

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
pricing of unbundled network
elements.

DOCKET NO. 990649-TP
ORDER NO. PSC-01-2495-CFO-TP
ISSUED: December 21, 2001

ORDER GRANTING REQUESTS FOR CONFIDENTIAL TREATMENT
OF DOCUMENT NO. 11249-00 (CROSS-REFERENCED DOCUMENTS NOS. 10196-
00 AND 11246-00), DOCUMENT NO. 11536-00 (CROSS REFERENCED
DOCUMENT NO. 10606-00), DOCUMENT NO. 12403-00 (CROSS-REFERENCED
DOCUMENT NO. 11179-00), AND DOCUMENT NO. 12820-00 (CROSS-
REFERENCED DOCUMENT NO. 11634-00)

On December 10, 1998, in Docket No. 981834-TP, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCIMetro Access Transmission Services, LLC (MCIMetro), WorldCom Technologies, Inc. (WorldCom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), Intermedia Communications Inc. (Intermedia), Supra Telecommunications and Information Systems (Supra), Florida Digital Network, Inc. (Florida Digital Network), and Northpoint Communications, Inc. (Northpoint) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. Among other matters, the Competitive Carriers' Petition asked that this Commission set deaveraged unbundled network element (UNE) rates.

On May 26, 1999, this Commission issued Order No. PSC-99-1078-PCO-TP, granting in part and denying in part the Competitive Carriers' petition. Specifically, the Commission granted the request to open a generic UNE pricing docket for the three major incumbent local exchange providers, BellSouth Telecommunications, Inc. (BellSouth), Sprint-Florida, Incorporated (Sprint), and GTE Florida Incorporated (GTEFL). Accordingly, this docket was opened to address the deaveraged pricing of UNEs, as well as the pricing of UNE combinations and nonrecurring charges.

By Order No. PSC-99-1397-PCO-TP, issued July 20, 1999, the procedures for this docket were established and the controlling dates set. A Second Revised Order on Procedure, Order No. PSC-00-0540-PCO-TP, was issued on March 16, 2000, which set forth new filing dates and also the newly refined issues to be addressed

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in this proceeding. By Order No. PSC-00-2015-PCO-TP, issued June 8, 2000, the filing dates were extended and the procedure for this case was further modified. Pursuant to these Orders, Phase I was set for hearing July 17-19, 2000, and Phase II was set for hearing September 19-22, 2000.

On September 11, 2000, BellSouth filed a Request for Confidential Classification of portions of the Rebuttal Testimony of Joseph H. Page, and Exhibits JHP-1 and JHP-3 (Document No. 11249-00 and cross-referenced Documents Nos. 10196-00 and 11246-00), which BellSouth contends contains vendor-specific pricing, customer proprietary information, and confidential business information. BellSouth also contends that the release of this information would provide its competitors with an unfair advantage in future negotiations, that it has not otherwise been disclosed, and that BellSouth treats this information as confidential.

On September 14, 2000, BellSouth filed a Request for Confidential Classification of portions of the Supplemental Rebuttal Testimony of Terry L. Murray (Document No. 11536-00 and cross referenced Document No. 10606-00). Similarly, BellSouth argues that this response contains vendor-specific pricing, customer proprietary information, and confidential business information. BellSouth contends that the release of this information would provide its competitors with an unfair advantage in future negotiations, that it has not otherwise been disclosed, and that BellSouth treats this information as confidential.

Thereafter, on September 29, 2000, BellSouth filed a Request for Confidential Classification of its Responses to Staff's Tenth Request for Production of Documents, Item Nos. 94 (Document No. 12403-00 and cross-referenced Document No. 11179-00). Again, BellSouth generally contends that these responses contain vendor-specific pricing, customer proprietary information, and confidential business information. BellSouth claims that the release of this information would provide its competitors with an unfair advantage in future negotiations, that it has not otherwise been disclosed, and that BellSouth treats this information as confidential.

Finally, on October 6, 2000, BellSouth filed a Request for Confidential Classification of its Responses to Staff's Third

ORDER NO. PSC-01-2495-CFO-TP
DOCKET NO. 990649-TP
PAGE 3

Requests for Production of Documents, Items Nos. 12, 32, 33, 34, and Fourth Set of Interrogatories, Items Nos. 3, 9, 39c and d, 42b, and 43d (Document No. 12820-00 and cross-referenced Document No. 11634-00). With regard to this information, BellSouth makes the same general contentions as those identified above.

Florida law presumes 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." Rule 25-22.006(4)(c), Florida Administrative Code, provides that it is the Company's burden to demonstrate that the documents fall into one of the statutory examples set out in Section 364.183, Florida Statutes, or to demonstrate that the information is proprietary confidential information, the disclosure of which will cause the Company or its ratepayers harm.

Specifically, with regard to portions of the Supplemental Rebuttal Testimony of Terry L. Murray, BellSouth contends that the pages, columns, and lines identified in Attachment A, which is attached and incorporated herein, should be protected for the reasons also set forth in Attachment A.

As for the portions of the Supplemental Rebuttal Testimony of Terry L. Murray, BellSouth contends that pages identified in Attachment B, which is attached and incorporated herein, should be protected for the reasons also set forth in Attachment B.

Regarding its Responses to Staff's Tenth Request for Production of Documents, Item No. 94, BellSouth seeks confidential treatment of the response in its entirety. Within the reasons supporting its claim, as set forth in Attachment C and incorporated herein, BellSouth emphasizes that it believes that release of the information would impair its ability to contract for goods and services on favorable terms.

Finally, as it pertains to its Responses to Staff's Third Requests for Production of Documents, Items Nos. 12, 32, 33, 34, and Fourth Set of Interrogatories, Items Nos. 8, 9, 39c and d, 42b, and 43d, BellSouth argues that the pages and lines identified in

Attachment D, which is attached and incorporated herein, should be protected for the reasons also set forth in Attachment D. BellSouth notes that releasing this information would provide a competitor with access to intellectual property developed by BellSouth at significant expense. If released, BellSouth maintains that competitors would then have great advantage in bidding for business without having to expend money and resources in market research and development. As such, they would likely be able to undercut BellSouth's bids due to their reduced costs.

Section 364.183(3), Florida Statutes, in pertinent part, provides:

The term "proprietary confidential business information" means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public.

Based on the definition of proprietary confidential business information in Section 364.183(3), Florida Statutes, it appears that the material described herein is proprietary business information in accordance with Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. Disclosure of this information could be detrimental to BellSouth's operations, could impair BellSouth's ability to compete, and its ability to contract for goods and services. As such, BellSouth's Requests for Confidential Classification regarding Document No. 11249-00 (cross-referenced Documents Nos. 10196-00 and 11246-00), Document No. 11536-00 (cross referenced Document No. 10606-00), Document No. 12403-00 (cross-referenced Document No. 11179-00), and Document No. 12820-00 (cross-referenced Document No. 11634-00) respectively, are hereby granted.

ORDER NO. PSC-01-2495-CFC-TP
DOCKET NO. 990649-TP
PAGE 5


Based on the foregoing, it is therefore

ORDERED by Chairman E. Leon Jacobs, Jr., as Prehearing Officer, that BellSouth Telecommunications, Inc.'s Requests for Specified Confidential Classification addressing Document No. 11249-00 (cross-referenced Documents Nos. 10196-00 and 11246-00), Document No. 11536-00 (cross referenced Document No. 10606-00), Document No. 12403-00 (cross-referenced Document No. 11179-00), and Document No. 12820-00 (cross-referenced Document No. 11634-00) respectively, are hereby granted.

ORDERED that pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, the confidentiality granted to the material specified herein shall expire eighteen (18) months from the date of the issuance of this Order, in the absence of a renewed request for confidentiality pursuant to Section 364.183, Florida Statutes. It is further

ORDERED that this Order will be the only notification by the Commission to the parties concerning the expiration of the confidentiality time period.

By ORDER of Chairman E. Leon Jacobs, Jr. as Prehearing Officer, this 21st Day of December, 2001.



E. LEON JACOBS, JR.
Chairman and Prehearing Officer

(S E A L)

WDK

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), 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 wastewater utility. A motion for reconsideration shall be filed with the Director, Division of the Commission Clerk and Administrative Services, 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 requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
9/11/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE REBUTTAL
TESTIMONY OF JOSEPH H. PAGE AND EXHIBITS JHP-1, FILED AUGUST
21, 2000 IN FLORIDA DOCKET NO. 990649-TP

Explanation of Proprietary Information

1. This information reflects vendor specific pricing and/or information negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
2. This information contains competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to information which was developed at an expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as research and development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.
3. This information is derived from the Switching Cost Information System (SCIS) which is the property of Telcordia Technologies, Inc (Telcordia). Public disclosure of this information would violate BellSouth's agreement with Telcordia and would impair BellSouth's ability to contract for goods and/or services in the future. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 2
9/11/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE REBUTTAL
TESTIMONY OF JOSEPH H. PAGE AND EXHIBITS JHP-1, FILED AUGUST
21, 2000 IN FLORIDA DOCKET NO. 990649-TP

REBUTTAL TESTIMONY OF JOSEPH H. PAGE

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
5	Line 24	2
6	Lines 1-7, 24	2
7	Lines 5	2
10	Lines 11-14, 16,18-21	2
11	Lines 7,8,11,14,18,20,21,23,25	2
15	Lines 7-8	1
18	Lines 16-22	2

JHP-1

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
Page 1 of 2	Entire Page	3
Page 2 of 2	Entire Page	3

JHP-3

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
Page 1 of 1	Columns B-G, I	1

ORDER NO. PSC-01-2495-CFO-TP
DOCKET NO. 990649-TP
PAGE 9

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
9/14/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH
PROPRIETARY INFORMATION CONTAINED IN THE SUPPLEMENTAL
REBUTTAL TESTIMONY OF BLUESTAR, COVAD, AND RHYTHMS LINKS'
WITNESS TERRY L. MURRAY, FILED AUGUST 28, 2000 IN FLORIDA
DOCKET NO. 990649-TP**

Explanation of Proprietary Information

1. This information contains actual unit cost information for discrete cost elements for the item under study. These costs reflect BellSouth's long run incremental cost of providing these elements on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth 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.

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
9/14/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH
PROPRIETARY INFORMATION CONTAINED IN THE SUPPLEMENTAL
REBUTTAL TESTIMONY OF BLUESTAR, COVAD, AND RHYTHMS LINKS'
WITNESS TERRY L. MURRAY, FILED AUGUST 28, 2000 IN FLORIDA
DOCKET NO. 990649-TP**

Supplemental Rebuttal Testimony of Terry L. Murray

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
8	9,15	1
33	8-18	1
34	3,5	1

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
9/29/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO THE STAFF'S TENTH REQUEST FOR PRODUCTION OF
DOCUMENTS (POD NO. 94) FILED SEPTEMBER 3, 2000 IN FLORIDA
DOCKET NO. 990649-TP**

Explanation of Proprietary Information

1. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
2. This information contains competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to information which was developed at an expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as research and development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.

ORDER NO. PSC-01-2495-CFO-TP
DOCKET NO. 990649-TP
PAGE 12

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 2
9/29/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO THE STAFF'S TENTH REQUEST FOR PRODUCTION OF
DOCUMENTS (POD NO. 94) FILED SEPTEMBER 8, 2000 IN FLORIDA
DOCKET NO. 990649-TP**

POD No. 94

Location

Reason

Entire Document

1 and 2

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 6
10/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T/MCI
WORLDCOM'S JOINT RESONSES TO STAFF'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (POD NOS. 12, 32, 33 AND 34) AND
FOURTH SET OF INTERROGATORIES (ITEM NOS. 8, 9, 39C AND D, 42B
AND 43D) FILED SEPTEMBER 15, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

Explanation of Proprietary Information

1. This information contains actual unit cost information for discrete cost elements for the item under study. These costs reflect BellSouth's long run incremental cost of providing these elements on a going forward basis. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.1283, Florida Statutes and is exempt from the Open Records Act.
2. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
3. This information contains competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to information which was developed at an expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as research and development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 6
10/06/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T/MCI
WORLDCOM'S JOINT RESONSES TO STAFF'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (POD NOS. 12, 32, 33 AND 34) AND
FOURTH SET OF INTERROGATORIES (ITEM NOS. 8, 9, 39C AND D, 42B
AND 43D) FILED SEPTEMBER 15, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

Explanation of Proprietary Information

4. This information is derived from the Switching Cost Information System (SCIS) which is the property of Telcordia Technologies, Inc (Telcordia). Public disclosure of this information would violate BellSouth's agreement with Telcordia and would impair BellSouth's ability to contract for goods and/or services in the future. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 3 of 6
10/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T/MCI
WORLDCOM'S JOINT RESONSES TO STAFF'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (POD NOS. 12, 32, 33 AND 34) AND
FOURTH SET OF INTERROGATORIES (ITEM NOS. 3, 9, 39C AND D, 42B
AND 43D) FILED SEPTEMBER 15, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

Interrogatory Item No. 8

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 1	1-8	1
Page No. 2	1	1

Interrogatory Item No. 9

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 2	13-15, 21	1
Page No. 3	1,2	1

Interrogatory Item No. 39c

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 29	20,21	3

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 4 of 6
10/06/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T/MCI
WORLD COM'S JOINT RESPONSES TO STAFF'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (POD NOS. 12, 32, 33 AND 34) AND
FOURTH SET OF INTERROGATORIES (ITEM NOS. 8, 9, 39C AND D, 42B
AND 43D) FILED SEPTEMBER 15, 2000 IN FLORIDA DOCKET NO. 990649-
TP

Interrogatory Item No. 39d

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 30	7,9,18,20	2

Interrogatory Item No. 42b

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 33	10,11	3

Interrogatory Item No. 43d

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 35	14-17	2

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 5 of 6
10/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T/MCI
WORLD COM'S JOINT RESPONSES TO STAFF'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (POD NOS. 12, 32, 33 AND 34) AND
FOURTH SET OF INTERROGATORIES (ITEM NOS. 8, 9, 39C AND D, 42B
AND 43D) FILED SEPTEMBER 15, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

Pleading Response POD No. 32

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 37	4,5	3

Pleading Response POD No. 33

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 37	17-21	3
Page No. 38	1	3

Pleading Response POD No. 34

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page No. 38	9,10	3

POD No. 12

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Page 125 of 140	17	2

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 6 of 6
10/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T/MCI
WORLDCOM'S JOINT RESONSES TO STAFF'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (POD NOS. 12, 32, 33 AND 34) AND
FOURTH SET OF INTERROGATORIES (ITEM NOS. 8, 9, 39C AND D, 42B
AND 43D) FILED SEPTEMBER 15, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

POD No. 33

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Pg 1 of 1	Entire Document	3

POD No. 34

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
1-49	Entire Doc	4

PROPRIETARY FILES ON CD

The following files located on the CD provided contain proprietary information:

<u>File</u>	<u>Reason</u>
2. 990649 attworldc	1,2,3,4
4. 990649 attworldc	1,2,3,4
10. darnell more work	1,2,3,4
11. darnell workpaper	1,2,3,4
12. pitts,%growth	1,2,3,4
13. pitts, alternativem	1,2,3,4
14. pitts,CMRLiness	1,2,3,4
15. pitts, featuresusi	1,2,3,4