

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Applications of Cellco Partnership)	WT Docket No. 12-4
d/b/a Verizon Wireless, Spectrum Co.)	
LLC, and Cox TMI Wireless, LLC)	
)	
For Consent to Assign Wireless Licenses)	

**COMMENTS OF INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,
LOCAL 827 AND SYSTEM COUNCIL T-6 (“IBEW”)**

Robert F. O’Brien, Esquire
O’BRIEN, BELLAND & BUSHINSKY, LLC
1526 Berlin Road
Cherry Hill, NJ 08003
(856) 795-2181
Attorneys for IBEW Local 827

Wendy M. Bittner, Esquire
LAW OFFICES OF WENDY M. BITTNER
15 Court Square, Suite 300
Boston, MA 02108
(617) 624-0200
Attorney for System Council T-6

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION.....	1
II. STANDARD OF REVIEW.....	3
III. THE APPLICANTS HAVE NOT MET THEIR BURDEN OF DEMONSTRATING THAT THE TRANSACTION WILL BE IN THE PUBLIC INTEREST.....	4
A. The Commission’s Public Interest Determination Must Consider the Potential Negative Consequences Of The Transaction on Verizon Employees and Other Workers Affected By the Transaction.....	5
1. The Transaction is Certain to Eliminate Jobs.....	5
2. The Transaction is Likely To Increase Reliance on A Low Paid, Low Benefit, Work Force While Diminishing Opportunities for Bargaining Unit Employees.....	6
3. Significant Unanswered Questions Remain in Regard To The Negative Economic Impact of the Transaction.....	7
B. AN INCREASED PUBLIC DEMAND FOR WIRELESS SERVICE DOES NOT ESTABLISH THAT THIS PARTICULAR TRANSACTION WOULD BE IN THE PUBLIC INTEREST.....	10
1. The Commercial Agreements Are Anticompetitive and Must Be Considered Relevant to These Proceedings.....	10
IV. CONCLUSION.....	14

I. INTRODUCTION

The International Brotherhood of Electrical Workers, Local 827 (“IBEW 827”) and System Council T-6 hereby submits the following comments in opposition to the applications of Cellco Partnership d/b/a Verizon Wireless (“Verizon”, a subsidiary of Verizon Communications, Inc., (“Verizon Communications”)), SpectrumCo, LLC (“SpectrumCo”) and Cox TMI Wireless, LLC. (“Cox”) (collectively “Applicants”) for consent to assign Advanced Wireless Services licenses from SpectrumCo and Cox to Verizon Wireless. In this matter, the Commission must deny the proposed transaction as the Applicants have failed to meet their burden of demonstrating that the assignment of these licenses would be in the public interest.

IBEW 827 is a labor organization that represents approximately five thousand Verizon New Jersey Inc. and Verizon Connected Solutions employees in New Jersey. IBEW 827 members perform a significant amount of the installation and repair work that is an essential component of Verizon’s business.

The System Council T-6 is a labor organization comprised of local unions of the International Brotherhood of Electrical Workers. In Massachusetts and Rhode Island, these locals—Local 2222, 2321, 2322, 2323, 2324 & 2325—represent approximately 8,000 employees of Verizon Communications who perform construction, installation and repair work and provide consumer and operator services to customers of Verizon Communications.

All of these employees stand to be negatively affected in the event that the transaction proposed by the Applicants is approved. The approval of this transaction will result in the loss of potentially thousands of current and future jobs as Verizon Communications abandons the build up, maintenance and expansion of its FiOS network. Additionally, the approval of this transaction is also likely to result in the diminishment of bargaining unit jobs as current union

work is shifted to low pay, low benefit workers or to outside contractors. The Commission's public interest determination must carefully evaluate these potential negative consequences on employees against any assertions of potential public benefit.

The approval of this transaction also cannot be considered to be in the public interest because the terms of the proposed transaction are inherently anticompetitive. Nothing could exemplify an anticompetitive arrangement more than the proposed Commercial Agreements that, among other things, "provide the parties to those agreements with the ability to act as agents selling one another's services."¹

The Applicants have asserted that "because only spectrum is being transferred, and not an operating entity, the proposed transaction will not result in any diminution in competition."² However, despite the fact that an operating entity is not being transferred, even a cursory examination of the proposed transaction raises significant concerns in regard to the potentially collusive relationships that will be created. Verizon is the nation's largest wireless carrier. SpectrumCo is owned by a group of the nation's largest cable MSOs (Comcast Corporation, Time Warner Cable, and Bright House Networks, LLC). Cox is a subsidiary of cable MSO Cox Communications, Inc. If this transaction is approved, these entities will no longer be competing, but will be cooperating and acting as agents selling each other's services. Such an arrangement will most certainly result in a diminution in competition and is likely to result in higher prices and reduced service for consumers.

¹ Letter from J.G. Harrington to Marlene H. Dortch, WT Docket No. 12-4, at 2 (Jan. 18, 2012) ("Cox Submission Letter"); Letter from Michael H. Hammer to Marlene H. Dortch, WT Docket No. 12-4, at 2 (Jan. 18, 2012) ("SpectrumCo Submission Letter")

² See *Applications of Cellco Partnership d/b/a Verizon Wireless, SpectrumCo, LLC, and Cox TMI Wireless, LLC for Consent to Assign Wireless Licenses, Statement of Public Interest, FCC Form 603 at p. 5, 19-25, WT Docket No. 12-4.*

The Applicants assert that the transaction will be in the public interest because it will provide the additional spectrum needed to meet the growing consumer demand for wireless service. While it is indisputable that there is a growing demand for wireless service and the spectrum needed to support it, it does not necessarily follow that approving this transaction will be in the public interest. The demand for spectrum is an industry wide problem that will not be solved merely by placing more spectrum in the hands of the Applicants. Solutions to this industry wide problem must be found that do not create relationships that are inherently anticompetitive.

The Commission must also reject the Applicants' assertion that this matter "warrants prompt review."³ Unlike the Applicants suggest, the Commission's review should not be limited because the Applicants have not demonstrated the Application on its face meets the public interest.⁴ There is also no compelling reason why this matter must be conducted expeditiously.⁵ The Applicants indicate that they have sufficient spectrum to meet their immediate needs and are seeking to secure spectrum resources to meet consumer needs over the long term. Accordingly, there is no valid reason why an in depth and thorough review of the proposed transaction should not be undertaken to evaluate the impact of this transaction on all interested parties and the public at large.

II. STANDARD OF REVIEW

Under Sections 214(a) and 310(d) of the Communications Act, 47 U.S.C. §§ 214(a) and 310(d), the commission must determine whether the Applicants have shown that approval of the transaction would serve the public interest, convenience and necessity. Sections 214 and 310 require the Commission to weigh the potential public interest harms resulting from the proposed

³ See Id. at p. 3.

⁴ See Id. at p. 4.

⁵ See Id. at p. 5.

acquisition against the potential public interest benefits “to ensure that, on balance, the transfers of control serve the public interest, convenience and necessity.”⁶ The Applicants bear the burden of proving that the benefits of the acquisition outweigh the potential harms and serve the public interest.⁷ Here, it is apparent that the Applicants cannot meet this burden.

III. THE APPLICANTS HAVE NOT MET THEIR BURDEN OF DEMONSTRATING THAT THE TRANSACTION WILL BE IN THE PUBLIC INTEREST

The public interest analysis requires the Commission to consider four factors: “(1) whether the transaction would result in a violation of the Communications Act or any other applicable statutory provision; (2) whether the transaction would result in a violation of Commission rules; (3) whether the transaction would substantially frustrate or impair the Commission’s implementation or enforcement of the Communications Act, or would interfere with the objectives of that and other statutes; and (4) whether the transaction promises to yield affirmative public interest benefits.”⁸ The Commission’s public interest analysis encompasses the broad objectives of the Act, “which include, among other things, a deeply rooted preference for preserving and enhancing competition in relevant markets, accelerating private sector deployment of advanced services, promoting a diversity of license holdings, and generally managing the spectrum in the public interest.”⁹

⁶ *In the Matter of Applications of VoiceStream Wireless Corporation, PowerTel, Inc., Transferors, and Deutsche Telekom AG, Transferee, for Consent To Transfer Control of Licenses and Authorizations Pursuant to Sections 214 and 310(d) of the Communications Act*, Memorandum Opinion and Order, FCC 01-142, 16 FCC Rcd 9770 at ¶17 (2001).

⁷ *In the Matter of Applications of Ameritech Corp., Transferor, and SBC Communications Inc., Transferee, for Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act*, Memorandum Opinion and Order, 14 FCC Rcd 14712, FCC 99-279, at ¶48 (1999).

⁸ *Id.*

⁹ *In the Matter of Applications of AT&T, Inc. and Cellco Partnership d/b/a Verizon Wireless For Consent To Assign or Transfer Control of Licenses and Authorizations and Modify a Spectrum Leasing Arrangement*, WT Docket No. 6

Contrary to these objectives, this acquisition will not preserve or enhance competition or promote a diversity of license holdings, but will instead increase and enhance Verizon's dominance in the mobile telephony/broadband market on both the national and local levels. Approval of the acquisition would also interfere with the statutory objective to promote economic opportunity and competition by disseminating licenses among a wide variety of applicants and avoiding excessive concentration of licenses as established in Section 309(j)(3)(B) of the Act, 47 U.S.C. §309(j)(3)(B). Additionally, the proposed transaction is likely to eliminate existing jobs for thousands of Verizon Communications employees now and in the future. The Commission's public interest determination must consider the potential negative consequences of the transaction on Verizon Communications employees and other workers who may be affected by the transaction.

A. The Commission's Public Interest Determination Must Consider the Potential Negative Consequences Of The Transaction on Verizon Employees and Other Workers Affected By the Transaction

If the proposed transaction is approved it will have negative consequences on employees that the Applicants have failed to address or consider. This is not a trivial concern as the Applicants employ thousands of workers who all stand to be affected in some way as a result of this transaction. The impact of this transaction on these workers must be considered in any public interest determination. The Applicants have not addressed these potential negative consequences, nor have they demonstrated that the negative consequences would be outweighed by positive public benefits. In fact, it is likely that the approval of this transaction will eliminate jobs for IBEW Local 827 members and for other workers in the industry.

1. The Transaction is Certain to Eliminate Jobs

09-194, Memorandum Opinion and Order, FCC 10-116, at ¶23 (rel. June 22, 2010) ("AT&T/Verizon Wireless Order").

It is important to consider that the Applicants' proposed transaction involves much more than merely acquiring spectrum to meet future consumer demand. The proposed arrangements between the parties involve a fundamental restructuring of Verizon Communications' operations now and into the future with the potential loss of thousands of jobs.

If the transaction is approved, Verizon Communications announced that it would no longer continue to build out its high-speed FIOs networks.¹⁰ Verizon Communications CEO Lowell McAdam told an audience at the UBS Media conference that the company was aiming to bring fiber optic connections to its target of 18 million homes, and then abandon the technology. "We are going to build out what we said and not any more," he said.¹¹

Instead of paying for costly construction work, Verizon Communications now plans to bundle its service with those of its cable partners. "A few years ago, Verizon Communications' fiber build offered the promise of truly high-speed Internet and video competition. Now Verizon Communications is abandoning that vision. Consumers looking forward to advanced FiOS and video competition will now have to make do with either cable or satellite service."¹² As a result of the transaction Verizon Communications will depend less on its unionized workforce and rely more on the services of low-wage, low-benefit cable companies and their contract labor.¹³

2. The Transaction is Likely To Increase Reliance on A Low-Wage, Low-Benefit, Work Force While Diminishing Opportunities for Bargaining Unit Employees

Currently, a significant percentage of Verizon Communications' installation and

¹⁰ See http://www2.VerizonWireless.com/idc/groups/public/documents/adacct/ubs_vz_transcript.pdf

¹¹ See <http://paidcontent.org/article/419-cable-operators-sell-Verizon-Wireless-advanced-wireless-spectrum-for-3.6-billion/> (paidContent.org, Dec. 2, 2011).

¹² Id.

¹³ Id.

maintenance work is performed by unionized labor including members of IBEW Local 827 and local unions of the System Council T-6. Under the Applicants' proposal this arrangement is likely to change. If Comcast or the other parties can also sell Verizon services than they may also have control over who performs the installation or other services related to these transactions. Significant questions remain in regard to exactly how these new arrangements will affect existing jobs and how these agreements may shift work away from represented to non-represented workers. Until these questions can be answered it cannot be said that approval of this transaction can be considered to be in the public interest.

3. Significant Unanswered Questions Remain in Regard To The Negative Economic Impact of the Transaction

Verizon Communications' CEO Lowell McAdam has suggested that this transaction will not have a negative effect on Verizon Communications' FiOS operations. He has stated that

The theory is, though, that all boats will rise, so FiOS will not be disadvantaged in any way. If I put my Verizon Wireless hat on, we think that the FiOS platform is the strongest platform and each partner can take the core product and do some innovation on top of that if they choose to."¹⁴

However, it is difficult to understand how FiOS will not be "disadvantaged" as the Company abandons the technology altogether. Verizon Communications' decision in this regard is bound to have numerous negative economic consequences that the Applicants have failed to consider or address. Specifically, the Applicants have failed to address the impact of the transaction on: (1) currently announced FiOS build-out plans; (2) currently projected FiOS in-fill plans; (3) the potential for additional FiOS build-outs to which McAdam referred in his UBS conference; (4) Verizon Communications' DSL services in non-FiOS Verizon Communications territories served and 5) Verizon Communications jobs in general and represented jobs in

¹⁴ Id.

particular.

The Applicants have also failed to address the following questions and concerns which must be considered in the Commission's public interest determination.

- a) In areas where there is direct competition between FiOS and one of the SpectrumCo cable companies (or Cox), will the cable companies be able to market a cable/Verizon package against a FiOS package? If so will this change projected FiOS revenue, the number of subscribers, take-up rates and installation and employment levels?
- b) Will the cable companies be permitted to market a cable/wireless package in Verizon Communications non-FiOS areas and, if so, to current Verizon Communications wireline/DSL customers? If so, how will this change projected DSL revenue, the number of subscribers, take-up rates and installation and employment levels?
- c) Will represented or non-represented workers do the work on the following? What are the projected numbers of devices to be installed and the projected number of employees who will do the installation work on the following:
 - i. Any devices that are installed in FiOS locations to coordinate bandwidth between wireless and FiOS wireline?
 - ii. Any devices installed in Verizon Communications non-FiOS areas to coordinate bandwidth between wired cable and wireless?
 - iii. Any devices that are installed in cable company locations to coordinate bandwidth between wireless and the set-top box?
- d) Under the proposed transaction if the cable companies create one or more MVNOs using Verizon:
 - i. Will they be able to market wired [cable]/wireless services in FiOS areas?
 - ii. If so, will they be able to market these services to households already served by FiOS?
 - iii. Could they market a cable company MVNO/FiOS package?
 - iv. If so, would represented workers conduct the work on the FiOS household end to coordinate bandwidth between FiOS and the cable company MVNO?
 - v. Whose call centers would be involved?
- e) Will backhaul traffic currently originating and terminating on Verizon Communications lines be shifted, in any way, to cable company backhaul? Or, will Verizon Communications pick up cable company backhaul

traffic?

- f) How will this transaction effect aggregate employment numbers for Verizon, Verizon wireline and Verizon Wireless operations now and in the future?
- g) How will this transaction effect the aggregate represented workforce numbers now and in the future?
- h) Are there any deployment plans or schedules for further FiOS build out in communities where it is already being offered?
- i) Are there any communities (or relevant jurisdictional category used by Verizon) which do not have FiOS currently but for which Verizon Communications plans to build out FiOS?
- j) What is the projected number of FiOS subscribers in each of these communities?
- k) Are there any changes to projections of FiOS subscribers and how will any changes in projections impact revenue and employment?
- l) How will the transaction impact the current workforce mainly focused on Copper (PSTN) installation and maintenance in the aggregate and by state?
- m) How will the proposed transaction impact capital expenditures by state?
- n) As a result of the reorganization of Enterprise Solutions group that will now oversee all business, government and wholesale operations across Verizon Wireless's and wireline business, who will handle sales, provisioning, and maintenance for business, government and wholesale operations? What will be the aggregate employment figures for both represented and non-represented workers now and in the future?

All of these questions raise significant issues in regard to both the short and long-term economic impact of the proposed transaction. There are thousands of employees both represented and non-represented who may suffer negative consequences if this transaction is approved. In light of the potential negative consequences the Applicants have not met their burden of proving that this transaction would be in the public interest. Additionally, the Applicants have not demonstrated that the proposed transaction will benefit consumers or the

public at large and, accordingly, cannot be considered to be in the public interest.

B. AN INCREASED PUBLIC DEMAND FOR WIRELESS SERVICE DOES NOT ESTABLISH THAT THIS PARTICULAR TRANSACTION WOULD BE IN THE PUBLIC INTEREST

The primary argument offered by the Applicants in support of the proposed transaction is the fact that there is an increased public demand for wireless service.¹⁵ Quoting President Obama, the Applicants declare that “expanded wireless broadband access will trigger the creation of innovative new businesses, provide cost-effective connections in rural areas, increase productivity, improve public safety, and allow for the development of mobile telemedicine, telework, distance learning, and other new applications that will transform Americans’ lives,” but that “[t]his new era in global technology leadership will only happen if there is adequate spectrum available to support the forthcoming myriad of wireless devices, networks, and applications that can drive the new economy.”¹⁶ However, the Applicants have failed to demonstrate that this particular transaction would provide any of these benefits. Additionally, it does not necessarily follow that simply because there is an increased demand for wireless service and the spectrum to support it that this particular transaction is in the public interest. The public’s demand for increased wireless service must be met in a way that does not concentrate control of these resources into the hands of one company. It also must be met in a way that does not create relationships between parties that are inherently anticompetitive, such as the Commercial Agreements proposed by the Applicants.

1. The Commercial Agreements Are Anticompetitive and Relevant to These Proceedings

¹⁵ See *Applications of Cellco Partnership d/b/a Verizon Wireless, SpectrumCo, LLC, and Cox TMI Wireless, LLC for Consent to Assign Wireless Licenses, Statement of Public Interest, FCC Form 603 at p. 5, 19-25, WT Docket No. 12-4.*

¹⁶ *Id.*

At the heart of the Applicants' proposed transaction are agreements whereby each of the participants will act as agents selling the other's services. The Applicants have asserted that these arrangements are not relevant to these proceedings and should not be considered in the Commission's determination. However, nothing could be more inherently anticompetitive than an arrangement where these entities are no longer competing, but will each profit from the sale of any competing services. Verizon Communications' plan to abandon FiOS if this transaction is approved also will decrease competition and reduce consumer choice. Accordingly, the Applicants have failed to meet their burden of demonstrating that the transaction would be in the public interest.

The Applicants repeatedly restate the assertion that only spectrum is being transferred, not an operating entity, knowing that the Commission would be averse to a merger of these entities or the purchase of one by the other. Verizon seeks to purchase the licenses owned by certain cable companies (SpectrumCo and Cox) with whom it has also entered into a cooperative marketing arrangement. In effect, Verizon and the cable companies have entered into a non-compete arrangement. The cable companies will market Verizon, while Verizon markets their video, voice and data. Verizon Communications ceases any expansion of FiOS¹⁷ which competes directly with the cable companies, and instead seeks to purchase their wireless spectrum by a transfer of licenses. All this is without regard for the effects these arrangements have on consumers, customers, employees, national security and the long-range interest of its shareholders.

¹⁷ While copper and FIOS are profitable Verizon has demonstrated that the profits are not sufficient when compared with Verizon Wireless's current profits. Verizon is abandoning FiOS, as it abandoned copper. In three New England States—Maine, Vermont and New Hampshire—it sold its landline operations to Fairpoint which is experiencing difficulty.

While Verizon (and perhaps the Commission) view wireless as fueling economic growth and opportunity, the question is for whom and at what price? Forty percent of the world's smartphones are assembled by just one Chinese company with over one million employees.¹⁸ How does an increase in the use of smartphones benefit the groups whose interests the Commission is required to safeguard?

Verizon's claim of no harm to competition focuses solely on the immediate and ignores the long-term harm. Verizon Communications ceased expansion of FiOS, which competes directly with SpectrumCo's owners. Verizon Communications has already shown its desire to exit copper by its sale in Maine, Vermont and New Hampshire to a third party (which is floundering). Verizon Communications is posturing itself for what appears to be the exiting of copper (including DSL) & FiOS by sales to third parties.

Verizon's citation of its own self-serving statements, as well as SpectrumCo's own statements, as "evidence" is dubious at best (and its estimates, by its own admission, have been historically incorrect). Unless the Commission is prepared to decree that wireless will henceforth be limited to the current wireless companies and no efforts will be made to develop regional wireless companies, the "data" cited by Verizon is irrelevant. Any new company will have to build new stand-alone facilities, purchase devices from manufacturers, secure nationwide roaming agreements and engage in the other costly conduct which allegedly prevents SpectrumCo from using its licenses.

Further, Verizon Wireless surmises that SpectrumCo will be so successful in marketing wireless to its current customers (the market cedes to Verizon by their marketing agreement) that the 20 MHz (30 MHz in Houston) in 149 areas (30 from Cox, two of which are in the same area,

¹⁸ Barboza, David & Duhigg, Charles, Pressure, Chinese and Foreign, Drives Changes at Foxconn, *New York Times*, February 19, 2012.

and 120 from SpectrumCo) will not be sufficient. In other words, due to its unquestionable success, SpectrumCo cannot start such a successful business. Rather, it seeks to profit from the transfer of this booming prospective business to Verizon, as well as profits from increases to its business by tapping into Verizon's markets, "separate business arrangements that will enable them to offer wireless services to their customers."¹⁹

As the Cable Companies have no interest in using the licenses they holds, the government should/must/can rescind these licenses. A license is not a transfer of the actual spectrum but a license to use it. The government is not required to continue to license an entity that refuses to use the license. A license is a privilege, not a right, and governments, from time to time, have changed the requirements for continuing to hold a license. Considering their initial cost, the small outlays SpectrumCo made should not be sufficient to prevent the licenses from reverting to the people, if the Cable Companies has no interest in their use and the nation, not the Cable Companies, should benefit from their increased value. Commissioner Robert McDowell has reportedly questioned whether Comcast properly purchased the wireless spectrum to begin with, Philadelphia Inquirer, 1/25/12, <http://www.philly.com/philly/business/20120125>.

SpectrumCo has made it clear that subsequent to its acquisition of the licenses in November 2006²⁰ despite their \$20 million initial expenditure, they have decided that the operation of their own wireless network "would not provide a return warranting the costs and risks involved."²¹ This decision may not be in the long term best interest of its shareholders. If wireless usurps the role of copper/FIOS/DSL for voice, video and data, the Cable Companies lost their opportunity to operate a wireless network.

¹⁹ See Description of the Transaction and Public Interest Statement, re: SpectrumCo, p. 23.

²⁰ Seven months before the first iPhone became available to customers in June 2007, according to Verizon Wireless. See Id. at p. 22.

²¹ Id. at p. 21.

Verizon claims that the transfer of these licenses to it does not immediately reduce the number of local or national competitors, but ignores any future impact.

Verizon is not averse to predicting the future, but it refuses to predict how the transfer of these licenses could impede the ability of current wireless companies to compete in the future. According to SpectrumCo and Verizon, the cost of a new cell phone company—building of facilities, purchasing devices, contracting for roaming—is prohibitive even when that new company is assured a consumer base whose demand far exceeds its potential customers. In fact, Verizon goes so far as to predicate the Commission’s need to approve these sales and transfers upon SpectrumCo.’s future need for additional spectrum.

IV. CONCLUSION

In sum, there is no evidence that the sale and transfer of these licenses to Verizon serves the interest of the public—consumers, employees, competitors, the nation—as it would allow Verizon Communications and the Cable Companies to monopolize the landline for voice, video, data and dial tone while simultaneously expanding Verizon Wireless’ national operations by the transfer of 149 licenses of 20 MHz (two licenses overlap) and one of 30MHz of spectrum.

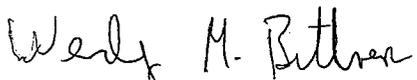
Respectfully Submitted,

Dated: Feb. 21, 2012

By: 

Robert F. O’Brien, Esquire
O’BRIEN, BELLAND & BUSHINSKY
1526 Berlin Road
Cherry Hill, New Jersey 08003
(856) 795-2181
Attorneys for IBEW 827

Dated: February 21, 2012

By: 

Wendy M. Bittner, Esquire
LAW OFFICES OF WENDY M. BITTNER

15 Court Square, Suite 300
Boston, MA 02108
(617) 624-0200
Attorney for System Council T-6