefer to have this opportunity to have hearings at the  
25 end of January. One compromise we've discussed is to

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1 waive the second round of briefs and schedule the  
2 hearings further out by a week or no more than two  
3 weeks.

4 So we would prefer that the Commission adopt  
5 a schedule that includes hearing dates at the end of  
6 January. We are willing and have offered to make a  
7 compromise with limited briefing to do so a week or two  
8 later than that.

9 JUDGE MOSS: Mr. Trautman?

10 MR. TRAUTMAN: Staff generally does not have  
11 a problem with the suggested evidentiary hearing dates.  
12 If it were moved a week or two later, I would just note  
13 that I have a conflict on February 3rd. I have to do  
14 an oral argument in defense of the Commission's gas  
15 transfer ruling in Superior Court. Any date around  
16 that time would not be helpful for the Staff, but Staff  
17 does not object to the proposed hearing dates.

18 JUDGE MOSS: How about you, Mr. Cromwell?

19 MR. CROMWELL: Once again I fear I have a  
20 conflict. As you are probably aware, the PacifiCorp  
21 rate case hearings are set for January 9th through the  
22 20th. The briefing on the PacifiCorp and American  
23 merger case -- those hearings are set in December -- is  
24 set for January 30th. Then in early February to  
25 February 4th, rebuttal is due in a telecom case, and

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1 then February 13th, PacifiCorp brief is due on the rate  
2 case.

3 So my request would be that the hearing be  
4 set the week of February 13th or thereafter simply  
5 because of the practical matter. It's functionally  
6 difficult to impossible to be effectively prepared for  
7 a hearing on a Monday when two weeks of hearings have  
8 just ended, and unfortunately, given the pace of the  
9 Commission's calendar in both December and January,  
10 there is very little opportunity to try to frontload  
11 preparation that might otherwise be possible.

12 JUDGE MOSS: Is Mr. ffitch similarly occupied



13 through the relevant period?

14 MR. CROMWELL: He's on a call scheduling the  
15 Avista case right now. I don't know his particular  
16 conflicts in the month of January.

17 JUDGE MOSS: Are you referring to the pending  
18 of the Avista rate proceeding?

19 MR. CROMWELL: I believe that is the topic of  
20 the conversation he is having right now.

21 JUDGE MOSS: We already have a schedule in  
22 that case. We are going to hearing on the 17th.

23 MR. CROMWELL: I may be speaking out of turn.  
24 I can't speak to the topic of that conversation other  
25 than I believe it refers to that case.

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1 JUDGE MOSS: Mr. Trautman is here and he  
2 happens to be staff counsel in that case so he's going  
3 to tell me whether I'm inquiring into things I  
4 shouldn't be inquiring into.

5 MR. TRAUTMAN: Mr. Swanson is on that call  
6 too, and I think they are just trying to coordinate  
7 which witnesses will go when and the order of  
8 witnesses, and particularly because Simon had indicated  
9 that he had witnesses from out of state, so logistical.

10 JUDGE MOSS: So it doesn't affect this  
11 January period. Well, we will take the problems into  
12 account, Mr. Cromwell, and I'm sympathetic to your  
13 schedule. I'm not sitting in PacifiCorp, but I am  
14 sitting in Mid American and recognize there is a lot  
15 going on this winter.

16 I think my inclination under the  
17 circumstances, since that week of the 23rd is, in a  
18 manner of speaking, available, and otherwise we would  
19 be looking at least a three-week delay in the schedule,  
20 because the week of the 13th is not available, I think  
21 what I would be inclined to do is go ahead and set the  
22 January date, and then as we get a little closer, there  
23 may be developments in one or another of these cases  
24 that will make it more feasible, and if not, then we  
25 can entertain a motion to, perhaps, adjust the

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1 schedule.

2 The Commission tries to be accommodating in  
3 matters concerning mergers and corporate  
4 reorganizations in terms of the timing recognizing when  
5 there are multijurisdictional concerns not only among  
6 the states but also in federal government. We try to  
7 move with dispatch on these things.

8 I'm trying to underscore the point that we  
9 recognize the need to remain somewhat flexible. The  
10 parties will need to keep that in their minds as well  
11 because of the schedule, and as time passes too, it may  
12 be that either you or Mr. ffitich will have some break  
13 in your schedule, Mr. Cromwell, so we can all sort of  
14 keep in touch on that.

15 Other than that, the schedule looks workable  
16 to me. It calls for a target date order by March the  
17 24th, and I believe the stated goal was to wrap

18 everything up by April 1, so we are pushing up against  
19 that. Some of our flexibility is available. I think I  
20 will set the schedule as tendered here, and I will go  
21 through that in a moment, but it does call for two  
22 rounds of briefs, and it does give us, roughly  
23 speaking, six weeks for an order.

24 We can always consider dispensing with one  
25 round of briefs, and we can also shorten the time the  
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1 Commission will require for an order, and I think that  
2 could even be a matter of some weeks if we need them.  
3 Does that leave you sufficiently comfortable,  
4 Mr. Cromwell?

5 MR. CROMWELL: I wouldn't say sufficiently  
6 comfortable, Your Honor. I had already foreseen a  
7 difficult winter, and trying to put this hearing in  
8 January certainly doesn't improve matters.

9 JUDGE MOSS: Okay. Let's do that, and again,  
10 we'll all maintain our flexibility, and I've suggested  
11 some room there where we might adjust things later, but  
12 this will prompt us all to work diligently through the  
13 holiday season and perhaps be a little more on top of  
14 things than might be ideal relative to our personal  
15 lives.

16 What we will do for the time being is I will  
17 set the schedule for the Staff and Public Counsel  
18 testimony on the 30th of November and the rebuttal on  
19 the 28th of December, cross-exhibits on the 18th, final  
20 prehearing conference, if necessary, on the 20th. We  
21 have typically been able to dispense with those, but we  
22 will see.

23 We will shoot for the 23rd for the  
24 evidentiary hearing. I should mention in connection  
25 with the evidentiary hearing that I need to confirm  
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1 this with the commissioners, and if they have some  
2 independent reason for not wanting to do it, then --  
3 well, we all have bosses. February 10th for  
4 simultaneous opening briefs and February 17th  
5 for simultaneous reply briefs, and again, the target  
6 date for a Commission decision under the schedule would  
7 be the 24th of March.

8 The double-X date is for a settlement  
9 conference, and we have taken to the practice of  
10 scheduling a date for settlement conferences as an  
11 accommodation to our understanding of what our practice  
12 should be to satisfy all segments of the bar, and we  
13 are happy to do that. So I would ask if the parties  
14 have in mind a date on which they would like to  
15 schedule a settlement conference that can be noticed in  
16 the prehearing order, and of course you are free to  
17 change that date among yourselves, but we like to  
18 include that in the order to recognize this.

19 MR. KOPTA: We had discussed that and gotten  
20 as close as the week of November 7th, but I don't think  
21 we ever actually set a date during that week, but  
22 subject to people's availability, we could just pick

23 the 9th for now, and if we need to change it at some  
24 other point during that week, we can do that.

25 JUDGE MOSS: Okay. I'll set November 9th,  
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1 and again, the parties are free to change that. Just  
2 keep us informed, please.

3 MR. KOPTA: We will do that.

4 JUDGE MOSS: Again, this one is a little more  
5 simple in that we just have the three parties. I  
6 apologize I neglected to check how many copies we'll  
7 need for filings. I'll include that information in the  
8 prehearing order. You are all familiar with the  
9 Commission's filing requirements, and I won't bother to  
10 recite those. Is there any other business we need to  
11 conduct today?

12 MR. KOPTA: No, Your Honor.

13 MR. TRAUTMAN: No, Your Honor.

14 MR. CROMWELL: No, Your Honor.

15 JUDGE MOSS: Thank you all. I appreciate  
16 your being here today, and I will get an order out next  
17 week, and I look forward to working with you as the  
18 case goes forward.

19 (Prehearing conference concluded at 2:07 p.m.)  
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