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March 9, 2000

KAREN D. WALKER
850-425-5612

Internet Address:
kwalker@hklaw.com

VIA HAND DELIVERY

Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED - FPSC
 00 MAR - 9 PM 2:59
 RECORDS AND REPORTING

Re: In Re: Cancellation by Florida Public Service Commission of Interexchange Telecommunications Certificate No. 2481 Issued to RSL COM U.S.A., Inc. d/b/a Westinghouse Communications for Violation of Rule 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies, Docket No. 992008-TI

Dear Ms. Bayo:

Enclosed for filing on behalf of RSL COM U.S.A., Inc. ("RSL USA") are the original and fifteen (15) copies of RSL USA's Request for Voluntary Cancellation of Interexchange Certificate No. 2481 and Amended to Interexchange Certificate No. 4068, and Petition for Partial Waiver of Rule 25-4.0161, Florida Administrative Code.

For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

- AFA _____
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
- LEG 2
- MAS _____
- OPC _____
- RRR _____
- SEC 1
- WAW _____
- OTH _____

Sincerely,

HOLLAND & KNIGHT LLP



Karen D. Walker

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03089 MAR - 9 8

FPSC-RECORDS/REPORTING

Blanca Bayo
March 9, 2000
Page 2

KDW:kjg
Enclosure

cc: Paula Isler (w/enclosure)
Kimberley Pena (w/ enclosure)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Cancellation by Florida Public Service)
 Commission of Interexchange Telecommunications)
 Certificate No. 2481 Issued to RSL COM U.S.A.,) Docket No. 992008-TI
 Inc. d/b/a Westinghouse Communications for)
 Violation of Rule 25-4.0161, F.A.C., Regulatory)
 Assessment Fees; Telecommunications Companies)
 _____/

**REQUEST FOR VOLUNTARY CANCELLATION OF
 INTEREXCHANGE CERTIFICATE NO. 2481 AND AMENDMENT TO
 INTEREXCHANGE CERTIFICATE NO. 4068,
 AND PETITION FOR PARTIAL WAIVER
OF RULE 25-4.0161, FLORIDA ADMINISTRATIVE CODE**

RSL COM U.S.A., Inc. ("RSL USA"), by and through undersigned counsel, pursuant to Rule 25-24.474(2), Florida Administrative Code, requests that the Florida Public Service Commission (the "Commission") cancel Interexchange ("IXC") Certificate No. 2481 issued to RSL USA d/b/a Westinghouse Communications on November 13, 1998 pursuant to Order No. PSC-98-1501-FOF-TI. Due to an error on the part of RSL USA, the company was issued two IXC certificates by the Commission: IXC Certificate No. 4068, which was issued in the name of RSL USA; and IXC Certificate No. 2481, which was issued in the name of RSL USA d/b/a Westinghouse Communications. RSL USA currently does business in Florida under the names RSL COM U.S.A., Inc. and Westinghouse Communications. However, it does not need two IXC certificates. Accordingly, upon cancellation of IXC Certificate No. 2481, RSL USA requests that the Commission amend the remaining IXC Certificate -- Certificate No. 4068 -- to acknowledge the use of the fictitious name Westinghouse Communications by RSL USA. Due to the issuance of duplicate IXC

DOCUMENT NUMBER-DATE

03089 MAR-98

FPSC-REG-REC/REPORTING

Certificates to RSL USA, the Commission has issued duplicate regulatory assessment fee return forms to RSL USA -- one for each certificate. Thus, RSL USA also hereby petitions the Commission, pursuant to Rules 25-24.455(4) and 28-104.002, Florida Administrative Code, for a waiver of Rule 25-4.0161 to the extent that RSL USA has been assessed duplicate regulatory assessment fees by the Commission as a result of RSL USA holding two IXC certificates.

BACKGROUND

1. RSL USA provides interexchange telecommunications services in forty-nine states, including Florida. RSL USA's address is:

RSL COM U.S.A., Inc.
430 Park Avenue, Fifth Floor
New York, New York 10022
Tel: (212) 588-3668
Fax: (212) 588-3601

2. On August 14, 1995, the Commission issued IXC Certificate No. 4068 to International Telecommunications Corporation ("ITC"), predecessor in interest to RSL USA. See In Re: Application for certificate to provide interexchange telecommunications service with alternative operator service by INTERNATIONAL TELECOMMUNICAITONS CORPORATION, 95 F.P.S.C. 8:262, Docket No. 950601-TI, Order No. PSC-95-0991-FOF-TI (Aug. 14, 1995).

3. On June 13, 1997, the Commission amended IXC Certificate No. 4068 to reflect ITC's name change to RSL USA. See In re: Request for name change on Interexchange Telecommunications Certificate No. 4068 from International

Telecommunications Corporation to RSL COM U.S.A., Inc., 97 F.P.S.C. 6:265, Docket No. 970588-TI, Order No. PSC-97-0707-FOF-TI (June 13, 1997).

4. On August 14, 1998, Westinghouse Electric Corporation d/b/a Westinghouse Communications ("Westinghouse"), at that time the holder of IXC Certificate No. 2481, and RSL USA filed a joint petition with the Commission for approval of the transfer of the assets of Westinghouse to RSL USA (the "Joint Petition"). Rather than requesting that the Commission cancel IXC Certificate No. 2481 and that the Commission acknowledge RSL USA's new fictitious name, RSL USA d/b/a Westinghouse Communications, on RSL USA's existing IXC certificate, RSL USA and Westinghouse requested that the Commission transfer IXC Certificate No. 2481 from Westinghouse to RSL USA. The Commission granted the Joint Petition by order dated November 13, 1998. See In re: Request for approval of transfer of assets and Interexchange Telecommunications Certificate No. 2481 and name change from Westinghouse Electric Corp. d/b/a Westinghouse Communications to RSL COM U.S.A., Inc. d/b/a Westinghouse Communications, 98 F.P.S.C. 11:86, Docket No. 981057-TI, Order No. PSC-98-1501-FOF-TI (Nov. 13, 1998). As a result, RSL USA currently holds two IXC certificates and has been assigned two separate company codes by the Commission: (1) Company Code TI401 for RSL USA, and (2) Company Code TJ191 for RSL USA d/b/a Westinghouse Communications.

5. The issuance by the Commission of two IXC certificates, and the assignment of two different company codes, to RSL USA, has created confusion

with respect to the regulatory assessment fees owed by RSL USA to the Commission. Specifically, for the period covering January 1, 1998 to December 31, 1998, RSL USA received three Interexchange Company Regulatory Assessment Fee Returns ("Fee Returns"): (1) a Fee Return for RSL USA (Company Code TI401); (2) a Fee Return for Westinghouse (Company Code TI950) for the period from January 1, 1998 through December 4, 1998; and (3) a Fee Return for RSL USA d/b/a Westinghouse Communications (Company Code TJ191) for the twenty-six day period from December 5, 1998 to December 31, 1998.

6. On January 26, 1999, RSL USA submitted a payment to the Commission of \$1,888.00 to cover the regulatory assessment fees owed by Westinghouse (Company Code TI950) for the pro-rated 1998 year.

7. On March 16, 1999, RSL USA submitted a payment to the Commission of \$216.92 to cover the regulatory assessment fees owed by RSL USA (Company Code TI401) for the 1998 year, which payment included all penalties and interest required due to RSL USA's late payment. RSL USA's payment was based on all of RSL USA's gross revenues derived from intrastate business during 1998, including gross revenues attributed to RSL USA doing business as Westinghouse Communications from December 5, 1998 through December 31, 1998.

8. Due to the confusion caused by the issuance of two IXC certificates and the assignment of two company codes to RSL USA, the company was not aware that the Commission required an additional Fee Return for RSL USA d/b/a Westinghouse Communications, and believed that the additional Fee Return was

issued in error. Accordingly RSL USA did not submit a separate payment for the twenty-six day period for Company Code TJ191.

9. For the period covering January 1, 1999 to December 31, 1999, RSL USA received two Fee Returns, one for RSL USA (Company Code TI401), and one for RSL USA d/b/a Westinghouse Communications (Company Code TJ191). On February 1, 2000, RSL USA submitted a payment to the Commission of \$1360.45 to cover the fees owed by RSL USA (Company Code TI401) for the 1999 year, which fee included all penalties and interest required for late payment. A copy of this Fee Return is attached hereto as Exhibit "A." On the same date, RSL USA submitted a Fee Return without payment for RSL USA d/b/a Westinghouse Communications (Company Code TJ191). A copy of this Fee Return is attached hereto as Exhibit "B." The Fee Return for RSL USA d/b/a Westinghouse Communications (Company Code TJ191) reports zero gross intrastate operating revenue, since RSL USA's Fee Return reports all of the company's gross intrastate operating revenues, including those revenues derived from RSL USA doing business as Westinghouse Communications.

10. On December 23, 1999, the Commission instituted this proceeding to cancel IXC Certificate No. 2481 for RSL USA d/b/a Westinghouse Communications' failure to pay regulatory assessment fees pursuant to Rule 25-4.0161, Florida Administrative Code.

**REQUEST FOR CANCELLATION OF IXC CERTIFICATE NO. 2481
AND AMENDMENT OF CERTIFICATE NO. 4068**

11. To resolve the confusion resulting from RSL USA holding two IXC certificates and being assigned two separate company codes, RSL USA requests that the Commission cancel IXC Certificate No. 2481 and disassociate RSL USA from Company Code TJ191.

12. RSL USA will continue to operate pursuant to the terms and conditions of IXC Certificate No. 4068 and will continue to utilize the fictitious name Westinghouse Communications for certain of its operations in the Florida. Accordingly, RSL USA also requests that upon cancellation of IXC Certificate No. 2481, the Commission amend IXC Certificate No. 4068 to change the name on the certificate from "RSL COM U.S.A., Inc." to "RSL COM U.S.A., Inc. d/b/a Westinghouse Communications."

13. This request for cancellation of IXC Certificate No. 2481, and for amendment of IXC Certificate No. 4068 to reflect RSL USA's fictitious name, will serve the public interest by eliminating the Commission's administrative burden of tracking two certificates issued to the same company, and by avoiding any customer confusion that may occur as the result of RSL USA's duplicative certification by the Commission. This action by the Commission should also resolve the confusion that has occurred in the past relating to the filing of Fee Returns and the payment of regulatory assessment fees by RSL USA.

14. RSL USA has satisfied all criteria for voluntary cancellation of IXC Certificate No. 2481 required by Rule 26-24.474(2), Florida Administrative Code.

As described above, although RSL USA d/b/a Westinghouse Communications (Company Code TJ191) has not separately submitted a Fee Return or payment of regulatory assessment fees to the Commission for the period beginning December 5, 1998 to present, all gross intrastate revenues attributable to RSL USA's operations under the fictitious name Westinghouse Communications have been reflected in the Fee Returns filed, and the regulatory assessment fees paid, by RSL USA (Company Code T1401). Because RSL USA will continue to do business under both "RSL U.S.A., Inc." and its fictitious name, "Westinghouse Communications," the cancellation of IXC Certificate No. 2481 and the amendment of IXC Certificate No. 4068 will be transparent to RSL USA's customers. Thus, there is no need for issuance of final bills to customers or to notify customers of the cancellation of IXC Certificate No. 2481.

PETITION FOR PARTIAL WAIVER OF RULE 25-4.0161

15. Rule 25-4.0161 requires each telecommunications company to remit a regulatory assessment fee to the Commission based on its gross operating revenue. The fee is to be accompanied by a Fee Return. Rule 25-4.0161 further provides that, regardless of the minimum gross operating revenue of a company, a minimum annual regulatory assessment fee of \$50 shall be imposed. See Fla. Admin. Code R. 25-4.0161(1).

16. Rule 25-4.0161 implements Section 350.113 and 364.336, Florida Statutes. Section 350.113 requires each company regulated by the Commission to pay a regulatory assessment fee. Section 364.336 requires each telecommunications

company licensed by the Commission and operating for any part of the preceding six month period to pay a regulatory assessment fee to the Commission.

17. RSL USA requests a permanent waiver of Rules 25-4.0161 as applied to RSL USA d/b/a Westinghouse Communications (Company Code TJ191) for the period commencing December 5, 1998 and concluding on the date on which the Commission issues a final decision regarding this Petition.

18. The underlying purpose of the implementing statutes has been served because RSL USA has paid regulatory assessment fees to the Commission for all of its gross intrastate operating revenues during the period at issue, including those revenues derived from its operations as RSL USA d/b/a Westinghouse Communications.

19. A strict application of Rule 25-4.0161 would lead to an unreasonable, unfair, and unintended result in this instance, because a strict application of the rule would require RSL USA to pay regulatory fees for an entity that in reality does not exist. Moreover, a strict application of the rule would create a substantial hardship on RSL USA and constitute a violation of principles of fairness, since it would require RSL USA to pay duplicative fees for RSL USA (Company Code T1401) and RSL USA d/b/a Westinghouse Communications (Company Code TJ191), when in fact both are the same entity.

WHEREFORE, RSL USA requests that the Commission:

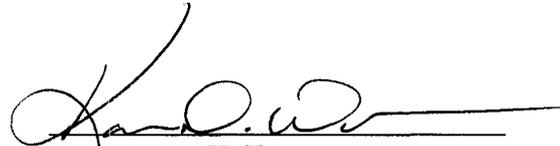
- (a) cancel IXC Certificate No. 2481;

(b) amend IXC Certificate No. 4068 to change the name on the certificate from "RSL COM U.S.A., Inc." to "RSL COM U.S.A., Inc. d/b/a Westinghouse Communications";

(c) waive Rule 25-4.0161, to the extent that it requires the submission of a separate Fee Return and the payment of separate regulatory assessment fees by RSL USA d/b/a Westinghouse Communications (Company Code TJ191); and

(d) grant such other relief as the Commission deems appropriate.

Respectfully submitted,



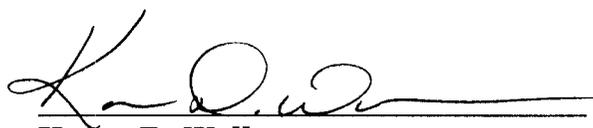
Karen D. Walker
Florida Bar No. 0982921
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Tallahassee, Florida 32302
Tel: (850) 224-7000
Fax: (850) 224-8832
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2100 Pennsylvania Ave., NW
Suite 400
Washington, DC 20037-3202
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Fax: (202) 828-1868
E-mail: doconnor@hklaw.com

**Attorneys for RSL COM U.S.A.,
Inc. d/b/a Westinghouse
Communications**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been hand delivered to Kimberley Pena, Florida Public Service Commission, Division of Legal Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and to Carroll Webb, Executive Director and General Counsel, Joint Administrative Procedures Committee, Holland Building, Room 120, Tallahassee, Florida 32399-1300 all on this 9th day of March, 2000.


Karen D. Walker

TAL1 #213723 v1

Florida Public Service Commission

(See Filing Instructions on Back of Form)

STATUS:

- Actual Return
- Estimated Return
- Amended Return

TI401
RSL COM U.S.A., Inc.
 430 Park Avenue, 5th Floor
 New York, NY 10022

PERIOD COVERED:
 01/01/1999 TO 12/31/1999

FOR PSC USE ONLY

Check# _____

\$ _____ 0603001
 _____ 003001

\$ _____ P
 _____ 0603001
 _____ 004011

\$ _____ I

Postmark Date _____

Initials of Preparer _____

Please Complete Below If Official Mailing Address Has Changed

 (Name of Company) (Address) (City/State) (Zip)

LINE NO.	ACCOUNT CLASSIFICATION	FLORIDA GROSS OPERATING REVENUE	INTRASTATE REVENUE
1.	Long Distance Services	\$ 5,900,843	\$ 1,062,152
2.	Access Services	_____	_____
3.	Private Line Services	_____	_____
4.	Leased Facilities & Circuits Services	_____	_____
5.	Miscellaneous Services	_____	_____
6.	TOTAL Telephone Services	\$ 5,900,843	\$ 1,062,152
7.	LESS: Amounts Paid to Other Telecommunications Companies* (see "2. Fees" on back) (Bell Search + GTE)	(390,470)	(155,188)
8.	TOTAL REVENUES FOR Regulatory Assessment Fee Calculation	_____	906,964
9.	Regulatory Assessment Fee Due (Multiply Line 8 by 0.0015)	_____	1,360.45
10.	Penalty for Late Payment (see "3. Failure to File by Due Date" on back)	_____	_____
11.	Interest for Late Payment (see "3. Failure to File by Due Date" on back)	_____	_____
12.	TOTAL AMOUNT DUE	_____	\$ 1,360.45

* These amounts must be intrastate only and must be verifiable.

AS PROVIDED IN SECTION 364.336, FLORIDA STATUTES, THE MINIMUM ANNUAL FEE IS \$50

CURRENT COMPANY STATUS

() Facilities-Based Carrier Reseller () Call Aggregator
 () Alternate-Operator Service () Reseller () Other: _____

BILLING INFORMATION

Complete below if billing agent if other than yourself.

Billing Concepts, Inc 7411 John Smith Dr., San Antonio, TX 78229 210.949-7000
 (Name) (Address: City/State/Zip) (Telephone)

What is the total amount of customer deposits collected?
 Amount: \$ _____ for 19 _____ N/A

What is the total amount of bond held (if applicable)?
 Amount: \$ _____ Expires: _____ N/A

COMPANY INFORMATION

Do you lease telecommunications' facilities? YES () NO
 If YES, who do you lease these facilities from? Name: **Various**

Address: _____

I, the undersigned owner/officer of the above-named company, have read the foregoing and declare that to the best of my knowledge and belief the above information is a true and correct statement. I am aware that pursuant to Section 837.06, Florida Statutes, whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his/her duty shall be guilty of a misdemeanor of the second degree.

Michael W. O'Brien Regulatory Compliance Mgr. 31 Jan 2000
 (Signature of Company Official) (Title) (Date)

Michael W. O'Brien
 (Preparer of Form - Please Print Name)

Telephone Number (412) 244-6540 Fax Number (412) 244-6619
 F.E.I. No. 11-3044583

INVOICE NO	INVOICE DATE	DESCRIPTION	DISCOUNT AMOUNT	NET AMOUNT
01-FEB-00	31-JAN-00	TAC REG ASSESS FEE 1999-11401	0.00	1,360.45

RSL COM U.S.A., INC. 35869 EVERGREEN DATA SYSTEMS INC
PLEASE DETACH AND RETAIN THIS STATEMENT AS YOUR RECORD OF PAYMENT.

Thank You

0.00 1,360.45

RSL COM
RSL COM U.S.A., INC.
5550 Tequesta Canyon Blvd, Suite 250
Woodland Hills, CA 91367

CITIBANK
Walden Creek, California
90-7172/0022

No. 035869

CHECK DATE	CHECK NUMBER	CHECK AMOUNT
01-FEB-00	35869	*****1,360.45

One Thousand Three Hundred Sixty Dollars And 45 Cents *****

TO THE ORDER OF
FLORIDA PUBLIC SERVICE
2540 SHUMARD OAK BLVD
TALLAHASSEE, FL 32399-7019

Patricia D. Meyer

AVOID PENALTY AND INTEREST CHARGES. THE REGULATORY ASSESSMENT FEE RETURN MUST BE FILED ON OR BEFORE 01/31/2000

Interexchange Company Regulatory Assessment Fee Return

Florida Public Service Commission

(See Filing Instructions on Back of Form)

STATUS:

- Actual Return
- Estimated Return
- Amended Return

TJ191
Westinghouse Communications
RSL COM U.S.A., Inc.
430 Park Avenue, 5th Floor
New York, NY 10022

FOR FSC USE ONLY

Check# _____

\$ _____ 0603001
003001

\$ _____ P
0603001
004011

\$ _____ I

Postmark Date: _____

Initials of Preparer: _____

PERIOD COVERED:
01/01/1999 TO
12/31/1999

Please Complete Below If Official Mailing Address Has Changed

(Name of Company)

(Address)

(City/State)

(Zip)

LINE NO.	ACCOUNT CLASSIFICATION	FLORIDA	
		GROSS OPERATING REVENUE	INTRASTATE REVENUE
1.	Long Distance Services	\$ 0	\$ 0
2.	Access Services		
3.	Private Line Services		
4.	Leased Facilities & Circuits Services		
5.	Miscellaneous Services		
6.	TOTAL Telephone Services	\$	\$
7.	LESS: Amounts Paid to Other Telecommunications Companies* (see "2. Fees" on back)		
8.	TOTAL REVENUES For Regulatory Assessment Fee Calculation		
9.	Regulatory Assessment Fee Due (Multiply Line 8 by 0.0015)		
10.	Penalty for Late Payment (see "3. Failure to File by Due Date" on back)		
11.	Interest for Late Payment (see "3. Failure to File by Due Date" on back)		
12.	TOTAL AMOUNT DUE		

* These amounts must be intrastate only and must be verifiable.

AS PROVIDED IN SECTION 364.336, FLORIDA STATUTES, THE MINIMUM ANNUAL FEE IS \$50

CURRENT COMPANY STATUS

() Facilities-Based Carrier () Reseller () Call Aggregator

() Alternate-Operator Service () Reseller () Other: Company sold to RSL COM USA, Inc
on 14 July 1998. (TX401)

BILLING INFORMATION

Complete below if billing agent if other than yourself.

(Name)

(Address: City/State/Zip)

(Telephone)

What is the total amount of customer deposits collected?
Amount: \$ _____ for 19 _____

What is the total amount of bond held (if applicable)?
Amount: \$ _____ Expires: _____

COMPANY INFORMATION

Do you lease telecommunications facilities? () YES () NO

If YES, who do you lease these facilities from? Name: _____

Address: _____

I, the undersigned owner/officer of the above-named company, have read the foregoing and declare that to the best of my knowledge and belief the above information is a true and correct statement. I am aware that pursuant to Section 837.06, Florida Statutes, whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his/her duty shall be guilty of a misdemeanor of the second degree.

Michael W. O'Brien
(Signature of Company Official)

Regulatory Compliance Mgr.
(Title)

31 Jan 2000
(Date)

Michael W. O'Brien
(Preparer of Form - Please Print Name)

Telephone Number 412 244-6540 Fax Number 412 244-6619

F.E.I. No. N/A

Law Offices

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February 1, 2000

DAVID A. O'CONNOR
202-828-1889

Internet Address:
doconnor@hklaw.com

VIA FACSIMILE (850) 413-7118

Ms. Blanca S. Bayó
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: **Docket No. 992008-TT**
RSL COM U.S.A., Inc. d/b/a Westinghouse Communications

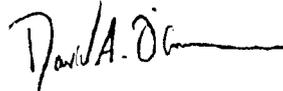
Dear Ms. Bayó:

The law firm of Holland & Knight LLP serves as regulatory counsel for RSL COM U.S.A., Inc. d/b/a Westinghouse Communications, the party to the above-referenced proceeding. Please send copies of all prior and future correspondence concerning this proceeding to the undersigned counsel.

Should you have any questions, please contact the undersigned.

Very truly yours,

HOLLAND & KNIGHT LLP



David A. O'Connor
Counsel for RSL COM U.S.A., Inc.
d/b/a Westinghouse Communications

RECEIVED-FPSC

60 FEB - 1 AM 11:31

REGULATORY AND REPORTING

Done 2/01/00

Law Offices

HOLLAND & KNIGHT LLP

2100 Pennsylvania Avenue, N. W.
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202-955-3000
FAX 202-955-5564

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West Palm Beach

FACSIMILE

TO:

Ms. Blanca S. Bayo

NAME

**Florida Public Service
Commission**

COMPANY/FIRM

Tallahassee

CITY

Florida

STATE

850-413-7118

FAX NUMBER

TELEPHONE NUMBER

FROM:

David A. O'Connor

NAME

202-828-1889

TELEPHONE NUMBER

2

TOTAL NUMBER OF PAGES (Including Cover Sheet)

MESSAGE:

If you did not receive all of the pages or find that they are illegible, please call

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This facsimile, along with any documents, files, or attachments, may contain information that is confidential, privileged, or otherwise exempt from disclosure. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, printing, distribution or use of any information contained in or attached to this facsimile is **STRICTLY PROHIBITED**. If you have received this facsimile in error, please immediately notify us by facsimile or by telephone at the numbers stated above, and destroy the original facsimile and its attachments without reading, printing, or saving in any manner. Your cooperation is appreciated. Thank you.

FOR THE RECORD:

DATE: **February 1, 2000**

URGENCY: **SUPER RUSH** RUSH REGULAR

FAXED BY:

AMOUNT:

CLIENT #: **059005**

MATTER #: **00001**

CONFIRMED: YES NO

NAME: TIME: