

Clearinghouse Rule 95-014

STATE OF WISCONSIN)
)
DEPARTMENT OF AGRICULTURE,) ss.
)
TRADE AND CONSUMER PROTECTION)


Docket No. 94-R-11

CERTIFICATION:

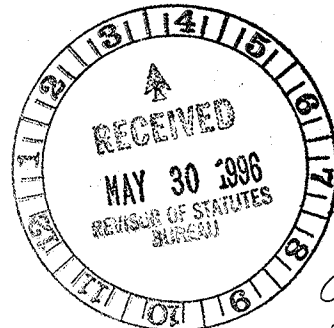
I, Alan T. Tracy, Secretary, State of Wisconsin, Department of Agriculture, Trade and Consumer Protection, and custodian of the official records of said Department, do hereby certify that the annexed order creating chapter ATCP 123, Wisconsin Administrative Code, relating to telecommunications and cable television service was duly approved and adopted by the Department on January 30, 1996.

I further certify that said copy has been compared by me with the original on file in the Department and that the same is a true copy thereof, and of the whole of such original.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the official seal of the Department at the Department offices in the city of Madison, this 23rd day of May, 1996.



Alan T. Tracy
Secretary



95-014
7-1-97

ORDER OF THE STATE OF WISCONSIN
DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION
ADOPTING RULES



1 The state of Wisconsin department of agriculture, trade and
2 consumer protection adopts the following order to create chapter
3 ATCP 123, Wis. Adm. Code, related to telecommunications services
4 and cable television services.

Analysis by the Department of
Agriculture, Trade and Consumer Protection

Statutory authority: ss. 100.20(2) and 100.207(6)(e), Stats.

Statutes interpreted: ss. 93.01(1)(m), 100.20 and 100.207,
Stats.

Coverage

This rule regulates subscription and billing practices related to telecommunications and cable television services provided to consumers for personal, family or household purposes.

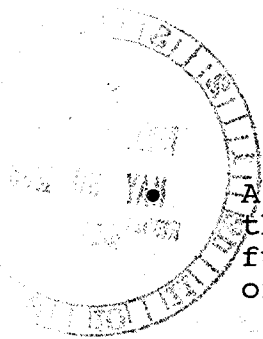
This rule does not apply to the following activities of telecommunications providers:

- Activities which are specifically authorized under ss. 196.194(1), 196.207, 196.20, or 196.499(4), Stats.
- Activities which the Wisconsin public service commission specifically authorizes by rule or order.
- Subscription changes which a provider implements by tariff under ch. 196, Stats., other than by a tariff change under s. 196.196(3) or 196.499(2), Stats.

This rule does not authorize any activity prohibited by ch. 196, Stats., or by the Wisconsin public service commission under ch. 196, Stats.

Disclosure to Subscribers

Under this rule, a provider of telecommunications or cable television services must disclose subscription terms to a consumer at or before the time that the consumer subscribes. The disclosure must include all of the following:



A clear identification of each service offering included in the subscription, including material consumer features, functions or capabilities which comprise that service offering.

- The price which the consumer must pay for each service offering. Prices may be disclosed as price schedules, rates or formulas, provided that a consumer can readily determine the total amount which he or she must pay.
- All incidental charges that may affect the total amount payable by the consumer, including charges for connecting, changing or disconnecting service. (The provider may disclose any finance or late payment charges when the provider bills the consumer for the principal amount to which those charges may apply.)
- The effective date of the subscription.
- The expiration date of the subscription, if any.
- Any limitations on the consumer's right to cancel the subscription at any time.

A provider must disclose the subscription terms in context with each other, and may not separate those terms by promotional information. The provider must disclose the terms in writing except that, if a consumer subscribes orally or electronically, the provider may disclose the terms orally or electronically if both of the following apply:

- The provider confirms the disclosure in writing on or before the 15th day after the consumer subscribes, or on or before the day that the provider first bills the consumer under the subscription, whichever occurs later.
- The provider notifies the consumer that the consumer may cancel the subscription at any time, or at any time prior to a specified cancellation deadline which is not less than 3 days after the consumer receives the written confirmation of subscription terms, without paying any cancellation fee or disconnect charge.

A provider of long distance telecommunications services need not, as part of an initial disclosure, disclose specific rates for long distance calls if the provider discloses all of the following:

- Any discounts that will apply to that consumer's calls.
- A method by which the consumer may readily determine, without cost to the consumer, the specific rate for a long distance call (not counting the consumer's individual discounts, if any).

A provider of pay-per-view cable television service need not, as part of an initial disclosure of subscription terms, disclose specific charges per view if all of the following apply:

- The consumer does not incur the per-view charges unless the consumer specifically orders the services to which those charges pertain.
- The provider discloses the per-view charges at or before the time that the consumer orders the services to which those charges pertain.
- The provider discloses any subscription charges which the consumer must pay for the right to order pay-per-view services.

Subscription Changes

Under this rule, no provider may initiate a price increase or other subscription change without giving the consumer between 25 to 90 days prior notice of the subscription change. The notice requirement does not apply if any of the following applies:

- The consumer orders the subscription change and the provider complies with applicable disclosure and confirmation requirements.
- The subscription change does not alter the price of any service offering or the total amount billed to the consumer, and does not materially alter the consumer features, functions or capabilities which comprise any service offering.
- The subscription change merely expands a service offering currently billed to the consumer without doing any of the following:
 - Increasing the price of that service offering.
 - Combining that service offering with another service offering which the consumer can order separately, but which the consumer has not affirmatively ordered.

- Making other changes in the relevant consumer features, functions or capabilities which comprise that service offering.
- The subscription change results from the expiration of an introductory or other promotional offer, and the provider disclosed both of the following before the consumer subscribed:
 - The duration of the promotional offer.
 - The terms that would apply after the promotional offer expired.
- The subscription change is limited to a change in long distance rates that are exempt from disclosure under this rule (see above).
- The subscription change is limited to a change in pay-per-view cable television charges that are exempt from disclosure under this rule (see above).
- The subscription change is exempt from this rule, because it is regulated by the Wisconsin public service commission (see above).

Under this rule, advance notice of a subscription change must be in writing. The notice must do all of the following:

- Clearly describe the proposed change, including any change in price, features, functions or capabilities.
- Specify the effective date of the proposed change.
- Disclose that the consumer may cancel any service offering affected by the change, without paying any cancellation charge or disconnect fee, effective not later than the effective date of the subscription change. This disclosure is not required if, under the prior disclosed terms of the subscription, the consumer is already free to cancel at any time without paying a cancellation charge or disconnect fee.

Negative Option Billing

This rule prohibits a provider from billing a consumer for a service offering that the consumer has not affirmatively ordered. A consumer's failure to reject a service offering is not an affirmative order for service. A consumer's affirmative order for service may be made orally, electronically or in writing.

This rule does not require a provider to obtain an affirmative order from a consumer before expanding a service offering currently billed to that consumer unless the expansion has the effect of combining that service offering with another service offering which the consumer can order separately but has not affirmatively ordered.

Automatic Renewal or Extension

Under this rule, no subscription for a definite period of time may be renewed or extended beyond its scheduled termination date, pursuant to an automatic renewal or extension provision, unless one of the following applies:

- The consumer is free to cancel the contract at any time.
- The provider gives the consumer a written notice reminding the consumer of the scheduled automatic renewal or extension. The reminder notice must be given at least 30 days but not more than 60 days prior to the scheduled effective date of the automatic renewal or extension, and may be included as part of any billing statement given to the consumer during this time period.

Prohibited Practices.

Under this rule, no provider may do any of the following:

- Offer to a consumer any prize, prize opportunity, or free or reduced price goods or services whose receipt is conditioned upon the consumer entering into a contract for telecommunications service or cable television service unless the provider discloses that a purchase is required.
- Misrepresent the provider's identity.
- Misrepresent that a consumer has subscribed to or received a telecommunications service or cable television service.
- Misrepresent the terms of a subscription.
- Fail to identify, in each bill presented to a consumer, the service offerings for which the provider is billing the consumer.
- Fail to honor, on a timely basis, a consumer's request to cancel a telecommunications service or cable television service according to this chapter and the terms of the subscription.

- Charge a consumer a fee for canceling a subscription or service offering unless the fee is disclosed in the subscription according to this rule.
- Bill a consumer for a telecommunications service or cable television service in violation of this chapter.
- Propose or enter into any contract with a consumer that purports to waive a consumer's rights under this chapter, or that purports to authorize any violation of this chapter.

Effective Date

This rule takes effect on January 1, 1997, and first applies to contracts, subscriptions, contract changes and subscription changes made on or after that date.

Consultation with Department of Justice

The department developed this rule in consultation with the department of justice, as required under s. 100.207(6)(e), Stats.

1 **SECTION 1.** Chapter ATCP 123, Wis. Adm. Code, is created to
2 read:

3 **CHAPTER ATCP 123**

4 **TELECOMMUNICATIONS AND CABLE TELEVISION SERVICES**

5
6 **NOTE:** This chapter regulates subscription and billing
7 practices related to telecommunications services and
8 cable television services provided to consumers.
9

10 This chapter is adopted under authority of s. 100.20(2)
11 and 100.207(6)(e), Stats. Violations of this chapter
12 may be subject to prosecution under s. 100.20(6),
13 100.26(3), 100.26(6) and, in the case of
14 telecommunications services, 100.207(6)(b) and (c),
15 Stats. Persons damaged by violations of this chapter
16 may bring private actions against the violators under
17 ss. 100.20(5) and 100.207(6)(a), Stats.
18

19 Federal law recognizes that state administrative rules
20 may under certain circumstances be preempted by federal
21 law or administrative action. It is the position of
22 the department that any provision of this rule which

1 specifically conflicts with any federal law which now
2 exists, or is later enacted or amended, would be
3 superseded by the federal law.
4

5 ATCP 123.01 DEFINITIONS. In this chapter:

6 (1) "Appointed provider of long distance telecommunications
7 services" means a provider selected for a consumer according to
8 procedures prescribed by the federal communications commission
9 after the consumer fails to select a provider.

10 (2) "Bill" means to represent to a consumer, directly or by
11 implication, that the consumer is obligated to pay a stated
12 amount for telecommunications services or cable television
13 services pursuant to an existing contract with the provider of
14 those services.

15 (3) "Cable television service" has the meaning given in s.
16 196.01(1p), Stats., and includes services billed to consumers by
17 a multichannel video programming distributor as defined under 47
18 USC 522(12).

19 (4) "Consumer" means any individual to whom a provider
20 sells, leases, or offers to sell or lease telecommunications
21 services or cable television services primarily for personal,
22 family or household purposes.

23 (5) "Disclose" means to make a clear and conspicuous
24 statement which is designed to be readily noticed and understood
25 by the consumer and, if the disclosure is made in writing, which
26 is designed to be retained by the consumer.

27 (6) "Final stage receiving device" means a telephone,

1 television or other device that transforms an electronic signal
2 into a user-recognizable service used by a consumer.

3 (7) "Individual" means a human being.

4
5 (8) "Long distance telecommunications service" means a long
6 distance toll service provided on a direct-dialed, single
7 message, dial-1 basis between local exchanges.

8 (9) "Person" means an individual, corporation, cooperative,
9 partnership, limited liability company, business trust, or
10 business association or entity.

11 (10) "Provider" means a person who sells, resells, leases,
12 or offers to sell, resell or lease telecommunications services or
13 cable television services to consumers. "Provider" includes an
14 employee or agent who is authorized to act on behalf of and in
15 the name of a provider.

16 NOTE: "Provider" includes a telemarketer or other person
17 who sells telecommunications services or cable
18 television services on behalf of and in the name of a
19 provider.

20 (11) "Service offering" means a telecommunication service
21 or cable television service that is offered under a single name
22 or at a single price. A "service offering" includes a cable
23 television "service tier," as defined in 47 USC 522.

24 (12) "Subscribe" means to enter into a subscription.

25 (13) "Subscription" means a contract between a provider and
26 a consumer for telecommunications services or cable television
27 services, or both, which are provided or billed to the consumer

1 on a continuing or periodic basis. "Subscription" includes an
2 oral, written or electronically recorded contract, and includes
3 any material amendment to an existing contract.

4 (14) "Telecommunications carrier" has the meaning given in
5 s. 196.01(8m), Stats.

6 (15) "Telecommunications service" has the meaning given in
7 s. 196.01(9m), Stats.

8 (16) "Telecommunications utility" has the meaning given in
9 s. 196.01(10), Stats.

10 (17) "Written" or "in writing" means legibly printed on a
11 tangible non-electronic medium, such as paper, which is delivered
12 to a consumer, or legibly printed in electronic form on a
13 television screen or computer monitor if the consumer can readily
14 retrieve, store or print the video image for future reference.

15 "Written" or "in writing" does not include presentation on a
16 medium, such as a billboard, which cannot be conveniently
17 retained by a consumer.

18 **ATCP 123.02 DISCLOSURE TO SUBSCRIBER.** (1) SUBSCRIPTION

19 TERMS. Except as provided under sub. (4) or (5), a provider
20 shall disclose to a consumer the material terms of a proposed
21 subscription at or before the time that the consumer subscribes.

22 The disclosure shall include all of the following:

23 (a) A clear identification of each service offering
24 included in the subscription, including the material consumer
25 features, functions or capabilities which comprise that service

1 offering.

2 NOTE: For example, the identification of a cable television
3 service tier should identify the channels which
4 comprise that tier.
5

6 (b) The price which the consumer must pay for each service
7 offering. Prices may be disclosed as price schedules, rates or
8 formulas, provided that the consumer can readily determine the
9 total amount which he or she must pay. The price shall include
10 the price for all goods and services which the provider bills to
11 the consumer in connection with the service offering.

12 (c) All incidental charges that may affect the total amount
13 payable by the consumer, including charges for connecting,
14 changing or disconnecting service. This paragraph does not apply
15 to finance charges or late payment charges if the provider
16 discloses all of the following in writing when the provider first
17 bills the consumer for the principal amount to which those
18 finance charges or late payment charges apply:

19 1. The circumstances under which the finance charges or
20 late payment charges will apply.

21 2. The amount of the finance charges or late payment
22 charges, or the method for computing those charges if their
23 amount is not yet known.

24 (d) The effective date of the subscription unless all of
25 the following apply:

26 1. The effective date depends on the action of a third
27 party outside the provider's control.

1 2. The provider discloses a good faith estimate of the
2 effective date and a means by which the consumer may verify the
3 effective date.

4 (e) The expiration date of the subscription, if any.

5 (f) Any limitations on the consumer's right to cancel the
6 subscription at any time.

7 (2) DISCLOSURE IN WRITING. Except as provided under sub.
8 (3), a provider shall make the disclosures under sub. (1) in
9 writing. The provider shall disclose the material terms of the
10 subscription in context with each other, and shall not separate
11 those material terms by promotional information.

12 (3) ORAL OR ELECTRONIC DISCLOSURE; WRITTEN CONFIRMATION.

13 If a consumer subscribes orally or electronically, the provider
14 may make the disclosure under sub. (1) orally or electronically,
15 provided that both of the following apply:

16 (a) The provider confirms the disclosure in writing on or
17 before the 15th day after the consumer subscribes, or on or
18 before the day that the provider first bills the consumer under
19 the subscription, whichever is later. The provider may confirm
20 the disclosure as part of a regular billing statement to the
21 consumer.

22 NOTE: A provider may incorporate by reference, in its
23 written confirmation under par. (a), information
24 contained in a telephone book or other periodic
25 reference document provided to the subscriber.

26 (b) The provider does one of the following:
27

1 1. Notifies the consumer that the consumer may cancel the
2 subscription at any time without incurring any cancellation
3 charge or disconnect fee.

4 2. Notifies the consumer that the consumer may cancel the
5 subscription, without incurring any cancellation charge or
6 disconnect fee, prior to a specified cancellation deadline which
7 is not less than 3 days after the consumer receives the written
8 confirmation under par. (a).

9 (4) LONG DISTANCE TELECOMMUNICATIONS RATES; EXEMPTION. A
10 provider of long distance telecommunications services need not
11 disclose specific long distance rates under sub. (1) if the
12 provider discloses all of the following under sub. (1):

13 (a) A method by which the consumer may readily determine,
14 without cost to the consumer, the specific rate for long distance
15 telecommunications service between two points. Rates disclosures
16 under this paragraph need not include discounts under par. (b)
17 that will apply.

18 (b) Any discounts that will apply to long distance rates
19 disclosed to the consumer under par. (a).

20 (5) PAY-PER-VIEW CABLE TELEVISION CHARGES; EXEMPTION. A
21 provider of pay-per-view cable television service need not
22 disclose per-view charges under sub. (1) if all of the following
23 apply:

24 (a) The consumer does not incur the per-view charges unless
25 the consumer specifically orders the services to which those

1 charges pertain.

2 (b) The provider discloses the per-view charges at or
3 before the time that the consumer orders the services to which
4 those charges pertain.

5 (c) The provider discloses under sub. (1) any subscription
6 charges which the consumer must pay for the right to order pay-
7 per-view services under par. (a).

8 ATCP 123.04 SUBSCRIPTION CHANGES. (1) DISCLOSURE

9 REQUIRED. Except as provided under sub. (2), no provider may
10 initiate any price increase or other subscription change without
11 giving the consumer prior notice of that price increase or
12 subscription change. The provider shall give the notice at least
13 25 days, but not more than 90 days, prior to the subscription
14 change. The provider may give the notice as part of a regular
15 billing statement to the consumer.

16 NOTE: Section 134.42(2), Stats., requires a cable
17 television provider to give a consumer at least 30 days
18 advanced written notice before deleting a service or
19 instituting a rate increase. 47 USC 76.309(3)(i)(B)
20 requires a cable television provider to give consumers
21 a 30-day advance notice of any changes in rates or
22 services regulated under 47 USC 543.

23 (2) EXEMPTIONS. Subsection (1) does not apply if any of
24 the following apply:

25 (a) The consumer orders the subscription change, and the
26 provider complies with s. ATCP 123.02 in connection with that
27 order.

28 (b) The subscription change does not alter the price of the

1 service offering or the total amount billed to the consumer, and
2 does not materially alter the consumer features, functions or
3 capabilities which comprise the service offering.

4 (c) The subscription change merely expands a service
5 offering currently billed to the consumer without doing any of
6 the following:

7 1. Increasing the price of that service offering or
8 increasing the total amount billed to the consumer.

9 2. Combining that service offering with another service
10 offering which the consumer can order separately, but which the
11 consumer has not affirmatively ordered.

12 3. Making other material changes to the consumer features,
13 functions or capabilities which comprise that service offering.

14 (d) The subscription change results from the expiration of
15 terms granted to the consumer under an introductory or other
16 promotional offer, provided that the provider disclosed both of
17 the following to the consumer at or before the time that the
18 consumer subscribed:

19 1. The duration of the promotional offer.

20 2. The terms that would apply after the promotional offer
21 expired.

22 (e) The subscription change is limited to a change in long
23 distance rates that are exempt from disclosure under s. ATCP
24 123.02(4).

25 (f) The subscription change is limited to a change in pay-

1 per-view cable television charges that are exempt from disclosure
2 under s. ATCP 123.02(5).

3 (g) Section ATCP 123.12 exempts the subscription change
4 from coverage under this chapter.

5 (3) DISCLOSURE FORM AND CONTENTS. A provider shall make
6 the disclosure under sub. (1) in writing. The disclosure shall
7 do all of the following:

8 (a) Clearly describe the proposed subscription change,
9 including any change in price, and any material change in
10 consumer features, functions or capabilities.

11 NOTE: See s. ATCP 123.06 related to negative option
12 billing.

13 (b) Specify the effective date of the proposed change.

14 (c) Disclose that the consumer may cancel any service
15 offering directly or indirectly affected by the change, without
16 incurring a cancellation charge or disconnect fee, effective not
17 later than the effective date of the subscription change. This
18 disclosure is not required if, under the terms of the
19 subscription, the consumer may cancel service offerings at any
20 time without incurring a cancellation charge or disconnect fee.

21 **ATCP 123.06 NEGATIVE OPTION BILLING.** (1) PROHIBITION.

22 Except as provided under subs. (2) or (3), no provider may bill a
23 consumer for a service offering that the consumer has not
24 affirmatively ordered. A consumer's failure to reject a service
25 offering is not an affirmative order for service. A consumer's
26

1 affirmative order for service may be made orally, electronically
2 or in writing, subject to s. ATCP 123.02.

3 (2) EXPANDED SERVICE OFFERING; EXEMPTION. A provider need
4 not obtain an affirmative order from a consumer before expanding
5 a service offering currently billed to that consumer unless the
6 expansion has the effect of combining that service offering with
7 another service offering which the consumer can order separately
8 but has not affirmatively ordered.

9 NOTE: See s. ATCP 123.04 related to advance notice of price
10 increases and other subscription changes, including
11 expansions of service offerings.
12

13 (3) LONG DISTANCE TELECOMMUNICATIONS SERVICES, EXEMPTIONS.

14 (a) Subsection (1) does not prohibit a provider of
15 telecommunications services from billing a consumer for services
16 which that provider is required by law to deliver to that
17 consumer.

18 (b) Subsection (1) does not prohibit a consumer's appointed
19 provider of long distance telecommunications services, merely
20 because that consumer did not affirmatively select that provider,
21 from billing that consumer for services used by that consumer.

22 **ATCP 123.08 AUTOMATIC RENEWAL OR EXTENSION.** No
23 subscription for a definite period of time may be renewed or
24 extended beyond its scheduled termination date, pursuant to an
25 automatic renewal or extension provision in the contract, unless
26 one of the following applies:

27 (1) The consumer is free to cancel the contract at any

1 time.

2 (2) The provider gives the consumer a written notice
3 reminding the consumer of the scheduled automatic renewal or
4 extension. The reminder notice shall be designed to be readily
5 noticed and understood by the consumer. The notice shall be
6 given at least 30 days but not more than 60 days prior to the
7 scheduled effective date of the automatic renewal or extension.

8 NOTE: A written notice under this section may be included
9 as part of any billing statement given to the consumer
10 at least 30 days but not more than 60 days prior to the
11 effective date of the automatic renewal.

12 **ATCP 123.10 PROHIBITED PRACTICES.** No provider may do any
13 of the following:

14 (1) Offer to a consumer any prize, prize opportunity, or
15 free or reduced price goods or services whose receipt is
16 conditioned upon an agreement to purchase or lease
17 telecommunications services or cable television services unless
18 the provider discloses that a purchase is required in connection
19 with every public announcement or advertisement of the prize,
20 prize opportunity, or free or reduced price goods or services.

21 NOTE: See also s. 134.74, Stats., and ATCP 123.02.

22 (2) Misrepresent the provider's identity to a consumer.

23 (3) Misrepresent that a consumer has subscribed to or
24 received a telecommunications service or cable television
25 service.

26 (4) Misrepresent the terms of a subscription.

1 (5) Fail to identify, in each bill presented to a consumer,
2 the service offerings for which the provider is billing the
3 consumer.

4 (6) Fail to honor, on a timely basis, a consumer's request
5 to cancel a telecommunications service or cable television
6 service according to this chapter and the terms of the
7 subscription for that service.

8 (7) Charge a consumer a fee for canceling a subscription or
9 service offering unless the fee is disclosed to the consumer
10 according to ss. ATCP 123.02 and 123.04.

11 NOTE: Section ATCP 123.04(2) limits cancellation charges
12 and disconnect fees in some cases, regardless of
13 whether those fees are disclosed.
14

15 (8) Bill a consumer for telecommunications services or
16 cable television services in violation of this chapter.

17 (9) Propose or enter into any contract with a consumer that
18 purports to waive a consumer's rights under this chapter, or that
19 purports to authorize any violation of this chapter.

20 **ATCP 123.12 ACTIVITIES REGULATED BY PUBLIC SERVICE**

21 **COMMISSION.** (1) This chapter does not apply to any of the
22 following:

23 (a) Any activity, including any notice to a consumer of a
24 subscription change, that is specifically authorized under ss.
25 196.194(1), 196.207, 196.20, or 196.499(4), Stats., or under a
26 rule or order issued by the state of Wisconsin public service
27 commission.

1 NOTE: For example, s. PSC 165.043(5) requires a
2 telecommunications utility to disclose specific
3 information before providing a new non-basic service.
4 Therefore, the more extensive disclosure requirements
5 under s. ATCP 123.02(1) do not apply. However, if the
6 disclosures required by the PSC are made orally, the
7 disclosures must be confirmed in writing pursuant to s.
8 123.02(3).
9

10 (b) A subscription change which a telecommunications
11 provider implements by means of a tariff under ch. 196, Stats.,
12 other than a tariff change under s. 196.196(3) or 196.499(2),
13 Stats.

14 (2) This chapter does not authorize any activity prohibited
15 by ch. 196, Stats., or by the state of Wisconsin public service
16 commission under ch. 196, Stats.

17 **ATCP 123.14 INITIAL APPLICABILITY.** This chapter first
18 applies to contracts, subscriptions, contract changes and
19 subscription changes that take effect on or after January 1,
20 1997.

21 **EFFECTIVE DATE.** The rules contained in this order shall
22 take effect on January 1, 1997.

23 Dated this 23rd day of May, 1996.

24 STATE OF WISCONSIN
25 DEPARTMENT OF AGRICULTURE,
26 TRADE AND CONSUMER PROTECTION
27

28 By 
29 Alan T. Tracy, Secretary
30
31
32