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February 4, 2002

Ms. Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960786B-TL

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom Communications, Inc. are the original and fifteen copies of WorldCom's Pre-Workshop Comments on BellSouth's OSS.

By copy of this letter, this document has been provided to the parties on the attached service list.

Very truly yours,

Gary V. Perko

GVP/jlm
Enclosures
cc: Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s entry into InterLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996 (Third Party OSS Testing)	DOCKET NO. 960786B-TL
In re: Petition of Competitive Carriers for Commission action to support local Competition in BellSouth Telecommunication, Inc.'s service territory.	DOCKET NO. 981834-TP FILED: February 4, 2002

WORLDCOM'S PRE-WORKSHOP COMMENTS ON BELLSOUTH'S OSS

In his Order on Motion Requesting Workshop in OSS Testing Track, Order No. PSC-01-2287-PCO-TL (Nov. 20, 2001), the Pre-Hearing Officer ordered a workshop to be held on February 18, 2002 concerning ALECs' commercial experiences. The Pre-Hearing Officer further ordered "ALECs intending to present information regarding their experiences at this workshop [to] provide pertinent information regarding the matters to be addressed at the workshop to BellSouth by February 4, 2002, two weeks prior to Workshop II." WorldCom's MCI affiliate has been providing local residential service in Georgia since May 15, 2001 and in Florida (on a more limited basis) since November 16, 2001, and therefore now has substantial experience with BellSouth's OSS and its change management process. Pursuant to the Pre-hearing Officer's Order, WorldCom provides its Pre-Workshop Comments below.

I. INTRODUCTION

On November 20, 2001, WorldCom filed the Affidavit of Sherry Lichtenberg, which included as attachments two declarations ("Declarations") concerning BellSouth's OSS that WorldCom filed at the FCC in conjunction with BellSouth's Georgia/Louisiana 271 application. (The Affidavit and Declarations are incorporated herein by reference.) On December 20, 2001, in the face of certain rejection by the FCC, BellSouth withdrew its Georgia/Louisiana 271 application. Plainly, the FCC found persuasive the declarations filed by WorldCom and other ALECs.

In a statement issued on the day of BellSouth's withdrawal, FCC Chairman Powell noted that "[t]he FCC cannot approve such applications by the Bell Companies unless they satisfy the requirements of section 271 of the Communications Act." He further stated that

> despite extensive conversation and collaboration with the FCC, questions remain regarding whether BellSouth has satisfied the rigorous requirements of the statute and our precedents, <u>including the adequacy of the company's operational support systems,</u> the integrity of its performance data <u>and its change management process</u>, and related issues.

(Emphasis added.) Since BellSouth withdrew its Georgia/Louisiana 271 application, MCI has continued to experience significant problems with BellSouth's ordering, provisioning, and billing systems, as well as BellSouth's change management process, for the reasons outlined in the Declarations. Unfortunately, MCI has not seen significant improvement in these areas despite statements by BellSouth in the media that it intends to refile the Georgia/Louisiana petition soon. If anything, it has become even more difficult to deal with BellSouth because it has become even more reluctant to address operations support system ("OSS") issues in the wake of its 271 withdrawal. It is our hope that the upcoming workshop will provide an opportunity to discuss these issues more openly and for ALECs and BellSouth to work together to resolve them. Toward that end, WorldCom provides the following information to supplement what was already provided in its Affidavit and Declarations.

II. SUPPLEMENTAL INFORMATION

A. BellSouth's Change Management Process Is Deeply Flawed

Change control, also known as change management, involves managing the process of making changes to BellSouth's OSS. More specifically, change control concerns the submission, acceptance, prioritization, scheduling and implementation of change requests, whether the source of the request is BellSouth, an ALEC or a regulatory agency. It also deals with the documentation, notification and testing of changes prior to implementation and the correction of defects after implementation. Effective change control ensures that unannounced changes to BellSouth's systems (whether to the downstream legacy systems or the so-called ALEC interface) do not degrade ALEC access and order processing. Just as nondiscriminatory access to OSS is crucial to ALECs' ability to compete in the local market, change control is critical to developing and maintaining nondiscriminatory OSS. Without an effective CCP and Commission supervision, BellSouth is left with unfettered discretion to make as many or as few changes as it wishes, to test changes as it sees fit, and to provide change notices as it deems appropriate. Most importantly, without such oversight, the defects that BellSouth may introduce into its software due to its own poor internal testing processes will not be fixed rapidly enough to keep ALECs and their customers from being harmed.

The current CCP is deeply flawed. As just noted, Chairman Powell listed the change management process as one of the areas where questions remain as to whether BellSouth has met the FCC's requirements. A discussion of some of the key problems with the CCP, and solutions proposed by ALECs, is provided below.[1]

1. BellSouth Takes Far Too Long to Process and Implement Change Requests

ALECs submitting change requests to make system improvements face delays at every step in the process – acceptance of the request by BellSouth, prioritization, scheduling and implementation. As a result, a large backlog of change requests has developed. A high level analysis of the change control log provided to support the January 22, 2002 monthly status meeting reveals the following:

Feature Change Request Backlog (90)

- 21 in New Status (dating back to March 2000)
- 18 in Pending Status (dating back to October 2000)
- 36 in Candidate Request Status (dating back to September 1999)
- 15 in Scheduled Status (dating back to September 1999)

Defect Change Request Backlog (61)

- 24 in New/Validated Status (dating back to September 2000)
- 37 in Scheduled Status (dating back to January 2001)
    - 22 Implementations scheduled 2/2/02
    - 13 Documentation Defects -- corrections on 1/18 or 1/31/02

[1] ALECs recently provided an assessment similar to the one set out in the text to the Georgia Public Service Commission in comments concerning needed improvements. In conjunction with that filing, ALECs provided BellSouth with a proposed red-line of the CCP document. That red-line is incorporated herein by reference.

- o 2 Implementations scheduled 4/7/02

The published 2002 release schedule implements only twenty-four feature changes in 2002. Assuming that BellSouth constructs and resources future release schedules in the same manner going forward, the existing backlog of feature requests will not be cleared until the year 2005 if no other feature change requests arise. Nothing about the present CCP, nor any BellSouth proposal concerning the available capacity of future releases, provides any assurance that this situation will change.

The outlook for defect change requests is not much better. None of the twenty-four defect change requests in new/validated status has scheduled implementation dates. The existing defect targets do not provide for timely correction of defects and often have not been met as is evidenced by the facts that (1) defects currently scheduled for implementation date as far back as January 2001 and (2) unscheduled defects date as far back as September 2000. It is impossible to determine when the defect request backlog might be cleared.

Data filed by BellSouth confirms that ALECs face inordinate delays in having change requests processed and implemented. In its reply comments and ex parte filings made with the FCC after the submission of its Georgia/Louisiana 271 application, BellSouth provided information demonstrating the failure of the existing process to provide for the timely implementation of change requests and the disparate treatment ALEC initiated requests receive.[2] The information in this filing revealed that over a three year period BellSouth implemented 32 ALEC initiated changes out of 153 submissions; over the last two years of that same three year period BellSouth

[2] FCC Reply Comments of William N. Stacy, 11/13/01 and BellSouth FCC ex parte dated 11/13/01.

implemented 33 BellSouth initiated changes out of 95 submissions; the average implementation interval for the BellSouth initiated changes was 60 days; the average implementation interval for the ALEC initiated changes was 164 days; and the implementation intervals were measured using the same start and stop points in the CCP process.

To address the problem of delays in the processing and implementation of change requests, ALECs have proposed the following improvements to the CCP:

- Implementation targets for all types of changes should be included. This will ensure that the proper level of resources is committed to support the implementation of changes.
- ALECs should be given the opportunity to meet directly with the BellSouth managers who make the final decisions on implementation and prioritization of change requests, along with their subject matter experts, including the BellSouth vendor personnel that are actually responsible for release development and testing. This will ensure that ALECs can discuss change requests directly with the BellSouth personnel who actually make the final decisions on change requests and their subject matter experts, rather than merely with "go-betweens."
- BellSouth should be required to provide ALECs with a written explanation whenever it rejects a proposed change request. This will assist the ALECs in determining whether a valid basis exists for the rejection.
- In all cases, BellSouth's explanation should not simply be "against policy" but should explain exactly why the change was rejected. In addition, BellSouth

cannot be allowed to continue to use the "request for additional information" process to delay and thwart ALEC requests.

- The materials (known as the "change review package") that BellSouth is required to distribute before a change review meeting should include not only a schedule of releases, but a description of the capacity of each release. This will ensure that the ALECs will learn in advance of any capacity limitations of the release.

2. <u>BellSouth Implements Far Too Few ALEC Change Requests</u>

As just noted, over a three year period, BellSouth implemented just thirty-two change requests submitted by ALECs. And in 2001, BellSouth implemented only five prioritized change requests (four of them from ALECs). In contrast, from October 2000 to October 2001 Verizon implemented 170 prioritized changes. This problem appears to be attributable at least in part to BellSouth's failure to allocate sufficient resources to making OSS improvements. Commission oversight will be required to address that issue. In addition, ALECs are proposing the following solutions to address this serious problem:

- No arbitrary limitation should be placed on the number of BellSouth releases each year. This will ensure that changes are not unduly delayed by a limited number of releases and that changes will be implemented more according to demand and ALEC need.
- Each quarter, BellSouth should provide a release capacity forecast covering the remainder of the current calendar year and the following calendar year including descriptions of the items to be included in each future release.

3. The Prioritization Process Must Be Improved

The real process of evaluating and implementing changes has been hidden from ALECs by BellSouth. Following the ALECs' prioritization of change requests BellSouth has been convening its own prioritization process including only BellSouth personnel and considering changes submitted by BellSouth personnel from internal groups that have not been made available to the ALECs. This process is described in KPMG Exception 88 in the Florida third-party test. The "integrated master list" that results from this hidden process also is not shared with the ALECs. Following this process, which always reduces the number and priority of ALEC initiated requests included in the "integrated master list," BellSouth then only recommends implementation of the top thirty items to its information technology group and vendors. To address this problem, ALECs have proposed the following changes:

- A new position should be created within the CCP, the Designated ALEC Co-moderator. That person would function as a co-moderator in presenting and monitoring the progress of pending change requests to and within the BellSouth internal process.
- All change requests, whether BellSouth or ALEC generated, should be prioritized by the CCP before they can be submitted to the BellSouth IT teams and contractors for development.
- In sizing and sequencing change requests prioritized by the ALECs, BellSouth should begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release. BellSouth's current artificial constraints on the number of changes to be reviewed in the

prioritization meeting make it difficult for ALEC requests to be processed in a timely manner, if at all. This change will ensure that ALECs have a meaningful voice in prioritization and that the priorities assigned by the ALECs will be implemented.

4. <u>The Scope of the CCP Should Be Broadened and Clarified</u>

BellSouth inappropriately limits the scope of the CCP. One notable example is billing, which BellSouth contends should not be addressed through change control. Another important example is that the CCP's definition of ALEC affecting is too narrow, which means BellSouth does not provide notices to ALECs concerning changes that in fact affect how they must place orders or how their orders will be treated in the BellSouth legacy systems. To address these problems, ALECs have proposed the following changes:

- The scope of the CCP should be clarified to include: (1) the development of new interfaces; and (2) changes to BellSouth linkage systems such as LEO and LESOG, and BellSouth's legacy systems such as SOCS and LMOS. This will ensure that the CCP encompasses all changes to the OSS that directly affect ALECs.
- The existing definition of ALEC affecting change should be clarified to reflect that it is broad in scope rather than narrow and restrictive. The new definition must include an acknowledgement that the BellSouth linkage and legacy systems discussed above are also ALEC impacting and ALECs should be provided notice and a testing opportunity when these systems are changed.

- The CCP should be amended to make clear that it includes changes to BellSouth's billing systems. As previously stated, notwithstanding the language of the CCP document, BellSouth currently (and erroneously) maintains that billing is outside the scope of the CCP.

5. The Testing Process Must Be Improved

Deficiencies in the CCP, and BellSouth's failures to perform as required by the process have contributed to faulty software implementations including, for example, the multiple defects in the recent software releases for Migration by telephone number and Street Address Number and for parsed CSR data. To remedy this continuing problem, ALECs have proposed the following:

- A "go/no go vote" process should be implemented. This will ensure that a scheduled change will go forward only with the ALECs' consent and that ALECs can stop a planned change that may cause problems in the OSS, based on testing or on a review of documentation when testing is unavailable.
- The CAVE testing process should be upgraded to meet the ALECs' needs as stated in the original change request and subsequently determined to be required by use of CAVE as implemented.

6. BellSouth's Proposed "40% Solution" Should Be Rejected

BellSouth in its reply comments and ex parte filing to the FCC has made a proposal that is simply a commitment to the status quo. BellSouth offers to provide to

ALEC initiated change requests and something it calls "CLEC initiated mandates" 40% of its future release capacity on an annual basis. BellSouth's offer contains no target intervals for the implementation of feature changes or any other changes to make the process more open to ALECs and regulators. It offers no evidence that 40% is adequate and in fact does not even clearly define the whole from which the 40% would be taken. BellSouth states that it obtained its 40% number through the analysis of past releases. But replicating the poor performance BellSouth has delivered in the past will not solve ALECs' problems. BellSouth's proposal should be rejected.

B. BellSouth's Provisioning Accuracy Is Low

In a recent audit of 500 customer lines, MCI discovered that at least 2.5% of the lines had not been provisioned correctly. Such problems can result from failure to correctly translate and pass information from MCI's LSR EDI record into the computer code (language) that BellSouth's backend systems use, from information that is dropped between LEO and LESOG, from the LESOG order generation process itself, or from mistakes made during manual processing. The BellSouth Local Carrier Service Center ("LCSC") has begun checking for manual accuracy, but does so for only for ten orders per representative per month and only based on a comparison of the order submitted by the representative and the LSR after it has been translated by BellSouth's systems. BellSouth needs to audit the translator program it uses to translate EDI records to TCIF code, determine why so many orders fall out of LESOG for manual processing, and check more thoroughly the accuracy of the work done by representatives in its LCSC. Equally importantly, BellSouth must develop a process for ensuring that the repeat manual processing errors plaguing ALECs such as MCI are communicated to the local processing centers in a timely fashion and that training and job aids are established to ensure that such problems are corrected immediately. BellSouth has allowed MCI's problems with incorrect rejects to languish for well more than six months despite repeated promises of re-training.

One provisioning problem that was found during the audit was provisioning the wrong PIC. Attachment 1 shows examples of telephone numbers for customers who requested MCI as their intraLATA toll PIC, but whose intraLATA calls are not being routed to MCI's long distance switches. In each case, MCI is receiving call records for the customer's intraLATA toll calls via the daily usage file, and BellSouth's CSOTS system shows MCI as the customer's intraLATA PIC.

Another problem has been loss of dial tone resulting from problems in translating the features and functions requested by MCI customers in the BellSouth switch. MCI does not have visibility into the BellSouth switch translation system (MARCH) but has been told by the Customer Wholesale Interconnection Services center and in External Review Team ("ERT") responses to our questions that "translation" problems have blocked the customer's ability to make phone calls or receive calls and have caused loss of dialtone. The Florida third-party test has validated that what an ALEC requests is often not translated into the BellSouth switch. Examples provided in Attachment 1 show telephone numbers for which, according BellSouth technicians' comments on repair tickets, the customer lost dial tone due to translation issues.

Incorrect or missing features (such as 900/976 blocking or third party call blocking) have been another source of provisioning problems. While BellSouth has stated in its ex partes at the FCC that 900/976 errors are "not customer impacting," MCI disagrees strongly. The ability for consumers to block 900/976 calls is critical to ensure that children do not have access to "adult oriented" content and that consumers do not inadvertently run up charges for calls they asked their carrier to block. Most importantly, BellSouth must provision what an ALEC requests in order to provide the parity of service called for under the Telecommunications Act of 1996. Examples of telephone numbers for which features were provisioned incorrectly are included in Attachment 1.

Incorrect billing, incorrect account name and other errors on post-migration customer service records ("CSRs") also have been a problem area. MCI has been asking its BellSouth account team how CSRs are updated – manually or electronically -- for several months, but MCI still has not received an answer. Errors in the CSR would appear to reflect errors in the switch, but might not if BellSouth creates CSRs manually for all migrations. MCI continues to be at a loss to explain why BellSouth refuses to answer what would appear to be simple questions from ALECs.

In addition, MCI is receiving daily usage feed records for customers for whom MCI has received line loss reports, again suggesting that the switch has been translated incorrectly. Examples of such customers are found in Attachment 1. MCI continued to receive daily usage file records showing traffic for these customers reflecting sometimes hundreds of calls for up to two months after the line loss report was received.

C. Manual Handling Continues to Generate Invalid and Incorrect Rejects

BellSouth has been rejecting valid LSRs when BellSouth's RSAG and CRIS databases used in provisioning the order do not match. BellSouth has stated the problem would be fixed on February 2, although it has not permitted ALECs to test the system fix in advance or to see the business rules that will be used to govern this edit in order to ensure that it works and does not lead to other problems. Another source of invalid rejects are LSRs for customers who had voice mail or call forwarding with BellSouth. Such LSRs apparently are designed to fall out for manual processing (although are not designated as such in the BellSouth documentation) and then often are rejected in error or provisioned incorrectly. MCI's BellSouth account team has stated that BellSouth is considering making these orders flow through electronically, but MCI is not aware, through the change management process or otherwise, whether BellSouth has firm plans to do so. One problem with addressing problems with manual processing is that orders fall out for manual processing in the Atlanta LCSC, but when ALEC representatives call about UNE-P orders, those calls are handled by the Jacksonville LCSC. Thus, during the recent visit to the Atlanta LCSC, BellSouth representatives there stated they were unaware of the manual handling problems, which suggests there has been a communication breakdown between the two LCSCs.

D. BellSouth Has Not Fully Implemented Parsed CSRs

In November 2000, ALECs and BellSouth discussed implementation of the parsed CSR project. ALECs presented draft user requirements and the parties reached agreement on what would be included. Nearly a year later, in September 2001, BellSouth provided ALECs with documentation reflecting a parsed CSR product that was different than what ALECs had requested, even though BellSouth did not tell ALECs about any differences in the intervening months. Despite objections from ALECs, BellSouth proceeded to implement its revised version of CSR parsing rather than what ALECs requested and agreed to.

BellSouth's CSR parsing release failed to include nineteen fields in parsed format that were requested by ALECs in November 2000. BellSouth has stated that some of these fields are not part of the CSR and some cannot be parsed. But all of these fields are used on either the inquiry or response pre-order CSR transactions. For example, the company code and inquiry number are codes that ALECs transmit on the CSR inquiry. BellSouth must send those codes back on the response transaction to establish the proper handshake between the companies; yet BellSouth's documentation does not say BellSouth will return this information. Moreover, other ILECs have been able to parse these fields and there is no reason to believe BellSouth cannot do so. And these fields are important. For example, BellSouth's implementation of parsed CSRs does not include end user name, unit number or hunting information.

E. BellSouth Still Must Implement the Single C Order process

Two percent of MCI customers continue to lose dial tone in the first thirty days after migration, and to date more than 5000 MCI customers have lost dial tone after migration. At least part of this problem is caused by BellSouth's two-order provisioning process. BellSouth has announced that it will implement a single C order process, which should reduce the problem with loss of dial tone substantially, but BellSouth has stated it will not implement this change until April. MCI is currently discussing the issue of testing this process with BellSouth and has requested documentation and other information prior to the change.

F. BellSouth Has No Immediate Plans to Implement Interactive Agent

Use of a Value Added Network ("VAN") delays transmission of orders, as well as FOCs, rejects, and completion notices between MCI and BellSouth – delays that are not captured in BellSouth's performance measures. Yet BellSouth, alone among the Bell companies, has refused to adopt Interactive Agent, the industry standard mode of transmission. WorldCom submitted a change management request for the Interactive Agent on September 26, 2000, but Interactive Agent has not been implemented and is not one of the upgrades BellSouth has scheduled for implementation during 2002.

G. MCI Has Had Difficulty Receiving Complete Line Loss Reports

After MCI began its Georgia launch, it raised with BellSouth the issue of BellSouth's failure to provide complete line loss reports. Obtaining complete reports is critical because without a line loss report MCI does not know to stop billing a customer who has migrated to another company (in most cases, BellSouth). Because of this problem, thousands of former MCI customers have been double billed through no fault of MCI. MCI has received more than 1285 complaints of continued local billing since it launched service. After months of stonewalling, BellSouth finally provided missing line loss reports from October 1 through December 1, which included 2744 customers who had left MCI in those two months. Since then, BellSouth has provided an interim process in which it has provided additional line loss reports on an interim basis. The permanent fix for this problem was scheduled for implementation on February 2 (to keep certain line loss reports from being excluded from the daily line loss file sent to MCI) and a later release is supposed to deal with the manual handling errors that continue to occur. MCI has requested a reflow of all missing line loss reports back to its Georgia launch in May, but BellSouth has been unable to send this information. MCI also has requested information from BellSouth on the meaning of the various web pages and items on those web pages concerning line loss reporting, but BellSouth has yet to answer what MCI thinks is a very simple question.

H. MCI Has Encountered Several Billing problems

Not surprisingly, wholesale billing problems (known as telco billing) are among the last to be detected because of the lag between provisioning and billing. A number of billing problems have surfaced since MCI's launch began. MCI has found, for example, that six and a half percent of the lines for which MCI is billed do not include a billing telephone number, which prevents MCI from determining whether bills on these lines were proper. Another problem with BellSouth's wholesale bills is that BellSouth is not using the correct billing number to bill WorldCom for UNE-P usage. MCI requested that BellSouth fix this problem after MCI received its very first bill, but BellSouth still has not done so. MCI also has discovered that BellSouth has improperly routed tens of thousands of intraLATA calls through its own switches, rather than through the switches of the intraLATA carriers chosen by MCI's customers (generally MCI's long distance operation). This misrouting denies the customer service from the carrier of its choice and leads to a loss of revenue for the chosen intraLATA carrier. BellSouth itself identified "translation errors" as the cause of the problem. Finally, ALEC orders sometimes drop into various pending billing states requiring manual work to correct errors and complete the final step of the order before BellSouth's billing systems are updated – which leads to the potential for double billing. MCI has provided BellSouth numerous examples of orders for which MCI has received completion notices but for which BellSouth has not updated the CSR. MCI believes that in many instances, the cause of this problem is that orders have dropped into a billing discrepancy file, but since no one at BellSouth has answered MCI's questions about the systems and processes used in updating CSRs, it cannot determine whether this is the root cause of the problem. The resolution of these billing problems is critical to MCI's business and to the experience of MCI's customers.

I. <u>BellSouth Responds Too Slowly to MCI's Questions and Concerns</u>

BellSouth recently has stated that it refers an ALEC question to the ERT process when the question involves what BellSouth believes is an issue of policy, an arbitration issue or a question of parity with other ALECs. In MCI's experience, the response time for the ERT process is nearly two months on average and includes any question for which an ALEC has requested a written answer, even the simple question of the meaning of the entries on the BellSouth web site described above. MCI is currently waiting for ERTs for questions about translation problems and manual handling. This process is not used by any other ILEC, is totally inefficient, and wastes resources on both sides of the process.

RESPECTFULLY SUBMITTED, this 4th day of February, 2002.

Donna Canzano McNulty

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail, or hand delivery (*) to the following parties this 4th day of February, 2002.

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ATTACHMENT 1

EXAMPLES OF MCI CUSTOMERS WHO REQUESTED MCI AS THEIR INTRALATA TOLL PIC, BUT WHOSE INTRALATA CALLS ARE NOT BEING ROUTED TO MCI'S LONG DISTANCE SWITCHES

[redacted]

EXAMPLES OF CUSTOMERS WHO LOST DIAL TONE RESULTING FROM PROBLEMS IN TRANSLATING FEATURES AND FUNCTIONS

[redacted] [redacted]

[redacted]

EXAMPLES OF CUSTOMERS WHOSE
WHICH FEATURES WERE PROVISIONED INCORRECTLY

[redacted]

[redacted]

[redacted]

[redacted]

EXAMPLES OF CUSTOMERS FOR WHOM MCI CONTINUED TO RECEIVE
USAGE FEED RECORDS AFTER MIGRATION

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]