

Decision 89 02 058 FEB 24 1989

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

MARTIN G. LEWIS,

Complainant,

vs.

GENERAL TELEPHONE COMPANY OF
CALIFORNIA AND AT&T COMMUNICATIONS
OF CALIFORNIA, INC., and Possibly
others to be Added Later,

Defendants.

And Related Matters.

FEB 27 1989

Case 87-02-053
(Filed February 19, 1987)

Case 87-02-054
Case 87-02-055
Case 87-02-056
Case 87-02-057
(Filed February 19, 1987)

Martin G. Lewis, for himself, complainant.
James A. Garriss, Attorney at Law, for GTE
California (formerly General Telephone
Company of California), and Gary B. Witt
and Carole A. Priven, Attorneys at Law,
for AT&T Communications of California,
defendants.

O P I N I O N

Complainant Martin G. Lewis (Lewis) seeks an order directing defendant GTE California Incorporated (GTEC, formerly General Telephone Company of California) to supply him with workable, reliable phone service, and refund all monies paid GTEC; requests an investigation into the management practices of GTEC which do not allow a customer who is having serious problems to reach people who have the ability to resolve the problems in a

timely manner; requests an investigation of AT&T Communications of California (AT&T) and any others using devices that may cause regular customer problems; and requests an increase in the Liability Clause from the current \$10,000 to \$50,000. Duly noticed hearings were held before Administrative Law Judge (ALJ) N. R. Johnson in Los Angeles on August 19 and 20, 1987; September 30, 1987; December 1 and 2, 1987; and February 16 and 17, 1988; and the matter was submitted on concurrent briefs due April 25, 1988.

Testimony was presented on behalf of Lewis by himself and by the following GTEC employees appearing as adverse witnesses under Evidence Code Section 776: Special network analysts W. C. Rodarme and B. A. Nirenberg, Equipment maintainer Ralph Alaniz and Vice-President of Customer Relations Karen S. Shaw; by AT&T's engineering manager in Pleasanton Robert T. O'Shea, as an adverse witness under Evidence Code Section 776; and on behalf of GTEC by W. C. Rodarme.

I. Position of Lewis

Testimony and exhibits presented on behalf of Lewis indicated that:

1. Lewis was a financial advisor operating out of his house and it was mandatory that he have good telephone service in order to conduct his business.

2. The poor telephone service provided by GTEC caused him to lose thousands of dollars in commissions and finally resulted in his going out of business.

3. Lewis had two local service lines (805) 498-6888 and (805) 699-1611; two incoming Wide Area Telecommunications Services (WATS) lines, installed October 17, 1985, (800) 255-6255 which converted to (805) 499-3524 and (805) 499-3525; and two outgoing WATS lines, installed October 17, 1985, (805) 137-5396 and (805) 137-5399.

4. AT&T installed a Toll Fraud Control (TFC) feature to prevent fraudulent use of AT&T's long distance network. TFC was implemented by AT&T in Southern California in late March 1986. AT&T agreed to exempt GTEC switch locations from TFC. However, SHOK-5, a Pacific Bell (Pacific) switch was not exempted from TFC. Overflow traffic to Lewis was routed from SHOK-2 to SHOK-5; consequently if answer supervision was not present, TFC would activate. SHOK-5 was exempted from TFC on September 11, 1986.

5. TFC could cause two service problems: First, where answer supervision was lacking, there could be one-way transmission problems where the calling party can hear but can't be heard, and second, where answer supervision is bouncing on and off the call connection, the condition could be perceived as cutoffs on the line.

6. Factors which could cause the TFC feature to disrupt the two-way talk path include the loss of line supervision and bouncing answer supervision discussed above, a delayed answer supervision signal, network equipment failures in either GTEC or AT&T systems, Customer Provided Equipment (CPE), option problems in the local exchange company, circuit problems, the trunks between AT&T's 4ESS switch and the local switching office, and non-common channel interoffice equipment troubles.

7. Lewis did not report all troubles experienced but those reported include:

a. In-WATS 800-255-6255

(1) Low volume. - Can't be heard.
12/31/85, 3/5/87.

(2) Can't be called. - Ring no
answer (RNA). - (One-way
transmission).
1/14/86, 1/15/86, 4/16/86, 4/18/86,
4/21/86, 4/24/86, 4/29/86, 6/3/ -
6/5/86, 6/17/86, 7/8/86, 7/11/86,
9/3/86.

- (3) Cuts off during conversation.
3/18/86, 2/3/87, 10/6/86, 12/26/86,
2/17/87.
- (4) Noisy line.
4/8/86, 7/25/86, 2/29/86, 8/5/86,
9/10/86.
- (5) Receives 1/2 rings.
6/6/86, 8/4/86.
- (6) Low or faint ringing.
6/10/86.
- (7) Hears clicks.
7/21/86, 8/1/86, 8/29/86.
- (8) CPE phones won't answer line.
7/22/86.
- (9) Bell rings after hanging up.
8/21/86.

b. Out-WATS (805) 137-5396

- (1) Low volume.
12/31/85, 1/2/86.
- (2) High-pitched tone on line.
3/18/86.

c. Out-WATS (805) 137-5399

- (1) Low volume.
1/2/86.
- (2) High-pitched tone on line.
3/18/86.

d. Local line 498-6888

- (1) Static.
2/25/86, 4/8/86, 7/25/86, 8/7/86.
- (2) No dial tone.
4/24/86, 3/15/87.
- (3) Can't hear.
8/12/86, 3/5/87.

- (4) High-pitched squeal.
9/22/86.
- (5) Flutter on answer.
10/23/86.
- (6) Clicking.
2/10/87.
- (7) Can't call out.
2/18/87.

e. Local line 499-1611

- (1) No dial tone.
11/5/85, 11/19/86, 2/3/87.
- (2) Answer to click.
10/1/86, 2/9/87.
- (3) Fluttering on lines.
10/23/86.
- (4) Low volume.
3/5/87.
- (5) Hum on line.
3/15/87.

8. GTEC personnel investigated each and every complaint and found:

a. In-WATS (800) 255-6255

- (1) Low volume, can not be called, and cuts off during conversation generally caused by faulty CPE equipment.
- (2) During various inspections, GTEC personnel found and replaced a bad in-WATS card, removed a howling repeater, replaced defective DRM 101 W long line, and busied out a bad SHOK-02 trunk. On the rest of the inspections, GTEC personnel reported finding no trouble.
- (3) When traffic was heavy, calls were routed through SHOK-5 resulting in

operation of TFC. Removed from SHOK-5
on September 11, 1986.

- b. Out-WATS (805) 137-5396
 - (1) Low volume due to faulty CPE.
 - (2) High-pitch tone on line corrected by adjusting repeater.
- c. Out-WATS (805) 137-5399
 - (1) High-pitch tone in line corrected by adjusting repeater.
- d. Local line (805) 498-6888
 - (1) Twenty-four tests were conducted from 10/31/85 to 3/15/87. On 8/7/86, replaced bad wiper. Local loop treatment installed between 8/15/86 and 8/19/86. No trouble found in balance of tests.
- e. Local line (805) 499-1611
 - (1) Nine tests were conducted from 11/5/85 to 3/15/87. Found and corrected wet yellow jacket on 4/6/86 and 3 failing connectors on 10/27/86. No trouble found on balance of tests.
- f. On all WATS lines
 - (1) Local loop current was found to be 17.4 mils, whereas the required minimum is 20.0 mils. Installed DRML01W long lines with 72 volts boost between July 11 and July 14, 1986 to raise loop current although the 17.4 mils was sufficient to operate equipment.
 - (2) Found 72 volt boost caused CPE phone to ring after hangup so re-optioned to 48 volt boost.
 - (3) Installed DSE 7422 long lines on each of Lewis' individual lines.

9. Lewis installed Radio Shack phones because they were the only ones that he could find where the phone unit itself included four lines. He had two phones hooked up to the four WATS lines and another phone for local service.

10. Throughout the complaint process, GTEC, time after time, whether by suggestion or by statement, told him that his phone was the cause of most of his problems. As a result, he has had four different telephone systems installed and has spent numerous hours with numerous engineers representing those different phone manufacturers. These engineers, after doing research and checking, would not acknowledge that any of the problems experienced by Lewis were related to the phones.

11. Since GTEC has replaced the step-by-step switch with a digital switch, Lewis has had none of the recurring problems he previously experienced.

12. GTEC servicemen would come to his premises in the early morning and work straight through to noon. During these periods Lewis was unable to use his phones.

13. It was extremely difficult to reach GTEC personnel at a high enough level to be able to resolve his specific complaints.

14. After taking months to reach a high enough level within GTEC to resolve the problems, Lewis was informed there should be no more supervisory or management assistance or communications on his lines, and that if he had any problems he should call repair service (611).

15. Lewis made a number of calls trying unsuccessfully to reach President Anderson. Finally, he presented himself at President Anderson's office and refused to leave until he talked to him.

16. In trying to resolve his problems, Lewis talked to more than 60 GTEC service, legal, and a variety of other personnel.

17. Lewis received a 100% credit adjustment for WATS service in the amount of \$1,110.57 for the 267 day period from October 17,

1985 (date of service), to July 10, 1986 (date of installation of long lines), or \$4.16 a day. He also received \$100.61 to compensate for the 163 test calls initiated by GTEC.

II. Position of GTEC

Testimony and exhibits presented on behalf of GTEC indicated that:

1. The manufacturers' tests performed on Lewis' instruments were inadequate for purposes of diagnosing some of the problems that Lewis was experiencing in that the DC resistance measurement was from ring to tip and did not indicate the resistance from one of the conductors of line 1 to one of the conductors of line 2.

2. When the GTEC witness performed appropriate tests on Lewis' instruments, he found that the battery potential on one of the conductors of line 1 was being crossed to one of the conductors on line 2.

3. During the complaint investigation, GTEC should have treated the local loop both for current and for volume (done about late July 1986), AT&T should have had the TFC disabled (completed September 11, 1986), and the CPE instruments should have been repaired.

4. The lack of loop treatment could have caused low volume, possibly trip the ring, and possible rings after phone answered.

5. TFC could have caused the "can't hear the calling party" when answered.

6. The crossed lines between line 1 and line 2 on CPE could have caused pre-ring trip, possible answer--can't hear the calling party, calling party can't be heard, cross talk, hum, excessive noise, possible interference with operation of answer phone, and possible calling party no ring.

7. After clearing the TFC and applying the local loop treatment, all of GTEC's test calls were 99.9 percent no failures using GTEC instruments at the demarcation point.

8. After inspecting each of Lewis' telephone sets, GTEC's witness had difficulties confirming installation repair people's findings that many of Lewis' problems were caused by defective CPE.

9. Radio Shack Engineering Department could provide no evidence of a ringing problem of any kind with the System 404 Telephone.

10. The Panasonic model KX-T 3130 B and KX-T 3135 telephones manufactured by Matsushita Electric Corp. have no service history of line disconnect when the other line is in an off-hook mode.

III. Position of AT&T

AT&T's representative Robert T. O'Shea presented testimony on behalf of Lewis as an adverse witness. His testimony was summarized previously in this decision. AT&T's position is set forth in its brief as follows:

1. Lewis submitted no proof that AT&T violated any provision of law or any order or rule of this Commission.

2. The only allegations regarding AT&T concerned TFC, which could only impact Lewis' telephone service minimally, if at all.

3. Evidence presented indicated TFC was designed to detect, not to create, customer problems.

4. If a condition of no answer supervision exists on a call, TFC will activate and not permit two-way conversation. However, California PUC Tariff A4.1.5A indicates that answer supervision is necessary so that chargeable time begins on the call.

5. Testimony presented by GTEC indicated that a condition of no answer supervision could have been generated by work done on Lewis' telephone lines by GTEC technicians, or by malfunctioning CPE.

6. Lewis' complaints preceded the installation of TFC in late March of 1986 and continued after TFC had been removed from all involved switches. Consequently, AT&T's maximum involvement, if any, was during the period March 1986 to September 1986.

7. The only complaints that could possibly be attributable to TFC are one-way transmission problems where the calling party can hear but can't be heard. In cases where answer supervision is bouncing on and off the call connection, the condition could be perceived as cutoffs in the line. Complaints registered by Lewis that could not be caused by TFC include: static during telephone calls, ring backs, incoming calls connecting to a phone company recording, calling party hearing Lewis only faintly, loud piercing noises, clicks on the line, problems in connection with intraLATA phone calls, and half rings.

8. TFC could only affect incoming WATS calls.

9. AT&T did not exempt TFC from Pacific's SHOK-5 switch at an earlier date, because AT&T did not have notice that TFC was impacting calls at that location.

IV. Discussion

General

As previously stated, Lewis seeks an order directing GTEC to supply him with workable, reliable phone service, and refund all monies paid GTEC; requests an investigation into management practices of GTEC; requests an investigation of AT&T and others using devices that may cause regular customer problems; and requests an increase in the Liability Clause from the current \$10,000 to \$50,000.

According to the record, since the replacement of the step-by-step switch with a digital switch, he has been receiving service satisfying his request that GTEC be ordered to furnish him with workable reliable phone service.

GTEC has already adjusted Lewis' account by \$1,110.57 for his four WATS lines representing a 100% percent adjustment of the base charges for the 267 day period from October 17, 1985 to July 10, 1986. As subsequently discussed, this order provides an additional in-WATS lines adjustment for the period July 10, 1986 to September 11, 1986, as full settlement of the account.

The matter of the increase in the Liability Clause from the current \$10,000 to \$50,000 was not litigated by complainant in this proceeding; consequently, the relief requested is denied.

The requested investigation into management practices of GTEC is subsequently discussed.

The record discloses that AT&T notifies carriers when it is about to install equipment such as toll fraud control that may cause customer problems. We are persuaded that such notification is all that is necessary to protect the subscriber and that no further investigation is warranted.

It is obvious from the copious record of this proceeding that Lewis experienced numerous instances of service problems during the period December 31, 1985 through March 15, 1987.

The causes of the service problems that gave rise to Lewis' complaints appear to relate to TFC, GTEC facilities, and/or CPE. We will address each of these separately. We will also address Lewis' allegations relating to GTEC's attitude toward complainants and deployment of personnel to resolve these complaints.

TFC

TFC, is a software feature installed in AT&T's No. 4 ESS switching systems designed to prevent toll fraud on AT&T's network. TFC is activated on circuits lacking answer supervision, and results in the calling party being able to hear the called party but the called party being unable to hear the calling party. In this complaint, TFC would be operable only on Lewis' incoming WATS lines. Calls to live intercept operators are affected by TFC

because live intercept operators are not required to return to the answer supervisor on the call connection. Since GTEC used live intercept operators, AT&T elected to exempt GTEC's switches from TFC until it upgraded its technology to provide automatic intercept. AT&T did not exempt Pacific switches from TFC, so SHOK-5, a Pacific switch, was not exempt from TFC. However, in periods of heavy load, GTEC calls were routed from SHOK-2 to SHOK-5 and were, therefore, not exempt from TFC. When this fact was brought to the attention of AT&T, SHOK-5 was also exempted from TFC, effective September 11, 1986.

A review of the trouble reports for Lewis' in-WATS line for the period March 25, 1986 to September 11, 1986, the period that TFC was operative at SHOK-5, reveals that many of such reports were RNA which could be and probably were one-way conversations created by TFC. There were no RNA trouble complaints subsequent to September 11, 1986, tending to confirm the assumption that RNA complaints were in fact one-way conversations caused by TFC.

It should be noted that TFC is activated only when there is no answer supervision. Consequently, the presence of TFC by itself is only a contributory factor for the complaint with the lack of answer supervision being the complementary part required to activate the one-way conversations. According to the record, such lack of answer supervision can be caused by either CPE or GTEC facilities, with no way of knowing for sure which it is. In any event, because of the lack of answer supervision, there appears to be little doubt that the presence of TFC detracted from the quality of in-WATS service enjoyed by Lewis. Under these circumstances, we will order an additional adjustment to cover the period to September 11, 1986, the date when TFC was finally removed. GTEC adjusted the in-WATS lines account by \$489.24 for the 267 day period, from October 17, 1985 to July 10, 1986, or \$1.83 a day. A further adjustment of \$1.83 a day for the 63 day period from

July 10, 1986 to September 11, 1986, equals \$115.44. The order that follows provides for such an additional adjustment.

For the period September 12, 1986, forward all WATS lines complaints were minor in nature and/or caused by CPE equipment. Consequently, no further WATS lines adjustment appears warranted.

GTEC Facilities

During the period covered by this complaint, i.e., December 31, 1985 to March 15, 1987, GTEC personnel performed numerous tests on Lewis' facilities. In most instances, the GTEC facilities tested were found to be performing satisfactorily. GTEC facilities that were repaired, replaced, or added in attempts to alleviate the problems enumerated by Lewis include:

1. April 16, 1986 - Replaced bad in-WATS card.
2. April 29, 1986 - Installed 7101 repeaters because Actual Measured Loss (AML) on the WATS circuits was 8.0 dB rather than specified 4.0 dB.
3. June 17, 1986 - Special moisture protectors replaced and jacks re-terminated as preventative measures.
4. WATS meters and WATS conversion numbers changed as preventative measures.
5. July 11-14, 1986 - Installed DRM 101 W long line with 72-volt boost to increase loop current to 20.0 mils.
6. July 22, 1986 - Re-optioned DRM 101 W to 48-volt boost and bypass ringing to resolve CPE answer phone will not answer line and CPE phone rings after hang up complaints.
7. August 7, 1986 - Built test circuit in attempt to duplicate Lewis' problems.
8. August 15-19, 1986 - Loop treatment performed on local lines so that they would sound like WATS lines.

9. August 19, 1986 - Low level tone on line after repeaters added caused by adjacent repeater howling. Removed repeater.
10. September 9, 1986 - Replaced bad DRM 101 W.
11. September 10, 1986 - Busied out bad SHOK-02 trunk to eliminate static and low volume tone on line.
12. September 29, 1986 - Installed DSE 7422 long line on each of Lewis' lines.
13. October 6, 1986 - Obtained new assignments for main cable and theater cable pairs to eliminate noise on line.
14. October 7, 1986 - Cut to new WAT meter to eliminate intermittent clicks.
15. October 27, 1986 - Removed, bench tested, and placed back in service three connectors.
16. November 18, 1986 - Removed copper sliver bridged between repeaters thus eliminating loud buzz.

It is obvious from the above summary that GTEC personnel took extensive measures to resolve Lewis' complaints as they were reported, and that Lewis' service was wholly satisfactory after GTEC replaced its step-by-step switch with a digital switch in May 1987.

The following tabulation summarizes the number of calls by line and the results of inspections and/or testing by GTEC personnel as set forth in Exhibit 2:

		<u>Complaints</u>	<u>TFC</u>	<u>CPE</u>	<u>No Trouble Found</u>	<u>Repaired</u>
IN-WATS	255-6255	48	9	7	25	7
OUT-WATS (805)	137-5396	4	-	2	1	1
OUT-WATS (805)	137-5399	2	-	-	1	1
Local (805)	498-6888	21	-	-	17	4
Local (805)	499-1611	<u>7</u>	<u>9</u>	<u>9</u>	<u>6</u>	<u>1</u>
		82			50	14

It will be noted that the category "No trouble found" [includes "Tested ok" (TOK) and "Found ok" (FOK)] represents approximately 60 percent of all the complaints and 82 percent of the local lines complaints. It is axiomatic that GTEC personnel cannot take corrective action on facilities that upon testing are found to be operating satisfactorily. In any event, a review of the local line complaints indicates that they were minor in nature, and while annoying, were not of sufficient consequence to warrant any adjustment to these accounts.

CPE

Lewis' primary concern was the quality of service provided by General for the lines Lewis used in conducting his business, i.e., the in-WATS and out-WATS lines. Of the 54 complaints filed on these 4 lines, 9 were found by GTEC personnel to be caused by CPE. According to the record, Lewis completely replaced his CPE on several occasions in an attempt to alleviate the problems associated with this equipment. In spite of this, GTEC personnel found cross battery to ground in all three instruments as late as January 26, 1987. It appears either that Lewis was unfortunate in his acquisition of CPE, or that his inside wiring was defective. In either case, GTEC is not responsible.

Personnel Deployment

Another of Lewis' concerns was his alleged inability to contact someone in GTEC who had the authority to resolve his problems. According to the record, the following deployment of GTEC personnel occurred:

1. December 31, 1985 to January 15, 1986 - 611 personnel deployed. Found low volume on CPE.
2. March 15, 1986 to June 3, 1986 - 611 personnel deployed. Generally found GTEC equipment okay except replaced bad in-WATS card and adjusted repeater.

3. On April 24, 1986, Lewis demanded call back from manager or higher. Referred to repair supervisor, then to repair superintendent.
4. On June 3, 1986, matter referred to network analyst and repair supervisor. GTEC ran extensive tests. At one time, it encountered one-way transmission caused by TFC. Requested test for long lines. WATS installation of long lines and no trouble for several weeks. Analyst felt problem was resolved.
5. On July 11, 1986, a special service analyst was assigned to the matter. He installed long lines, had repair supervisor run numerous tests, had special test circuit installed, had loop treatment installed on local lines, had TFC deprogrammed from SHOK-05, and responded to each and every complaint call through 1986.
6. On July 29, 1986, Customer Relations, headed by a vice-president, became involved in complaint. Coordinated efforts to resolve problems until reached a point where they could do no more and then referred Lewis back to 611 for all future problems.

From the above summary, it can be seen that personnel of widely varying qualifications and managerial positions were involved in the resolution of Lewis' complaints. Consequently, Lewis' position that he was unable to contact anyone with the authority to resolve his problems is without merit.

V. Findings and Conclusions

Findings of Fact

1. Lewis had two local service lines, two in-WATS lines and two out-WATS lines.

2. Lewis experienced numerous instances of service problems as indicated by the number and complexity of complaints registered by him during the period December 31, 1985 through March 15, 1987.

3. Lewis experienced satisfactory service after May 1987 when GTEC replaced the step-by-step switch serving him with a digital switch.

4. The matter of increasing the Liability Clause from the current \$10,000 to \$50,000 was not litigated in this proceeding.

5. The causes of the service deficiencies giving rise to Lewis' complaints relate to TFC, GTEC facilities, and/or CPE.

6. TFC is software feature installed in AT&T's No. 4 ESS switching systems designed to prevent toll fraud on AT&T's network.

7. TFC is activated on circuits lacking in answer supervision and results in one-way transmission. In this case, TFC will affect only Lewis' in-WATS lines.

8. Because GTEC utilized live intercept operators, AT&T elected to exempt GTEC's switches from TFC.

9. SHOK-05, a Pacific switch used as an alternate route for GTEC's overflow traffic, was not exempted from TFC until September 11, 1986.

10. From March 25, 1986 to September 11, 1986, the period TFC was operative, there were numerous instances of one-way conversations probably caused by TFC being activated when there was no answer supervision.

11. The presence of TFC in the above period detracted from the quality of in-WATS service enjoyed by Lewis.

12. Most of the numerous test performed on GTEC facilities during the period of the complaints, i.e., December 31, 1985 to March 15, 1987, revealed that the facilities were operating satisfactorily. However, there were 16 instances of replacement, repair, and/or additions of equipment to Lewis' lines during this period.

13. Lewis' local line complaints were minor in nature and, while annoying, were not of sufficient consequence to warrant any adjustment to these accounts.

14. Of the 54 complaints filed on Lewis' 4 WATS lines, 9 were found by GTEC personnel to be caused by CPE, and were therefore, not attributable to GTEC.

15. GTEC personnel involved with Lewis' complaints had widely ranging qualifications and managerial responsibilities.

16. AT&T notified affected carriers when installing equipment such as TFC features that could possibly cause subscriber problems.

Conclusions of Law

1. The presence of TFC for the period March 25, 1986 to September 11, 1986, detracted from the quality of in-WATS service enjoyed by Lewis justifying a further adjustment of \$115.44

2. In all other respects, the relief requested not already obtained should be denied.

3. The \$3,715.18 on deposit with this Commission should be disbursed by forwarding \$115.44 to Lewis and \$3,599.74 to GTEC.

4. Cases 87-02-053, 87-02-054, 87-02-055, 87-02-056, and 87-02-057 should be closed.

ORDER

IT IS ORDERED that:

1. The deposit of \$3,715.18 on file with this Commission shall be disbursed by forwarding \$115.44 to Martin G. Lewis and \$3,599.74 to GTE California (formerly General Telephone Company of California.)


2. Except as provided in Ordering Paragraph 1, the relief requested by complainant not already obtained is denied and Cases 87-02-053, 87-02-054, 87-02-055, 87-02-056, and 87-02-057 are closed.

This order becomes effective 30 days from today.

Dated FEB 24 1989, at San Francisco, California.

G. MITCHELL WILK
President
FREDERICK R. DUDA
STANLEY W. HULETT
JOHN B. OHANIAN
Commissioners

I CERTIFY THAT THIS DECISION
WAS APPROVED BY THE ABOVE
COMMISSIONERS TODAY.


Victor W. Winters, Executive Director