

SEP - 2 2015

**RECEIVED** IN THE UNITED STATES COURT OF APPEALS **CLERK**  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

CHAMBER OF COMMERCE OF )  
THE UNITED STATES OF )  
AMERICA )

15-1306

*Petitioner,* )

Case No. 15-\_\_\_\_\_

v. )

FEDERAL COMMUNICATIONS )  
COMMISSION and UNITED )  
STATES OF AMERICA, )

*Respondents.* )

ORIGINAL

**PETITION FOR REVIEW**

Pursuant to Section 402(a) of the Communications Act of 1934, 47 U.S.C. § 402(a), 28 U.S.C. §§ 2342-2344, 5 U.S.C. § 706, and Rule 15(a) of the Federal Rules of Appellate Procedure, the Chamber of Commerce of the United States of America (“Chamber”) hereby petitions this Court for review of an order of the Federal Communications Commission (“Commission”) captioned *In re Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Declaratory Ruling and Order, CG Docket No. 02-278, WC Docket No. 07-135, FCC 15-72 (rel. July 10, 2015) (“Declaratory Ruling and Order”). A copy of the Declaratory Ruling and Order is attached to this Petition as Attachment A.

Venue lies in this Court under 28 U.S.C. § 2343, and because this Court was selected pursuant to the lottery procedures set forth in 28 U.S.C. § 2112(a) as the

forum for consolidating multiple, previously filed petitions for review of the Declaratory Ruling and Order. *See* Consolidation Order, *In re Rules & Regulations Implementing the Telephone Consumer Protection Act of 1991*, MCP No. 134 (J.P.M.L. July 24, 2015).<sup>1</sup>

In the Declaratory Ruling and Order, the Commission vastly expands the scope of the Telephone Consumer Protection Act of 1991 (“TCPA”) in several ways, including by sweeping in calls to wireless numbers made from equipment that is not currently able “to store or produce telephone numbers to be called, using a random or sequential number generator,” and “to dial such numbers.” 47 U.S.C. § 227(a)(1); *see* Declaratory Ruling and Order ¶¶ 10-24. The Declaratory Ruling and Order also improperly defines the term “called party” for purposes of the TCPA’s prior express consent provisions as the “current subscriber (or non-subscriber customary user of the phone),” rather than the intended recipient of a call. *See* Declaratory Ruling and Order ¶ 72. Moreover, it gives a caller only one call before imposing strict liability for calls made to numbers that, without the caller’s knowledge, have been reassigned from a person who previously gave express consent—even if that one call goes unanswered or the circumstances surrounding the call otherwise could not have provided the caller with actual or

---

<sup>1</sup> Those petitions are now pending in lead Case No. 15-1211 and consolidated Case Nos. 15-1218, 15-1244, and 15-1278. This petition should likewise be consolidated with those cases.

constructive knowledge of the reassignment, and despite the fact that there is no practical way to verify the continued accuracy of numbers before a call is placed. *See id.* ¶¶ 85-97. The Declaratory Ruling and Order also sets forth certain rules that limit the TCPA's consent defense. *See id.* ¶¶ 47-70, 98-102. Among other things, the Declaratory Ruling and Order provides that "a called party may revoke consent at any time and through any reasonable means" and affirmatively prohibits a caller from "limit[ing] the manner in which revocation may occur." *Id.* ¶ 47.

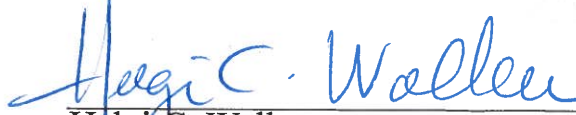
The Declaratory Ruling and Order's new, overbroad, and atextual interpretations of the TCPA will expose legitimate businesses across the country—of all sizes and types—to liability for simply attempting in good faith to communicate with customers who previously provided valid consent to be contacted. Furthermore, the Declaratory Ruling could turn even a mass-market smartphone into a covered "autodialer," and threatens to create an utterly unworkable regime for the logistics of receiving and processing consent revocation. Because the TCPA is increasingly the basis for class actions that seek crippling damages, *see id.* ¶ 6, these results are particularly harmful for the Chamber's members.

In these respects and others, the Declaratory Ruling and Order is arbitrary and capricious, an abuse of discretion, in excess of the Commission's statutory authority, and otherwise contrary to the Constitution and other laws; and was

adopted without observance of procedure required by law. Accordingly, the Chamber respectfully requests that this Court (1) vacate or reverse the unlawful parts of the Declaratory Ruling and Order, (2) remand those unlawful parts to the Commission for an order consistent with this Court's findings, or (3) provide such other relief as this Court deems appropriate.

Dated: September 2, 2015

Respectfully submitted,



Kate Comerford Todd  
Steven P. Lehotsky  
Warren Postman  
U.S. CHAMBER LITIGATION  
CENTER, INC.  
1615 H Street, N.W.  
Washington, D.C. 20062  
(202) 463-5337

Helgi C. Walker  
Scott P. Martin  
Lindsay S. See  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Ave., N.W.  
Washington, D.C. 20036  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539

*Attorneys for Petitioner the Chamber of  
Commerce of the United States*



SEP - 2 2015

**RECEIVED** IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

CHAMBER OF COMMERCE OF )  
THE UNITED STATES OF )  
AMERICA )

*Petitioner,*

v.

FEDERAL COMMUNICATIONS )  
COMMISSION and UNITED )  
STATES OF AMERICA, )

*Respondents.*

15-1306

Case No. 15-\_\_\_\_\_

ORIGINAL

**CORPORATE DISCLOSURE STATEMENT**

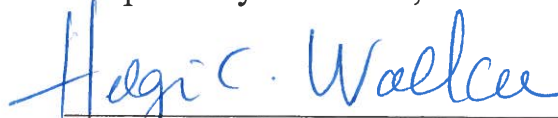
Pursuant to Federal Rule of Appellate Procedure 26.1 and this Court's Rule 26.1, Petitioner the Chamber of Commerce of the United States of America ("Chamber") states as follows:

The Chamber does not have any parent corporation, and no publicly held corporation owns 10% or more of its stock. The Chamber is the world's largest business federation. It represents 300,000 direct members and indirectly represents the interests of more than three million companies and professional organizations of every size, in every industry sector, and from every region of the country. An important function of the Chamber is to represent the interests of its members in matters before the courts, Congress, and the Executive Branch.

Dated: September 2, 2015

Kate Comerford Todd  
Steven P. Lehotsky  
Warren Postman  
U.S. CHAMBER LITIGATION  
CENTER, INC.  
1615 H Street, N.W.  
Washington, D.C. 20062  
(202) 463-5337

Respectfully submitted,



---

Helgi C. Walker  
Scott P. Martin  
Lindsay S. See  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Ave., N.W.  
Washington, D.C. 20036  
Telephone: (202) 955-8500  
Facsimile: (202) 467-0539

*Attorneys for Petitioner the Chamber of  
Commerce of the United States*

SEP - 2 2015

15-1306

CERTIFICATE OF SERVICE

RECEIVED

FILED

SEP - 2 2015

CLERK

I hereby certify that copies of the foregoing Petition for Review and

Corporate Disclosure Statement have been served by hand, this 2nd day of  
September, 2015, upon the following parties:

Loretta E. Lynch  
Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Jonathan Sallet  
General Counsel  
Federal Communications Commission  
445 12th Street, S.W., 8th Floor  
Washington, DC 20554

UNITED STATES COURT OF APPEALS  
FOR DISTRICT OF COLUMBIA CIRCUIT

I further certify that I will cause a copy of the foregoing Petition for Review  
and Corporate Disclosure Statement to be served via hand delivery or first-class  
mail, postage prepaid, upon the following parties admitted to participate in the  
agency proceedings:



Natalie G. Roisman  
Wilkinson Barker Knauer, LLP  
2300 N Street , NW Suite 700  
Washington, DC 20037  
*Counsel for Glide Talk, Ltd*

Claudia Callaway  
Katten Muchin Rosenman LLP  
2900 K Street, NW, Suite 200  
Washington, DC 20007  
*Counsel for Greenway Health,  
LLC; RadNet Management, Inc.*

Ronald W. Del Sesto, Jr.  
Bingham McCutchen LLP  
2020 K Street NW  
Washington, DC  
20006-1806  
*Counsel for GroupMe, Inc.;  
TextMe, Inc.*

David M. Greenwald  
Jenner & Block LLP  
353 N. Clark St.  
Chicago, IL 60654  
*Counsel for Healthways, Inc.;  
Healthways WholeHealth  
Networks, Inc.*

Judith L. Harris  
Reed Smith LLP  
1301 K Street, NW  
Suite 1100 – East Tower  
Washington, DC 20005  
*Counsel for Henry Schein Practice  
Solutions, Inc.*

Erin A. Walsh  
Smith Amundsen, LLC  
150 North Michigan Avenue,  
Suite 3300  
Chicago, IL 60601  
*Counsel for 2217044 Ontario Inc.;  
Hydropool Inc.; La-Z-Boy Global  
Limited and La-Z-Boy Incorporated;  
American Homepatient, Inc.; First  
Index, Inc.; Integrated Pain  
Management, S.C.; Tian Medical, LLC  
Tian Medical Inc.; Dr. Tian,  
International Dental Supply Co.,  
Navinet, Inc.; Power Liens, LLC; UBM  
LLC*

Lauren Lynch Flick  
Pillsbury Winthrop Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037  
*Counsel for 3G Collect, Inc.; YouMail,  
Inc.*

Monica Desai  
Patton Boggs LLP  
2550 M Street NW  
Washington, DC 20037  
*Counsel for A Coalition of Mobile  
Engagement Providers; Abercrombie  
& Fitch Co.; ACA International,  
Cannon & Associates LLC d/b/a  
Polaris Group; Citizens Bank, N.A.;  
Monica S. Desai; Retail Industry  
Leaders Association; SoundBite  
Communications; Wells Fargo*

Suzanne S. Goodspeed  
Goodspeed & Merrill  
7000 E. Belleview Avenue  
Suite 355  
Greenwood Village, CO 80111  
*Counsel for Heska Corporation*

David Lender  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153  
*Counsel for Houghton Mifflin  
Harcourt Publishers, Inc.;  
Houghton Mifflin Harcourt  
Publishing*

Anthony J. Anscombe  
Sedgwick LLP  
One North Wacker Drive, Suite  
4200  
Chicago, IL 60606  
*Counsel for Howmedica Osteonics  
Corp*

Steve Brubaker  
Chief of Staff  
Info Cision Management corp  
325 Springside Drive  
Akron, OH 44333  
*Counsel for InfoCision  
Management Corporation, Inc.*

Dennis E. Nixon  
President  
IBC Houston  
5615 Kirby Dr.  
P.O. Box 6568  
Houston, TX 77005  
*Counsel for International  
Bancshares Corporation*

Howard W. Waltzman  
Mayer Brown LLP  
1999 K Street, NW  
Washington, DC 20006-1101  
*Counsel for ACA International;  
American Bankers Association*

Robert A. Burgoyne  
Fulbright & Jaworski LLP  
801 Pennsylvania Avenue, NW  
Washington, DC 20004  
*Counsel for ACT, Inc.*

Matthew A. Brill  
Latham & Watkins LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004  
*Counsel for Acurian, Inc.; Anda, Inc.;  
Time Warner Cable Inc.*

David C. Layden  
Jenner & Block LLP  
353 N. Clark St.  
Chicago, IL 60654  
*Counsel for AEP Energy, Inc.*

Daniel A. Edelman  
Edelman, Combs, Lattuner &  
Goodwin, LLC  
20 South Clark Street, Suite 1500  
Chicago, IL 60603  
*Counsel for Affiliated Health Care  
Associates, P.C.; Balmoral Home, Inc.;  
Wholesale Point, Inc.*

Peter Blenkinsop  
Drinker Biddle & Reath LLP  
1500 K Street NW  
Washington, DC 20005-1209  
*Counsel for IPPC; MDPC*

Joanne M. O'Connor  
Jones, Foster, Johnston & Stubbs,  
P.A.  
505 South Flagler Drive  
Suite 1100  
West Palm Beach, FL 33401  
*Counsel for J.L. Barnes Insurance  
Agency, Inc.*

Jennifer S. Moore  
Mid American Energy Company  
106 East Second Street  
P.O. Box 4350  
Davenport, IA 52808  
*Counsel for Jennifer S. Moore*

Husch Blackwell LLP  
190 Carondelet Plaza #600  
St. Louis, MO 63105  
*Counsel for Kaberline Healthcare  
Informatics, Inc.*

Debra R. Bernard  
Perkins Coie, LLP  
131 S. Dearborn Street, Suite 1700  
Chicago, IL 60603  
*Counsel for Kirby Lester, LLC*

Laurence E. Gold  
Assoc. General Counsel AFL-CIO  
815 16th Street, NW  
Washington, DC 20006  
*Counsel for Laurence E. Gold*

Laura Zepeda  
Director of Corporate Affairs  
AGR Group, LLC  
13100 56th Court, Suite 705  
Clearwater, FL 33760  
*Counsel for AGR Group, LLC; AGR  
Group, Inc.; AGR Group California,  
LLC; AGR Group Nevada, LLC*

John A. Prendergast  
Blooston, Mordkofsky, Dickens, Duffy  
& Prendergast, LLP  
2120 L Street, NW  
Suite 300  
Washington, DC 20037  
*Counsel for Alarm Industry  
Communications Committee*

Anthony J. Bolognese  
Two Penn Center  
1500 John F. Kennedy Blvd., Suite 320  
Philadelphia, PA 19102  
*Counsel for Alco Industries, Inc.*

Joshua C. Dickinson  
Spencer Fane Britt & Browne LLP  
12925 West Dodge Road, Suite 107  
Omaha, NE 68154  
*Counsel for All Granite & Marble  
Corp.*

Lawrence A. Baratta, Jr.  
1901 Roxborough Road  
Suite 250  
Charlotte, NC 28211  
*Counsel for Lawrence A Baratta,  
Jr.*

Stephen H. Turner  
Lewis Brisbois Bisgaard & Smith  
LLP  
8 West 38th Street  
Suite 201  
New York, NY 10018  
*Counsel for Logistic Innovations,  
LLC*

Joseph P. Kincaid  
Swanson, Martin & Bell, LLP  
330 North Wa'bash, Suite 3300  
Chicago, IL 60611  
*Counsel for Magna Chek, Inc.*

Angela E. Giancarlo  
Mayer Brown LLP  
1999 K Street, NW  
Washington, DC 20006-1101  
*Counsel for Mammoth Mountain  
Ski Area, LLC*

Kourtney Keough  
President/CEO Marketlink, Inc.  
4305 Fleur Drive  
Des Moines, IA 50321  
*Counsel for Marketlink, Inc.*

Michael Beder  
Covington & Burling LLP  
1201 Pennsylvania Ave. NW  
Washington, DC 20004  
*Counsel for Masimo Corporation*

Mark W. Brennan  
Hogan Lovells  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004  
*Counsel for American Association of  
Healthcare Administrative  
Management, CARFAX, Inc.; Cargo  
Airline Association; Communication  
Innovators; Global Connect LLC; RTI  
International; United Healthcare  
Services, Inc.; United HealthGroup  
Incorporated; Varolii Corporation*

Charles H. Kennedy  
The Kennedy Privacy Law Firm  
1050 30th Street, NW  
Washington, DC 20007  
*Counsel for American Bankers  
Association*

Eileen M. Patt  
Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
*American CareSource Holdings, Inc.*

Joseph Hartsoe  
Managing Director, Federal Policy  
American Electric Power  
801 Pennsylvania Ave NW #320  
Washington, DC 20004  
*Counsel for American Electric Power*

Jenna Goodfellow  
Senior Counsel  
MasterCard Incorporated  
2000 Purchase Street  
Purchase, New York 10577-2509  
*Counsel for MasterCard  
Incorporated*

Max G. Margulis  
Margulis Law Group  
28 Old Belle Monte Rd.  
Chesterfield, MO 63017  
*Counsel for Max G. Margulis*

Judith L. Harris  
Reed Smith LLP  
1301 K Street, NW  
Suite 1100 – East Tower  
Washington, DC 20005  
*Counsel for McAllister Software  
Systems, LLC*

Joseph R. Palmore  
Morrison & Foerster LLP  
2000 Pennsylvania Ave., NW,  
Suite 6000  
Washington, DC 20006-1888  
*Counsel for McKesson  
Corporation*

Geoffrey M. Klineberg  
Kellogg, Huber, Hansen, Todd,  
Evans & Figel, PLLC  
1615 M Street, NW, Suite 400  
Washington, DC 20036  
*Counsel for Meadowbrook  
Insurance Group, Inc.;  
Meadowbrook, Inc.*

Samuel Feldman  
Orloff, Lowenbach, Stifelman &  
Siegel, P.A.  
101 Eisenhower Parkway, Suite 400  
Roseland, NJ 07068-1097  
*Counsel for American Institute for  
Foreign Study, Inc.; Five-M Software  
Systems Corp.*

Angela M. Gleason  
Associate Counsel  
American Insurance Association  
2101 L Street, NW  
Suite 400  
Washington, DC 20037  
*Counsel for American Insurance  
Association*

Mark E. Sobel  
Law Offices of Gerald P. Gross, P.C.  
366 Pearsall Avenue, Suite 5  
Cedarhurst, New York 11516  
*Counsel for American Power & Gas  
LLC; AP&G Holdings LLC; Tom  
Cummins*

Mitchell N. Roth  
Roth Doner Jackson, PLC  
8200 Greensboro Drive, Suite 820  
McLean, VA 22102  
*Counsel for Dialing Services, Inc.*

Geraldine A. Cheverko, Esq.  
Fidelity National Law Group  
350 Fifth Avenue, Suite 3000  
New York, NY 10118  
*Counsel for Amicus Mediation &  
Arbitration Group, Inc.*

Matthew H. Geelan  
Donahue, Durham & Noonan, PC  
741 Boston Post Road  
Guilford, CT 06437  
*Counsel for Medica, Inc.,  
MedLearning, Inc.*

Tanya L. Forsheit  
Baker & Hostetler LLP  
11601 Wilshire Boulevard  
Suite 1400  
Los Angeles, CA 90025-0509  
*Counsel for Medversant  
Technologies, L.L.C.*

Alexander H. Burke  
GoumailBurke Law Offices, LLC  
155 N. Michigan Ave.  
Suite 9020  
Chicago, IL 60601  
*Counsel for Megan Gold*

Kim E. Rinehart  
Wiggin and Dana LLP  
One Century Tower  
PO Box 1832  
New Haven, Connecticut 06508-  
1832  
*Counsel for Merck & Co., Inc.*

Randall W. Slade  
Franco & Moroney, LLC  
500 West Madison Street  
Suite 2440  
Chicago, IL 60661-2593  
*Counsel for Microwize  
Technology, Inc.*

Brian J. Wanca  
Anderson & Wanca  
3701 Algonquin Road, Suite 760  
Rolling Meadows, IL 60008  
*Counsel for Anderson & Wanca; Beck  
Simmons LLC; CE Design Ltd.; J.  
Barrett Company; Radha Geismann,  
M.D., P.C.; Central Alarm Si,  
Christopher Lowe Hicklin, DC, PLC;  
North Branch Pizza and Burger  
Company; True Health Chiropractic,  
Inc.; Alan Pres, Physicians  
Healthsource, Inc.; Sandusky Wellness  
Center, LLC; Alan L. Laub DDS, Inc.;  
Physicians Healthsource, William P.  
Sawyer; M.D., Douglas Burik, St.  
Louis Heart Center, Inc.; Medical  
Wellness*

Brian D. Weimer  
2099 Pennsylvania Ave. NW  
Suite 100  
Washington, DC 20006  
*Counsel for Apex Energetics, Inc.;  
Electronic Funds Source LLC, EXP  
Pharmaceutical Services Corp.;  
Premier Healthcare Exchange, Inc.;  
Rite Aid Hdqtrs. Corp.; TruckersB2B,  
LLC*

John T. Nakahata  
Harris, Wiltshire & Grannis LLP  
1919 M Street  
Eighth Floor  
Washington, DC 20036  
*Counsel for Arbitron, Inc.; T-Mobile  
USA, Inc.*

Cara J. Frey  
General Counsel  
Mobile Marketing Association  
770 Broadway, 2nd Floor  
New York, NY 10003  
*Counsel for Mobile Marketing Association, et al.*

Stephen A. O'Connor  
Senior VP  
Mortgage Bankers Association  
1919 M Street NW, 5th floor  
Washington, DC 20036  
*Counsel for Mortgage Bankers Association*

Jim McPherson  
2030 M Street, NW  
Eighth Floor  
Washington, DC 20036  
*Counsel for National Association of Attorneys General*

Ann West Bobeck  
National Association of Broadcasters  
1771 N Street, NW  
Sixth Floor  
Washington DC 20036  
*Counsel for National Association of Broadcasters*

Don M. Bell, III  
General Counsel  
1776 Wilson Blvd.  
Suite 200  
Arlington, VA 22209  
*Counsel for National Association of Chain Drug Stores*

Philip A. Bock  
Bock & Hatch, LLC  
134 N. La Salle St. Suite 1000  
Chicago, IL 60602  
*Counsel for Arwa Chiropractic, P.C.; Dr. Robert L. Meinders, DC, Ltd.; Grind Lap Services, Inc.; St. Louis Heart Center, Inc.; Urban Elevator Service, LLC; Wilder Chiropractic Inc.*

Aryeh B. Fishman  
Associate General Counsel, Regulatory Legal Affairs  
Edison Electric Institute  
701 Pennsylvania Avenue, NW  
Washington DC 20004-2696  
*Counsel for Aryeh B. Fishman; Edison Electric Institute*  
Eric L. Samore  
SmithAmundsen LLC  
150 N. Michigan Avenue, Suite 3300  
Chicago, IL 60601  
*Counsel for A-S Medication Solutions, LLC*

William L. Roughton, Jr.  
1120 20th Street, NW  
Suite 1000  
Washington, DC 20036  
*Counsel for AT&T Services Inc.*

Aytan T. Bellin  
Bellin & Associates LLC  
85 Miles Avenue  
White Plains, NY 10606  
*Counsel for Aytan Y. Bellin, Bais Yaakov of Spring Valley, P & S Printing LLC*

Erik Glavich  
Director, Legal & Regulatory  
Policy  
National Association of  
Manufacturers  
733 10th Street NW  
Suite 700  
Washington, DC 20001  
*Counsel for National Association  
of Manufacturers*

James Bradford Ramsay  
General Counsel  
National Association of  
Regulatory Utility Commissioners  
1101 Vermont Ave, NW  
Suite 200  
Washington, DC 20005  
*Counsel for National Association  
of Regulatory Utility  
Commissioners*

Joann Needleman, President  
National Association of Retail  
Collection Attorneys  
601 Pennsylvania Avenue, NW  
Washington, DC 20004  
*Counsel for National Association  
of Retail Collection Attorneys*

Stephanie L. Poday  
VP and Associate General  
Counsel  
National Cable & Telecomm.  
Association  
25 Massachusetts Avenue, NW  
Suite 100  
Washington, DC 20001  
*Counsel for National Cable &  
Telecommunications Association*

Bart Murphy  
Ice Miller LLP  
2300 Cabot Drive, Suite 455  
Lisle, IL 60532  
*Counsel for Bart Murphy; Northwood,  
Inc.; Valeant Pharmaceuticals North  
America, LLC*

Beth-Ann Krimsky  
Greenspoon Marder, P.A.  
200 East Broward Boulevard  
Suite 1800  
Fort Lauderdale, FL 33301  
*Counsel for Beth-Ann E. Krimsky*  
Martin L. Daesch  
Sandberg, Phoenix & Von Gontard, PC  
600 Washington – 15th Floor  
St. Louis, MO 63101-1313  
*Counsel for Be-Thin, Inc.; Kevin  
Eberly*

William H. Latham  
Nelson Mullins Riley &  
Scarborough LLP  
1320 Main Street/17th Floor  
Columbia, SC 29201  
*Counsel for Big Hairy Dog Information  
Systems Inc.; Retail Pro International,  
LLC*

Dean Newton  
Associate General Counsel  
Blackboard Inc.  
1518 Wesley Court  
Brentwood, TN 37027  
*Counsel for Blackboard, Inc.*



Margot Saunders  
Of Counsel National Consumer  
Law Center  
1001 Connecticut Avenue, NW  
Suite 510  
Washington, DC 20036  
*Counsel for National Consumer  
Law Center*

Paul Luttrell, NENA Chairman  
Adelante Enterprises  
1618 1st St NW  
Albuquerque, NM 87102  
*Counsel for National Employment  
Network Association*

Karen R. Harned  
Executive Director of NFIB  
Small Business Legal Center  
1201 F St NW #200  
Washington, DC 20004  
*Counsel for National Federation  
of Independent Business*

Marianne R. Casserly  
Alston & Bird LLP  
The Atlantic Building  
950 F Street, NW  
Washington, DC 20004-1404  
*Counsel for National Grid*

Patrick F. Philbin  
Kirkland & Ellis LLP  
655 15th Street, NW  
Washington, DC 20005  
*Counsel for National Pen Co.  
LLC; National Pen Holdings, LLC*

Cynthia B. Harris  
Senior Assistant General Counsel  
1 North Dearborn - Suite 900  
Chicago, IL 60602  
*Counsel for Board of Education of the  
City of Chicago (Chicago Public  
Schools)*

Thomas D. Goldberg  
Day Pitney LLP  
One Canterbury Green  
201 Broad Street  
Stamford, CT 06901  
*Counsel for Boehringer Ingelheim  
Pharmaceuticals, Inc., and Boehringer  
Ingelheim Corporation*

Marc S. Roth  
Manatt, Phelps & Phillips, LLP  
7 Times Square  
New York, NY 10036  
*Counsel for Brand Activation  
Association, Inc.*

Karl Walsh  
General Manager  
Brandtone North America  
35 West 9th Street, Unit 3A  
New York, NY 10011  
*Counsel for Brandtone, Inc.*

Bradley M. Baglien  
Edelson McGuire LLC  
350 North LaSalle St. Suite 1300  
Chicago, IL 60654  
*Counsel for Brian Glauser*

Mallory B. Duncan  
Senior Vice President  
General Counsel  
1101 New York Ave, NW #1200  
Washington, DC 20005  
*Counsel for National Retail  
Federation*

Tracy Marshall  
Keller and Heckman LLP  
1001 G Street, NW  
Suite 500 West  
Washington, DC 20001  
*Counsel for National Rural  
Electric Cooperative Association*

Al Mottur  
Shareholder  
Brownstein Hyatt Farber  
Schreck, LLP  
1350 I Street, NW, Suite 510  
Washington, DC 20005  
*Counsel for Nelnet*

Richard L. Fruchterman, III  
Associate General Counsel  
Neustar, Inc.  
1775 Pennsylvania Avenue, NW  
4th Floor  
Washington, DC 20006  
*Counsel for Neustar*

Todd D. Daubert  
Dentons US LLP  
1301 K Street, NW  
East Tower, Suite 600  
Washington, DC 20005  
*Counsel for Nicor Energy Services  
Company*

Brian Melendez  
Dykema Gossett PLLC  
4000 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
*Counsel for Brian Melendez*

Stuart M. Richter  
Katten Muchin Rosenman LLP  
2029 Century Park East  
Suite 2600  
Los Angeles, CA 90067  
*Counsel for Business Financial  
Services, Inc.*

Seth L. Williams  
Marashlian & Donahue, LLC  
1420 Spring Hill Road  
Suite 401  
McLean, VA 22102  
*Counsel for Business Promotion, LLC*

Michele A. Shuster  
Mac Murray, Petersen & Shuster LLP  
6530 West Campus Oval  
Suite 210  
New Albany, OH 43054  
*Counsel for CallAssistant, LLC;  
CompliancePoint*

Michael B. Hazzard  
Arent Fox  
1717 K Street, NW  
Washington, DC 20006-5344  
*Counsel for Call-Em-All, LLC;  
CallFire, Inc.; Club Texting, Inc.;  
mobileStorm, Inc.; Twilio Inc.*

Jill Canfield  
NTCA  
VP – Legal & Industry  
4121 Wilson Boulevard  
Suite 1000  
Arlington, VA 22203  
*Counsel for NTCA-The Rural  
Broadband Association*

David H. Kramer  
Wilson Sonsini Goodrich & Rosati  
1301 Avenue of the Americas  
40th Floor  
New York, NY 10019-6022  
*Counsel for Path, Inc., Twitter,  
Inc.*

Marcus W. Trathen  
Brooks, Pierce, McLendon,  
Humphrey & Leonard, LLP  
Suite 1600  
Wells Fargo Capitol Center  
Post Office Box 1800  
Raleigh, NC 27602  
*Counsel for Pay Tel  
Communications, Inc.*

Jennifer Kashatus, Esq.  
DLA Piper LLP  
500 8th Street, NW  
Washington, DC 20004  
*Counsel for Philadelphia  
Consolidated Holding Company*

Karen L. Mayfield-Jones  
Evans & Dixon, LLC  
211 North Broadway, Suite 2500  
St. Louis, MO 63102  
*Counsel for Practice Recruiters,  
LLC and its agents*

Ky Tran-Trong  
Vice President, Regulatory Visa Inc.  
900 Metro Center Blvd  
Foster City, CA 94404  
*Counsel for Carl Holshouser, Sr.  
Director; Global Government  
Relations, Visa, Inc.*

Ian D. Volner  
Venable LLP  
575 Seventh Street NW  
Washington, DC 20004  
*Counsel for CBE Companies, Inc.;  
Direct Marketing Association*

Ronald M. Jacobs  
Venable LLP  
575 Seventh Street, NW  
Washington, DC 20004  
*Counsel for ccAdvertising*

Marion H. Little Jr.  
Zeiger, Tigges & Little LLP  
3500 Huntington Center  
41 South High Street  
Columbus, OH 43215  
*Counsel for CCI Investments, LLC;  
d/b/a CareWorks Consultants, Inc.*

Meredith Whipple  
One Farragut Square South, 1634 I St  
NW #1100  
Washington, DC 20006  
*Counsel for Center for Democracy &  
Technology; Common Cause*

Sheree L. Kelly  
Associate General Regulatory  
Counsel  
Law Department  
80 Park Plaza, T5G  
Newark, NJ 07102-4194  
*Counsel for Public Service  
Electric and Gas Company*

Richard W. Silbert  
VP and Associate General  
Counsel  
Purdue Pharma LP  
One Stamford Forum  
Stamford, CT 06901  
*Counsel for Purdue Pharma L.P.*

Brian Shank  
Evans & Dixon, LLC  
Metropolitan Square  
211 North Broadway  
Suite 2500  
Saint Louis, MO 63102  
*Counsel for Rehab Missouri, LLC,  
et al.*

Elizabeth L. Howard  
Sandler, Reiff, Young &  
Lamb, PC  
1025 Vermont Avenue, NW  
Suite 300  
Washington, DC 20005  
*Counsel for Revolution  
Messaging, LLC*

Kathryn Marie Krause  
Suite 250  
1099 New York Avenue, NW  
Washington, DC 20001  
*Counsel for CenturyLink*

Joseph E. Wolfson, Esquire  
620 Freedom Business Center  
Suite 200  
King of Prussia, PA 19406  
*Counsel for Cephalon, Inc.; Cephalon  
Clinical Partners, L.P.; Cephalon  
Development Corp.*

Marjorie Salem Hensel  
Chappell Roberts, Inc.  
100 South Ashley Drive  
Suite 500  
Tampa, FL 33602  
*Counsel for Chappell Roberts, Inc.*

Debra Brewer Hayes  
The Hayes Law Firm, PC  
700 Rockmead, Suite 210  
Kingwood, TX 77339  
*Counsel for Charles Clinton Hunter*

Paul Miller  
Miller/Wenhold Capitol Strategies,  
LLC  
3930 Walnut St #210  
Fairfax, VA 22030

Stephen D. Raber  
Williams & Connolly LLP  
725 Twelfth St., NW  
Washington, DC 20005  
*Counsel for Royal Canin U.S.A.,  
Inc.*

Joseph L. Oliva  
Oliva & Associates, ALC  
11770 Bernardo Plaza Court  
Suite 350  
San Diego, CA 92128  
*Counsel for Rubio's Restaurant,  
Inc.*

Claire Loehwing  
VP of Finance  
Sales Verification Company, LLC  
13100 56th Court #707  
Clearwater, FL 33760  
*Counsel for Sales Verification  
Company, LLC*

Burton D. Brillhart  
McGlinchey Stafford  
2711 N. Haskell Avenue,  
Suite 2750, LB 38  
Dallas, TX 75204  
*Counsel for Santander Consumer  
USA*

Anthony S. Mendoza  
Mendoza Law Office, LLC  
790 Cleveland Ave. S., Suite 206  
St. Paul, MN 55116  
*Counsel for SatCom Marketing,  
LLC*

Harrison Wadsworth III  
Executive Director of Coalition of  
Higher Education Assistance  
Organizations  
1101 Vermont Avenue NW Suite 400  
Washington, DC 20005-3586  
*Counsel for National Council of  
Higher Education Resources*

Bill Himpler  
Executive VP of American Financial  
Services Association  
919 18th St, NW, Suite 300  
Washington, DC 20006

Jeff Bloch  
Assoc. Gen. Counsel  
Consumer Bankers Association  
1225 Eye Street, NW, Suite 550  
Washington, DC 20005  
*Counsel for Consumer Bankers  
Association*

Anne Gross  
VP, Regulatory Affairs  
National Association of College and  
University Business Officers  
1110 Vermont Ave NW, Suite 800,  
Washington, DC 20005  
*Counsel for National Association of  
College and University Business  
Officers*

Andrew K. Soto  
VP Reg Affairs  
American Gas Association  
400 North Capitol St NW #450,  
Washington, DC 20001  
*Counsel for American Gas Association*

Curtis Hopfinger  
Director-Regulatory and Gov  
Affairs  
Securus Technologies, Inc.  
14651 Dallas Pkwy, 6th Floor  
Dallas, TX 75254  
*Counsel for Securus Technologies,  
Inc.*

Sen. Ed Markey  
255 Dirksen Senate Office Bldg  
Washington, DC 20510

Sen. Charles E. Schumer  
322 Hart Senate Office Bldg  
Washington, DC 20510

Sen. Ron Wyden  
221 Dirksen Senate Office Bldg  
Washington, DC 20002

Sen. Claire McCaskill  
506 Hart Senate Office Bldg  
Washington, DC 20510

Sen. Richard Blumenthal  
724 Hart Senate Office Bldg  
Washington, DC 20510

Sen. Elizabeth Warren  
317 Hart Senate Office Bldg  
Washington, DC 20510-2105

Sen. Amy Klobuchar  
302 Hart Senate Office Bldg  
Washington, DC 20510

Sen. Tammy Baldwin  
717 Hart Senate Office Bldg  
Washington, DC 20510-4906

Shelly Repp  
President, National Council of Higher  
Education Resources  
1100 Connecticut Ave. NW  
Suite 1200  
Washington, DC 20036-4110  
*Counsel for National Council of  
Higher Education Resources*

Winfield P. Crigler  
Exec. Director of Student Loan  
Servicing Alliance  
1850 M Street, NW  
Suite 920  
Washington, DC 20036  
*Counsel for Student Loan Servicing  
Alliance, SLSA Private Loan  
Committee (SLSA) PLC*

Michele A. Shuster  
Mac Murray, Petersen & Shuster LLP  
6530 West Campus Oval, Suite 210  
New Albany, OH 43054  
*Counsel for CallAssistant, LLC;  
Professional Association for Customer  
Engagement (PACE)*

Mary Brennan  
Clark County Collection Service  
Director of Operations  
8860 W. Sunset Rd.  
Las Vegas, NV 89148  
*Counsel for Clark County Collection  
Service, LLC*

Sen. Al Franken  
309 Hart Senate Office Bldg  
Washington, DC 20510

Sen. Jeff Merkley  
313 Hart Senate Office Bldg  
Washington, DC 20510

Alvin Velazquez  
Assistant General Counsel  
Service Employees International  
Union  
1800 Massachusetts Ave., NW  
Washington, DC 20036  
*Counsel for Service Employees  
International Union; CTW; CLC*

Nicholas W. Allard  
Patton Boggs LLP  
2550 M Street, NW  
Washington, DC 20037  
*Counsel for Silverlink  
Communications, Inc.*

Kacey L. Faughnan  
Wyatt, Tarrant & Combs, LLP  
1715 Aaron Brenner Drive  
Suite 800  
Memphis, TN 38120  
*Counsel for Smith & Nephew, Inc.*

William T. Green, III  
11 Greenway Plaza  
Suite 2820  
Houston, TX 77046  
*Counsel for Social UPS, LLC,  
Virtual Lending Source, LLC;  
Telnform, LLC*

Mary McManus  
Executive Director, Reg Affairs  
Comcast Corporation  
300 New Jersey Avenue, NW  
Suite 700  
Washington, DC 20001  
*Counsel for Comcast Corporation*

Charles S. Fiedler  
Nossaman LLP  
777 S. Figueroa Street, 34th Floor  
Los Angeles, CA 90017  
*Counsel for Competitive Health, Inc.*

Ali Sternburg  
Public Policy & Reg Counsel  
900 17th Street, NW  
Suite 1100  
Washington, DC 20006  
*Counsel for Computer &  
Communications Industry Association  
(CCIA)*

Congressman Scott R. Tipton  
218 Cannon House Office Building  
Washington, DC 20003

Harold Mordkofsky  
Blooston, Mordkofsky, Dickens, Duffy  
& Pendergrast LLP  
2120 L Street, NW  
Washington, DC 20037  
*Counsel for Consolidated Edison  
Company of New York, Inc.; Orange  
and Rockland Utilities*

Elizabeth Gray Nunez  
30 Ivan Allen, Jr. Blvd. NW  
Suite 700  
Atlanta, GA 30308  
*Counsel for Southern Company*

N. Martin Stringer  
McAfee & Taft  
1717 S. Boulder Ave.  
Suite 900  
Tulsa, OK 74119  
*Counsel for Stage Stores, Inc.*

Helgi C. Walker  
Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036-5306  
*Counsel for Staples Inc.; Quill Corporation*

Raymond J. Etcheverry  
Parsons Behle & Latimer  
201 S. Main St., Suite 1800  
Salt Lake City, Utah 84111  
*Counsel for Stericycle, Inc.*

Ronald J. Eisenberg  
Schultz & Associates LLP  
640 Cepi Drive, Suite A  
Chesterfield, MO 63005-1221  
*Counsel for Suzanne Degnen, D.M.D., P.C.*

Jill R. Rembusch  
Summers Compton Wells PC  
8909 Ladue Road  
St. Louis, MO 63124  
*Counsel for TechHealth, Inc.*

Kate Larson  
Regulatory Counsel  
Consumer Bankers Association  
1225 Eye Street NW, Suite 550  
Washington, DC 20005  
*Counsel for Consumer Bankers Association*

John K. Londot, Esq.  
Greenberg Traurig, PA  
101 East College Avenue  
Tallahassee, FL 32301  
*Counsel for Consumer Energy Solutions, Inc.*

Tim Marvin  
Consumers Union  
1101 17th Street NW #500  
Washington, DC 20036  
*Counsel for Consumers Union*

Gerald J. Waldron  
Covington & Burling LLP  
1201 Pennsylvania Avenue, NW  
Washington, DC 20004  
*Counsel for Covington & Burling LLP*

Scott Z. Zimmermann  
Law offices of Scott Z. Zimmerman  
601 S. Figueroa St. Suite 2610  
Los Angeles, CA 90017  
*Counsel for Craftwood Lumber Company, Edward Simon*



Thomas A. Roberts  
Barrasso Usdin Kupperman  
Freeman & Sarver, LLC  
909 Poydras Street  
24th Floor  
New Orleans, LA 70112  
*Counsel for Telecommunications  
Risk Management Association*

Aaron Foss  
President  
Telephone Science Corporation  
5507-10 Nesconset Highway  
Suite 201  
Mt. Sinai, NY 11766  
*Counsel for Telephone Science  
Corp.*

Jess Smith  
Sr. Manager Business Affairs  
The Marketing Arm – Wireless  
711 Third Avenue, 11th Floor  
New York, NY 10017  
*Counsel for The Marketing Arm –  
Wireless*

Matthew McCaffree  
Director of State Regulatory  
Relations  
The National Association of Water  
Companies  
2001 L St. NW  
Washington, DC 20036  
*Counsel for The National  
Association of Water Companies*

William B. Hayes  
257 Jackson Street  
Denver, CO 80206  
*Counsel for Creditsmarts Corp.; Grey  
House Publishing Inc; Park Surgical  
Company Inc; Saratoga Aesthetics  
LLC, Westfax, Inc.*

James C. Vlahakis  
Hinshaw & Culbertson LLP  
222 N. LaSalle Street  
Suite 300  
Chicago, IL 60601-1081  
*Counsel for Crown Mortgage  
Company*

Mitchell F. Brecher  
Greenberg Traurig, LLP  
2101 L street NW, Suite 1000  
Washington, DC 20037  
*Counsel for Crunch San Diego, LLC;  
TracFone Wireless, Inc.*

Krista L. Witanowski  
Assitant VP Reg. Affairs  
CTIA  
1400 16th Street, NW  
Suite 600  
Washington, DC 20036  
*Counsel for CTIA-The Wireless  
Association*

Frank E. Pasquesi  
Foley & Lardner LLP  
321 North Clark street, Suite 2800  
Chicago, IL 60654-5313  
*Counsel for CVS Health Corporation;  
Caremark, L.L.C.*

Gina Gregoletto  
The Results Companies  
100 NE Third Avenue  
Suite 200  
Fort Lauderdale, FL 33301  
*Counsel for The Results  
Companies, LLC*

Shawn A. Heller, Esq.  
Social Justice Law Collective, PL  
PO Box 70327  
Washington, DC 20024  
*Counsel for Timothy Blake*

Henry T. Kelly  
Counsel for Trading Advantage,  
LLC  
333 West Wacker Drive  
26th Floor  
Chicago, IL 60606  
*Counsel for Trading Advantage,  
LLC*

Kevin Rupy  
United States Telecom  
Association  
607 14th Street NW  
Suite 400  
Washington, DC 20005  
*Counsel for United States Telecom  
Association*

David J. Kaminski  
Carlson & Messer LLP  
5959 W. Century Boulevard, Suite  
1214  
Los Angeles, CA 90045  
*Counsel for David J. Kaminski*

Arthur W. Conqay  
President & CEO  
DialAmerica Marketing, Inc.  
960 Macarthur Boulevard  
Mahwah, NJ 07495  
*Counsel for DialAmerica Marketing,  
Inc.*

David L. Harsell  
McGuireWoods LLP  
77 W. Wacker Drive, Suite 4100  
Chicago, IL 60601-1818  
*Direct Energy Services, LLC; Direct  
Energy Business, LLC; Direct Energy,  
LP*

Becca Wahlquist  
Manatt, Phelps, & Phillips LLP  
11355 W. Olympic Blvd.  
Los Angeles, CA 90064  
*Counsel for DIRECTV, LLC*

William Baker  
Wiley Rein LLP  
1776 K Street, NW  
Washington, DC 20006  
*Counsel for Dominion Enterprises of  
Virginia General Partnership*

Steven A. Augustino  
Kelley Drye & Warren LLP  
3050 K Street, NW  
Suite 400  
Washington, DC 20007-5108  
*Counsel for United Stationers, Inc.; United Stationers Supply Co.; Lagasse, LLC*

Mark M. Miller  
Barnes & Thornburg, LLP  
One North Wacker Drive, Suite 4400  
Chicago, IL 60606  
*Counsel for USI, Inc.*

Stephen Hartzell  
Brooks, Pierce, McLendon LLP  
Wells Fargo Capitol Center  
Suite 1600  
150 Fayetteville Street  
Raleigh, NC 27602  
*Counsel for VAB, OAB, NCAB*

Ian Dillner  
Verizon  
1300 I Street, NW  
Suite 400 West  
Washington, DC 20005  
*Counsel for Verizon*

Andrew M. Schwartz  
Marshall Dennehey Warner  
Coleman and Goggin PC  
2000 Market Street, Suite 2300  
Philadelphia, PA 19103  
*Counsel for Versa Cardio, LLC*

Samuel L. Feder  
Jenner & Block LLP  
1099 New York Avenue NW  
Washington, DC 20001  
*Counsel for Douglas Walburg; Richie Enterprises, LLC; Futuredontics, Inc.; Futuredontics, Inc.; Nomax Inc.; SmartHealth, Inc.*

Yaron Dori  
Covington & Burling LLP  
1201 Pennsylvania Ave., NW  
Washington, DC 20004  
202 662-6000  
*Counsel for EatStreet, Inc.; Forest Pharmaceuticals; Gilead Sciences & Purdue Pharma; Portfolio Recovery Associates LLC; Unique Vacations, Inc.*

Scott Blake Harris  
Harris, Wiltshire & Grannis LLP  
1919 M Street  
Eighth Floor  
Washington, DC 20036  
*Counsel for Edison Electric Institute; American Gas Association; The Nielsen Company, U.S., LLC*

Jarret S. Cummings  
Director, Policy and External Relations  
Educase  
Washington, DC Office  
1150 18th Street, NW, Suite 900  
Washington, DC 20036  
*Counsel for EDUCAUSE*

Jennifer Bagg  
Harris, Wiltshire & Grannis LLP  
1919 M Street  
Eighth Floor  
Washington, DC 20036  
*Counsel for Vibes Media, LLC*

Henry Goldberg  
Goldberg, Godles, Wiener &  
Wright LLP  
1229 19th Street, NW  
Washington, DC 20036  
*Counsel for VoApps, Inc.*

Page Gardner,  
The Voter Participation Center  
1640 Rhode Island Avenue NW  
Suite 825  
Washington DC 20036  
*Counsel for Voter Participation  
Center*

Eileen M. Hunter  
Faegre Baker Daniels LLP  
90 S. 7th St.  
2200 Wells Fargo Center  
Minneapolis, MN 55402  
*Counsel for Esaote North  
America, Inc.; Solutions on Hold,  
LLC*

Tonia Ouellette Klausner  
Wilson Sonsini Goodrich & Rosati  
1301 Avenue of the Americas  
40th Floor  
New York, NY 10019-6022  
*Counsel for ExactTarget, Inc.*

Mac B. Greaves  
Jones Walker LLP  
1819 5th Avenue North, Suite 1100  
Birmingham, AL 35203  
*Counsel for Emily Sides Bonds*

Michele C. Farquhar  
Hogan Lovells US LLP  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004  
*Counsel for Encore Capital Group,  
Inc.*

Laura H. Phillips  
Drinker Biddle & Reath LLP  
1500 K Street, NW  
Washington, DC 20005-1209  
202 842-8800  
*Counsel for Endo, Exelon Corporation*

Charles S. Fieldler  
Nossaman LLP  
777 S. Figueroa Street, 34th Floor  
Los Angeles, CA 90017  
*Counsel for First Access, Inc.*

Brandon Kelly  
Fraud Officer  
FirstBank  
12345 W Colfax Ave  
Lakewood, CO 80215  
*Counsel for FirstBank*

Andrew J. Scavotto  
Stinson Leonard Street LLP  
7700 Forsyth Blvd, Suite 1100  
St. Louis, MO 63105  
*Counsel for Free Continuing Educ.  
Association, LLC d/b/a FCEA*

Rebecca J. Schwartz  
Shook, Hardy & Bacon LLP  
2555 Grand Blvd.  
Kansas City, MO 64108-2613  
*Counsel for Zoetis Inc., formerly  
known as Pfizer Animal Health;  
Zoetis LLC; Zoetis Prod.*

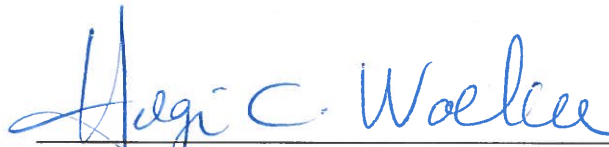
Paul E. Greenwalt  
Schiff Hardin LLP  
233 South Wacker Drive, Suite  
6600  
Chicago, IL 60606  
*Counsel for Francotyp-Postalia,  
Inc.*

Matthew J. Lang  
Gilead Sciences, Inc.  
Associate General Counsel  
333 Lakeside Drive  
Foster City, CA 94404  
*Counsel for Gilead Sciences, Inc.;  
Gilead Palo Alto, Inc.*

Jules Polonetsky  
Co-Chair and Director  
919 18th Street, NW Suite 901  
Washington, DC 20006  
*Counsel for Future of Privacy Forum*

Henry Pietrkowski  
Reed Smith LLP  
10 S. Wacker Dr.  
40th Floor  
Chicago, IL 60606  
*Counsel for GE Healthcare, Inc.; Salix  
Pharmaceuticals*

William E. Raney  
Copilevitz and Canter, LLC  
1900 L St NW #215  
Washington, DC 20036  
*Counsel for William E. Raney*



Helgi C. Walker  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Ave., N.W.  
Washington, D.C. 20036

*Counsel for the Chamber of Commerce of  
the United States of America*