

REDACTED

2005 Competitive Local Exchange Carrier (CLEC) Data Request

(Due by July 15, 2005)

undocketed

Legal Company Name: DIECA Communications, Inc.

D/B/A: Covad Communications Company

FPSC Company Code (e.g., TX000) TX237

Contact name & title: Jayna Bell, Senior Paralegal

Telephone number: 404.942.3491 (as of August 1, 2005, new no. will be 678.528.6815)

E-mail address: jbell@covad.com

Stock Symbol (if company is publicly traded): COVD.OB

Services Provided in Florida

1. Do you provide local telephone service in Florida? Circle your response: Yes No
2. Please indicate which of the following services your company provides. Select all that apply.

<input type="checkbox"/> Local telephone service	<input type="checkbox"/> Paging service
<input type="checkbox"/> Private line/special access	<input type="checkbox"/> Prepaid service
<input type="checkbox"/> Wholesale loops	<input checked="" type="checkbox"/> VoIP
<input type="checkbox"/> Wholesale transport	<input type="checkbox"/> Cable television
<input type="checkbox"/> Interexchange service	<input type="checkbox"/> Satellite television
<input type="checkbox"/> Cellular/wireless service	<input checked="" type="checkbox"/> Broadband Internet access
3. If your company provides **prepaid** local telephone service, is this the only service you currently provide in Florida? Circle your response: Yes No NA (not applicable)

Bundled Services

4. Please complete the following table. For each residential and business package of bundled services you sell, list its name (e.g., Sprint Solutions), mark the included services, and enter the price and take rate. The take rate is calculated by dividing the number of customers that have subscribed to the corresponding package by the number of customers that can obtain that package from your company. Examples have been shaded.

Covad is the leading national broadband service provider of high-speed Internet and network access utilizing Digital Subscriber Line ("DSL") technology. We offer DSL, T1, managed security, Web and e-mail hosting and IP services, as well as dial-up Internet access to consumers, both directly and also through web and telephone sales, Internet Service Providers, value-added resellers, telecommunications carriers and through affinity groups to small and medium-sized businesses and home users. At this time Covad is not offering bundled local telephone service to consumers in the state of Florida.

Residential	Name of Package	Local	Long Distance	Broadband	Wireless	Video Service	Price	Take Rate
	Resphone	✓	✓			✓	\$69.99	35%
Business	Name of Package	Local	Long Distance	Broadband	Wireless	Video Service	Price	Take Rate
	Buservice	✓	✓	✓			\$89.99	25%

VoIP

5. Indicate below whether you are offering or providing VoIP service to end-user customers in Florida. For purposes of this question, VoIP service is defined as IP-based voice service provided over a digital connection. VoIP calls under this definition may or may not terminate on the PSTN.

- Not offering VoIP service in Florida.
- Offering business VoIP services.
- Offering residential VoIP services.

If you are offering or providing VoIP service in Florida:

- a. Provide the exchanges where you are offering VoIP service. *Covad is offering VoIP in the following exchanges: Deerfldbch, Boca Raton, Ftlauderdl, Jacksonvl, Jupiter, Miami, Orlando, Oviedo, Spetersbg, , Tampa, and Wpalmbeach.*
- b. Provide residential price(s) for VoIP service. *Not applicable, Covad does not currently offer VoIP services to residential consumers in the state of Florida.*

- c. Provide business price(s) for VoIP service. *Covad's VoIP products include flat-rate pricing with unlimited local and long-distance calling, ranging from \$36.95 to \$59.95 per phone station, per month. We also have per-minute pricing ranging from \$26 to \$32 per station and 3 cents to 5 cents per minute, depending on call volume. With multiple stations, interoffice calls over Covad's network are free of charge at all times (with free minutes, ISP, broadband access are included). NOTE: These prices do not reflect the cost of internet service or telephone equipment. For a complete review of pricing, the customer must request a complete voice assessment.*
- d. List all call features included with the service, e.g., call forwarding, caller ID, voice mail, etc. *Covad's VoIP products (with maybe the exception of our PBXi product) offer numerous features including, but not limited to, the following: call forwarding, caller ID, voice mail, and instant and scheduled conference calls. NOTE: Covad's PBXi Voice Service does not provide telephony features (voice mail, call forwarding, etc.). While the telephone features provided through the customer's existing PBX or KTS equipment are supported, those features provided through the local phone company are not supported as voice connectivity is made through Covad and not the phone company.*
- e. Check all that apply to your VoIP service:
- Offer wireless VoIP service.
 - Offer wireline VoIP service.
 - 911 (Location information not provided automatically to PSAP).
 - E911 (Location information provided automatically to PSAP).
 - CALEA (Communications Assistance for Law Enforcement Act).
 - Telephone Relay Service.
 - Power Backup (If so, identify time duration below, e.g., 4 hours, 8 hours).
 - Time duration of power backup (in hours).
 - Directory Assistance.
 - Operator Services.
 - Equal Access to long distance providers.
 - Local Number Portability.
 - Local Calling.
 - Long Distance Calling.
 - International Calling.
 - Contribute to Universal Service Fund.
 - Require VoIP subscriber to also purchase Broadband service.
 - Offered as primary line service.
 - Offered as secondary line service only.
 - Interconnected with PSTN.
 - Peer-to-Peer only (no interconnection with PSTN).
 - Use of public Internet.
 - Use of private IP network.
 - Call uptime 99.999%.
 - Use of numbers from the North American Numbering Plan Administrator.
- f. If you are not offering or providing VoIP service to end-user customers in Florida, do you anticipate doing so? If yes, identify rollout month/year.

Broadband Internet Access

6. Information provided in your response to this question will be reported on an aggregate, statewide basis, not on a company-specific basis.
- a. Please provide the percentage of residential households to which your broadband service is available in your service area. *Covad's broadband service is available to approximately XXXX% of households in the state of Florida.*
 - b. Provide the total number of **residential** lines and wireless channels over which you or an affiliate are providing broadband service in your service area. *Covad is providing broadband service to approximately XXXXX residential customers in the state of Florida.*
 - c. Provide the total number of **business** lines and wireless channels over which you or an affiliate are providing broadband service in your service area. *Covad is providing broadband service to approximately XXXX business customers in the state of Florida.*
 - d. What type(s) of broadband connection(s) do you provide?
 - xDSL
 - cable modem
 - satellite
 - fixed wireless
 - mobile wireless
 - Broadband over power line
 - Other (Specify)
 - e. Please fill out the following table providing the downstream and upstream data transfer rates and the monthly price for each tier of broadband service you offer.

Data Transfer Rate – Broadband Service

Residential	Downstream	Upstream	\$Price / Month**
TeleSurfer	Up to 1.5 Mbps	Up to 128 Kbps	
TeleSoHo	Up to 1.5 Mbps	Up to 384 Kbps	\$64.95
	Up to 3.0 Mbps	Up to 768 Kbps	\$99.95
Business	Downstream	Upstream	\$Price / Month **
TeleSoHo Dedicated	Up to 1.5 Mbps	Up to 384 Kbps	\$74.95
	Up to 3.0 Mbps	Up to 768 Kbps	\$119.95
Business	Downstream	Upstream	\$Price / Month**
TeleSpeed Business	Up to 144 Kbps	Up to 144 Kbps	\$129.95
	Up to 192 Kbps	Up to 192 Kbps	\$129.95
	Up to 384 Kbps	Up to 384 Kbps	\$149.95
	Up to 768 Kbps	Up to 768 Kbps	\$199.95

	Up to 1.1 Mbps	Up to 1.1 Mbps	\$239.95
	Up to 1.5 Mbps	Up to 1.5 Mbps	\$289.95
Business	Downstream	Upstream	\$Price / Month**
TeleSpeed Enterprise	Up to 144 Kbps	Up to 144 Kbps	\$149.95
	Up to 192 Kbps	Up to 192 Kbps	\$149.95
	Up to 384 Kbps	Up to 384 Kbps	\$169.95
	Up to 768 Kbps	Up to 768 Kbps	\$199.95
	Up to 1.1 Mbps	Up to 1.1 Mbps	\$259.95
	Up to 1.5 Mbps	Up to 1.5 Mbps	\$309.95
Business	Downstream	Upstream	\$Price / Month**
T-1 TeleXtend	Up to 1.5 Mbps	Up to 1.5 Mbps	\$499.00
	Up to 768 Kbps	Up to 768 Kbps	\$459.00
	Up to 384 Kbps	Up to 384 Kbps	\$359.00

*** These are prices with a 1-year contract. A further discount is given if the customer signs a 2-year contract.*

FCC's Triennial Review Remand Order

7. The following questions relate to the FCC's Triennial Review Remand Order (TRRO), released on February 4, 2005.
- a. Has your business plan in Florida changed as a result of the TRRO? If so, how? *No, Covad's business plan has not changed as a result of the TRRO.*
 - b. If you are primarily a UNE-P provider do you expect to migrate to UNE-L, negotiate commercial agreements (to provide loop, switching, and transport), or change the focus of your business? *Covad is a facilities-based provider of broadband and VoIP services in the state of Florida and does not provide UNE-P services.*
 - c. Have you executed any commercially negotiated agreements with any carriers? If so, please identify the carriers. *Yes, Covad executed a commercial agreement effective January 1, 2005, affecting the state of Florida with Verizon Services Corp.*
 - d. Is there any other information (or comments) that you wish to provide? *BellSouth remains the lone hold-out among the RBOCs to enter into a long-term commercial agreement with Covad for the provision of line-sharing.*

Mergers

8. Several mergers have been announced in the past year, e.g., Sprint-Nextel, SBC-AT&T, and Verizon-MCI.
- a. Do you anticipate more mergers? Why or why not? *Yes. Qwest aggressively pursued MCI and will undoubtedly seek out a similar company for merger / takeover.*

- b. What effects do you believe these mergers (if approved) will have on local competition in Florida? *It depends on conditions at the federal level.*
- c. Has your local competition strategy changed as a result of the merger announcements? If so, please explain how. *Covad's local competition strategy has not changed as a result of the merger announcements.*
- d. How will these mergers (if approved) affect your local competition strategy in Florida? *Again, it depends on conditions at the federal level.*

Miscellaneous

9. In 2004, how much money did you invest in your network directly serving Florida's local service customers? *Covad invested approximately \$XXXXXXXXXX in our network directly serving Florida.*
10. Are you currently operating under Chapter 7 or Chapter 11 protection? *No, Covad is not operating under Chapter 7 or Chapter 11 bankruptcy protection.*
11. If you filed Form 477 with the FCC to include data as of December 31, 2004, please provide us with a copy. This form only applies to CLECs with a minimum of 10,000 access lines in Florida. *Covad's FCC Form 477 for the state of Florida is attached hereto as Exhibit "A".*

Comments

12. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any major obstacles or barriers encountered that you believe may be impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles.

Yes, Covad continues to experience several barriers to entry in the Verizon West and BellSouth-controlled local exchange markets including, but not limited to, the following:

- a) *Covad lacks the ability to submit orders electronically for line splitting in the BellSouth region. Out of forty-two (42) different ordering scenarios for line splitting, BellSouth has deemed it necessary to implement electronic ordering for only a handful of those scenarios despite various commission orders requiring the contrary;*
 - b) *Covad, as well as other CLECs, are impaired without remote-terminal access via a broadband UNE in the State of Florida; and*
13. Please provide any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida.

If CLECs, including Covad, are to compete fairly throughout the region, BellSouth must be required to:

1. *comply with various Commission orders and their obligations to CLECs by implementing electronic ordering for all forty-two (42) line splitting scenarios;*

2. *negotiate fairly with CLECs for economically reasonable terms and rates concerning remote-terminal access; and*
3. *continue to comply with requirements under section 271 of the Act obligating them to provide line sharing, loops, switching, dark fiber and transport at just and reasonable rates.*

FLORIDA PUBLIC SERVICE COMMISSION

2005 CLEC Data Request TABLE-1

(Data as of May 31, 2005)

Company Name: Covad Communications

Company Code*: TX237

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

CLEC TABLE-1: ACCESS LINES (VGE Basis)

DO NOT INCLUDE UNE-P, RESOLD LINES (INCLUDING THOSE SOLD UNDER COMMERCIAL AGREEMENTS), OR PRIVATE LINES IN

1	2	3	4	5
Exchange	Res or Bus	Method of Service	Commercial, Non-Commercial or N/A	Total VGE Lines
Deerfldbch	Bus	UNE-L	Non-Commercial	XXX
Jacksonvl	Bus	UNE-L	Non-Commercial	XXX
Miami	Bus	UNE-L	Non-Commercial	XXX
Miami	Bus	NIL	Non-Commercial	XXX
Orlando	Bus	UNE-L	Non-Commercial	XXX
Oviedo	Bus	NIL	Non-Commercial	XXX
Stpetersbg	Bus	NIL	Non-Commercial	XXX
Tampa	Bus	NIL	Non-Commercial	XXX

FLORIDA PUBLIC SERVICE COMMISSION

2005 CLEC Data Request TABLE-2

(Data as of May 31, 2005)

Company Name:

Company Code*:

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

CLEC TABLE-2: ACCESS LINE COUNTS (not VGEs)

DO NOT INCLUDE UNE-P, RESOLD LINES (INCLUDING THOSE SOLD UNDER COMMERCIAL AGREEMENTS), OR PRIVATE LINES IN THIS TABLE.

1	2	3	4	5
Exchange	Res or Bus	Line Type	Commercial, Non-Commercial or N/A	Total Lines
Deerfldbch	Bus	DSL	Non-Commercial	XXX
Jacksonvl	Bus	SDSL	Non-Commercial	XXX
Miami	Bus	DSL	Non-Commercial	XXX
Orlando	Bus	SDSL	Non-Commercial	XXX
Orlando	Bus	DSL	Non-Commercial	XXX

FLORIDA PUBLIC SERVICE COMMISSION

2005 CLEC Data Request TABLE-3

(Data as of May 31, 2005)

Company Name:

Company Code*:

* Your CLEC Company code is shown on the label affixed to the envelope in which this was mailed and on the cover letter.

CLEC TABLE-3: CLEC SWITCH DEPLOYMENT DATA

1	2	3	4
Exchange where Switch is Located**	Packet or Circuit	# of Switches in Exchange	If Leased, name of company providing switching service
<i>San Jose, CA</i>	Packet	XXX	Covad-owned
<i>Sunnyvale, CA</i>	Packet	XXX	Covad-owned
<i>Chicago, IL</i>	Circuit	XXX	Broadwing (formerly Focal Communications)
<i>Miami, FL</i>	Circuit	XXX	Broadwing (formerly Focal Communications)
Grand Total		XXX	

***Covad uses circuit switches from Broadwing (formerly Focal Communications) to haul data traffic to our packet switches located in San Jose and Sunnyvale, California.*

EXHIBIT "A"

to the 2005 Alternative Local Exchange Carrier (ALEC) Data Request

COVAD FCC FORM 477

The FCC definition of broadband excludes any DSL service below 200 kbps. Covad serves numerous customers in Florida with DSL service of 144 kbps and 192 kbps. Those lines are excluded from the FCC Form 477 report, but are included in the service numbers provided in the Year 2005 Local Competition Report.

*****CONTAINS CONFIDENTIAL COVAD INFORMATION*****

All filers must complete Items 1 - 11 of this Cover Page. File data as of:

December 31, 2004

- 1. Filing status
- 2. Company

- 3. Indicate the category that best describes the operations covered by this filing.

- 4. Filers must report separate data for ILEC and non-ILEC operations. Use the following drop-down box to indicate whether this worksheet contains data for ILEC or for non-ILEC operations.

- 5. Use the following drop-down box to select your company, parent or controlling entity name. Select "not shown" if it is not in the list. See instructions Section IV-B-1 for information on preparing file names.

If you selected "not shown" above, then provide the following:

Name of company, parent or controlling entity.

- 6. State.

- 7. Contact person (person who prepared the data contained below).

- 8. Contact person telephone number and e-mail address.
 phone
 e-mail

- 9. Indicate whether this is an original or revised filing.

- 10. Indicate whether you request non-disclosure of some or all of the information in this file because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.

- 11. Indicate if this is a complete file or a redacted version of a complete file.

Please review instructions before completing form.

Reminders:

- 1) Ensure files are virus free by using up-to-date virus detection software. Filers are encouraged to submit files via e-mail (address: FCC477@fcc.gov).
- 2) If you are filing original or revised data for an earlier semi-annual reporting period, do not use this particular form (which is only for data as of December 31, 2004). See reminder 4.
- 3) You may not insert or delete columns or rows, move cells, or edit text or numbers outside the cells provided for data entries. Files that cannot be opened in EXCEL97, files whose structure has been altered, and files with improper names will have to be refiled.
- 4) If you have questions about the form, contact the Wireline Competition Bureau, Industry Analysis and Technology Division at (202) 418-0940; via e-mail at 477INFO@fcc.gov; or via TTY at (202) 418-0484.
- 5) You must submit a Certification Statement signed by an officer of your company. A single statement may cover all files submitted. See Instructions sections IV & V.
- 6) If you request non-disclosure of some data, you must file a public version of the form with such information redacted. See Instructions sections IV.B and IV.C for information on preparing a redacted file.
- 7) Name your files as specified in Instructions section IV.B.1. To assist you, complete this Cover Page to generate an "example" name, below. Replace the character "#" in this example name with a sequence number as specified in the instructions. This number should be "1" unless using "1" would cause you to submit more than one file with the identical file name.

Example >>> #N/A

Covad Communications Company non-ILEC operations for Florida December 31, 2004

Complete Part I if you and all affiliates (including commonly controlled entities) provide 250 or more broadband lines or wireless channels in the state over your own facilities or over lines you provisioned as broadband. See instructions for definitions of "own facilities", "broadband", "end user", and "residential and small business".

If you provide data in Part I, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the broadband services reported herein. See instructions.

Data as of December 31, 2004

A. Lines and wireless channels of broadband service that you provided over your own facilities, or over UNE loops or other lines and wireless channels that you obtained from other service providers and equipped as broadband, categorized by technology at the end-user location.

(a) Total one-way and two-way (full) broadband lines and wireless channels	Percentages of lines and wireless channels reported in (a)					
	(b) % of (a) used by residential & small business customers	(c) % of (a) provided over your own facilities	(d) % of (a) provided (i.e. billed directly) to end users	(e) % of (a) providing customers greater than 200 kbps in both directions	(f) % of (a) providing customers greater than 2 mbps in both directions	
I - 1. Asymmetric xDSL.	XXXXXX	100%	0%	XXXXXX	XXXXXX	0%
I - 2. Other traditional wireline including symmetric xDSL.	XXXXXX	100%	0%	XXXXXX	100%	0%
I - 3. Coaxial carrier systems including hybrid fiber-coaxial systems.						
I - 4. Optical carrier (fiber to the end user).						
I - 5. Satellite.						
I - 6. Terrestrial wireless fixed.						
I - 7. Terrestrial wireless mobile.						
I - 8. All other technologies, such as distribution over electric power lines.						

Note: In Part I, report actual counts. Do not report voice-grade equivalent measures.

Covad Communications Company non-ILEC operations for Florida December 31, 2004

Complete Part II if you and all affiliates (including commonly controlled entities) provide 10,000 or more voice-grade equivalent lines or wireless voice-grade equivalent channels used for local exchange or exchange access service in the state. See instructions for definitions of "voice telephone service", "voice-grade equivalent lines", "residential and small business", "owned facilities", "COLO switching centers", and "end users".

If you provide data in Part II, you must provide in Part V a list containing the 5-digit Zip Codes of the end-user locations in which you provide the wireline or fixed wireless voice grade services reported herein. See instructions.

	(a) Total voice-grade equivalent lines and voice-grade equivalent wireless channels in service	Percentages of lines and wireless channels reported in (a)			
		(b) % of (a) used for residential & small business service	(c) % of (a) provided over your own facilities	(d) % of (a) provided over UNE loops	(e) % of (a) in ILEC COLO switching centers
Data as of December 31, 2004					
A. Voice telephone service provided to end users.					
II - 1. Total lines and channels you provided to end users.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
B. Voice telephone service provided to other communications carriers, categorized by:					
II - 2. Lines and channels that you provided under a Total Service Resale arrangement. See instructions.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
II - 3. Lines and channels you provided under other resale arrangements, such as resold Centrex.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
C. UNE loops, special access lines, and those private lines that connect to carriers, categorized by:	(a) Total lines and wireless channels				
II - 4. Lines and channels that you provided under a UNE loop arrangement, where you do not provide switching for the line.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
II - 5. Lines and channels that you provided under a UNE loop arrangement, where you also provided switching for the line.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
II - 6. Special access lines not provided as broadband and private lines that connect an end-user premises to a telecommunications common carrier and is not provided as broadband.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
D. Total wireline voice-grade equivalent lines & fixed wireless voice-grade equivalent channels in service.					
		Percentage of channels reported in (a), carried over the following types of facilities categorized by the technology used in the part of the line or wireless channel at the end-user location			
		(f) Cable coaxial	(g) Wireless	(h) All other including traditional wireline	
II - 7. Total lines and channels provided. [line II-1+line II-2 + line II-3]	<input type="text" value="0"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Covad Communications Company non-ILEC operations for Florida December 31, 2004

Complete Part III if you and all affiliates (including commonly controlled entities) serve 10,000 or more mobile voice telephony subscribers in the state over your own facilities. See instructions for definitions of "mobile voice telephony subscribers" and "own facilities".

Data as of December 31, 2004

A. Mobile voice telephony subscribers in service and served over your own facilities.

(a) Network telephone service subscribers	(b) Percentage of (a) provided (i.e. billed directly) to end users
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III - 1. Cellular, PCS & other mobile telephony.

FCC Form 477 -- Local Competition and Broadband Reporting

Part V: Zip Code Lis

OMB NO: 3060-0816

Covad Communications Company, non-ILEC operations for Florida, December 31, 2004

EXPIRATION DATE: 01/31/2007

Filers completing Part I or Part II must supply a list of 5-digit Zip Codes in which the filer has at least one customer. Do not provide customer counts by Zip Code.

Data as of December 31, 2004

V - 1: 5-digit Zip Codes in the state in which you provide service to end-user locations:

	(a) Broadband service	(b) Wireline & fixed wireless exchange telephone
1	XXXXXX	
2	XXXXXX	
3	XXXXXX	
4	XXXXXX	
5	XXXXXX	
6	XXXXXX	
7	XXXXXX	
8	XXXXXX	
9	XXXXXX	
10	XXXXXX	
11	XXXXXX	
12	XXXXXX	
13	XXXXXX	
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