COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Petition of the Kentucky Cable Telecommunications Association for a Declaratory Order that the Commission Has Jurisdiction to Regulate the Pole Attachment Rates, Terms, and Conditions of Cooperatives That Purchase Electricity from the Tennessee Valley Authority	)))))))	**Case No. 2012-00544**

KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S MOTION TO COMPEL THE TVA COOPERATIVES TO PRODUCE DOCUMENTS WITHHELD ON THE BASIS OF THE ATTORNEY-CLIENT PRIVILEGE AND DOCUMENTS RESPONSIVE TO KCTA'S SUPPLEMENTAL REQUEST FOR INFORMATION

Pursuant to Rule 37.01 of the Kentucky Rules of Civil Procedure, the Kentucky Cable Telecommunications Association ("KCTA") hereby moves the Kentucky Public Service Commission ("Commission") to compel Hickman-Fulton Counties Rural Electric Cooperative Corporation, Pennyrile Rural Electric Cooperative Cooperation, Tri-County Electric Membership Corporation, Warren Rural Electric Cooperative Corporation, and West Kentucky Rural Electric Cooperative Corporation (collectively the "TVA Cooperatives" or "Cooperatives") to produce documents responsive to KCTA's First Request for Information Numbers 1-2, 1-3, 1-5, and 1-8 that were withheld on the basis of attorney-client privilege and attorney work-product doctrine, as well as documents responsive to KCTA's Supplemental Request for Information as described below.

INTRODUCTION

KCTA requests an order from the Commission requiring the TVA Cooperatives to comply with their discovery obligations. To date, the Cooperatives have largely refused to respond to KCTA's requests for information and have dismissed KCTA's efforts to engage in

cooperative efforts to resolve discovery-related disputes. KCTA has no choice but to ask the Commission to compel the Cooperatives' production of documents and responses to specific requests.

First, the TVA Cooperatives have withheld documents that are responsive to KCTA's Requests for Information 1-2, 1-3, 1-5, and 1-8 on the basis that they are protected by the attorney-client and attorney-work-product privilege. Despite KCTA's request, the TVA Cooperatives have ignored their obligation to provide a privilege log to substantiate their claims of privilege. Thus the TVA Cooperatives have failed to meet their burden to demonstrate that the privilege and work-product protections apply to the documents they have withheld and the Commission should compel the Cooperatives to produce all such documents to KCTA.

Second, the TVA Cooperatives failed to produce relevant and discoverable documents and information in response to KCTA's Supplemental Requests for Information. The Cooperatives rely on meritless, boilerplate objections without offering any explanation for why KCTA's requests are irrelevant or overly broad, or why properly responding to KCTA's requests for documents commonly kept in the ordinary course of business would represent an undue burden. As has been the pattern throughout this case, the Cooperatives continue to make every effort to obstruct and hinder KCTA's right to discover relevant facts. KCTA's requests are specific and narrowly tailored to provide only the information it needs to rebut the Cooperatives' primary basis for its preemption argument – that Commission regulation of the Cooperatives' pole rates would allegedly interfere with the TVA's mandate to provide low retail electric rates to end users. KCTA is entitled to discovery that will show that Commission regulation of the Cooperatives' rates will not conflict with this mandate, meaning there is no conflict between federal and state law and no federal preemption.

Between December 30 and January 2, counsel for KCTA contacted counsel for the Cooperatives several times in an effort to resolve the issues presented in this motion. On January 2, counsel for the Cooperatives confirmed they would not provide any of the documents or information KCTA seeks.

BACKGROUND

KCTA filed its petition for declaratory ruling in December 2012, seeking a declaratory order affirming the Commission's exclusive and unquestioned jurisdiction to regulate pole attachment rates, terms, and conditions of the TVA Cooperatives. In its Response, the TVA Cooperatives have argued that federal law preempts the Commission's regulation of the TVA Cooperatives' pole attachment rates because Commission regulation would directly infringe on the TVA's effort to ensure that the TVA Cooperatives recover the full cost associated with the pole attachment so that no unfair burdens are placed on the electric ratepayers. The Cooperatives have made conflict preemption an issue in this case, and KCTA is entitled to discovery to rebut it.

Throughout the discovery process, the TVA Cooperatives have consistently provided non-responsive and incomplete answers to KCTA's requests for information. In their responses to KCTA's Supplemental Requests for Information, the Cooperatives continue to refuse to provide documents and information that are clearly relevant to this proceeding. The Cooperatives have flagrantly ignored their discovery obligations under their theory that no discovery is required because the issue is a question of law. But the Commission has already rejected this argument and ordered discovery in this matter. Notwithstanding the Cooperatives' lack of interest in producing this information, they are required to do so. The Cooperatives'

pattern of withholding relevant information will undoubtedly continue without the Commission's intervention.

ARGUMENT

I. The TVA Cooperatives Have Failed to Meet Their Burden to Show that the Attorney-Client Privilege and/or Attorney Work-Product Doctrine Apply to Documents Responsive to KCTA's First Requests for Information 1-2, 1-3, 1-5, and 1-8.

In its First Request for Information, KCTA submitted the following Requests to the TVA Cooperatives:

> 1-2 If [you contend that the TVA regulates your pole rates in any way], please explain fully, making reference to all facts known to you supporting that answer.
>
> 1-3 Provide the legal and factual basis for the statement on page 7 of the TVA Cooperatives' Response to the January 17 Order, filed with the Commission on February 15, 2013, that states: "The cost-based rates the TVA Cooperatives collect in connection with the pole attachment services they provide directly impact the end-users' retail rates which are set by the TVA."
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> 1-5 [If you contend that regulation of your pole attachment rates according to the cost-based rate methodology used by the Commission would conflict with the TVA's regulation of your electric rates], please explain fully, making reference to all facts known to you supporting that answer.
>
> 1-8 [If you contend that the TVA has statutory jurisdiction to regulate pole attachment rates of its member cooperatives,] please explain fully, giving all statutory reference and case citations in support of your answer.

In their responses, the TVA Cooperatives objected to the Requests, in part, because they called for information "protected by the attorney-client and attorney-work-product privileges." The TVA Cooperatives did not provide a privilege log, nor did they object to KCTA's Instruction which asked the Cooperatives to "describe the factual basis for your claim of privilege in sufficient detail to permit adjudication of the validity of that claim."

On November 25, KCTA sent a letter to counsel for the TVA Cooperatives, asking that, to the extent the TVA Cooperatives had withheld documents on the basis of privilege, they provide KCTA with a privilege log detailing the basis of their objections no later than December 2. (*See* Exhibit A.) Later that day, counsel for the Cooperatives responded: "Thanksgiving is this weekend. We will aim to get back to you next week." (*See* Exhibit B.) In a letter dated December 5, counsel for the Cooperatives wrote:

> Parties to proceedings before the [Commission] are not bound by the instructions included in the data requests propounded upon them by adverse parties. Additionally, no Commission regulation, order, or other authority requires the production of a privilege log when withholding documents on the grounds of a recognized privilege. Because of the undue time and expense that would be involved in cataloguing the numerous attorney-client communications, drafts of pleadings, attorney workpapers, and other materials withheld on the grounds of recognized privileges, the TVA Cooperatives decline to provide a privilege log to KCTA.

(*See* Exhibit C.) Counsel for KCTA responded on December 17, noting that the use of privilege logs in proceedings before the Commission is common, and also reminding the Cooperatives that the burden is on them to justify their claims of privilege. KCTA asked the Cooperatives to provide a privilege log by December 23. (*See* Exhibit D.) On December 30, KCTA asked counsel for the Cooperatives if they would provide a privilege log. Counsel for the Cooperatives responded on January 2, confirming they would not provide a privilege log.

Kentucky Rule of Civil Procedure 26.02(1) provides that "[p]arties may obtain discovery regarding any matter not privileged which is relevant to the subject matter involved in the pending action." CR 26.02(1). The party asserting a privilege *must prove its applicability. Haney v. Yates*, 40 S.W.3d 352, 355 (Ky. 2001) (citing *Sisters of Charity Health Sys. v. Raikes*, 984 S.W.2d 464, 469 (Ky. 1998); *Shobe v. EPI Corp.*, 815 S.W.2d 395 (Ky. 1991); Robert G. Lawson, The Kentucky Evidence Law Handbook, § 5.05, p. 229 (3d ed. Michie 1993); *see also*

In the Matter of 2012 Integrated Resource Plan of East Kentucky Power Cooperative, Inc., Case No. 2012-00149, Dec. 4, 2012 Order (ordering cooperative to produce documents because cooperative "provided no justification for asserting the attorney-client privilege and the attorney-work-product doctrine"); *In the Matter of Joint Application of Duke Energy Corp.*, Case No. 2005-00228, Sept. 27, 2005 Order (ordering Duke Energy to produce documents because it "failed to carry its burden to demonstrate" that the documents were privileged). "Privileges must be strictly construed because they contravene the fundamental principle that 'the public has a right to every man's evidence.'" *Haney*, 40 S.W.2d at 355 (quoting *Sisters of Charity Health Sys.*, 984 S.W.2d at 468). In other words, "broad claims of privilege are disfavored when balanced against the need for litigants to have access to relevant or material evidence." *Id.* (citing *Meenach v. General Motors Corp.*, 891 S.W.2d 398, 402 (1995)).

Kentucky Rule of Evidence 503 provides that attorney-client privilege only applies to a "confidential communication made to facilitate the client in his/her legal dilemma and made between two of the four parties listed in [Kentucky Rule of Evidence 503(b)] – the client, the client's representatives, the lawyer, or the lawyer's representatives." *Haney*, 40 S.W.3d at 354 (citing KRE 503)). Kentucky Rule of Evidence 503 further provides that a "communication is 'confidential' if it is not intended to be disclosed to third parties other than those to whom disclosure is made in furtherance of the rendition of professional legal services to the client or those reasonably necessary for the transmission of the communication." KRE 503(a)(5).

The TVA Cooperatives have "declined" to articulate any basis for their claims of attorney-client privilege and attorney work-product protection over the documents they withheld in response to KCTA's Requests 1-2, 1-3, 1-5, and 1-8, even though the burden lies with them to do so. Additionally, the Cooperatives' counsel stated they would not provide a privilege log

because KCTA's Requests 1,2, 1-3, 1-5, and 1-8 "do not request any tangible thing," but rather mental impressions of counsel. The Cooperatives' counsel's interpretation of KCTA's requests is far too narrow. KCTA is not asking the Cooperatives to provide a privilege log to justify the withholding of counsel's mental impressions. Rather, to the extent the Cooperatives have withheld documents based on attorney-client privilege and work product doctrine – and in their December 5 correspondence, counsel for the Cooperatives acknowledged the existence of "numerous" documents that have been withheld on the basis of privilege – KCTA is entitled to review a privilege log to examine the basis of that claim. Additionally, Instruction 4(d) of KCTA's First Requests for Information and Supplemental Request for Information state that the term "explain . . . when used when used with respect to a fact . . . shall mean to provide the complete and full details . . . concerning such fact . . . including the identity . . . of all documents, communications, and persons that reflect, refer, relate, evidence, or pertain in any way to such fact." *See* KCTA's Supplemental Requests for Information to TVA Cooperatives Instruction 4(d) (Dec. 2, 2013); KCTA's First Requests for Information to TVA Cooperatives Instruction 4(d) (Oct. 24, 2013). Thus, contrary to the Cooperatives' counsel's impression, KCTA's Requests 1-2, 1-3, 1-5, and 1-8 seek the production of documents.

Notably, the Cooperatives not only failed to object to KCTA's instruction to provide a privilege log, they asked KCTA to provide a log to explain the basis of any claims of privilege in its responses to the TVA Cooperatives. *See* The TVA Cooperatives' Second Data Requests to KCTA, Instruction 1 (Dec. 2, 2013); The TVA Cooperatives' First Data Requests to KCTA, Instruction 1 (Oct. 24, 2013). This is hardly consistent with the Cooperatives' current argument that parties appearing before the Commission are not required to explain the basis of their claims of privilege.

KCTA deserves an opportunity to thoroughly examine the basis of the TVA Cooperatives' claims of privilege over the documents they have withheld from production. To date, the Cooperatives have failed to clearly articulate the specific basis for their argument that federal law preempts the Commission's exclusive and unquestioned authority to regulate pole attachment rates. KCTA's Requests 1-2, 1-3, 1-5, and 1-8 are relevant and important because they seek information from the Cooperatives that would explain the basis for their preemption arguments. Because the Cooperatives have not met their burden of establishing privilege and/or work-product protection for the documents they withheld form production, the Commission should compel the prompt production of the responsive documents.

II. The Commission Should Order the TVA Cooperatives to Produce Responses and Documents Responsive to KCTA's Supplemental Request for Information.

Kentucky Rule of Civil Procedure 26.02(1) provides that "[p]arties may obtain discovery regarding any matter not privileged which is relevant to the subject matter involved in the pending action." CR 26.02(1). It is not necessary that the information sought be admissible as competent evidence for trial. *Id.*; *see also Ewing v. May*, 705 S.W.2d 910, 912 (Ky. 1986). "Even though it might be otherwise incompetent and inadmissible, information may be elicited if it appears reasonably calculated to lead to the discovery of admissible evidence." *Ewing*, 705 S.W.2d at 912; *see also* Ky. R. Evid. 401 ("'Relevant evidence' means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.")

A. All Pole Attachment Agreements, Joint Use Agreements, and Pole License Agreements Between the TVA Cooperatives and All Pole Users. [1]

KCTA seeks all pole attachment agreements between the TVA Cooperatives and all pole users dating back to 1937. The Cooperatives objected to this request as "not reasonably calculated to lead to the discovery of admissible evidence" and "overly broad and unduly burdensome." The Cooperatives referred to answers produced in response to KCTA's First Request for Information, which incorporate the 2010 Joint Use Agreement between the TVPPA and AT&T and the Cooperatives' respective contracts with TVA. These answers are non-responsive and incomplete.

The pole attachment agreements – for all users – bear directly on the single issue in this case. Specifically, the Cooperatives contend that the TVA's regulation of their retail electric rates extends to the regulation of their pole attachment rates. To support this argument, the Cooperatives rely on the theory that Commission regulation of their pole rates would interfere with the TVA's requirement that the Cooperatives ensure full cost recovery to prevent subsidies to the attaching entities. Thus KCTA is entitled to review all terms, rates, and conditions contained in the agreements between the Cooperatives and each pole user to determine whether the agreements provide for rates that ensure full cost recovery and to compare pole rates and track changes in rates among the different agreements. Additionally, if the Cooperatives entered these contracts without TVA's knowledge and approval, it rebuts their argument that the TVA has any role in regulation of their pole attachment rates.

[1] KCTA sought this information in Request 2-1 to West Kentucky Rural Electric Cooperative Corporation; Request 2-1 to Warren Rural Electric Cooperative Corporation; Request 2-1 to Pennyrile Rural Electric Cooperative Corporation; Request 2-1 to Tri-County Electric Membership Corporation; and Request 2-2 to Hickman-Fulton Counties Rural Electric Cooperative Corporation.

In addition to their relevance objections, the Cooperatives also argue that production of the pole attachment agreements is "overly broad and unduly burdensome." These objections also lack merit. The agreements KCTA requested are typically long-term, meaning the number of contracts is likely small. Additionally, these are documents that are typically maintained in the ordinary course of business, and are easily accessible. The Cooperatives have not, and cannot, demonstrate that production of these documents creates an undue burden. Furthermore, KCTA's efforts to discuss the basis of the Cooperatives' objections on these bases have simply been rebuffed.

Tri-County Electric Membership Corporation produced recent amendments to many, if not all, of its pole attachment agreements with several pole users in response to KCTA's First Request for Information. This runs counter to the TVA Cooperatives' argument that this information is not relevant to the issue in this proceeding, and that KCTA's request is overbroad and burdensome.

B. Pole Rates Charged to an ILEC and a Cable Entity for Each of the Last Ten Years.[2]

KCTA seeks the pole attachment rates each Cooperative charged to Incumbent Local Exchange Carriers ("ILECs") and cable companies for the last ten years. The Cooperatives objected to this request as "not reasonably calculated to lead to the discovery of admissible evidence" and "overly broad and unduly burdensome." The Cooperatives also referred to answers they produced in response to KCTA's First Request for Information, which provided the

[2] KCTA sought this information in Request 2-42 to West Kentucky Rural Electric Cooperative Corporation; Request 2-41 to Warren Rural Electric Cooperative Corporation; Request 2-43 to Pennyrile Rural Electric Cooperative Corporation; Request 2-43 to Tri-County Electric Membership Corporation; and Request 2-42 to Hickman-Fulton Counties Rural Electric Cooperative Corporation.

pole attachment rates for the last four years for Hickman-Fulton, West Kentucky, and Warren and pole attachment rates for 2009, 2010, 2011, and 2012 for Tri-County. Pennyrile has never provided any specific pole attachment rates, but has said that it charges all entities the rates provided in the 2010 Joint Use Agreement between TVPPA and AT&T. The Cooperatives responses to this request are inadequate and incomplete.

The pole attachment rates, like the agreements that govern them, are relevant to this case because any adjustment in the pole attachment rate that the Cooperatives implemented without the TVA's knowledge or approval rebuts the Cooperatives' argument that the TVA regulates their pole rates. KCTA needs ten years of rates to see the full trend in the rate adjustments, and KCTA also seeks the rates for ILECs and cable companies because they are all relevant, and to the extent that they vary, it demonstrates that the TVA neither regulates nor gives attention to those rates.

KCTA's request is neither "overly broad" nor "unduly burdensome." KCTA's request is narrow and specific and the Cooperatives can easily produce the information in summary form.

C. Invoices for Pole Attachment Fees Sent to All Pole Attachers for Each of the Past Three Years.[3]

KCTA seeks the invoices the Cooperatives sent to all pole attachers for pole attachment fees for the last three years. The Cooperatives objected to this request as "not reasonably calculated to lead to the discovery of admissible evidence" and "overly broad and unduly burdensome."

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[3] KCTA sought this information in Request 2-35 to West Kentucky Rural Electric Cooperative Corporation; Request 2-36 to Pennyrile Rural Electric Cooperative Corporation; Request 2-36 to Tri-County Electric Membership Corporation; and Request 2-35 to Hickman-Fulton Counties Rural Electric Cooperative Corporation. Warren Rural Electric Cooperative Corporation produced its invoices in response to KCTA's First Request for Information.

The Cooperatives' invoices are relevant to show the actual pole fees for which the Cooperatives billed pole attachers. The Cooperatives argue that their rates are cost-based, and their expressions of concern regarding cost recovery are their primary basis for their assertion that the TVA regulates their pole rates. KCTA is entitled to test that assertion by reviewing the pole rental charges for which the Cooperatives actually billed pole attachers.

KCTA's request for invoices for only the past three years is neither overly broad nor unduly burdensome. Again, KCTA has narrowly tailored its request to a specific timeframe, and these invoices, routinely kept in the ordinary course of business, are not onerous to locate and produce.

Notably, the Cooperatives' objections to this request ring hollow in light of Warren Rural Electric Cooperative Corporation's production of its invoices in response to KCTA's First Request for Production.

D. Total Pole Attachment Revenue Received from Licensee Attachers for Each of the Years 2008 to the Present. [4]

KCTA seeks the pole attachment revenue the Cooperatives received from its licensee attachers for each of the years 2008 to the present. The Cooperatives again argue, without explanation, that this request is "not reasonably calculated to lead to the discovery of admissible evidence" and is "overly broad and unduly burdensome."

In *Ballard Rural Telephone Cooperative Corp. Inc. v. Jackson Purchase Energy Corp.*, No. 2004-00036, the Commission decided that, while it has jurisdiction over pole attachments

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[4] KCTA sought this information in Request 2-34 to West Kentucky Rural Electric Cooperative Corporation; Request 2-34 to Warren Rural Electric Cooperative Corporation; Request 2-35 to Pennyrile Rural Electric Cooperative Corporation; Request 2-35 to Tri-County Electric Membership Corporation; and Request 2-34 to Hickman-Fulton Counties Rural Electric Cooperative Corporation.

provided by joint users, it would not set a formula for the rates or otherwise determine the terms of service between joint users. Thus the revenue the Cooperatives receive from its attachments for joint users would not necessarily be affected by the Commission's exercise of its jurisdiction over the Cooperatives' pole attachment rates. Rather, to determine the effect of the Commission's exercise of its jurisdiction over the Cooperatives' pole attachment rates, KCTA must look only at the revenue from licensee attachers to determine if the Commission's rate methodology would ensure cost recovery.

The Cooperatives' objections to producing this information are baseless and unsubstantiated. KCTA's request for the Cooperatives' revenue from licensee attachers for each of the years 2008 to present is, like KCTA's others requests, a simple matter of collecting information routinely maintained and producing it to KCTA in summary form.

E. "Surplus Revenues" as Defined in Paragraph 6(b) of the TVA Contract for Each of the Last Five Years.[5]

KCTA seeks the "surplus revenues" as defined in Paragraph 6(b) of each Cooperatives' contract with the TVA. The Cooperatives objected to this request based on relevance, overbreadth, and undue burden.

KCTA is entitled to the Cooperatives' surplus revenues to demonstrate that Commission regulation of the Cooperatives' pole attachment rates would not result in any subsidy that would ultimately be recovered through higher retail electric rates as the TVA Cooperatives contend.

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[5] KCTA sought this information in Request 2-10 to West Kentucky Rural Electric Cooperative Corporation; Request 2-10 to Warren Rural Electric Cooperative Corporation; Request 2-11 to Pennyrile Rural Electric Cooperative Corporation; and Request 2-11 to Tri-County Electric Membership Corporation. KCTA did not request this information from Hickman-Fulton Counties Rural Electric Cooperative Corporation because it did not have Hickman-Fulton's TVA Contract.

Rather, the "surplus revenues" will likely demonstrate that the Cooperatives are operating with a substantial margin.

The Cooperatives' objections based on overbreadth and undue burden are also unavailing. Paragraph 6(b) of the contract between the Cooperatives and the TVA specifically defines this "surplus revenue" and describes for what purposes the Cooperatives may use "surplus revenue." The Cooperatives have failed to articulate how this request is overbroad, and it is disingenuous for the Cooperatives to suggest that they do not track this information such that providing it would amount to an undue burden.

F. The Identity of any TVA Representatives Who May Testify on Behalf of the TVA Cooperatives.[6]

KCTA asked the TVA Cooperatives whether they, or their representatives, have discussed with the TVA the possibility that someone from the TVA may testify on the Cooperatives' behalf, and if so, identify the TVA representative who might testify. The Cooperatives objected to these Requests on the grounds that they are "not reasonably calculated to lead to the discovery of relevant and admissible evidence" and because they are "premature in light of the fact that discovery is ongoing and no decision regarding potential witnesses has been made."

First, the TVA Cooperatives cannot argue in good faith that this request is irrelevant because their primary theory for preemption is based on the TVA's regulation of their pole attachment rates. KCTA is entitled to know whether the Cooperatives have discussed with the

[6] KCTA sought this information in Request 2-55/56 to West Kentucky Rural Electric Cooperative Corporation; Request 2-51/52 to Warren Rural Electric Cooperative Corporation; Request 2-53/54 to Pennyrile Rural Electric Cooperative Corporation; Request 2-53/54 to Tri-County Electric Membership Corporation; and Request 2-52/53 to Hickman-Fulton Counties Rural Electric Cooperative Corporation.

TVA any possible testimony in this case and the identity of any TVA representatives who may testify on the Cooperatives' behalf, and their relevance objection is baseless and obstructive.

Second, the Commission's Scheduling Order, filed on October 10, 2013, states that "Notices of Depositions shall be filed no later than January 15, 2014." KCTA needs the names of the TVA Cooperatives' potential witnesses from the TVA before this deadline to set its deposition list.

CONCLUSION

For the reasons stated above, KCTA asks the Commission to compel the TVA Cooperatives to produce documents responsive to KCTA's First Request for Information Numbers 1-2, 1-3, 1-5, and 1-8 that were wrongly withheld on the basis of attorney-client privilege and attorney work-product doctrine, as well as documents and responses responsive to KCTA's Supplemental Request for Information as described above.

Respectfully submitted,

_/s/Laurence J. Zielke__

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Kentucky Cable Telecommunications Association's Motion to Compel the TVA Cooperatives to Produce Documents Withheld on the Basis of the Attorney-Client Privilege and Documents Responsive to KCTA's Supplemental Request for Information has been served on all parties of record via hand delivery, facsimile, or electronically this 2nd day of January, 2014.

_/s/Laurence J. Zielke__

Laurence J. Zielke