1		BELLSOUTH TELECOMMUNICATIONS, INC.
2		REBUTTAL TESTIMONY OF CLYDE L. GREENE
3		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4		DOCKET NO. 001797 - TP
5		MAY 23, 2001
6		
7	Q.	PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
8		BELLSOUTH TELECOMMUNICATIONS, INC.
9		
10	A.	I am Clyde L. Greene, Room 28A1, 600 N. 19th St., Birmingham, AL 35203.
11		My current position is Specialist, Wholesale Billing at BellSouth Billing, Inc.,
12		a wholly owned subsidiary of BellSouth Telecommunications, Inc. In that
13		role, I am responsible for overseeing the implementation of various changes to
14		BellSouth's Customer Records Information System ("CRIS") and Carrier
15		Access Billing System ("CABS").
16	0	DI EACE CLIMALA DICE MOLID DA CWODOLDID AND EMPEDIENCE
17	Q.	PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
18	A.	I graduated from the University of Alabama at Birmingham with a Bachelor of
19	Δ,	Science Degree in Electrical Engineering in 1990. I began my career at
20		BellSouth in July 1990 as an Administrative Assistant within the Network
21		•
22		Department with responsibility for mechanized call testing and call recording
23		trouble investigation. Since July 1994, I have served in various CABS support
24		roles within the billing organization. I am familiar with the billing services
25		provided by BellSouth Telecommunications to local competitors,
		interexchange carriers and retail end user customers.

1		
2	Q.	WHAT IS THE PURPOSE OF THE TESTIMONY YOU ARE FILING
3		TODAY?
4		
5	A.	My testimony rebuts the testimony filed by Covad witness Thomas M.
6		Koutsky. Specifically, I will address the testimony filed by this witness on
7		issues 31 and 32 (a). I will only address the billing system related parts of
8		issue 32 (a). BellSouth witness Cindy Cox will address the policy related parts
9		of issue 32 (a).
10		
11	Issue .	31: Should BellSouth send a complete electronic and paper bill within ten
12		business days of the bill date, and what will be the billing date of that bill?
13		
14	Q.	WHAT IS BELLSOUTH'S UNDERSTANDING OF THIS ISSUE?
15		
16	A.	This issue is a disagreement between BellSouth and Covad concerning the
17		setting of payment due dates for the bills that Covad receives from BellSouth.
18		BellSouth proposes that the payment due dates should be set based on the bill
19		date. Covad proposes that the payment due dates should be set based on the
20		date that the bills are received by Covad.
21		
22	Q.	COVAD STATES, ON PAGE 20 OF MR. KOUTSKY'S TESTIMONY,
23		"THIS PROPOSAL [COVAD'S] ENSURES THAT COVAD WILL HAVE
24		THIRTY DAYS TO PROCESS AND PAY A BILL ONCE IT HAS
25		RECEIVED IT IN THE AGREED-TO FORMAT." PLEASE COMMENT.

•										
2	A.	Mr. Koutsky's conclusion is plainly wrong, regardless of when Covad receives								
3		its bill. Covad currently receives both paper bills and magnetic tape bills.								
4		Attached as Exhibit CLG-R1 are sample Federal Express delivery confirmation								
5		forms for some of Covad's magnetic tape bills from BellSouth. To have as								
6		close to 30 days as possible to process and pay a bill, Covad should choose to								
7		receive its bills via electronic transmission. To date, it has not.								
8										
9		Under Covad's proposal, BellSouth could mail both the paper and electronic								
10		bill on the tenth day after the end of the billing period, which to Covad is								
11		acceptable, and Covad's payment would be due by the due date shown, e.g. 30								
12		days from the bill date, regardless of when Covad receives the actual bill. This								
13		makes Covad's proposal nonsensical. In one instance, Covad is willing to pay								
14		by the due date, in another they are not, and the bills could be received at								
15		exactly the same time in either instance.								
16										
17	Q.	ALSO ON PAGE 20, COVAD MAKES THE STATEMENT THAT								
18		"BELLSOUTH TIES PAYMENT OF A BILL TO THE 'BILL DATE' AND								
19		NOT THE ACTUAL DATE IN WHICH COVAD RECEIVES THE BILL."								
20		IS THIS AN UNUSUAL ARRANGEMENT?								
21										
22	A.	No. Although I do not have my own personal business, I do have bills. I have								
23		also looked at the BellSouth tariffs with regard to payment due dates. In								
24		addition, I have attached, as Exhibit CLG-R2, a copy of pages 1 and 481 of a								
25		bill from a large ALEC customer to BellSouth. The bill date for this bill is								

1		May 10, 2001, the bill was received by BellSouth on May 18, 2001, and the
2		payment due date is June 11, 2001. In each of the circumstances of which I am
3		aware, the bill is due in relationship to a due date, not in relationship to when
4		the bill is received. Moreover, how would bill receipt be monitored? Doing so
5		would be an unnecessary administrative nightmare, as well as a financial
6		burden to all companies involved.
7		
8		Bills sent out by BellSouth to IXC and all BellSouth customers are due in
9		relationship to a bill date and not in relationship to when the bill is received. I
10		have attached as Exhibit CLG-R3, pages 1 and 352 of a sample IXC bill for the
11		month of May 2001. In this example, the payment is due in relationship to the
12		bill date. The particular bill in this example is of a comparable size in pages as
13		one of Covad's larger bills.
14		
15	Q.	ON PAGE 22, MR. KOUTSKY PRESENTS AN EXAMPLE WHERE
16		BELLSOUTH GENERATES A PAPER BILL ON THE TENTH BUSINESS
17		DAY, DELAYS SENDING AN ELECTRONIC BILL FOR SOME PERIOD
18		OF TIME, AND COVAD WOULD STILL HAVE TO PAY ITS BILL BY
19		THE DUE DATE. PLEASE COMMENT.
20		
21	A.	Covad alleges that in this scenario it would only have eight to ten business
22		days to review and pay a paper bill. BellSouth makes available, upon request,
23		electronic transmission (not magnetic tape by mail) of billing information. If
24		Covad is concerned about the timeframe that is necessary to review a paper
25		bill, perhaps electronic transmission, as offered by BellSouth, would be a

1 viable alternative. In the case of electronic transmission, Covad would know 2 immediately whether they have received their bill and would be able to work 3 out any problems that may arise related to receiving the bill well within the 4 ten-day interval that BellSouth proposes for sending bills. 5 One point that I would like to make here is that something close to the reverse 6 7 of what Covad is suggesting in its example could also happen. BellSouth could get both an ALEC's paper and electronic bills out in a timely fashion, 8 but the ALEC could claim that the bills were not timely received and extend its 9 billing period. BellSouth is not suggesting that Covad would do this, but if 10 Covad's proposal is included in the parties' Interconnection Agreement, it 11 12 becomes available to all other ALECs. 13 Q. MR. KOUTSKY MAKES THE STATEMENT ON PAGE 22 OF HIS 14 TESTIMONY, "THAT IS NOT A COMMERCIALLY REASONABLE 15 REQUEST FOR A HIGH-VOLUME CUSTOMER LIKE COVAD." DOES 16 17 COVAD'S VOLUME HAVE ANYTHING TO DO WITH HOW IT IS 18 **BILLED?** 19 20 Α. Absolutely not. The size of an ALEC has nothing to do with BellSouth's obligation to provide nondiscriminatory service. What BellSouth offers 21 Covad, BellSouth must be ready to offer all ALECs. BellSouth has the same 22 general procedures for all of its customers. Having such standard billing 23 periods and payment due dates is the only method that makes common sense 24 for a business such as BellSouth, or Covad.

1 2 Q. ON PAGES 22, 23 AND 24, MR. KOUTSKY DISCUSSES "SIGNIFICANT BILLING PROBLEMS WITH BELLSOUTH'S BILLS." THAT COVAD 3 ALLEGEDLY HAS ENCOUNTERED. PLEASE COMMENT. 4 5 6 A. As with any process, some problems do exist with BellSouth's billing system. 7 However, because one of BellSouth's goals is to provide timely, accurate and 8 complete bills to each of our customers, we are committed to continuously improving our billing process. 9 10 Any customer that has a legitimate billing dispute should use BellSouth's 11 established billing dispute process. With this process, BellSouth does not 12 require Covad or any other customer to pay disputed charges until the disputes 13 have been resolved. If a dispute is resolved in the customer's favor, then the 14 15 customer is not required to pay the disputed charges and the charges will be credited to the customer's account. If the dispute is resolved in BellSouth's 16 favor, the customer is then required to pay the disputed charges. Of the 17 disputes that BellSouth has received from Covad, only a portion has been 18 resolved in Covad's favor. For example, Covad has disputed approximately 19 \$659,000 on their Unbundled Network Element (UNE) accounts as of April 20 2001. After investigating these disputes, BellSouth determined that 21 22 approximately \$263,000 should be resolved in Covad's favor. This amount 23 has been credited to Covad accounts. The remaining \$396,000 was determined

to be legitimate charges and the related disputes were denied. BellSouth has

not received any formal disputes from Covad related to billing on their

24

1		Collocation accounts. However, BellSouth and Covad are currently
2		discussing certain billing for collocation.
3		
4	Q.	WHAT DOES BELLSOUTH REQUEST OF THIS COMMISSION WITH
5		REGARD TO ISSUE 31?
6		
7	A.	BellSouth asks the Commission to deny Covad's request to significantly stray
8		from standard business practices with regard to payment of bills and asks that
9		the Commission accept BellSouth's proposed language on this issue.
10		
11	Issue	32(a): Should Covad be required to pay amounts in dispute as well as late
12		charges on such amounts?
13		
14	Q.	ON PAGE 24 OF HIS TESTIMONY, MR. KOUTSKY STATES THAT
15		THERE ARE "SIGNIFICANT PROBLEMS WITH BELLSOUTH'S
16		BILLING SYSTEMS FOR UNE'S AND COLLOCATION." PLEASE
17		COMMENT.
18		
19	A.	Not only is this statement of Mr. Koutsky's untrue; his allegation that
20		BellSouth has overbilled Covad in the amount of \$1.6 million through March
21		2001 is incorrect. As discussed in my rebuttal to issue 31 above, a significan
22		portion of the disputed dollars has been determined by BellSouth to be
23		legitimate charges.
24		
25		

1	Q.	ON PAGES 23 AND 25 OF HIS TESTIMONY, MR. KOUTSKY CLAIMS
2		THAT BELLSOUT'S PROPOSAL CREATES AN INCENTIVE FOR
3		BELLSOUTH TO RENDER INCORRECT BILLS. PLEASE COMMENT.
4		
5	A.	Mr. Koutsky's claim is absolutely false and amounts to nothing more than
6		unsubstantiated and inflammatory rhetoric. BellSouth's proposal would in no
7		way require Covad to pay any amount associated with disputed charges until
8		the dispute has been resolved. In fact, there are several reasons why BellSouth
9		has a much greater incentive to provide timely, accurate and complete bills to
10		its customers. These reasons include fewer billing disputes, fewer adjustments
11		increased customer satisfaction, and better measurement results.
12		
13	Q.	COVAD CLAIMS ON PAGES 25 AND 26 OF MR. KOUTSKY'S DIRECT
14		TESTIMONY THAT ALECS DO NOT HAVE ACCESS TO BELLSOUTH
15		NETWORK INFORMATION REQUIRED FROM BELLSOUTH TO
16		VERIFY MILEAGE CHARGES ON THEIR BILLS. PLEASE COMMENT.
17		
18	A.	Mr. Koutsky provides few details on this point. However, the lone example he
19		sites involving high-cap DS3 circuits is basically false. In general, a customer
20		should be able to calculate mileage charges associated with a circuit that
21		appears on their bill by using the vertical and horizontal coordinates ("V&H
22		coordinates") for the A and the Z Common Language Location Identification
23		(CLLI) code locations of the circuit. V&H coordinates may be obtained from
24		the NECA 4 Tariff. The NECA 4 tariff is not a BellSouth document.
25		

1 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

3 A. Yes.

Exhibit CLG-R1

Sample Federal Express Delivery Confirmation Forms for Covad Magnetic Tape Bills Consisting of 10 Pages



U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774895660**. Our records reflect the following information.

Delivery Information:

Signed For By: K.CEHAND

Fed; /red; x Fed; x Fed

Delivery Location: 2330 CENTRAL EXPRESSIVAY

Delivery Date: January 4, 2001

Delivery Time: 0934

Shipping Information:

Tracking No: 466774895660

Ship Date: January 3, 2001

Recipient:

Shipper:

BELLSOUTH TELECOMMUNICATIONS
BELLSOUTH TELECOMMUNICATIONS

1876 DATA DR STE 20

SANTA CLARA, CA 950500000

US

BIRMINGHAM, AL 352441201

US

Shipment Reference Information:

COVAD COMM, ACCOUNTS PAY

Thank you for choosing FedEx Express. We look forward to working with you in the future.

FedEx Worldwide Customer Service 1-800-Go-FedEx®



U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774902562**. Our records reflect the following information.

Delivery Information:

Signed For By: K.CEHAND



Delivery Location: 2330 CENTRAL EXPRESSWAY

Delivery Date: January 31, 2001

Delivery Time: 1003

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- 1	68	11			ш				ш				~				_

Tracking No: 466774902562 **Ship Date:** January 30, 2001

Recipient: Shipper:

BELLSOUTH TELECOMMUNICATIONS
BELLSOUTH TELECOMMUNICATIONS

1876 DATA DR STE 20

US

SANTA CLARA, CA 950500000 BIRMINGHAM, AL 352441201

Shipment Reference Information: COVAD COMM, ACCOUNTS PAY

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1-800-Go-FedEx®

US



U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **435855554052**. Our records reflect the following information.

Delivery Information:

Signed For By: K.CEHAND



Delivery Location: 2330 CENTRAL ESPRESSWAY

Delivery Date: February 14, 2001

Delivery Time: 1115

Shipping Information:

Tracking No: 435855554052 Ship Date: February 13, 2001

Recipient:

Shipper:

BELLSOUTH TELECOMMUNICATIONS
BELLSOUTH TELECOMMUNICATIONS

1876 DATA DR STE 20

BIRMINGHAM, AL 352441201

US

CA 950500000 US

Shipment Reference Information:

COVAD COMMUNICATIONS

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U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774910126**. Our records reflect the following information.

Delivery Information:

Signed For By: M.DORENCAMP



Delivery Location: 4250 BURTON DR **Delivery Date:** February 28, 2001

Delivery Time: 0921

Shipping Information:

US

Tracking No: 466774910126 **Ship Date:** February 27, 2001

Recipient: Shipper:

BELLSOUTH TELECOMMUNICATIONS
BELLSOUTH TELECOMMUNICATIONS

1876 DATA DR STE 20

US

SANTA CLARA, CA 950540000 BIRMINGHAM, AL 352441201

Shipment Reference Information: BLUESTAR

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U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774914864**. Our records reflect the following information.

Delivery Information:

Signed For By: M.DORENCAMP



Belivery Location: 4250 BURTON DR **Belivery Date:** March 20, 2001

Delivery Time: 0904

Shipping Information:

Tracking No: 466774914864 **Ship Date:** March 19, 2001

Recipient:

BILL VERIFICATION GROUP COVAD COMMUNICATIONS 4250 BURTON DR. SANTA CLARA, CA 950540000 US

Shipment Reference Information:

Shipper:

BELLSOUTH TELECOMMUNICATIONS BELLSOUTH TELECOMMUNICATIONS 1876 DATA DR STE 20 BIRMINGHAM, AL 352441201 US

BLUESTAR COMM., COVAD, BIL

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U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774915654**. Our records reflect the following information.

Delivery Information:

Signed For By: M.DORENCAMP



Delivery Location: 4250 BURTON DR **Delivery Date:** March 28, 2001

Delivery Time: 0905

Shipping Information:

Tracking No: 466774915654

Recipient:

BILL VERIFICATION GROUP COVAD COMMUNICATIONS 4250 BURTON DR. SANTA CLARA, CA 950540000 US Shipper:

BELLSOUTH TELECOMMUNICATIONS BELLSOUTH TELECOMMUNICATIONS 1876 DATA DR STE 20 BIRMINGHAM, AL 352441201 US

Ship Date: March 27, 2001

Shipment Reference Information:

BLUESTAR COMMUNICATIONS

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U.S. Mail: PO Box 727 Memphis, TN 38194-4643

Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **435855560893**. Our records reflect the following information.

Delivery Information:

Signed For By: A.BRUGIONI



Delivery Location: 2330 CENTRAL EXPY

Delivery Date: April 3, 2001

Delivery Time: 1011

Shipping Information:

Tracking No: 435855560893 Ship Date: April 2, 2001

Recipient:

ACCOUNTS PAYABLE
COVAD COMMUNICATIONS
2330 CENTRAL EXPRESSWAY
SANTA CLARA, CA 950500000
US

Shipper:

BELLSOUTH TELECOMMUNICATIONS BELLSOUTH TELECOMMUNICATIONS 1876 DATA DR STE 20 BIRMINGHAM, AL 352441201 US

Shipment Reference Information:

COVAD COMMUNICATIONS

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Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774916731**. Our records reflect the following information.

Delivery Information:

Signed For By: M.DORENCAMP



Delivery Location: 4250 BURTON DR **Delivery Date:** April 12, 2001

Delivery Time: 0858

Shipping Information:

Tracking No: 466774916731 Ship Date: April 11, 2001

Recipient:

COVAD COMMUNICATIONS
BLUESTAR COMMUNICATIONS
BILL VERIFICATIONS GROUP
SANTA CLARA, CA 950540000
US

Shipper:

BELLSOUTH TELECOMMUNICATIONS BELLSOUTH TELECOMMUNICATIONS 1876 DATA DR STE 20 BIRMINGHAM, AL 352441201 US

Shipment Reference Information:

BLUESTAR

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Telephone: 901-369-3600

5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **466774921215**. Our records reflect the following information.

Delivery Information:

Signed For By: K.CEHAND



Delivery Location: 2230 CENTRAL EXPY

Delivery Date: May 7, 2001 **Delivery Time:** 1006

Shipping Information:

Tracking No: 466774921215 Ship Date: May 4, 2001

Recipient:

ACCOUNTS PAYABLE
COVAD COMMUNICATIONS
23300 CENTRAL EXPRESSWAY
SANTA CLARA, CA 950500000
US

Shipper:

BELLSOUTH TELECOMMUNICATIONS
BELLSOUTH TELECOMMUNICATIONS
1876 DATA DR STE 20
BIRMINGHAM, AL 352441201
US

Shipment Reference Information:

COVAD

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Telephone: 901-369-3600

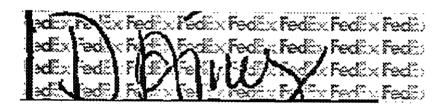
5/21/2001

Dear Customer:

Here is the proof of delivery for the shipment with tracking number **435855566799**. Our records reflect the following information.

Delivery Information:

Signed For By: D.ARNEY



Delivery Location: 4250 BURTON DR **Delivery Date:** May 14, 2001 **Delivery Time:** 1029

Shipping Information:

Tracking No: 435855566799

Recipient:

BILL VERIFICATION GROUP BLUESTAR COMMUNICATIONS 4250 BURTON DRIVE SANTA CLARA, CA 950540000 US

Shipment Reference Information:

Ship Date: May 11, 2001

Shipper:

BELLSOUTH TELECOMMUNICATIONS BELLSOUTH TELECOMMUNICATIONS 1876 DATA DR STE 20 BIRMINGHAM, AL 352441201 US

BLUESTAR

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Exhibit CLG-R2

Pages 1 and 481 of May 10, 2001 Bill from An ALEC to BellSouth.

Consisting of 2 Pages



BILL

BILL NO INVOICE NO BILL DATE 407 MAY 10, 2001 PAGE 1

TO: BELL SOUTH TELECO, INC 7D2 600 NORTH 19TH STREET

BIRMINGHAM AL

35202

NOTICE: NOT FOR DISCLOSURE WITHOUT PERMISSION OF ADDRESSOR.

BILLING INQUIRIES CALL (770) 750-0288 PAYMENT INQUIRIES CALL (770) 750-0288

SWITCHED ACCESS SERVICE FEATURE GROUP D

TOTAL - FLORIDA

* * * BALANCE DUE INFORMATION * * *

TOTAL AMOUNT OF LAST BILL

ADJUSTMENTS APPLIÉD - SEE DETAIL INTRASTATE

* * * DETAIL OF CURRENT CHARGES * * *

LATE PAYMENT CHARGES - SEE DETAIL

DITHER CHARGES AND CREDITS - SEE DETAIL INTRASTATE

USAGE CHARGES - SEE DETAIL INTRASTATE LOCAL

TOTAL AMOUNT DUE

ı



MAY 10, 2001 PAGE 481

* * * SUMMARY OF USAGE STATISTICS * * *

TOTAL - FLORIDA

LOCAL

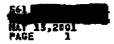
TERMINATING	RECORDED HOW?	MESSAGES	T/O FACTORED MOU
DIRECT			
MTS	التقاملينيية ا	فالواسان	
TANDEM			
MTS			
CELLULAR II			
TOTAL			

Exhibit CLG-R3

Pages 1 and 352 Of May 13, 2001 Bill From BellSouth to An Interexchange Carrier Customer.

Consisting of 2 Pages

BILL NO INVOICE NO BILL DATE ACNA





BILLING INQUIRIES CALL (800) 721-8127

WEB ADDRESS: WHW. Interconnection. bellsouth.com

SAN 10424-Al16

BELLSOUTH FACILITY ACCESS SERVICE

* * BALANCE DUE INFORMATION * * *

TOTAL AMOUNT OF LAST BILL

PAYMENTS APPLIED - "SEE DETAIL

ZERO BALANCE DUE - SEE DETAIL

* * * DETAIL OF CURRENT CHARGES * * * *

HONTKLY ACCESS CHARGES

FROM MAY 13 THRU JUN 12

INTERSTATE

LOCAL

OTHER CHARGES AND CREDITS - SEE DETAIL

INTERSTATE

INTERSTATE

AON JURISDICTIONAL

LOCAL

TOTAL CURRENT CHARGES * DUE BY JUN 13 *

TOTAL AMOUNT DUE

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PAGE REFERENCE NO

PAGE REFERENCE NO

PAGE REFERENCE NO

1 BILL FACE PAGE 4 DC-AND-C PAGE 130 CKT PAGE

· ...