

Decision 00-03-057

March 16, 2000

## BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service.	Rulemaking 95-04-043 (Filed April 26, 1995)
Order Instituting Investigation on the Commission's Own Motion into Competition for Local Exchange Service.	Investigation 95-04-044 (Filed April 26, 1995)

**ORDER DENYING THE REHEARING OF DECISION (D.) 99-12-051****I. SUMMARY**

In this decision, we deny the rehearing applications of D.99-12-051 filed Pacific Bell and RCN Telecom. D.99-12-051 grants the Petition of the Office of Ratepayer Advocates (ORA), requesting a halt to the implementation of all currently pending overlays previously adopted by Commission decisions. The Decision grants two other petitions, as well, one of which was the City of Berkeley's Petition to Modify D.99-04-024 which halts the start-up of the 510/324 NPA overlay and the 1+10-digit dialing requirement. A Joint Petition to Modify D.99-04-025, filed by the City and County of San Francisco and the County of Marin, is similarly granted to halt the start-up of the 415 NPA overlay and related 1+10-digit dialing. In all, D.99-12-051 suspends the implementation dates for the opening of overlays in the 408, 415, 510, 650, 714, and 909 NPAs, and the institution of mandatory 1+10-digit dialing. In addition, D.99-12-051 institutes a plan to develop a staggered schedule for implementing additional number pooling trials and related measures to address code exhaustion. By this decision, we affirm D.99-12-051.

## II. BACKGROUND

On September 20, 1999, ORA filed an Emergency Petition asking the Commission to suspend the implementation of mandatory 1+10-digit dialing and all currently pending area code overlays previously approved by the Commission. The Commission granted the Petition in D.99-12-051 on December 16, 1999.<sup>1</sup> D.99-12-051 suspended previously adopted overlays and mandatory 1 + 10-digit dialing in the 408, 415, 510, 650, 714, and 909 NPAs. In addition, the Decision granted the City of Berkeley's "Petition to Modify D.99-04-024," halting start-up of the 510/324 NPA overlay and the 1+10-digit dialing requirement, and the City and County of San Francisco's and the County of Marin's Joint Petition to Modify D.99-04-025, halting the start-up of the 415 NPA overlay and the 1+10-digit dialing. Finally, the Commission instituted a plan to develop a staggered schedule for implementing more number pooling trials and related measures.

Pacific Bell (Pacific) filed an application for the rehearing of D.99-12-051 on January 21, 2000, charging that the Decision errs by requiring legally enforceable written agreements for numbers reserved before the effective date of the decision, by allowing only area code splits to be considered for backup relief plans, and by reducing the number of NXX codes distributed through the lottery without first evaluating the demand for numbers. Pacific's arguments were laced with objections to overlays and support for 7-digit dialing.

On the same date, RCN Telecom filed an application for rehearing, alleging that the Decision will unreasonably delay area code relief, the Commission should not institute number pooling simultaneously in multiple metropolitan statistical areas, the Commission should reconsider the impact of its decision on competition and carriers, and the decision is imprudent in advance of a final FCC Order in the *Number Resource Optimization* proceeding.

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<sup>1</sup> The decision was voted out on December 16, 1999, and mailed on December 22, 1999.

GTE California, Inc. (GTEC) filed comments on February 7, 2000 in support of Pacific, essentially mirroring Pacific's position supporting overlays, opposing the application of the LEWA requirement to all reserved numbers, and arguing that exhaust dates should be projected based on reasonable estimates of demand.

Nextlink California, Inc. (Nextlink) also filed its response to the rehearing application on February 7, 2000, asserting that the Commission did not commit legal error by declining to consider overlays with 7-digit dialing as back-up relief plans for number pooling trials. A joint response to rehearing (CCTA Joint Response) was timely filed by the California Cable Television Association (CCTA), MediaOne Telecommunications of California, Inc. (MediaOne), Pac-West Telecomm, Inc.(Pac-West), and AT&T Communications of California, Inc. (AT&T). The CCTA Joint Response also opposed 7-digit overlays, arguing that they are anti-consumer, anti-competitive and against the law. The CCTA Joint Response further asserted that customer demand, and not the indefinite withholding of remaining unassigned codes, should dictate when area code exhaust occurs. Finally, the CCTA Joint Response advocates that emergency procedures must account for customers who do not sign LEWAs.

The Office of Ratepayer Advocates (ORA) and The Utility Reform Network (TURN) filed a Joint Response (ORA Joint Response) to the Applications for Rehearing of D.99-12-051 on February 11, 2000.<sup>2</sup> ORA and TURN concluded that Pacific's and RCN Telecom's rehearing applications do not constitute errors of fact or law. ORA and TURN argue that the rehearing applications represent disagreements with the Commission's policies or erroneous interpretations of the additional authority granted by the FCC to this Commission in the September 15, 1999 Order.<sup>3</sup>

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<sup>2</sup> ORA and TURN requested permission for a late filing in their Motion for Leave to File A Late Response. We herein accept the late filing, as no party is prejudiced thereby.

<sup>3</sup> *In the Matter of California Public Utilities Commission Petition for Delegation of Additional*

### III. DISCUSSION

Pacific and RCN Telecom point to certain aspects of D.99-12-051 with which they disagree; however, their rehearing applications contain little more than vague, general, unsubstantiated allegations of error. PU Code §1732 requires an application for rehearing to set forth specifically the grounds on which the decision or order is considered to be unlawful. These applications do not meet that test. For the reasons below, and pursuant to PU Code §1732, we deny rehearing.

#### A. **The Decision Is Neither Arbitrary Nor Unreasonable in Stating an Intent to Institute a Needs-Based Assessment of Code Allocation.**

Pacific contends the Decision “errs to the extent it *intends to apply*” legally enforceable written agreements (LEWAs) before carriers can request growth codes. (Pacific Rhg. at 3; emphasis added.) LEWAs are one component of the imminent exhaust criteria set forth in D.99-11-027, which adopted emergency allocation procedures for the 310 NPA. In that decision, the Commission determined that in order to make an accurate assessment of need before a carrier can request growth codes, documentation in the form of a written agreement is required.

Pacific’s allegation fails first of all because D.99-12-051 neither requires, nor states an intent to require LEWAs for the NPAs in D.99-12-051. Secondly, any claim of error is undermined by the fact that Pacific’s claim is premature and therefore inactionable at this time. The true facts cannot be expressed more clearly than by ORA and TURN in their Response to Rehearing:

“The Decision does not contain any Ordering Paragraphs (OPs) ordering that the code allocation measures, which were adopted for the 310 NPA, shall also apply to any of the other area codes at issue here. Indeed, it is plain from the text on page 14 of the

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*Authority Pertaining to Area Code Relief and NXX Code Conservation Measures, FCC 99-248, CC Docket No. 96-98, released September 15, 1999 (Order Delegating Additional Authority).*

Decision that the Commission *did not* adopt code allocation measures for any of the 'overlay NPAs.' Rather, the Commission stated its intent to address implementation of such measures at some point in the future, and indicated that it anticipates these measures would be similar, although not necessarily identical, to what was adopted in D.99-11-027 for the 310 NPA." (ORA Rhg. Response, p. 2.)

The Decision does state that the Commission intends to institute a needs-based assessment of code allocation for the affected NPAs *similar to* that adopted for the 310 NPA. (Decision at 14.) The Decision also makes clear that this issue will be addressed in a forthcoming ruling. The Commission must be assured that numbers requested by carriers accurately reflect need and intended utilization. Thus, some means must be devised to ensure that reserved numbers are counted and reported in order to justify carrier applications for growth codes.

In sum, the procedure for the 310 NPA precludes carriers from requesting growth codes if they do not have LEWAs. The same requirement has not been extended to the NPAs in D.99-12-051. This matter will be taken up in a forthcoming ruling. What D.99-12-051 does is to affirm our policy of requiring carriers to demonstrate need prior to receiving scarce numbering resources. This is neither arbitrary nor unreasonable.

**B. The Record Supports Geographic Splits Over Overlays for Back-Up Relief Plans.**

In D.99-12-051, the backup area code relief plans for the affected area codes call for geographic splits. Pacific claims that the Decision, in so providing, is arbitrary, unsupported by the record, and ignores the interests of many Californians. (Pacific at 5.) In making this assertion, Pacific turns a blind eye to the record. The Commission acknowledges that however a new area code is introduced, whether through a geographic split or an overlay, it would be disruptive to customers and therefore revisits the issue with a heightened sense of awareness. (Decision at 7.) The Commission has taken, and continues to take,

the steps necessary to solicit the views of the public regarding overlays versus splits, as indeed it is required to do under Public Utilities Code §7931.<sup>4</sup> Public hearings, town hall meetings, and customer surveys were undertaken by various carriers and ORA. Customer surveys conducted by various carriers in 1996 showed a definite public preference for geographic splits.<sup>5</sup> In 1999, ORA conducted a survey of customer preferences on area code relief options which showed that most customers favored geographic splits to overlays.

D.99-12-051 was precipitated by public disdain for overlays in the affected NPAs. ORA, on behalf of California ratepayers, petitioned the Commission to halt the start-up of all area code overlays previously approved by Commission decisions. On behalf of its residents, the City of Berkeley filed a Petition to Modify D.99-04-024 to halt the start up of overlays in the 510/324 NPA and mandatory 1+10-digit dialing. Similarly, the City and County of San Francisco and the County of Marin jointly filed a Petition to Modify D.99-04-025 to suspend the start-up of the 415 NPA overlay, along with the related 1+10-digit dialing requirement.

Pacific's claim that the Petitions to Modify objected to overlays only because of the 10-digit dialing requirement is unsupported. (Pacific Rhg. at 5.) Pacific used this opening to segue into its pitch for 7-digit dialing. As Pacific acknowledges, the Commission has considered a proposal for an overlay with a 7-digit dialing plan in the Petition to Modify D.98-06-018, which ordered a two-phase split in the 619 NPA. In D.00-01-023, the Commission decided against an overlay with a 7-digit dialing plan, finding that such a plan violates FCC rules and would be anti-competitive. Our position remains unchanged, and we concur with

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<sup>4</sup> PU Code §7931 has stringent notice and public meeting requirements before new area codes can be implemented.

<sup>5</sup> See *Order Instituting Rulemaking on the Commission's Own Motion Regarding Commission Policy on Area Code Relief*, mimeo at 16 (filed 12/17/98). Three consumer surveys were conducted by Pacific Bell, GTE California, and the Area Code Coalition which included ICG Access Services, AT&T Communications, California Cable Television Association, Sprint, MFS, TCG and MCI.

the CCTA Joint Applicants that 7-digit overlays are anti-consumer, anti-competitive, and violate FCC rules.<sup>6</sup> Nextlink, too, shares the view that the Commission is correct in not considering an overlay with 7-digit dialing as a back-up relief plan.

Pacific acknowledges that the FCC requires 10-digit dialing for all overlays and that the FCC recently reaffirmed its 10-digit dialing requirement.<sup>7</sup> However, Pacific holds out hope that the issue of 7-digit dialing still has life by referencing the U.S. Court of Appeals for the Second Circuit's stay of the 10-digit dialing requirement in New York. As CCTA and ORA point out in their Rehearing Response, the circumstances in New York are unique, and the stay was issued on purely procedural grounds. Specifically, the stay was conditioned on the New York Public Service Commission's implementation of number portability, number pooling, and a non-discriminatory number assignment system in area code overlay regions.<sup>8</sup> Furthermore, the fact that New York currently has 7-digit dialing for overlays does not mandate its use here since Second Circuit decisions are not controlling in California.

**C. The Decision Does Not Misconstrue When Code Exhaustion Occurs.**

In an effort to find an issue that may have some gravity, Pacific claims that the Commission misconstrues code "exhaust." The Commission is accused of construing "exhaust" very narrowly to mean the point at which there are no more unassigned NXX codes in the NPA. (Pacific Rhg. at 7.) Pacific bases its conclusion on the following excerpt from the Decision:

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<sup>6</sup> CCTA Joint Response to Rehearing, pp. 3-5.

<sup>7</sup> Pacific Rhg. At 6. *See Third Order on Reconsideration of Second Report & Order and Memorandum Opinion & Order*, FCC Docket No. 96-98; CC Docket No. 95-185, ¶34 (rel. October 21, 1999).

<sup>8</sup> *People of the State of New York and Public Service Commission of the State of New York v. FCC and the United States of America*, U.S. Court of Appeals for Second Circuit, Docket No. 99-3015 (March 28, 1999).

“These previously projected exhaustion dates have recently been further extended by action of the Commission’s Telecommunications Division Director, directing the NANPA to reduce the monthly allotment of NXX codes given out in each of the NPAs subject to an overlay.” (Decision at 11.)

From this statement, Pacific leaps to the conclusion that the Decision *assumes* that exhaust can be postponed by giving out fewer and fewer NXX codes. Pacific is entirely mistaken. The Commission uses a combination of relief and conservation measures to ameliorate code exhaustion. Pacific has failed to show legal error.

We are cognizant of the fact that demand for telephone numbers is an essential factor in considering when an NPA may exhaust. The Commission shares oversight responsibility for accurately forecasting demand, and therefore takes seriously its efforts to seek out unused or underutilized numbers. We are well aware that the numbering crisis is attributable in large part to the inefficient distribution of numbers that was the norm prior to thousands-block pooling. We concur with ORA and TURN that exhaust projections should be based on the best available demand estimates and that those estimates should be reasonable.<sup>2</sup> The beneficial effects of thousands-block number pooling cannot be ignored. We acknowledge that to the extent that current number projections fail to reflect the impact of number pooling, they do not accurately evaluate available number resources or demand.

**D. RCN Telecom’s Claims of Error Have No Merit.**

RCN Telecom alleges that the Commission goes beyond the FCC’s *Delegation of Additional Authority Order* by implementing number pooling as the sole means to relieve exhaust in the affected NPAs. This claim is baseless. The

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<sup>2</sup> ORA & TURN Rhg. Response, pp. 7-8. They point out that current demand estimates do not include or take into account the effects of 1,000 block number pooling, and therefore current exhaust projections do not reflect the dramatic change in the available supply of numbers. They argue that forecasts that do not include the effects of pooling are not reasonable estimates of demand.



Commission uses a multi-faceted approach and a variety of methods to relieve exhaust in the affected areas. Among the steps that the Commission has taken to relieve exhaust is the Commission's adoption of a three-way split for the 707 NPA.<sup>10</sup> In addition, back-up relief plans are underway for the 408, 415, 510, 650, 714 and 909 NPAs, as evidenced by draft decisions and ALJ Rulings.<sup>11</sup> The Commission continues to institute a number of efficient number usage and conservation practices for codes nearing number exhaustion.

Another ground upon which RCN Telecom rests its rehearing application is the claim that the Commission is instituting number pooling simultaneously in multiple metropolitan statistical areas (MSAs), contrary to the FCC's *Order Delegating Additional Authority*. (RCN Telecom Rhg., p. 3) RCN Telecom misinterprets the FCC's Order, and is confusing the simultaneous notice of intent to conduct number pooling in multiple NPAs with the actual schedule implementating number pooling in those NPAs.

The Commission is aware that thousands-block number pooling trials cannot be implemented simultaneously in different MSAs. The FCC's Order provides that "start dates for thousands-block pooling trials in different MSAs should be appropriately staggered to permit the industry to undertake all necessary steps."<sup>12</sup> Therefore, Ordering Paragraph No. 7 of the Decision requires the Telecommunications Division to develop a plan for the design and implementation of a mandatory number pooling program to be scheduled on a *staggered basis*. Pursuant to D.99-12-051, an Assigned Commissioner's Ruling was issued on January 31, 2000 setting schedule and implementation rules for pooling trials in the 415 and 714 NPAs. The implementation dates are clearly staggered. The implementation of the first pooling trial in the 310 NPA is scheduled to begin on

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<sup>10</sup> See D.99-12-049.

<sup>11</sup> For example, ALJ Ruling of January 19, 2000 solicits comments on back-up relief plans for the 408, 415, 510, 650, 714 and 909 area codes.

<sup>12</sup> *Order Delegating Additional Authority, supra*, ¶20.

March 18, 2000. The 415 NPA number pooling trial is not set to occur until July 29, 2000. A subsequent pooling trial for the 714 NPA is scheduled for November 4, 2000.<sup>13</sup>

RCN also objects to the Decision on the ground that the suspension of overlays and the reduction of NXX code allocations limit the ability of carriers to continue to offer consumers the choice of telecommunications providers. RCN cites the FCC prohibition in the *Order Delegating Additional Authority* against consumers being precluded from receiving telecommunications services of their choice from providers of their choice, as if the mere incantation of this rule substantiates its claim. (RCN Telecom Rhg., pp. 4-5) RCN Telecom's very general allegation, without more, is not sufficient to make the case that consumers are denied a choice of carriers. The Commission is very much aware of the FCC's mandate and is making herculean efforts to see to it that consumers do have a choice of providers.

Finally, RCN claims that the Decision is imprudent in advance of a final FCC Order in the *Number Resource Optimization* proceeding. The basis for this allegation appears to be that "it is quite possible that carriers will have to comply with different requirements imposed by the FCC in the near future." (RCN Telecom Rhg. at 6.) RCN Telecom neither made nor proved a claim of legal error. The Commission is within its rights to use the interim authority delegated by the FCC until a final order is issued decreeing otherwise.

#### IV. CONCLUSION

We have reviewed each and every allegation made by Pacific and RCN Telecom, and are of the opinion that legal error has not been demonstrated. PU Code §1732 requires that an applicant specifically state the ground on which the order or decision is considered to be unlawful or erroneous. Neither Pacific nor RCN Telecom has met this requirement. Accordingly, rehearing is denied.

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<sup>13</sup> See *Assigned Commissioner's Ruling Setting Schedule and Rules for the Implementation of Number Pooling Trials for the 415 and 714 Area Codes* (January 31, 2000), p. 2.

**THEREFORE, it is ordered:**

1. The late-filed Response by ORA and TURN to the Applications for Rehearing is accepted.
2. The Rehearing Application of D.99-12-051 filed by Pacific Bell is denied.
3. The Rehearing Application of D.99-12-051 filed by RCN Telecom is denied.

This order is effective today.

Dated March 16, 2000, at San Francisco, California.

RICHARD A. BILAS  
President  
CARL W. WOOD  
LORETTA M. LYNCH  
Commissioners

I will file a dissent.

/s/ HENRY M. DUQUE  
Commissioner

I dissent.

/s/ JOSIAH L. NEEPER  
Commissioner

Commissioner Henry M. Duque, dissenting:

My analysis of the facts, the record before us, applicable law, relevant federal regulation, differ little from that filed in prior dissents concerning the majority's actions concerning number policy. Once again, I find that the order of the majority substitutes rationing in the guise of conservation for needed number relief. The majority's order is therefore poor policy and transgresses federal and state law and regulation.

The extensive development of Federal telecommunications law and regulations by the Federal Communications Commission (FCC) make the legal failings of the majority's decision particularly easy to demonstrate. The FCC's regulations:

“ . . . generally require that numbering administration: (1) facilitate entry into the telecommunications marketplace by making telecommunications resources available on an efficient and timely basis to telecommunications carriers; (2) not unduly favor or disfavor any particular industry segment or group of telecommunications consumers; and (3) not unduly favor one telecommunications technology over another.”<sup>1</sup>

The application for rehearing filed by RCN Telecom Services of California (RCN) places this issue once again squarely before the Commission today. RCN accurately states that the Commission's actions will unreasonably delay area code relief. Moreover, neither this decision nor the underlying D.99-12-051 reaches any finding on the consequences of the actions that it takes today, thereby failing to comply with the conditions that structure the FCC's delegation of authority to this Commission to order number conservation.

Since a carrier cannot enter a market without telephone numbers, the majority's decision creates a barrier or high hurdle to market entry, and thereby hinders competition. RCN points out that our actions to restrict the allocation of NXX codes in the 408, 510, 650, 714, and 909 NPAs “severely limit the ability of carriers – particularly new entrants – to offer California consumers the choice of telecommunications providers and services to which they have been accustomed and deserve.” (RCN, p.4)

Carriers entering the market for the first time lack the numbering resources that arise from the churning of customers that is a fact of life for all. Thus, for these carriers, the lack of numbers in a rate center or the inability to establish a service “footprint” large enough to generate economies of scope and scale places them at a disadvantage relative to carriers who are already in these markets. These constraints on numbering resources, combined with the random nature of the outcomes of the rationing lottery, work as a de facto barrier to entry.

The FCC recently delegated authority to the California Public Utilities Commission, to implement a number pooling trial.<sup>2</sup> The FCC's delegation of authority,

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<sup>1</sup> This text is quoted from In the Matter of California Public Utilities Commission Petition for Delegation of Additional Authority Pertaining to Area Code Relief and NXX Code Conservation Measures, Order, CC Docket No. 96-98, FCC 99-248 (rel. September 15, 1999, paragraph 2. The underlying regulations are at 47 C.F.R. § 52.9.

<sup>2</sup> In the Matter of California Public Utilities Commission Petition for Delegation of Additional Authority Pertaining to Area Code Relief and NXX Code Conservation Measures, Order, CC Docket No. 96-98, FCC 99-248 (rel. September 15, 1999.

however, came with certain preconditions that the majority's decision fails to meet. Thus, the decision's actions to implement a number pooling trial fail to comport with current FCC requirements. This is critical because Federal laws grant exclusive jurisdiction over numbering to the FCC.<sup>3</sup>

The failure of the majority's decision to meet the FCC's pre-conditions for the lawful exercise of the pooling authority delegated to California is very clear. In particular, the FCC states:

"Thus, the California Commission, to the extent it acts under the authority delegated herein, must ensure that numbers are made available on an equitable basis; the numbering resources are made available on an efficient and timely basis; that whatever policies the California Commission institutes with regard to numbering administration not unduly favor or disfavor any particular telecommunications industry segment or group of telecommunications consumers' and that the California Commission not unduly favor one telecommunications technology over another."<sup>4</sup>

As the above discussion makes clear, D.99-12-051 fails to make telephone numbers available on a timely and equitable basis. Further, the policies adopted in the majority's decision unduly favor and disfavor certain telecommunications technologies and unduly disfavor telecommunications consumers residing in these area codes.

RCN reminds us that the FCC's delegation of authority for a number pooling trial continues to stress that federal policy requires that phone numbers remain available. The FCC cautions:

"The grants of authority herein are not intended to allow the California Commission to engage in number conservation to the exclusion of, or as a substitute for, unavoidable and timely area code relief. While we are giving the California Commission tools that may prolong the lives of the existing area codes, the California Commission continues to bear the obligation of implementing code relief when necessary, and we expect the California Commission to fulfill this obligation in a timely way."<sup>5</sup>

The decision adopted today contains no steps to ensure the availability of phone numbers. Indeed, it avoids the necessary steps needed for timely area code relief

RCN further emphasizes to this Commission that the FCC order places consumers first. (RCN, p. 4). The FCC finds the availability of telephone numbers is essential so

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<sup>3</sup> 47 U.S.C. § 251(e)(1).

<sup>4</sup> In the Matter of California Public Utilities Commission Petition for Delegation of Additional Authority Pertaining to Area Code Relief and NXX Code Conservation Measures, Order, CC Docket No. 96-98, FCC 99-248 (rel. September 15, 1999, paragraph 8. In FCC's includes a footnote citing regulatory and statutory support for these requirements. Footnote 27 references included 47 C.F.R. § 52.9(a) and 47 U.S.C § 251(e)(1).

<sup>5</sup> In the Matter of California Public Utilities Commission Petition for Delegation of Additional Authority Pertaining to Area Code Relief and NXX Code Conservation Measures, Order, CC Docket No. 96-98, FCC 99-248 (rel. September 15, 1999, paragraph 9.

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that customers can exercise choice. Thus, the FCC sets a pre-condition that California must meet before creating a number pool:

“Under no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for a want of numbering resources.”<sup>6</sup>

And again:

“Consumers should never be in the position of being unable to exercise their choice of carrier because that carrier does not have access to numbering resources. This criterion attempts to ensure that consumers continue to retain a choice of telecommunications providers in the event that the pooling trial or trials do not stave off the need for area code relief.”<sup>7</sup>

A review of D.99-12-051 and today’s decision make it clear that the Commission fails to examine in any way whether numbering resources in these six area codes are adequate to meet this condition. Thus, it reaches no finding concerning the availability of numbers to permit consumer choice.

For these reasons, I find that both today’s decision and D.99-12-051 contain legal error. I therefore must respectfully dissent.

/s/ HENRY M. DUQUE

Henry M. Duque  
Commissioner

March 16, 2000

San Francisco

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<sup>6</sup> Ibid.

<sup>7</sup> Ibid, paragraph 15.