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March 12, 2001

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Re: Docket No.: 000075-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Testimony and Exhibit of Joseph P. Gillan on Behalf of Florida Competitive Carriers Association

Please acknowledge receipt of the above on the extra copy and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods
to compensate carriers for exchange of
traffic subject to Section 251 of the
Telecommunications Act of 1996.

Docket No.: 000075-TP
Filed: March 12, 2001

TESTIMONY AND EXHIBIT

OF

JOSEPH P. GILLAN

ON BEHALF OF

FLORIDA COMPETITIVE CARRIERS ASSOCIATION

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1 **Q. Please state your name and business address.**

2 A. My name is Joseph Gillan. My business address is P.O. Box 541038, Orlando,
3 Florida 32854. I am an economist with a consulting practice specializing in
4 telecommunications.

5 **Q. Please briefly outline your educational background and related experience.**

6 A. I am a graduate of the University of Wyoming where I received B.A. and M.A.
7 degrees in economics. From 1980 to 1985, I was on the staff of the Illinois
8 Commerce Commission where I had responsibility for the policy analysis of issues
9 created by the emergence of competition in regulated markets, in particular the
10 telecommunications industry. While at the Commission, I served on the staff
11 subcommittee for the NARUC Communications Committee and was appointed to the
12 Research Advisory Council overseeing NARUC's research arm, the National
13 Regulatory Research Institute.

14 In 1985, I left the Commission to join U.S. Switch, a venture firm organized to
15 develop interexchange access networks in partnership with independent local
16 telephone companies. At the end of 1986, I resigned my position of Vice President-
17 Marketing/Strategic Planning to begin a consulting practice. Over the past decade,
18 I have provided testimony before more than 35 state commissions, four state
19 legislatures, the Commerce Committee of the United States Senate, and the
20 Federal/State Joint Board on Separations Reform. I currently serve on the Advisory
21 Council to New Mexico State University's Center for Regulation.

22 **Q. On whose behalf are you testifying?**

1 A. I am testifying on behalf of the Florida Competitive Carrier Association (FCCA).
2 The FCCA represents the interests of competitive carriers seeking to offer local, long
3 distance and advanced data services to Florida consumers and businesses.

4 **Q. What is the purpose of your testimony?**

5 A. The purpose of my testimony is to address Issue 16:

6 (a) What is the definition of Internet Protocol (IP) telephony?

7 (b) How should IP telephony be compensated?

8 The FCCA is jointly sponsoring Dr. Selwyn to address the remaining issues
9 in this proceeding concerning local compensation more generally.

10 **Q. Briefly describe what is meant by "IP Telephony."**

11 A. As with any emerging technology, there is no single consensus definition of
12 "IP telephony" -- but then there is no immediate need for one. As I explain
13 below, "IP telephony" is short hand for a continuum of applications (and, just
14 as importantly, *potential* applications) that involve the transmission of voice
15 using packet technology, where the protocol used for interoperability of the
16 packet network is the Internet Protocol (IP). Anchoring one end of the
17 continuum is "pure" IP telephony - that is, the use of IP packet networks to
18 transmit a simple voice service. However, the real value of packet technology
19 is its ability to integrate data and voice together, making possible hybrid
20 enhanced services. It is here, where voice becomes but a component of a
21 more sophisticated arrangement, that the future of IP telephony is likely to be
22 determined.

1 Two themes form the principal message of my testimony. First, when
2 a service contains *both* an information and voice capability, the Federal
3 Communications Commission requires that the *entire* service be treated as an
4 information service. On this – the growing end of the "IP Telephony"
5 continuum – the FCC has already established a national framework that
6 defines such services as "information" services and exempt from access
7 charges. Where the FCC has not yet ruled – i.e., pure IP-Telephony services
8 with no information component -- there is no indication yet that such
9 primitive services are commercially viable. For a wide range of legal,
10 economic and policy reasons discussed below, I recommend that the
11 Commission allow the market to develop, without imposing legacy regulation
12 and access-charge based compensation schemes on this new technology.

13 **Q. Please explain packet technology and its relationship to "Internet**
14 **Protocol."**

15 A. Packet technology divides any communication (voice or data) into individual
16 digital "packets" that are routed independently to a destination address.
17 Because these packets may traverse several different networks to reach their
18 final destination, a standard protocol is used so that these networks may
19 interoperate.

20 The protocol that is today's industry standard is known as the Internet
21 protocol, or IP. The most prominent use of this protocol is the "network" that
22 carries its name, i.e., the Internet. The Internet --actually a collection of

1 networks that have agreed to exchange traffic -- was made possible because
2 of the adoption of this standard protocol enabling packet-based networks to
3 interconnect in a known and reliable manner. The use of this basic protocol,
4 however, extends beyond the "Internet" to also support other packet-based
5 networks.

6 What is important about packet technology is that its reduces *any*
7 communication to a common-denominator, thereby enabling information
8 (i.e., data and voice) to be seamlessly integrated together. Because packet
9 technology is indifferent to a communications' original form, it is ideally
10 suited to support "convergence services" that combine communications and
11 information capability together.

12 **Q. Is it important to appreciate how IP-based services can combine voice
13 and data together?**

14 A. Yes. Although the Commission has framed the issue to address "IP
15 telephony," this formulation actually masks the commercial importance of the
16 technology. As I noted above, IP telephony describes a continuum of
17 applications that range from pure voice to more sophisticated arrangements.
18 Understanding this continuum is critical because where a service resides on
19 the continuum determines not only its regulatory status, but is likely to
20 determine its commercial success as well. As I explain below, those services
21 most likely to find commercial success will be hybrid services that combine
22 a voice and information capability. Importantly, these hybrid services are

1 classified as information services and excused from conventional regulation
2 (and access charge compensation) by FCC order.

3 **Q. Can you give a few examples of services that would be considered**
4 **"hybrids" that combine voice and information capability?**

5 A. Yes. One example would be an integrated voice-messaging system. A
6 number of entities offer such capabilities. Typically, an integrated voice-
7 messaging system assigns each subscriber a local telephone number and an
8 800 number. These numbers are then used by others to leave messages for
9 the subscriber, and by the subscriber to access a server (if using a phone) or
10 over the Internet.

11 When a calling party calls the subscriber's number, the calling party
12 would be given a number of choices. The caller can leave a simple message
13 or the caller can also leave a "call-back" number using its touch-tone phone.
14 If the subscriber has activated the follow-me option, then some integrated
15 messaging systems will offer the calling party the choice of waiting while the
16 call is forwarded to whatever number(s) the subscriber has chosen. With
17 such a feature mix, the calling party is provided a number of communication
18 and storage options. In addition, if the service recognizes a "fax tone" from
19 the calling party's fax machine, it may accept a fax and place it in storage.
20 Some services also store the subscriber's email via connections with the
21 Internet.

22 Another example is "Tell Me." "Tell Me" can be reached by dialing

1 1-800-555-TELL. The service uses voice recognition software and various
2 Internet links to access information about the weather, movies, restaurants
3 and other topics. One of its capabilities is to connect a customer to a
4 restaurant for reservations after providing the listener some basic information.
5 While this application may bear similarities to conventional "telephony" –
6 after all, you *can* make your dinner reservation once connected – it is also
7 clear that "Tell Me" is fundamentally an information service (even though it
8 offers a voice telephony capability). (I note that while I have used this
9 service as an example of an IP-based information service, it may well be that
10 it is being offered today using conventional access arrangements -- even
11 paying conventional access charges -- for operational simplicity).

12 Q. Are these the only types of IP services that have been introduced?

13 A. No, some have introduced more primitive IP telephony services that have
14 focused more on providing voice capability, and less on the information-
15 enabling features of the IP gateway. These "pure" IP telephony arrangements,
16 however, are generally first-generation offerings that have not demonstrated
17 commercial success. In several instances, these "pure IP telephony" services
18 were introduced so that the carrier could gain experience before expanding
19 to more complete services described above.

20 **Q. Has the FCC adopted a basic framework that determines whether a**
21 **service should be considered an information service (and thus exempt**
22 **from the application of access charges)?**

1 A. Yes. The applicable framework is explained most concisely in the Federal
2 Communication Commission's 1998 Report to Congress (In the Matter of
3 Federal-State Joint Board on Universal Service, "*Report to Congress*", CC
4 Docket 96-45, FCC 98-67, Adopted April 10, 1998). This Order addressed,
5 among other topics, the definition of "information service," the FCC's policy
6 exempting such services from access charges, and the unique issues presented
7 by new technology, including so-called "IP telephony."

8 **Q. What were the most important conclusions made by the FCC in its**
9 **Report to Congress?**

10 A. The first important conclusion reached by the FCC was that the
11 Telecommunications Act of 1996 established two, mutually exclusive, service
12 categories. A service is *either* a telecommunications service, or it is an
13 information service. As the FCC explained (Report to Congress, ¶39,
14 footnote omitted):

15 After careful consideration of the statutory language and
16 its legislative history, we affirm our prior findings that the
17 categories of "telecommunications service" and
18 "information service" in the 1996 Act are mutually
19 exclusive. Under this interpretation, an entity offering a
20 simple, transparent transmission path, without the
21 capability of providing enhanced functionality, offers
22 "telecommunications." By contrast, when an entity offers
23 transmission incorporating the "capability for generating,
24 acquiring, storing, transforming, processing, retrieving,
25 utilizing, or making available information," it does not
26 offer telecommunications. Rather, it offers an
27 "information service" even though it uses
28 telecommunications to do so. We believe that this reading
29 of the statute is most consistent with the 1996 Act's text,

1 its legislative history, and its procompetitive, deregulatory
2 goals.
3

4 **Q. Why is it important to understand the basic dichotomy between**
5 **"information" and "telecommunications" services?**

6 A. Information services (previously labeled enhanced services) are permitted to
7 interconnect through local business services rather than the interstate access
8 tariffs. (See MTS and WATS Market Structure, 97 FCC 2d 682, 715, 1983,
9 "MTS/WATS Order." See also Amendments of Part 69 of the Commission's
10 Rules Relating to Enhanced Service Providers, 3 FCC Rcd 2631, 2635 n. 8,
11 2637 n. 53, 1988, "ESP Exemption Order," Implementation of the Local
12 Competition Provisions in the Telecommunications Act of 1996, CC Docket
13 No. 96-98; Inter-Carrier Compensation for ISP-Bound Traffic, CC Docket No.
14 99-68, FCC 99-98, at ¶ 1, n.1, Feb. 26, 1999). In addition, as information
15 services, such offerings are not regulated as telecommunications services.

16 **Q. Are "IP Telephony" services information services or telecommunications**
17 **services.**

18 A. At present, there is no complete answer to this question. As I indicated, the
19 term IP telephony typically applies to a continuum of services, some which are
20 pure voice, while most others combine voice with some information
21 capability. Importantly, this continuum *may* straddle the line between
22 telecommunications and information services – in part, based on whether an
23 information capability is part of the service and, in part, because the FCC has

1 not yet ruled on how "pure IP telephony services" should be regulated.

2 Attached is a simple chart (Exhibit ___ (JPG-1) that overlays this regulatory
3 framework on the continuum of IP Telephony services.

4 **Q. What are the most significant implications of this regulatory framework**
5 **with respect to the continuum of IP Telephony services?**

6 A. First, and most critically, any service that includes an information component
7 is considered an information service in its entirety (Report to Congress, ¶¶'s
8 58 and 59, footnotes omitted):

9 The Commission has considered the question of hybrid services
10 since *Computer I*, when it first sought to distinguish
11 "communications" from "data processing." *Computer II* provided
12 a framework for classifying such services, under which the
13 offering of enhanced functionality led to a service being treated as
14 "enhanced" rather than "basic." An offering that constitutes a
15 single service from the end user's standpoint is not subject to
16 carrier regulation simply by virtue of the fact that it involves
17 telecommunications components.

18 ***

19 Stated another way, if the user can receive nothing more than pure
20 transmission, the service is a telecommunications service. If the
21 user can receive enhanced functionality, such as manipulation of
22 information and interaction with stored data, the service is an
23 information service.

24
25 Secondly, it is also important to emphasize the conclusion that the FCC *did*
26 *not* reach – i.e., whether even a pure "phone-to-phone IP telephony" service
27 would be a telecommunications (as opposed to an information) service.

28 Specifically, the FCC found (Report to Congress, ¶83):

29 The record currently before us suggests that certain "phone-to-
30 phone IP telephony" services lack the characteristics that would

1 render them "information services" within the meaning of the
2 statute, and instead bear the characteristics of "telecommunications
3 services." We do not believe, however, that it is appropriate to
4 make any definitive pronouncements in the absence of a more
5 complete record focused on individual service offerings.
6

7 The FCC has clearly defined the corners of the IP telephony debate, excusing
8 hybrid services from traditional regulation (and access charges), while leaving
9 open the possibility that pure IP telephony *might* be subject to regulation in the
10 future. The relevant question here is whether the Florida Commission should
11 attempt to address this remaining ambiguity in the federal system and impose
12 regulation on this emerging technology and market. As I explain, below the
13 answer is no.

14
15 **Q. Should the Commission impose traditional regulation (and access**
16 **charges) on IP Telephony?**

17 A. No. To begin, there is only one area where the Commission could apply
18 regulation, and that is the case of pure IP Telephony. The mere existence of
19 a "gray area," however, does not justify regulation for regulation's sake. The
20 future of IP is likely to be services that blend voice and information
21 capabilities in hybrid arrangements that are clearly exempt from regulation.
22 While IP technology *can* support pure-IP Telephony services, there is no
23 market evidence that such services are substitutes for conventional long
24 distance services or commercially sustainable.

1 Technology and market conditions are in flux and providing the market more
2 time to evolve is the best approach. As former FCC Chairman Kennard has
3 explained (*Kennard Pledges No Regulation for Internet Telephony*,
4 Washington Internet Daily, May 25, 2000, page 2):

5
6 imposing access charges on IP telephony, is not the
7 direction we should be heading. It seeks to impose a legacy
8 system on what is a new and emerging technology ...
9 Internet telephony is still technically challenged. It's still
10 in the development stage. The last thing we want to do is
11 start inventing some regulatory paradigm or imposing an
12 old regulatory paradigm on this service before its even
13 gotten out of the box.
14

15 **Q. What would be the effect of a finding that even "pure IP telephony**
16 **services" are telecommunication services, and therefore subject to access**
17 **charges?**

18 A. First, there would be a chilling effect on entry and innovation as these inflated
19 were imposed on new services with no proven market demand. Access
20 charges were introduced to a mature market, where prices were already
21 inflated to provide substantial revenues to the ILEC. Here, the market is
22 nascent (at best), and faces substantial hurdles that would only be made worse
23 with access charges.

24 Second, and equally disturbing, would be the delay and uncertainty of
25 attempting to determine, on an application-by-application basis, whether a
26 particular IP service is a hybrid service (and, therefore, without question an

1 information service) or a "pure" IP telephony service (and potentially subject
2 to *intrastate* access charges). In this regard, it is useful to understand that the
3 Commission cannot determine whether *interstate* access charges apply to any
4 service. Given the problems created by disparate federal and state regimes, it
5 is not clear that a state commission *could* even take action with respect to
6 intrastate access charges without raising issues of preemption.

7 Against these very serious competitive harms, what would be the
8 possible gain? The Commission should understand that the number of actual
9 services – and, therefore, the amount of traffic -- that is ever likely to be
10 designated as "pure IP telephony" will be relatively small. A major benefit of
11 IP-technology is its ability to integrate voice with other applications – in other
12 words, to offer hybrid services. Plain-vanilla telecommunications will likely
13 still be dominated by plain-vanilla providers, using plain-vanilla (read circuit-
14 switched) technology.

15 There is *no* market evidence that pure IP telephony – i.e., "first
16 generation" IP telephony that has not evolved to a hybrid arrangement – is a
17 sustainable market strategy, or that *any* IP-Telephony will seriously challenge
18 conventional service. At most, initial offerings appear to be little more than
19 the necessary first steps of a learning process, positioning providers to move
20 on to more advanced offerings.

21 **Q. Why do you say that imposing an access-charge based compensation**
22 **scheme on IP Telephony would chill innovation?**

1 A. By definition, little is known about customer demand for new products, and
2 bringing new services to market is both costly and risky. Hoisting the arcane
3 system of access charges onto these services could substantially increase their
4 cost, thereby reducing a carrier's incentive to take the risk to bring new
5 services to market.

6 Imagine the effect that access charges would have had on the
7 development of the Internet. Would consumers have been willing to try this
8 new technology if its price had been driven by access charges? If not, would
9 it have ever reached the critical mass necessary to become a daily part of our
10 lives? As the FCC has noted (Access Charge Reform, 12 FCC Rcd 15982,
11 16133, 1997, "*Access Charge Reform Order*", aff'd sub nom., *Southwestern*
12 *Bell Te. Co. v. FCC*, 153 F.3d 523, 8th Cir. 1998, quoting 47 U.S.C.
13 § 230(b)(2)):

14 We think it possible that had access rates applied to ISPs over the
15 last 14 years, the pace of development of the Internet and other
16 services may not have been so rapid. Maintaining the existing
17 pricing structure for these services avoids disrupting the still-
18 evolving information services industry and advances the goals of
19 the 1996 Act to "preserve the vibrant and competitive free market
20 that presently exists for the Internet and other interactive computer
21 services, unfettered by Federal or State regulation."
22

23 One of the most successful pricing decisions of our time was the decision to
24 *not* impose the burden of high access charges on emerging new enhanced
25 services. This decision enabled new providers to innovate and experiment,
26 opening the door to the information-rich world we are about to enter. Similar

1 considerations call for the same decision here. We are at the very beginning
2 of the emergence of IP-based services. This next-evolution should be
3 permitted to take root and grow without in the most efficient and cost-effective
4 manner possible, without the burden imposed by access charges.

5 **Q. Are there other reasons that the Commission should not impose access**
6 **charges on IP Telephony?**

7 A. Yes. Overall, I believe it is useful to encourage the development of
8 information services that can be accessed by consumers through the
9 convenience of the standard telephone (and not just the computer). The
10 telephone is the most successful "information appliance" ever introduced, with
11 a market penetration far beyond that achieved by the computer. Sound public
12 policy should *encourage* innovative services for consumers whose only form
13 of access is the conventional phone, as well as consumers that will
14 increasingly rely on more sophisticated "appliances" (such as computers or
15 advanced televisions) to obtain communication services.

16 I also note that most IP-based services connect to the local network
17 using high-speed digital connections, typically an ISDN line with a primary
18 rate interface (i.e., ISDN-PROS). Thus, even *assuming* that the case could be
19 made that the imposition of access charges on IP Telephony is justified, some
20 very practical questions would remain. What exactly would a FG-IP service
21 look like? What would be its rate elements? What services would it apply to?
22 How would charges be calculated? What would be the underlying cost

1 justification?

2 **Q. What do you recommend?**

3 A. I recommend that the Commission simply allow the market for IP-based
4 services to continue to evolve without attempting to impose legacy
5 compensation schemes – in particular, access charges – on these services. IP-
6 services using IP gateways should be able to freely interconnect as business
7 lines. The trend in such service-development is towards hybrid arrangements
8 that already qualify for such treatment, and there is no reason to conclude that
9 more primitive forms of *should* be subjected to access charges (even if they
10 lawfully *could*).

11 **Q. Does this conclude your testimony?**

12 A. Yes.

Basic Classification System of Communication Services

Category	Information Services		<<<?>>>	Telecommunications Services
Service Type	Pure Information Service	Hybrid/Mixed Services	Pure IP Telephony	Traditional Phone Services
Characteristics	A service capable of generating, acquiring, storing, transforming, processing, retrieving, utilizing or making available information via telecommunications.	Services that integrate an information capability with a telecommunications services	IP-based services that may resemble aspects of conventional services, but which also include an information services component	A simple transparent transmission path, without the capability of offering an information service
Compensation Regime	Service connects as a local exchange service		?	Exchange access or local exchange service

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Testimony and Exhibit of Joseph P. Gillan on behalf of FCCA has been furnished by hand delivery (*) or U.S. Mail this 12th day of March, 2001 to the following:

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