

WARREN ANTHONY FITCH
ATTORNEY-AT-LAW

SWIDLER
&
BERLIN
CHARTERED

TC98-127

DIRECT DIAL
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July 2, 1998

VIA FEDERAL EXPRESS

William Bullard
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol
State Capitol Building
Pierre, SD 57501

RECEIVED

JUL 06 1998

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

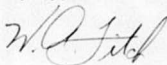
Re: *Complaint of Tel-Save, Inc.*

Dear Mr. Bullard:

Enclosed for filing are an original and one (1) copy of the Complaint of Tel-Save, Inc. against U.S. West, Inc. and Request for Relief.

Please date-stamp the enclosed extra copy of this filing and return it in the self-addressed, postage paid envelope provided. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Very truly yours,



Warren Anthony Fitch
Marcy Greene

Counsel for Tel-Save, Inc.

Enclosures
cc: Tel-Save, Inc.

TC 98-127
RECEIVED

JUL 06 1998

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

Complaint and Request for Relief of)
Tel-Save, Inc. Against U.S. West, Inc.)
for Violation of Sections 201(b) and 202 of) Docket No. _____
the Communications Act of 1934, as amended, and)
Violation of S.D. Codified Laws Section 49-31-11)

COMPLAINT AND REQUEST FOR RELIEF OF
TEL-SAVE, INC.

Andrew D. Lipman
Warren Anthony Fitch
Marcy Greene
Swidler & Berlin, Chartered
3000 K Street, NW, Suite 300
Washington, D.C. 20007
(202) 424-7500
Fax (202) 424-7643

Counsel for Tel-Save, Inc.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

Complaint and Request for Relief of)
Tel-Save, Inc. Against U.S. West, Inc.)
for Violation of Sections 201(b) and 202 of) Docket No. _____
the Communications Act of 1934, as amended, and)
Violation of S.D. Codified Laws Section 49-31-11)

COMPLAINT AND REQUEST FOR RELIEF OF
TEL-SAVE, INC.

Tel-Save, Inc. ("TSI"), through undersigned counsel, files this complaint against U.S. West, Inc. ("U.S. West") for violation of Sections 201(b) and 202 of the Communications Act of 1934 as amended, and violation of S.D. Codified Laws §49-31-11.

JURISDICTION

1. The Commission has jurisdiction of, and authority to grant the relief requested, in this proceeding pursuant to S.D. Codified Laws §§49-13-1 and 49-31-3, and 47 U.S.C. Sections 201 and 202.

FACTUAL ALLEGATIONS

2. TSI is a Pennsylvania corporation with principal offices located at 6805 Route 202, New Hope, Pennsylvania, 18938. TSI is a wholly-owned subsidiary of Tel-Save Holdings, Inc., a Delaware corporation. TSI is a nondominant telecommunications carrier authorized to provide resold interexchange telecommunications services in 49 states. In South Dakota, TSI provides such telecommunications services. TSI also provides interstate and international telecommunications services as a nondominant common carrier, pursuant to authorization from the Federal Communications Commission ("FCC").

3. U.S. West is an incumbent local exchange carrier ("ILEC") in the State of South Dakota.

4. TSI is an industry leader in offering its customers affordable long distance rates. The ability to offer such favorable rates is a direct product of competition in the long distance telecommunications market arising in part from the Telecommunications Act of 1996. However, U.S. West effectively denies South Dakota consumers one of the most important benefits of increased competition -- *i.e.*, the low rates offered by TSI -- because it has refused to provide customers with a convenient means by which to switch their service to that provided by TSI.

5. Specifically, U.S. West does not permit end-user customers to lift PIC freezes by means of e-mail, whether transmitted directly by the customer or forwarded by TSI.¹ U.S. West's failure to accept e-mailed requests to lift PIC freezes unreasonably and unnecessarily delays, impedes, and often thwarts customer attempts to lift PIC freezes in order to switch their long distance service to that provided by TSI.

6. TSI currently receives PIC change requests from end-user customers and submits those requests to U.S. West electronically. If a customer has a PIC freeze on an account, TSI will receive a code from U.S. West indicating that the PIC request cannot be processed.

7. Upon being thus notified that a customer's account is subject to a PIC freeze, TSI presently has no alternative, under current U.S. West policy, except to contact the customer and either attempt to arrange a three-way conference call with U.S. West or have the customer personally attempt

¹ "PIC" is the abbreviation for "primary interexchange carrier." The term "PIC change request" refers to an order placed by end-user customers with an interexchange carrier ("IXC") to switch their PIC from their current provider to the chosen IXC. That order is then forwarded (usually electronically) to the LEC for processing. PIC change requests can also be submitted directly by the end-user customer to the LEC. A "PIC freeze" is a restriction placed by the LEC on an end-user customer's account which is supposed to prohibit the processing of a PIC change request without some form of express authorization from the end-user customer. (The term "PIC freeze," it may be noted, is something of a misnomer, as the restriction can also be applied to intraLATA toll and local exchange services.)

to contact U.S. West, during normal business hours, in order to have the PIC freeze lifted. U.S. West will not accept, directly from customers or forwarded by TSI, e-mail requests that U.S. West lift a PIC freeze, regardless of whether such requests would be e-mailed directly by the customer or forwarded by TSI. The arbitrariness of U.S. West's PIC-freeze lift procedures is underscored by the fact that U.S. West will not accept any form of written request to lift a PIC freeze even though it solicits its customers to place PIC freezes on their account by written notification.

8. U.S. West's refusal to accept e-mailed PIC-freeze lift requests is tantamount to refusing to communicate with the end-user customers and to locking them in to their current PIC. U.S. West's policy not only subjects such customers to a needlessly inconvenient hassle but also, in many instances, results in these customers being unable to effect their PIC preference.

9. E-mail would provide the most convenient, most reliable, and -- in many instances -- the only means of lifting their PIC freeze and switching to their preferred carrier. E-mail, which is used more than 68,000,000 times every day and thus has become a standard method of communication, and offers a simple, convenient, efficient, inexpensive and reliable method of submitting requests to lift PIC freezes. There is no reason not to accept and process e-mailed PIC-freeze lift requests. Indeed, since written letters of authorization are the preferred method for changing carriers, the only purpose which U.S. West can have for its current policy of not accepting written requests to lift PIC freezes is to forestall and undermine competition in the telecommunications market. Such an anti-competitive policy directly harms not only U.S. West's present and future competitors but also the telecommunications consumers of this State. TSI is harmed by the unnecessary delay in bringing customers onto its service, the loss of some customers due to the inability to lift a PIC freeze without undue burden and effort on the part of the customer, and the extra unnecessary resources expended

attempting, with customers, to lift PIC freezes by U.S. West's restrictive methods.

10. U.S. West's above-described actions violate Sections 201(b) and 202 of the Communications Act of 1934 as amended, and S.D. Codified Laws §49-31-11.

11. Section 201(b) of the Communications Act of 1934, as amended, requires that "[a]ll charges, practices, classifications, and regulations for and in connection with such communications service, shall be just and reasonable, and any such charge, practice, classification, or regulation that is unjust or unreasonable is hereby declared to be unlawful. 47 U.S.C. §201(b). U.S. West's practices are not just and reasonable in that they disallow the use of e-mailed requests, which are an acceptable means of direct communications.

12. Section 202 of the Communications Act of 1934, as amended, prohibits common carriers from engaging in unreasonable or unjust discrimination, as does S.D. Codified Laws §49-31-11. By refusing to allow the use of e-mail to lift PIC freezes, U.S. West clearly prejudices TSI's ability to bring customers onto its service in accordance with those customers' requests to do so. With respect to intraLATA toll services, U.S. West clearly seeks to protect its own market share and hinder the onset of real competition for the intraLATA toll market. In short, U.S. West's narrow and uncompromising approach to lifting PIC freezes is an anticompetitive customer retention program masquerading as an anti-slamming initiative. It is in U.S. West's interest not to accept PIC requests via e-mail in order to forestall customer subscription to TSI, which is introducing affordable rates to South Dakota consumers in direct competition with U.S. West.

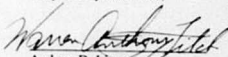
13. TSI recognizes that PIC freezes are one means by which consumers can protect themselves against slamming. At the same time, the FCC and numerous other state Commissions have recognized that PIC freezes can be used improperly as anti-competitive tools by incumbent LECs. (See,

i.e., Order Granting in Part and Denying in Part Petition for Reconsideration, Cases 28425, 92-C-0665, 95-C-0154, 95-C-0650, 96-C-1041 (NY PSC, Dec. 15, 1997); *In the Matter of Implementation of the Subscriber Carrier Selection Changes Provision of the Telecommunications Act of 1996 and Policies and Rule Concerning Unauthorized Changes of Consumers' Long Distance Carriers*, Further Notice of Proposed Rule Making and Memorandum Opinion and Order on Reconsideration, CC Docket No. 94-129 (rel. Jul. 15, 1997); *In the Matter of the Complaint of MCI Telecommunications Corporation Against Ameritech Michigan*, Opinion and Order, Case No. U-11550 (MI PSC, May 11, 1998). Such abuse can be avoided by the simple expedient of ordering U.S. West to accept and honor e-mailed requests to lift PIC freezes.

REQUESTED RELIEF

For the reasons stated above, TSI respectfully requests that the Commission enter an order directing U.S. West to cease and desist from imposing unreasonable requirements on lifting of customer PIC freezes, requiring that U.S. West accept e-mailed requests to lift PIC freezes, both directly from end-user customers and as forwarded by TSI; and providing such other and further relief as the Commission deems necessary and appropriate.

Respectfully submitted,



Andrew D. Lipman
Warren Anthony Fitch
Marcy Greene
Swidler & Berlin, Chartered
3000 K Street, NW, Suite 300
Washington, D.C. 20007
(202) 424-7500
Fax (202) 424-7643

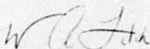
Counsel for Tel-Save, Inc.

Dated: July 2, 1998

CERTIFICATE OF SERVICE

I, Warren Anthony Fitch, hereby certify that on this 2nd day of July, 1998, true and accurate copies of the foregoing **Complaint and Request for Relief of Tel-Save, Inc. Against U.S. West, Inc. for Violation of Sections 201(b) and 202 of the Communications Act of 1934, as amended, and Violation of S.D. Codified Laws Section 49-31-11** were served by overnight delivery to the following:

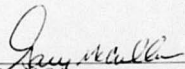
Larry Brotherson
Senior Attorney
U.S. West, Inc.
1801 California Street, 51st Floor
Denver, CO 80202



Warren Anthony Fitch

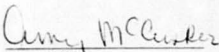
VERIFICATION

I, Gary McCulla, hereby declare under penalty of perjury, that I am President of Tel-Save, Inc., that I am authorized to make this verification on Tel-Save Inc.'s behalf; that I have read the foregoing Complaint and exhibits; and that the facts stated therein are true and correct to the best of my knowledge, information and belief.



Gary McCulla
President

Subscribed and sworn to before me this 18 day of June, 1998.



Notary Public

My Commission expires: _____

NOTARIAL SEAL
AMY McCUSKER, Notary Public
City of Philadelphia, Phila. County
My Commission Expires April 27, 2000

F A X TRANSMISSION from Consumer Affairs

To: Colleen Sevoid

Company: U S WEST

Fax Number: 8-605-339-5390

Date: 7/6/98

Time: 11:17:46

From: Leni Healy

Company: South Dakota PUC

Fax Number: 605 773 3809

Pages including cover page: 12

Message:

Colleen,

The following are a copy of the South Dakota antislammng law and the complaint as sent by Tel-Save inc.

THIS COMMUNICATION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any distribution, use or copying of this communication is prohibited.

South Dakota Public Utilities Commission

State Capitol Building; Pierre SD 57501

Telephone: (605) 773-3201 Fax: (605) 773-3809

AN ACT

ENTITLED, An Act to revise the procedures to confirm a change of designated telecommunications companies.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF SOUTH DAKOTA:

Section 1. That § 37-30A-9 be amended to read as follows:

37-30A-9. Notwithstanding the provisions of § 37-30A-8, no person may change the designated telecommunications company as defined in § 49-31-1(9) which is providing service to a consumer without the written confirmation in the form of a letter of agency from that consumer or confirmation by a third-party verification company. The third-party verification company shall meet each of the following criteria:

- (1) Be independent of the telecommunications company that seeks to provide the consumer's new service;
- (2) Not be directly managed, controlled, or directed, or owned wholly or in part, by the telecommunications company that seeks to provide the consumer's new service;
- (3) Operate from facilities physically separate from those of the telecommunications company that seeks to provide the consumer's new service; and
- (4) Not derive commissions or compensation based upon the number of sales confirmed.

The telecommunications company that seeks to provide the consumer's new service shall connect the consumer by telephone to the third-party verification company or shall arrange for the third-party verification company to call the consumer to confirm the change. The third-party verification company shall obtain the consumer's oral confirmation regarding the change and shall record that confirmation. The record shall include the information requested by the third-party verification company and the consumer's responses. The third-party verification company shall retain that record for twelve months. The record shall be available to the Public Utilities Commission and to the

consumer at no cost. No information obtained from the consumer may be used for marketing purposes. If the telecommunications company or a third-party verification company acting on its behalf fails to comply with these third-party verification provisions, the Public Utilities Commission may revoke the telecommunication company's certificate of authority and may impose a civil fine of not less than two hundred dollars nor more than one thousand dollars for each offense. It is a violation of this Act for any person to make such an unauthorized change.

F A X TRANSMISSION from Consumer Affairs

To : Warren Fitch & Marcy Greene

Company :

Fax Number : 8-1-202-424-7643

Date : 7/6/98

Time : 2:36:26

From : Leni Healy

Company : South Dakota PUC

Fax Number : 605.773.3809

Pages including cover page : 3

Message:

We have received your request for action against U S West Communications on behalf of Tel-Save, Inc.

The following is a copy of the South Dakota antislammng law which may be helpful in this matter.

Commission policy allows a 48-hour period in which the parties may attempt to reach an informal resolution before the issue becomes a docketed matter. If this Commission is not notified of such a resolution before 5 PM Central time on July 8, 1998, the issue will become docketed and scheduled for a probable cause determination.

If there are any questions, please do not hesitate to contact us.

THIS COMMUNICATION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any distribution, use or copying of this communication is prohibited.

South Dakota Public Utilities Commission

State Capitol Building; Pierre SD 57501

Telephone: (605) 773-3201 Fax: (605) 773-3809

TELECOMMUNICATIONS SERVICE FILINGS

These are the telecommunications service filings that the Commission has received for the period of:

07/03/98 through 07/09/98

If you need a complete copy of a filing faxed, overnight expressed, or mailed to you, please contact Delaine Kolbo within five days of this filing.

South Dakota
Public Utilities Commission
State Capitol 500 E. Capitol
Pierre, SD 57501-5070
Phone: (605) 773-3705
Fax: (605) 773-3809

DOCKET NUMBER	TITLE/STAFF/SYNOPSIS	DATE FILED	INTERVENTION DEADLINE
REQUEST FOR CERTIFICATE OF AUTHORITY			
TC98-126	Application by Network Services, Inc. for a Certificate of Authority to operate as a telecommunications company within the state of South Dakota. (Staff: TS/CH) "The Applicant proposes to offer 1+ and 101XXXX direct dialing, 800/888 inbound toll-free, and travel card service through the resale of telephone services provided by facilities-based interexchange carriers."	07/06/98	07/24/98
FORMAL COMPLAINT FILED			
TC98-127	In the Matter of the Complaint filed by Tel-Save, Inc. against U S WEST Communications, Inc. regarding Violation of Sections 201(b) and 202 of the Communications Act of 1934, as amended, and Violation of S.D. Codified Laws Section 49-31-11. (Staff: HB/KC) Tel-Save requests that the Commission order U S WEST to cease and desist from imposing unreasonable requirements on lifting of customer PIC freezes, requiring that U S WEST accept e-mailed requests to lift PIC freezes, both directly from end-user customers and as forwarded by TSI; and providing such other and further relief as the Commission deems necessary and appropriate.	07/06/98	
TC98-128	Paul Malsom vs U S WEST Communications. "My complaint is toward U S WEST Communications. I am no longer a customer of U S WEST. My telephone service is with McLeodUSA. The problem is McLeodUSA just rents the telephone line from U S WEST. U S WEST does all of the repairs and service work on the lines and switch boards. My problems have been occurring for approximately ten years. My phone is out of service quite often. I lose my service almost once a month. Moisture seems to be the biggest problem. When the phone is out, it usually is two days before service is restored. Recently my phone will ring once, then stop. When you pick up the phone, nobody is there. This occurs sometimes often during the day or night. My phone almost always has some static in the background. I am an internet customer also. When the static is high, I cannot connect. Also the static disconnects me quite often. As a farmer, the internet is very important to my business. I use the internet to keep track of markets and weather conditions. I am also concerned about what would happen in case of a farm accident or an emergency. We live 25 miles from the nearest hospital. If our phone is out, we have no way to contact emergency help. Usually when our phone is out, the neighbors' is also out of service. From what I understand, my phone system is outdated. The lines' insulation is also brittle and weathered. The system that I have is not capable of caller ID. I feel if other customers in our area can get that option, I should also be able to." The complainant requested the following relief: "I think U S WEST should update our phone system. Whatever it takes to solve our phone problems and make it more reliable. Possibly new lines and new switching systems. We are still on an old party line type system." (Staff: LH/EM)	07/07/98	

You may receive this listing and other PUC publications via our website or via internet e-mail. You may subscribe to the PUC mailing list at <http://www.state.sd.us/state/executive/puc/puc.htm>

MARCY A. GREENE
ATTORNEY-AT-LAW

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&
BERLIN
CHARTERED

DIRECT DIAL
(202)424-7856
MAGREENE@SWIDLAW.COM

July 22, 1998

Via Facsimile and Overnight Delivery

William Bullard, Executive Director
South Dakota Public Utilities Commission
550 E. Capitol
State Capitol Building
Pierre, SD 57501

FAX Received JUL 23 1998

RECEIVED
JUL 23 1998
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Re: Complaint of Tel-Save, Inc. against U S WEST, Inc. - Docket No. TC 98-127

Dear Mr. Bullard:

This letter is submitted to respectfully request that the Commission hold the above-referenced complaint in abeyance until August 10, 1998, when the parties will provide to the Commission an update regarding the status of the proceedings. Tel-Save and U S WEST have initiated discussions with regard to the issues raised in the complaint, together with similar complaints filed in other jurisdictions. Accordingly, holding the complaint in abeyance during the pendency of these discussions prior to any further scheduling of other proceedings in this case, will conserve the Commission's and parties' time and resources, without prejudice to any interested party. Both parties reserve the right to request that the proceedings recommence if, during the course of the discussions, it becomes apparent that no agreement can be reached. Tel-Save is authorized to advise the Commission that U S WEST concurs in this request.

Please date-stamp the enclosed extra copy of this letter and return it in the envelope provided. Should you have any questions regarding this request, please do not hesitate to contact Marcy Greene at (202) 424-7856.

Respectfully submitted,



Warren Anthony Fitch
Marcy Greene

Counsel for Tel-Save, Inc.

cc: Karen Kramer (SD PUC)
Harlan Best (SD PUC)
Tel-Save, Inc.
Lisa Anderl (U S WEST)
Jim Gallagos (U S West)

August 7, 1998

Via Facsimile and Overnight Delivery

William Bullard, Executive Director
South Dakota Public Utilities Commission
550 E. Capitol
State Capitol Building
Pierre, SD 57501

RECEIVED
AUG 10 1998
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

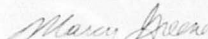
Re: Status Report - Docket No. TC 98-127

Dear Mr. Bullard:

On July 22, 1998, Tel-Save, Inc. ("TSI"), with the consent of US WEST, respectfully requested that the Commission hold the above-referenced matter in abeyance while the parties engaged in discussions in an effort to resolve to the issues raised in the complaint, and promised to provide a status report by August 10, 1998. TSI and US WEST have engaged in a number of discussions in the interim, and at this time believe that they will not be able in the immediate future to reach an agreement that would fully resolve this matter, despite the good faith efforts of both parties. Thus, although the parties will continue their discussions, TSI respectfully requests that the Commission recommence the proceedings at this time. Both parties have agreed not to contest requests for an enlargement of time for any filings due within the immediate future, if meeting such a deadline would be a hardship due to the proceedings previously being held in abeyance.

Please date-stamp the enclosed extra copy of this letter and return it in the envelope provided. Should you have any questions regarding this request, please do not hesitate to contact Marcy Greene at (202) 424-7856.

Respectfully submitted,



Warren Anthony Fitch
Marcy Greene

Counsel for Tel-Save, Inc.

cc: Karen Kramer (SD PUC)
Harlan Best (SD PUC)
Lisa Anderl (U S WEST)
Jim Gallagos (U S WEST)
Tel-Save, Inc.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE COMPLAINT)	ORDER DISMISSING
FILED BY TEL-SAVE, INC. AGAINST U S)	COMPLAINT AND CLOSING
WEST COMMUNICATIONS, INC.)	DOCKET
REGARDING VIOLATION OF SECTIONS)	
201(b) AND 202 OF THE)	TC98-127
COMMUNICATIONS ACT OF 1934, AS)	
AMENDED, AND VIOLATION OF SDCL 49-)	
31-11)	

On July 6, 1998, the Public Utilities Commission (Commission) received a complaint from Tel-Save, Inc. (TSI) against U S WEST Communications, Inc. (U S WEST) regarding a violation of Sections 201(b) and 202 of the Communications Act of 1934, as amended, and a violation of SDCL 49-31-11. TSI requests that the Commission order U S WEST to cease and desist from imposing unreasonable requirements on lifting of customer PIC freezes, requiring that U S WEST accept e-mailed requests to lift PIC freezes, both directly from end-user customers and as forwarded by TSI; and providing such other and further relief as the Commission deems necessary and appropriate.

Pursuant to ARSD 20:10:01.08 01 and 20:10:01.09, if a complaint cannot be settled without formal action, the Commission shall determine if the complaint shows probable cause of an unlawful or unreasonable act, rate, practice or omission to go forward with the complaint.

On July 23, 1998, at its duly noticed meeting, the Commission deferred the complaint at the parties' request as the parties had entered into discussions with regard to the issues raised in the complaint. At its regularly scheduled meeting of August 18, 1998, the Commission again considered the matter. U S WEST stated that at this time it does not provide subscribers their choice of an intralATA presubscribed carrier.

The Commission has jurisdiction over this matter pursuant to SDCL 49-13-1, 49-13-4, 49-31-7, 49-31-7.1, and ARSD 20:10:01.07 01 and 20:10:01.08 01. Since there is no intralATA presubscription in U S WEST's local exchange areas at this time, the Commission unanimously voted to dismiss the complaint and to close the docket. It is therefore

ORDERED, that this complaint be dismissed and the docket closed.

Dated at Pierre, South Dakota, this 25th day of August, 1998.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.

By: William K. Laska

Date: 8/25/98

(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION

James A. Burg
JAMES A. BURG, Chairman

Pam Nelson
PAM NELSON, Commissioner

Laska Schoenfelder
LASKA SCHOENFELDER, Commissioner