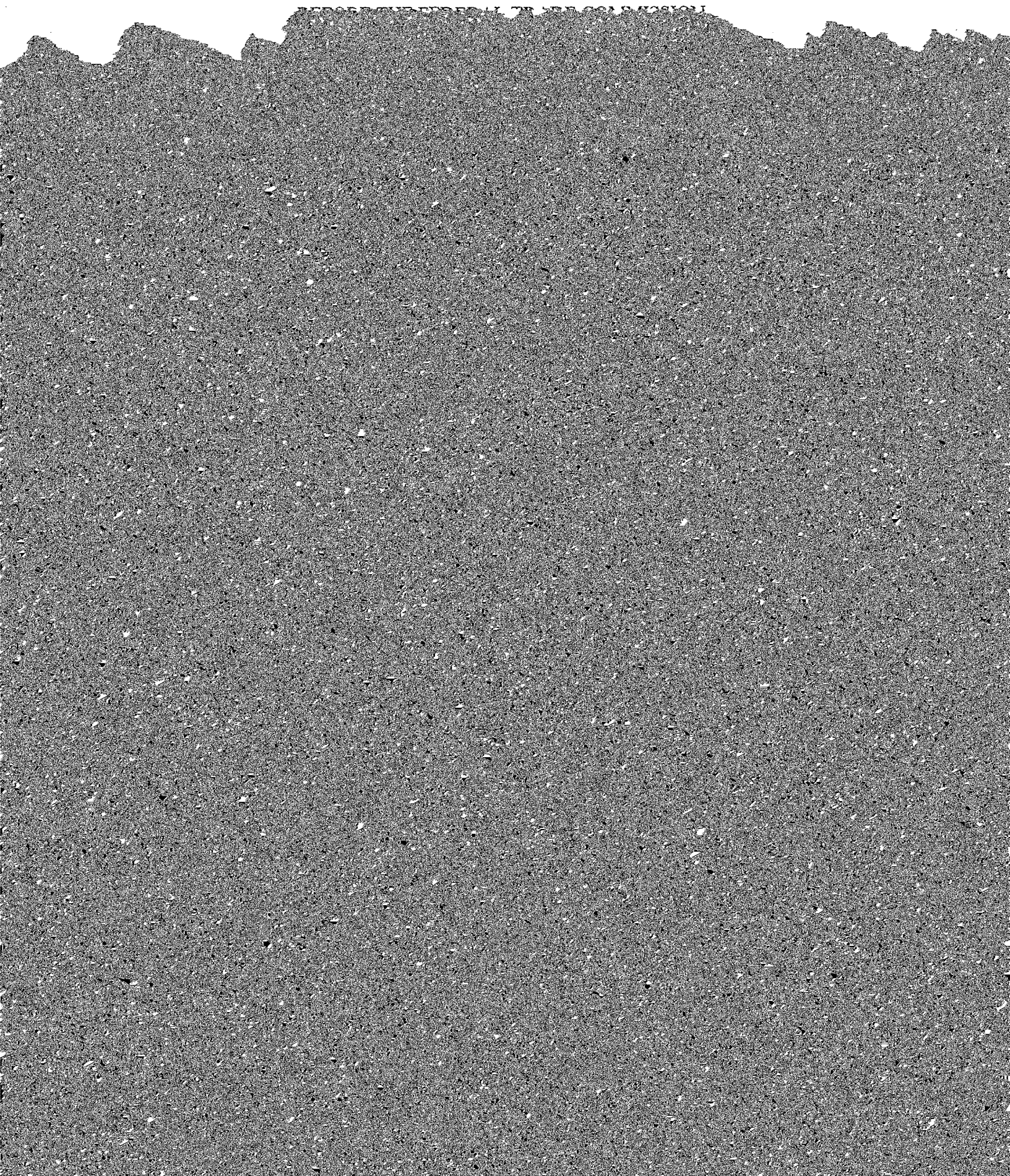




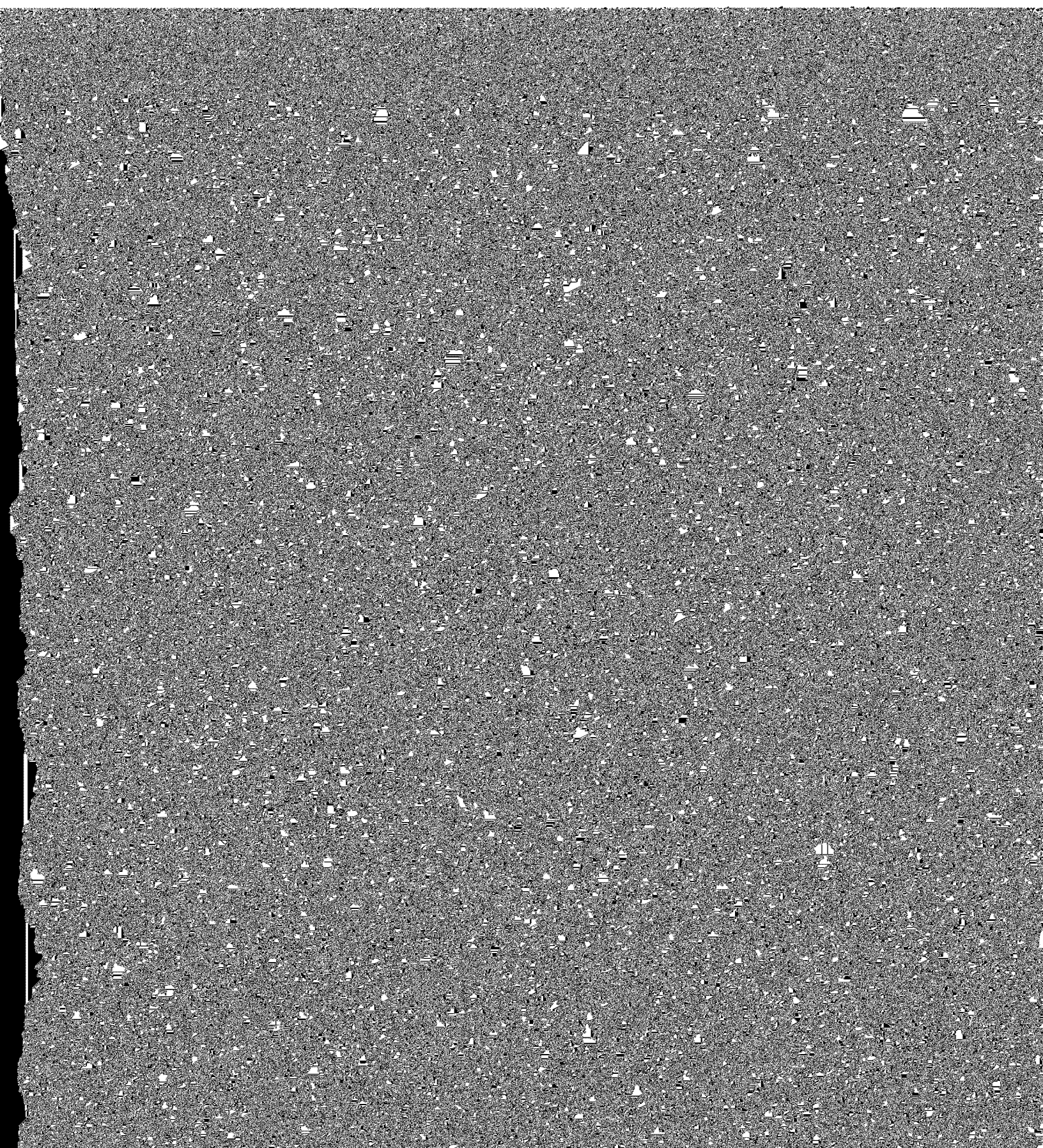
UNITED STATES OF AMERICA





**I. LEGAL STANDARD**

By this Petition, CCL does not challenge the FTC's statutory authority to investigate





The recognized standard for whether an administrative agency's subpoena should be

