Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	
Establishing a 5G Fund for Rural America	GN Docket No. 20-32
Universal Service Reform – Mobility Fund	WT Docket 10-208 (closed)

COMMENTS OF THE MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Commonwealth of Massachusetts
Department of Telecommunications and Cable

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The Massachusetts Department of Telecommunications and Cable ("MDTC")[1] respectfully submits these comments in response to the Notice of Proposed Rulemaking released by the Federal Communications Commission ("FCC") on April 24, 2020.[2] The FCC seeks comment on its proposed "5G Fund for Rural America" ("Fund"), which would distribute $9 billion over ten years to support mobile voice and broadband services that use 5G technology,[3] to be awarded in two phases through multi-round reverse auctions.[4] Phase I would provide $8 billion to support the capital and operating costs of such services, while Phase II would provide $1 billion to "bring wireless connectivity to harder to serve and higher cost areas" and "facilitate

[1] The MDTC regulates telecommunications and cable services within Massachusetts and represents the Commonwealth before the FCC. MASS. GEN. LAWS ch. 25C, § 1; MASS. GEN. LAWS ch. 166A, § 16.

[2] *In re Establishing a 5G Fund for Rural America*, GN Docket No. 20-32, Notice of Proposed Rulemaking and Order (Rel. Apr. 24, 2020) ("NPRM").

[3] *See id.* ¶ 19 (the FCC proposes that such service must "meet at least the 5G-NR (New Radio) technology standards developed by the 3rd Generation Partnership Project (3GPP) with Release 15 (or any successor release that may be adopted by the Office of Economics and Analytics and the Wireline Competition Bureau after notice and comment).").

[4] *Id.* ¶ 2.

precision agriculture."[5] The MDTC believes that the FCC should conduct this proceeding with more accurate data than proposed under Option A, and can and should do so more quickly than the timeline proposed for Option B. The MDTC also offers specific comment on other issues the NPRM raises.

The NPRM proposes two options to identify and/or prioritize locations for support. Under "Option A," the FCC would designate as eligible for Phase I funding all of those census blocks deemed rural,[6] and then prioritize for funding those rural census blocks that do not currently receive 4G LTE service. Under "Option B," the FCC would designate as eligible for Phase I funding all of those census blocks that the FCC determines in its pending Digital Opportunity Data Collection proceeding[7] do not have 4G LTE service. The FCC states that it intends to use the DODC as the rulemaking proceeding required by the recently enacted Broadband DATA Act.[8] The resulting service availability reporting requirements would, presumably, meet the data reporting and related requirements of the DATA Act.

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5 *Id.* ¶¶ 2-5. The NPRM is unclear as to the criteria to be used to award funds in Phase II of the proposed program. The NPRM states that the Fund for Rural America would total "no more than" $9 billion (*id.* ¶ 2) and that "at least" $8 billion of that would be awarded in Phase I (*id.*), presumably leaving $1 billion or less for Phase II. But the NPRM then states that Phase II would both support services in "harder to serve and high cost areas" and "facilitate precision agriculture," and then states that "at least $1 billion" would be used "to facilitate precision agriculture." It is unclear how any funds would remain for Phase II to support services in harder to serve and high cost areas if the total amount of the Fund that could remain for Phase II must instead be used to facilitate precision agriculture. It would appear, therefore, that the highest cost, non-precision agriculture locations need to be given priority in Phase I, as that will be their only opportunity to receive funding.

6 "Rural," and therefore, eligible census blocks would be those not defined as "urban" by the Census Bureau from among the census tracts designated by the USDA as "Rural-Urban Commuting Area, codes 5-10." *Id.* ¶ 2.

7 *In re Establishing the Dig. Opportunity Data Collection and Modernizing the FCC Form 477 Data Program*, WC Docket No. 219-195, Report & Order & Second Notice of Proposed Rulemaking (Rel. Aug. 6, 2019) ("DODC").

8 *Id.* ¶ 37 n.64; Broadband Deployment Accuracy and Tech. Availability (Broadband DATA) Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) ("DATA Act").

At a time when mobile voice and data services are more critical than ever—for work, for education, for healthcare, and for maintaining our connections to family, friends, neighbors, and others—the MDTC applauds the FCC's prioritizing bridging the digital divide and working to extend voice and data services to all Americans. We offer the following comments in the expectation they will increase the likelihood of meeting the FCC's goals of most efficiently and accurately directing high-cost support to where it is needed.[9]

First, the MDTC opposes "Option A," because it would rely on both inaccurate 4G LTE deployment data and on rural designations, which are an unavoidably imprecise predictor of locations' likelihood of receiving unsubsidized 5G service. The MDTC encourages the FCC to issue rules as quickly as possible that require 4G LTE service providers to report data that complies with the DATA Act,[10] whether pursuant to this proceeding, the DODC, or otherwise. Such rules need not await others required by the DATA Act, which can be issued separately, and need not wait until the statutorily required deadline.[11] In addition, the FCC should immediately assemble the resources it will need to process that data once it is submitted.

Second, the NPRM proposes to include an adjustment factor for auction bids that would account for the added costs of rugged topography, but does not state whether the adjustment factor will account for differing capital and operating costs.[12] The MDTC requests that the FCC include an adjustment factor that accounts for differences in the costs of deploying and operating 5G service, as it has done for other deployment programs. Third, the MDTC encourages the

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9 *See* NPRM ¶ 2.

10 *See* DATA Act § 802(b)(5).

11 *See id.* § 802(a)(1) (September 21, 2020 is 180 days after the enactment of the Act, which occurred on March 23, 2020).

12 *See* NPRM ¶¶ 66, 67.

FCC to ensure that a challenge process is in place prior to Fund auctions to allow third parties—states, localities, private citizens, nonprofits, etc.—to submit data, including drive test results, that challenge the data submitted by providers pursuant to the proposed reporting requirements for Fund recipients. Relatedly, providers and their contractors should be required to certify that they have submitted to the FCC all of the speed tests they would be required to conduct to satisfy the Fund's proposed requirements, to ensure the accuracy of test results. Finally, the MDTC suggests that FCC require Fund recipients to report infrastructure details, such as cell locations, to allow the FCC to more accurately test providers' service claims and make such data available to states pursuant to existing confidentiality rules applied to similar FCC datasets.

I. THE FCC SHOULD NOT ADOPT THE PROPOSED "OPTION A" FOR FUND AUCTIONS.

The MDTC opposes the proposed "Option A" for three reasons. First, this approach would automatically and unnecessarily exclude support for any American who does not live in a "rural" area, as the FCC defines that term. Second, any definition of "rural" risks being either underinclusive or overinclusive or both, and being an imprecise predictor of the likelihood of a location's future receipt of unsubsidized 5G service. Third, Option A would prioritize locations based on data the FCC and others have already determined to be inaccurate.

A. THE FUND SHOULD NOT AUTOMATICALLY EXCLUDE ALL "NON-RURAL" LOCATIONS.

The MDTC opposes an approach which would replace[13] the Mobility Fund Phase II ("MF-II") proceeding which offered support for mobile voice and broadband services to qualifying locations throughout the United States with a program that would automatically render ineligible all "non-rural" neighborhoods, as the FCC or other agencies define that term. If

[13] *Id.* ¶ 16.

the FCC determines location eligibility using accurate 4G LTE location data, there is no reason to limit the program to "rural" areas. The Fund can simply direct support to areas which do not currently receive 4G LTE service, wherever they are, as was the approach proposed by the MF-II.

B. RURALITY IS TOO IMPRECISE A PREDICTOR OF LOCATIONS' LIKELIHOOD OF RECEIVING 5G SERVICE FOR THE FCC TO USE TO DETERMINE FUND ELIGIBILITY.

The MDTC believes that using rurality to predict a location's likely failure to receive 5G service without public subsidy is too imprecise a method of distributing $9 billion collected from America's telephone customers.

First, any existing definition of "rural" risks being either underinclusive or overinclusive, or both. The FCC supports its proposal to limit 5G Fund support to "rural" areas by noting that the deployment of 5G service in the United States to date "has been primarily concentrated in more urban areas with larger population bases."[14] Specifically, the FCC cites the fact that the two largest providers of these services have deployed their 5G services to 34 (Verizon) and 35 (AT&T) cities, respectively, and that T-Mobile has deployed its 5G service "nationwide."[15] But the NPRM does not explain how these providers' advertised 5G services support the FCC's implied assumption that 5G service will be deployed to all "non-rural" locations absent USF support, and, therefore, that such locations should be excluded from Fund support. Verizon and AT&T's 5G advertising does not specify which census blocks in these cities or their metropolitan areas actually receive such services and says nothing at all about census blocks that are neither in one of these cities nor in a "rural" area, including all of the nation's other

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14 *Id.* ¶ 17.

15 *Id.*, n.34.

"Urbanized Areas" or "Urban Clusters."[16] As a result, relying on AT&T and Verizon's 5G deployments as proof that only rural locations will not receive 5G service without public support risks being underinclusive. Similarly, T-Mobile has made no commitments to deploy 5G service to any specific census block as part of its merger with Sprint, nor has the FCC required T-Mobile to provide the FCC with specific census block deployments prior to the proposed Fund auctions.[17] On the other hand, the fact that T-Mobile advertises that it has already deployed 5G service "nationwide" suggests that reliance on a location's rurality to indicate its likelihood of receiving unsubsidized 5G service may also risk being overinclusive.

As for future 5G deployment, providers' deployment decisions for telecommunications services are based on a variety of factors that determine their projected returns on investment ("ROI"), including both cost factors, such as topography, and revenue factors, such as predicted demand based on residents' income levels.[18] As a result, providers do not extend services to all "non-rural" locations, a fact noted by commenters.[19] Providers' lists of locations which lack 4G

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16 *See id.* ¶ 17 (excluding U.S. Census Bureau-defined "Urban Areas" and "Urban Clusters" from the FCC's proposed definition of "rural").

17 *See generally In re Applications of T-Mobile US, Inc., & Sprint Corp. For Consent to Transfer Control of Licenses & Authorizations*, Memorandum Opinion & Order, Declaratory Ruling, & Order of Proposed Modification, 34 FCC Rcd. 10,578.

18 *See, e.g.*, Sean Buckley, "AT&T denies claims it is redlining Ohio broadband customers," FIERCETELECOM, Aug. 25, 2017, https://www.fiercetelecom.com/telecom/at-t-denies-claims-it-redlining-ohio-broadband-customers (AT&T denies that it engages in broadband redlining and says that it "bases its network investment decisions on where it sees the potential to get a good return on those investments."); VAMSI GADIRAJU, ET AL., WHO GETS BROADBAND WHEN? A PANEL DATA ANALYSIS OF DEMOGRAPHIC, ECONOMIC, AND TECHNOLOGICAL FACTORS EXPLAINING U.S. BROADBAND DEPLOYMENT (2018) (finding a positive correlation between broadband availability and new deployment and income (*i.e.*, poorer areas have less broadband and less often receive new deployments)), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3142479; AUSTIN COLEMAN, THE EFFECT OF PER CAPITA INCOME ON BROADBAND ACCESS (finding that every $10,000 of per-capita income is associated with a change in broadband access rates of approximately 9%), https://uknowledge.uky.edu/mpampp_etds/245.

19 *See, e.g.*, Letter from Russell P. Branzell, President and CEO, and John Kravitz, President, Board of Trustees, College of Healthcare Information Management Executives, to Marlene Dortch, Sec'y, FCC (June 1, 2020) p. 4 ("Beyond just the rural setting, access to 5G network bandwidth will fundamentally alter how a provider organization operates. As the FCC considers the expansion or continued

LTE voice and/or broadband service in the Form 477 and MF-II proceedings simply do not mirror the list of "rural" census blocks found in any of the definitions of "rural" cited by the NPRM.[20] While a reliance on the existence of 4G LTE deployments as an indicator of likely future 5G deployment is logical for the reasons the FCC details,[21] a reliance on a "rural" categorization to somehow correct the inaccuracies in the available 4G LTE location data is unsupported, and the MDTC opposes such reliance.

In addition, as the NPRM's discussion of possible definitions of "rural" makes clear, federal agencies use many definitions of "rural," all of which exclude or include neighborhoods based on criteria which may differ from those that 5G providers may use in the future to determine where to offer 5G service.[22] Choosing another federal agency's definition of "rural," as the NPRM proposes, would necessarily incorporate the decisions that agency made while formulating its definition to include some locations and exclude others. Such decisions would have been unrelated to the FCC's goal of including in its definition of "rural" only those locations that are unlikely to receive 5G service without public subsidy. Given the widely differing land use patterns across the United States and its territories, these distinctions between "rural" and "non-rural" are necessarily difficult and imprecise.

Further, even if there were a precise definition of "rural," these "rural" areas would not indicate which locations would receive unsubsidized 5G service over some future period. The NPRM implicitly acknowledges that many "rural" areas will in fact receive 5G service without

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implementation of this program, we encourage them to consider how best to extend available funding to both providers and patients in areas considered urban, but underserved, a portion of the country consistently unable to access funding opportunities put forward by the FCC.").

20 *See* NPRM ¶¶ 26-31.

21 *See id.* ¶ 32.

22 *Id.* ¶¶ 25-31.

public subsidy by proposing to exclude from the Phase I auction those locations that T-Mobile will be serving, which will include 90% of "rural Americans."[23] Indeed, some portions of some of the communities that the FCC Staff Report identified as meeting its definition of "rural" and, therefore, qualifying for Fund support, may receive 5G service without such support. Portions of census blocks with dense urban town centers and/or those with relatively high incomes or with high concentrations of summer homes and vacation lodgings may meet providers' ROI requirements for deployment. These communities exemplify the imprecision both of distinguishing "rural" from "non-rural" and of using rurality as an indicator of the likelihood of receiving unsubsidized 5G service in the future.

C. THE FCC SHOULD NOT DISTRIBUTE USF SUPPORT BASED ON DATA IT HAS ALREADY FOUND TO BE INACCURATE.

The MDTC opposes the FCC's use of data that the FCC has already determined to be flawed to identify locations which would receive funding priority. Both the FCC[24] and a wide range of observers have tested the FCC's Form 477 data and found it be incorrect.[25] Similarly, the FCC's own Rural Broadband Auctions Task Force found similar data that providers

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23 *See* NPRM ¶ 23.

24 *Id.* ¶ 34.

25 *See, e.g.*, Arthur Scott, "Understanding the True State of Connectivity in America," March 1, 2020, https://www.naco.org/resources/featured/understanding-true-state-connectivity-america (National Association of Counties developed a speed test app, "TestIT," which showed that mean mobile and fixed wireless internet speeds fell below the FCC's speed standard for broadband service in most American counties, despite providers' contrary claims on Form 477); Vt. Dep't of Pub. Serv., *Mobile Wireless in Vermont* 1 (Jan. 15, 2019), https://publicservice.vermont.gov/content/mobile-wireless-drive-test-report-january-2019 (Vermont's drive testing of that state's 4G LTE coverage showed that, even having measured only along major roads, at least 15% of Vermont's territory lacked qualifying 4G LTE service, as opposed to the 5% providers reported on Form 477); The Center for Rural Pennsylvania, "Broadband Availability and Access in Rural Pennsylvania," June 2019, https://www.rural.palegislature.us/broadband/Broadband_Availability_and_Access_in_Rural_Pennsylvania_2019_Report.pdf (Working with M-Lab, the Center collected 11 million consumer speed tests and determined that median broadband download speeds were less than those claimed in FCC Form 477 data in every county in PA).

submitted at the FCC's request in the MF-II proceeding to be incorrect.[26] In fact, the Rural Task Force found this provider-submitted data to be correct only 62% of the time.[27] It would be inappropriate to use this same data to distribute $9 billion in consumer-derived funds.

D. THE FCC SHOULD USE ACCURATE 4G LTE SERVICE AVAILABILITY DATA WHICH COMPLIES WITH THE DATA ACT TO DISTRIBUTE FUND SUPPORT.

The FCC proposes to use the pending DODC proceeding as the rulemaking required to issue rules required by the DATA Act, which requires that such rules be issued no later than September 29, 2020.[28] Given the urgency of meeting the mobile voice and data needs of communities lacking such services now that the FCC has ended the long-suspended MF-II proceeding,[29] the MDTC urges the FCC to quickly issue rules requiring providers to report 4G LTE service availability, rather than waiting to issue all the rules the DATA Act requires at once. Further, the MDTC urges the FCC to include in such rules a relatively short deadline for such filings. Since the DODC proceeding has now been open for more than 10 months, mobile voice and data providers are aware of the likely reporting parameters, and, of course, are in the best position to know the locations to which they provide service, regardless of reporting format. In addition, the MDTC urges the FCC to immediately begin preparing the necessary resources, internal or otherwise, to process the resulting data from providers. A timeline between order and auction similar to that in the Rural Digital Opportunity Fund ("RDOF") proceeding could allow

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26 NPRM ¶ 24.

27 *Id.*

28 *See id.* ¶ 37 n.64; DATA Act § 802(a)(1) (requiring the FCC to establish rules by September 21, 2020).

29 NPRM ¶ 201.

for a Phase I auction with accurate data in 2021, a monumental step toward achieving the FCC's goal of bridging the digital divide.[30]

II. THE FCC SHOULD INCLUDE IN THE BIDDING ADJUSTMENT FACTOR THE SAME FACTORS IT HAS USED FOR OTHER USF DEPLOYMENT PROGRAMS.

The NPRM proposes to include an adjustment factor for auction bids that would account for the added costs of deploying 5G service to and operating such service in locations with, for example, "differing terrain characteristics as well as the potential business case for each area," as a way of encouraging bids for these locations.[31] The MDTC supports this proposal and additionally suggests that the FCC account for all relevant differences in 5G deployment and operating costs between locations, not just differences in terrain, for the same reason: to ensure that even locations where deployment is more expensive will have a chance to receive service. Such differences include differences in the cost of labor and transportation to both deploy and operate 5G service, as well as differences in the cost of utility and other operating costs. Because this is to be a nationwide auction, failure to include in the adjustment factor differences in locations' deployment costs would disadvantage those locations with relatively higher build-out costs. Such failure would depart from the FCC's past practices which have attempted to account for differences in relevant capital and/or operating expenses between locations in an auction's bidding structure, including the removal of low cost locations based on FCC-calculated model costs, or the setting of reserve prices for each location.[32] To ensure that more costly

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30 The FCC scheduled the RDOF auction to occur a little more than 8 months after the publication of the Order in that proceeding in the Federal Register. *See* FCC Public Notice, "Comment Sought on Competitive Bidding Procedures and Certain Program Requirement for the Rural Digital Opportunity Fund Auction (Auction 904)," AU Docket 20-34 (Mar. 2, 2020) ¶ 1.

31 NPRM ¶ 66.

32 *See, e.g.*, *In re Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd. 2152, ¶ 19 (2017) ("MF-II Report and Order") (which would have used a model that estimates

locations have an opportunity for funding, the FCC should fully describe the costs which it will incorporate into the adjustment factor and should include all relevant location-based differences in 5G deployment and operating costs.

III. THE FCC SHOULD ESTABLISH A PROCESS BY WHICH THIRD PARTIES CAN CHALLENGE COVERAGE DATA PROVIDED BY FUND RECIPIENTS, AND PROVIDERS AND THEIR CONTRACTORS SHOULD BE REQUIRED TO CERTIFY THAT THEY HAVE SUBMITTED ALL SPEED TESTS THEY WOULD CONDUCT TO SATISFY FUND REQUIREMENTS.

To build on the importance of the accuracy of the data discussed above, the FCC should adopt a robust challenge process to ensure the accuracy of the post-auction 5G service availability reporting it proposes to require of Fund recipients. [33] As the FCC has recognized, "no data source . . . will be perfectly accurate."[34] The FCC's 4G LTE reporting rules will be issued pursuant to the DATA Act and, therefore, include the DATA Act's challenge requirements.[35] But the 5G service availability reporting requirements for Fund recipients should also be subject to the same accuracy-improving procedures. As in the MF-II proceeding, the FCC should accept alternative data from states and other sources.[36] Relatedly, providers and any contractors they hire to conduct the proposed drive tests[37] should be required to certify that they have submitted

costs and revenues, to determine amounts of support to be made available in particular geographic areas.); *In re Rural Digital Opportunity* Fund, WC Docket 19-126, Report & Order, FCC-20-5, ¶ 15 (2020) (adopting reserve prices, bids below which the FCC bids will not accept, which are based on costs and revenues calculations from the Connect America Fund proceeding, *In re Connect America Fund*, WC Docket No. 10-90, Report & Order, DA 14-534 (2014)).

33 *See* NPRM ¶¶ 106-121.

34 MF-II Report and Order ¶ 58.

35 *See* DATA Act § 802(b)(2)(B).

36 MF-II Report and Order ¶ 61.

37 NPRM ¶ 113.

to the FCC all of the speed tests they would conduct in order to satisfy the Fund's requirements, to ensure the accuracy of drive test results.

IV. THE FCC SHOULD REQUIRE THE SUBMISSION OF INFRASTRUCTURE DETAILS, SUCH AS CELL LOCATIONS, TO HELP THE FCC VERIFY COMPLIANCE WITH THE PROGRAM'S REQUIREMENTS AND SHOULD PROVIDE STATES ACCESS TO SUCH DATA SO THAT STATE COMMISSIONS MAY HELP VERIFY SUCH COMPLIANCE.

The NPRM asks whether the FCC should require that Fund recipients report characteristics and locations of the infrastructure they deploy to provide 5G service. The FCC seeks this information in order to allow the FCC to evaluate recipients' performance claims and their compliance with the Fund's service performance requirements.[38] For the reasons the FCC discusses, the FCC should require the collection of such infrastructure data. Doing so will help the FCC test recipients' performance claims. Although the FCC is required by the DATA Act to issue rules allowing for the confidentiality of information submitted by providers, these providers should be held accountable when they use consumer dollars to build their infrastructure. State commissions are well positioned to test local deployment and service claims and, as such, act as stewards of these consumer dollars. In addition, because the NPRM would require Fund recipients to obtain eligible telecommunications carrier (ETC) designations prior to receiving funds[39] and because many states retain their authority to grant such designations, access to this deployment data will also help these states fulfill their role as stewards of the

[38] *Id.* ¶ 115.

[39] *Id.* ¶ 122.

USF.[40] Such access can be made pursuant to the same confidentiality restrictions with which states access other confidential FCC data.[41]

V. CONCLUSION

The FCC should not adopt its proposed "Option A" for determining locations' eligibility for the Fund's Phase I auction and should instead base eligibility for the Fund on accurate data. To do so, the FCC should expeditiously issue rules requiring 4G LTE service availability reporting and put in place the resources to process the resulting data. Second, the FCC's proposed adjustment factor for auction bids should include the factors that account for differences in regional costs of deployment and operation, as the FCC has used for other USF deployment programs. Third, the FCC should establish a challenge process by which any third party—states, localities, private citizens, nonprofits, etc.—can submit data that challenges 5G data provided by Fund recipients. The FCC should also require providers and any contractors they hire to conduct the speed tests the FCC proposes to certify that they have submitted all of the speed tests they would conduct to satisfy the Fund's requirements, to ensure the accuracy of the test data. Finally, the FCC should require the submission of infrastructure details, such as cell locations, in order to allow the FCC to verify such submissions and make such data available to state commissions pursuant to the same rules which apply to state access to other confidential FCC data. Consumers are paying for this equipment and its deployment and therefore have the

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40 *See* 47 U.S.C. § 214(e)(2).

41 *See* 47 C.F.R. §§ 1.7001(d), 52.15(f)(7); *In re Local Competition & Broadband Reporting*, CC Docket No. 99-301, *Report & Order*, 15 FCC Rcd. 7717, ¶ 95, at 7761-7762 (2000); *In re Local Tel. Competition & Broadband Reporting*, WC Docket No. 04-141, *Report & Order*, 19 FCC Rcd. 22,340, ¶ 26, at 22,353 (2004) (retaining the policies and procedures with regard to the data-sharing with states); *In re Numbering Resource Optimization*, CC Docket No. 99-2000, *Third Report & Order & Second Order on Reconsideration*, 17 FCC Rcd. 252, ¶ 133, at 309 (2001); *In re Numbering Resource Optimization*, CC Docket No. 99-200, *Report & Order & Further Notice of Proposed Rulemaking*, 15 FCC Rcd. 7574, ¶ 75, at 7606 (2000).

right to know what they have paid for. State public consumer advocates can verify Fund recipients' deployment and service claims on the public's behalf while maintaining the confidentiality of that data.

Respectfully submitted,

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