UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

In re:	)	
	)	
MARYLAND/DC/DELAWARE	)	
BROADCASTERS ASSOCIATION, et. al.	)	Docket no. 04-1192
	)	
Petitioners	)	
	)	

RESPONSE OF EEO SUPPORTERS IN OPPOSITION TO PETITION FOR ISSUANCE OF WRIT OF MANDAMUS

The Minority Media and Telecommunications Council and forty-five other public interest organizations ("EEO Supporters") file this Response in opposition to the Petition for Issuance of Writ of Mandamus (the "Petition") submitted by a number of state broadcasters' associations ("the Broadcasters").[1/] Mandamus is "an extraordinary remedy, to be reserved for extraordinary situations." Venezuela v. Philip Morris Inc., 287 F.3d 192, 198 (D.C. Cir. 2002); see also 13th Regional Corp. v. U.S. Dep't. of the Interior, 654 F.2d 758, 760 (D.C. Cir. 1980) (quoting Cartier v. Secretary of State, 506 F.2d 191, 199 (D.C. Cir. 1974)) (mandamus available only in "the clearest and most compelling cases."). No such extraordinary or compelling situation is presented in this case.

In their Petition, the Broadcasters ask for both (1) an order directing the Federal Communications Commission ("FCC") to act on pending Motions to Reconsider aspects of the Commission's Equal Employment Opportunity Rule ("the EEO Rule" or the "EEO regulations")

[1/] A complete list of the EEO Supporters is attached as Exhibit 1. Included are national civil rights organizations; organizations of minority journalists, minority publishers, and minority lawyers; and trade organizations representing minority-owned broadcasters. The Office of Communication of the United Church of Christ, Inc., whose l967 petition for rulemaking led to the Commission's original EEO rules, also is one of the EEO Supporters.

and (2) an order to withdraw or delay audits of compliance with the current rule until after the FCC acts on the motions for reconsideration. The Broadcasters have not made the high showing required for a writ of mandamus with regard to either request, but it is especially important that the Court deny the request to delay the EEO audits. The audits, which are essentially the only compliance mechanism for the EEO regulations, are vital to stop the erosion of diversity in our nation's broadcasting workforce.

The Broadcasters have failed to articulate any basis for this Court to intervene at this time in the FCC's implementation of its existing EEO regulations, including the audit provisions. In their Petition, the Broadcasters do not argue that the FCC lacks the statutory authority to conduct its EEO audits, or that the subject matter addressed by the audits is improper. Indeed, the Broadcasters do not even request that the Court order changes to the audit procedures; instead they ask only for a delay until their other concern—the Motions to Reconsider—is addressed.

The FCC's decision about how and when to follow through on its own regulations is discretionary in nature, and courts have no authority to issue a writ of mandamus with regard to a government agency's discretionary duties. See Swan v. Clinton, 100 F.3d 973, 977 (D.C. Cir. 1996). No one disputes that the EEO Rule took effect on March 10, 2003, or that the Broadcasters did not seek either a stay of any part of the Rule's implementation (until now) or reconsideration of the Rule's audit provisions. A year later, the agency initiated the audit process to gather information on compliance with the new regulations. How it is doing so is not the proper subject of a petition for writ of mandamus.

Even if the audits were not discretionary (which they plainly are), there would be no basis to delay the audit process. A petitioner seeking a writ of mandamus also must show that no other adequate remedy exists, in the courts or before the agency, Ganem v. Heckler, 746 F.2d

844, 853 (D.C. Cir. 1984), but the Broadcasters cannot make that showing. The audit process is not at all complex; stations are asked to submit their job recruitment materials and to answer seven straightforward questions about their own equal employment opportunity initiatives and about discrimination complaints they have received. Simply reporting on its EEO activities could not cause irreparable injury to a broadcaster. Instead, the Broadcasters' assertion of injury is based on how the FCC or others *might* use the information they report. But if the FCC does seek to sanction any broadcaster based on information gleaned from the audits, the broadcaster will have ample opportunity to be heard before the Commission, and ultimately to appeal to this Court.

Finally, any justification for delaying the EEO audits must be balanced against the reasons for proceeding with the audits immediately. The public has a strong interest in having the FCC monitor compliance with its EEO rules through the audit process. The FCC adopted the EEO rules—including the audit provision—to further the public interest in preventing discrimination in the broadcast industry and promoting a diverse workforce that produces a wide range of programming. Diversity did increase among broadcasters under the FCC's old EEO rules, and when those rules were suspended in 2001, the percentage of women and minorities working for broadcasters immediately began to drop. Discrimination is still a concern, and only through active monitoring can the FCC ensure compliance with its new EEO Rule.

STATEMENT OF THE FACTS

The FCC adopted the EEO Rule at issue in this case in late 2002. Review of the Commission's Broadcast & Cable Equal Employment Opportunity Rules & Policies, 17 FCC Rcd 24018 (2002) ("Review of EEO Rules"). The Rule included a provision for the audit of

licensees' compliance that is now codified at 47 C.F.R. 73.2080(f)(4). On February 6, 2003, a number of organizations—including the Broadcasters—filed petitions to reconsider discrete aspects of the EEO Rules, but no one challenged the audit provisions. Nor did the Broadcasters or any other entity move the FCC to stay implementation of the audit provisions or other aspects of the EEO Rule while the petitions for reconsideration were pending. Accordingly, the EEO Rule—including the audit provision—went into effect on March 10, 2003. No one disputes that licensees are obligated to comply with the Rule, or that the FCC has the authority to implement it, while petitions for reconsideration are pending. See 47 C.F.R. 1.106(n) & 1.427(a).

After the EEO Rule had been in force for a full year, the FCC began the audit process on May 28 of this year. The FCC issued a public notice announcing the start of audits and sent a letter inquiry to a randomly generated list of radio and television stations.[2/] The audit letters contain seven questions. They ask licensees to provide copies of files that they are already required to maintain and to describe recent employee recruitment activities, employment discrimination complaints received by the station, and internal efforts to gauge compliance with the EEO rules. Stations were given until June 28—one month—to respond.

The Broadcasters filed an Emergency Request for Relief Under Broadcast EEO Audits on June 7 with the FCC.[3/] In that filing, the Broadcasters raised most of the same arguments found in their petition to this Court, and they requested that the Commission withdraw the audit letters or extend the deadline for responding to the audit letters until 90 days after the Commission had ruled on the still-pending Motions to Reconsider unrelated aspects of the EEO Rule.

[2/] The public announcement and the form audit letter are attached as Exhibits 2 & 3.

[3/] The Emergency Request for Relief is attached as Exhibit 4.

The Media Bureau denied that request on June 21 in a letter from the Chief of the Media Bureau. See Letter from W. Kenneth Ferree, Chief of the Media Bureau, to Richard Zaragoza and Paul Cicelski, 6/21/2004 ("Ferree Letter") (Exhibit 5 hereto). "[G]iven that the review is based on our current rules," the Media Bureau concluded, "there is no basis to delay audits pending possible revisions to those rules." The Media Bureau also rejected the contention that the audit letters requested more information than the EEO rules authorized, as well as the assertion that "customary practice" prevented the FCC from making the audit results available in stations' public files. Finally, the Media Bureau confirmed that it expected to audit only five percent of stations this year.

ARGUMENT

In support of their efforts to delay the EEO audits the Broadcasters cite no mandamus case law or any other case law that seeks to justify this requested relief. Nor could they—there is no justification for invoking the extraordinary writ of mandamus to alter the course of the FCC's EEO implementation in mid-stream. The writ simply does not apply in this context. Even if the Petition were analyzed as a request for an emergency stay pending appeal (which the Petition is not, and which would be procedurally improper), relief still would not be warranted.

1. Courts Cannot Guide the Exercise of Discretionary Duties Through a Writ of Mandamus.

It is well established that the extraordinary writ of mandamus is not available to control conduct over which an agency has discretion. Instead, a writ of mandamus is available only in situations where "the duty to be performed is ministerial and the obligation to act peremptory, and clearly defined." 13th Reg. Corp., 654 F.2d at 760 (quoting United States ex rel. McLennan

v. Wilbur, 283 U.S. 414, 420 (1931)); see also Colon v. United States Dep't. of State, 170 F.3d 191, 191 (D.C. Cir. 1999) ("the duty must be clear and indisputable") (quoting United States ex. rel. McLennan, 283 U.S. at 420). "[C]ourts do not have authority under the mandamus statute to order *any* government official to perform a discretionary duty." Swan, 100 F.3d at 977; see also Ganem v. Heckler, 746 F.2d 844, 853 (D.C. Cir. 1984) (mandamus "cannot be used to compel or control a duty in the discharge of which by law [the government agent] is given discretion") (quoting Work v. United States ex rel. Rives, 267 U.S. 175 (1925)). Discretionary duties are those that involve "judgment, planning, or policy decisions." Swan, 100 F.3d at 977 (internal quotation marks and citations omitted).

There can be no doubt that the FCC's design, conduct, and timing of EEO audits is discretionary in nature. How the FCC chooses to ensure that licensees operate in the public interest is left largely to the agency's discretion by the Communications Act. To fulfill that mandate, the Commission enacted EEO Rules that proscribe discrimination. Crafting those EEO Rules required a great deal of "judgment, planning, [and] policy decisions." The Petitions to Reconsider that the broadcasters would like to see expedited do not challenge the agency's authority to pursue an EEO policy, but rather take issue with discrete "policy decisions" made by the Commission. The audits are themselves the result of a great deal of "judgment" and "planning." Moreover, the FCC has made clear that it wants to conduct audits of compliance with the regulations as they have existed since March 2003, and not wait to test compliance with the regulations as they may be modified in the future. This is a classic subject of agency discretion that cannot be interfered with through the extraordinary remedy of mandamus.

2. The Broadcasters Have Other, Adequate Means to Redress Any Speculative Injury Resulting from the Audits.

Even if the Court were to look beyond the discretionary nature of the audits, which it cannot do, there would be no basis to delay the audit process through mandamus. That is because, in addition to showing "a plainly defined and nondiscretionary duty on the part of the defendant", a petitioner seeking a writ of mandamus must show that there is "no other adequate remedy, either judicial or administrative, available." Ganem, 746 F.2d at 852. The Broadcasters cannot make that showing.

Responding to the audits, by itself, causes no injury. The Broadcasters' primary concern is that the FCC could in the future use the information gathered from the audits to sanction EEO violators. Additional proceedings would be required, however, before the FCC would impose any penalty on a licensee for EEO violations. The FCC most likely would initiate a forfeiture proceeding, which could result in a financial penalty. See 47 U.S.C. § 503(b). On its own initiative or based on a petition from a third party, the FCC also could evaluate a station's EEO compliance during the license renewal period. See 47 U.S.C. § 309(d)(2).

In either scenario, the broadcaster would have an opportunity to be heard before the Commission, see 47 U.S.C. §§ 309(e) & 503(b)(4), and ultimately a right of appeal. Thus, there are ample alternative means for broadcasters to redress any harm that could result, however tangentially, from the audits without a writ of mandamus.

3. Alternative Analyses Lead to the Same Result: The Petition Must Be Denied.

Under the mandamus analysis one never reaches many of the broadcasters' substantive contentions because the writ of mandamus is completely inapposite for the broadcasters' request that EEO audit responses be delayed. Employing the analysis that this Court uses for stay requests at least provides an avenue for examining the Broadcasters' substantive arguments—

and the flaws therein. It must be emphasized, however, that the Broadcasters do not seek to stay the audits until the appellate process has run its course—there is no appeal pending, and in any event, the Broadcasters ask only to delay the audits until further agency action (review of the petitions for reconsideration) is completed. Thus, while the test for a stay pending appeal may be useful for analytical purposes, it does not govern this Petition.

This Court reviews petitions to stay agency action using a four-factor analysis:

1. the likelihood that the moving party will be irreparably harmed absent a stay;
2. the prospect that others will be harmed if the court grants the stay;
3. the likelihood that the petitioner will prevail on the merits of the appeal;
4. the public interest in granting the stay.

Virginia Petroleum Jobbers Assoc. v. Federal Power Comm'n., 259 F.2d 921, 925 (D.C. Cir. 1958); Cuomo v. U.S. Nuclear Regulatory Comm'n., 772 F.2d 972, 974 (D.C. Cir. 1985). Like mandamus, a stay of agency action is "extraordinary relief" not readily granted by the courts. Virginia Petroleum Jobbers, 259 F.2d at 925. In this case, while the prospect of harm to others does not readily apply, all other factors point squarely toward rejecting the Broadcasters' request.

a. Broadcasters Will Suffer No Irreparable Harm by Completing the Audit Letters.

In order to justify a stay of agency action, the movant would have to "demonstrate that the injury claimed is 'both certain and great.'" Cuomo, 772 F.2d at 976 (quoting Wisconsin Gas Co. v. FERC, 758 F.2d 669, 674 (D.C. Cir. 1985)); see also Reynolds Metals Co. v. FERC, 777 F.2d 760, 762-63 (D.C. Cir. 1985). The Broadcasters can do neither.

If the Court properly denies the request to put off the audits, the only certain consequence will be that stations will have to complete their responses and submit records to the FCC. The

Broadcasters contend that doing so now "subjects stations to the unnecessary and substantial time and expense of completing audit forms under the current set of rules and then having to re-do audits after reconsideration is completed." Petition at 9. It is well established, however, that "[m]ere injuries, however, substantial, in terms of money, time and energy necessarily expended in the absence of a stay are not enough." Virginia Petroleum Jobbers, 259 F.2d at 925. Here, the time and energy required to respond to the audit letter actually are modest; the letter asks only for answers to seven questions and copies of documents that the stations are already required to maintain for purposes of responding to FCC audit requests.

The Broadcasters' main argument for delaying the audits is not that completing them now would be unlawfully onerous, but that the FCC could in the future use the information gathered from the audits to sanction EEO violators. In other words, it is not filling out the audit responses that may injure the Broadcasters' members, but the hypothetical sanctions that could follow. Because the audit responses will be publicly available, third parties (such as the EEO Supporters) could object to stations' license renewals, drawing the agency's attention. According to the Broadcasters, "[t]his is a present risk." Petition at 8. The Broadcasters also take great pains to describe the audit letter as a "serious, enforcement investigation by the FCC." Id.

This theory of injury is flawed for two fundamental reasons. First, it is entirely speculative. The FCC or third parties *could* use the audit responses *at some time in the future* to identify violations of the current or subsequently revised EEO rules that *may* result—after further proceedings—in sanctions against a violator. As discussed above, to justify a stay, a movant's "irreparable harm" must be certain; here the likelihood that any particular station (or

any station at all) will be sanctioned as a result of their audit responses is low and indeterminate.[4] See Reynolds Metals, 777 F.2d at 763.

The second flaw is that the Broadcasters' claims are not ripe. The Broadcasters characterize the audit letter itself as an enforcement action, but a penalty could only come after additional proceedings take place. The FCC could initiate a forfeiture proceeding, or it could raise a station's EEO compliance during the license renewal period. See 47 U.S.C. §§ 309(d)(2) & 503(b). The broadcaster would have ample opportunity to be heard before the Commission, and ultimately a right of appeal, in either scenario.

b. The Broadcasters Could Not Prevail on the Merits.

There is not much of a "merits argument" pending with regard to the EEO audit procedures on which the Broadcasters could prevail if the audits were delayed. None of the petitions for reconsideration before the FCC address the audit provisions, and the Media Bureau has already rejected the Broadcasters' arguments that aspects of the audit procedures are improper. The Broadcasters do not even ask this Court for a ruling that the audit letters must be changed. Rather, they ask only that the audits be delayed—even though the Broadcasters do not contest the FCC's authority to conduct the audits at this time.

Nonetheless, the Broadcasters do argue in their petition that the audit procedures are improper in three ways:

1. Filing audit responses in stations' public files purportedly contravenes the FCC's "customary practice." Petition at 7.

2. The FCC hypothetically could seek audit responses this year from more than the approximately five percent of licensees anticipated by the EEO rules. Petition at 12.

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[4] It is also unclear why the Court should be sympathetic to broadcasters whose "injury" is having their own discriminatory conduct revealed and penalized.

3. The audit letters ask for more information than the EEO rules contemplated would be "initially" requested. Petition at 13.

The FCC established the audit protocol in order to implement the EEO rules as it understood them. The Media Bureau has already considered the Broadcasters' arguments and reaffirmed that the audit procedures are consistent with the Commission's rules. See Ferree Letter, Ex. 5. An agency's interpretation of its own rules is entitled to substantial deference, and can only be overturned if it is arbitrary and capricious. MCI Worldcom Network Servs., Inc. v. FCC, 274 F.3d 542, 546-47 (D.C. Cir. 2001). Far from arbitrary, the audit procedures are consistent with the EEO rules and well within the FCC's authority. Thus, the Broadcasters could not prevail on "the merits."

The Broadcasters first argue that the FCC should keep the audit results confidential, rather than require that they be placed in the stations' public file. Petition at 7. Although the Broadcasters contend that keeping "investigation" materials confidential is the FCC's "usual and customary practice," in fact the FCC rules require that "[m]aterial relating to [an] FCC investigation or complaint" must be maintained in a station's public file.[5/] 47 C.F.R. 73.3526(e)(10); Ferree Letter at 2, Ex. 5. The Broadcasters do not argue that the FCC lacks the authority to make the audit results available to the public, or that doing so contravenes the EEO rules. That limitation in the Broadcasters' argument is fatal.

Next, the Broadcasters argue that the FCC might send audit letters to more than the five percent of all licensees anticipated by the EEO rules. Petition at 12; 47 C.F.R. 73.2080(f)(4). This argument is entirely conjectural, and in rejecting the Broadcasters' Emergency Request for Relief, the Media Bureau affirmed, "[W]e do not expect to audit more than five percent of

[5/] Indeed, FCC audits of cable EEO compliance have been done with full public transparency for nearly a generation.

stations . . . ." Ferree Letter at 2, Ex. 5. In any event, the Broadcasters again fail to articulate why an audit of more than five percent of licensees in any given year would be unlawful.

Third, the Broadcasters argue that the Media Bureau exceeds the authority granted by the Commission by requesting, through the audit letters, more information than is immediately available in the stations' public files. This argument is based entirely on a constrained and selective reading of paragraph 155 of the Review of EEO Rules, 17 FCC Rcd 24018, 24066 (2002). That paragraph reads in part: "Initially, the inquiry may request the contents of the station's public file." However, *the very next sentence* states that "[f]urther inquiry or inquiries may be conducted requesting additional documentation of recruitment efforts that is not in the public file." And in the section of the Order dealing with recordkeeping, the Commission explicitly stated:

> We will require broadcasters to retain documentation concerning their compliance with the three recruitment prongs, as proposed in the Second NPRM. This documentation must be retained by the station, but will not be routinely submitted to the Commission. ***The data must, however, be provided to the Commission upon request in the event of an investigation or audit.*** The documentation includes: (1) listings of all full-time job vacancies filled by the station employment unit, identified by job title; (2) for each such vacancy, the recruitment sources used to fill the vacancy (including, if applicable organizations entitled to notification, which should be separately identified), identified by name, address, contact person and telephone number; (3) dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing vacancies; and (4) documentation necessary to demonstrate performance of the Prong 3 menu options, including sufficient information to disclose fully the nature of the initiative and the scope of the station's participation, including the station personnel involved. This documentation will allow us to verify compliance with our rules; . . . .

Id., 24060, ¶ 132 (emphasis added). The types of documents listed are just the sorts of materials that the audit letter requests, and the Commission's Order puts broadcasters on notice that such data "must . . . be provided to the Commission . . . in the event of an investigation or audit." Id. On this argument, like the others, the Broadcasters have no likelihood of success.

Finally, the Broadcasters provide five examples of how the audit letters could, hypothetically, prove more useful to the Commission and be clearer to the stations that are completing them after the Petitions for Reconsideration are resolved. Petition at 9-12. In this discussion, the Broadcasters mention "Equal Protection" and "the First Amendment", but without any explanation, analysis, or citation. Once one cuts through the speculation and conjecture, it is clear that none of the examples allege that the audit questions are beyond the FCC's authority or in contravention of a Commission rule. Thus, the examples are not challenges to the validity of the audit procedures at all.

c. The Public Interest Requires that the Audits Go Forward.

Since 1968, the FCC has recognized that employment discrimination is incompatible with a broadcaster's obligation to operate in the public interest. See Petition for Rulemaking to Require Broadcast Licensees to Show Nondiscrimination in Their Employment Practices, 13 FCC2d 766, 769-70 (1968); Review of EEO Rules, 17 FCC Rcd 24018, 24030, ¶ 31 (2002). [6/] The Commission not only maintained, but also vigorously enforced, EEO regulations for the ensuing thirty years. In 1992, Congress codified and extended the FCC's then-existing EEO rules, while recognizing that having anti-discrimination rules on the books is not enough: "[R]igorous enforcement of equal employment opportunity rules and regulations is required in order to effectively deter racial and gender discrimination." Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, § 22, 106 Stat. 1460, 1498 (cited and quoted in Review of EEO Rules, 17 FCC Rcd 24018, 24027, ¶¶ 23 & 57 (2002)).

[6/] Similarly, this Court has held that intentional employment discrimination cannot be reconciled with a licensee's responsibilities as public trustee. Bilingual Bicultural Coalition on Mass Media v. FCC, 595 F.2d 621 (D.C. Cir. 1978).

The FCC's EEO rules were a success—significantly boosting the employment of women and minorities between the 1960s and the 1990s. See Comments of EEO Supporters, March 5, 1999, vol. 1, p. 46, T.1 (the excerpt is Exhibit 6). In the midst of litigation that struck down aspects of the EEO regime as unconstitutional, however, the FCC suspended its EEO rules in 2001. See MD/DC/DE Broadcasters Ass'n v. FCC, 236 F.3d 13 (D.C. Cir. 2001); Lutheran Church-Missouri Synod v. FCC, 141 F.3d 344 (D.C. Cir. 1998); Suspension of the Broadcast & Cable Equal Employment Outreach Program Requirements, 16 FCC Rcd 2872 (2001). As the chart below indicates, the percentage of minority broadcast employees plummeted over the next two years.

Job Category	% Minority 1994	% Minority 2001	% Minority 2002	% Minority 2003
Total TV News Workforce	17.1%	24.6%	20.6%	18.1%
Total Radio News Workforce	14.7%	10.7%	8.0%	6.5%
TV News Directors	7.9%	8.0%	9.2%	6.6%
Radio News Directors	8.6%	4.4%	5.1%	5.0%
TV General Managers	n/a	8.7%	5.2%	3.6%
Radio General Managers	n/a	5.7%	3.8%	2.5%

Prof. Bob Papper, "Women & Minorities: One Step Forward and Two Steps Back, The Communicator (July/Aug., 2003) (cited in Letter from Rev. Robert Chase & Gloria Tristani, United Church of Christ, to Hon. Michael K. Powell, FCC, 4/27/04 (attached hereto as Exhibit 7). According to Professor Papper, the slide in minority employment started with the suspension of the Commission's EEO rules.

Clearly, there is still a need for EEO guidelines and monitoring. One recent study found that almost a quarter of large broadcasters discriminate intentionally. See Letter from David Honig, MMTC, to Marlene Dortch, FCC, Oct. 1, 2002, at 12-17 (discussing Albert & Rose Blumrosen, The Realities of Intentional Job Discrimination in Metropolitan America—1999

(2002) (pages 1-17 of the letter are attached as Exhibit 7 hereto; the study was a lengthy exhibit to the letter). And after the EEO guidelines were suspended in 2001, 42% of the job openings listed on state broadcast association websites failed to include the formerly ubiquitous "EOE" language, which highlights that the broadcaster is an equal opportunity employer. See EEO Supporters Reply Comments in MM Docket 98-204 (May 29, 2002), pp. 28-30 (Exhibit 8 hereto).

New EEO guidelines are in effect, and have been since March of last year. They have the potential to protect the public's interest in avoiding employment discrimination, and to promote the public's interest in furthering diversity among broadcasters. But the rules will not achieve that potential unless the FCC actively monitors and enforces compliance. Even the Broadcasters accept that the public benefits from appropriate EEO regulations and from implementation of audits. Petition at 2.

In short, while the Broadcasters have no legal basis for delaying the EEO audit process, such a delay would run counter to the public's interest in implementing the audits.

CONCLUSION

For the reasons stated above, the Broadcasters' petition should be DENIED.

Respectfully submitted,

Thomas J. Mikula
David P. Huitema
Shea & Gardner
1800 Massachusetts Ave., N.W.
Washington, D.C. 20036
(202) 828-2000

David Honig
Minority Media and
Telecommunications Council
3636 16th Street, N.W., Ste. B-366
Washington, D.C. 20010
(202) 332-7005