

20. D&B denies the allegations contained in Paragraph 20.

XI. VIOLATIONS CHARGED

21. D&B denies the allegations contained in Paragraph 21.



3. Alternative sources of K-12 education list data to support direct mail and email programs include MCH, Agile Education Marketing, the lists of various professional

WHEREFORE, having fully answered the Complaint, D&B respectfully requests that the Commission: (i) deny the Commission's contemplated relief; (ii) dismiss the complaint in its entirety with prejudice; (iii) award D&B its costs of suit; and (iv) award D&B its reasonable attorneys' fees.

