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July 2, 1993

Mr. Steve C. Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request For Confidential Classification. Please file this document in the above-captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

  
Sidney J. White, Jr.

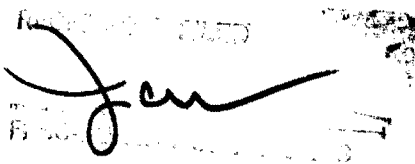
Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

DOCUMENT NUMBER-DATE

07107 JUL-28

RECORDS AND REPORTING



**CERTIFICATE OF SERVICE**

**Docket No. 920260-TL**  
**Docket No. 900960-TL**  
**Docket No. 910163-TL**  
**Docket No. 910727-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 2nd day of July, 1993 to:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph ) Filed: July 2, 1993  
Company )  
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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006(4), Florida Administrative Code, and files its Request for Confidential Classification for certain information contained in the Company's Minimum Filing Requirements (MFR) being filed on July 2, 1992.

1. In accordance with Rule 25-22.006(4), Florida Administrative Code, Southern Bell is filing its Request for Confidential Classification for the portions of the MFR Schedules containing unit cost information relating to Southern Bell's ESSX® service, access service, billing and collection services and Prestige® service.

2. Southern Bell has appended to this request for confidential classification as Attachment A a listing of the location in the documents of the information designated by Southern Bell as confidential as well as a statement correlating the page(s) and line(s) identified with the specific justification(s) proffered in support of the confidential classification of such material. These justifications should be considered in conjunction with the additional arguments contained

herein. In any instances in which Southern Bell has requested that an entire document be granted confidential classification, this representation and specific justification therefore will be included in place of specific location information.

3. Appended hereto in an envelope designated as Attachment B are two edited copies of the documents with the confidential information deleted.

4. A sealed package marked as Attachment C contains copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on other parties to this proceeding.

5. With respect to the cost information relating to ESSX service, the unit cost information comprises a part of the cost of providing ESSX service. ESSX service costs are highly proprietary and should not be made available to Southern Bell's competitors, which include providers of Public Branch Exchange ("PBX") systems and key systems. ESSX service is provided in competition with these alternative providers, and the disclosure of the unit cost information relating to components of ESSX service would harm Southern Bell's competitive business. Section 364.183(3)(e), Florida Statutes, specifically provides an exemption from the inspection and examination provisions of § 119.07(1), Florida Statutes, for information relating to competitive interests, the disclosure of which would impair the competitive business of a provider of such information.

6. In many instances, a potential customer requests bids from various vendors providing the types service and equipment the customer may wish to purchase. In situations in which ESSX service is one competitive alternative, Southern Bell must utilize contract service arrangements ("CSAs") pursuant to General Subscriber Service Tariff Section A5.7, which allows Southern Bell to develop customer-specific prices in lieu of existing tariff offerings in order to compete for such business. If Southern Bell's competitors are provided Southern Bell's unit costs to provide certain crucial components of its ESSX service, they will know with almost complete certainty what their bid would have to be relative to their competitive alternative in order to win the contract. The ESSX cost information in question is feature-specific, and a competitor would be able to determine crucial cost elements comprising Southern Bell's ESSX service. Southern Bell does not have unrestricted access to its competitors' costs of providing their products and services. It would be inequitable and unfair to allow public access to Southern Bell's similar cost information. The competitors would have a significant advantage over Southern Bell in this market if Southern Bell was forced to publicly disclose its cost information of a similar kind.

7. Furthermore, if this information were made available to Southern Bell's customers, they would then be in a much better position to strategically negotiate contract service

arrangements. Conversely, the availability of this information to potential customers could impede Southern Bell's ability to contract on the most favorable terms possible with such customers. Since by definition Southern Bell uses only CSAs when the cost to serve a particular customer is less than the average cost upon which the tariff rate is based, if a CSA is to be utilized, the customer who is the subject of the CSA would know that Southern Bell's costs to serve him are less than Southern Bell's average cost to provide ESSX service. As a result, at a minimum, the customer who knew Southern Bell's costs would also know that he could probably "hold out" for lower rates. Thus, Southern Bell would be at a great disadvantage when negotiating ESSX service CSAs if the data was made publicly available.

8. The cost information is valuable, is used by Southern Bell in conducting its business, and Southern Bell strives to keep it secret. Therefore, such information is also a trade secret which should be classified as proprietary confidential business information pursuant to §§ 364.183(3)(a) and (3)(e), Florida Statutes, and exempt from the inspection and examination provisions of § 119.07(1), Florida Statutes.

9. In this and other dockets, the Commission has previously afforded confidential classification to the same type of ESSX service costs sought to be classified as confidential herein. Order No. PSC-93-0413-CFO-TL, issued March 17, 1993 in Docket No. 920260-TL and related dockets (relating to Southern Bell's

previous MFR Schedules relating to ESSX cost information filed earlier in this case); In re: Proposed Tariff By Southern Bell Telephone and Telegraph Company To Introduce New Features For Digital ESSX Service And To Provide Structural Changes For Both ESSX Service And Digital ESSX Service, Order No. 24256, issued March 20, 1991 in Docket No. 881257-TL. Consequently, based on prior Commission decisions consistent with the compelling arguments herein justifying the confidential classification of the ESSX-related and feature-specific unit cost information, this information should similarly be afforded confidential classification.

10. For the same basic competitive reasons supporting the confidential classification of ESSX service costs, the costs underlying Southern Bell's Prestige service should be similarly afforded confidential classification. PBX and Key systems offer competitive alternatives to the features provided by Southern Bell's Prestige service. The Commission has previously recognized that market studies relating to Prestige service are entitled to confidential classification. Order No. 18317, issued October 20, 1987, in Docket No. 870594-TL. The Commission's previous recognition that there could be competitive harm to Southern Bell from release of market information on Southern Bell's competitive Prestige service supports the further recognition that the competitive cost information relating to this service should likewise be protected from public disclosure



to Southern Bell's competitors. If such information is publicly disclosed to Southern Bell's competitors, the Company's competitive interests could be harmed. Section 364.183 (3)(e), Florida Statutes, affords proprietary and confidential status to information of this nature.

11. With respect to the information relating to the local transport and switching elements of switched access service, the unit cost information discloses the economic costs for these discrete service elements, and such costs are valuable, are used by the Company in making business decisions and the Company strives to keep such information secret. Also, this information is of competitive value, and the public disclosure of the information could harm Southern Bell's competitive interests. Section 364.183(3)(a) and (e), Florida Statutes, expressly provides that such information is entitled to confidential classification.

12. The potential competitive harm to Southern Bell from unrestricted public disclosure of this information must not only be viewed in the context of the present competitive circumstances, but must also be considered in the context of circumstances known or likely to occur in the immediate future. Although at the present time there is no direct substitute for Southern Bell's switched access services, Alternative Access Vendors (AAVs) currently compete against Southern Bell's special access services in the State of Florida. These alternative

special access services do present an alternative for switched access services. Other factors may also have a significant impact on the extent of the competition faced by Southern Bell's access services, including pending FCC action on both special and switched access collocation and interconnection and the pending Intermedia application before the Florida Commission for collocation and interconnection of special access and private line services. Southern Bell's switched access cost data by rate element will be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing, and overall business strategies and regarding whether or not such competition would likely be viable as compared to Southern Bell's competing access services. Moreover, Southern Bell's cost levels are of significant interest to its competitors or potential competitors because costs form the practical floor for prices. If a competitor knows Southern Bell's costs to provide these access service elements, it will also have a much clearer picture of its competitive entry and pricing options vis-a-vis Southern Bell.

13. Southern Bell cannot obtain unrestricted access to and use of similar cost information from its competitors or potential competitors.<sup>1</sup> Therefore, the public disclosure of Southern

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<sup>1</sup> When such information has been requested by Southern Bell, these parties have either objected to producing such information or have insisted on highly restrictive protective agreements limiting the use of such information by Southern Bell. Southern

Bell's cost information would give its competitors an unfair advantage over the Company since these competitors would then have a picture of Southern Bell's costs for use in analyzing the competitors' services vis-a-vis Southern Bell's alternative services.

14. Finally, if individual cost elements are not afforded confidential classification, and enough of these cost elements are publicly disclosed, Southern Bell's total cost structure and levels would eventually be disclosed. This is analogous to the Commission allowing public disclosure of all the individual pieces to the puzzle while, at the same time, purportedly acknowledging that the completed puzzle itself would be entitled to confidential classification. This incongruent rationale is both untenable and would clearly lead to the public disclosure of Southern Bell's proprietary cost of service data. If this were to occur, Southern Bell's competitors could reconstruct Southern Bell's serving arrangements with all their attendant costs and thereby "look inside" the Company's network provisioning for access services. Such information is unquestionably of competitive value. These same issues were addressed by the Prehearing Officer in Order No. PSC-93-0876-CFO-TL, issued June 10, 1993. Although the Order made a tentative ruling denying Southern Bell's request for confidential classification, the

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Bell is merely asking for equal treatment such regard to the same type of data.

Company has filed a Motion for Reconsideration of this tentative decision based on apparent mistakes of fact and improper analysis of Southern Bell's original arguments justifying confidential classification. Southern Bell hereby incorporates by reference herein all arguments made in its previous motion relating to this same type of information.

15. With respect to the information relating to Southern Bell's billing and collection service unit costs, this information is entitled to confidential classification due to the competitive value to competitors of such information as well as the harmful effect it could have on Southern Bell's ability to negotiate billing and collection contracts with its customers on favorable terms if publicly disclosed. Section 364.183(3)(d) and (e) expressly provide that this information is proprietary confidential business information exempt from the inspection and examination provisions of Section 119.07(1), Florida Statutes.

16. Southern Bell will first address the competitive aspects of the cost information. The billing and collection services offered by Southern Bell can be provided by other interexchange carriers, (IXCs), Regional Bell Operating Companies (RBOCs), credit card companies, or by any other company who is currently providing, or who could provide data processing and billing services. Consequently, any company with billing resources can compete for Southern Bell's billing and collection business.

17. Numerous computer and telecommunications magazines and periodicals contain advertisements for billing services similar to those provided by Southern Bell. In fact, many IXCs now perform a significant amount of their own billing and have sophisticated billing systems similar to Southern Bell's. Cincinnati Bell's billing subsidiary is a strong, potential competitor in Southern Bell's territory. Credit card vendors, such as Sears, American Express, Visa, and MasterCard, which also provide billing and collection services, offer a full range of billing services. Included among those services are credit card promotion, credit authorization, transaction accounting, mailing statements, collections and financing receivables. EDS, a subsidiary of General Motors, is a significant competitor, providing billing services to smaller IXCs. GTE and NCR also provide billing services, as well as the other smaller companies and service bureaus who provide billing and collection services to IXCs, AOS providers and NPATS providers. Even the large accounting firms, such as Arthur Anderson, advertise that they can now provide billing and collections services. Consequently, competition clearly exists in the billing and collection arena.

18. Southern Bell's billing and collection service unit costs are proprietary confidential business information, the public disclosure of which could be harmful to Southern Bell's competitive interests. As such, this information is expressly considered to be entitled to confidential classification pursuant

to Section 364.183(e), Florida Statutes. Alternative billing and collection providers could gain a competitive advantage if allowed unrestricted access to this information. This data could give competitors a clear picture of the incremental costs required to provide the billing and collection services offered by Southern Bell. Knowledge of such costs could easily allow a competitor to assess its potential in the market, facilitate its decision of whether and when to enter the market and provide valuable insights into the prices it must charge to compete against Southern Bell. Although billing and collection services for Southern Bell's telecommunications service customers is regulated in Florida, it is unregulated at the interstate level. Competitors for such services could use Southern Bell's costs to establish the Company's price floors and thereby gain an unfair advantage for their competitively priced responses.

19. Another compelling reason to grant confidential classification to Southern Bell's billing and collection cost information is that public disclosure of such information could harm Southern Bell in its non-tariffed billing and collection contract negotiations with its current and potential customers for such services. To the extent IXCs or other such customers have knowledge of Southern Bell's costs to provide these services, Southern Bell could be placed in an unequal bargaining position and undue pressure could be exerted on the Company to reduce its contract prices accordingly. As a result, Southern

Bell could be impeded in its efforts to contract for these services on terms favorable to the Company. Section 364.183(3)(d), Florida Statutes, expressly provides that such critical information underlying Southern Bell's contract arrangements for billing and collection services is entitled to be classified as proprietary and confidential business information.

The Commission has previously afforded confidential classification to costs for billing and collection services. Order No. 24531, issued May 14, 1991 in Docket No. 860723-TP. In finding that such information was proprietary confidential business information, the Commission cited both reasons presented by Southern Bell herein for justifying such proprietary treatment. Billing and collection services are more competitive today than they were in 1991, which clearly supports continued treatment of billing and collection costs as proprietary. Also, the arguments regarding possible contract negotiation impairment are equally as valid today as in the past.

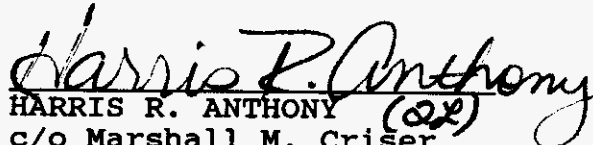
20. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

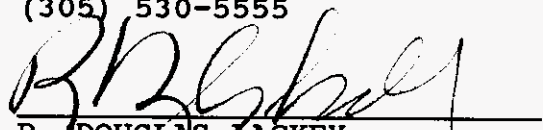
WHEREFORE, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attached exhibits to

be proprietary confidential business information and thus not  
subject to public disclosure.

Respectfully submitted this 2nd day of July, 1993.

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**RATIONALE FOR PROPRIETARY CLASSIFICATION****1. ESSX<sup>R</sup> AND PRESTIGE<sup>R</sup> COMMUNICATIONS SERVICE COSTS**

The information provided in this document for tariff sections A12 and A112 under the Revenue Requirement column should be protected with a Specified Confidential Classification for the following reasons:

These numbers represent the cost for ESSX<sup>R</sup> service and Prestige<sup>R</sup> Communications Service (PCS). Both services are directly competitive with PBX and key systems. Since ESSX<sup>R</sup> provides the same internal switching functions provided by a PBX, and PCS provides the same features as competitor's key systems and small PBX's, making these cost numbers public would provide Southern Bell's competitors a significant advantage in that they would know, with almost complete certainty, what a bid would have to be in order to win a contract. Southern Bell's ratepayers would be harmed by the subsequent loss of contracts resulting from such knowledge. Southern Bell further asserts that similar cost information is closely guarded from disclosure by its competitors, just as Southern Bell itself protects such information.

If this ESSX<sup>R</sup> information were made available to Southern Bell's customers, they would be in a much better position to negotiate contract service arrangements. Since CSA's by definition can only be used when the cost to serve a particular customer is less than the average cost, upon which the tariff is based, a customer receiving a CSA from Southern Bell could know the average cost and realizing that his own costs are less could demand rates as low as our average cost. Thus, Southern Bell would be at a great disadvantage in negotiating CSA's.

Furthermore, in Docket No. 881257-TL, Order No.24256, dated 3/20/91, it was determined that it would be appropriate to grant specified confidential classification to ESSX<sup>R</sup> cost elements.

**2. SWITCHED ACCESS SERVICE INCREMENTAL COSTS**

The information provided in this document for tariff sections E6.8.1 and E6.8.2 under the Revenue Requirement column should be protected with a Specified Confidential Classification for the following reasons:

The incremental costs for Switched Access Local Transport and Local Switching are proprietary because they provide information which can be used by Southern Bell's competitors to make business decisions detrimental to the company and ultimately to its ratepayers. Special access competition is currently a reality in the State of Florida. Disclosure of Southern Bell's incremental access costs provides competitive access providers with Southern Bell's price floor which is very desirable information for formulating competitive pricing strategies. Such information would also be useful to the competitor in making decisions regarding market entry. That is, having knowledge of their cost structure and pricing alternatives, they could use Southern Bell's cost information to determine Southern Bell's ability to compete with them. Comparable cost information for competitive access providers is not available to Southern Bell.

### 3. BILLING AND COLLECTIONS COSTS

The information in this document for tariff sections 13.4.1 and E8 under the Revenue Requirement column should be protected with a specified confidential classification for the following reasons:

The billing and collections services offered by Southern Bell could be provided by AT&T, another interexchange carrier, another Regional Bell Operating Company (RBOC), a credit card company, or by any company who is currently providing or who could provide data processing and billing services. Any company with the billing resources can compete for the billing and collections business.

Recent computer and telecommunications magazines and periodicals contain advertisements for billing services similar to the RBOCs. Many IXCs perform a significant amount of their own billing and have sophisticated billing systems similar to Southern Bell's. Cincinnati Bell's billing subsidiary is a strong, potential competitor. Credit card vendors, such as Sears,

American Express, Visa, and MasterCard, which also provide Billing and Collection Services, offer a full range of billing services. Included among those services are credit card promotion, credit authorization, transaction accounting, mailing statements, collections and financing receivables. EDS, a subsidiary of General Motors, is a significant competitor, providing billing services to smaller IXC's. GTE and NCR also provide billing services, not to mention the other smaller companies and service bureaus who provide Billing and Collection services to IXC's, AOS providers and NPATS providers. Even the large accounting firms, such as Arthur Anderson, advertise that they can provide billing and collections services. Clearly competition exists in the Billing and Collections arena.

The Billing and Collections unit costs are extra-sensitive data and could be harmful to Southern Bell if disclosed. Alternative billing and collection providers exist which could gain a competitive advantage if allowed unrestricted access to this information. This data could give competitors a clear picture of the incremental costs required to provide the billing and collections services offered by Southern Bell. Knowledge of such costs could easily allow a competitor to assess its potential in the market and facilitate its decision of whether or not to enter the market and when.

Disclosure of this information would compromise the negotiating positions of Southern Bell in contract discussions with the interexchange carriers, RBOCs or other potential billing and collections clients for billing and collections services not covered by the tariff.

The release of this information would be unfair to Southern Bell for it would allow the competition to have free access to Southern Bell's costs. Competitors would then have an advantage in bidding for such

business since they would have few, if any, expenses such as market research and market development to recover, and would bid below Southern Bell's cost level.

Competition from major companies exists in the billing and collections arena. Release of the incremental cost information developed by Southern Bell for these services would disadvantage Southern Bell competitively; therefore, proprietary treatment of this information is paramount.

**INDEX OF PROPRIETARY MATERIAL**  
**FPSC DOCKET 920260-TL**  
**SOUTHERN BELL MFR SCHEDULE E-1A FOR 1992 & 1993**  
**FILED 7/2/93**

SCHEDULE E - 1A  
FILING DATE JULY 2, 1993

REVENUE REQUIREMENT COLUMN

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			<u>PAGE 120</u>	<u>OF 1040</u>	<u>A12.1.8</u>	2	1
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<u>PAGE 120</u>	<u>OF 1040</u>	<u>A12.1.9</u>				19	1
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<u>PAGE 124</u>	<u>OF 1040</u>	<u>A12.1.9</u>	2	1			
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			<u>PAGE 230</u>	<u>OF 1040</u>	<u>A12.13.8</u>	2	1
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<u>PAGE 237</u>	<u>OF 1040</u>	<u>A12.13.9</u>	3	1
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			<u>PAGE 264</u>	<u>OF 1040</u>	<u>A12.13.11</u>	2	1
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<u>PAGE 280 OF 1040</u>	<u>A12.13.11</u>	1	1
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		<u>PAGE 281 OF 1040</u>	<u>A12.13.11</u>
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<u>PAGE 282 OF 1040</u>	<u>A12.13.11</u>	22	1
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<u>PAGE 284 OF 1040</u>	<u>A12.13.11</u>	17	1
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<u>PAGE 287</u>	<u>OF 1040</u>	<u>A12.13.13</u>	1	1
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<u>PAGE 289</u>	<u>OF 1040</u>	<u>A12.13.13</u>	1	1
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<u>PAGE 290</u>	<u>OF 1040</u>	<u>A12.13.13</u>	1	1
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<u>PAGE 292</u>	<u>A12.13.14</u>	22	1
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<u>PAGE 294</u>	<u>A12.13.14</u>	2	1
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<u>PAGE 296</u>	<u>OF 1040</u>	<u>A12.13.8</u>	22	1
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<u>PAGE 299</u>	<u>OF 1040</u>	<u>A12.13.9</u>	1	1			
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<u>PAGE 302</u>	<u>OF 1040</u>	<u>A12.13.10</u>	1	1
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<u>PAGE 303</u>	<u>OF 1040</u>	<u>A12.13.11</u>	1	1
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<u>PAGE 307</u>	<u>OF 1040</u>	<u>A12.13.11</u>	1	1
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<u>PAGE 308</u>	<u>OF 1040</u>	<u>A12.13.11</u>	1	1
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<u>PAGE 309</u>	<u>OF 1040</u>	<u>A12.13.11</u>	1	1
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<u>PAGE 313</u> <u>OF 1040</u>	<u>A12.13.11</u>	5	1
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<u>PAGE 314</u> <u>OF 1040</u>	<u>A12.13.11</u>	11	1
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<u>PAGE 315</u> <u>OF 1040</u>	<u>A12.13.13</u>	15	1
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<u>PAGE 330</u>	<u>OF 1040</u>	<u>A12.17.3</u>	2	1
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<u>PAGE 331</u>	<u>OF 1040</u>	<u>A12.17.3</u>	2	1
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<u>PAGE 332</u>	<u>OF 1040</u>	<u>A12.17.3</u>	2	1
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<u>PAGE 333</u>	<u>OF 1040</u>	<u>A12.17.3</u>	1	1
<u>PAGE 334</u>	<u>OF 1040</u>	<u>A12.17.3</u>	2	1
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<u>A12.18.4</u>	2	1
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A112.19.4

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A112.19.4

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<u>PAGE 815</u>	<u>OF 1040</u>	<u>A112.19.4</u>	5	1
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<u>PAGE 816</u>	<u>OF 1040</u>	<u>A112.19.4</u>	1	1
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<u>PAGE 817</u>	<u>OF 1040</u>	<u>A112.19.4</u>	2	1
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<u>PAGE 824</u>	<u>OF 1040</u>	<u>A112.19.4</u>	
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A112.21.3

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829	1040	A112.22.4	2	1
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PAGE 830	OF 1040	A112.22.4	2	1
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PAGE 831	OF 1040	A112.22.4	2	1
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PAGE 833	OF 1040	A112.23.4	2	1
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			10	2
<u>PAGE 988</u>	<u>OF 1119</u>	<u>E6.8.2</u>	13	2
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<u>PAGE 989</u>	<u>OF 1119</u>	<u>E6.8.2</u>	1	2
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E8.1.7

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E8.2.1

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E8.2.1

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E8.2.2

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E8.2.2

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E8.3.7

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E8.4.7

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		<u>PAGE 166</u> <u>OF 1119</u>	<u>A12.1.7</u>	3	1
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<u>PAGE 167</u> <u>OF 1119</u>	<u>A12.1.7</u>	2	1		
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<u>PAGE 168</u> <u>OF 1119</u>	<u>A12.1.8</u>	2	1		
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<u>PAGE 169</u> <u>OF 1119</u>	<u>A12.1.8</u>	6	1		
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<u>PAGE 170</u> <u>OF 1119</u>	<u>A12.1.8</u>	11	1		
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<u>PAGE 171</u> <u>OF 1119</u>	<u>A12.1.8</u>	2	1		
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<u>PAGE 178</u>	<u>OF 1119</u>	<u>A12.1.8</u>	2	1			
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			<u>PAGE 178</u>	<u>OF 1119</u>	<u>A12.1.9</u>	19	1
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<u>PAGE 179</u>	<u>OF 1119</u>	<u>A12.1.9</u>	13	1			
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<u>PAGE 180</u>	<u>OF 1119</u>	<u>A12.1.9</u>	6	1			
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<u>PAGE 181</u>	<u>OF 1119</u>	<u>A12.1.9</u>	21	1			
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			<u>PAGE 182</u>	<u>OF 1119</u>	<u>A12.1.9</u>	2	1
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<u>PAGE 183</u>	<u>OF 1119</u>	<u>A12.1.9</u>	2	1			
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			<u>A12.1.10</u>	14	1		
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<u>PAGE 185</u>	<u>OF 1119</u>	<u>A12.1.10</u>	5	1			
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			<u>PAGE 186</u>	<u>OF 1119</u>	<u>A12.1.10</u>	10	1
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			<u>PAGE 187</u>	<u>OF 1119</u>	<u>A12.1.10</u>	12	1
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			<u>PAGE 190</u>	<u>OF 1119</u>	<u>A12.1.12</u>	3	1
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<u>PAGE 191</u>	<u>OF 1119</u>	<u>A12.1.12</u>				14	1
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<u>PAGE 211</u>	<u>A12.1.12</u>	1	1
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<u>PAGE 218</u> <u>OF 1119</u>	<u>A12.1.15</u>	1	1
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<u>PAGE 219</u> <u>OF 1119</u>	<u>A12.1.15</u>	3	1
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<u>PAGE 221</u> <u>OF 1119</u>	<u>A12.1.15</u>	19	1
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<u>PAGE 222</u> <u>OF 1119</u>	<u>A12.1.15</u>	1	1
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A12.15.5

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A12.1.7

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		<u>PAGE 350 OF 1119</u>	<u>A12.13.13</u>	1	1
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<u>PAGE 350 OF 1119</u> <u>PAGE 351 OF 1119</u>	<u>A12.13.14</u> <u>A12.13.14</u>	19	1		
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<u>PAGE 352 OF 1119</u>	<u>A12.13.14</u>	9	1		
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<u>PAGE 354 OF 1119</u>	<u>A12.13.7</u>	6	1
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<u>PAGE 354 OF 1119</u>	<u>A12.13.8</u>	22	1
<u>PAGE 355 OF 1119</u>	<u>A12.13.8</u>	1	1
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<u>PAGE 356 OF 1119</u>	<u>A12.13.8</u>	3	1
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<u>PAGE 357 OF 1119</u>	<u>A12.13.9</u>	1	1
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<u>PAGE 358 OF 1119</u>	<u>A12.13.9</u>	19	1
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<u>PAGE 358 OF 1119</u>	<u>A12.13.10</u>	16	1
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<u>PAGE 365 OF 1119</u>	<u>A12.13.11</u>	2	1
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<u>PAGE 367 OF 1119</u>	<u>A12.13.11</u>	21	1
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		<u>PAGE 372 OF 1119</u>	<u>A12.13.11</u>	11	1
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<u>PAGE 373 OF 1119</u>	<u>A12.13.11</u>	22	1		
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<u>PAGE 373 OF 1119</u>	<u>A12.13.13</u>	12	1		
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<u>PAGE 379 OF 1119</u>	<u>A12.16.3</u>	3	1
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<u>A12.17.3</u>	3	1
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<u>PAGE 397 OF 1119</u>	<u>A12.18.4</u>	2	1
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<u>PAGE 398 OF 1119</u>	<u>A12.18.4</u>	2	1
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<u>PAGE 399 OF 1119</u>	<u>A12.18.4</u>	2	1
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<u>PAGE 401 OF 1119</u>	<u>A12.18.4</u>	2	1
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<u>PAGE 402 OF 1119</u>	<u>A12.18.4</u>	2	1
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A112.19.4

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		17	1		
		18	1		
		19	1		
		20	1		
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		23	1		
		<u>PAGE 883 OF 1119</u>	<u>A112.19.4</u>	1	1
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<u>PAGE 889 OF 1119</u>	<u>A112.19.4</u>			2	1
				3	1
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<u>A112.21.3</u>	2	1
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	4	1
	5	1
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	16	1
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<u>A112.21.3</u>	2	1
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	7	1
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	9	1
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<u>A112.21.3</u>	2	1
	3	1
	4	1
	5	1
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		13	1
		20	1
<u>PAGE 895 OF 1119</u>	<u>A112.22.4</u>	6	1
<u>PAGE 896 OF 1119</u>	<u>A112.22.4</u>	2	1
		3	1
		4	1
		5	1
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<u>PAGE 898 OF 1119</u>	<u>A112.23.4</u>	2	1
		3	1
		4	1
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		20	1
<u>PAGE 899 OF 1119</u>	<u>A112.23.4</u>	2	1
		3	1
		4	1
		5	1
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		6	1

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8	3
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11	3
12	3
14	3