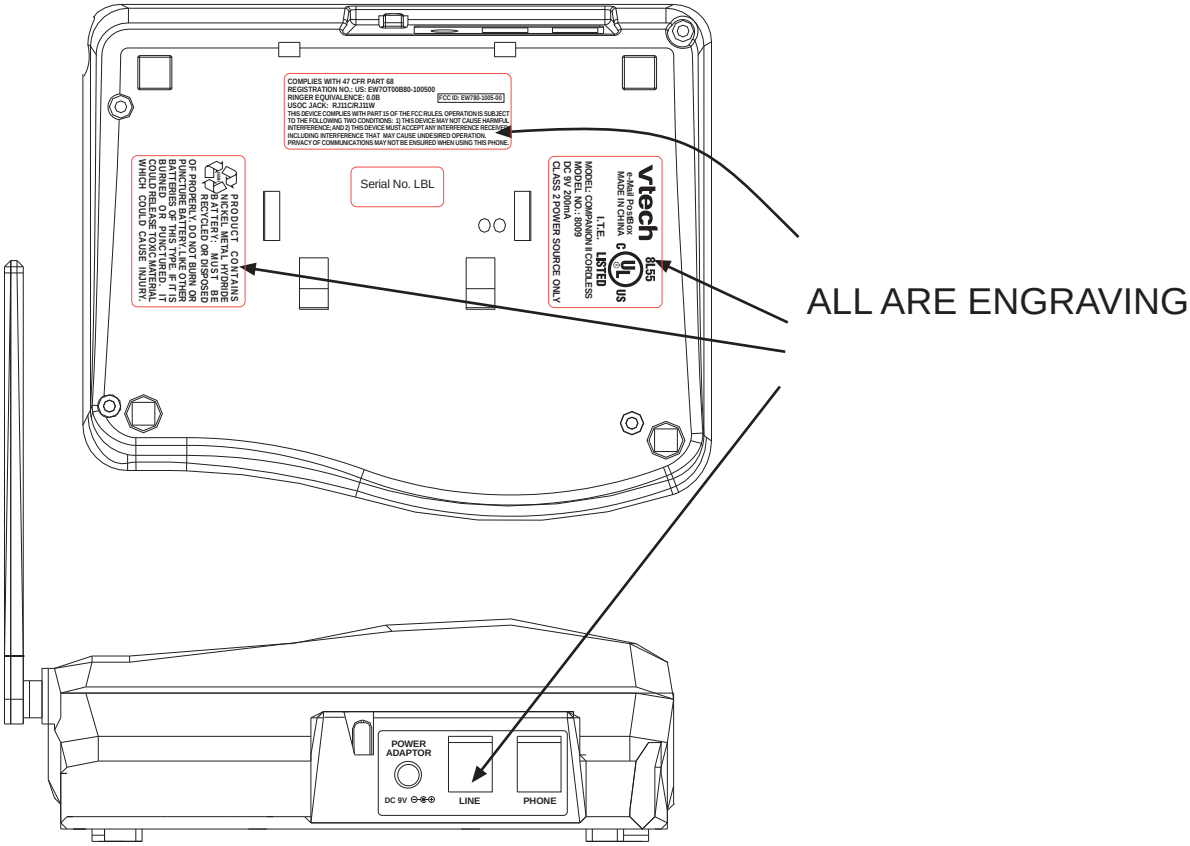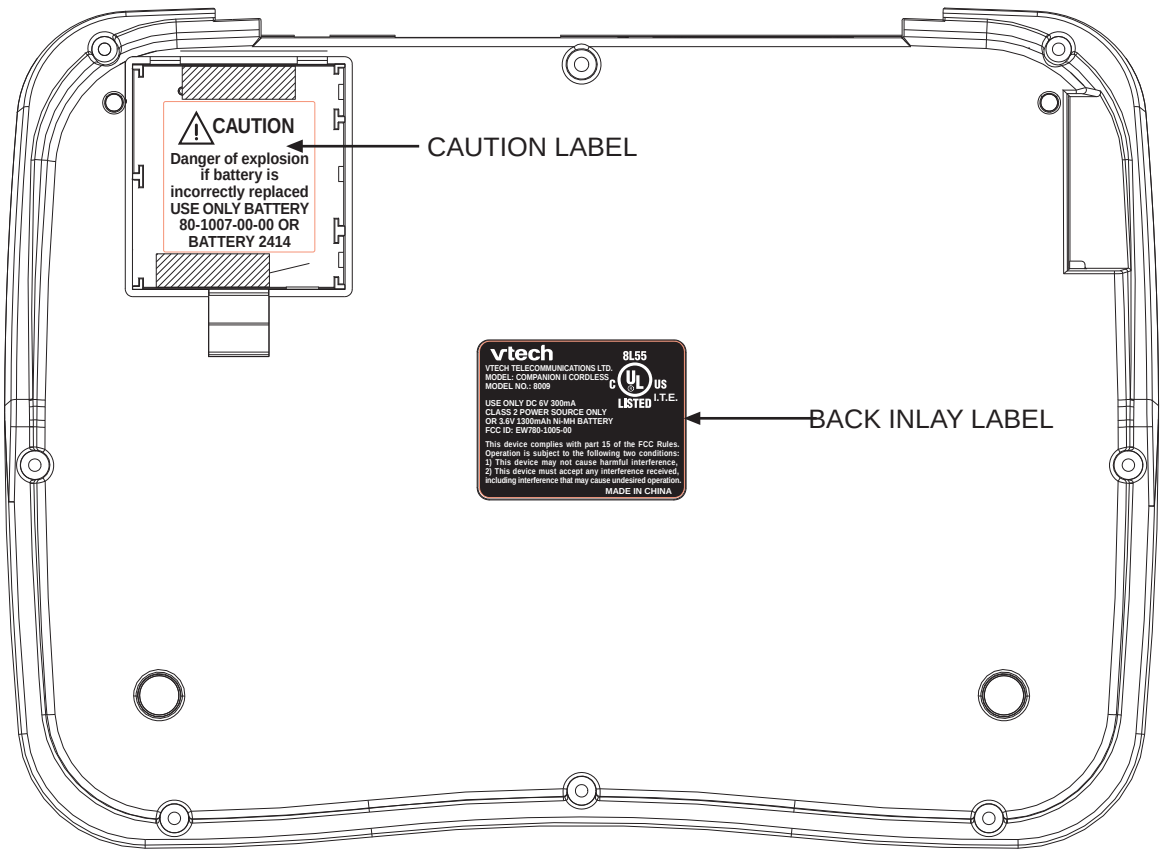C2C BS AND TERMINAL FCC DRAFTS