

ශ්‍රී ලංකා ප්‍රජාතාන්ත්‍රික සමාජවාදී ජනරජයේ ගැසට් පත්‍රය  
අති විශේෂ

The Gazette of the Democratic Socialist Republic of Sri Lanka

EXTRAORDINARY

අංක 1073/1 — 1999 මාර්තු 29 වැනි සඳුදා — 1999.03.29  
No. 1073/1 — MONDAY, MARCH 29, 1999

(Published by Authority)

**PART I : SECTION (I) --- GENERAL**

**Government Notifications**

**PUBLIC HEARING ON IMPROVEMENT OF SUBSCRIBER BILLS AND RESOLUTION OF BILLING RELATED DISPUTES**

Order issued by the Committee of Inquiry appointed under Section 12 of the Sri Lanka Telecommunications Act, No. 25 of 1991, as amended by the Sri Lanka Telecommunications (Amendment) Act, No. 27 of 1996

THE Committee of Inquiry on Improvement of Subscriber Bills and Resolution of Billing Related Disputes in the fixed-access telecommunications sector issued a call for submissions from the public through the news media in August 1998. Over 450 written submissions were received in response. Having considered these submissions, the Committee invited over 40 members of the public, whose submissions were considered to be representative of the public concern, to elaborate upon their written submissions in person before the Committee. Hearing of the first phase, intended to identify the nature and scope of the problem, were held in Colombo on 08th, 13th, 14th and 15th October and in Kandy on 09th October, 1998, with the participation of the public and the fixed-access operators. The written submissions of the public were made available to the public and the fixed-access operators for examination. The three fixed-access operators were invited to respond to the submissions at the conclusion of the first phase hearings. Having considered the information gathered in the first phase, the Committee formulated and distributed a set of issues to all three fixed-access operators. In the second phase of the hearings, conducted in Colombo on 05th, 06th and 07th January, 1999, evidence was heard from persons with expertise in matters related to billing and billing-related disputes. The fixed-access operators were invited to present their positions at the conclusion of the second phase hearings. Having considered the information elicited in the course of the hearings, the Committee issues the following order under Section 12 (12) of the Sri Lanka Telecommunications Act, No. 25 of 1991, as amended :

*1.0 Itemized Billing Information*

- 1.1 The Committee of Inquiry orders all fixed-access operators (namely, Sri Lanka Telecom Limited (SLTL), Suntel (Private) Limited, and Lanka Bell (Private) Limited) to provide itemized bills to all subscribers, except to operators covered by approved or determined Interconnection agreements but subject to paragraph 1.1.2 below, according to the following schedule :
  - 1.1.1 Suntel and Lanka Bell currently provide itemized bills for international, national and local calls. They must continue to do so as part of their licence obligations. The conditions for providing the bills are specified within this order.
  - 1.1.2 SLTL currently provides itemized bills for all international calls and must continue to do so as part of its licence obligations, subject to the provisions of this order. Itemized international bills must be provided free of charge to all operators who utilize the international gateway to provide services.

N.B.—Gazette Extraordinary Series No. 1072/1 ends with No. 1072/18.

1.1.3 As part of its licence obligations, SLTL must act expeditiously to provide itemized billing in all exchanges, completing exchanges in Metropolitan Colombo by 31st December, 1999 and exchanges in the entire island by 31st December, 2000. The conditions for providing the itemized bills are specified within this order.

1.2 *The Committee of Inquiry orders that itemized bills shall be provided subject to the following conditions :*

1.2.1 Each fixed-access operator is obliged to provide itemized information regarding each of the services specified in the relevant licence condition and is encouraged to present this information to the subscriber in an easily understandable fashion. Each operator is encouraged to maintain a mechanism for obtaining consumer complaints and suggestions regarding the presentation of the invoice.

1.2.2 Each fixed-access operator shall provide itemized information on the charges for messages costing Rs. 15 and above (excluding taxes), free of charge to all subscribers. Subscribers may decline this facility in writing and the operator shall honour such request with effect from the subsequent bill. The threshold for free itemization will remain unchanged until and unless the Commission changes it. An operator may petition the Commission to revise the threshold for free itemization.

1.2.3 Each fixed-access operator shall offer itemized information for all messages to any subscriber on request. The tariffs for this service shall be submitted to the Telecommunications Regulatory Commission for approval or information per each operator's licence conditions.

1.2.4 Each fixed-access operator shall offer up to three complete itemized bills, including details of calls below the threshold specified in paragraph 1.2.2 above, per year to a subscriber who has a billing dispute with the operator. The subscriber may be charged the current tariff for itemized bills beyond this limit. The subscriber must request the bills in writing clearly stating the relation to the billing dispute. The availability of up to three free itemized bills must be stated in the operator's written procedures re billing disputes that shall be made available to subscribers.

1.2.5 SLTL shall submit a schedule for the implementation of itemized billing conforming to paragraph 1.1 of this order to the Telecommunications Regulatory Commission by 30th April, 1999, specifying implementation by individual exchange. The Commission has the discretion under the provisions of the Act and the conditions of the licence to approve or modify the schedule. Conditions 1.2.1 — 1.2.4 above shall come into effect for the respective exchanges on the dates specified in the approved schedule. Conditions 1.2.1 — 1.2.4 above shall come into effect for Suntel and Lanka Bell on June 30, 1999 or at an earlier date set by the operator.

1.3 *Reasons for Order on Provision of Itemized Information.*—Through a large number of written submissions as well as through oral evidence before the Committee, subscribers strongly argued for itemized bills. The explicit licence conditions mandating the provision of itemized billing information (Condition 23 for Suntel and Lanka Bell and Condition 25 for SLTL) were also taken into account by the Committee of Inquiry. The Suntel and Lanka Bell licences set out absolute requirements. "The Operator shall be obliged under paragraph 23.1 to specify charges for each message separately in invoices" (paragraph 23.2 of Licence). The parallel obligation for SLTL is conditional : "The Operator shall not be obliged under paragraph 25.1 to specify charges for each message separately in invoices until it has installed the necessary billing system in the area in which the service to which the invoice relates is provided. The Operator shall consult with the Authority [Commission] on measures for installation of such billing system" (paragraph 25.2 of Licence). It must be noted that the SLTL licence was issued in 1991 and that no action to comply with the condition had been taken for more than seven years. In the course of the Public hearing, SLTL voluntarily committed to providing itemized billing in a phased manner, starting around April 1999 in certain Colombo exchanges. The specific reasons for the order regarding itemized information are :

1.3.1 The licence conditions specify itemized billing, the Committee of Inquiry must act within the framework of the licence conditions.

1.3.2 It is clear from the public submissions that there is almost universal distrust of the billing currently provided by SLTL. While it is possible that the distrust is not based on accurate facts and that there is less fraud and error in the system than is suggested by the public comments, it is imperative that action be taken to build trust, which is an essential element of any service relationship. While costly to the environment, the operator, and the subscriber, there is no better option than increasing the transparency of the process through the provision of itemized information on calls.

- 1.3.3 The costs to the environment and the operator can be reduced by the requirement that free itemization be provided only for calls costing above a certain threshold. The threshold is set at the approximate price of a three-minute national call at the midpoint of the rate-rebalancing process. In a country like Sri Lanka where the differential between local and national calling charges is small, it is more appropriate to mandate free provision of high-value calls than free provision of national calls as is done by Lanka Bell at present.
- 1.3.4 The charge for itemized information falling outside the mandated parameters for free provision is a tariff. These tariffs must be approved per the relevant provisions of the Act and the licences.
- 1.3.5 Given the concern that subscribers may abuse a provision that requires the free supply of complete itemized bills, a limit of three free bills per year is set per subscriber.
- 1.3.6 The conditions shall come into effect depending on each operator's readiness to supply the service. SLTL will face some challenges in completing the transition to itemized billing. Therefore, SLTL is allowed to negotiate its specific implementation schedule with the Commission subject to the broad targets set in this Order.

## 2.0 *Time-Based Charging*

- 2.1 The Committee of Inquiry orders that all fixed-access operators move to time-based charging as quickly as possible. The Committee understands that Sunte! and Lanka Bell are currently using time-based charging. The transition to time-based charging is tied to the introduction of itemized billing. Therefore, the Committee does not impose a specific time-table on SLTL which currently operates on a pulse-based system, but trusts that SLTL will act expeditiously to introduce this more modern form to its system. The Committee makes no ruling on the time unit for billing. Operators can make judgements on the appropriate billing unit based on their specific market and cost consideration.

## 2.2 *Reasons for Order re Time-Based Charging*

Billing is the most important form of communication between a subscriber and an operator. In a competitive market place, it assumes an increased importance. It is essential that subscribers must be able to understand the price signals communicated by the bill. The pulse-based system fails in this regard. It is essential that the easier to understand time-based system be introduced as quickly as possible. Operators may decide on the appropriate unit for charging, the Committee feels that short duration units are superior, but leaves that issues to the market place to decide.

## 3.0 *Format of Bills*

- 3.1 Subject to the Order re Itemized Billing Information, The committee orders the fixed access operators to improve the format of the bills presented to subscribers in the following manner:
  - 3.1.1 Provide at a minimum the following information in columnar form in an itemized bill. The date of the (start of) the call ; start time ; duration of the call ; charging category and the charge for the call excluding taxes.
  - 3.1.2 The total charge must be presented in a summary sheet which should clearly indicate the applicable taxes and the rates and formulate of computation of such taxes; the charging categories and rates must be clearly stated in the bill.
  - 3.1.3 Subscribers who so request must be provided the bill in Sinhala or Tamil within one year of the date of this order. Symbols, if any, may be shown in English only, but such symbols must be clearly explained in Sinhala and/or Tamil. The default language of the bill may be English. An operator may choose to provide a single bill in all three official languages.

### 3.2 *Reasons for Order on Format of Bills*

In the written and oral submissions subscribers complained of difficulties caused by the format (including in particular, the brevity and language of the bill). They complained of the difficulty of understanding the information presented in the bill. The complaints regarding language of the bill focused on the non-availability of Suntel and Lanka Bell bills in Sinhala and Tamil. The Committee found that many complaints regarding taxes had been caused by an erroneous translation into Sinhala of the phrase "monthly rental" by SLTL, which has since been corrected. Therefore, the Committee has not made an order about it. The Committee believes that the order regarding format will provide a useful framework for the operators in improving the communicative aspects of their bills.

### 4.0 *Periodicity of Bills*

4.1 Within the overall framework of the licence condition on periodicity of billing (Condition 22.2 for SLTL and Condition 20.2 for Suntel and Lanka Bell), the Committee of Inquiry orders the fixed-access operators to improve the periodicity of their bills by taking the following measures :

- 4.1.1 Mail out the bills to their subscribers within 7 working days of the end of the billing cycle, which must be clearly indicated on the face of the bill. This shall be effected within a period of one year from the date of this order.
- 4.1.2 Migrate to multiple billing cycles a month within six months of this order. In other words, the subscriber base should be divided into multiple billing groups and the processing of the bills of the different groups must be done at different times of the month.
- 4.1.3 Automate the transfer of billing records from exchanges to the billing centers within two years of the date of this order, taking necessary safeguards to ensure the integrity of the process.

### 4.2 *Reasons for Order on Periodicity of Bills*

The written and oral submission contained complaints that payments were not accurately reflected in the bills, that bills were not regularly presented, and that there were delays in billing. These actions on the part of SLTL appear to have constituted *prima facie* violations of Licence Conditions 22.2. The Committee notes that during the past few years and in particular the past few months SLTL has made significant improvements in improving periodicity of billing. However there is room for improvement in relation to preventing arrears appearing on the bills of subscribers who have made payments on time. This problem is caused by certain shortcomings in the way that SLTL processes its bills. SLTL manually transfers their billing records from exchanges throughout the island to the single billing center located in Colombo and then physically transports the printed bills back to the regional exchanges where they are mailed out. This current procedure causes a peak load on the billing facilities because the billing records of all of SLTL's subscribers are processed at one time. The Committee notes that at least one other company has successfully overcome this problem by having multiple billing cycles. The Committee believes that bills can be dispatched to subscribers within seven days once the specified remedial measures are taken.

### 5.0 *Payment of Bills*

- 5.1 The Committee orders the fixed-access operators to give subscribers at least seven working days to settle the bills from the reasonable date of receipt of the bill. This shall be applicable irrespective of the mode or place of payment. Under no circumstance shall a subscriber who has made payment by the date specified in the bill be penalized. A subscriber who is so penalized by an operator shall be compensated at the rate of Rs. 250 per day for the period of such penal action. In addition to the daily compensation, the operator shall offer free reconnection if disconnection was the penal action effected.

## 5.2 *Reasons for Order re Payment of Bills*

One of the results of problems in the periodicity of billing is the non-inclusion of payments in the subsequent bill. In some cases, this has led to penal action by the operator and caused considerable pain of mind and inconvenience to subscribers. The Committee believes that greater co-ordination between banks and operators who are large and important customers of the banks is possible. The onus must be on the operators to ensure that payments are promptly credited. The order will create the proper incentives for the operators to improve their processes and create safeguards against harm being caused to innocent subscribers.

## 6.0 *Confidentiality of Billing Information*

6.1 The Committee of Inquiry orders all fixed-access operators to adhere to the provisions of their respective licence conditions re-confidentiality of customer information. The following directions must be read in conjunction with the licence condition.

6.1.1 The Operators who have not yet submitted draft codes of practice to the Commission are ordered to do so by May 31, 1999.

6.1.2 Upon the Commission approving the code of practice, the operator shall prepare a manual on the confidentiality of customer information, which shall be submitted to the Commission for information. The operator shall establish a schedule of training workshops to educate its employees about the procedures set out in the manual. The Commission shall be informed of such workshops and be invited to send observers. Each operator shall hold at least one workshop before 31st December, 1999.

6.1.3 Each operator shall minimize the number of employees having access to billing information that is individually identifiable. A list shall be maintained of all such employees and each of these employees shall attend a training workshop on the subject and sign a confidentiality agreement covering all individually identifiable customer information.

6.1.4 Each operator shall issue some kind of password or establish a mechanism (e.g., mother's middle name) to ensure that no one other than the subscriber can gain access to billing and other customer information. This mechanism shall be set in place for inquiries in person, via letter, or over the telephone, or in the event Internet access is introduced, via Internet.

6.1.5 All bills shall be transmitted to subscribers in sealed, non-transparent envelopes without the telephone number being displayed on the outside of the envelope. The safeguard specified in 6.1.4 above must be activated in the case of a request for a copy of a bill.

6.2 Reasons for Order on Confidentiality of Billing Information confidentiality issues were raised before the Committee through written and in oral evidence. The licences of the fixed-access operators contain specific conditions regarding confidentiality of customer information (Condition 26 for SLTL and Condition 24 for Sutel and Lanka Bell). With the exception of Lanka Bell, this condition has been observed in the breach. With the introduction of itemized billing by SLTL (which has almost 90% of the fixed-access market), the importance of safeguarding the confidentiality of customer information increases by an order of magnitude. The pattern of interactions recorded through itemized bills can yield sensitive information. What the Order seeks to do is to provide a more detailed procedure for implementing the licence conditions in a manner that addresses the public interest.

## 7.0 *Home Metering*

7.1 The Committee of Inquiry makes no order on the issue of home metering, considering the introduction of itemized billing to address more effectively the concerns sought to be addressed by this remedy.

## 7.2 *Reasons for Decision on Home Metering*

Home metering addresses the same problem addressed by itemized billing : the lack of information provided to a subscriber on his/her telephone use by SLTL. Having ordered the operators to implement itemized billing which is the solution set out in the licence conditions, the committee sees no value in ordering this unproven, costly and ineffective solution to be implemented. The installation of home meters for all subscribers will be very costly. The likelihood of tampering cannot be ruled out. As a result, the operators cannot be compelled to accept the readings from home meters over their own measuring devices. The Committee found that Mr. Nalin Karunasinghe's invention may be useful for those managing communication centers, but that it would be of little value in residential settings.

## 8.0 *Fraud*

8.1 The Committee of Inquiry having considered the representations of both subscribers and service providers makes the following order :

8.1.1 In the event of a billing dispute, operators must make all reasonable efforts to exclude the possibility that fraudulent use has occurred, and be primarily responsible for minimizing its occurrence and for detecting such fraudulent use whenever it takes place. The onus is on the Operators to come up with ways and means of achieving these ends.

8.1.2 Fraudulent use is extremely difficult for the subscriber to detect and document, especially in the absence of itemized bills. Therefore the subscriber should receive the benefit of the doubt in the context of a dispute where there is reasonable grounds for suspicion that fraudulent use has occurred.

8.1.3 Operators should offer substantial rewards for providing information relating to fraudulent use, and for the successful prosecution of offenders under Section 46 of the Sri Lanka Telecommunications Act, No. 25 of 1991, as amended.

8.1.4 Operators should ensure that all their employees who work on their outside plant wear uniforms and identification and are easily recognizable as authorized persons.

8.1.5 Operators should give wide publicity to the efforts made by them to eliminate fraudulent use in order to enhance consumer confidence and trust in the accuracy of their bills.

8.1.6 Operators are required to submit reports on actions taken under the provisions of this Order to the Commission by December 31st of each year, starting in 1999.

## 8.2 *Reasons for Order on Fraud*

Fraudulent use is defined for the present purposes as the gaining of illegal access to a subscriber's service beyond the subscriber's premises by accessing the cable system or by illegal interference with charging or billing systems resulting in the allocation of call charges to subscribers who should not be charged for those calls. Complaints were received from subscribers alleging the fraudulent use of their lines in spite of all reasonable precautions being taken by the subscribers to prevent unauthorized access within their premises. There were several complaints that described situations where subscribers had been billed far in excess of the estimated number of calls, while the owners ruled out any possibility of the phone being legitimately used to the extent billed. This had led to suspicion that subscriber's lines were being used by unauthorized persons, with the charges debited to the owners of the telephones. Despite the best efforts of the Committee, it was not possible to establish the existence of a pattern of fraudulent activity by individuals or groups within or outside the operator companies. The Committee considers the widespread belief of fraud to be detrimental to the development of the telecommunication industry and urges the operators to take steps even beyond those specified in the Order to alleviate the fears of the public.

9.0 *Standards for Accuracy of Charging and Metering Devices*

9.1 In the context of the relevant Licence Condition (22.1 in the case of SLTL and 20.1 in the case of Suntel and Lanka Bell), the Committee of Inquiry orders each fixed-access operator to submit to the Commission a proposed set of standards it is willing to be held to with regard to ensuring the accuracy and reliability of charging and metering devices. The standards may be foreign standards or adaptations thereof. Each standard must include specific measurements, targets and schedules for the achievement of targets. The operators are required to submit these standards for approval to the Commission by December 31, 1999. At its discretion, the Commission may require modifications or approve the standards as submitted.

9.2 *Reasons for the Order on Standards for Accuracy of Charging and Metering Devices* Considerable concern was expressed during the Hearing about the possibilities of malfunctions on metering and charging equipment that could result in unfair treatment of subscribers. Formulating and enforcing proper standards for metering and charging equipment can reduce the chances for error and improve the credibility of the operators in their dealings with subscribers. The Committee believes that, the wide differences among the networks preclude the imposition of one standard for all fixed-access operators. The Committee considers it to be in the interest of the operators to co-operate with the Commission in establishing a viable self-regulatory arrangement for the enforcement of the relevant licence condition in order to reduce the unproductive levels of distrust that currently exist among subscribers. In the event that operator co-operation is not forthcoming, the Commission has the option of taking action to directly enforce the licence condition.

10.0 *Dispute Resolution*

10.1 The Committee of Inquiry makes the following order on billing related dispute resolution.

10.1.1 Operators should establish procedures for the handling of billing related complaints. These procedures must be compiled in easily understandable form in all three official languages and must be given due publicity.

10.1.2 Each operator must establish an internal billing-dispute committee that is independent of the department with responsibility for billing. This committee must render a decision within 3 months of complaint, or the completion of the compilation of evidence.

10.1.3 All information which may be helpful in the investigation of billing-related complaints must be collected and made available to the billing dispute committee.

10.1.4 Operators shall retain in archives for verification purposes meter readings, records of test calls made on a subscriber's service, faults affecting a subscriber's service and repairs made and equipment replacements which could affect the subscriber's charging. The records kept should be sufficient to enable an Operator to make restitution to subscribers in case of an overcharging error. These records should be retained for a period of at least two years and for a longer period in the case of unresolved disputes.

10.1.5 Collect calls form a special category of dispute because not all the information necessary for their resolution is available to the operator. The operators are ordered to give as much information as possible to subscribers and also to explore mechanisms for blocking collect calls as has been done in some other countries. SLTL is ordered to submit a report on solutions for collect-calls disputes to the Commission by December 31, 1999.

10.1.6 While the operator may ask a subscriber to pay the undisputed portions of the bill, it must not compel the subscriber to pay the disputed parts before the billing-disputes committee has delivered its decision on that subscriber's dispute. In the event the subscriber chooses to appeal that decision to the Commission, the operator may not disconnect the subscriber's telephone without the Commission's permission.

10.2 *Reasons for Orders re Dispute Resolution.*

The written and oral submissions made to the Committee revealed the urgent necessity of complaint-handling mechanisms being put in place by Operators. The current procedures tended to discourage subscribers from pursuing their complaints with a view to obtaining redress within a reasonable time frame. Creating clear, well-publicized procedures and a relatively independent dispute resolution body within each operator can help reduce the current levels of unproductive friction.

11.0 *Errors in and/or Unavailability of Billing Records*

11.1 The Committee of Inquiry orders that an operator shall bear the loss arising out of a situation where a billing record is erroneous or is unavailable. No operator shall charge average or other unsubstantiated amounts in these situations. The order shall apply to possible effects of the Y2K problem.

11.2 Reasons for the Order re Errors and/or Unavailability of Billing Records. The Committee heard evidence of several instances where an operator had charged average or estimated amounts when billing records were unavailable or erroneous. This is patently unfair. If there is an error in the billing record or if the billing record is unavailable the subscriber should not be penalized as it is not his/her fault.

12.0 *Taxation :*

12.1 The Committee makes the following orders and decisions on the issue of taxation:

12.1.1 *Goods and Services Tax on Monthly Rental :*

The Committee requests the Commission to re-appeal to the Government to consider amending the relevant legislation to exempt rentals from GST in the case of all residential subscribers.

12.1.2 *National Security Levy :*

The Committee orders the operators to charge the NSL at the currently applicable rate, on the gross invoiced value excluding NSL. The Committee notes that this is the amount that the operators would be liable for if the NSL is borne by the company. The Committee believes that this action will help reduce the considerable confusion surrounding this levy. Because there is discretion with regard to passing on the National Security Levy to subscribers, its imposition on subscribers falls within the definition of a tariff increase. Therefore, operators are directed to comply with the relevant statutory and licence conditions for tariff approvals within six months from the date of this Order.

12.2 *Reasons for Order and Decision re Taxes :*

12.2.1 In written as well as oral submissions before the Committee, subscribers were quite vociferous about several alleged anomalies in the taxation process. These primarily related to the interpretation and application of the Goods and Services Tax (GST) and the National Security Levy (NSL) to telecommunication services. Both being matters outside the scope of the Sri Lanka Telecommunications Act, No. 25 of 1991, as amended, the Committee was compelled to summon senior officials of the Department of Inland Revenue to the Hearing. The Committee gratefully acknowledges the contribution made by these officials. The officials clarified that the role of the Department of Inland Revenue is limited to the interpretation of the regulations and collection of taxes. The main argument advanced by the members of the public was that monthly rental, being a recovery over an extended period of the cost of providing connectivity to the network, should not be liable for GST. However, the Department of Inland Revenue is of the view that except in the case of zero-rated or exempted items all other items are subject to GST at the point of invoice, from April 1, 1998 (the date of implementation of GST). Since this is a pass-through tax the operators have no alternative but to pass it on to the consumers. Whereas business subscribers can set it off against the output GST the residential consumers have no such recourse. However, the Committee is persuaded that no relief can be provided without amending the relevant legislation.



12.2.2 The Committee noted that operators were levying NSL in a way that minimized financial impact upon themselves, and maximized confusion and anger against the government amongst subscribers. The complicated formula used in the computation of this tax results in NSL being charged on NSL. NSL is payable on gross invoiced value including all taxes that are passed on to the subscribers. While the operator has to pay the tax on this basis, there is no compulsion to levy subscribers at a rate that is over and above the announced rate. Because the operators are not compelled to pass on the NSL to subscribers, there is no reason why they cannot simplify its application. The discretionary nature of the passing on of this tax would necessitate approval by the Commission under the relevant statutory and licence provisions for tariff regulation.

Professor ROHAN SAMARAJIVA,  
Chairman of the Committee of Inquiry.

PALITHA SILVA GUNAWARDENE,  
Member of the Committee of Inquiry.

KIDNAPILLAI SELVARAJAH,  
Member of the Committee of Inquiry.

17th February, 1999.

04-352