

Decision No. C03-0415

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

DOCKET NO. 02D-451T

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IN THE MATTER OF THE PETITION OF MCI WORLDCOM COMMUNICATIONS, INC.,  
FOR A DECLARATORY ORDER.

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**ORDER DENYING EXCEPTIONS**

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Mailed Date: April 22, 2003  
Adopted Date: April 9, 2003

**I. BY THE COMMISSION**

**A. Statement**

1. This matter comes before the Commission for exceptions to Recommended Decision No. R03-0088 filed by MCI WorldCom Communications, Inc. (MCI), on February 12, 2003. Generally, MCI excepts to the administrative law judge's (ALJ) findings that the Commission possesses jurisdiction over the services MCI provides to the Colorado Department of Corrections (DOC) pursuant to a contract between the two parties.

2. MCI contends that the Colorado Inmate Phone System (CIPS) does not fall under the category of non-optional operator services, because the calls could be technically completed without the synthesized voice intercepts currently in use with the system. Further, MCI argues that even with the two intercept messages, CIPS is not providing regulated operator services because inmates are not required to use an operator to complete calls. MCI also argues that the ALJ's findings, if upheld will hinder the DOC's administration, management, and oversight of inmates, which would make it a party to this and any follow-on Commission proceedings.

3. The per call charges and higher rates for collect calls made by inmates are, according to MCI, necessary because of the costs of the increased enhancements provided by the current inmate telephone system.

4. Now, being duly advised in the matter, we deny MCI's exceptions consistent with the discussion below.

## **II. BACKGROUND**

5. On August 27, 2002, MCI filed a Petition for Declaratory Order (Petition) with the Commission pursuant to 4 *Code of Colorado Regulations* (CCR) 723-1-60, seeking a determination that telecommunications services for inmates provisioned by MCI under its contract with the DOC are neither operator services, nor nonoptional operator services, and they are not subject to Commission rules. The Colorado Office of Consumer Counsel (OCC) and Commission Staff (Staff) (collectively with MCI, the Parties) filed timely interventions.

6. On October 25, 2002, the Parties filed a Stipulated Motion for Briefing Schedule, whereby the Parties agreed that since there were no disputed material facts, this matter should be submitted to the Commission on briefs, and requested that the hearing and procedural schedule be vacated. The stipulation was granted and the matter determined by the ALJ on the filed briefs.

7. The ALJ determined that this matter met the requirements of Rule 56 of the Colorado Rules of Civil Procedure which contains the standard for summary judgment. Rule 56 provides that "[t]he judgment sought shall be rendered forthwith if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits filed, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." Finding that this matter met the Rule 56 standard because no

genuine issue existed as to any material fact, and because the issues to be determined were strictly legal, the ALJ found that deciding this matter on the briefs was appropriate. The facts as articulated by the Parties in the briefs filed in this matter are set forth in the Recommended Decision.

### **III. RECOMMENDED DECISION**

#### **A. Undisputed Facts**

8. On November 1, 2001, MCI entered into a contract with the DOC. In relevant part, the agreement required MCI to provide telephone services to inmates incarcerated in Colorado penal institutions. The initial term of the contract was for three years and could be extended at the option of the DOC and MCI. The contract contains both the rates to be paid to MCI for calls and the commissions to be paid to the DOC by MCI.

9. The system developed by MCI for the DOC is known as the Colorado Inmate Phone System (CIPS). The CIPS functionalities and features are processed through a system known as the VAC System 100. This system replaced a previous inmate phone system known as the SAFEBLOCK system which was provided by Sprint Communications Company, L.P. (Sprint) under contract with the DOC.

10. CIPS is a controlled calling system, created to DOC specifications, that contains features that allows the DOC to have complete control over inmate use of the telephones and restrict the telephone numbers that an inmate can call. CIPS also allows the DOC to control the duration of inmate calls and set parameters on calls placed by inmates. With CIPS, the DOC can establish both standard and customized hours of operation for inmate telephone usage. To have access to CIPS, an inmate is required to have a CIPS account and a ten-digit Personal Identification Number (PIN).

11. Because DOC regulations do not allow an inmate to possess cash or coins, an inmate is precluded from using coins to place a telephone call. CIPS provides two options to complete a telephone call (other than a call to an attorney): 1) a debit option; and 2) a collect call option.

12. To utilize the debit option, an inmate must purchase blocks of time at the institution's canteen from the inmate's bank account. The correctional facility then forwards the purchase information to the CIPS administrative office in Cañon City. The purchase information is entered into CIPS, which applies the deposits to the inmate's account. When an inmate places a debit option call, CIPS automatically deducts the charge for the call from the balance in the inmate's account. No telephone card is used to place debit option calls. Inmates receive a monthly statement showing the activity in their CIPS account

13. When placing a debit call, an inmate must enter a PIN number, enter the speed dial number to be called, and then, following a synthesized voice prompt, push 1 for a debit call. CIPS confirms that the inmate has sufficient funds to place a call of at least three minutes' duration. CIPS then places the call and a synthesized voice informs the called party that he or she is receiving a prepaid call from an inmate at a Colorado State Correctional Facility. The synthesized voice then instructs the called party to push 5 to accept the call and wait for connection, or hang up to refuse the call.

14. When placing a collect call, the inmate must push 2, then CIPS confirms that the number being called is approved to accept collect calls. Upon confirmation that the number is approved, CIPS places the call and informs the person answering the phone that the called party has a collect call from an inmate at a Colorado State Correctional Facility. The called party then

has the option to hear the cost of the call. If the called party wishes to accept the call, the called party then pushes 7. To refuse the call, the called party is instructed to hang up.

15. All prompts provided by CIPS during inmate calls, whether a debit or collect call, are recordings, computer-voice interactions, or synthesized voices. No live operators are utilized in placing or connecting calls with CIPS.

16. Under the terms of the contract, MCI provides the software and equipment necessary to operate CIPS. Qwest Corporation, or one of its affiliates, owns the coinless telephone instruments used by the inmates, as well as the switches that route the inmates' calls. According to the contract, the DOC receives a 27 percent commission on revenue derived from all calls whether they are collect or debit calls. As required by state law, the DOC deposits these commissions directly into the Canteen, Vending Machine, and Library Trust Fund. *See* §17-20-127, C.R.S.

**B. Operator Assisted Calls**

17. The first issue addressed by the ALJ was whether the inmate services provided by MCI were operator services as defined by § 40-15-102(20), C.R.S. That statute, in relevant part, defines operator services as “services ... provided by ... the use of recordings or computer-voice interaction to enable customers to receive individualized and select telephone call processing or specialized or alternative billing functions. ‘Operator services’ include nonoptional operator services ...” *Id.*

18. Based on the facts submitted, the ALJ, in a five-part analysis, found that CIPS meets the statutory definition of operator services. First, the ALJ determined that although the term “customer” is not defined by statute, Commission Rule 4 CCR 723-18-6.4 defines customer

as the “person who will be billed for the call.” In the context of § 40-15-102(20), C.R.S., and this proceeding, the ALJ found that a customer is the person who will be billed for the call. With a debit call the customer is the inmate; with a collect call, the customer is the person who receives (and agrees to pay for) the call.

19. Second, the ALJ found that with the CIPS system, the customer (whether a debit or collect call) cannot complete the call without the use of recordings or computer-voice interaction.

20. Third, because the customer must use recordings or synthesized voice interaction to connect a call and authorize the manner of payment, the customer “receives individualized and select telephone call processing,” pursuant to § 40-15-102(20), C.R.S.

21. Fourth, relying on our Decision No. C01-223 issued in Docket No. 00R-285T discussing the history of deregulation and subsequent re-regulation of nonoptional operator services, the ALJ determined that it was the General Assembly’s intent that the Commission regulate rates and charges for inmate telephone service.

22. Finally, the ALJ found to be informative language in DOC Administrative Regulation No. 850-12 that states that “[c]ollect calls will be charged at the current rate for operator assisted calls.” This language persuaded the ALJ that the DOC appears to consider collect calls to be operator-assisted calls.

### **C. Powell Case**

23. MCI argued that CIPS is in all respects comparable to the SAFEBLOCK system previously provided by Sprint. MCI asserts that the synthesized voice interactions required to complete an inmate call are options requested by the DOC and therefore are not required for

CIPS to function properly. As such, MCI concludes that, since SAFEBLOCK was found not to be an operator service, CIPS also should be found not to be an operator service.

24. In Decision Nos. R96-51 and C96-457 in the matter of *Powell et al. v. Colorado Inmate Phone System et al.*, in Docket Nos. 93F-547T and 93F-667T, the Commission found that SAFEBLOCK did not fall within the definition of operator services because SAFEBLOCK did not use live operators or recordings or computer voice interaction. Rather, SAFEBLOCK allowed an inmate to enter a pre-programmed speed dial number and a prepaid account number with no interaction whatsoever. In those decisions, the Commission determined that in order to be considered an operator service, SAFEBLOCK would have to require the use of live operators, recording, or computer voice interaction.

25. In *Powell v. Colorado Public Utilities Commission*, 956 P.2d 608 (Colo. 1998), the supreme court upheld the Commission's decisions, finding that the services provided by SAFEBLOCK did not meet the statutory definition of nonoptional operator services because it did not utilize operators, live or recorded, in its operation. *Id.* at 615.

#### **D. Nonoptional Operator Service**

26. The ALJ distinguished *Powell* from the instant case, finding that CIPS is different than SAFEBLOCK in that the use of an operator is required to place a call using CIPS. The ALJ held that CIPS is an operator service.

27. Having determined that CIPS did indeed constitute operator services, the ALJ next addressed whether CIPS falls within the definition of nonoptional operator services. Section 40-15-102(19.5), C.R.S., defines nonoptional operator service as “operator services to

provide telephone service to inmates at penal institutions.” Based on the undisputed facts, the ALJ found that CIPS meets the statutory definition of nonoptional operator services.

28. Commission Rule 4 CCR 723-18-3.1.3 provides a definition of nonoptional operator services: “[c]alls made by inmates at penal institutions or other correctional facilities [a] who are not permitted to use coins when placing calls at coin operated or coinless telephones or [b] who are required to use an operator’s services to complete a call because of the rules or regulations of said institution’s facilities.” The ALJ found the first prong of the rule met here, since the DOC does not permit inmates to use coins to place calls. The ALJ also found the second prong of the rule met because CIPS requires that inmates use an operator’s services to complete a call.

29. The ALJ noted that the terms “an operator’s services” in the rule definition of nonoptional operator services includes the use of recordings, computer-voice interaction, and synthesized voices, and does not require the use of a live operator. According to the ALJ, this interpretation reconciles the language of 4 CCR 723-18-3.1.3, § 40-15-102(20), C.R.S., and 4 CCR 723-18-3.2.

30. In referring to *Powell*, the ALJ found that determining that CIPS provides nonoptional operator services achieves the purpose underlying regulation of those services. This is in line with the reasoning in *Powell*, where the court stated that “[g]enerally, operator assisted calls cost more than direct dial calls. Thus it makes sense to regulate the cost of this service where it is nonoptional to a customer.” *Powell*, 956 P.2d at 615. The ALJ found that CIPS utilizes a nonoptional operator service to complete inmate calls. The charge for the CIPS calls is higher than the charge for direct dial calls.



31. The ALJ determined that Commission jurisdiction over nonoptional operator services and the prices to be charged for those services through CIPS does not hinder or circumscribe in any way the DOC's administration, management, supervision, and control of penal institutions. MCI, not the DOC, is the regulated entity which must abide by the Commission's jurisdiction, the ALJ ruled.

32. The ALJ also addressed MCI's contention that CIPS is exempt from Commission regulation because it is a debit card as defined in Rule 4 CCR 723-18-2.6. According to the ALJ, pursuant to 4 CCR 723-18-4.1.5, debit cards are optional operator services. Under § 40-15-401(1)(j), C.R.S., optional operator services are exempt from regulation. Reading these rules and the statute together, the ALJ concluded that CIPS is not a debit card. Because CIPS is nonoptional operator service, by definition it cannot be an optional operator service. Further, Rule 18-2.6 makes clear that a debit *card* must be utilized, until the value of the *card* is exhausted. However, CIPS processes all calls electronically. An inmate never possesses a card, therefore, CIPS is not exempt from regulation as a debit card.

33. Finally, the ALJ addressed MCI's contention (relying on *Powell*) that because CIPS is customer premises equipment, it is deregulated by federal law and is exempt from Commission regulation. The ALJ found MCI's reliance on *Powell* and on the similarities between CIPS and SAFEBLOCK misplaced. Because CIPS falls within the definition of nonoptional operator services and is more than a PBX (unlike SAFEBLOCK, which the ALJ there found to be nothing more than a sophisticated PBX, because SAFEBLOCK was neither operator services nor nonoptional operator services). Therefore, the ALJ found that the attributes that distinguish CIPS from SAFEBLOCK render moot MCI's arguments based on the *Powell* discussion of SAFEBLOCK as customer premises equipment.

**E. MCI's Exceptions**

34. MCI first argues that the Commission does not have jurisdiction over the services provided under the DOC contract. Accordingly, MCI asserts that CIPS is essentially the same--only more sophisticated with more enhancements and features--as the SAFEBLOCK system. The only significant difference between the two systems MCI discerns is that the VAC 100 System (used with CIPS) has more features and is more sophisticated. MCI further maintains that there is no evidence that the synthesized voice intercepts utilized with CIPS are required for call setup. MCI contends that the calls could technically be completed without the intercepts and are optional at the DOC's discretion. By removing the intercepts, MCI argues that inmates and recipients of inmate's calls "lose." MCI posits that upholding the ALJ's ruling will send a message to the DOC to return to less convenient inmate telephone service and allow inmates to use coins and debit cards to make calls, thereby denying protection to the public and recipients of inmate calls.

35. The joint response of Staff and OCC (Joint Respondents) urges that the Commission uphold the ALJ's analysis. They argue that CIPS provides nonoptional operator services within the jurisdiction of the Commission under the statutory definition in § 40-15-102(19.5), C.R.S., which includes "operator services to provide telephone services to inmates at penal institutions." Therefore, according to the Joint Respondents, the services MCI provides to inmates under the contract with the DOC are nonoptional operator services within the jurisdiction of the Commission.

36. Joint Respondents point out that the undisputed facts establish that inmates cannot use coins when placing calls as they are considered contraband. As a result, all CIPS phones are coinless. Further, DOC rules and regulations require an inmate to use CIPS and its computer-

voice prompts to complete calls. Consequently, the services provided by MCI to inmates under the DOC contract meet the Commission's definition of nonoptional operator services under 4 CCR 723-18-3.1.3.

37. MCI next asserts that even with the two controlling intercept messages, CIPS is not providing regulated operator services because inmates are not required to use an operator to complete calls. Because inmates can use coinless telephones with their debit accounts and are not required to use an operator's services, and because inmates are not required to place collect calls, MCI concludes that the ALJ misinterpreted 4 CCR 723-18-3.1.3. By MCI's reasoning, the two prongs of the rule under which the Commission asserts jurisdiction are not met here.

38. The Joint Respondents respond that MCI is incorrect because the single fact that inmates can only use coinless phones is irrelevant and not material to the analysis. Instead, Joint Respondents contend that the undisputed facts establish that inmates cannot make collect or debit calls using CIPS without encountering a synthesized voice prompt and therefore, these telecommunications services are within the Commission jurisdiction over nonoptional operator services.

39. The Joint Respondents further point out that MCI failed to explain in its exceptions how an inmate can make a debit account call without encountering a voice prompt. Each call placed by an inmate using CIPS begins with a synthesized voice prompt, and other voice prompts may be encountered before the call is completed. The statutory and Commission definitions found at § 40-15-102(20), C.R.S., and 4 CCR 723-18-3.2 provide that operator services can be provided either by live operators or synthesized voice interaction.

40. MCI also argues that the absence of a debit card does not bring the DOC debit call services under the Commission's jurisdiction. MCI points out that nowhere in the 4 CCR 723-18-2.6 definition of a debit card is there a requirement that an actual card be used. Rather, the definition describes a debit card as a method of paying for calls. According to the rule, and because inmates are not required to use an operator to complete a call through use of the debit call canteen account, MCI urges the Commission to find that it has no jurisdiction over any of the services provided under the DOC contract.

41. The Joint Respondents respond that there is a substantial difference between CIPS debit calling services and deregulated debit card services. The debit account accessible by inmates is not the same as debit card service. Debit card service requires an actual card. Because inmates only establish an account to draw from to pay for debit account calls, the Joint Respondents argue that this service is not debit card service. Joint Respondents explain that the debit account itself is not transferable outside the DOC when an inmate is released, nor is the account available for use by anyone but the inmate establishing the account. Joint Respondents conclude that MCI's attempt to equate the debit account calling service to deregulated debit card service fails due to these fundamental differences.

#### **IV. ANALYSIS**

42. We are not persuaded by MCI's arguments. We find that the ALJ's analysis is based on sound reasoning and well established law. The facts amply demonstrate that CIPS is fundamentally different than the SAFEBLOCK system and is therefore subject to Commission jurisdiction.

43. In *Powell*, the supreme court found it undisputed that the SAFEBLOCK system “did not utilize operators, live or recorded, in its operation.” *Id.* at 615. The court found it logical and reasonable to conclude that “one cannot provide nonoptional operator service unless operator service is being provided.” *Id.* It is this provision of nonoptional operator services which was the lynchpin in the court upholding the Commission determination that it did not have jurisdiction over SAFEBLOCK.

44. Here, the ALJ went through a three-prong analysis to determine Commission jurisdiction. First, the ALJ held that the services offered were “operator services” pursuant to § 40-15-102(20), C.R.S. The ALJ found that a customer (as defined in 4 CCR 723-18-6.4) cannot receive service without the use of CIPS’s synthesized voice prompts. An inmate cannot initiate a call without the voice prompts, and CIPS will not connect a collect call unless the inmate utilizes the voice prompts. We agree with the ALJ’s reasoning. Clearly, calls cannot be completed without the use of the synthesized voice prompts. Section 40-15-102(2), C.R.S., provides in part that operator services includes live operators or recordings or computer-voice interaction to enable customers to receive telephone call processing.

45. The second prong of the ALJ’s analysis then was to determine whether the operator services were “nonoptional operator services” as defined in § 40-15-102(19.5), C.R.S., and 4 CCR 723-18-3.1.3. Nonoptional operator services are defined at § 40-15-102(19.5), C.R.S., as “operator services to provide telephone service to inmates at penal institutions.” The ALJ found that CIPS met the statutory definition of nonoptional operator services. Further, the ALJ determined that CIPS met the Rule 18-3.1.3 definition of nonoptional operator services.

46. MCI argued that CIPS did not meet the rule definition since inmates are permitted to use coinless telephones and the DOC does not require inmates to place collect calls.

Accordingly, MCI concludes that the two prongs of the definition are not met, and CIPS does not come within the definition of nonoptional operator services. The Joint Respondents disagree and point out that only one prong of the definition needs to be met, and in any event, CIPS meets both prongs of the definition.

47. The ALJ held that the first prong of the definition was met because inmates are not permitted to use coins when placing calls, since they are considered contraband by the DOC. Therefore, CIPS falls within the rule's definition of nonoptional operator service. The ALJ found that the second prong of the definition was met as well, because DOC rules and CIPS require inmates to use an operator's services to complete a call.

48. We agree with the ALJ's analysis and with the Joint Respondents arguments here. Nothing in MCI's arguments persuades us that an inmate has the option whether or not to use operator services. We find that CIPS meets both prongs of the definition of nonoptional operator services found at 4 CCR 723-18-3.1.3 and § 40-15-102(19.5), C.R.S. We also agree with Joint Respondents that MCI's reasoning that inmates can only use coinless phones is irrelevant and not material to the analysis. What is relevant is that inmates cannot make collect or debit calls using CIPS without encountering a synthesized voice prompt; therefore, these services are within the Commission's jurisdiction over nonoptional operator services.

49. The third prong of the ALJ's analysis was an analysis whether Rule 4 CCR 723-18 applied to the services offered by MCI. We again agree with the ALJ that CIPS falls squarely within the ambit of Rule 18 and is therefore subject to this Commission's jurisdiction. In addition to finding that CIPS satisfies both prongs of Rule 18-3.1.3, the ALJ also found that CIPS is not exempt from Commission regulation because it is not a debit card as defined at 4 CCR 723-18-2.6. Rather, as discussed *supra*, since CIPS is a nonoptional operator service, it

cannot be an “optional operator service” under Rule 18-4.1.5. Further, the debit account under CIPS cannot be construed to be a debit *card* within the meaning of Rule 18-2.6. Because CIPS handles all transactions and calls electronically, an inmate never possesses a card. We agree with the ALJ and Joint Respondents that the debit account under CIPS does not fall within the meaning of debit card found at Rule 18-4.1.5. We also agree with Joint Respondents that there is a substantial difference between CIPS debit calling services and deregulated debit card services, *e.g.*, the ability to place a call outside the CIPS system.

50. Relying on the Colorado Supreme Court’s findings in *Powell*, MCI argues that CIPS is customer premises equipment and thus deregulated by federal law and exempt from Commission regulations. The ALJ concurred with Joint Respondents that it is the nature of the telecommunications service provided that determines the regulatory status of the service. We agree with this reasoning. In *Powell*, it was only after finding that the SAFEBLOCK system was neither operator services nor nonoptional operator services that the ALJ determined that SAFEBLOCK was nothing more than a very sophisticated PBX, exempt as customer premises equipment. However, because CIPS falls squarely within the definition of nonoptional operator service, it is more than a PBX. We therefore agree with the ALJ here that the attributes that distinguish CIPS from SAFEBLOCK render moot MCI’s arguments based on the supreme court’s discussion of SAFEBLOCK in *Powell*.

51. MCI asserts that should the ALJ’s ruling be upheld, it will have the effect of hindering the DOC’s administration and management of penal institutions, which in turn would make it a party to this and any follow on proceedings. We find this assertion without merit. Rather, we agree with the ALJ that the DOC remains free to offer, restrict, or take any other action with respect to inmate access to telephone service. The ALJ correctly asserted that it is

MCI, and not the DOC that will feel the impact of the Commission's jurisdiction. MCI is the regulated utility which must abide by statutes and our rules. We assert no authority over the DOC whatsoever. Although we acknowledge that the DOC will be impacted to some extent by our authority over MCI, we point out that the parties are free to negotiate additional contract terms to compensate for that. Our jurisdictional assertion over MCI here is not optional. We are mandated to pursue our authority over CIPS according to the charge assigned to us by virtue of Article XXV of the Colorado Constitution and applicable state statutes.

52. MCI also argues that the per call charges and higher rates for collect calls are necessary because of the cost of the increased enhancements provided by the VAC System 100, and are associated with services provided through customer premises equipment, not the completion of inmate calls. MCI further argues that the usage rates found in the Operator Service Rules are not appropriate.

53. MCI requested a temporary waiver of Rule 4 CCR 723-18-5.4 pending the Commission's final decision in this docket. That rule requires filing of tariffs containing rates, terms, and conditions, and sets out the procedures to determine whether rates charged for nonoptional operator services are just and reasonable. The ALJ denied the request for a temporary waiver concluding that MCI appeared to abandon the request, the issues would unnecessarily broaden the scope of the Petition, and the pendency of Docket No. 02I-487T, *Re: The Investigation of the Colorado Operator Service Contract Rates Filed by MCI WORLDCOM Communications, Inc., Pursuant to Rule 4 CCR 723-18-5.4.4*, renders moot some, if not all, of the request.<sup>1</sup>

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<sup>1</sup> MCI did not address the waiver issue in its exceptions.



54. We agree with the ALJ. The determination of which charges, if any are appropriate and a determination of the justness and reasonableness of charges under MCI's contract with the DOC should be addressed in Docket No. 02I-487T.

55. Therefore, we deny MCI's exceptions and uphold the ALJ's Recommended Decision in its entirety, consistent with the discussion above.

**V. ORDER**

**A. The Commission Orders That:**

1. The Exceptions of MCI WorldCom Communications, Inc., to Recommended Decision No. R03-0088 are denied.

2. Recommended Decision No. R03-0088 is upheld in its entirety.

3. The 20-day period provided for in § 40-6-114, C.R.S., within which to file applications for rehearing, reargument, or reconsideration begins on the first day following the Mailed Date of this Decision.

4. This Order is effective on its Mailed Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING  
April 9, 2003.**

(S E A L)



**ATTEST: A TRUE COPY**

**Bruce N. Smith  
Director**

THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

**GREGORY E. SOPKIN**

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**POLLY PAGE**

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**JIM DYER**

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Commissioners