



SAN FRANCISCO FIRE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO

September 1, 2015

The Honorable John K. Stewart
Presiding Judge
Superior Court of California, County of San Francisco
400 McAllister Street
San Francisco, CA 94102

RE: Civil Grand Jury Report – What Does the Future Hold? – Investigation into the San Francisco Fire Department's Emergency Response Issues and Treasure Island Training Facility

The Honorable John K. Stewart:

Thank you for the opportunity to provide a response to the Civil Grand Jury's findings and recommendations regarding the Fire Department's emergency response and the Treasure Island Training Facility.

As the Department discussed with the Civil Grand Jury members during the exit conference, the Department agrees with two of its seven Findings. Of the five remaining Findings, the Department disagrees with one and partially disagrees with four. With regard to the corresponding recommendations, the Department has implemented or will implement eight of the nine Recommendations, and addresses its disagreement to Recommendation R1.2. I have detailed the Department's comments about each Finding and Recommendation in the enclosed matrix.

In addition to the structured responses, the Department has highlighted below specific items in the report that we believe need clarification in order to present a comprehensive report to the public.

Emergency Response Issues

Although the San Francisco Fire Department did not have EMS transport services until the transfer from the Department of Public Health in 1997, Fire Department personnel have historically responded to medical calls and provided Basic Life Support (BLS) since a large number of uniformed members have always possessed EMT certification. Presently, Department members are nearly 97% either certified as an EMT or licensed as a Paramedic.

Applicable Performance Standards (Response Times)

The two-minute mark in the Civil Grand Jury report refers to the time a call is received to the time that Department crews are dispatched. This is strictly a metric for the Department of Emergency Communications (DEC), not for the Fire Department. The standard for the Fire

Department's response is from the moment the Department receives the dispatch from the DEC to the time the Fire Department Unit arrives on scene. Below are the various standards based on the nature of the call and the Unit involved.

- Ambulance – 10 minutes (Code 3) and 20 minutes (Code 2), 90% of the time
- First Advanced Life Support (ALS) – Seven minutes (Code 3), 90% of the time
- First Unit of any type – Four minutes and 30 seconds (Code 3), 90% of the time

EMS Captain Supervision and Ambulance Units Ratio

With three EMS Captains and approximately 15 - 25 ambulances deployed (depending on day and time of day), the Department is within the Local Emergency Medical Services Agency (LEMSA) standard of one EMS Captain for every 10 ambulances. With the fourth EMS Captain being returned to the field this Fiscal Year, the Department's ratio will be even less.

Ambulances in Western Neighborhoods

The dynamic deployment of ambulances has been an effective staffing model. The issue of "clustering," as the report itself acknowledged, can be attributed to the concentration of receiving hospitals in certain neighborhoods; thus, it cannot necessarily be avoided. Additionally, the clustering of ambulances in the downtown area is due to the higher call volume in that neighborhood. The Department is aware of these circumstances, which affect availability of ambulances in the Western neighborhoods, and believes that it could be mitigated with increased staffing provided that fiscal resources for ambulance/equipment procurement and EMS hiring are approved and funded.

The suggestion of 24-hour static ambulances at Fire Stations to alleviate availability of Units in the Western neighborhoods was a work schedule model that was utilized in the early years of the merger. Based on that experience, it was confirmed that 24-hour shifts for Ambulance personnel was untenable primarily due to workload and fatigue concerns.

Aging Equipment

Although it is true that the Department has some ambulance units that need replacing, fleet breakdowns have not caused delays in response times. The Department has always been able to deploy 15 – 25 units as stated above, based on call demand per day of week and/or time of day. Nonetheless, the Department reiterates that it has received and deployed 19 new ambulances in the last 18 months with seven more expected by June 30, 2016, five of which were obtained through grant funding.

Working Conditions

At any one time in the past, there were up to 24 members who would cross paths at Station 49 and only for a brief period of time. This generally occurred as members reported to and returned from duty. Under the new Station 49 work schedule, there will only be up to 12 members at a time who would physically be at Station 49, for a short period of time. While the shifts are ongoing, Station 49 members are at their posting location or responding to calls in the system.

Nevertheless, the Department has made several improvements at Station 49 in recent months, after the Arson Unit vacated their office space at the same location on Evans Street. The Arson Unit was relocated from Station 49 in March, 2015, opening up additional space for the EMS Division. Since that time, the EMS Division space at Station 49 has increased by approximately 5000 sq. ft. The Division has gained 7 private offices, one classroom, a conference room, an additional kitchen and additional restrooms. The men's and women's locker rooms were relocated to larger spaces and will comfortably accommodate the growing Division. The EMS

office reorganization, including the relocation of the Rescue Captain Office to the ground floor, has greatly improved the Division's workflow.

Ultimately, there will be a new Station 49 facility funded through the Health General Obligation Bond that will earmark \$40M for an EMS facility.

Strategic Planning

The Department recognizes that it does not have one formal strategic planning document. The absence of such plan, however, is not an indication that the Department is devoid of standard operating procedures and guidelines, policy manuals and other initiatives addressing the components of a strategic plan.

For example, the Department has a Disaster Response Manual (updated and published in October 2013) that details the mechanics of a large scale response, including the activation of the Department Operations Center, the deployment of NERT volunteers (over 26,476 trained since inception of the program in 1990), Urban Search and Rescue, and personnel recall procedures. The Department has also conducted Disaster Preparedness and All Hazards/Risk Management Training as a complement to the Disaster Response Manual.

The Department, likewise, has had a Fleet Replacement Plan in place since Resolution 2007-05 was adopted by our Fire Commission in 2007. Moreover, the Department regularly confers with the Department of Human Resources Public Safety Team regarding examination scheduling for human resource planning purposes. In addition, the successful passage of the Earthquake Safety and Emergency Response (ESER) 2010 and 2014 Bonds has resulted in significant upgrades to our facilities and also addressed the health, safety and security of our members.

Therefore, the Department is well-prepared to adequately provide the necessary services to the City on a day-to-day basis or in the event of a natural disaster or man-made calamity.

Moreover, through the Division of Homeland Security, the Department has successfully been awarded several grants, including three in the last two calendar months totaling over \$9 Million. Additionally, the Department has successfully evolved and continues to do so with population, call volume and call type changes throughout the years, despite severe fiscal constraints. The Department's inability to meet certain standards in the last couple of years is largely attributable to the absence of funding, rather than to lack of foresight.

The Department reiterates its support of a strategic plan and is appreciative to receive funding in this fiscal year for the necessary resources to effect its development. Spearheaded by the President of the Fire Commission, a Strategic Planning Committee was formed and meetings are underway toward the achievement of this excellent management tool.

Treasure Island Training Facility

The Department agrees with the Civil Grand Jury's two findings related to the Training Facility. Although the Treasure Island Development Authority (TIDA) currently does not have the Department's Training Facility in its future development plans for Treasure Island, the Department strongly believes that there is no other viable location at this time, or in the near future, for its Training Facility due to the large square footage required and the environmental clearance necessary to operate a Live Burn room. In discussions with TIDA, the Department was advised that it would have approximately seven years based on the progression and prioritization of Treasure Island developments before the Training Facility would have to vacate.

Once again, thank you for the opportunity to respond to the Civil Grand Jury report. Please find the matrix, including a section for detailed tables and figures enclosed with this letter.

Sincerely,

A handwritten signature in blue ink that reads "Joanne Hayes-White". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke extending from the "e" in "White".

Joanne Hayes-White
Chief of Department

Enclosures

cc: Clerk of the Board, Attn: Government Audit and Oversight Committee

2014-15 Civil Grand Jury
San Francisco Fire Department, What Does The Future Hold?
Fire Chief Response

CGJ Year	Report Title	Findings	Responding Dept.	2015 Responses (Agree/Disagree) Use the drop down menu	2015 Response Text
2014-15	San Francisco Fire Department What Does the Future Hold?	F1.1. SFFD continues to fail to meet EOA response time standards, resulting in lost revenue for the City.	SFFD Chief of Department	disagree with it, partially (explanation in next column)	The Department acknowledges that it is still a few percentage points short of the EOA standard. However, this shortfall does not directly result in lost revenue as the associated cost of additional staffing to meet the EOA standard is higher than the revenue to be gained for the percentage gap. The Department must balance the need for increased market share with the need for minimal supply of ambulances throughout the City at all hours of the day, including the early hours of the day when the demand for ambulances is minimal. Since January 2015, the SFFD share of the ambulance response has been gradually increasing (Figure F1.1). The SFFD is implementing a number of measures to continue this trend: 1. This year, in April, the SFFD hired a new class of 42 EMTs to increase the number of units available during peak hours. 2. Working with the Emergency Provider Data Working Group, the Department is implementing a new methodology to better match daily staffing levels with the expected ambulance demand. 3. Working with the Private Ambulance Providers, the Department is re-designing the ambulance shifts to take into consideration the private ambulance supply.
2014-15	San Francisco Fire Department What Does the Future Hold?	F1.2. The current dynamic dispatch model fails to meet EMSA response times in the western neighborhoods of the City (Battalions 7, 8, 9 and 10) for several reasons, chief among them the long distance from Station 49 for re-stocking an ambulance during a working shift and the long distance from hospitals, where ambulances tend to congregate in the natural course of their duty.	SFFD Chief of Department	disagree with it, partially (explanation in next column)	In the last few months, the SFFD has made significant improvements in the ambulance response times throughout the City (Figure F1.2, Table F1.2). Improvements have been uniform through all battalions. Although the SFFD continues to work throughout the goal of responding in every battalion within the EMSA Policy 4000 standards, the policy applies to the overall area of the City and not to each battalion individually. As Table F1.2 shows, the Department has been able to minimize response times in the busiest areas of the City while maintaining coverage of all areas of the City. Improvements have been achieved in part through new EMT hires, deployment of new ambulances (vehicles), and additional ambulance demand analyses. Further measures are being implemented presently: 1. Acknowledging the dynamic nature of the ambulance demand, the Department is hiring a new class of per-diem Paramedics (H-8) that will be deployed as-needed based on the projected daily demand. 2. Working with Local 798, the Department is implementing a new 12-hour rotating schedule that provides additional coverage over the existing 12-hour/40-hour work week schedule. 3. Additional software tools will be deployed at the Dispatch Center (DEC) to better determine the location of all ambulances in order to maximize area coverage.

2014-15 Civil Grand Jury
San Francisco Fire Department, What Does The Future Hold?
Fire Chief Response

2014-15	San Francisco Fire Department What Does the Future Hold?	F1.3. A number of firehouses are without paramedic-level service due to a shortage of firefighter/paramedics. The shortage is caused by insufficient cross training of personnel and insufficient training for paramedics.	SFFD Chief of Department	disagree with it, wholly (explanation in next column)	The number of firefighter/paramedic members (H-3) deployed as part of an engine company is between 27 and 30. The Department has chosen the location of these engines in order to minimize ALS response times in all areas of the City. The EMSA Policy 4000 defines the emergency response standard for ALS engines as 7 minutes for 90 percent of the time. The current deployment of ALS engines clearly satisfy this criteria (Table F1.3). The Department has offered multiple training/promotional opportunities for current members of the firefighter rank (H-2) to advance to the firefighter/paramedic rank (H-3). However, very few members have shown interest in this career path.
2014-15	San Francisco Fire Department What Does the Future Hold?	F1.4. SFFD has reduced the mandatory minimum of four Rescue Captains to three, resulting in an increase in span of control from a recommended 10 ambulances per Rescue Captain to 20.	SFFD Chief of Department	disagree with it, partially (explanation in next column)	The Department agrees that the span of control for EMS Captains should be reduced in the current fiscal year. This will be occurring with the revised supervision model at Station 49, allowing for the return of the Station 49 EMS Captain to field operations. However, it should be noted that the workload has only increased slightly for the Rescue Captains. In 2005, the each one of the four RCs responded to an average of 7.48 calls/day. In 2014, each one of the three RCs responded to an average of 7.82 calls/day (about 5% increase).
2014-15	San Francisco Fire Department What Does the Future Hold?	F1.5. SFFD has no formal strategic plan and is not creating such a plan in the near future; the Fire Commission seems a natural group to assist the Chief in this very important venture.	SFFD Chief of Department	disagree with it, partially (explanation in next column)	The absence of a formal strategic plan does not mean that the Department does not have separate, individual strategies to meet the evolving needs of various operational areas. However, the Department does recognize the value of having one organized plan consolidating its strategies and initiatives. The Department received funding this Fiscal Year to secure resources for this purpose, and a Strategic Planning Committee spearheaded by the Fire Commission President has been formed.
2014-15	San Francisco Fire Department What Does the Future Hold?	F2.1. The City could save a significant amount of the \$160 million currently earmarked for a new training facility by keeping the current training center on TI, even if improvements were required	SFFD Chief of Department	agree with finding	
2014-15	San Francisco Fire Department What Does the Future Hold?	F2.3. Most fire departments in the region do not have training facilities comparable to the TI training center (or the new SFFD training center that would replace it). Some of these agencies use the TITC for training and would likely continue use if it remains available, even if the fee structure was converted to include revenue for SFFD and the City.	SFFD Chief of Department	agree with finding	

2014-15 Civil Grand Jury
San Francisco Fire Department, What Does The Future Hold?
Fire Chief Response

CGJ Year	Report Title	Recommendations	Responding Dept.	2015 Responses (implementation) Use the drop down menu	2015 Response Text
2014-15	San Francisco Fire Department What Does the Future Hold?	R1.1 . That by December 2015 the Chief develop a plan and the methodology for bringing response times for both Code 2 and Code 3 calls to required levels, and that the Department achieve compliance with EOA standards by December 2016.	SFFD Chief of Department	The recommendation has been implemented (summary of how it was implemented in next column)	The development of a plan and methodology was formalized in the fall of 2014 with the formation of the City's ambulance work group, headed by the Mayor's Office with representatives from SFFD, DEM, Controller, Board of Supervisors, Fire Commission and other relevant stakeholders. This work group and its various sub groups were responsible for analyzing the issues facing the City's EMS system and developing recommendations to meet both response and EOA metrics for both the SFFD and private providers. A number of these recommendations have been implemented, including additional staffing for the Department, the purchase of new ambulances, and the staffing of a nurse at a DPH shelter. In addition, a number of recommendations have been funded in the new FY15-16 budget or are currently being implemented, such as restoration of the HOME team, per diem employees and other initiatives. There is on-going analysis done to staffing levels, work load, and call volume to regularly monitor the performance of the system, and all invested providers meet regularly to discuss issues and topics of relevance.
2014-15	San Francisco Fire Department What Does the Future Hold?	R1.1.1. The Fire Commission should require the Chief to prepare a monthly report on ambulance performance versus the EOA and the average number of ambulances capable of responding to a service call.	SFFD Chief of Department	The recommendation has been implemented (summary of how it was implemented in next column)	Even before the Civil Grand Jury Report was issued, the Fire Commission had already tasked the Chief of Department to report on ambulance response times and progress toward meeting the EOA. These reports are typically provided by the Deputy Chief of Operations. The Commission has been actively monitoring these issues for years.
2014-15	San Francisco Fire Department What Does the Future Hold?	R1.2 . That by July 2016, the Chief institute a modified static/dynamic model of ambulance deployment to include ambulances based at stations in Battalions 7, 8, 9, and 10 with the remaining ambulance fleet operating out of Station 49.	SFFD Chief of Department	The recommendation will not be implemented because it is not warranted or reasonable (explanation in next column)	There are numerous issues with a model where ambulance employees work a 24-hour shift, as the Department experienced in the early years of the merger with DPH. These include fatigue, safety and deterioration of clinical skills, which result from long work periods at high call volume without adequate rest breaks. In addition, the Department was part of a lawsuit surrounding FLSA overtime at the time it employed the 24-hour ambulance shift model, since employees that work 24-hours on an ambulance are not considered fire suppression employees and are subject to separate labor rules. The 24-hour shift is generally discouraged within the EMS industry. A number of current ambulance posting locations are right by or are very close to existing fire stations; thus, provided that the system has sufficient resources and those postings can be maintained, these areas should then be well covered within the dynamic ambulance deployment model.
2014-15	San Francisco Fire Department What Does the Future Hold?	R1.2.1. The Civil Grand Jury recommends the number of supply trips from Station 49 be reduced through the implementation of a secure inventory reserve at some stations or by contracting with a medical supply company to restock supplies at firehouses.	SFFD Chief of Department	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	The Department is currently developing a plan to increase counts of medical supplies and establish satellite "caches" at various fire stations and other locations throughout the City to allow ambulance crews to re-stock their ambulances without having to travel back to Station 49.

2014-15 Civil Grand Jury
San Francisco Fire Department, What Does The Future Hold?
Fire Chief Response

2014-15	San Francisco Fire Department What Does the Future Hold?	R1.3. That by July 2017, the Chief schedule sufficient new training academies so that all engines will have a paramedic on every crew.	SFFD Chief of Department	The recommendation requires further analysis (explanation of the scope of that analysis and a timeframe for discussion, not more than six months from the release of the report noted in next column)	There are additional on-going costs to the Department to staff all engines with H-3 FF/PMs that are above and beyond what is incorporated in the Department's Operating budget. The Department is currently meeting its first ALS on-scene response time metrics Citywide, and is increasing staff in its H-3 FF/PM tier through the hiring of Paramedics from within into the Fire Academy. The Department's goal is to achieve 32 daily ALS engines out of 44 by the end of the fiscal year. In addition, there is much debate within the health care industry as to whether an ALS-capable resource makes an impact on patient survival rate and quality of care when compared to a BLS resource. This is an issue that will continue to be analyzed, both at the Department and City levels.
2014-15	San Francisco Fire Department What Does the Future Hold?	R1.4. That the span of control for Rescue Captains be reduced in the next fiscal year, bringing the Department into compliance with Admin Code 2A.97	SFFD Chief of Department	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	The Department agrees that the span of control for EMS Captains should be reduced in the current fiscal year. This will be occurring with the revised supervision model at Station 49, allowing for the return of the Station 49 EMS Captain to field operations. This would restore the number of 24-hour EMS Captains working as medical supervisors to four.
2014-15	San Francisco Fire Department What Does the Future Hold?	R1.5. That by December 2015 the Chief, using funds allocated in the next budget year, contract with an experienced consultant to initiate a strategic plan covering: full funding for equipment renewal; facilities maintenance and updates; communication technology; and training for both normal operations and disasters	SFFD Chief of Department	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	The issue of strategic planning has been a priority for the Department, but its development and implementation had been hampered by the lack of fiscal resources. In the new fiscal year's budget, the Department was allocated additional personnel to enhance the Department's planning capabilities. The Chief has recently formed the Department's Strategic Planning Committee, and this committee had its initial kick-off meeting last month. However, the caveat is that, even with a thorough and robust strategic plan, there is no guarantee that funding will be available to fully support the plan. This is an issue that the Department has been struggling with in the past (such as with the Department's existing vehicle replacement plan) and will continue to do so in the future, even with the improved economic conditions.
2014-15	San Francisco Fire Department What Does the Future Hold?	R2.1. That the Chief review the current agreement with TIDA to determine whether it is possible to amend the agreement so as to retain the existing location of the training facility.	SFFD Chief of Department	The recommendation has been implemented (summary of how it was implemented in next column)	The Department believes that the best option would be to retain the current Treasure Island Training facility. However, this will take many discussions and coordination with TIDA, the Mayor's Office, and a number of other entities, to possibly implement. If a decision to retain the facility is mutually reached, the Department would then begin developing plans to upgrade the facility and potentially have it used as a regional facility to generate revenue for the Department.
2014-15	San Francisco Fire Department What Does the Future Hold?	R2.3 That while Recommendations 2.1 and 2.2 are being explored, the Chief and the Fire Commission determine an alternate site for the training center since, if an already City-owned site is not adequate to serve as a training center, purchase of a new site will be more than difficult in the current real estate market.	SFFD Chief of Department	The recommendation has been implemented (summary of how it was implemented in next column)	A request for funds has been submitted to Capital Planning for the construction of a new training facility. The request continues to be deferred due to the large cost of the project. Given the economic and construction climate in the City currently, it is highly unlikely that the Department would find a suitable space large enough to accommodate the needs of the Training Facility. Moreover, the chances of passing an EIR with the Live Burn portion of the facility would likewise be slim. Even if that theoretical plot of land could be found and the Department would receive a favorable EIR, the acquisition costs would be astronomical. There were discussions many years ago about allocating a portion of the new Hunters Point development for a new facility, but it does not appear that this was included in the current plans for the shipyard.

Figure F1.1: SFFD Ambulance Share

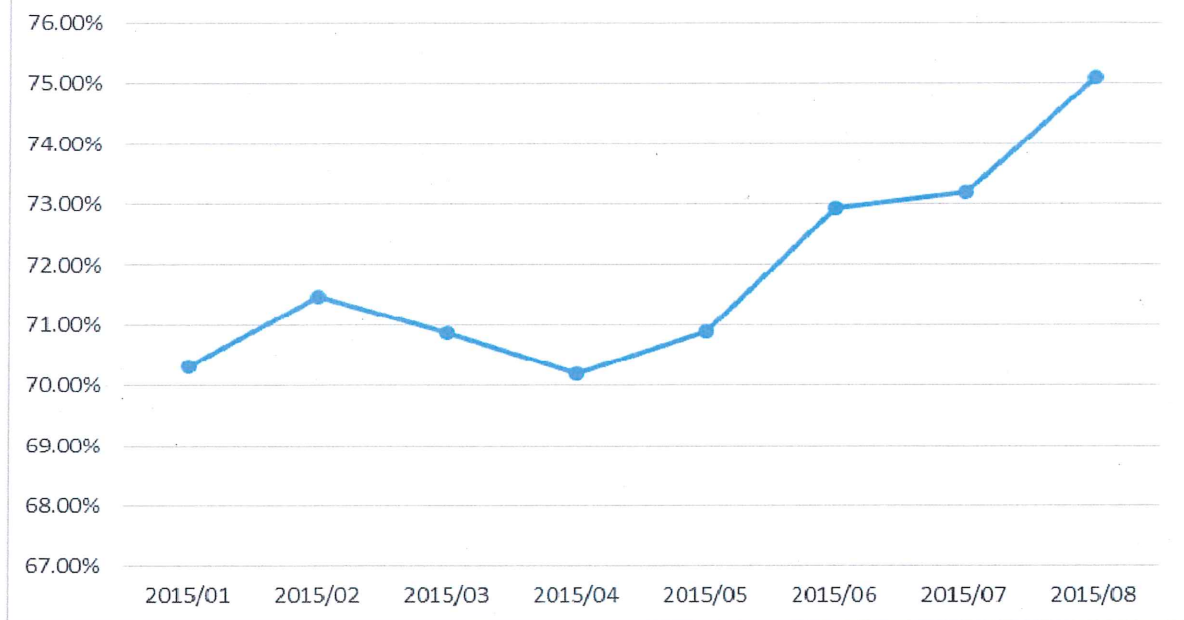


Figure F1.2.A: Emergency Ambulance Response By Battalion

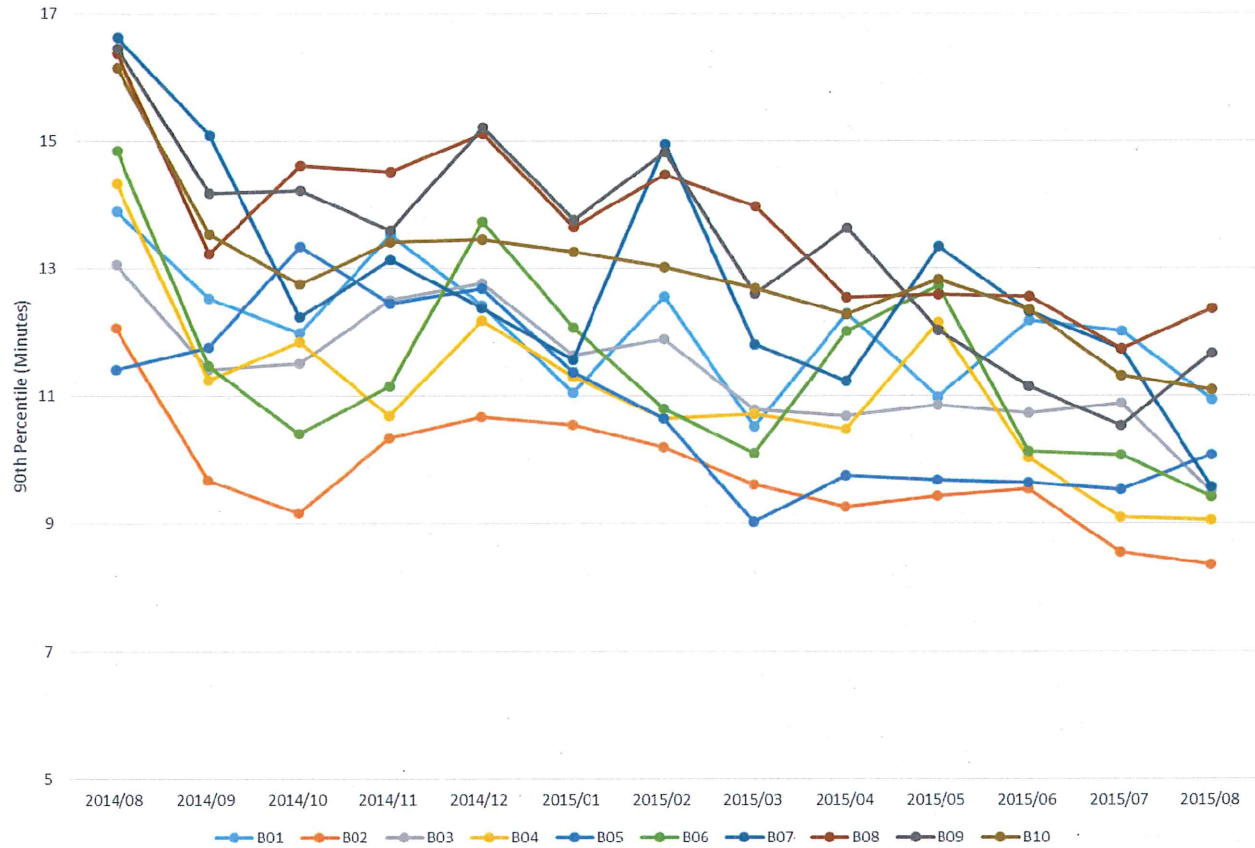


Table F1.2.A: Ambulance Emergency Response (Minutes) - 90th Percentile By Battalion

YEAR	B01	B02	B03	B04	B05	B06	B07	B08	B09	B10
2014/08	13.90	12.08	13.07	14.34	11.42	14.85	16.62	16.38	16.46	16.16
2014/09	12.53	9.68	11.42	11.24	11.77	11.47	15.08	13.23	14.18	13.54
2014/10	11.99	9.17	11.51	11.85	13.34	10.41	12.23	14.62	14.22	12.75
2014/11	13.53	10.33	12.51	10.69	12.44	11.15	13.13	14.52	13.59	13.42
2014/12	12.42	10.68	12.77	12.18	12.68	13.73	12.38	15.12	15.22	13.45
2015/01	11.06	10.55	11.64	11.30	11.37	12.08	11.57	13.65	13.77	13.26
2015/02	12.57	10.20	11.88	10.65	10.65	10.81	14.95	14.48	14.83	13.02
2015/03	10.52	9.61	10.78	10.72	9.03	10.11	11.81	13.98	12.60	12.68
2015/04	12.30	9.27	10.69	10.48	9.76	12.01	11.23	12.54	13.64	12.28
2015/05	10.98	9.43	10.85	12.16	9.69	12.72	13.35	12.60	12.04	12.83
2015/06	12.19	9.55	10.74	10.03	9.64	10.13	12.32	12.56	11.16	12.36
2015/07	12.02	8.55	10.89	9.10	9.53	10.07	11.73	11.73	10.53	11.32
2015/08	10.95	8.36	9.50	9.06	10.07	9.42	9.57	12.37	11.67	11.10

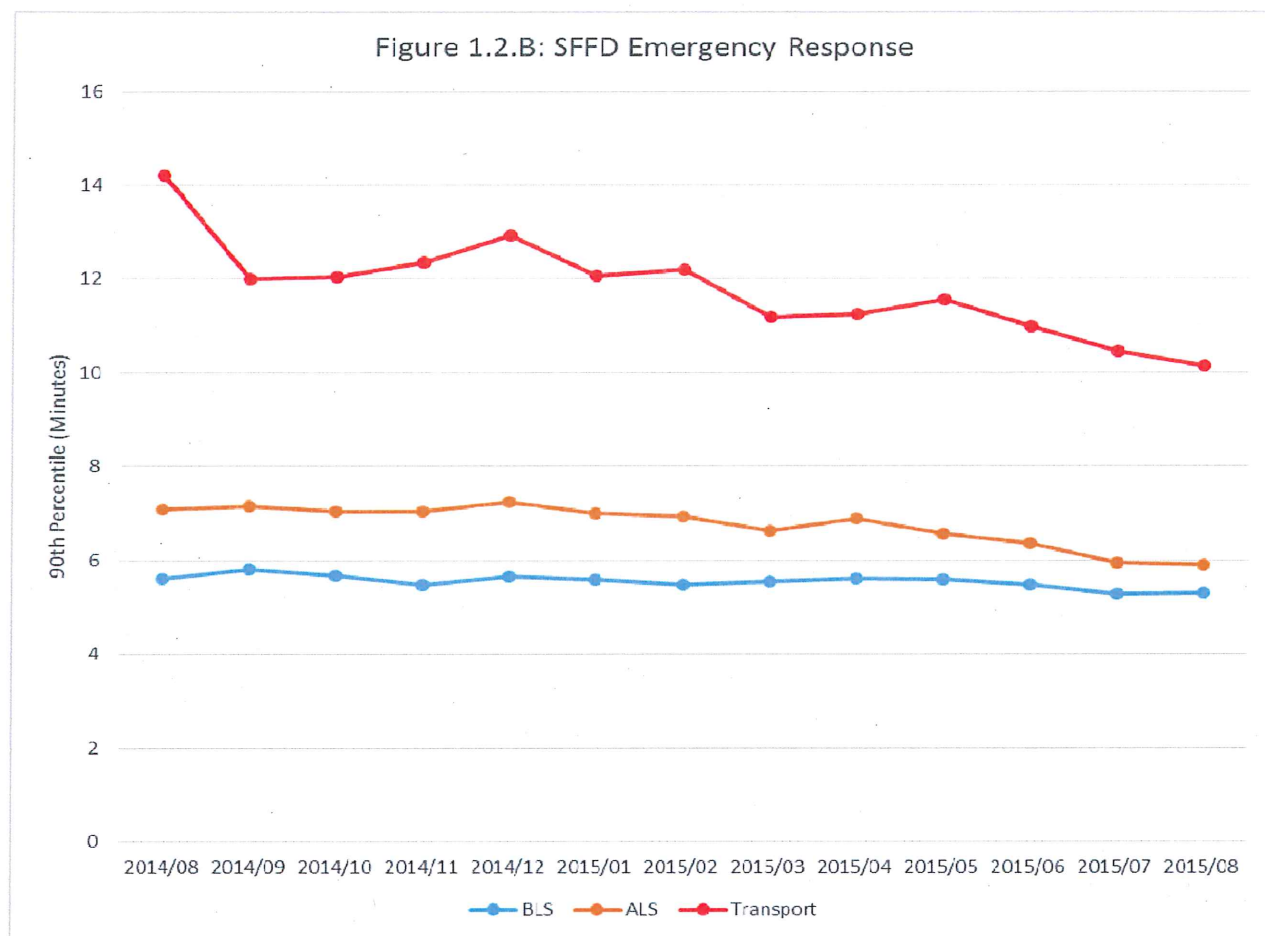


Table F1.2.B: Percentage of Calls By Battalion

YEAR	B01	B02	B03	B04	B05	B06	B07	B08	B09	B10
2014/08	9.51%	20.83%	20.68%	9.45%	7.07%	6.40%	4.16%	7.04%	7.04%	7.82%
2014/09	8.52%	21.47%	18.68%	8.23%	7.83%	6.45%	4.63%	7.94%	7.92%	8.32%
2014/10	8.90%	22.14%	19.27%	9.36%	7.47%	6.74%	4.63%	7.12%	6.90%	7.47%
2014/11	9.50%	20.29%	19.09%	9.00%	7.16%	6.37%	4.53%	7.28%	8.10%	8.68%
2014/12	9.89%	20.20%	19.06%	9.94%	7.25%	6.06%	4.24%	7.83%	7.88%	7.65%
2015/01	9.38%	20.11%	18.29%	10.57%	7.54%	6.23%	4.84%	7.42%	7.97%	7.64%
2015/02	8.44%	18.62%	19.79%	9.12%	7.41%	7.00%	5.29%	7.79%	8.32%	8.21%
2015/03	9.42%	21.33%	19.88%	8.44%	6.96%	6.42%	4.71%	7.74%	7.27%	7.84%
2015/04	9.57%	20.43%	19.74%	9.15%	7.24%	6.22%	4.56%	7.46%	6.58%	9.04%
2015/05	9.63%	20.83%	19.08%	8.93%	7.44%	6.19%	4.65%	7.00%	7.49%	8.77%
2015/06	9.79%	21.05%	19.06%	8.02%	7.42%	6.19%	4.85%	7.55%	7.36%	8.70%
2015/07	10.08%	21.38%	19.30%	8.06%	7.09%	6.48%	4.46%	6.84%	7.06%	9.25%
2015/08	10.15%	20.89%	19.19%	8.75%	8.14%	5.41%	4.24%	6.89%	7.74%	8.59%

Table F1.3: ALS Emergency Response

Month	Calls	90th Percentile (Minutes)
2014/08	3,691	7.10
2014/09	3,663	7.16
2014/10	3,888	7.04
2014/11	3,594	7.05
2014/12	4,003	7.25
2015/01	4,206	7.00
2015/02	3,591	6.93
2015/03	4,097	6.62
2015/04	3,842	6.88
2015/05	4,052	6.56
2015/06	3,872	6.35
2015/07	3,795	5.94
2015/08	3,951	5.90