



Investigation Report

Frontier Communications Northwest, Inc.

UT-121925

Rayne Pearson
Consumer Protection

August 2013

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PURPOSE, SCOPE AND AUTHORITY

Purpose

The purpose of this investigation is to determine whether Frontier Communications Northwest, Inc., (Frontier) has committed violations of commission rules related to overcharges for Non-Sufficient Funds or Returned Check fees (NSF fees).

Scope

The scope of this investigation focuses on improper NSF fees assessed by Frontier between August 1, 2010, and March 31, 2012.

Authority

Staff undertakes this investigation pursuant to Revised Code of Washington (RCW) 80.04.070, which grants the commission specific authority to conduct such an investigation.

Staff

Rayne Pearson, Consumer Protection Manager
(360) 664-1103
rpearson@utc.wa.gov

EXECUTIVE SUMMARY

In commission-referred consumer complaint 114021, filed on May 24, 2012, consumer protection staff found that Frontier violated RCW 80.36.130 when it assessed a \$20 NSF fee, which conflicted with company's tariff rate of \$15.¹ Staff determined a broader investigation was necessary to determine the scope and frequency of the improper charges.

An investigation into the business practices of Frontier established that the company is in violation of commission rules and its own tariff, as follows:

- 1,010 violations of RCW 80.36.130 for improperly charging a \$20 NSF fee on 1,010 occasions, for a total of \$5,050 in overcharges.
- 170 violations of RCW 80.36.130 for improperly charging a \$25 NSF fee on 170 occasions, for a total of \$1,700 in overcharges.

During the two-year period of review, Frontier improperly charged 1,180 improper fees, for a total of \$6,750 in overcharges. Frontier credited a refund to 744 of the 1,030 individual accounts that were overcharged on their Nov. and Dec. 2012 billing statements. Of those accounts, 150 were assessed an NSF fee on more than one occasion; 715 of the customers were credited on Nov. 27, 2012. The remaining 315 customers could not be located because they had been disconnected, or had moved out of the company's service area. Of those 315 customers, Frontier was able to locate 29. Credits were issued to those customers on Dec. 3, 2012.

Frontier was unable to determine whether the improper NSF fee resulted from a manual or system-generated error. In March 2012, prior to the date that consumer complaint 114021 was filed, the company completed a billing conversion that stopped the improper NSF fee charges.

Recommendation

Staff recommends the commission issue a penalty of \$100 for each of the 414 violations of RCW 80.36.130 that occurred within the two year period prior to the date of this report, for a total penalty of \$41,400.

Additionally, staff recommends that Frontier closely review this investigation report, which provides detailed technical assistance. Future violations will result in additional penalties.

¹ See attachment A for a copy of the cover page for complaint 114021.

BACKGROUND

Company History

On April 16, 2010, the commission issued final Order 06, in Docket UT-090842.² The commission approved and adopted, subject to conditions, a multiparty settlement agreement that authorized Frontier Communications Corporation to acquire indirect control of Verizon Northwest, Inc. (Verizon). Order 06 stated “The commitments also preserve Commission access to information necessary to perform its regulatory duties...protect customers...The commitments, together with the settlement modifications and additional conditions imposed in this Order, reasonably assure that Frontier Communications Corporation’s proposed acquisition of Verizon Northwest, Inc., will not harm the public interest.” The transaction closed on July 1, 2010.

The company’s 2012 annual report reflects Frontier’s total gross intrastate operating revenue as \$145,775,819. The 2011 annual report shows Frontier’s total gross intrastate operating revenue as \$165,995,732. The company provided 349,617 voice grade lines in 2011 and 332,355 voice grade lines in 2012. Frontier is the second largest landline service provider in Washington state.

Consumer Complaints

According to commission records, consumer protection staff received complaints against Verizon as follows:

Year	Total Number of Complaints
2010	80
2009	188
2008	210
2007	272
2006	258
2005	228

According to commission records, consumer protection staff received complaints against Frontier as follows:

Year	Total Number of Complaints
2012	113
2011	81
2010	75
2009	1

² See attachment B for a copy of the cover of Order 06 issued in Docket UT-090842.

Investigation

Staff initiated this investigation into Frontier's business practices to determine whether the overcharge identified in consumer complaint 114021 was widespread and ongoing. Staff determined a broader investigation was necessary to determine the scope and frequency of the improper charges.

COMPLIANCE HISTORY

2005 Investigation

In 2005, staff began a preliminary investigation prompted by the increasing number of consumer complaints against Verizon. In a number of the complaints reviewed, staff found issues that should have been addressed at the company level but were not, which required consumers to call the commission to resolve routine issues.

Additionally, staff recommended meeting with the company to discuss why complaints had increased, and how it planned to address the underlying issues. Commission staff met with the company to discuss the findings of the Nov. 18, 2005, investigation.

2007 Investigation

In 2007, staff completed an investigation into Verizon's business practices and recommended a penalty of \$372,000 for 372 violations of WAC 480-120-166. Staff believed a significant penalty was appropriate given the ongoing nature of the violations and the extensive technical assistance provided to the company. The commission ultimately approved a settlement agreement between staff and the company, which included a full suspension of the recommended penalty contingent on future compliance. The settlement agreement incorporated a compliance plan to achieve the following goals:

- Decrease the overall number of complaints and violations
- Improve customer service and customer access to Frontier call centers
- Reduce the number of customer complaints regarding the Washington Telephone Assistance Program (WTAP)
- Improve responsiveness to commission-referred complaints.

The parties agreed to conduct and report performance measure comparisons between Nov. 12, 2007, and May 11, 2008.

2009 Investigation

In 2009, staff completed a follow-up investigation into Verizon's business practices that resulted in a formal complaint, Docket UT-090073. The 2009 investigation revealed deficiencies in three areas. First, staff found that despite prior technical assistance, the commission continued to receive a significant number of complaints related to Verizon's customer service. Second, staff found that Verizon consistently failed to properly process WTAP applications. Third, staff found that Verizon was improperly billing city taxes to customers with service in unincorporated areas. Staff recommended a total penalty of \$107,800.

On Sept. 10, 2009, the commission adopted a settlement agreement between the parties. As part of the settlement agreement, Frontier agreed to:

- Admit to 425 violations for improperly assessing city taxes.

- Admit to 47 violations for improperly charging customers for WTAP.
- Pay a \$2,600 penalty for its incorrect assessment of city tax rates, with an additional \$39,900 penalty suspended pending a follow-up investigation.
- Pay \$37,000 penalty for its violations of WTAP procedures, and pay \$10,000 to a WTAP outreach program.
- Provide staff with documentation of measures it agreed to take to improve the city tax assessment and the WTAP application processes.
- Cooperate with staff's follow-up investigation six months from the effective date of the settlement agreement to determine compliance with WTAP charges and city tax charges.

Staff conducted a follow-up investigation in March 2010, as required by the commission's order approving the settlement agreement, and completed its report on April 26, 2010. In light of staff's findings, the commission waived the penalty suspended in Order 02.

INVESTIGATION

Data Request

On Sept. 6, 2012, staff requested the following data from Frontier:

- A list of all customers in Washington state who were charged a fee for having non-sufficient funds (NSF) from June 30, 2010, through June 30, 2012.
- In an Excel spreadsheet, for each customer listed ... the customer's name, account number, NSF fee amount and the date the fee was charged. Include information for customers with multiple NSF charges.
- The name, title, telephone number, and email address of the Frontier contact person that our staff can work with directly for questions that may arise concerning any details of the data.

Staff requested that Frontier respond to the data request no later than Sept. 20, 2012.³ On Sept. 14, staff received an email from Carl Gipson, Manager, requesting an extension to produce the data requested. Mr. Gipson stated, "...obtaining records from June 30, 2012, through January 2011 [sic] will require an extensive amount of data gathering..." Staff granted an extension until Oct. 4.

On Oct. 4, Mr. Gipson provided an Excel spreadsheet with all of the requested information.

On Oct. 18, staff sent the company the following additional questions:

- On the spreadsheet provided October 4, 2012, there are numbers in the "Amount" column in red. What is the difference between the numbers in red and the numbers in black? Are the numbers in red a credit provided to the customer?
- Frontier Communications Northwest Inc.'s tariff for Washington state allows Frontier to charge \$15 for returned check fees. Why are there charges on your spreadsheet for returned check fees other than \$15?

On Oct. 26, Frontier responded with the following information:

- The numbers in red are credits back to the customer.
- The non-\$15 charges coded as NSF were applied prior to the billing system conversion and were manually applied to customer accounts. Therefore a review of these charges is being made on an account by account basis. Generally, the charges for \$20 or \$25 are for NSF but appear to have been billed at an incorrect rate. Frontier is planning to issue a credit for the difference between the \$20/\$25 charges and the tariffed rate of \$15. The charges for amounts other than \$15, \$20 or \$25 are NSF related but have been incorrectly coded as NSF fees. These amounts are appropriate charges to bill back the amount of the "bad checks" and not the NSF fee itself. The amounts for multiples of \$15 (e.g., \$30, \$45) are for charges for multiple returned checks.

³ See Attachment C for a copy of the data request sent to Frontier on September 6, 2012.

On Oct. 26, staff sent the company the following questions:

- What were accounts 1098702964 (\$15), 1063546347 (\$20) and 1021401286 (\$96) credited for?
- When did the billing system conversion take place?
- Provide me with a total amount of accounts Frontier plans to issue credits for.
- Provide the total amount of credits that will be issued.
- Provide me with a date, when Frontier plans to issue the credits.
- Explain specifically what Frontier means by “NSF related.”

On Nov. 9, Frontier responded with the following information:

- These were adjustments not related to NSF charges that were coded incorrectly as NSF charges.
- The billing conversion occurred on March 1, 2012
- Credits will be issued to 1,180 accounts
- The credits total \$6,750
- The credits will be issued no later than the first billing cycle in December 2012.
- The original statement provided by Frontier was “The charges for amounts other than \$15, \$20 or \$25 are NSF related but have been incorrectly coded as NSF fees.” The proper statement should have been “The charges for amounts other than \$15, \$20 or \$25 are for miscellaneous adjustments that were incorrectly coded as NSF fees.”

In addition, Frontier provided an Excel spreadsheet that listed customer account numbers, first name, last name, billing dates, amount charged, and the refund amounts. The refunds totaled \$6,750.⁴

On Dec. 19, commission staff requested clarifying information about the reason for the improper NSF fee: “Please confirm the following information is accurate: August 2010 – the 1st NSF Fee overcharge was applied to customer account 1064712894, as a result of a Verizon employee manually applying the NSF Fee charges to that account.”

On Dec. 21, Frontier responded by stating, “It cannot be determined whether this charge was manually applied. In either case, whether it was system generated or manually applied, the overbilling of these charges began in August 2010.”

Scope of Investigation

Staff used the documents and information furnished from the original data request, all of the subsequent responses from Frontier, Frontier’s tariff, and commission records to conduct this investigation.

⁴ See attachment D for a copy of the excel spreadsheet Frontier provided on November 9, 2012. Staff redacted customer names.

NSF FEE

Investigation

RCW 80.36.130 requires that no telecommunications company “Shall charge, demand, collect or receive different compensation for any service rendered or to be rendered than the charge applicable to such service as specified in its schedule on file and in effect at that time....”

On May 24, 2012, consumer protection complaint staff opened complaint number 114021 for Kenneth Hoeck. Mr. Hoeck was denied the WTAP discount when his service began, although complaint staff later determined he was eligible. In addition, Mr. Hoeck was charged \$20 for a NSF fee.

On June 8, 2012, consumer protection staff informed Frontier that Mr. Hoeck was charged a \$20 NSF fee in violation of the company’s tariff, which allows a \$15 charge. One violation of RCW 80.36.130 was recorded, and a summary of that violation was provided to Frontier.

On June 12, 2012, Frontier issued a credit of \$5 for the overcharge related to the improper NSF fee. In its response, the company stated that, “Frontier regrets this error.” Frontier, however, did not investigate whether other accounts were charged improper NSF fees, and consumer protection staff did not instruct the company to investigate the error further. It was only in response to the commission’s data request that the company discovered that it had assessed an additional 1,179 improper NSF fees.

Staff reviewed the data Frontier provided and found that 1,010 accounts were improperly charged a \$20 NSF fee, and 170 accounts were improperly charged a \$25 NSF fee, resulting in \$6,750 in overcharges. A total of 4,236 accounts were charged an NSF fee during the review period; roughly 28 percent of the accounts were charged incorrectly.

In its Oct. 26 response to the commission’s data request, Frontier stated that the non-\$15 charges coded as “NSF fees” were manually applied to customer accounts prior to the company’s billing system conversion. In addition, the company stated that it planned to issue credits for the incorrect charges no later than the first billing cycle in December 2012.

Findings

Staff finds that Frontier violated RCW 80.36.130 a total of 1,180 times by charging non-tariffed rates for NSF fees in conflict with those published in the company’s general and local exchange tariff WN U-17, Section 5, Original Sheet 7. Frontier received technical assistance in June 2012 through consumer complaint 114021. Although the error appears to be unintentional, but for the consumer complaint, the commission would not have known about the violation and Frontier would have profited from the improper charge.

RECOMMENDATION

Penalty

In its investigation, staff documented 1,180 violations of RCW 80.36.130 and the company's own tariff resulting from an overcharge of NSF fees assessed between Aug. 2010 and March 2012.

Staff typically recommends a "per violation" penalty against a regulated company where the violations result in serious customer harm; for repeat violations of a rule after a company receives technical assistance from staff; or for intentional violations of commission laws or rules. The commission also has the authority to assess penalties of up to \$1,000 per violation, per day following a formal complaint and hearing.⁵

In this case, staff recommends penalties of \$100 for each of the 414 violations of RCW 80.36.130 that occurred within the two year period prior to the date of this report. Staff considered the following factors to determine the recommended penalty amount.

1. How serious or harmful the violation is to the public.

Staff believes the violations caused serious harm to consumers. Frontier customers who were unable to pay their bill due to insufficient funds were assessed charges in excess of the tariff rate. Customers who receive NSF fees presumably do not have any additional funds to provide to the company.⁶

2. Whether the violation is intentional.

Staff does not believe the evidence supports a finding that the violation was intentional.

3. Whether the company self-reported the violation.

The violations occurred between Aug. 2010 and March 2012. Staff received a complaint in May 2012 and discovered the NSF fee overcharge. Staff recorded a violation and informed Frontier's complaint staff that the company charged an NSF fee in excess of the tariff rate. The company refunded the overcharge to the individual who filed the complaint. The company did not, on its own initiative, investigate the overcharge to determine whether it was widespread and ongoing. Frontier reports that it first became aware of the violations when it received the commission's data request in June. Staff does not believe the evidence supports a finding that Frontier self-reported the violation.

⁵ RCW 81.04.380 allows the commission to assess a penalty of up to \$1,000 for each violation after hearing.

⁶ RCW 81.04.405 allows the commission to assess an administrative penalty for any violation by a regulated company of a statute, rule, the company's own tariff or an order of the commission.

4. Whether the company was cooperative and responsive.

Staff believes that the company has been cooperative, and has responded timely to staff requests for information.

5. Whether the company promptly corrected the violations and remedied the impacts.

Of the 1,180 total accounts, there were a total of 1,030 individual customer accounts. (150 accounts were assessed an NSF fee on more than one occasion). Of those, 715 were credited on Nov. 27, 2012; 315 customers could not be located because they had been disconnected or moved out of the service area. Frontier was able to locate 29 of those customers and issue a credit. Frontier completed a billing system conversion in March 2012, which stopped the overcharges from occurring. Staff believes the company promptly corrected the violations and minimized their impact by providing refunds in advance of the penalty assessment.

6. The number of violations and the number of customers affected.

1,030 customers were affected a total of 1,180 times (150 accounts were affected multiple times). Staff believes this the number of affected customers – 1,030, representing 28 percent of customers who were charged an NSF fee – is significant, but not substantial.

7. The likelihood of recurrence.

Staff does not believe this same violation will reoccur because the company completed a billing system conversion that resolved the issue.

8. The company's past performance regarding compliance, violations and penalties.

In 2005, the company had a large number of violations, which prompted an investigation. Staff found issues that should have been addressed at the company level, but were not. Staff met with the company to discuss its findings.

In 2007, staff conducted an investigation into the company's business practices and recommended a penalty of \$372,000 for 372 violations of WAC 480-120-166. Staff believed a large penalty was appropriate due to the ongoing nature of the violations. The commission approved a settlement agreement, which included a full suspension of the recommended penalty contingent on future compliance.

In 2009, staff completed a follow-up investigation into the company's business practices that resulted in a formal complaint, Docket UT-090073. Staff found that despite prior technical assistance the company failed to achieve compliance, and recommended a total penalty of \$107,800. The parties reached a settlement, and the company paid penalties of \$2,600 for

incorrect city tax charges, and \$37,000 for violations of WTAP rules. It also paid \$10,000 to a WTAP outreach program. The company was instructed to cooperate with staff's follow-up investigation six months from the settlement agreement. The remaining penalty was waived.

9. The company's existing compliance program.

The company has received violations in the past for charging customers an incorrect rate for city taxes. In Docket UT-090073, the commission approved a settlement agreement that included a plan to implement a compliance program to avoid any future, similar violations. On April 26, 2010, commission staff conducted a follow-up investigation and found it to be in substantial compliance; a notice was issued waiving the remaining suspended penalty. It appears, however, that any compliance program the company has in place failed to identify this particular error. The company may have never known about the error but for the violation recorded by consumer protection staff in the course of investigating consumer complaint 114021.

10. The size of the company.

Frontier provided 349,617 voice grade lines in 2011 and 332,355 voice grade lines in 2012. The company reported gross intrastate operating revenue of \$145,775,819 for 2012.

Recommendation

Staff recommends the commission issue a penalty assessment of \$100 for each of the 414 violations of RCW 80.36.130 that occurred within the two year period prior to the date of this report, for a total penalty of \$41,400.

Additionally, staff recommends that Frontier closely review this investigation report, which provides detailed technical assistance. Future violations will result in additional penalties.

Attachment A

Consumer Complaint		Frontier Communications Northwest, Inc.	114021
Customer Info			
Customer:	Kenneth Haack	Primary Phone:	(360) 240-9066
Contact:		Other Phone:	
eMail Address:		Fax:	
Privacy Confidential:	<input type="checkbox"/> Yes		
Address			
Service Address: 150 NE 7th Ave #26		Mailing Address:	
City, State, Zip:	Oak Harbor, WA 98277	City, State, Zip:	, WA
County:			
Complaint Info			
Class of Service:	<input checked="" type="radio"/> Residential <input type="radio"/> Business		
Complaint Group:	Disconnect Lookup	Complaint Keyword:	(None)
Company ID:	Frontier Communications Northwest, Inc.	Account Number:	360-240-9066-121311-5
T6095		Status: Closed as of:	06/27/2012
Company Rep:	Veronica Dodson	Initially Opened on:	05/24/2012
Rep Email Address:		Quality Review:	<input type="checkbox"/> Done
Agency Rep:	Jennifer Whealy	Closed on:	06/27/2012
Disputed Amount:	176	Referral:	
Contacted How?	phone		
Complaint Description:	<p>Urgent</p> <p>Customer called to sign up for WTAP as he qualifies for the program. Customer states he only wanted basic service, but has been receiving large bills for services he states he did not sign up for. Customer does not want any extra services as he can't afford them. Customer is requesting bill for \$8 plus taxes and fees. Customer paid \$50.00 by check for connection of service. Customer is now \$176.00 overdue threatened with disconnect.</p> <p>5/24/12 Passed to Frontier Via e-mail - Urgent. Response due 5/31/2012.</p>		
Results:	<p>Company was not in compliance with WTAP rules. Company reversed initial connection charges and gave proper credits for WTAP for customer account dating back to December, 2011, to current. Customer's check for \$43.25 payment was returned for non sufficient funds and was not applied to the account.</p> <p>Violations (6)</p>		
Closure Status			
Disposition:	Consumer upheld	Company Profile:	
Amount Saved:	\$103.83	Violation(s):	80.36.420 (3)(c) 1, 80.36.130 1, WAC 480-120-166(8) 2, WAC 480-120-166(8) 1, 80.36.460 1
Categories			
Industry:	170 - Telecommunications	Docket Number:	

This document can be read by all users of the database

Attachment B

[Service Date April 16, 2010]

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of)	DOCKET UT-090842
)	
VERIZON COMMUNICATIONS,)	
INC., and FRONTIER)	ORDER 06
COMMUNICATIONS)	
CORPORATION)	
)	FINAL ORDER APPROVING AND
For an Order Declining to Assert)	ADOPTING, SUBJECT TO
Jurisdiction Over, or, in the Alternative,)	CONDITIONS, MULTIPARTY
Approving the Indirect Transfer of)	SETTLEMENT AGREEMENTS AND
Control of Verizon Northwest, Inc.)	AUTHORIZING TRANSACTION
)	
.....)	

Synopsis: The Washington Utilities and Transportation Commission approves and adopts, subject to conditions, five multiparty settlement agreements proposed by all parties, except Public Counsel and the Broadband Communications Association of Washington, and authorizes Frontier Communications Corporation to acquire indirect control of Verizon Northwest, Inc. The five agreements include commitments to ensure a smooth transition to replicated back-office and operations support systems, expand access to broadband service, and protect the financial integrity of Washington operations. The commitments also preserve Commission access to information necessary to perform its regulatory duties, protect service quality to retail and wholesale customers, protect customers, including low-income customers, from rate impacts, and preserve service offerings. The commitments, together with the settlement modifications and additional conditions imposed in this Order, reasonably assure that Frontier Communications Corporation's proposed acquisition of Verizon Northwest, Inc., will not harm the public interest.

Attachment C



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

September 6, 2012

Carl Gipson, State Manager
Frontier Communications Northwest, Inc.
1800 41st Street
Everett, WA 98201

RE: Data Request

Dear Mr. Gipson:

The Utilities and Transportation Commission is conducting an investigation into the accounting practices of Frontier Communications Northwest, Inc. (Frontier).

Under Washington State law (Revised Code of Washington 81.04.070), the Utilities and Transportation Commission has the right to inspect the accounts, books, papers and documents of any regulated telecommunications company doing business in this state.

As part of a Staff review of your telecommunications company, please send us the following information and documents:

1. A list of all customers in Washington state who were charged a fee for having non-sufficient funds (NSF) from June 30, 2010 through June 30, 2012.
2. In an Excel spreadsheet, for each customer listed, please provide the customer's name, account number, NSF fee amount and the date the fee was charged. Include information for customers with multiple NSF charges.
3. The name, title, telephone number, and email address of the Frontier contact person that our Staff can work with directly for questions that may arise concerning any details of the data.

You are required to furnish the above requested documents to Commission Staff by no later than 5:00 p.m. on September 20, 2012. Please attach a copy of this letter to the documents for reference.



Mr. Carl Gipson
September 6, 2012
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If you have any questions about this request, you may contact Mathew Perkinson, Compliance Investigator. Mr. Perkinson can be reached at (360) 664-1105 or at mperkinson@utc.wa.gov.

Sincerely,



David W. Danner
Executive Director and Secretary

Attachment D

Customer Acct Number	Bill Date	Amount	Refund Amount				
				3907030842	09/10/10	\$25	\$10
				1021621226	09/13/10	\$20	\$5
1064712894	08/01/10	\$20	\$5	1046997831	09/13/10	\$20	\$5
3939015938	08/01/10	\$25	\$10	1072580102	09/13/10	\$20	\$5
1031519637	08/07/10	\$20	\$5	3903018296	09/13/10	\$25	\$10
1058483188	08/07/10	\$20	\$5	1034413767	09/16/10	\$20	\$5
1037422120	08/10/10	\$20	\$5	1039611231	09/16/10	\$20	\$5
1015705189	08/13/10	\$20	\$5	1068604515	09/16/10	\$20	\$5
1046981730	08/13/10	\$20	\$5	1002940478	09/19/10	\$20	\$5
1063578558	08/13/10	\$20	\$5	1015588840	09/19/10	\$20	\$5
1028412789	08/16/10	\$20	\$5	1017534306	09/19/10	\$20	\$5
1037452216	08/16/10	\$20	\$5	1037413602	09/19/10	\$20	\$5
1013573374	08/19/10	\$20	\$5	1044420006	09/19/10	\$20	\$5
1030596990	08/19/10	\$20	\$5	1054444625	09/19/10	\$20	\$5
1013937724	08/22/10	\$20	\$5	1061775070	09/19/10	\$20	\$5
1051551943	08/28/10	\$20	\$5	1096639165	09/19/10	\$20	\$5
1065936117	08/28/10	\$20	\$5	1096639165	09/19/10	\$20	\$5
1067496131	08/28/10	\$20	\$5	1017497311	09/22/10	\$20	\$5
1091567540	08/28/10	\$20	\$5	1022697528	09/22/10	\$20	\$5
1091567540	08/28/10	\$20	\$5	1068607689	09/22/10	\$20	\$5
1092535668	08/28/10	\$20	\$5	1091412378	09/22/10	\$20	\$5
3929000256	08/28/10	\$25	\$10	1089405212	09/25/10	\$20	\$5
1026939585	09/01/10	\$20	\$5	1011758210	09/28/10	\$20	\$5
1069771589	09/01/10	\$20	\$5	1047535247	09/28/10	\$20	\$5
1078616078	09/01/10	\$20	\$5	1070491552	09/28/10	\$20	\$5
1048594085	09/04/10	\$20	\$5	1088571697	09/28/10	\$20	\$5
1048594085	09/04/10	\$20	\$5	1095570006	09/28/10	\$20	\$5
3913009966	09/04/10	\$25	\$10	1019580438	10/01/10	\$20	\$5
3970006148	09/04/10	\$25	\$10	1019580438	10/01/10	\$20	\$5
1024639835	09/07/10	\$20	\$5	1019580438	10/01/10	\$20	\$5
1086797388	09/07/10	\$20	\$5	1058586653	10/01/10	\$20	\$5
1037699343	09/10/10	\$20	\$5	1004982186	10/07/10	\$20	\$5
1091999813	09/10/10	\$20	\$5	1011509474	10/07/10	\$20	\$5

1036911845	10/07/10	\$20	\$5	1022681478	10/28/10	\$20	\$5
1044468866	10/07/10	\$20	\$5	1037402629	10/28/10	\$20	\$5
1083901168	10/07/10	\$20	\$5	1038409756	10/28/10	\$20	\$5
3995001718	10/07/10	\$25	\$10	1052400950	10/28/10	\$20	\$5
1022504223	10/10/10	\$20	\$5	1068401584	10/28/10	\$20	\$5
1074636058	10/10/10	\$20	\$5	1010461885	11/01/10	\$20	\$5
3987004846	10/10/10	\$25	\$10	1023487632	11/01/10	\$20	\$5
3988056987	10/10/10	\$25	\$10	1027449787	11/01/10	\$20	\$5
1019752068	10/13/10	\$20	\$5	1046723294	11/01/10	\$20	\$5
1021621226	10/13/10	\$20	\$5	1079440772	11/01/10	\$20	\$5
1022420933	10/13/10	\$20	\$5	1088591761	11/01/10	\$20	\$5
1034623877	10/13/10	\$20	\$5	1091468991	11/01/10	\$20	\$5
1095558235	10/13/10	\$20	\$5	3936034818	11/01/10	\$25	\$10
3936058660	10/13/10	\$25	\$10	3947056435	11/01/10	\$25	\$10
3992037703	10/13/10	\$25	\$10	1022416823	11/04/10	\$20	\$5
1039611231	10/16/10	\$20	\$5	1035578042	11/04/10	\$20	\$5
3906031195	10/16/10	\$25	\$10	1047468558	11/04/10	\$20	\$5
3907034147	10/16/10	\$25	\$10	1000488374	11/07/10	\$20	\$5
3957008018	10/16/10	\$25	\$10	1016518609	11/07/10	\$20	\$5
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