QWEST CORPORATION'S RESPONSE TO AT&T'S AND WORLDCOM'S REQUEST FOR CLARIFICATION OF THE APRIL 19, 2002 PROCEDURAL ORDER

I. Introduction

AT&T's and WorldCom's Request for Clarification of the April 19, 2002 Procedural Order rests on the premise that Qwest has violated the Administrative Law Judge's April 19 Order by requesting Stopwatch Maps, not TNS Telecoms, to prepare Qwest's year 2000 customer location data for use in the HAI model. That premise is wrong: Qwest has complied fully with the Procedural Order by providing all interested parties with the customer location data on May 1, 2002 and by requesting Stopwatch Maps to process those data in time to meet the May 24 deadline in the Procedural Order. Neither of these actions prevents AT&T or any other party from using TNS to process the data. Qwest's use of Stopwatch will provide the Commission with additional, directly relevant information and will ensure that at least one HAI run is available on May 24.

The Procedural Order imposed two requirements. First, it directed Qwest to provide to all parties the year 2000 customer location data no later than May 1. Qwest complied with that requirement by producing the data on May 1 after an intensive, three-week process of gathering...
and formatting the data. During that process, Qwest's cost group worked cooperatively with a representative of AT&T and WorldCom to ensure that there was agreement on both the content and form of the data.

Second, the ALJ ordered Qwest to format the data further for use in the HAI model in time to produce model results no later than May 24. As described in the accompanying affidavit of Peter Copeland, a Director in Qwest's cost group, Qwest first went to TNS to determine whether it could perform that work using the necessary 2000 Bureau of Census data that would match the year of Qwest's customer location data. TNS responded that the 2000 Census data it required was not available, meaning that it would have to use pre-2000 data. The TNS representative also stated that TNS would not be able to complete any formatting of Qwest's data until four weeks after receiving the data. Based on these responses, it was apparent that TNS could not (1) produce customer data that would be based entirely on year 2000 information, nor (2) complete the work in time for Qwest to meet the Commission's May 24 deadline.

Only when it became apparent that TNS would not be able to perform the necessary work did Qwest contact Stopwatch Maps, a highly qualified vendor with extensive experience preparing data for use in the HAI model. Nothing that occurred in the Open Meeting of April 11 or that is set forth in the Procedural Order prohibited Qwest from turning to Stopwatch after its unsatisfactory discussion with TNS. In fact, when Qwest announced in the Procedural Conference on April 16 that it intended to use a different vendor, neither AT&T nor WorldCom suggested that was improper or voiced any concern at all. AT&T and WorldCom only now assert that they made it clear at the Open Meeting that only TNS could prepare the customer location data and that the Commission somehow sanctioned that approach. A review of the transcript demonstrates, however, that AT&T and WorldCom never asserted -- and the Commission never said -- that only TNS could perform the work. Consistent with that, the Procedural Order does not require Qwest to use TNS; it provides only that "Qwest shall have the data formatted and run through the HAI model . . . ."
AT&T's and WorldCom's claim that Qwest has acted improperly by retaining Stopwatch is therefore unfounded. The Procedural Order did not preclude Qwest from considering vendors other than TNS, and Qwest's inquiries demonstrated that only Stopwatch could perform the work required for Qwest to comply with the Commission's directives. For these reasons and those summarized below, the Commission should not preclude Qwest from using Stopwatch. The more prudent course is to allow Qwest to produce model results based on Stopwatch's preparation of the data. This approach will not prevent AT&T and WorldCom from retaining TNS and producing results based on TNS data; in fact, the Commission likely would benefit from comparing the results of the two model runs. This approach is most likely to accomplish to the ultimate goal of this process -- the timely production of accurate, verifiable results.

II. Factual Background

A brief review of the circumstances that caused Qwest to retain Stopwatch demonstrates that Qwest acted logically and in full compliance with the Procedural Order.

Mr. Copeland called TNS on April 9 immediately after seeing Commissioner Spitzer's proposed amendment number 1 to determine if TNS could prepare Qwest's 2000 customer location data for use in the HAI model if the Commission adopted Commissioner Spitzer's amendment. Affidavit of Peter Copeland ("Copeland Aff.") ¶2. A TNS representative, Charles White, responded that the 2000 Census information that TNS would need to prepare the data was unavailable since the United States Bureau of Census had not released the information yet.¹ Because of the incompleteness of the 2000 Census data, TNS would not be able to use 2000 data to prepare Qwest's 2000 customer location for use in the HAI model. Mr. White also stated that if TNS were to prepare the 2000 customer location data -- presumably using Census data prior to 2000 -- it would require four weeks from the receipt of the data to complete the process. Copeland Aff. ¶¶ 4, 5.

¹ Mr. White apparently was referring to the United States Census Bureau's Summary File 3 ("SF3"), which the Census Bureau is expected to release this summer. The SF3 File contains detailed demographic information, including housing units and income, by Census Block groups.
TNS' proposal to use pre-2000 Census information to prepare Qwest's 2000 customer location data was unacceptable, since that approach would lead to the same type of data inconsistencies that Commissioner Spitzer's amendment attempted to redress (i.e., 2000 line counts and pre-2000 customer location data). As a result, Mr. Copeland contacted Stopwatch to determine if it would be able to prepare the customer location data using 2000 Census information. Stopwatch has extensive experience with the HAI model, having prepared customer location data for use in the model in multiple proceedings in several different states, including Idaho, Minnesota, Nebraska, and Washington. Stopwatch also developed the original terrain data used in the HAI model and performed the geocoding for the BellSouth cost model that AT&T and WorldCom witnesses have referred to in this docket. Copeland Aff. ¶ 8.

The Stopwatch representative with whom Mr. Copeland spoke, Philip Bolian, told Mr. Copeland that Stopwatch would be able to prepare the data using (1) 2000 Census Bureau block data that provides household counts by census block and (2) 2000 Census Bureau TIGER data for placing surrogate customer points along roads. Mr. Bolian also stated that Stopwatch could complete the process within 17 days of receiving the Qwest 2000 customer location data. Copeland Aff. ¶ 9.

Meanwhile, at the Open Meeting on April 11, the Commission adopted Commissioner Spitzer's amendment number 1 for the express purpose of eliminating the flawed results created by using Arizona line counts from 2000 and customer location data from 1997. As later reflected in the April 19 Procedural Order, the Commission ordered Qwest to (1) produce the 2000 customer location data by May 1 and (2) format the data and run it through the HAI model. Neither the oral instructions from the Commission at the Open Meeting nor the April 19

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2 "TIGER" refers to the Census Bureau's Topologically Integrated Geographic Encoding and Referencing database. The census block data were part of the Census Bureau's Summary File 1 ("SF1"), released in 2001, and the 2000 TIGER files were released shortly after the release of SF1. The SF1 has more general information than the SF3 file described earlier – it includes household and population counts by Census Block groups.
Procedural Order directed Qwest to use a specific vendor to prepare the customer location data for use in the HAI model. The Procedural Order directs only that:

Qwest shall have the data formatted and run through the HAI model and provide such results to the parties and to the Commission, as soon as possible after May 1, but no later than May 24, 2002.

According to the information provided by Mr. White, TNS could not meet this requirement that Qwest produce model results based on 2000 line counts and 2000 customer location data by May 24. TNS had proposed to use some pre-2000 Census data, and its requirement of four weeks to prepare the data would not permit Qwest to meet the deadline of May 24. Accordingly, Qwest retained Stopwatch and announced during the April 16 procedural conference that it would not use TNS. No party objected or suggested that Qwest was required to use only TNS. Since that conference, Stopwatch has been performing data pre-programming to ensure that Qwest will be able to produce model results by May 24.

III. Discussion

As these facts show, there is no merit to AT&T's and WorldCom's claim -- first made two weeks after Qwest announced it did not intend to use TNS -- that Qwest has violated the Procedural Order by not retaining TNS. Indeed, Qwest retained Stopwatch instead of TNS precisely to ensure compliance with the Commission's Order. Moreover, as discussed below, unlike TNS, Stopwatch will provide the parties and the Commission with all the information needed to evaluate fully the process it uses to prepare the customer location data, including all algorithms and data. TNS refuses to disclose this information, thereby precluding any meaningful opportunity to evaluate whether customers are located accurately. Basic fairness and due process require that the parties have this opportunity.

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3 In addition to waiting two weeks to express any concern about Qwest's decision to use Stopwatch, when AT&T and WorldCom eventually filed their request for clarification, they inexplicably served Qwest only by regular mail. As a result, other parties received the pleading before Qwest, and one of Qwest's counsel had not seen the pleading when the Commission and the Administrative Law Judge heard argument on the Request for Clarification on April 30.
A. There Are Significant Benefits To Allowing Qwest To Rely On Stopwatch Maps To Prepare Qwest's 2000 Customer Location Data For Use In The HAI Model.

If the parties rely solely on TNS to prepare the customer location data for use in the HAI model, there will be a significant risk that the data inconsistencies that led to Commissioner Spitzer's amendment number 1 will not be fully eliminated. In the version of the HAI model that AT&T and WorldCom originally presented in this docket, the model used customer clusters that TNS prepared based in part upon Census Block data from 1990 (extrapolated to 1996) and the Census TIGER road data. The detailed demographic and housing unit information included within these data have not been released by the Census Bureau for 2000, which is why Mr. White said that TNS would have to rely on some pre-2000 Census data. In other words, the only way that TNS can duplicate the method it originally followed to prepare the customer clusters would be to use pre-2000 data, which would not cure the flaws that underlie Commissioner Spitzer's amendment. However, Stopwatch Maps can accurately geocode Qwest's customer locations and place road surrogate locations without these Census data. The unavailability of the 2000 Census data to which Mr. White was apparently referring, therefore, does not prevent Stopwatch from preparing Qwest's 2000 customer location data to match the use of the 2000 line counts in the HAI model.

Relying solely on TNS to prepare the data also will jeopardize Qwest's ability to meet the May 24 deadline for producing model results. In the Open Meeting, the Commission appropriately stressed the importance of resolving this issue quickly. Unless TNS has agreed to a shorter timeframe for AT&T and WorldCom than it offered to Qwest, it will produce the customer location data after May 24. By contrast, Stopwatch has begun preparing the customer location data and has assured Qwest that its work will be done in time for Qwest to meet the deadline.
Equally significant, it is clear that absent an order from the Commission, TNS will not produce the information needed to audit its results. As Mr. Copeland explains, the accuracy of TNS' customer placements and clustering process cannot be determined without access to the clustering algorithm, the road surrogate algorithm, and the output data generated at every step of these processes. TNS has never provided access to this information, even to AT&T and WorldCom. Unlike TNS, Stopwatch has agreed to provide all the information needed to evaluate the accuracy of its results, including the algorithms it uses and step-by-step results. In addition, the results that Stopwatch obtains will provide a meaningful measure of the reasonableness of TNS' results, a tool that will be critical if TNS continues to abide by its practice of withholding the information needed to evaluate its work. Comparing these results should only help the Commission.

In sum, the procedures that the Commission follows for this process should lead to timely, accurate, and verifiable results. These objectives will be seriously compromised if the Commission excludes an analysis by Stopwatch and relies solely on TNS.

4 If TNS performs any work on the 2000 customer location data that Qwest has provided, Qwest requests that the Commission order TNS to provide access to its algorithms, step-by-step data outputs, and any other information needed to evaluate the accuracy of its work.

5 In their attempt to prohibit Qwest from relying on Stopwatch, AT&T and WorldCom argue that the use of another vendor will "result in protracted and contentious additional proceedings." Request for Clarification at 3. This is a substantial exaggeration; the use of two vendors actually could reduce the amount of time this process will take. It is possible that separate HAI runs based on TNS and Stopwatch data will produce similar results. If that is the case, there will be little dispute and a minimal amount of time will be required to resolve this issue. Even if that is not the case, the parties will need only a limited amount of discovery relating to the vendors' preparation of the customer data; it is difficult to imagine that more than a week or two of discovery would be needed for this narrow subject. In addition, if a hearing were necessary, Qwest's use of Stopwatch likely would add only one additional witness to the proceeding. Most important, the relatively small amount of additional effort that could result from using two vendors is more than justified by the overriding objective of this process -- obtaining results that are accurate and reliable.
B. The Commission Should Not Require Qwest To Pay AT&T's and WorldCom's Vendor To Prepare Customer Location Data.

In addition to seeking to preclude Qwest from using Stopwatch Maps, AT&T's and WorldCom's request for clarification asks the Commission to require Qwest to pay one-half of the unidentified costs of using TNS. The Commission should reject this request.

The Procedural Order specifically directs that "Qwest shall have the data formatted and run through the HAI model . . . ." (emphasis added). Qwest complied with its obligation by investigating both TNS and Stopwatch Maps and retaining Stopwatch after concluding that only Stopwatch would be able to prepare the data properly and in time to meet the May 24 deadline. Having chosen Stopwatch as the best party to meet its obligations under the Procedural Order, Qwest will pay all of Stopwatch's costs. If AT&T and WorldCom choose to retain TNS, they should pay all of TNS' costs, just as Qwest will pay all of Stopwatch's costs.

IV. Conclusion

For the reasons stated, the Commission should: (1) order that Qwest is permitted to rely on Stopwatch Maps to prepare the customer location data for use in the HAI model; (2) require TNS to provide the parties and the Commission with access to its algorithms and step-by-step
data outputs in connection with any work it performs on the customer location data; and
(3) deny AT&T's and WorldCom's request that Qwest contribute to TNS' compensation.

DATED: May 3, 2002

Respectfully submitted,

Qwest Corporation

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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

IN THE MATTER OF INVESTIGATION
INTO QWEST CORPORATION'S
COMPLIANCE WITH CERTAIN
WHOLESALE PRICING
REQUIREMENTS FOR UNBUNDLED
NETWORK ELEMENTS AND RESALE
DISCOUNTS.

DOCKET NO. T-00000A-00-0194
PHASE II

AFFIDAVIT OF PETER COPELAND IN SUPPORT OF QWEST CORPORATION'S RESPONSE TO AT&T'S AND WORLDCOM'S REQUEST FOR CLARIFICATION OF THE APRIL 19, 2002 PROCEDURAL ORDER

STATE OF COLORADO ) ) ss.
County of Denver )

Peter Copeland, being first duly sworn upon his oath deposes and states:

1. I am employed by Qwest Corporation as Director of Service Cost and Economic Analysis. My job responsibilities include developing and overseeing Qwest's TELRIC and TSLRIC cost studies for wholesale and retail products. I am submitting this affidavit in support of Qwest's response to AT&T's and WorldCom's Request for Clarification of the April 19, 2002 Procedural Order.

2. On April 8, 2002, Commissioner Spitzer of the Arizona Corporation Commission proposed an amendment to the Administrative Law Judges' Recommended Opinion and Order that required "Qwest to provide year 2000 customer location data" for use in the HAI model, version 5.2a. The stated purpose of the amendment was to require the use of year 2000 line count data and year 2000 customer location data in HAI, thereby correcting the problems that
result from the model's original use of 1997 customer location data and 2000 line count data. Upon seeing the proposed amendment, on April 9, 2002, I called TNS Telecoms ("TNS") and talked to Mr. Charles White, who is TNS' Managing Director Internet Business Development and Product Management. The purpose of the call was to determine if TNS could prepare Qwest's 2000 customer location data for use in the HAI Model.

3. I told Mr. White that Qwest was considering using its year 2000 Arizona customer location data in the HAI model, and that we wanted to use the 2000 United States Census Bureau information to place customers who could not be geocoded at surrogate points. The use of these 2000 Census data -- Census Block data and Census TIGER road information\(^1\) -- will lead to consistency between the year 2000 line counts and geocoded customer locations. In fact, using a data source other than year 2000 Census data would fail to reconcile the line count data and the customer location data, causing the same inconsistencies that Commissioner Spitzer's amendment attempted to avoid.

4. Mr. White told me that TNS would not be able to use the 2000 Census Block data or the 2000 Census Bureau TIGER road information to process Qwest's 2000 customer location data. It is my understanding from our conversation that the 2000 Census data that was needed to follow the HAI procedures for placing customer locations was not yet available from the United States Census Bureau and that TNS would use an older version of the data to process the locations and to create the HAI cluster input files.

5. I also asked Mr. White to estimate how long it would take TNS to prepare the necessary HAI cluster input files using Qwest's customer location data, even if TNS were to use pre-2000 Census data. He responded that TNS could complete the process four weeks from its receipt of the customer location data.

\(^1\) "TIGER" refers to the Census Bureau's Topologically Integrated Geographic Encoding and Referencing database.
6. Based on past experience that I have had with TNS, including on-site visits at
their facility in Pennsylvania, I know that their practice is to treat their clustering algorithms as
highly proprietary. To my knowledge, they do not provide access to the algorithms they utilize
to place surrogate points and to create the clusters for use in the HAI Model. In fact, I attended
the deposition of the AT&T/WorldCom witness, Douglas Denney, who sponsored the HAI
model in this proceeding, during which he acknowledged that he had not seen even the customer
location data that TNS used to create the customer clusters used in the model that he sponsored.
I have personally been involved in reviewing the HAI model since its inception in 1994. To my
knowledge, the TNS algorithms have never been disclosed in public filings of the HAI Model or
even to AT&T and WorldCom, the primary sponsors of the model. TNS also has refused to
make them available for inspection by parties who pay TNS to obtain limited access to TNS' 
customer location data. On the two occasions that I have been given limited access to the TNS
data used in the HAI model in connection with proceedings in other states, TNS did not allow me
to review the algorithms. They permitted access only to the cluster data and customer points.
Qwest was required to pay TNS a total of approximately $30,000 for these two limited reviews.

7. Without access to the TNS algorithms and the output data at each step of their
geocoding process, it is not possible to audit TNS' results and processes for accuracy. For any
meaningful review of the work and results, TNS must provide all steps, algorithms, and data
used in geocoding locations, placing surrogate points, and clustering customer locations. TNS
has never provided this level of access to its processes or data.

8. Because of our concerns with the ability of TNS to use the correct data and to
complete the preparation of Qwest's 2000 customer location data quickly enough to meet the
Commission's deadline of May 24, 2002 for producing model results, I contacted Stopwatch
Maps to discuss an alternative way of obtaining geocoded data to be inserted into the HAI model.
Stopwatch is a highly qualified geographic information service firm, with a long history of
involvement in the development of telecommunications cost models. Its qualifications and experience include:

- Analyzing HAI 5.0 customer location and cluster information for Qwest and other parties in numerous unbundled network element and universal service proceedings, including the FCC universal service proceeding.
- Developing national customer location and geographic information for the BCPM model and developing the original terrain data utilized by the HAI Model.
- Providing geographic analysis, development, and support for the Bell South loop cost model that utilizes geo-coded customer location data and road data for developing loop cost.

9. Stopwatch agreed to complete the task within 17 calendar days of receiving the year 2000 customer locations from Qwest. Stopwatch also agreed to use year 2000 Census data and year 2000 Census Bureau TIGER road data so that its clusters would match the year 2000 line counts.

10. Recognizing that the preparation of the customer location data needed to be open to full evaluation by the Commission and the parties, I asked Stopwatch to identify the information it would provide to allow audits of its work. Stopwatch agreed to provide the following data, which will permit Qwest or any other party to this proceeding to audit the accuracy and reasonableness of its methods in geocoding the data and developing cluster information:

- Algorithms for placing surrogate customer locations.
- Algorithms for creating clusters.
- Algorithms for calculating strand distance (right angle minimum spanning tree).
- Intermediate results of the following processes: geocoding; road surrogation of non-geo-coded customer locations; and raw cluster results (convex hulls and customer points).
11. On April 15, 2002, Qwest engaged Stopwatch Maps to perform the geocoding. Since that time, Stopwatch has been performing various programming activities so that it could complete the task in time for Qwest to provide HAI model runs prior to May 24.

DATED this 3rd day of May, 2002.

PETER COPELAND

SUBSCRIBED AND SWORN TO before me this 3rd day of May, 2002.

Donna S. Ontano

My Commission Expires: 12/17/2002

12/9/02 11:28:27