

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Development of local exchange) DOCKET NO. 900633-TL
company cost of service study methodology) ORDER NO. 25310
_____) ISSUED: 11-07-91

ORDER GRANTING IN PART AND DENYING IN PART
THE CONFIDENTIAL TREATMENT OF
DOCUMENTS NOS. 0752-91 and 1044-91

I. BACKGROUND

On February 1, 1991, Southern Bell Telephone and Telegraph Company (Southern Bell or the Company) filed its Request for Confidential Classification and Motion for a Permanent Protective Order (Request) for material included in the Company's response to the Commission Staff's First Set of Data Requests in Docket No. 900633-TL, which was served on the Company on December 7, 1990. The material at issue involves details of the Company's computer cost models. The Commission has assigned the material Document No. 0752-91, under the Company's January 11, 1991, Notice of Intent to Request Specified Confidential Classification, and Document No. 1044-91, under the Company's Request. This Order resolves the confidentiality of both documents.

In support of its Request, the Company proffers four arguments which it applies to an index of the material at issue, through the use of a chart. The arguments are included as Attachment I to this Order. The chart which indexes the material and applies the Company's arguments is included as Attachment II to this Order.

II. DOCUMENT ANALYSIS

There is a presumption in the law of the State of Florida that documents submitted to governmental agencies shall be public records. The only exceptions to this presumption are the specific statutory exemptions provided in the law and exemptions granted by governmental agencies pursuant to the specific terms of a statutory provision. This presumption is based on the concept that government should operate in the "sunshine." It is this Commission's view that the burden to be met by one requesting specified confidential classification of documents submitted during a proceeding before us is very high. The Company may fulfill its burden by demonstrating that the documents fall into one of the statutory examples set out in Section 364.183, Florida Statutes, or by demonstrating that the information is proprietary confidential information, the disclosure of which will cause the Company or its ratepayers harm.

DOCUMENT NUMBER-DATE

11090 NOV-7 1991

FPSC-RECORDS/REPORTING

Among other arguments, the Company raised Sections 364.183(a) and (d), Florida Statutes (1990), in support of the confidentiality of the material at issue. These sections exempt "[t]rade secrets" and "[i]nformation concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms."

Chapter 688, Florida Statutes is the Uniform Trade Secret Act. Section 688.002(4) states that:

"Trade secret" means information . . . that
(a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and
(b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

Chapter 812, Florida Statutes addresses Theft, Robbery, and Related Crimes. Section 812.081(1)(c) states that ". . . a trade secret is considered to be: 1. Secret; 2. Of value; 3. For use or in use by the business; and 4. Of advantage to the business, or providing an opportunity to obtain an advantage, over those who do not know or use it when the owner thereof takes measures to prevent it from becoming available to persons other than those selected by the owner to have access thereto for limited purposes."

Upon examination of the materials and the applicable law, I have concluded that, with the exception of the Company's Request regarding Item 10, Attachment A and Item 12a, Attachment B, the information at issue does not meet the burdens set forth in the statutes. I find that the disclosures at issue will not harm the Company's ability to contract to any perceptible degree, and that Bell's competitors will derive no perceptible economic advantage from such disclosures.

Item 2b, Attachment B

The documents provided consist of hard copies of spreadsheets developed and used by BellSouth Services to generate administrative expense factors for use in incremental cost studies. Two sets of printouts were provided: one is a direct printout of the file (without any values), provided in response to 2b as Attachment A;

one shows the underlying formulas in the spreadsheet, provided as Attachment B to Item 2b.

The Company asserts that all of the actual formulas should be treated as confidential because: they constitute trade secrets; Bell's competitors could obtain economic value from their disclosure; and their public disclosure could result in the dilution or elimination of their value, both internally and externally. See Attachment I of this Order, Argument Number 2.

Upon review, I find that these materials are not trade secrets and do not warrant confidential treatment. Numerous other LECs produce similar maintenance factors for use in their cost studies. Moreover, Southern Bell previously has described, in public forums and on various occasions, the basic approach it follows. Public disclosure should not dilute the material's value internally, while its external value would be diminished only slightly in that Southern Bell might be limited in its ability to resell its methodology. Since material is structured according to Bell's unique accounting system and therefore is not readily marketable to other LECs, I find the diminution in external value to be de minimus. Additionally, I find that Bell's competitors will derive no perceptible economic advantage from disclosure of this information.

Item 3, Attachment A

This document is a blank worksheet which contains neither values nor results. The material illustrates how various components are summarized to yield the composite annual cost factors used in certain cost studies. In other words, this worksheet merely takes results from other analyses and sums them. Fundamentally, the additive process shown is conceptually identical to that described in Chapter 8 of the Florida Private Line/Special Access Cost Study Manual. Southern Bell asserts that the material constitutes confidential information. See Attachment I of this Order, Argument Number 2. Upon review, I find that this material does not rise to the level of a trade secret. It shall not be afforded confidential treatment.

Item 3, Attachment B

This material is analogous to that found in Item 2b, Attachment B, which is discussed above. It shows the underlying formula related to Item 3, Attachment A. Southern Bell considers those entries in this work paper which show a formula to be confidential. See Attachment I of this Order, Argument Number 2. Upon review, I find that this material shall not be held confidential. I note that computations of a similar nature are discussed at length in Chapter 8 of the Florida Private Line/Special Access Cost Study Manual.

Item 6b, Attachment A

Like Item 3, Attachment A, this material is a blank worksheet used for developing a miscellaneous common equipment and power factor. The Company's argument for confidential treatment is found at Attachment I of this Order, Argument Number 2. The Company considers only the annotations of the computations to be performed to be confidential. Although there may be some limited value regarding the three formula which the Company considers to be proprietary, of greater usefulness is the indication of what types of data should be used to compute such a factor --- which the Company does not consider to be confidential. Upon review, I find that, under the circumstances, the specific information at issue is not a trade secret and that it does not warrant confidential treatment.

Item 6b, Attachment B

This material illustrates the underlying formula associated with Item 6b, Attachment A; the Company considers the actual formula corresponding to the annotations in Attachment A to be confidential. The Company's argument for confidentiality is found at Attachment I of this Order, Argument Number 2. Upon review, consistent with my decision regarding Item 6b, Attachment A, I find that it is not a trade secret and that it does not warrant confidential treatment.

Item 10, Attachment A

This item consists of what appears to be the user manual for Local Exchange Usage Costs (LEUC), a PC-based program which develops incremental usage costs. The Company's arguments for

confidential treatment of the material are found at Attachment I of this Order, Argument Number 1. The entries considered by Southern Bell to be proprietary generally relate to descriptions of the actual algorithms used within the program to yield incremental usage costs. Upon review, I find that this material requested by Southern Bell shall be afforded confidential treatment. The material is unique to Southern Bell and appears to be a trade secret. However, should Bell subsequently request that the Commission endorse this specific approach to deriving incremental local usage costs, then detailed descriptions of the specific computations may need to be made public.

Item 12a, Attachment B

This material consists of printouts which include the spreadsheet formulas used to derive maintenance factors for use in incremental cost studies. The Company's argument for confidential treatment is found at Attachment I of this Order, Argument Number 2. The Company does not consider a narrative description which specifies the sequence of steps required to generate maintenance factors to be confidential. However, in an abundance of caution I will grant the requested confidential treatment of the detailed cell-by-cell formulas in the worksheets actually used by the Company to generate these factors.

Item 16d, Attachment A

This material consists of a sample output report from Switching Cost Information System (SCIS), a BellCore program used by many LECs to derive switching usage costs. Southern Bell's argument for confidential treatment of this material is found at Attachment I of this Order, Argument Number 3.

The output report provided by the Company is clearly labeled: "Note: These numbers are for illustrative purposes and do not reflect any actual office results." I find that this statement vitiates the Company's claims for confidential treatment. No vendor-specific prices are revealed in this report; to the extent that they are reflected in the outputs, they are so aggregated as to be useless. Furthermore, they are based upon "illustrative" inputs. The Company's argument that disclosure of this information would impair its ability to contract for goods or services on

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favorable terms is not persuasive. I find that the material at issue is not entitled to confidential treatment.

Item 16f, Attachment A

This material consists of a sample SCIS input form for a 5ESS switch. The material clearly states: "These numbers are for illustrative purposes only and do not reflect any actual office results." Southern Bell's arguments for confidentiality of this material is found at Attachment I of this Order, Argument Number 4. Southern Bell appears to claim that the inputs on the form indirectly reflect switch-specific engineering rules that are governed by nondisclosure agreements between the vendor and Southern Bell. However, the values are merely illustrative. Moreover, the structure of the input entries shown on the form is sufficiently cryptic to not reveal any actual switch-specific engineering formula. Southern Bell also contends that this item reflects projected demand for its services. Given the disclaimer on the document provided, I find that this claim is unfounded. I reject the Company's argument that disclosure of the information would impair its ability to contract on favorable terms, and also the Company's argument that the material constitutes a trade secret. Thus, I find that the material at issue is not entitled to confidential treatment.


Based upon the foregoing it is

ORDERED by Commissioner J. Terry Deason, as Prehearing Officer, that the requested material in Item 10, Attachment A and Item 12a, Attachment B included in documents numbered 1044-91 and 0752-91 shall be held confidential for the reasons set forth above. It is further

ORDERED that all other material for which Southern Bell has requested confidential treatment is held to be not entitled to confidential treatment.

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By ORDER of Commissioner J. Terry Deason, as Prehearing Officer, this 7th day of NOVEMBER, 1991.



J. TERRY DEASON, Commissioner
and Prehearing Officer

(S E A L)

CWM/TH

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: 1) reconsideration within 10 days pursuant to Rule 25-22.038(2), Florida Administrative Code, if issued by a Prehearing Officer; 2) reconsideration within 15 days pursuant to Rule 25-22.060, Florida Administrative Code, if issued by the Commission; or 3) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or sewer utility. A motion for reconsideration shall be filed with the Director, Division of Records and Reporting, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be

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requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

SUMMARY OF CONFIDENTIAL MATERIAL AND
LIST OF REASONS WHY SPECIFIED MATERIALS ARE PROPRIETARY

1. This documentation contains information including algorithms which have been developed internally by Southern Bell at considerable time and expense and which are not readily ascertainable by Southern Bell's competitors who could obtain economic value from its disclosure. Southern Bell considers this information highly confidential and valuable business information which is not disclosed outside of Southern Bell and its affiliates. Consequently, these algorithms constitute trade secrets which are expressly deemed to be proprietary confidential business information pursuant to Section 364.183, Florida Statutes, and which are exempt from the Open Records Act. The disclosure of this information publicly could lead to the dilution or elimination of its value, both internally as well as externally.
2. The algorithms in the Symphony files were developed and are used internally by Southern Bell's affiliate, BellSouth Services ("BSS"), in support of the Operating Companies. Substantial effort both in terms of time and money was involved in creating these algorithms which are not readily ascertainable by Southern Bell's competitors who could obtain economic value from its disclosure. This information is highly confidential and valuable business information which is not disclosed outside of Southern Bell and its affiliates. Consequently, these algorithms constitute trade secrets which are expressly deemed to be proprietary confidential business information pursuant to Section 364.183, Florida Statutes and which are exempt from the Open Records Act. The disclosure of this information publicly could lead to the dilution or elimination of its value, both internally as well as externally.
3. This information reflects the results of the SCIS program. SCIS models the actual engineering decisions made in building a central office switch. The formulas are specific to each central office switch vendor and include information covered by proprietary agreements between BellCore and the switch vendors. In fact, the fundamental formulas used in the model are considered by BellCore to be the intellectual property of BellCore and are not disclosed to Southern Bell and its affiliates.

The prices, reflected in the outputs, which Southern Bell and its affiliates pay for central office hardware are covered by non-disclosure agreements. Therefore, if these prices were disclosed, Southern Bell and its affiliates would violate the non-disclosure agreements. Also, this information reflects vendor specific pricing and discounts which Southern Bell and

its affiliates obtain for equipment. Public disclosure of this information would impair Southern Bell's ability to contract for goods and/or services on favorable terms. Therefore, such information is classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

4. The engineering data used as inputs into the SCIS reflect the culmination of historical trends, realistic estimates of future equipment needs, and is used to monitor customer services on an ongoing basis. Engineering data consists of engineering rules for provisioning central office equipment. This data is provided by the equipment vendor and is covered by non-disclosure agreements between the vendor and Southern Bell and its affiliates. Our vendor would be reluctant to provide this information to Southern Bell so that Southern Bell can begin its network and marketing plans if our vendor knew this information would be made available to its competitors. Thus, public disclosure would impair Southern Bell's ability to contract for goods and/or services on favorable terms. Therefore, such information is classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

Also, this information reflects projected demand for Southern Bell service. If this information were given to a competitor he would know how much growth Southern Bell expects, thus telling the competitor he too should begin offering this service. This information is valuable, and is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT II

<u>Item No.</u>	<u>Attachment</u>	<u>Page No.</u>	<u>Line No.</u>	<u>Description</u>	<u>Reference</u>
2b	B	15	23; 31-36; 39-44	DATA	2
2b	B	16	8-13; 16-21; 33; 41-46; 49-54	DATA	2
2b	B	17	18-23; 26-31; 43; 51-56	DATA	2
2b	B	18	3-8; 14-18; 22-26; 29	DATA	2
2b	B	26	47-52; 55-56	DATA	2
2b	B	27	1-4; 7-12; 15-20; 26-31 34-39; 42-47; 50-55	DATA	2
2b	B	28	13-18; 31-36; 51-56	DATA	2
2b	B	29	5-10; 14-19; 23-28; 33-38; 42-47; 52-56	DATA	2
2b	B	30	1; 5-10; 14-19; 23-28; 30	DATA	2
2b	B	31	32-37; 41-46; 50-55 3-8; 35-40; 43-48; 51-56	DATA	2
2b	B	32	3-8; 14-19; 22-27; 30-35; 38-43	DATA	2
2b	B	33	22-27; 32-37	DATA	2
2b	B	34	33-38	DATA	2
2b	B	35	4-9; 49-54	DATA	2
2b	B	36	32-37; 51-56	DATA	2
2b	B	37	3-8; 11-16; 19-24; 30-35; 38-43; 46-51; 54-56	DATA	2
2b	B	38	1-3; 10-15; 19-24; 28-33; 38-43; 48-53	DATA	2
2b	B	39	2-7; 11-16; 20-25; 30-35; 39-44; 49-54	DATA	2
2b	B	40	2-7; 11-16; 20-25; 29-34; 38-43; 47-52; 56	DATA	2
2b	B	41	1-5	DATA	2
2b	B	42	22-27; 30-35; 38-43; 46-51	DATA	2
2b	B	43	1-6; 9-14; 17-22; 25-30; 37-42; 46-51; 55-56	DATA	2
2b	B	44	1-4; 9-14; 19-24; 29-34; 38-43; 47-52	DATA	2

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2b	B	45	1-6; 10-15; 20-25; 29-34; 38-43; 47-52; 56	DATA	2
2b	B	46	1-5; 9-14; 18-23; 27-32; 36-41	DATA	2
2b	B	48	35-41	DATA	2
2b	B	49	51-56	DATA	2
2b	B	51	21-26; 33-38; 41-46; 49-54	DATA	2
2b	B	52	1-6; 9-14; 17-22; 25-30; 33-38; 41-46	DATA	2
2b	B	53	1-6; 18-23	DATA	2
2b	B	54	11-16	DATA	2
2b	B	55	1-6; 36-41; 44-49; 52-56	DATA	2
2b	B	56	1; 4-9; 15-20; 23-28; 31-36; 39-44; 51-56	DATA	2
2b	B	57	4-9; 13-18; 23-28; 33-38; 43-48; 52-56	DATA	2
2b	B	58	1; 5-10; 15-20; 24-29; 34-39; 43-48; 52-56	DATA	2
2b	B	59	1; 5-10; 14-19; 23-28; 32-37; 41-46	DATA	2
2b	B	60	29-34; 37-42; 45-50; 53-56	DATA	2
2b	B	61	1-2; 8-13; 16-21; 24-29; 32-37; 44-49; 53-56	DATA	2
2b	B	62	1-2; 6-11; 16-21; 26-31; 36-41; 45-50; 54-56	DATA	2
2b	B	63	1-3; 8-13; 17-22; 27-32; 36-41; 45-50; 54-56	DATA	2
2b	B	64	1-3; 7-12; 16-21; 25-30; 34-39; 43-48; 52-56	DATA	2
2b	B	65	1; 25-30; 34-39	DATA	2

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3	A	1	11	COL. d, h, i, j, k, l, m, n	2
3	B	3	11, 14, 21, 26, 28, 30, 32, 34, 36, 38	DATA	2
3	B	4	18, 22-24, 30, 34-36, 42, 46-48, 54	DATA	2
3	B	5	2-4, 10, 14-16, 22, 26-28, 34, 38-40, 46, 50-52	DATA	2
3	B	6	2, 6-8, 14, 18-20, 26, 30-32, 38, 43-45, 52, 56	DATA	2
3	B	7	1, 2, 8, 12-14, 20, 24-26, 32, 36-38, 44, 48-50, 56	DATA	2
3	B	8	4-6, 12, 16-18, 24, 28-30, 36, 40-42, 48, 52-54	DATA	2
3	B	9	4, 8-10, 16, 20-22, 28, 32-34, 40, 44-46	DATA	2
6b	A	1	11	DATA	2
6b	B	1	30-40	DATA	2
6b	B	2	8, 10, 14, 23, 25, 29, 38, 40, 44, 53, 55, 59	DATA	2
6b	B	3	2, 4, 8, 21, 23, 27, 35, 37, 41, 52, 54, 58	DATA	2

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10	A	7	17-21	DATA	1
10	A	9	46-52	DATA	1
10	A	10	4-7, 9-22, 27-29, 31-36	DATA	1
10	A	14	43-49, 51	COL. A	1
10	A	16	9, 12-13, 20, 23-24, 27, 29-31, 37, 40-41, 48-50	DATA	1
10	A	17	10, 13-15, 21, 24-25, 28, 30-32, 38, 41-43, 49-51	DATA	1
10	A	18	8-9, 13-14, 18-19, 23-24, 28-29, 33-34, 38-39, 43-44, 48-49, 53-54	DATA	1
10	A	19	8-9, 13-14, 18-19, 23-24, 28-29, 33-34, 38-39, 43-44, 48-49, 53, 54	DATA	1
10	A	20	7-8, 12-14, 18-20, 24-26, 30-32, 36-38, 42-44, 48-50	DATA	1
10	A	21	7-9, 13-15, 19-21, 26	DATA	1
10	A	22	5, 8, 10, 13-14, 17-18, 21-22, 25, 28-29, 32-33, 35, 37, 39, 41-42, 44-45, 47-48, 50, 52-53, 55-56	DATA	1
10	A	23	8, 10-11, 13-15, 17-18, 20-21, 24, 26-27, 29-31, 33, 35-40, 43-45, 47-49, 51	DATA	1
10	A	24	8-10, 15-17	DATA	1
10	A	25	9-11, 15-16, 18-19, 23-25, 27-28, 32-34, 38-39, 41, 45-46, 50-52, 56-57, 59	DATA	1
10	A	26	8-10, 14-16, 21-23	DATA	1

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12a	B	1	27-29, 33-35, 39-41, 44, 51-53, 57-59, 62	DATA	2
12a	B	14	7-10, 13-16, 19-22, 25-28, 31-34, 37-40, 43-46, 51-54, 57-60, 63-66	DATA	2
12a	B	15	3-6, 9-12, 15-18, 21-24, 27-30, 33-36, 39-42, 45-48, 51-54, 57-60, 63-66	DATA	2
12a	B	16	3-6, 9-12, 15-18, 21-24, 27-30, 33-36, 39-42, 45-48, 51-54	DATA	2
12a	B	17	22-25, 30-33, 38-41, 46-49, 54-57, 62-65	DATA	2
12a	B	18	4-7, 10-15, 18, 21-24, 27, 30-33, 36, 39-42, 45, 48-51, 58, 65, 66	DATA	2
12a	B	19	1, 2, 5, 8-11, 14, , 17-20, 23, 26-29, 34-37, 40, 43-46, 51-54, 59-62	DATA	2
12a	B	20	1-4, 9-12, 17-20, 25-28, 33-36, 41-44, 49-52, 57-60, 65, 66	DATA	2
12a	B	21	1, 2, 7-10, 41-44, 47-50, 53-56, 59-62, 65, 66	DATA	2
12a	B	22	1, 2, 5-8, 11-14, 17-20, 23-26, 29-32, 35-38, 41-44, 47, 50, 53-56, 59-62, 65, 66	DATA	2
12a	B	23	1, 2, 5-8, 11-14, 17-20, 23-26, 29-32, 35-38, 41-44, 47-50, 53-56, 59-62, 65-66	DATA	2
12a	B	24	1, 2, 5-8, 11-14, 17-20, 23-26, 58-61, 65-66	DATA	2

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12a	B	25	1, 2, 6-9, 13-16, 20-23, 27-30, 34-37, 41-44, 48-51, 55-58, 62-65	DATA	2
12a	B	26	3-6, 10, 14, 18-21, 25-28, 32-35, 39-42, 46-49, 53-56, 60-63	DATA	2
12a	B	27	1-4, 8-11, 15-18, 22-25, 29-32, 36-39, 43-46, 50-53, 57-60, 64-66	DATA	2
12a	B	28	1, 5-8, 13-16, 39-42, 45-48, 51-54, 57-60, 63-66	DATA	2
12a	B	29	3-6, 9-12, 15-18, 21-24, 27-30, 33-36, 39-42, 45-48, 51, 54-57, 60-63, 66	DATA	2
12a	B	30	1-3, 6-9, 12-15, 18-21, 24-27, 30-33, 36-39, 42-45, 48-51, 54-57, 60-63, 66	DATA	2
12a	B	31	1-3, 6-9, 12-15, 18-21, 24-27, 31-34, 56-59, 62-65,	DATA	2
12a	B	32	2-5, 8-11, 14-17, 20-23, 26-29, 32-35, 38-41, 44-47, 50-53, 56-59, 62-65	DATA	2
12a	B	33	2-5, 8-11, 14-17, 20-23, 26-29, 32-35, 38-41, 44-47, 50-53, 56-59, 62-65	DATA	2
12a	B	34	2-5, 8-11, 14-17, 20-23, 26-29, 32-35, 38-41, 62-65	DATA	2
12a	B	35	2-5, 8-11, 14-17, 20-23, 26-29, 32-35, 38-41, 44-47, 50-53, 56-59, 62-65	DATA	2

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12a	B	36	2, 5-8, 11-14, 17-20, 23-26, 29-32, 35-38, 41-44, 47-50, 53-56, 59-62, 65-66	DATA	2
12a	B	37	1-2, 5-8, 11-14, 17-20 23-26, 29-32, 35-38, 41-44	DATA	2
12a	B	38	46-49, 51-54, 56-59, 61-64, 66	DATA	2
12a	B	39	1-3, 5-8, 10-13, 29-32, 34-37, 39-42, 53-56, 58-61, 63-66	DATA	2
12a	B	40	2-5, 7-10, 15-18, 20-23, 34-37, 39-42, 44, 46-49, 51-54, 59-62, 64-66	DATA	2
12a	B	41	12-15, 17-20, 22-25, 62-65	DATA	2
12a	B	42	2-5, 8-11, 14-17, 20-23, 26-29, 32-35, 38-41, 44-47, 50-53, 56-59, 62-65	DATA	2
12a	B	43	4-7, 10-13, 16-19, 22-25, 28-31, 34-37, 40-43, 46-49, 52-55, 58-61, 64-66	DATA	2
12a	B	44	1, 4-7, 10-13, 16-19, 22-25, 28-31, 34-37, 40-43	DATA	2
16d	A	1	2, 3, 6, 7, 10-13, 15, 16, 25, 26, 29, 30, 33-38, 41	DATA	3
16f	A	1	3, 4, 5, 11-16, 20-23	DATA	4