

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**TELECOMMUNICATIONS DIVISION**

**RESOLUTION T-15971**

**Date: October 25, 1996**

**R E S O L U T I O N**

**RESOLUTION T-15971. PROVISIONAL AUTHORITY FOR MCI COMMUNICATIONS (U-5011-C) TO PROVIDE SPEECH TO SPEECH RELAY SERVICE UNDER ITS CALIFORNIA RELAY SERVICE CONTRACT WITH THE DEAF AND DISABLED TELECOMMUNICATIONS PROGRAM ADMINISTRATIVE COMMITTEE.**

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**SUMMARY**

By this Resolution, MCI Communications (MCI) and the Deaf and Disabled Telecommunications Program Administrative Committee (DDTPAC or DDTP) are authorized to modify their California Relay Service (CRS) contract to provide Speech to Speech Relay Service. The provisional authority will apply for one year, commencing when MCI can begin providing the service.

**BACKGROUND**

CRS is a statewide program which, pursuant to Public Utilities Code 2881, provides hearing-impaired and speech-impaired persons 24 hour access to California's existing public switched telephone network. Under the program, persons using telecommunications devices for the deaf (TDDs) communicate with non-TDD users, and vice-versa, through the voice assistance of relay system operators. CRS is available for all intrastate, interstate and international calls that originate and terminate in California, but the program only reimburses certified telecommunications companies for their cost to relay intrastate calls. CRS is funded by a small surcharge applied to all intrastate telephone charges. The DDTPAC, supported by a paid staff, manages the day-to-day operations.

Speech to Speech Service has been offered on trial bases by the DDTPAC through its contract with U.S. Sprint (Sprint), the current CRS provider. The service provides the equivalent of basic dial tone to people whose speech can not be readily understood over the telephone and whose motion disabilities preclude them from typing well enough to use a TDD. By this service, speech disabled persons place their own telephone calls by voice or speech synthesizer through operators, who repeat the words of the caller in real time to the party being called.

Resolution (Res.) T-15933, issued on July 3, 1996, approved MCI's Advice Letters 257 and 257A to appoint MCI the primary provider of CRS but denied the request for Speech to Speech Service to be provided under the CRS contract. MCI's Advice Letters had been

filed in response to the DDTPAC's recommendation for MCI to be awarded the CRS contract effective October 11, 1996 when the DDTPAC's contract with the current CRS provider expires. Res. T-15933 stated that the results of the second trial should be received and evaluated before Speech to Speech is authorized as a permanent feature of telephone service in California.

By letter to the Executive Director, dated August 26, 1996, the DDTPAC has provided the Commission preliminary results of the second Speech to Speech trial. In the letter, the DDTPAC stresses the need to avoid a loss of telephone access for users who now rely upon it. The DDTPAC requests, in particular, for permission to modify its CRS contract with MCI to be able to provide Speech to Speech as a permanent feature of CRS. The DDTPAC requests, further, that the authority be effective as soon as possible, so that MCI can begin its arrangements to offer the service. MCI has stated it will need 60 days from the effective date of Commission approval to begin providing the service.

On August 29, 1996, the DDTPAC sent the Executive Director a follow-up letter requesting permission to continue providing Speech to Speech through Sprint, until at least 60 days after Commission authority is granted for MCI to provide the service. The letter concludes, that, if the Commission does not grant authority for MCI to provide Speech to Speech Service, the DDTPAC will discontinue the Sprint trial. In making the request, the DDTPAC repeated its concern to avoid a gap in the provision of the service. The Executive Director's reply, dated September 11, 1996, approved extending the current Speech to Speech trial, under the same parameters as it is now provided, pending a Commission determination of this matter.

The DDTPAC continues to collect Speech to Speech data. Additional follow-up information was provided by letter dated September 10, 1996 to the Executive Director for the period through the end of August 1996.

### DISCUSSION

There are 100,000 to 200,000 Californians with speech disabilities. However, only a small percentage have moderate speech disabilities (as opposed to minor or severe speech disabilities) and are unable to access CRS by typing on a TDD. The conservative estimate is that there are between 2,000 to 10,000 potential users of Speech to Speech. Two Commission authorized trials have been conducted to examine the feasibility and demand for the service--the first for a thirty day period in November 1995 and the second for a four month period from June 10, 1996 to October 11, 1996.

#### The First Speech to Speech Trial

Early in 1995, the DDTPAC received the Commission's Executive Director's approval for Sprint to conduct a 30-day trial of Speech to Speech Service at a cost of \$49,000. Sprint

had first estimated the cost of the trial at \$60,000, but was able to later reduce the cost due to savings experienced by planning the California trial simultaneously with a trial in the State of Missouri.

The primary objective of the first trial was to determine the technical and operational feasibility of Speech to Speech on an ongoing basis. The trial was conducted from 1:00 p.m. to 5:00 p.m., Monday through Friday, November 1 through November 30, 1995. Nine agents were provided training in listening to and understanding the speech of various people with speech disabilities and in any call set-up or call handling procedures that were different from regular CRS procedures. Sprint established a separate 800 number for the participants to reach the specially-trained agents.

Highlights of the first trial results are:

- During the thirty day period, 599 inbound and 2,005 outbound calls were placed, resulting in 3.3 outbound calls per inbound call or double the regular CRS 1.5 outbound to inbound call average.
- The average talk time was 18 minutes, about three times the average talk time for traditional CRS calls. Talk time includes call set-up, the time during which the relay agent receives instructions from the caller and provides explanation and assistance to the called party. The call set up times were longer during the trial due to the need for clarification of spoken information.
- Twenty-five people with speech disabilities participated in the trial. Participants were selected through a recruitment and screening process.
- Participants agreed to initiate 10 calls per week and to arrange five calls per week, but actual usage was higher. Use of the service per participant increased each week.
- Participants reported that Speech to Speech Service gave them the ability to use the telephone independently for the first time in their lives.
- Both consumers and operators rated the Speech to Speech calls as "successful" on an overwhelming majority of evaluation forms. Consumers also reported that in the majority of cases, they would not have made the phone call without using Speech to Speech Service.

### The Second Speech to Speech Trial

At the conclusion of the November trial, the DDTPAC requested Commission permission to amend its CRS contract with Sprint to offer Speech to Speech as a permanent feature of the CRS. Sprint had quoted the DDTPAC a price of \$3.13 per minute to offer the service, which the DDTPAC calculated to approximate \$42,255 per month, based on an estimated 750 inbound calls per month and the first trial average of 18 minutes per call.

The Executive Director responded by letter dated April 12, 1996. The letter approved a second trial for a four month period beginning June 10, 1996 and ending October 11, 1996 but pointed out that the estimated cost of the four month trial was less than one percent of

the DDTPAC's 1996 annual budget. Consequently, the DDTPAC could implement the trial on its own after notifying the Commission. The Executive Director further expressed the expectation that, during the trial, data would be gathered on (1) the number of calls placed, (2) the number of customers (identified by telephone numbers) generating calls, (3) the time of day calls are placed, as well as the data typically collected concerning standard relay service and encouraged the DDTPAC's California Relay Service Advisory Committee (CRSAC) to ask Sprint for any other data that would be useful for evaluating the benefits of the service.

The primary focus of the second trial was to determine the demand for Speech to Speech. As a result, the second trial differed from the first in the following respects:

- The participants were not limited to a prescreened and selected group of users. Any person in California with a speech disability could use the service. Users were not required to make a certain number of calls per week, nor were they limited in the number of calls they could make.
- This trial was conducted 24-hours a day, 7 days a week, paralleling the hours of operation of regular CRS service.
- This trial was conducted for a longer period—18 weeks as opposed to 4 weeks.
- A total of 20 agents were trained and participated in call handling.

Preliminary results of the second trial are:

- Similar to regular CRS calls, most Speech to Speech calls are placed during the business day, from 7:00 AM to 7:00 PM and call volumes are higher during the week than on weekends and holidays.
- The number of users is increasing, as measured by the number of unduplicated originating Automatic Number Identifications (ANI) that have used the service since the beginning of the trial. (The number of originating ANIs is used to approximate the number of users because consumers are not required to identify themselves when they call. Some call from both their home and their work places, resulting in more than one ANI per user. Others share telephones, resulting in multiple users per ANI.)
- A total of 388 different ANIs used the service through August 1996, which with 5240 outbound calls equates to about 13.5 outbound calls per ANI.
- The average number of calls per user, over the course of each trial, has increased from 16.1 calls per user to 19.5 calls per user.
- The average talk time for the month of July decreased to 12 minutes in the second trial from 18 minutes in the first trial.

### The State of Missouri Trial

The only other experience with Speech to Speech in the country was a trial conducted by Sprint for the State of Missouri in October 1995. The trial was conducted from 7:00 a.m. to 9:00 p.m., seven days a week. Only 42 inbound calls and only 74 outbound calls were made. Of the 74 outbound calls, 50 were completed calls, the others being no answers and

busy signals. The average talk time was 12.78 minutes. The Missouri Public Service Commission considers its trial to have been unsuccessful and attributes the lack of success to poor constituent outreach.

### Comparisons with other Services

The DDTPAC acknowledges that demand for the service is a key component in evaluating the success of the trial and posits that demand will increase as more people learn about the service and gain experience using it. The DDTPAC points out that it offers other services through CRS which generate relatively low call volumes and serve a limited number of users and, consequently, demand should not be a major factor in the Commission's decision whether to authorize Speech to Speech to be a permanent CRS provision.

- Spanish Relay Service: Spanish CRS calls average around 50 to 55 calls per day (about .2% of total CRS calls), while the Speech to Speech call volumes during the second trial have averaged 62 per day (about .3% of total CRS calls). Trial results indicate that Speech to Speech use is higher than Spanish relay use, even though the speech disabled community is much smaller than the Spanish speaking community in California.
- Braille TDDs: The DDTP provides Braille TDDs and large visual display units to the deaf/blind community, another very small population. Evidence that this community is quite small is illustrated by the fact that at the end of 1995, the program had distributed only 125 of both of these units statewide. The DDTPAC points out that the Braille TDD is the most expensive piece of equipment that it provides, costing about \$6,500 per unit. In this respect, neither the small size of the community nor the cost to serve the community have been a barrier to offering the service.
- Three-Way Calling: Three-Way Calling is a network service offered by the local exchange companies that the DDTP has offered to speech and mobility disabled persons, since before Speech to Speech was developed. With Three-Way Calling, speech disabled consumers can add an individual onto a telephone call who can "voice for" or "interpret" the speech of the speech disabled caller to the called party. It is similar to Speech to Speech in that both permit subscribers to talk to two people in two different places at the same time. To date, fewer than 20 people statewide have requested this service through DDTP. However, the DDTPAC does not advocate eliminating Three-Way Calling as a DDTP service, because some consumers may prefer using an interpreter whom they personally select. The DDTPAC, nonetheless, points out that Three-Way Calling places the following burdens on persons with speech disabilities:
  - "Voicers" are generally friends or relatives who understand the speech of the person making the call. The speech disabled caller needs to know the voicer's

whereabouts and telephone number in order to add him/her onto the call. However, very likely, such voicers are not available 24 hours a day.

- The person assisting with the call may charge for his/her services, meaning that speech disabled callers would incur additional charges to make their telephone calls.
- Three way calling assumes that the speech disabled caller has access to an individual or individuals to perform this function.

### Projected Cost of MCI's Speech to Speech Service

Speech to Speech was a "mandatory-optional" item in the DDTPAC's Invitation for Bid (IFB) for a new CRS provider. All bidders to provide CRS were required to bid a separate monthly price to provide Speech to Speech, although the decision to purchase of Speech to Speech under the CRS contract was strictly at the DDTP's option. Bidders were told that, if accepted, the bid price would remain constant for the full duration of the contract. The DDTP's decision to purchase would be predominately based on the reasonableness of the bids and on the vendor's compliance with all other applicable IFB requirements. If the DDTP elected to purchase Speech to Speech, it would be from the compliant vendor placing the lowest bid.

Bids to provide regular CRS and Speech to Speech were received from MCI, Sprint and AT&T Communications. All three of the potential vendors were found to be compliant with the IFB. Their monthly bid prices and estimated call volumes to provide Speech to Speech were:

<u>Vendor</u>	<u>Monthly Price</u>	<u>Number of Annual Estimated Calls</u>
AT&T	\$ 8,102	38,500
MCI	45,000	42,000 - 48,000
Sprint	411,695	40,000

The DDTPAC has provided Commission staff with an analysis of the cost reasonableness of the bids, prepared by independent consultants, Hesse, Stobbe & Associates. In the opinion of the consultants "AT&T's price is too low (it is likely a mistake), MCI's is reasonable, and Sprint's is too high (either a mistake or a courtesy bid.)" The consultants summarize that MCI's bid provides a reasonable first year profit and return on investment, considering that the bid is a fixed amount and therefore contains risk. The consultants note that, if call volume is higher than forecast, costs will increase, without a corresponding increase in revenue. Furthermore, because monthly revenue is fixed, MCI has no profit incentive to promote Speech to Speech. The important implication is that promotion of the service under the current contract will have to be done by the DDTP or others.

Since submitting its bid, AT&T has withdrawn from the process, leaving MCI the lowest cost compliant bidder. Accordingly, the DDTPAC requests authority to purchase Speech to Speech from MCI at its \$45,000 per month bid price. The DDTPAC requests the authority for one year with the flexibility to adjust the rate and method of payment at the conclusion of the year, based on call volumes experienced. The DDTPAC points out that the MCI bid is very reasonable, compared to the \$3.13 per session minute rate that is currently being paid to Sprint. The DDTPAC also points out that, by its analysis, MCI's bid to provide Speech to Speech equates to \$.667 per session minute, which is less than its winning bid of \$.669 per conversation minute for regular CRS calls. (Payment on the basis of conversation minutes results in fewer minutes billed.)

### The American's with Disabilities Act

Title IV of the Americans with Disabilities Act (ADA) states that telecommunications relay services must be available "to the extent possible, and in the most efficient manner, to hearing-impaired and speech-impaired individuals in the United States." (Emphasis added.) The statute defines telecommunications relay services as:

Telephone transmission services that provide the ability for an individual who has a hearing impairment or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio. Such term includes services that enable two-way communication between an individual who uses a TDD or other nonvoice terminal device and an individual who does not use such a device. (Emphasis added.)

It is clear, that ADA applies to people with speech disabilities and, as such, their communication services must be functionally equivalent to those facilitating voice communication. The legislation only mentions TDDs, but it directs the establishment of state and local government regulations that "encourage ... the use of existing technology and do not discourage or impair the development of improved technology." Arguably, ADA encourages new methods of access to telecommunications services for disabled individuals and it does not support low level, one-size-fits-all solutions. The conceptualization of Speech to Speech Service came after ADA, but by this analysis, Speech to Speech is the type of "improved technology" that the ADA envisioned and would support.

The ADA was enacted by Congress in 1990, well after the California Legislature established Public Utilities Code 2881 in 1982 and the Commission created the CRS by Decision 86-02-042 in 1986. Although the CRS predates ADA, the DDTP and the

Commission have endeavored that the CRS should meet or exceed minimum ADA and Federal Communications Commission (FCC) requirements. The following are examples of features in the CRS contract that exceed FCC mandatory minimum standards:

- Speed of Answer - The CRS contract requires an average daily answer time of 7 seconds. The FCC minimum standards require that 85% of all calls are answered within 10 seconds.
- Intercept Messages - The CRS contract requires the vendor to provide voice and TDD intercept messages if a system failure occurs within the relay switch or on outbound circuits. The FCC minimum standards do not require intercept messages.
- Toll Discounts - The CRS contract requires discounts on intrastate long distance and toll calls to compensate for longer call lengths of TDD calls. The FCC minimum standards require no discounts.
- Spanish-Speaking Operators - The CRS contract requires that operators fluent in Spanish must be available at all times to relay calls in Spanish. The FCC minimum standards do not require Spanish-speaking operators.

#### Staff Analysis and Recommendation

Speech to Speech seems to be an example of improved technology for disabled persons that was envisioned by the ADA. It provides basic access to people who otherwise would not be able to make a telephone call, independently. Indications from the two California trials are that the service is technically and operationally feasible and that there are consumers for service. The limited size of the market should not be greatly relevant because, as the DDTPAC points out, other CRS services serve similarly low number of users.

Staff supports the DDTPAC's request to offer Speech to Speech, but recognizes that it is a new concept—not offered anywhere else in the country. In general, staff is concerned that it not be institutionalized in California without comprehensive analysis. More specifically, staff questions the service standards, the program outreach, the sustainability of call volumes, the pricing efficiency and the suitability of technical alternatives. To that end, staff offers the following analysis and recommendations:

- Quality of Service : The Commission received numerous complaints about the quality of service provided during the second trial. The complaints centered on vendor deficiencies, such as inadequate agent training, lack of open lines and long answer times. Staff recommends that the DDTPAC be granted provisional authority to purchase Speech to Speech from MCI for one year because the results of the second trial are compromised to the extent poor service discouraged any consumer from using the service. Ordering Paragraph #7 in Res. T-15828 (DDTP 1996 Annual Budget) states the Commission's expectation that the DDTPAC will establish "standards for measuring and monitoring the quality of services provided by the program." Staff recognizes that Speech to Speech is a new service, but believes there is enough



information now for rigorous service standards to be applied. Before the provisional period begins, the DDTPAC should delineate steps that ensure consistent high quality of service for Speech to Speech consumers. Staff recommends that the DDTPAC be directed to provide mid-year and end-of-year reports on the level of MCI's compliance with clear and enforced Speech to Speech Service standards. Staff also recommends that any request for a permanent offering of Speech to Speech should include rigorous service standards.

- Sustainability of Demand and Pricing Efficiency: Good measures of demand through the number of users and call volumes are needed to determine the appropriate budget, should there be a permanent offering of Speech to Speech. During the provisional one year period, MCI should track and bill Speech to Speech calls on a monthly basis, separate from regular CRS billings. Staff recommends that the Commission adopt the DDTPAC's request to adjust the rate and method of payment at the conclusion of the year, based on call volumes experienced. Staff recommends, further, that the DDTPAC explore and advise the Commission on the feasibility of Speech to Speech vendors eventually being compensated on a usage based rate structure, rather than by the current fixed monthly payment.
- Program Outreach: A dedicated outreach effort is critical for Speech to Speech to be effective, because the service is specifically designed to provide access to people with little or no prior experience using the telephone network. Moreover, the DDTPAC consultants, Hesse, Stobbe & Associates had the important observation that, under the terms of the current CRS contract, the vendor of Speech to Speech has a disincentive to promote the service. Revenue to provide Speech to Speech Service is a fixed monthly amount, but costs to provide the service will increase if call volumes increase, thereby reducing profit. Staff recommends, therefore, that the DDTPAC prepare a proposal to provide Speech to Speech outreach as a program area within its administrative structure. The DDTP's proposal should include a budget and job specification(s) of appropriately qualified outreach staff. A complete outreach proposal should be provided to the Commission for review and approval no later than thirty days after the DDTP signs the contract with MCI to provide Speech to Speech. The Speech to Speech outreach program should be operable when provision of the service commences.
- Technical Alternatives: Speech to Speech has promising prospects. It is conceivable, however, that the intended access can be satisfied by alternative, less costly, high quality speech output communication systems. Staff recommends that the DDTP explore new and evolving technologies serving speech disabled people and determine their suitability and cost effectiveness, on a going forward basis. Staff recommends that this analysis be provided to the Commission as part of the DDTP's request to provide Speech to Speech as a permanent service.

Deaf and Disabled Telecommunications Program to purchase  
Speech to Speech Service from MCI/prw

## FINDINGS

1. The CRS is not accessible to people with speech disabilities who cannot type on a TDD. Speech to Speech Service provides basic access to the California telephone network for this portion of the speech disabled population.
2. The DDTPAC and MCI have requested permission to offer Speech to Speech Service as a permanent feature of CRS.
3. The conservative estimate is that there are between 2,000 to 10,000 potential users of Speech to Speech.
4. Two trials of Speech to Speech Service have been conducted, one in November 1995 and the second for a four month period that concluded October 11, 1996. Preliminary analysis is that the service is technically and operationally feasible and there is a demand for the service.
5. The only other experience with Speech to Speech in the country was a trial conducted for the State of Missouri in October 1995. The Missouri Public Service considers its trial to have been unsuccessful and attributes the lack of success to poor constituent outreach.
6. Some of the services now offered through CRS generate relatively low call volumes and serve a limited number of users.
7. MCI's price to provide Speech to Speech is the lowest available through an open and competitive bidding process.
8. Title IV of the Americans With Disabilities Act (ADA) applies to speech disabled persons. The conceptualization of Speech to Speech Service came after ADA, but it is the type of improved technology that the legislation envisioned and would support.
9. Although CRS predates ADA, the DDTP and the Commission have endeavored that the CRS should meet or exceed minimum ADA and Federal Communications Commission (FCC) requirements.
10. Staff supports the DDTPAC's request to offer Speech to Speech, but recognizes that it is a new concept--not offered anywhere else in the country. Staff is concerned that it not be institutionalized in California without comprehensive analysis. More specifically, staff questions the service standards, the program outreach, the sustainability of call volumes, the pricing efficiency and the suitability of technical alternatives.
11. The Commission received numerous complaints about the quality of service during the second trial. A full evaluation of the second trial results has not occurred, however, the results may have been compromised by the poor quality of service provided during the trial.
12. Ordering Paragraph #7 in Res. T-15828 (DDTP 1996 Annual Budget) states the Commission's expectation that the DDTPAC will establish "standards for measuring and monitoring the quality of services provided by the program." Speech to Speech is a new service, but there is enough information now for rigorous service standards to be applied.

13. Good measures of demand through the number of users and call volumes are needed to determine the appropriate budget, should there be a permanent offering of Speech to Speech.
14. A dedicated outreach effort is critical for Speech to Speech to be effective, because the service is specifically designed to provide access to people with little or no prior experience using the telephone network.
15. Under the terms of the current CRS contract, there is a disincentive to promote the service.
16. Speech to Speech Service has promising prospects. It is conceivable, however, that the intended access can be satisfied by alternative, less costly, high quality speech output communications systems.

**THEREFORE, IT IS ORDERED that:**

1. The Deaf and Disabled Telecommunications Program Administrative Committee (DDTPAC) and MCI Communications (MCI) are granted provisional authority to modify their California Relay Service (CRS) contract to provide Speech to Speech at MCI's bid price.
2. The provisional authority shall be for one year commencing with the date MCI can begin offering the service.
3. MCI shall notify customers that it will provide Speech to Speech on a provisional one year basis under this Order and that a permanent offering of Speech to Speech Service is subject to the Commission's determination that the experiment was successful. The notice shall be in the form of a CRS bill insert to all subscribers sent approximately one month before Speech to Speech Service is operational. Individual notice shall be provided during this year to all new subscribers to CRS.
4. During this provisional year, MCI shall track and bill Speech to Speech calls on a monthly basis, separate from regular CRS billings.
5. Before the provisional period begins, the DDTPAC shall delineate steps that it will take to ensure that Speech to Speech consumers will receive consistently high quality of service. The DDTPAC shall provide the Commission with mid-year and end-of-year reports on the level of MCI's compliance with clear and enforced Speech to Speech Service standards. Any request for a permanent offering of Speech to Speech shall include rigorous service standards.
6. The DDTPAC shall prepare a proposal to provide Speech to Speech outreach as a program area within its administrative structure. A complete proposal including budget and job specification(s) of appropriately qualified outreach staff shall be provided to the Commission for review and approval, no later than thirty days after the CRS contract is modified to provide Speech to Speech. The Speech to Speech outreach program shall be operable when provision of the service commences.

Deaf and Disabled Telecommunications Program to purchase  
Speech to Speech Service from MCI/prw

7. The DDTP shall present its proposal for a permanent offering of Speech to Speech Service to the Commission no later than ninety days before the end of the MCI provisional service year.
8. The DDTPAC shall consider adjusting the rate and method of payment based on call volumes experienced during the provisional year of service. The DDTPAC shall also explore and advise the Commission on the feasibility of Speech to Speech being compensated on a usage based rate structure, rather than the current fixed monthly payment structure. A cost analysis shall be included in the DDTPAC's request for permanent provision of Speech to Speech Service.
9. The DDTPAC shall explore new and evolving technologies for serving speech disabled persons and shall determine their suitability and cost effectiveness on a going forward basis. This analysis shall be provided to the Commission as part of the DDTPAC's request to provide Speech to Speech on a permanent basis.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on October 25, 1996. The following Commissioners approved it:

  
WESLEY M. FRANKLIN  
Executive Director

P. GREGORY CONLON  
President  
JESSIE J. KNIGHT, Jr.  
HENRY M. DUQUE  
JOSIAH L. NEEPER  
Commissioners

DANIEL Wm. FESSLER, being  
necessarily absent, did not participate.