



Annual Report 2016

DELAWARE COMPENSATION RATING BUREAU, INC.

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ANNUAL REPORT 2016

Submitted to the Membership of the Delaware Compensation Rating Bureau, Inc. by William V. Taylor, President

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PRESIDENT'S MESSAGE

As we conclude 2016, we enter a year where we celebrate the 100 Year Anniversary of Workers' Compensation in Delaware. The Delaware Compensation Rating Bureau (DCRB) has been honored and privileged to have serviced this marketplace for all of these 100 years. DCRB appreciates the employers and employees in the state of Delaware. We are most grateful for the support and backing provided to us by the Delaware Department of Insurance.

We leave 2016 with Delaware's workers compensation marketplace gradually showing signs of cost improvements compared to recent years. This improvement stems from the emerging savings from the recent legislative implementations of medical fee schedule changes. The market is becoming healthier regarding the costs inherent in the system. The DCRB is proud to be a participant in this system during this period of change and remains committed to serving this marketplace for many years to come.

Looking back and moving forward...we observe an improving workers compensation environment that we remain hopeful will lead to reduced costs for employers, stable benefits, and a healthy market for the insurance sector.

Over recent years, premiums have been stabilizing in Delaware and profitability levels that were volatile have recently reached a healthy level in this market. As reported in various communications, the ongoing downward claims frequency trend is helping to offset more steadily increasing indemnity and medical severity trend, resulting in gradually rising overall claim cost trends. Medical cost savings measures implemented in recent years are beginning to have an impact in the system. Thus, the most recent DCRB filing resulted in an agreement, and amendment, for an overall neutral loss cost change effective December 1, 2016.

Per the provision in HB175, the Insurance Commissioner appointed a Ratepayer Advocate for review of DCRB's annual voluntary market loss cost and residual market rate indication filing, DCRB Filing No. 1603. On August 2, 2016 the DCRB filed an indication for an overall Delaware voluntary market loss cost increase of 3.18 percent and an overall residual market rate increase of 1.18 percent. This filing was reviewed by two actuarial firms retained by the Department of Insurance and by another actuarial firm retained by the Ratepayer Advocate. Three public information meetings were scheduled and held in September of 2016. Due to the modest changes proposed, the meetings were not as well attended as in prior years. Review by the Department's actuarial firms and by the Ratepayer Advocate's actuary commenced in September, and led to negotiations resulting in an agreement to accept a 0 (zero) percent overall change in voluntary market loss costs and in residual market rates for the December 1, 2016 effective date. An amended filing was prepared and submitted on October 12, 2016 and was approved and announced to members by DCRB Circular 924 on October 14, 2016.

DCRB continues to supply various data reports required by HB175 and HB373. HB175 had required quarterly reports of data to the Data Collection Committee (DCC). The resulting reports provide summaries of data based on the Medical Data Call collected by the DCRB consistent with a national protocol undertaken by the workers compensation insurance industry. This series of reports continued to be required under HB373 but under the latter legislation the data was to be provided to the Workers Compensation Oversight Panel (WCOP) created by HB373. Quarterly reports were submitted to the Delaware Department of Insurance for conveyance to the WCOP on January 15; April 15; July 15; and October 14, of 2016.

HB175 and HB373 require an annual report each August pertaining to medical cost data for insurers writing larger market shares in Delaware. The DCRB complied with this provision during 2016 with a submission to the Delaware Department of Labor in July containing 33 pages of compilations of unit statistical data, one for each of the thirty two largest carrier groups based on 2015 premium writings in Delaware and one carrier summary.

The DCRB continues to review and analyze changes made to the Delaware health care payment system, and the impact on medical losses for workers' compensation in Delaware, due to HB373, which has three annual effective dates: January 31, 2015, January 31, 2016, and January 31, 2017. Compliance with all forms of data reporting and related provisions of recent Delaware legislation is ongoing.

The DCRB elected to not submit an F-Classification filing for Delaware in both 2015 and 2016. This was done in order for the process to be resynchronized, where there will be an F-Classification filing submitted in 2017 for revised rating values effective December 1, 2017.

There were six filings made in 2016, in addition to the Loss Cost filing. Please refer to the DCRB website for the following notable circulars from approved filings:

- Basic Manual Revisions to Sections 1 and 2
 - Manual Housekeeping Revisions
 - Revisions to Designated Auditable Payrolls and Concurrent Manual Amendments
- Revisions to Delaware Statistical Plan Manual Housekeeping Items
 - Statistical Plan Manual Housekeeping Items and Premium Algorithm Update
- Classification Items
 - Code 941, Social Rehabilitation Facility
 - Code 986, Shelter Or Halfway House Residential Non-Medical
- Miscellaneous Items
 - DE Medical Data Call adoption of several new codes
 - Establishment of an Audit Noncompliance Charge
 - Revisions to Delaware Workers Compensation Insurance Plan Handbook
 - Revision to the Assigned Carrier Performance Standards (ACPS)
- Anniversary Rating Date (ARD) Elimination Items
 - Three filings (Rate/Form/Rule) made and approved for this change

While still relatively new to DCRB, it is an honor to report on this past year's accomplishments and undertakings. Although a challenging year, it ends as highly rewarding with productive results for DCRB; there are many new milestones to mention.

One of the more important set of changes in 2016 was a transitioned leadership group for the organization. There were notable hiring's and executive appointments made. New in 2016 were our Vice President of Underwriting, Director of Statistical Reporting and the Director of Actuarial Research. The Senior Vice President role was also reappointed. The executive team is developing a strong tempo, showing progression with completed and planned projects on every person's slate.

Another pivotal activity for the organization was the enterprise-wide review of the internal systems which are fundamental to data collection and operation. The process included extensive review, analysis, and identification of options for upgrading the existing mainframe IT environment. Following this evaluation there were two compelling options to consider. One was the use of a vendor based solution, used by a few other independent bureaus. The other was to reengineer the system with a local developer, supported by internal staff. With Governing Board support the recommendation to reengineer the IT architecture was approved.

The work being planned for DCRB's systems will further reflect the DCRB's continued commitment to enhancing the electronic capabilities for exchanging information with key constituencies. Virtually all policies, endorsements, cancellations, reinstatements and unit statistical reports (excluding Individual Case Reports) were submitted to the DCRB electronically in 2016. Experience rating and merit rating worksheets continue to be transmitted electronically to all DCRB members. DCRB continued providing electronic access to experience modifications, merit ratings and a variety of other pricing metrics to its membership, as established in early 2012.

The DCRB's expertise in the collection of Medical Data Call information continued in 2016. This important and developing expertise and capability is intended to benefit the industry by providing increased detail pertaining to the treatment of workers' compensation injuries using a standard protocol across jurisdictions. For twenty-six quarters (transactions received for the Third Quarter 2010 through the Fourth Quarter 2016) the DCRB collected approximately 3.6 million records accounting for almost \$462 million in paid medical benefits. Ongoing initiatives related to this effort are focused on data quality and analytical processes, procedures and tools.

The DCRB continues to aspire to the highest possible levels of service to its members, those members' insureds, regulators, legislators, other governmental offices and the workers of Delaware covered under the Workers Compensation Act. Following are a few highlighted additional areas of DCRB activity during 2016:

PCRB ACTUARIAL INITIATIVES

In conjunction with the DCRB Actuarial Committee, staff identified various special projects for consideration in 2016 and beyond. A series of analyses, reports, and special projects has been identified, further defined, and prioritized for purposes of tracking and oversight. These projects fall in five general categories: legislative analysis, aggregate ratemaking methodologies, individual risk rating, class ratemaking, and market analysis. Perhaps the most significant project is the evaluation and improvement of the experience rating plan

DCRB INFORMATIONAL INITIATIVES

The DCRB continued to provide the insurance industry with educational programs in 2016. Subjects addressed in these seminars range from basic programs describing DCRB operations and functions to more advanced and detailed classes covering specific topics such as the Test Audit Program, unit statistical reporting, and workers compensation rating plans.

BUDGET AND ASSESSMENT EXPERIENCE

Expenditures for the Year 2016 were slightly reduced versus 2015 due to the shorter cycle observed for the loss cost filing and lessened legal expenses associated with the issues and costs of the Ratepayer Advocate and associated actuarial services. Otherwise, overall expenses were in line with DCRB's budget plan.

During 2014, an Ad Hoc Committee of members of the PCRB and DCRB Governing Boards reviewed past expense and assessment experience and considered staff advice with regard to a practical allocation of resources between the two organizations. An approach which derives the DCRB's share of PCRB expenses directly and without reference to comparative premium volumes was proposed and adopted for 2016 by both the PCRB and DCRB Governing Boards.

DATA COLLECTION ACTIVITIES

Collection of timely, accurate and complete statistical information remains a key issue for the DCRB and its members. In 2016, existing programs and incentives applicable to the reporting and collection of financial and unit statistical data, as well as the monitoring of carrier audits, continued to be actively monitored and managed by DCRB staff. An overview of 2016 data collection program experience follows:

<u>Financial Data</u> – Although members were generally able to use the Financial Data Reporting Application (FDRA) during the reporting season for 2015 Calls in 2016, incentive charges of approximately \$18,000 associated with those reports were assessed in early 2017. During 2016, the DCRB continued to use and improve upon its FDRA to collect the 2015 Calls that were subject to the FDIP).

The FDRA used in 2016 included all Financial Calls for 2015 reports. This internet-based application allows reporting entities to view results of applying DCRB edits prior to submission of entered data and will expedite the exchange of criticisms and corrected data, if needed. The FDRA helps to accelerate availability of financial data and to mitigate incentive charges previously encountered by carriers experiencing difficulty in successfully passing edits applicable to the DCRB's Financial Call.

<u>Unit Statistical Plan Fines</u> – Most members successfully complied with reporting requirements for the Unit Statistical Plan. Incentive charges incurred in 2016 were approximately \$63,000. Comparable 2015 charges were approximately \$134,000.

A portion of the Unit Statistical Plan incentive charges incurred in 2016 was again attributable to a small number of carriers in various stages of supervision, rehabilitation and/or liquidation by various insurance departments. As a consequence, approximately \$31,000 of the Unit Statistical Plan incentive charges incurred for the year proved uncollectible.

<u>Test Audit Program</u> – The four-quarter difference ratio adjusted for carriers opting out of the program was 16 percent for 2016, 15.2 percent for 2015 and 16.2 percent for 2014. This reflects a relatively steady average on these difference ratios and are substantially below (better than) the prevailing program standard of 20 percent.

WORKERS COMPENSATION RESEARCH INSTITUTE (WCRI) BENCHMARKING STUDIES

The DCRB has initiated a proposal to establish a Delaware component into the series of multistate benchmarking studies (CompScope[™] Medical Benchmarks) conducted by the Workers Compensation Research Institute.

LEGISLATIVE INITIATIVES

There was no appreciable Delaware legislation impacting the workers' compensation system in 2016. A Bill regarding workers compensation exclusive remedy, House Bill 308, was passed in June, 2016. This Bill provided a provision that would allow workers injured on the job in motor vehicle accidents to also recover uninsured and underinsured motorist benefits, and personal injury protection benefits.

DCRB stands ready to provide objective and credible input to public policy debates involving the workers' compensation system. The DCRB did focus on work regarding two nationally focused initiatives having significant bearing on workers' compensation. These NCCI filings were: 1) Audit Non-Compliance Charge and 2) Elimination of Anniversary Rating Date. These filings were made and approved in early 2016.

Going forward you will see additional changes and improvements in the way we communicate to you. We will be utilizing more graphics and metrics in order to illustrate and leverage upon the expanding array of data collected for our market. Examples are emerging such as, along with this report, our simultaneous release of a 'Workers Compensation State Activity Report for Delaware' flip-book. This new report will provided deeper analysis and visual representation of activities occurring in the market. We will be imbedding more graphics into our standard communications pieces, such as our circulars. We are also making plans to refresh our website with a more current visual look and feel. We are excited about these changes as we look to enhance how we look to you.

As you read this and the State Activity Report, the dedication and importance of independent rating organizations and the National Council on Compensation Insurance in support of the workers' compensation system in the United States is clear. Like other independent rating organizations, the DCRB has a strong reliance on the resources, cooperation and communication provided to us by our members. Additionally, our Governing Board and various committees advises and directs the organization allowing us to provide the best possible level of service and support for a competitive marketplace. Collaborative with our sister independent rating organizations from across the country helps us to understand topical issues for the industry, and to develop or adopt effective systems, procedures and guidelines for the benefit of our many and varied constituencies.

This report comes with gratitude and deep appreciation to all of our constituencies. It is also with honor and privilege to be associated with the complement of diligent, experienced staff consistently striving to deliver quality services efficiently and effectively to you all.

William V. Taylor President

COMMITTEE ACTIVITIES

The various committees of the DCRB met four times in the course of 2016, participated in three teleconferences and responded to one e-mail vote/advisory.

GOVERNING BOARD

The Governing Board has general charge and management of the affairs of the DCRB. The Governing Board had one meeting and participated in two teleconferences during 2016.

Members	<u>Term Expiring</u>
American Home Assurance Company	2017
Donegal Mutual Insurance Company (Chair)	2017
Liberty Mutual Insurance Company	2018
Nationwide Insurance Company	2019
Travelers Property & Casualty Company	2019
Zenith Insurance Company (Vice Chair)	2018

CLASSIFICATION & RATING COMMITTEE

The Classification & Rating Committee is responsible for review and evaluation of the efficacy and equity of the underwriting, classification and rating procedures, as well as the administration of these rules in its role as the technical committee designed to hear the appeals of parties aggrieved by decisions of the DCRB staff. The Classification & Rating Committee reviews the recommendations of DCRB staff relative to loss cost filings, classification and underwriting rules. The Committee met once and responded to one e-mail advisory during 2016.

Members	Term Expiring
Accident Fund Insurance Company of America	2017
American Home Assurance Company	2018
Home Builders Association of Delaware	2019
Insurance Company Of North America	2017
Liberty Mutual Insurance Company	2019
PMA Insurance Company	2018
XL Insurance Company	2019

Note: One (1) public member vacancy remains as a result of an unfilled position from 2013.

ACTUARIAL COMMITTEE

The Actuarial Committee is responsible for reviewing all matters which might affect recommended rate and/or loss cost levels and plays an integral part in recommending data and analytical techniques incorporated into DCRB rating value filings. The Committee met twice during 2016.

<u>Members</u>	Term Expiring
American Home Assurance Company Donegal Mutual Insurance Company Liberty Mutual Insurance Company Nationwide Insurance Company PMA Insurance Company	2018 2019 2018 2019 2017
Travelers Property & Casualty Company	2017

NOMINATING COMMITTEE

Prior to each Annual Meeting of the DCRB the Nominating Committee proposes a slate of candidates selected from the nominations made by all DCRB members and other eligible organizations for the vacancies on the Governing Board and its Committees after the Nominating Committee has reviewed a compilation of all nomination ballots received. The Nominating Committee participated in one teleconference in 2016.

Members	Term Expiring
American Home Assurance Company	2018
Liberty Mutual Insurance Company	2019
PMA Insurance Company	2017

OPERATIONAL REPORTS

CLASSIFICATION

The classification function monitors and authorizes classifications for employers to make certain that the rating value(s) applied reflects the exposure(s) present in each business enterprise. The unit is also responsible for maintaining a continuous effort to update the classification system, responding to requests for analysis of classifications from employers, trade associations and the industry and reviewing individual case reports for proper classification assignments to verify that losses are being included in the correct classification. In 2016 the Classification Department responded to 368 outside inquiries.

FIELD SURVEY PROGRAM

In order to assure that operations of employers are properly classified the DCRB devotes a significant portion of its resources to on-site surveys of employer facilities. A DCRB field representative will visit the employer's place of business, interview the employer or another appropriate representative and observe the operations being conducted. A written report is prepared for review by a DCRB classification analyst, after which the insurer will be notified of the DCRB classification assignment and, if required, directed to correct erroneous assignments. During 2016 the DCRB issued 94 surveys.

POLICY EXAMINATION (POLICY REPORTING)

An important activity of policy reporting is the capture of policy coverage data. As the records repository for proof of insurance, this area maintains records of all insured Delaware employers through an alphabetical index system. This function provides information for claims adjudication and enforcement of statutory coverage requirements to the Delaware Department of Labor.

Each year the policy reporting area typically processes roughly 100,000 documents consisting of policies, endorsements, and cancellation and reinstatement notices. As part of the review process, carrier representatives send inquiries to DCRB members when probable errors in the reported information are detected. During 2016, policy reporting examined 135,657 documents for proper application of experience modification, merit rating adjustments, carrier rating values, employer classifications, anniversary rating dates, duplicate coverage and proper use of approved forms. The policy reporting area continues its commitment to the accurate and timely collection of data.

EXPERIENCE RATING (RATING RULES)

Experience rating is an important element of the workers compensation pricing mechanism and adjusts the manual premium for eligible employers to reflect their previous loss experience. The basic objectives of experience rating are to distribute the cost of workers compensation equitably among the employers assigned to an industry classification and to provide a direct financial incentive for employers to reduce work-related accidents and control the costs of accidents that do occur.

The rating rules area's responsibilities include timely issuance of experience rating modifications and merit rating adjustments and implementation and explanation of experience rating rules, including investigating and administering changes in ownership, entity status, and determining which entities may contribute data to a risk's rating. Staff within this unit has full knowledge of the Delaware Experience Rating Plan. The rating rules area continues to maintain a qualified staff of individuals providing professional assistance pertaining to experience rating rules and procedures.

Timely issuance of experience ratings remains a DCRB objective. Overall departmental production in all areas increases yearly.

MERIT RATING PROGRAM

The Delaware Merit Rating Program was implemented on July 1, 1999. This plan grants premium discounts or assesses premium surcharges to most employers who do not qualify under the uniform Experience Rating Plan, based on the number of lost-time claims they have incurred.

DELAWARE CONSTRUCTION CLASSIFICATION PREMIUM ADJUSTMENT PROGRAM

The Delaware Construction Classification Premium Adjustment Program (DCCPAP) was implemented on July 1, 1990. During 2016, the DCRB mailed approximately 916 applications to employers. Of that number, 345 applications were returned to the DCRB for processing and approval. The majority of the credits applied for 2016 fall within the 11 to 20 percent range.

DELAWARE WORKPLACE SAFETY PROGRAM

The Workplace Safety Program was implemented on February 1, 1989. This program offers five to 19 percent credits to eligible employers that pass a workplace safety inspection(s). The Department of Insurance authorized 1,305 employers to receive such credit in 2016.

DELAWARE INSURANCE PLAN (DIP)

The DIP is an assigned risk program providing those employers unable to secure coverage in the voluntary market with a means of insuring their operations through a designated carrier, as required under the state workers compensation act. The DCRB received and processed 637 employer applications in 2016.

The Delaware Insurance Plan Depopulation Listing helps to facilitate the potential placement of employers currently insured through the Delaware Insurance Plan in the voluntary market.

During 2016, 52 employers previously insured through the DIP secured voluntary market insurance coverage.

UNIT STATISTICAL REPORTING

The unit statistical reporting system is the central mechanism used to collect policy experience for use in ratemaking and calculation of experience modifications for individual employers. The DCRB utilizes the most sophisticated data processing techniques along with a complement of statistical technicians to review the data for accuracy and completeness.

The DCRB has a system control over the submission of required unit statistical reports under an automated data quality system. This includes monitoring unit data for accuracy, advising carriers of units and individual case reports not received and issuing criticism letters when warranted. The quality control section continues to monitor all serious claims. Questionable injury codes and indemnity and medical amounts reported on individual case reports are analyzed. Also, classification codes are compared to occupations to check the accuracy of classification assignments.

Data quality review programs are continually being updated and expanded to make the processing of unit statistical report information more efficient. These programs have consistently produced an accurate and sophisticated individual risk data base, allowing the DCRB to adopt significant and unique improvements in data collection and analytical techniques for ratemaking.

The DCRB now requires the submission of statistical reports via electronic transmission; however, paper copy reports continue to be processed. During 2016, the DCRB processed 28,531 unit statistical reports.

DCRB MEMBERSHIP

As of December 31, 2016 there were 339 members in the DCRB. During the year, six carriers joined and eight withdrew. The new members are as follows:

Allmerica Financial Alliance Insurance Company OBI America Insurance Company Explorer Insurance Company Sagamore Insurance Company Old Dominion Insurance Company Main Street America Assurance Company

The companies that withdrew:

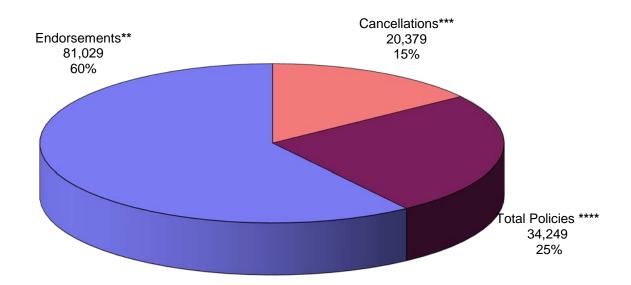
Lumberman's Underwriting Alliance Lincoln General Insurance Comp Options Insurance Company American Safety Casualty Ins. Company Fairmont Ins. Company Fairmont Premier Ins. Company Fairmont Specialty Ins. Company TIG Ins. Company

DELAWARE TOTAL POLICIES, ENDORSEMENTS AND CANCELLATIONS/REINSTATEMENTS PROCESSED **JANUARY 1, 2016 TO DECEMBER 31, 2016**

	(One-Year		Thre	ee-Year
Month of Process (1)	Policies* (2)	Endorse- ments** (3)	Cancella- tions*** (4)	Fixed Rate (5)	Annual Anniversary (6)
Total	34,245	81,029	20,379	0	4
January	3,022	7,282	2,075	0	1
February	2,418	14,573	1,623	0	0
March	2,887	8,764	1,887	0	1
April	2,871	9,044	1,698	0	0
May	2,955	4,873	1,625	0	0
June	2,879	5,231	2,016	0	1
July	2,909	5,256	1,654	0	0
August	3,070	5,508	1,645	0	1
September	2,836	4,920	1,557	0	0
October	2,967	5,141	1,573	0	0
November	2,635	4,982	1,445	0	0
December	2,796	5,455	1,581	0	0

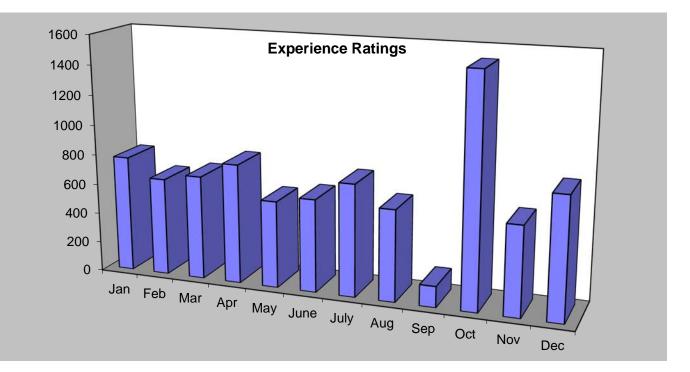
* Policy documents received, including not taken, duplicate coverage, replacements, etc. Separately filed endorsements

- **
- *** Includes reinstatements
- **** Total of one year and fixed rate/annual 3 year policies



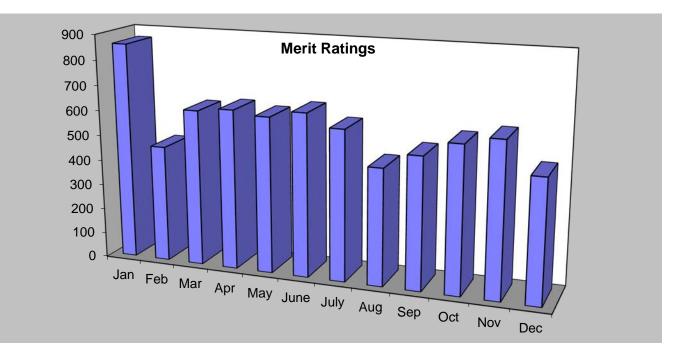
Month of <u>Issuance</u>	Total <u>Ratings</u>	Percentage			
January	776	9.12			
February	651	7.64			
March	693	8.13			
April	797	9.36			
May	578	6.78			
June	618	7.25			
July	745	8.74			
August	607	7.12			
September	140	1.64			
October	1,515	17.78			
November	593	6.96			
December	807	9.48			
TOTALS	8,520	100.00			

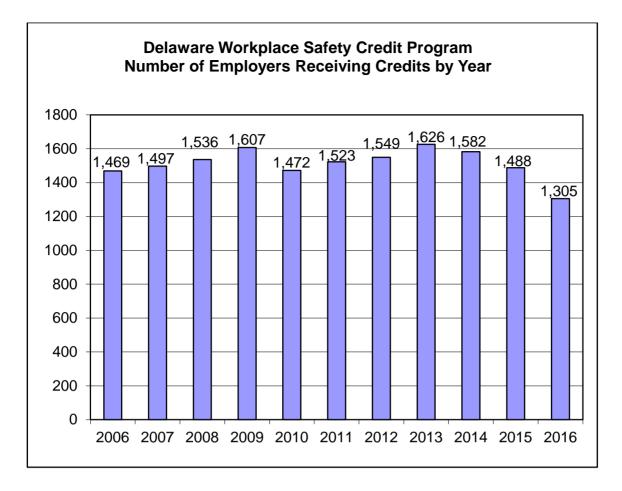


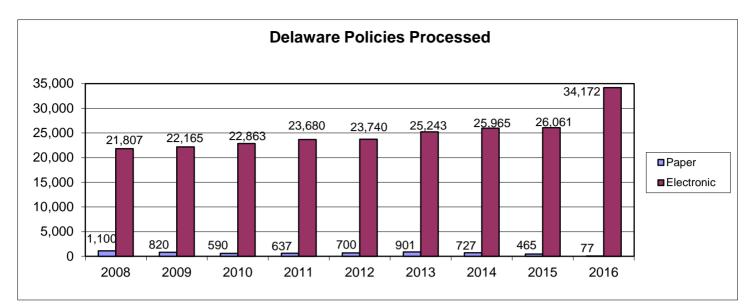


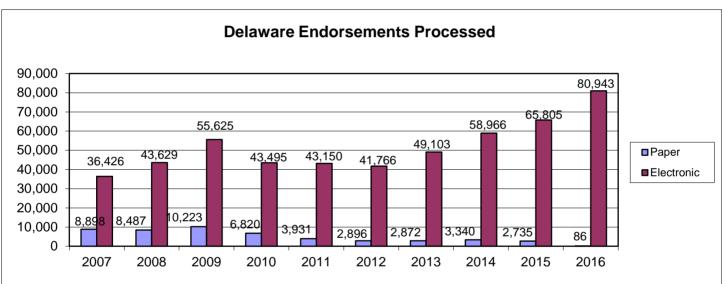
Effective <u>Month</u>	Total <u>Ratings</u>	Percentage
January	861	12.17
February	462	6.53
March	619	8.75
April	633	8.95
May	617	8.72
June	644	9.11
July	594	8.40
August	460	6.50
September	519	7.34
October	576	8.14
November	605	8.55
December	484	6.84
TOTALS	7,074	100.00

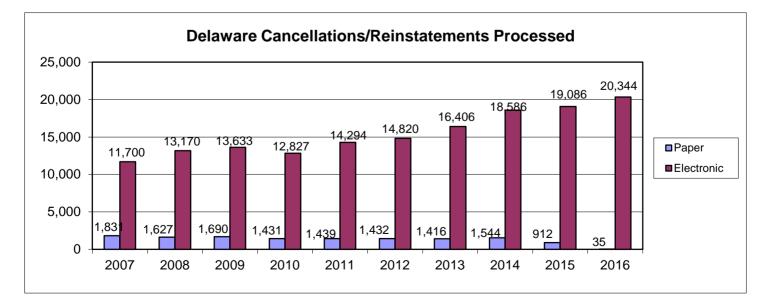
DELAWARE MERIT RATINGS - JANUARY 1, 2016 TO DECEMBER 31, 2016

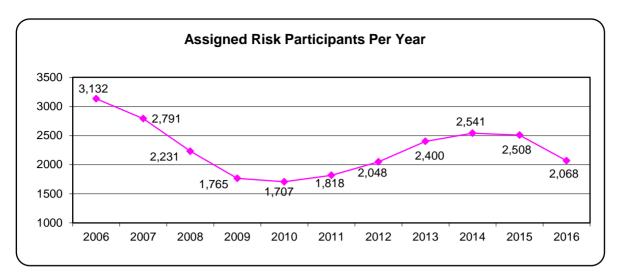


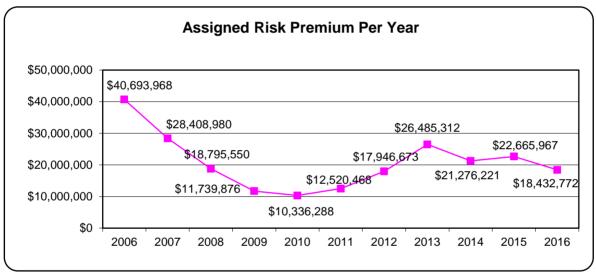


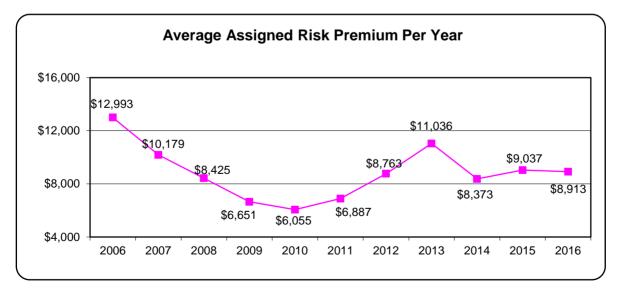


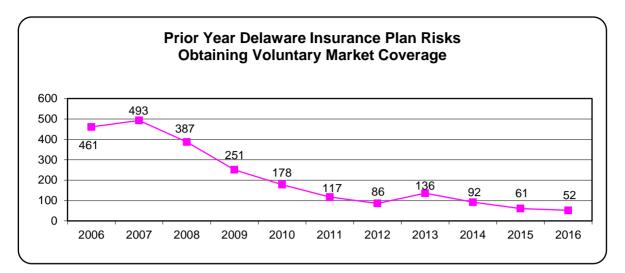


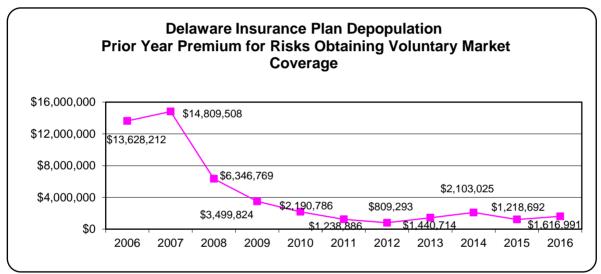


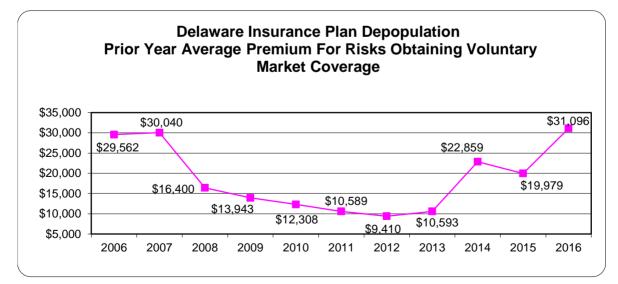












DELAWARE RECEIPTS BY POLICY YEAR AND TYPE OF REPORT

Electronic Media

Type of	Total											
Report	Report	2006	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
First	24,880	-	-	-	-	-	1	2	11	13,364	11,468	34
Second	1,175	3	6	3	-	1	1	4	673	484	-	-
Third	707	1	5	1	-	1	2	397	300	-	-	-
Fourth	443	2	2	1	2	2	262	172	-	-	-	-
Fifth	365	1	1	2	2	207	152	-	-	-	-	-
Sixth	267	-	-	2	160	105	-	-	-	-	-	-
Seven	231	-	-	127	104	-	-	-	-	-	-	-
Eighth	218	-	126	92	-	-	-	-	-	-	-	-
Ninth	185	103	82	-	-	-	-	-	-	-	-	-
Tenth	60	60	-	-	-	-	-	-	-	-	-	-
Total	28,531	170	222	228	268	316	418	575	984	13,848	11,468	34

Hard Copy

Type of	Total											
Report	Report	2006	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
First	0	0	0	0	0	0	0	0	0	0	0	0
Second	0	0	0	0	0	0	0	0	0	0	0	0
Third	0	0	0	0	0	0	0	0	0	0	0	0
Fourth	0	0	0	0	0	0	0	0	0	0	0	0
Fifth	0	0	0	0	0	0	0	0	0	0	0	0
Sixth	0	0	0	0	0	0	0	0	0	0	0	0
Seven	0	0	0	0	0	0	0	0	0	0	0	0
Eighth	0	0	0	0	0	0	0	0	0	0	0	0
Ninth	0	0	0	0	0	0	0	0	0	0	0	0
Tenth	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0