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Witness: Harold W. Furchtgott-Roth

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Sponsoring Party: CenturyTel of Missouri,
LLC and Spectra Communications Group,
LLC d/b/a CenturyTel

Case No.: TC-2007-0341

REBUTTAL TESTIMONY

OF

HAROLD W. FURCHTGOTT-ROTH

ON BEHALF OF

**CENTURYTEL OF MISSOURI, LLC AND SPECTRA
COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL**

CASE NO. TC-2007-0341

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Socket Telecom, LLC,

Complainant,

v.

CenturyTel of Missouri, LLC dba
CenturyTel and Spectra Communications
Group, LLC dba CenturyTel,

Respondents.

Case No. TC-2007-0341

AFFIDAVIT OF HAROLD W. FURCHTGOTT-ROTH

I, Harold W. Furchtgott-Roth, of lawful age and being duly sworn, state as follows:

1. My name is Harold W. Furchtgott-Roth. I am presently president of Furchtgott-Roth Economic Enterprises.
2. Attached hereto and made apart hereof for all purposes is my rebuttal testimony in the above-referenced case.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge, information, and belief.

Harold Furchtgott-Roth
Harold W. Furchtgott-Roth

Subscribed and sworn to before me this 22nd day of May, 2007.

Sandra Dallas Jeter
Notary Public

My Commission expires: 10/31/09
(SEAL)

Sandra Dallas Jeter
Notary Public District of Columbia
My Commission Expires 10/31/09

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**REBUTTAL TESTIMONY OF
HAROLD W. FURCHTGOTT-ROTH**

**ON BEHALF OF CENTURYTEL OF MISSOURI, LLC AND SPECTRA
COMMUNICATIONS GROUP, LLC d/b/a CENTURYTEL**

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Harold W. Furchtgott-Roth. My business address is 1200 New Hampshire Avenue, N.W., Suite 800, Washington, DC 20036. My resume is attached as Schedule 1.

Q. HOW ARE YOU PRINCIPALLY EMPLOYED?

A. I am founder and president of Furchtgott-Roth Economic Enterprises, an economic consulting firm.

Q. DO YOU HAVE OTHER PROFESSIONAL RESPONSIBILITIES?

A. I also am a Senior Fellow at the Hudson Institute, and I write a weekly column for the *New York Sun*. I serve on the board of MRV Communications and chair the board of Oneida Communications. I chair the board of the Telecommunications Policy Research Conference. I serve on various other advisory boards.

Q. ARE YOU FAMILIAR WITH FEDERAL TELECOMMUNICATIONS STATUTES AND REGULATION?

A. Yes. I was chief economist of the House Commerce Committee from 1995 – 1997, and I was one of the principal staff members working on the Telecommunications Act of 1996. From 1997-2001, I was a commissioner of the

Federal Communications Commission. I authored a book on telecommunications regulation under the 1996 Act entitled *A Tough Act to Follow*.

Q. HAVE YOU TESTIFIED BEFORE STATE REGULATORY AGENCIES ON TELECOMMUNICATIONS ISSUES?

A. Yes. I have testified in writing or in person on telecommunications issues before the state regulatory bodies in Alaska, Connecticut, and Puerto Rico.

Q. HAVE YOU WORKED JOINTLY WITH STATE COMMISSIONERS?

A. Yes. As an FCC commissioner, I served on the Joint Board on Universal Service with several state commissioners. I met in Washington and around the country with state regulatory commissioners. Since leaving the FCC, I continue to see and work with state regulators at the biannual KMB Video Conference on Telecommunications which hosts many state regulators.

Q. PLEASE DESCRIBE YOUR BACKGROUND AND WORK-RELATED EXPERIENCE.

A. I grew up in Tennessee and South Carolina, and I attended classes at the University of South Carolina. I received my undergraduate degree in economics from the Massachusetts Institute of Technology, and I earned a Ph.D. in economics from Stanford University. Subsequently, I was a research analyst at the Center for Naval Analyses, a think tank for the Department of Navy where I primarily worked on projects for the Marine Corps. I then went to an economic consulting firm, Economists Incorporated, where I served as a senior economist. I then entered government as mentioned above as chief economist for the House Commerce Committee in 1995. I was a commissioner of the FCC from 1997-2001. I left the FCC in 2001 to join the American Enterprise Institute as a Visiting

Fellow. In 2003, I founded Furchtgott-Roth Economic Enterprises, an economic consulting firm.

Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING?

A. No.

Q. ON WHOSE BEHALF ARE YOU SUBMITTING REBUTTAL TESTIMONY?

A. I am submitting rebuttal testimony as an expert witness on behalf of CenturyTel of Missouri, LLC and Spectra Communications Group, LLC, collectively referred to herein as "CenturyTel."

II.

SUMMARY

Q. WHAT ISSUES DO YOU ADDRESS IN YOUR TESTIMONY?

A. I am addressing issues related to federal telecommunications regulation as presented in the direct testimony of Elizabeth Kistner and R. Matthew Kohly.

Q. DO YOU HOLD THE OPINIONS THAT YOU EXPRESS IN THIS TESTIMONY TO A REASONABLE DEGREE OF CERTAINTY?

A. Yes.

III.

ISSUES OF FEDERAL TELECOMMUNICATIONS REGULATION PRESENTED BY ELIZABETH KISTNER

Q. HAVE YOU REVIEWED MS. KISTNER'S DIRECT TESTIMONY?

A. Yes.

Q. IS MS. KISTNER'S DESCRIPTION OF SERVICE PROVIDER PORTABILITY, NUMBER PORTABILITY, AND LOCATION PORTABILITY ACCURATE?

A. Ms. Kistner discusses service provider portability, number portability, and location portability in her direct testimony.¹ The specific definitions she cites from the *Code of Federal Regulations* are accurate.² These definitions related to number portability and location portability have not changed in the past ten years when the FCC defined various aspects of number portability and location portability by regulation.

Below I list the four regulatory definitions of portability under Part 52 Rules for number portability:³

(j) The term *location portability* means the ability of users of telecommunications services to retain existing telecommunications numbers without impairment of quality, reliability, or convenience when **moving from one physical location to another.**

(l) The term *number portability* means the ability of users of telecommunications services to **retain, at the same location,** existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.

(p) The term *service portability* means the ability of users of telecommunications services to retain existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from

¹ Kistner Direct Testimony at 3-4.

² 47 CFR 52.21.

³ 47 CFR 52.21.

one telecommunications service to another, without switching from one telecommunications carrier to another.

(q) The term *service provider portability* means the ability of users of telecommunications services **to retain, at the same location**, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.

[Emphasis in bold added]

Note that in three of the four definitions of portability under Part 52 Rules, and all three of the definitions at issue in this proceeding, the word “location” is central to the definition. There can be no location portability, number portability, or service provider portability, without a concept of “location.” The dictionary definition conforms with the common usage of the word, and “location” is bounded or limited in scope.⁴ Ms. Kistner, however, inaccurately suggests that “location” can have more elastic and ambiguous meaning in the FCC rules.⁵

Q. IS THE WORD “LOCATION” COMMONLY FOUND IN RELATED STATUTES AND COMMISSON RULES?

A. Yes, the word “location” appears dozens of times in the Communications Act. Related terms such as “local,” “locality,” and “localities” are also common.⁶

Q. CAN YOU DESCRIBE IN MORE DETAIL HOW MS. KISTNER’S INTERPRETION OF “LOCATION” WITH RESPECT TO NUMBER PORTABILITY IS INACCURATE?

A. Yes. Ms. Kistner suggests that because the FCC has “not expressly in a rule”⁷ defined “same location” or “physical location” differently from their standard

⁴ See, e.g., <http://dictionary.reference.com/browse/location>, where the first three, and most relevant, definitions, of location are:

1. a place of settlement, activity, or residence: *This town is a good location for a young doctor.*
2. a place or situation occupied: *a house in a fine location.*
3. a tract of land of designated situation or limits: *a mining location.*

⁵ Kistner Direct Testimony at 4-6.

⁶ I count 243 instances of these terms.

⁷ Kistner Direct Testimony at 4.

dictionary definition, "an implicit definition has evolved"⁸ with respect to their definitions in the context of number portability. The simpler, more straightforward, and correct interpretation is that, where the FCC has not provided an alternative definition, dictionary or commonly understood definitions apply to words in FCC rules.

Q. DO YOU AGREE WITH MS. KISTNER'S STATEMENT: "IN ESTABLISHING REQUIREMENTS FOR NUMBER PORTABILITY, CONGRESS AND THE FCC RECOGNIZED THAT, AS A PRACTICAL MATTER, THE BENEFITS OF COMPETITION WOULD NOT BE REALIZED IF NEW ENTRANT LOCAL EXCHANGE SERVICE PROVIDERS WERE UNABLE TO WIN CUSTOMERS FROM INCUMBENT PROVIDERS DUE TO ECONOMIC OR OPERATIONAL BARRIERS."⁹

A. The statement is correct to the extent that the statutory requirement for number portability is intended to enable competition for a customer in a specific location. Ms. Kistner's statement could easily be misread to authorize FCC rules beyond statutory language. Thus, neither Congress nor statute nor the FCC authorizes any and all forms of portability to include location portability. Nor does statutory language permit the FCC to write rules to permit competitive providers to win customers from incumbent providers merely to overcome "economic or operational barriers." The FCC has authority to write rules as required by statute, not for specific market outcomes.

Q. IS MS. KISTNER'S CHARACTERIZATION ACCURATE THAT CUSTOMERS HAVE BEEN ABLE TO RETAIN THEIR TELEPHONE NUMBERS IN SOME CIRCUMSTANCES WHEN THEY MOVE FROM ONE HOUSE OR COMMERCIAL BUILDING TO ANOTHER?¹⁰

⁸ Ibid.

⁹ Ibid.

¹⁰ See Kistner Direct Testimony at 4-5.

A. This form of number porting is location porting for which the FCC has consistently refused to create a regulatory mandate. The important qualifying phrase in Ms. Kistner's testimony is "in some circumstances." Ms. Kistner does not distinguish between instances when customers changing locations retain their numbers as a matter of legal obligation on a carrier (of which there appear to be none)¹¹ versus instances when a customer retains a number as the result of a contractual arrangement with one or more carriers¹² versus instances when customers simply have no option to retain a number.

The last option, no retention of number when moving, is the normal situation. Indeed, the FCC even has a set of questions and answers for consumers on its web site with the following discussion:¹³

Does long-term telephone number portability mean that I can keep the same telephone number if I move across town or to another state?

No. The type of telephone number portability that local telephone companies must provide as a result of Congress' mandate is called "service provider portability." Service provider portability allows a customer to change his or her local telephone company without changing telephone numbers. It does not allow customers to take their telephone numbers with them when they move.

Q. IS IT POSSIBLE THAT THE FCC WEB SITE IS INACCURATE IN ITS DESCRIPTION OF CUSTOMER RETENTION OF NUMBERS WHEN THEY MOVE?

A. No. The FCC is aware of the differences between location portability and service portability, and to date, the FCC has declined to adopt regulations with respect to location portability, even within the same exchange area.

¹¹ This is purely location porting.

¹² Foreign exchange and remote call forwarding are contractual private line arrangements.

¹³ See Local Number Portability, available at:

http://www.fcc.gov/Bureaus/Common_Carrier/Factsheets/portable.html.

Consider the following discussion from FCC RM 8535.¹⁴

B. Location Portability

1. Pleadings

28. SBC argues that the Commission should not address location portability at this time because the Act did not contemplate implementation of such portability.

2. Discussion

29. We decline to adopt SBC's proposal that the Commission decide now that we will not consider location portability until service provider number portability is successfully deployed in the 100 largest MSAs. The Commission concluded in the First Report and Order that the requirement that all LECs provide local number portability (i.e., service provider portability) pursuant to section 251(b)(2) does not include location portability because the Act's number portability mandate is limited to situations when users remain "at the same location" when switching from one telecommunications carrier to another. Although we did not require LECs to provide location portability when the First Report and Order was issued, we nevertheless concluded that nothing in the Act would preclude us from mandating location portability if, in the future, we determine that location portability is in the public interest.

30. The Commission has no current plans to address location portability at this time. We need not and do not address the issue of whether it may be in the public interest to require the implementation of location portability at some point in the future.

Particularly note that the FCC decides that location portability is not under 251(b)(2). The FCC reserves the prerogative in the future to mandate it under different sections of the Act, but not 251(b)(2). It has never exercised that prerogative.

¹⁴ FCC, RM 8535, Second Memorandum Opinion and Order on Reconsideration, Released October 20, 1998.

Q. AS MS. KISTNER DESCRIBES IT, ARE FOREIGN EXCHANGE AND REMOTE CALL FORWARDING FORMS OF NUMBER PORTABILITY?¹⁵

A. No. These are forms of private line contracts among agreeing parties but not obligations under 251(b)(2). Under FCC rules, foreign exchange is a form of private line interexchange service, not a local exchange number portability service.¹⁶ The party arranging either the foreign exchange or the remote call forwarding would be responsible for all costs associated with the service including private line leasing and toll services.

FCC rules for number portability including those for 251(b)(2) are included in Subpart C of Part 52 of its rules. Those rules make no mention of foreign exchange (FX). Remote call forwarding (RCF) is one form of "transitional number portability measure,"¹⁷ that would not comply with commission rules for long-term number portability requirements.¹⁸ Moreover, a party arranging RCF would ordinarily be responsible for toll fees.

Q. IS MS. KISTNER'S DISCUSSION OF THE DISTINCTION BETWEEN SERVICE PROVIDER PORTABILITY AND LOCATION PORTABILITY ACCURATE?¹⁹

A. No. Ms. Kistner confuses the technical possibility of location portability with the absence of statutory authority under 251(b)(2) and, as discussed above, with an

¹⁵ "Also, with foreign exchange ("FX") or Remote Call Forwarding ("RCF") services, which have been available for decades, a customer can physically move long distances away and retain the same telephone number." See Kistner Direct Testimony at 5.

¹⁶ 47 CFR 69.2. "(dd) *Private line* means a line that is used exclusively for an interexchange service other than MTS, WATS or an MTS-WATS equivalent service, including a line that is used at the closed end of an FX WATS or CCSA service or any service that is substantially equivalent to a CCSA service."

¹⁷ 47 CFR 52.21.r.

¹⁸ These requirements are stated at 47 CFR 52.23.

¹⁹ Kistner Direct Testimony at 5-6.

absence of an FCC decision to authorize location portability under a different section of the Act.

Q. IS MS. KISTNER'S DISCUSSION OF THE FACTORS AFFECTING LNP ARCHITECTURE AND RULES ACCURATE?²⁰

A. Only partly. As Ms. Kistner observes, rating and routing information clearly had some influence on each of the hundreds of specific LNP architectures plans around the country. Details of those plans were largely left to local exchange carriers and state commissions. Other factors also influenced those plans including available equipment, location of points of interconnection, and, as Ms. Kistner observes, other LEC obligations such as CALEA. Actual FCC rules, however, were based on many factors including statutory language that dominate the details of rating and routing information. Most importantly, nothing in FCC rules would lead to a conclusion that "location" for purposes of 251(b)(2) or any other statutory or regulatory provision is equivalent to rating or routing information.

Q. IS MS. KISTNER'S DISCUSSION ABOUT NUMBER PORTING BETWEEN WIRELINE AND WIRELESS CARRIERS RELEVANT FOR NUMBER PORTING BETWEEN WIRELINE AND WIRELINE CARRIERS?²¹

A. No. FCC rules on number portability are clear. They make a distinction between local exchange carriers and commercial mobile radio service (CMRS) providers.²² CMRS customers are inherently mobile without a fixed location for most purposes including number portability. The FCC issued a separate order

²⁰ Kistner Direct Testimony at 7-8.

²¹ Kistner Direct Testimony at 8-9.

²² See, e.g., 47 CFR 52.21.h.

specifically on porting numbers from wireline to CMRS carriers.²³ Rules governing porting numbers to CMRS carriers do not create location porting for wireline to wireline customers.

Q. DO YOU AGREE WITH MS. KISTNER THAT THE PORT REQUESTS AT ISSUE IN THIS PROCEEDING ARE NOT REQUESTS FOR LOCATION PORTING?²⁴

A. No. As I understand the facts in this proceeding, the customer for Socket has moved. That fact alone, if the move is merely to a different location within the Willow Springs exchange, leads to location porting, a service not mandated either for federal statute or rule. Moreover, as I understand the facts, the Socket customer has moved from Willow Springs to St. Louis. There is no plausible service porting interpretation; it is purely location porting.

Q. DO YOU AGREE WITH MS. KISTNER THAT THE SOCKET REQUESTS ARE "IN ACCORDANCE WITH REQUIREMENTS PRESCRIBED" BY THE FCC?²⁵

A. No. As I explained above, FCC service portability rules do not cover change of location, and the FCC has no location portability rules.

Q. DO YOU AGREE WITH MS. KISTNER THAT THE PROVISION OF THE SOCKET PORT REQUESTS IS ESSENTIAL TO PROMOTING COMPETITION AS ENVISIONED BY THE TELECOMMUNICATIONS ACT OF 1996?²⁶

A. No. The Telecommunications Act of 1996 was carefully crafted to promote competition in many ways including local number portability. The Socket port requests are not local number portability but rather location portability--neither an

²³ See FCC, *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, CC Docket 95-116, released November 10, 2003.

²⁴ Kistner Direct Testimony at 9-10.

²⁵ Kistner Direct Testimony at 11.

²⁶ *Ibid.*

inherent element of competition, nor part of the Telecommunications Act, nor required by FCC rule. As I have explained elsewhere, unpredictable and unlawful interpretations of the Telecommunications Act have undermined it as well as business and consumer confidence in a competitive industry.²⁷ Granting the Socket request for location portability under the guise of Section 251(b)(2) would undermine the Act.

²⁷ See H. Furchtgott-Roth, *A Tough Act To Follow? The Telecommunications Act of 1996 and the Separation of Powers*, (Washington, DC: AEI Press, 2006).

IV.

ISSUES OF FEDERAL TELECOMMUNICATIONS REGULATION
PRESENTED BY R. MATTHEW KOHLY

Q. HAVE YOU REVIEWED MR. KOHLY'S DIRECT TESTIMONY?

A. Yes.

Q. DO YOU AGREE WITH MR. KOHLY'S DESCRIPTION OF NUMBER PORTABILITY?²⁸

A. No. Mr. Kohly's description of number portability ignores location restrictions.

Q. DO YOU AGREE WITH MR. KOHLY'S DESCRIPTION OF NUMBER PORTABILITY WHERE "AT THE SAME LOCATION" MEANS ASSIGNED TO THE SAME RATE CENTER?²⁹

A. No. "Same location" means same "same location" independent of rates. If rates to China were the same as in Missouri, it still would not follow that China is in the same location as Missouri.

Q. DO YOU AGREE WITH MR. KOHLY THAT "CONTRARY TO FCC AND INDUSTRY STANDARDS, CENTURYTEL ASSERTS THAT IT DOES NOT HAVE TO PORT NUMBERS IF THE CUSTOMER MOVES ITS SERVICE FROM ONE SITE TO ANOTHER."³⁰

²⁸ Kohly Direct Testimony at 6-7.

²⁹ Kohly Direct Testimony at 8.

³⁰ Ibid.

A. No

Q. HAVE YOU REVIEWED MR. KOHLY'S DIAGRAMS LABELLED AS SCHEDULE MK-17?³¹

A. Yes.

Q. DO YOU AGREE WITH MR. KOHLY THAT DIAGRAM 5 DESCRIBES FCC-MANDATED LOCAL NUMBER PORTABILITY?

A. No

Q. WHY NOT?

A. In Scenario 5, the customer is outside the exchange boundary, and number portability from within the exchange to outside the exchange clearly does not apply. That scenario is unambiguously location portability regardless of the rate plan. Even a variation of Scenario 5 in which the customer moves but remains within the Willow Springs Exchange Boundary might not qualify for number portability.

Q. MR. KOHLY DESCRIBES HOW SOCKET COMMUNICATIONS APPROACHED THE LOCAL NUMBER PORTABILITY ADMINISTRATION WORKING GROUP (LNPA-WG) TO "HELP RESOLVE THIS ISSUE."³² IS IT YOUR UNDERSTANDING THAT LNPA-WG TYPICALLY HANDLES SUCH DISPUTE RESOLUTIONS?

A. No. The LNPA-WG was established by the North American Numbering Council. It is a useful body and advises various groups including the FCC on number portability issues, particularly technical aspects of porting. It currently has four

³¹ Kohly Direct Testimony, MK - 17.

active subcommittees: Wireless Wireline Integration Subcommittee; Number Pooling Subcommittee; Wireless Number Portability Subcommittee; and Slow Horse Subcommittee.³³ It does not have a dispute resolution subcommittee, nor does its website have any references to any past dispute resolutions.

V.

CONCLUSION

Q. WHAT IS YOUR CONCLUSION?

A. I have reviewed issues related to federal telecommunications regulation as presented in the direct testimony of Elizabeth Kistner and R. Matthew Kohly. I find many misinterpretations of federal telecommunications regulations in their direct testimony. Conclusions reached by these witnesses based on their understanding of federal telecommunications regulations are not reliable.

³² Kohly Direct Testimony, at 28.

³³ See Number Portability Administration Center (NPAC) Frequently Asked Questions, available at: <http://www.npac.com/cmas/faq.shtml>.

SCHEDULE 1

RESUME OF HAROLD W. FURCHTGOTT-ROTH

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Experience

Furchtgott-Roth Economic Enterprises, President
(2003-present).

Economic consultant.
Business columnist, *New York Sun*, May 2004 – present.
Senior Fellow, Hudson Institute, 2007 – present.

American Enterprise Institute, Visiting Fellow
(2001-2003).

Federal Communications Commission, Commissioner
(1997-2001).

One of five commissioners responsible for U.S.
communications policy, rulemaking, enforcement, and
adjudication. Among other responsibilities, reviewed all
major mergers in communications sector. For statements,
speeches, and other information, see
<http://www.fcc.gov/commissioners/previouscommish.html>

Committee on Commerce, U.S. House of Representatives, Chief
Economist, (1995-1997).

One of the principal staff for the Telecommunications Act
of 1996, Balanced Budget Act of 1995, and electricity
deregulation legislation for the 105th Congress.

Economists Incorporated, Senior Economist (1988-1995).

Center for Naval Analyses, Research Analyst, (1984-1988).

**Experience
(continued)**

Stanford University, Research Assistant, and Teaching Assistant for public finance, (1980-1983).

U.S. Department of Energy, Conservation and Renewable Energy Program, Research Assistantship, (1981-1982).

Office of Management and Budget, Intern, (Summer 1980).

Congressional Budget Office, Assistant Analyst, (1978-1979).

U.S. Department of Labor, Pension and Welfare Benefits Program, Intern, (Summer 1977).

MIT, Center for Transportation Studies, Research Assistant, (1976-1978).

U.S. Senate Committee on Appropriations, Internship sponsored by MIT Political Science Department, (Summer 1976).

Education

Ph.D., Stanford University, Economics, 1986

S.B., Massachusetts Institute of Technology, Economics, 1978.

University of South Carolina, 1973-1974.

Honors

Awards for FCC achievements from various civic and business groups

Visiting Fellow, University of Warwick, (Summer 1984).

Research Fellow, Brookings Institution, (1983-1984).

National Merit Scholar, MIT, (1974).

Professional Societies

American Economics Association
Econometrics Society
Federalist Society

Boards

Corporate

MRV Communications
Oneida Communications

Other

Washington Legal Foundation
Legal Policy Advisory Board
Telecommunications Policy Research Conference,
Chairman
University of Richmond School of Law
Intellectual Property Institute Advisory Board
KMB Video Journal Advisory Board
Member of panel to support National Security Agency
study, "Protecting the U.S. Telecommunications
Infrastructure—The Way Forward," (2003 – 2004).

Books

A Tough Act To Follow? The Telecommunications Act of 1996 and the Separation of Powers, (Washington, DC: AEI Press), 2006.

Cable TV: Regulation or Competition, with R.W. Crandall,
(Washington, DC: The Brookings Institution), 1996.

Economics of A Disaster: The Exxon Valdez Oil Spill, with B.M. Owen, D.A. Argue, G.J. Hurdle, and G.R. Mosteller, (Westport, Connecticut: Quorum books), 1995.

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(Westport, Connecticut: Quorum Books), 1993.

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