



SAN FRANCISCO FIRE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO

September 19, 2016

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 – Fire Safety Inspections in San Francisco - A Tale of
Two Departments: Department of Building Inspection & San Francisco Fire
Department

The Honorable Judge Stewart:

Thank you for the opportunity to provide a response to the Civil Grand Jury's findings
and recommendations to the 2016 Civil Grand Jury report, entitled *Fire Safety
Inspections in San Francisco*.

The San Francisco Fire Department (SFFD) is continuously seeking ways to improve
upon existing processes and exploring ways of adopting new best practices to serve the
citizens of San Francisco and ensure their fire safety.

It is important to note a missed opportunity in the collection of information for this report.
According to Ms. Alison Scott, Foreperson, Pro Tem, the Civil Grand Jury "ran out of
time" and therefore was unable to interview the Fire Marshal and the Chief of
Department for this report. This would have allowed the Civil Grand Jury greater
opportunity to be briefed on historical practices with regard to fire safety inspections, as
well as projects underway that will continue to improve and optimize our current
practices. As Chief of Department, I have always been afforded the opportunity to
provide context and overall perspective to all previous Civil Grand Jury reports.

There are many new and evolved fire safety inspection processes and program
improvements that have been defined, developed and are being implemented. In fact,
these same programs align with many of the recommendations set forth by the Civil
Grand Jury in their 2016 Report as you will see in the Department's matrix responding
to the Findings and Recommendations of the Civil Grand Jury.

When evaluating the recommendations of the Civil Grand Jury, it is important to
understand that the Department of Building Inspection (DBI) and the Fire Department's
business model are very distinct from the SFFD Fire Suppression's Truck and Engine
Companies. DBI has staffing dedicated to R2 inspections, whereas the SFFD

Fire Suppression Truck and Engine Companies are first and foremost tasked with first responder duties.

In addition to the enclosed matrix and corresponding detailed commentary on process improvements, the Department believes that some of the broader findings outlined in the Grand Jury report must also be addressed so as to successfully respond to challenges being faced by the City and County of San Francisco. In particular, the Grand Jury's assessment that growth and overcrowding are having unintended consequences and an impact on fire safety.

The other foundational finding of the Civil Grand Jury that extends beyond the Fire and Building Department is the current use of IT Systems. The SFFD recognizes the need for stronger communication tools and a framework to illustrate how collaboration between SFFD and DBI can enable an increased level of transparency and an overall improved IT system. SFFD is working diligently with DBI and the Department of Technology to achieve this goal.

Thank you for the opportunity to respond to the Civil Grand Jury report. Should you have any questions, please feel free to contact me at 415-558-3401.

Sincerely,



Joanne Hayes-White
Chief of Department

Enclosures

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

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Fire Safety Inspections in San Francisco, June 2016
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CGJ Year	Report Title	Findings	Responding Dept.	2016 Responses (Agree/Disagree)Use the drop down menu	2016 Response Text
2015-2016	Fire Safety Inspections in San Francisco	F.II.1. Because station house Companies do not inspect all the R-2s in San Francisco every twelve months as mandated by Code, San Franciscans may be exposed to unnecessary risks.	SFFD Deputy Chief of Operations	disagree with it, partially (explanation in next column)	The Department works with Station House Companies to minimize the risk related to inspections of R-2s.
2015-2016	Fire Safety Inspections in San Francisco	F.II.2. Station house Companies cannot always get into R-2s to inspect them because Company Captains rarely schedule R-2 inspections in advance.	Deputy Chief of Operations	disagree with it, partially (explanation in next column)	Generally the only reason R-2's have not been completed is because crews cannot gain access to the building. On some occasions the contact information is also obsolete.
2015-2016	Fire Safety Inspections in San Francisco	F.II.3. Contact information is not included on the Inspection Worksheets that Company Captains take with them to document their R-2 inspections in advance.	SFFD MIS	agree with finding	This information is now available on the R-2 inspection form.
2015-2016	Fire Safety Inspections in San Francisco	F.II.4. R-2 inspections are not conducted on the weekends.	Deputy Chief of Operations	agree with finding	We are looking into possibly changing that practice. Normally on weekends, the Department holds larger scale drills and inspect hydrants. Also, there are many special events that occur in the City on the weekends that we are responsible for covering.
2015-2016	Fire Safety Inspections in San Francisco	F.II.5. Companies with the ten largest R-2 lists have most of the largest backlogs because R-2 inspections are disproportionately distributed among the Companies and not sufficiently redistributed to nearby Companies with less R-2s to inspect.	Deputy Chief of Operations	disagree with it, partially (explanation in next column)	The Battalion Chiefs monitor Station House Companies' workload, particularly Companies with large R-2 lists. At the time of this writing companies should be able to complete all R-2's assigned if access to the buildings is possible and the contact information is up to date.
2015-2016	Fire Safety Inspections in San Francisco	F.II.6. Company Captains prioritize which R-2s they will inspect based on location of the R-2 rather than on the deadline for each inspection. As a result, some R-2s are not inspected by their deadline.	Deputy Chief of Operations	disagree with it, wholly (explanation in next column)	Company Officers are directed to complete all R-2's assigned by deadline. As described above, access to all buildings may not be possible by the deadline. The Inspection compliance rate was 94% in 2015.

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2015-2016	Fire Safety Inspections in San Francisco	F.II.7. Some Battalion Chiefs' follow-up on Company inspection backlogs is insufficient because it does not hold the Company accountable for the backlog.	Deputy Chief of Operations	agree with finding	Battalion Chiefs follow up with Station House Companies regarding inspection backlogs on a regular basis.
2015-2016	Fire Safety Inspections in San Francisco	F.II.8. Because firefighters' primary motivation for inspecting R-2s is to develop building awareness, they may not sufficiently give equal importance to code compliance when conducting R-2 inspections.	Deputy Chief of Operations	disagree with it, partially (explanation in next column)	Firefighters' consider both factors with equal importance.
2015-2016	Fire Safety Inspections in San Francisco	F.II.9. Many Company Captains seem to know little about Fire Prevention or Code Enforcement. Since firefighters interact with the public, this is a missed opportunity to educate the public about the inspection and enforcement process.	SFFD Deputy Chief of Operations	disagree with it, partially (explanation in next column)	All Company Officers are trained in Fire Prevention and Code Enforcement, as well as identification of code violations. In addition, the Bureau of Fire Prevention is developing a module to further enhance Company Officers' understanding of Fire Code and Fire Prevention.
2015-2016	Fire Safety Inspections in San Francisco	F.II.10. A significant number of fire alarm, blocked exits and sprinkler complaints took more than two months to be resolved.	The Fire Marshall	disagree with it, partially (explanation in next column)	The standard for complaint resolution is 30 to 90 days. 72% of all fire alarm complaints were resolved within two months; 83% of all blocked exit complaints were resolved within two months; 52% of all sprinkler complaints were resolved within two months. The Department is exploring opportunities to improve the rate at which complaints are resolved, including conducting weekend inspections. In addition, the Department will develop performance benchmarks for timely resolution of complaints. Currently, the Department evaluates each open case and unique circumstances that may cause a delay in resolution.
2015-2016	Fire Safety Inspections in San Francisco	F.II.11. Most fire alarm, blocked exits and sprinkler violations took longer to correct than the timeframes district inspectors stated for correction.	The Fire Marshall	disagree with it, partially (explanation in next column)	The BFP is developing process improvements to reduce the timeframes for inspection corrections. While one can postulate about what these are, in the estimation of BFP, the amended processes set forth earlier in this document will address this matter moving forward.

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2015-2016	Fire Safety Inspections in San Francisco	F.11.12. District inspectors' workload was too heavy for them to investigate all R-2 complaints in a timely manner.	The Fire Marshall	disagree with it, wholly (explanation in next column)	It has been a long standing BFP policy to prioritize fire complaints. It is the duty of the Inspector to notify his/her officer if the workload is "too heavy" to address fire complaints in a timely manner. Additionally, it is the duty of the supervising officer to monitor the progress of the Inspectors in their section. If it is determined that the volume is too high to address the fire complaints in an appropriate timeframe, the supervising officer is responsible for bringing this to the attention of the Captain of Administration. The Captain would then load balance and/or seek additional resources to respond to fire complaints.
2015-2016	Fire Safety Inspections in San Francisco	F.11.13. District inspectors prioritized reviewing construction projects and phone calls over inspecting R-2 complaints. As a result, some R-2 complaints and violations were not corrected in a timely manner.	The Fire Marshall	disagree with it, wholly (explanation in next column)	It has been a long standing BFP policy to prioritize fire complaints. The Department follows existing protocol to ensure that complaints are addressed in a timely manner. Additionally, it is the duty of the supervising officer to monitor the progress of the Inspectors in their section. If it is determined that the volume is too high to address the fire complaints in an appropriate timeframe, the supervising officer is responsible for bringing this to the attention of the Captain of Administration. The Captain would then load balance and/or seek additional resources to respond to fire complaints. The SFFD, Bureau of Fire Prevention has established a dedicated Fire Complaints section which will consolidate all incoming complaints (vs. the former model whereby the complaints were taken in, managed and addressed on a district by district basis). This will eliminate the need to balance fire complaint inspections with construction and referral inspections.
2015-2016	Fire Safety Inspections in San Francisco	F.11.14. Because some district inspectors did not document inspections and code enforcement in sufficient detail, follow up on violations was hampered.	The Fire Marshall	agree with finding	This will be addressed through the Bureau's Inbound Training Program: Fire Complaint Process, Inter-departmental referral Process and Fire Complaint Tracking and Life Cycle Management.

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2015-2016	Fire Safety Inspections in San Francisco	F.II.15. Some Company Captains do not document inspections in enough detail for district inspectors to easily identify the violation and conduct code enforcement.	SFFD Deputy Chief of Operations	agree with finding	Company Officers will be instructed to provide more comprehensive responses via Module, which is being developed.
2015-2016	Fire Safety Inspections in San Francisco	F.II.16. After the Inspection Worksheet was made longer in July 2015, some Company Captains document too many items that are not violations.	SFFD Deputy Chief of Operations	agree with finding	The Fire Marshal is developing a training module for all Chief and Company Officers, so they are clear on what is expected of them when performing inspections.
2015-2016	Fire Safety Inspections in San Francisco	F.II.17. Some Company Captains do not print the Inspection Worksheet and bring it to the R-2 inspection. Without having the Inspection Worksheet they may miss something or be inclined to document less. For example, the Inspection Worksheet states that "Company Officer shall obtain and update the responsible party information."	SFFD Deputy Chief of Operations	agree with finding	BFP is developing a training module to address improvements in the Inspection process. The training module is expected to be completed January, 2017.
2015-2016	Fire Safety Inspections in San Francisco	F.II.18. BFP does not have effective code enforcement tools, such as, an administrative hearing.	The Fire Marshall	disagree with it, wholly (explanation in next column)	The San Francisco Fire Code has provisions for Notices of Violation, Administrative Citations, and Administrative Hearings. This report outlines a framework which details the fire complaint process, lifecycle management, which all Inspectors shall follow. Please refer to I. Code Enforcement Process; Complaint Process Flowchart.

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2015-2016	Fire Safety Inspections in San Francisco	F.II.19. Accelerated Code Enforcement is rarely used.	The Fire Marshall	agree with finding	ACE has been integrated into the new closed loop fire complaint process.
2015-2016	Fire Safety Inspections in San Francisco	F.II.20. The SFFD website does not include enough information about the annual inspection and code enforcement processes for property owners and the public to understand them. Being better informed about the process may result in better compliance by property owners and increase the publics' confidence in SFFD enforcement efforts.	SFFD Management Information Systems	agree with finding	Information about the annual inspection and code enforcement processes will be posted in the SFFD website by March 2017.
2015-2016	Fire Safety Inspections in San Francisco	F.11.21. Inspection records are only available in person at the Bureau of Fire Prevention after making an appointment.	Chief of SFFD	agree with finding	The Department is currently working on IT enhancements to allow the public access fire records online, in conjunction with Department of Building Inspection and City Planning.
2015-2016	Fire Safety Inspections in San Francisco	F.11.22. Although instructions for reviewing inspection records is available on the SFFD website, the phone number for making appointment is not included with the instructions.	SFFD Management Information Systems	agree with finding	The SFFD website includes a link to all relevant SFFD numbers. We will also add the correct number to call to this page.
2015-2016	Fire Safety Inspections in San Francisco	F.11.23. Safety concerns may be reported online or by calling the BFP. Although instructions for reporting a safety concern are available on the SFFD website, the BFP phone number is not included on the same page as the instructions.	SFFD Management Information Systems	agree with finding	The SFFD website includes a link to all relevant SFFD numbers. We will also add the correct number to call to this page.

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CGJ Year	Report Title	Recommendations	Responding Dept.	2016 Responses (implementation) Use the drop down menu	2016 Response Text
2015-2016	Fire Safety Inspections in San Francisco	R.II.1. The Deputy Chief of Operations should require Battalion Chiefs to closely monitor Company R-2 inspection lists to ensure that every R-2 in San Francisco is inspected by its deadline.	SFFD Deputy Chief of Operations	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	The Department will require Battalion Chiefs to monitor R-2 lists more closely. This change will be implemented in January 2017.
2015-2016	Fire Safety Inspections in San Francisco	R.II.2. The Deputy Chief of Operations should require that Company Captains make inspection appointments in advance, whenever they have the property owner's phone number, to ensure that Companies get into all R-2s. The appointments should have a three hour window.	SFFD Deputy Chief of Operations	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	The Department disagrees with the 3 hour appointment, however agrees on calling owners to set up an arrangement to meet a responsible party. This change will be implemented in January 2017.
2015-2016	Fire Safety Inspections in San Francisco	R.II.3. SFFD MIS should ensure property owner contact information is included on the Inspection Worksheets.	SFFD Management Information Systems	The recommendation has been implemented (summary of how it was implemented in	This information is now available on the R-2 inspection form.
2015-2016	Fire Safety Inspections in San Francisco	R.II.4. The Deputy Chief of Operations should require Companies to inspect R-2s on the weekend if that Company is going to have a backlog during a particular month.	SFFD Deputy Chief of Operations	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	This will be implemented in January 2017 as a pilot program, for which the Department has sufficient existing budgetary authority in the FY 2016-17 and FY 2017-18 budget.

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2015-2016	Fire Safety Inspections in San Francisco	R.II.5. The Deputy Chief of Operations should redistribute R-2 inspection from Companies that have a backlog to nearby Companies that have fewer R-2 inspections so that the number of R-2 inspections is more evenly distributed among neighboring station houses and are conducted more timely.	SFFD Deputy Chief of Operations	The recommendation will not be implemented because it is not warranted or reasonable (explanation in next column)	The Department disagrees on this recommendation. Companies should stay in their first –in district as much as possible, otherwise it is a risk to residents in their first alarm area. The FY 2016-17 and FY 2017-18 budget provides for six additional Fire Prevention positions—four inspectors, one investigator, one captain, and one fire protection engineer—to improve fire safety outreach and education. Working closely with the Department of Building Inspection and other City and community partners, these positions proactively address fire safety concerns and complaints, as well as distribution concerns related to workloads. This is to be implemented in January 2017.
2015-2016	Fire Safety Inspections in San Francisco	R.II.6. The Deputy Chief of Operations should instruct Company Captains to give priority to R-2 inspections which have exceeded or are approaching their deadlines.	SFFD Deputy Chief of Operations	The recommendation has been implemented (summary of how it was implemented in next column)	This has been the practice and will continue.
2015-2016	Fire Safety Inspections in San Francisco	R.II.7. Battalion Chiefs should review progress on their Companies' R-2 lists at least once a month, and if they find a Company has not inspected all the R-2s on their list, hold that Company accountable by requiring that they inspect all the late R-2s by the end of the next month.	SFFD Deputy Chief of Operations	The recommendation has been implemented (summary of how it was implemented in next column)	Battalion Chiefs currently review progress on Station House Companies' R-2 lists monthly. Should a Company not inspect all the R-2s on their list, the Battalion Chief requires that the Company inspect all the late R-2s by the end of the following month, as has been the Department's practice.
2015-2016	Fire Safety Inspections in San Francisco	R.II.8. The Deputy Chief of Operations should ensure that inspection training for firefighters includes stressing the two reasons for conducting R-2 inspections--to ensure code compliance and gain building awareness--are equally important.	SFFD Deputy Chief of Operations	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	A training module is being developed by the Fire Marshal and will be implemented in January 2017.

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2015-2016	Fire Safety Inspections in San Francisco	R.II.9. The Deputy Chief of Operations should ensure that all firefighters receive training on the R-2 inspections process that includes a detailed module on the Bureau of Fire Prevention code enforcement process which starts with when a BFP inspector receives a complaint from a Company Captain to an NOV being issued and any additional steps. The training should occur after BFP implements the new code enforcement process. Knowing more about BFP will help firefighters better understand their role in ensuring code compliance.	SFFD Deputy Chief of Operations	The recommendation has been implemented (summary of how it was implemented in next column)	Officers have been trained on how to conduct R-2's. Their knowledge will be enhanced by new a training module being developed by the Fire Marshal. Firefighters will also be required to take the new R2 training module. This will be implemented in January 2017.
2015-2016	Fire Safety Inspections in San Francisco	R.II.10. The Fire Marshall should require that complaint response time and code enforcement timeframes be more closely monitored so that resolution time is shortened.	The Fire Marshall	The recommendation has been implemented (summary of how it was implemented in next column)	The Framework has been developed (Fire Complaint Process and Fire Complaints Section). The Lieutenant will be responsible for submitting a bi-monthly report on the status of Fire Complaints. Please refer to: I. Code Enforcement Process; Complaint Process Flowchart; II Code Enforcement - Staffing Model
2015-2016	Fire Safety Inspections in San Francisco	R.II.11. The Fire Marshall should require that code enforcement for NOV's be more closely monitored so that NOV's are corrected more quickly.	The Fire Marshall	The recommendation has been implemented (summary of how it was implemented in next column)	Fire Complaints Section has been created, please refer to I. Code Enforcement Process. Complaint process is being consolidated under a separate Fire Complaint Section. The team's, (one Lieutenant and six Inspectors), primary responsibility is to respond to/process fire complaints. The Lieutenant will be responsible for submitting a bi-monthly report on the status of Fire Complaints.

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2015-2016	Fire Safety Inspections in San Francisco	R.II.12. The Fire Marshall should require that BFP inspectors (that work on R-2 complaints) have reasonable workloads so they can ensure timely correction of all complaints and violations.	The Fire Marshall	The recommendation has been implemented (summary of how it was implemented in next column)	Fire Complaints Section has been created, please refer to I. Code Enforcement Process. Complaint process is being consolidated under a separate Fire Complaint Section. The team staffed with one Lieutenant and six Inspectors is primarily responsible to respond to/process fire complaints. The Lieutenant will be responsible for submitting a bi-monthly report on the status of Fire Complaints.
2015-2016	Fire Safety Inspections in San Francisco	R.II.13. The Fire Marshall should ensure that BFP inspectors (that work on R-2 complaints) not prioritize other work over R-2 complaints if that means that they cannot investigate all their R-2 complaints in a timely manner.	The Fire Marshall	The recommendation has been implemented (summary of how it was implemented in next column)	Fire Complaints Section has been created, please refer to I. Code Enforcement Process. Complaint process is being consolidated under a separate Fire Complaint Section. The team, (one Lieutenant and six Inspectors), primary responsibility is to respond to/process fire complaints. The Lieutenant will be responsible for submitting a bi-monthly report on the status of Fire Complaints.
2015-2016	Fire Safety Inspections in San Francisco	R.II.14. The Fire Marshall should standardize inspection and code enforcement documentation done by BFP R-2 inspectors.	The Fire Marshall	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	A strategy and framework has been developed. Please refer to IV A.(Intra Departmental) and "Fire Complaint Tracking and Lifecycle Management". Anticipated completion time of 60 to 90 days.
2015-2016	Fire Safety Inspections in San Francisco	R.II.15. The Deputy Chief of Operations should standardize inspection documentation done by Company Captains so that BFP inspectors can easily identify and follow-up on complaints.	SFFD Deputy Chief of Operations	The recommendation has been implemented (summary of how it was implemented in next column)	This has been the practice, however the current documentation and procedures will be enhanced by the Fire Marshal's training module.
2015-2016	Fire Safety Inspections in San Francisco	R.II.16. The Deputy Chief of Operations should ensure that Company Captains are trained to identify violations and document only items that are violations.	SFFD Deputy Chief of Operations	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	Company Captains' knowledge will be enhanced by a new training module being developed by the Fire Marshal. This will be implemented in January 2017.

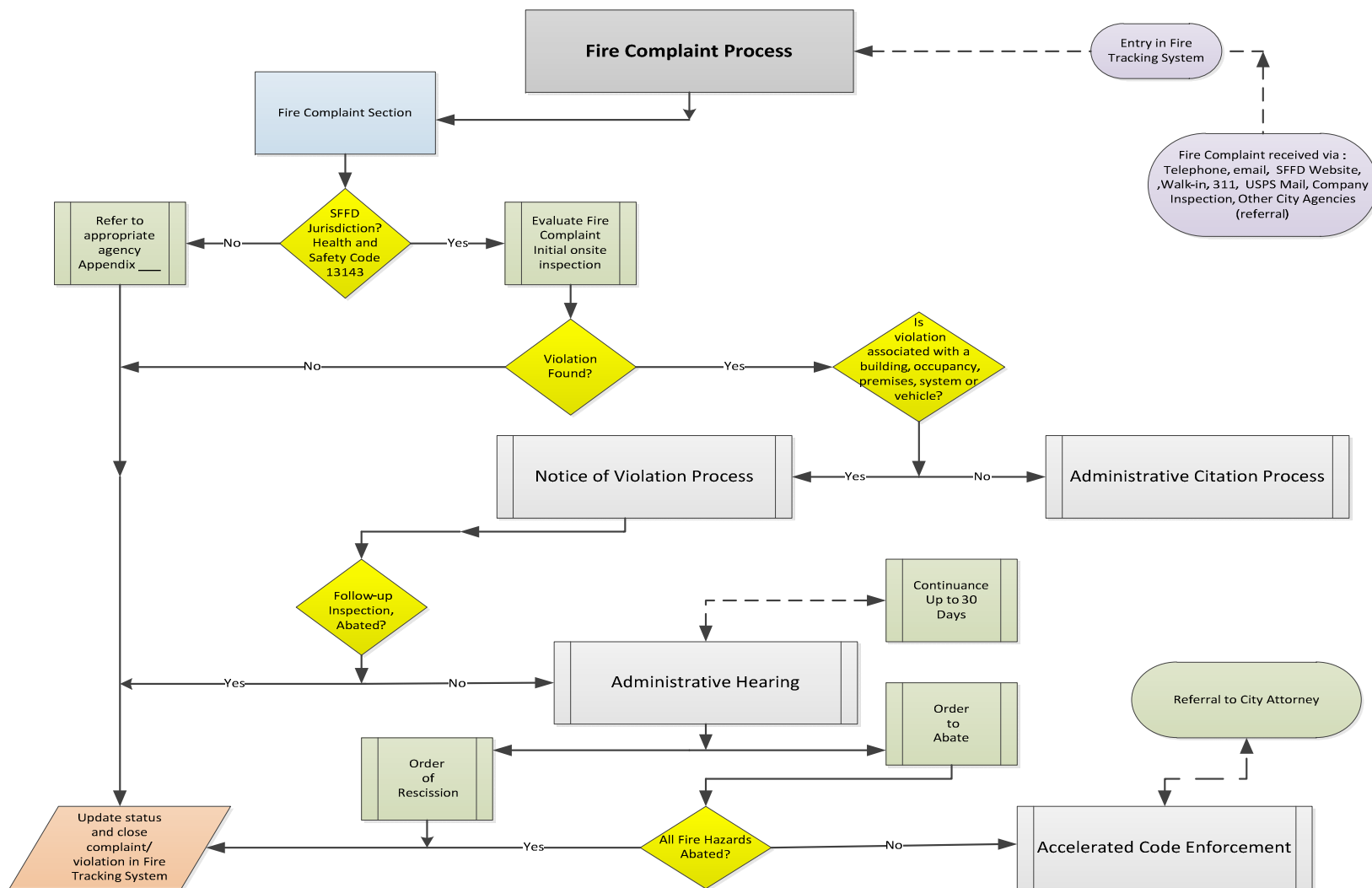
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2015-2016	Fire Safety Inspections in San Francisco	R.II.17. Battalion Chiefs should encourage their Company Captains to bring the Inspection Worksheet to the inspection site and use it to document R-2 inspections.	SFFD Deputy Chief of Operations	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	Battalion Chiefs' knowledge will be enhanced by a new training module being developed by the Fire Marshall. This will be implemented in January 2017.
2015-2016	Fire Safety Inspections in San Francisco	R.II.18. The Fire Marshall should finalize the details of the new code enforcement process that is required by recently passed legislation so that it can be implemented within the next 60 days.	The Fire Marshall	The recommendation has been implemented (summary of how it was implemented in next column)	The Fire Marshal has developed a detailed framework for the new code enforcement process. The framework outlines the end to end process of enforcement and includes deadlines for each associated step/phase of a fire complaint.
2015-2016	Fire Safety Inspections in San Francisco	R.II.19. The new BFP Captain that oversees R-2 Company complaints should refer appropriate cases to the CA every year.	The Fire Marshall	The recommendation has been implemented (summary of how it was implemented in next column)	Two documents demonstrate case referrals to CA every year: 1) I Code Enforcement Process; and 2) Complaint Process Flowchart. The Fire Complaints Section is managed by a Captain who serves as the Accelerated Code Enforcement officer. The Accelerated Code Enforcement (ACE) officer serves as liaison between the SFFD and the City Attorney's Office for issues regarding code enforcement and will refer cases to the City Attorney's Office as prescribed in I Code Enforcement Process.

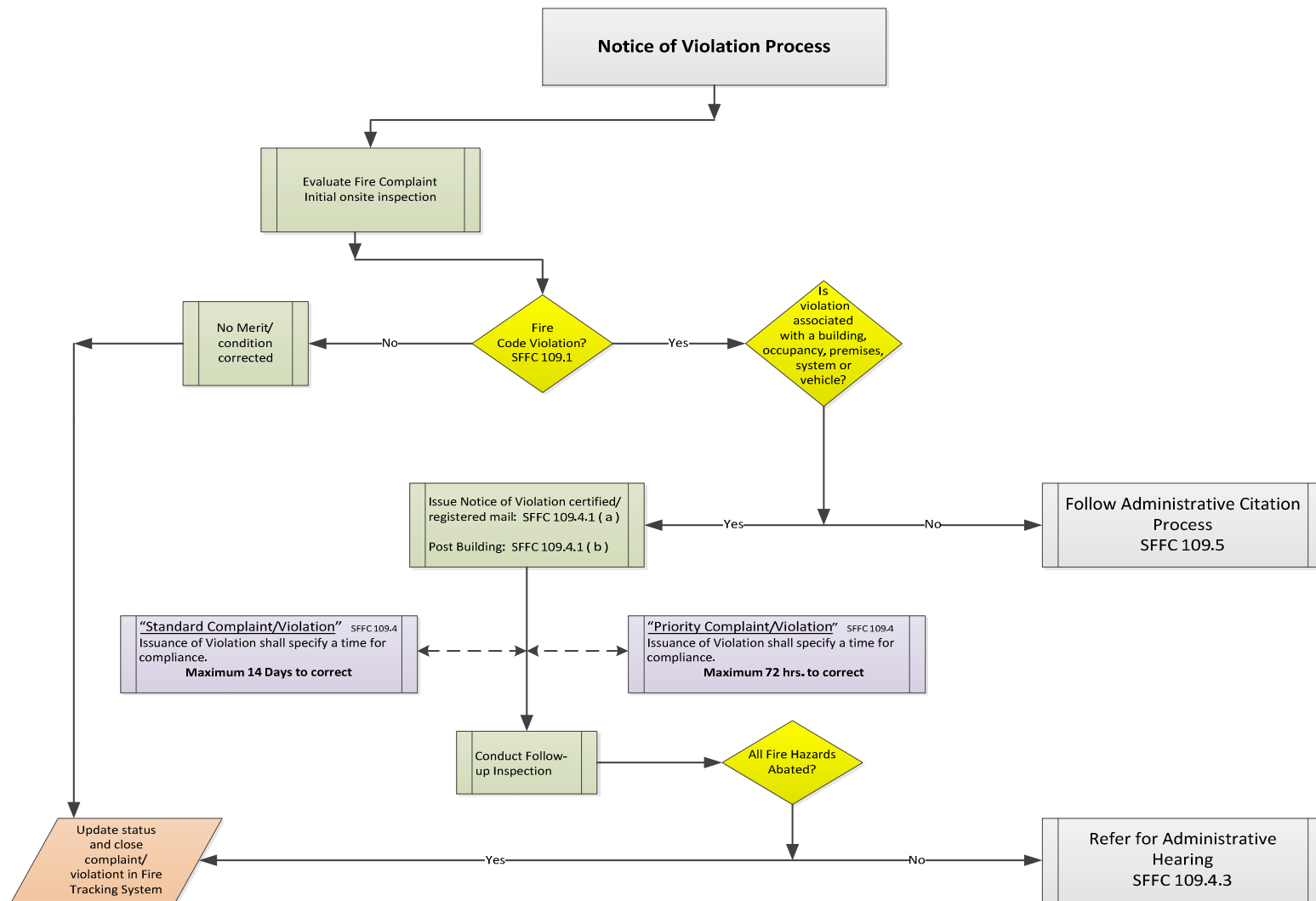
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2015-2016	Fire Safety Inspections in San Francisco	R.II.20. SFFD MIS should revise the SFFD website to include: (1) details of the R-2 inspection process, such as: (a) the kinds of buildings inspected; (b) who inspects the buildings; (c) how often R-2s are inspected; (d) the list of items inspected; and , (e) how the inspection will be conducted; and, (2) details of the code enforcement process, including: (a) what happens when a violation is discovered; (b) what happens if a violation goes uncorrected beyond the NOV deadline; and (c) any and all fees, fines, or penalties that may be imposed for uncorrected violations. This information should be either on the inspections page or Division of Fire Prevention and Investigation homepage.	SFFD Management Information Systems	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	Information about the annual inspection and code enforcement processes will be added to the SFFD website once the new R2 procedure has been adopted. These website improvements are anticipated to be available by March 2017 .
2015-2016	Fire Safety Inspections in San Francisco	R.11.21. The Chief of the Fire Department should instruct SFFD MIS to make inspection records available online for greater transparency.	Chief of SFFD	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	The Department is working with new technology to provide fire records for easy online access for the public. The first phase of this project should be completed in January 2017.
2015-2016	Fire Safety Inspections in San Francisco	R.11.22. SFFD MIS should put the BFP phone number for record inspection requests on the same SFFD webpage as the instructions for making an appointment.	SFFD Management Information Systems	The recommendation has not been, but will be, implemented in the future (timeframe for implementation noted in next column)	We will also add the correct number to this page by January 2017
2015-2016	Fire Safety Inspections in San Francisco	R.11.23. SFFD MIS should put the BFP phone number for reporting a safety concern on the same SFFD webpage as the instructions for reporting a safety concern.	SFFD Management Information Systems	The recommendation has been implemented (summary of how it was implemented in next column)	We will also add the correct number to this page by January 2017.

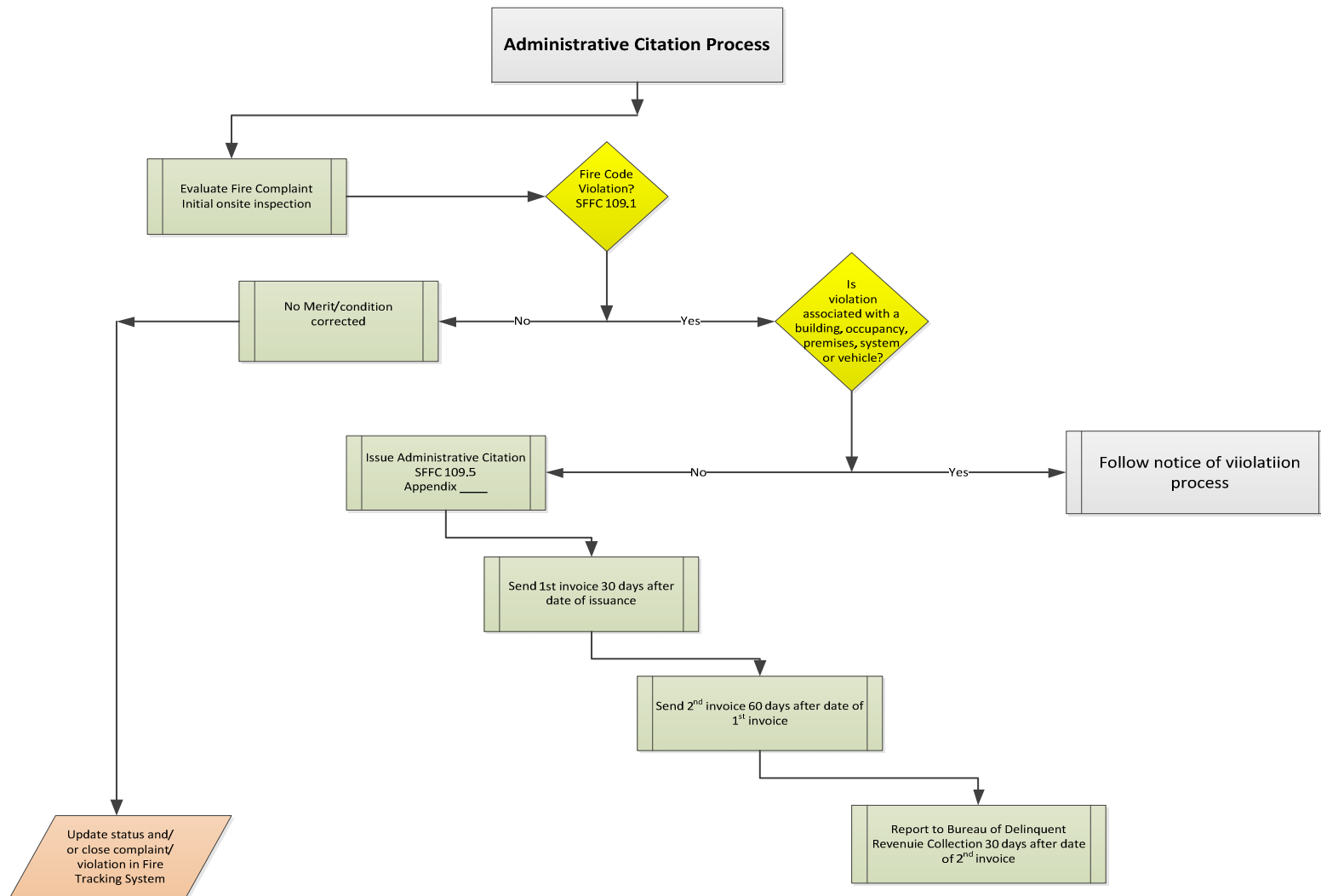
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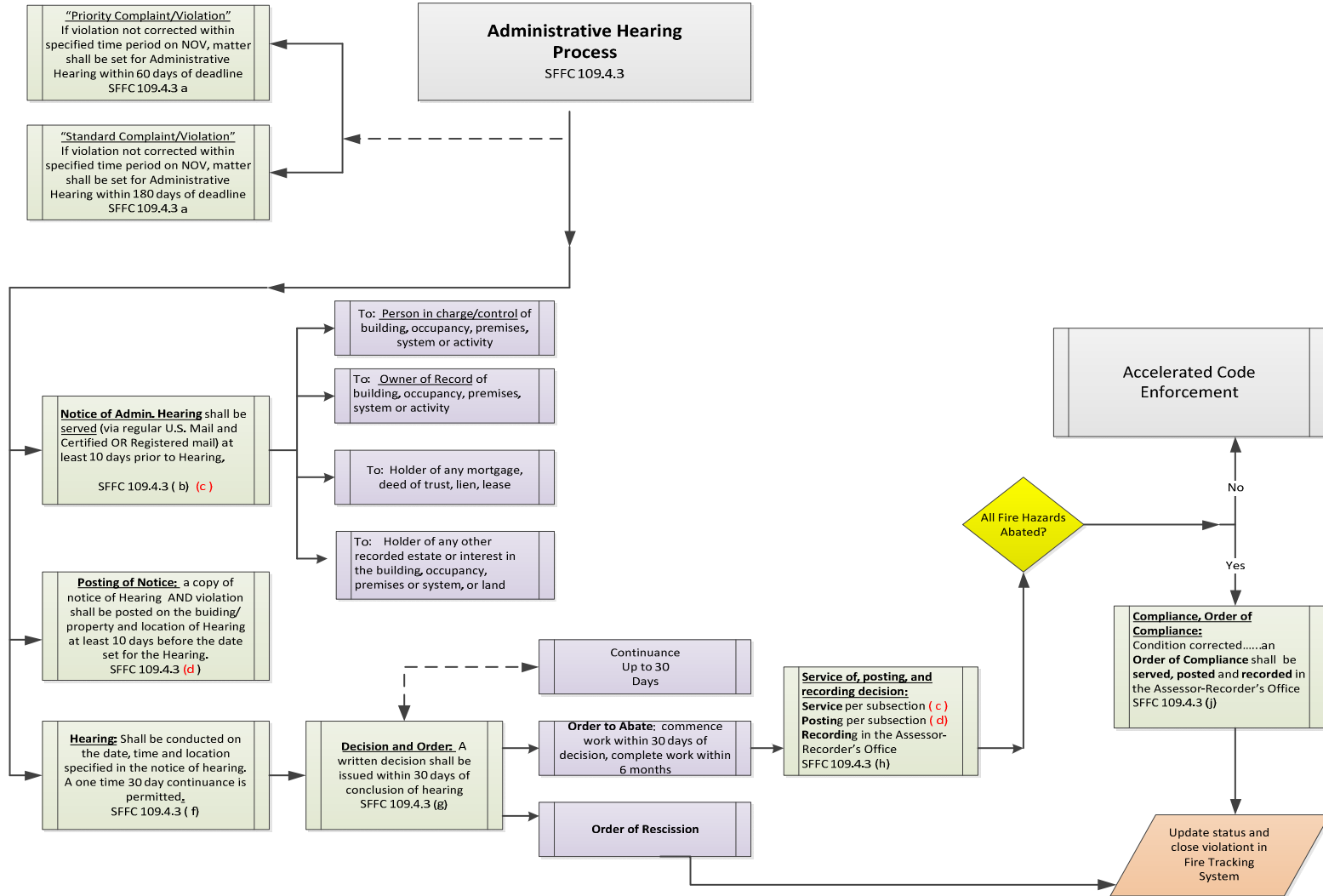
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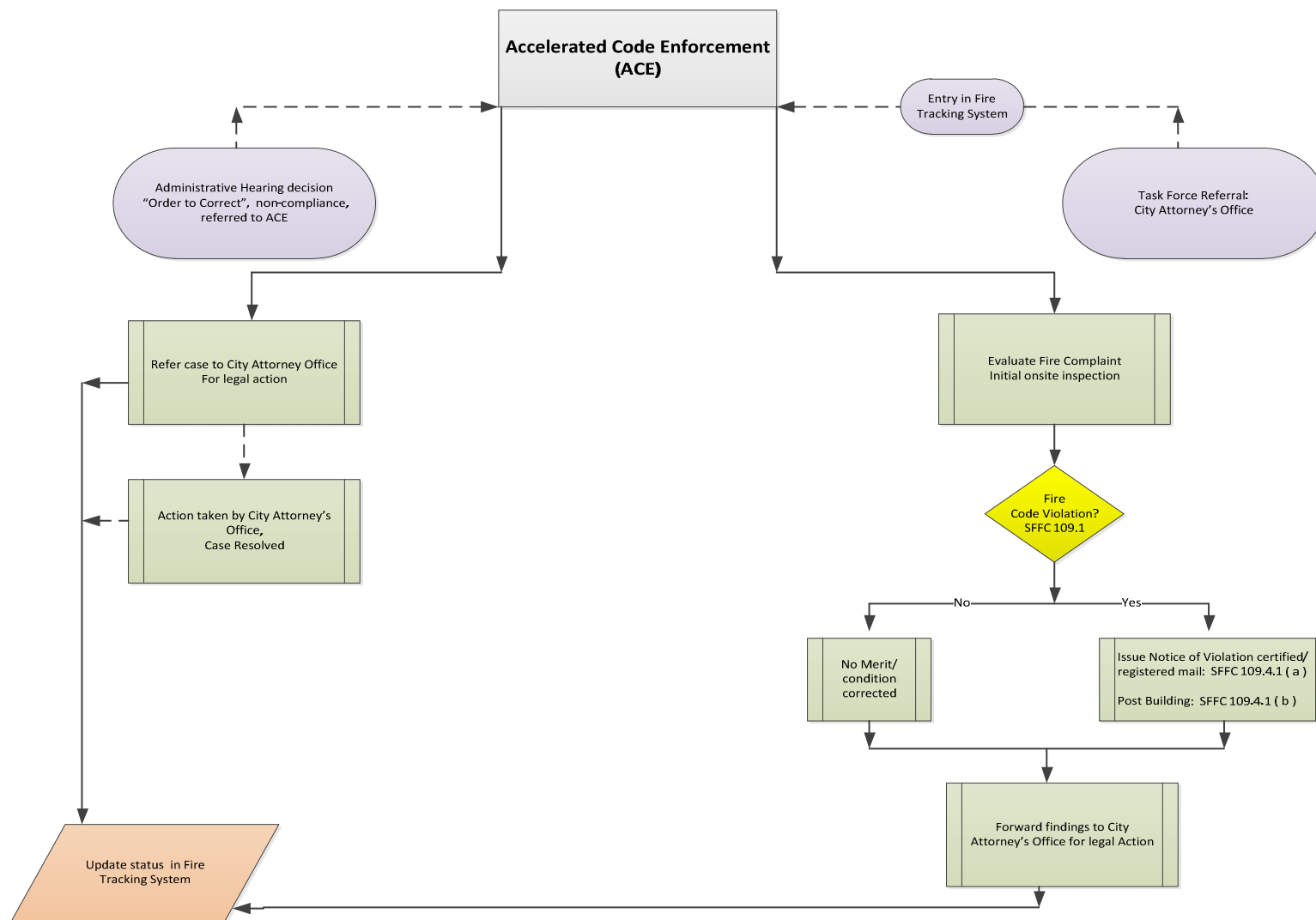
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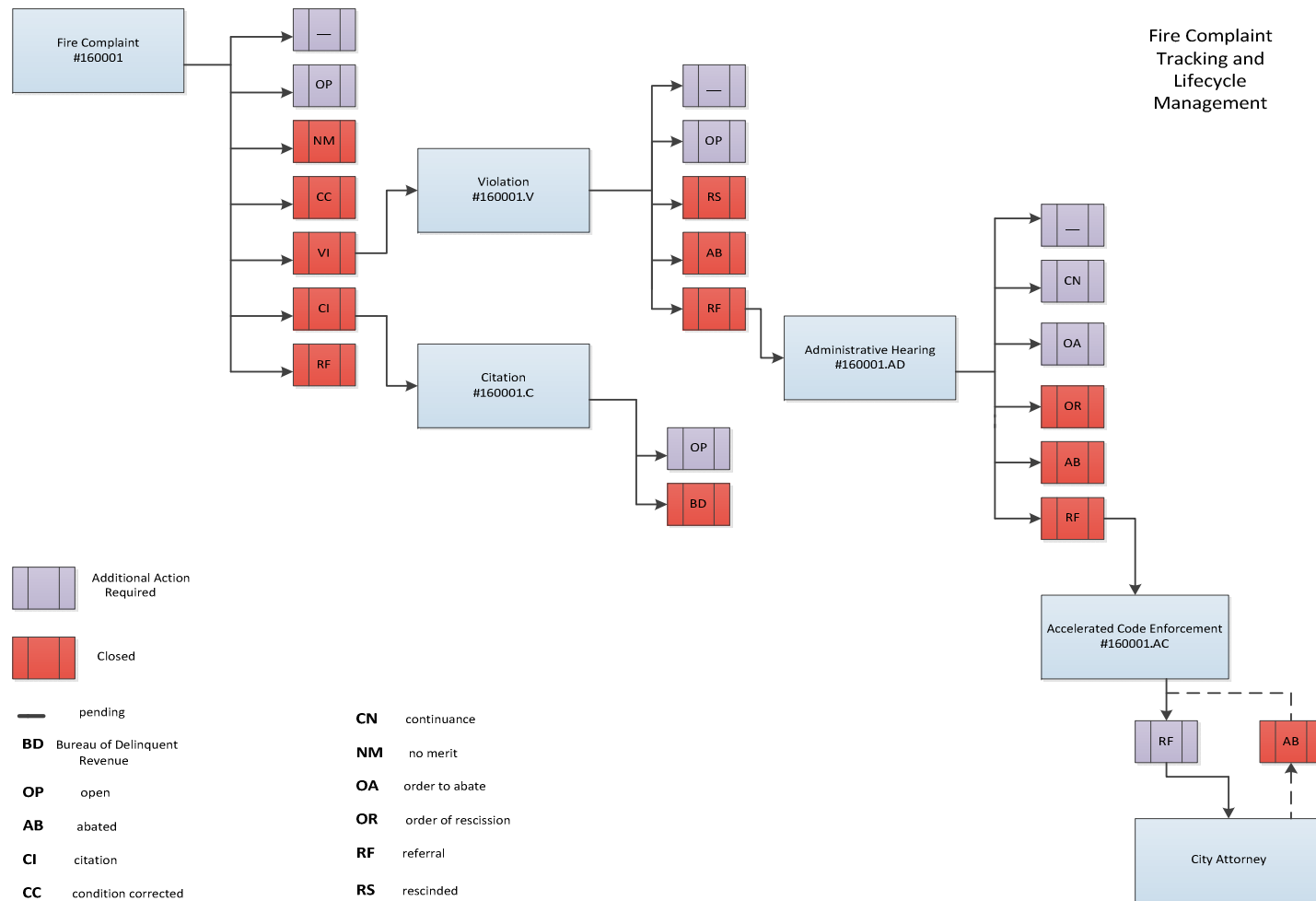
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