BEFORE THE PUBLIC UTILTIES COMMISSION
OF THE STATE OF CALIFORNIA

In the matter of Joint Application of Charter Communications, Inc: Charter Fiberlink CA-CCO, LLC (U6878C), Time-Warner Cable, Inc, Time-Warner Cable Information Services (California), LLC: (U6874C): Advance/Newhouse Partnership: Bright House Networks, LLC: and Bright House Networks Information Services (California), LLC (U6955C) Pursuant to California Public Utilities Code Section 854 for Expedited Approval for the Transfer of Control of both Time-Warner Cable Information Services (California), LLC (U6874C) and Bright House Networks Information Services (California), LLC (U6955C) to Charter Communications Inc. and for Expedited Approval of a Pro-FormaTransfer of Control of Charter FiberLink CA-CCO, LLC (U6878C)	)	A.15-07-009 (Filed July 2, 2015)

COMMENTS OF MEDIA ALLIANCE ON PROPOSED DECISION ISSUED APRIL 12, 2016

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I-INTRODUCTION

Media Alliance submits these comments into the Commission's public record in the service of our California membership of citizen and professional journalists and community-based activists who consume and create media and communication services extensively and have compelling interests in the outcome of this proceeding. We are informed by this main sentiment; that it is contingent upon the Commission to specifically identify concrete public benefits resulting from the proposed merger that clearly and convincingly outweigh any potential harms in order to authorize the Joint Applicants to move ahead with the proposed merger. In several respects, we are not convinced the Proposed Decision has done so.

II-THE PROPOSED DECISION DOES NOT PROVIDE ANY MITIGATING CONDITIONS FOR CHARTERS EXECRABLE COMPLIANCE RECORD ON DIVCA OBLIGATIONS FOR GOVERNMENTAL, EDUCATIONAL AND PUBLIC ACCESS (PEG) CHANNELS

One of Media Alliance's Executive Director Tracy Rosenberg's extra-curricular engagements is as a board member for the Alliance for Community Media, Western Region. ACM is the trade association for the public, educational and governmental access stations established via cable franchise agreements and funded by cable operators under DIVCA law. As a result of this engagement, Media Alliance receives information on an ongoing basis directly from access center operators about the local franchises in their areas.

As we stated earlier, Charter Cable has demonstrated a dismissive attitude towards public service obligations and has, at times, made extraordinary attempts to undermine legal regulations enforced by this Commission.

In Capitola and Grover Beach, CA, Charter refused to pay PEG support obligations required pursuant to DIVCA. Charter claimed PEG support obligations required under DIVCA requires voter approval under Proposition 26. Proposition 26 requires certain types of taxes and fees to go before the voters and be approved by a 2/3 majority in order to be implemented. There was no legal opinion or court ruling in

the State that supported the position of Charter while they defaulted for years on payments they were required to make under state law. Charter's request for opinion to the Office of The California Attorney General was decided on January 15, 2016 and predictably, rejected Charter's assertions regarding Proposition 26. (Decision 13-403)[1]

In another example of flouting established CA telecommunications law, in Long Beach, CA, Charter is charging the local public access organization to transmit their signal to the head end for cablecast to subscribers in Long Beach. Section 5970(h)-1of DIVCA indicates that the interconnection of PEG signals is the financial responsibility of the franchisee.

Outside of the State of California, in states as varied as Georgia, North Carolina, Wisconsin, South Carolina and Missouri, Charter "channel-slammed" PEG channels in 2013 and 2014, moving these public interest channels to remote locations and in some cases requiring cable subscribers to rent or purchase an additional piece of equipment in order to continue to receive the signals.

We bring this up in the context of the Proposed Decision for three reasons. Firstly, in the context of the 854(c) standards applied by the administrative law judge, these facts are pertinent to the measure of 854(c)-(6) which addresses how beneficial the proposed merger is to state and local economies and consumers. It does not seem at all controversial that governmental transparency, educational opportunities and the training and communication opportunities offered by public access centers are beneficial to state and local economies and consumers. That is the basis for the franchise fee-based funding offered for the services and why DIVCA is enshrined in state law. So it is disturbing to us that Charter's history of interference, disabling, and attempting to defund PEG is not evaluated in the context of 854(c)-(6) nor is a mitigation measure provided for these adverse public interest impacts. Media Alliance recommends that the Final Decision prohibit channel-slamming for public, educational and governmental (PEG) channels in California and that New Charter cease its previous violations and legal appeals regarding standing DIVCA (Digital Infrastructure and Video Competition Act of 2006) regulations and agree to abide by all standing DIVCA legislation regarding funding, equipment and carriage requirements.

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1 https://oag.ca.gov/system/files/opinions/pdfs/13-403.pdf?

Secondly, as with all Proposed Decisions on mergers, Media Alliance considers it material that the Commissioners fully consider previous compliance records when considering the efficacy of suggested conditions and realistically evaluate the Commission's ability to enforce the applied conditions. Unenforced conditions, in practical terms, do not address the adverse impacts they are designed to mitigate, so the Commission's calculus in deciding whether the Proposed Decision is adequate is a two-part question: a) What does the past history of the Joint Applicants indicate about the likelihood that applied conditions will be voluntarily complied with or whether enforcement action by the Commission will be necessary to achieve the desired ends? and b) What is the Commission's current capacity to enforce multiple conditions, are systems in place to do so, and what can be learned from previous examples of non-compliant behavior by the Joint Applicants and what the Commission did or did not do to mandate compliance?

Thirdly, we address these points in the context of the condition applied in the Proposed Decision to require component parts of New Charter to comply with the certification requirements outlined in Commission Decision (D.) 13-05-035[2] within 30 days of the transaction close date. While the condition applies to the New Charter "components" participating in the voice marketplace, Charter Fiberlink, Bright House Networks and TWCIS, there is no doubt that the merged entity is fundamentally the provider filling out the CPCN (Certificate of Public Convenience and Necessity). The Proposed Decision implies that the above New Charter components had previously failed to certify citing the certification as overly burdensome. Media Alliance will add, and there will be further discussion on this matter later in these comments, that without the above-mentioned chopping into component pieces, it is unlikely that New Charter could certify at all:

Neither applicant, any of its affiliates, officers, directors, partners, agents, or owners (directly or indirectly) of more than 10% of applicant, or anyone acting in a management capacity for applicant: (a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency; (e) had telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of sections 17000 et seq., 17200 et seq., or 17500 et seq. of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; or (g) **been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries**; or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general. To the best of applicant's knowledge, neither applicant, any affiliate, officer, director, partner, nor owner of more than 10% of applicant, or any person acting in such capacity whether or not formally appointed, is being or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

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2. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M066/K368/66368352.PDF

Based on the above, we would add to the administrative law judge's comment in the Proposed Decision that the Joint Applicants have failed to meet their burden of proof in Sections 854(c)-(4) and Sections 854(c)-(5), that similarly Media Alliance is not at all convinced the burden of proof has been established for Section 854(c)-(6) either.

III – SERVICE DEFICIENCIES ARE EXTREME AND THE "CONCRETE PLAN" IS NOT PROMISING

Section 3.1.3.2 of the Proposed Decision mandates New Charter to provide a a concrete plan for remedying the service deficiencies of their licensed subsidiaries as soon as possible following completion of the Transaction. The reasons for this condition of merger approval do not have to be re-stated here as numerous parties have pointed out objective sources for comparative customer service rankings and the administrative law judge has agreed that the evidence is compelling. Media Alliance would add, however, that New Charter's pride in the opacity of their billing statements runs contrary to the basic principles of universal service and consumer protections that the Commission is sworn to protect. We will cite the 2002 Bill of Rights for Phone Users[3]

> "Provide accurate and understandable bills that clearly label products, services, fees and the names of carriers providing the services, and provide prompt and fair redress for billing problems".

And Federal Title 47 §76.1619 Information on Subscriber Bills[4]

> "Effective July 1, 1993, bills must be clear, concise and understandable. Bills must be fully itemized, with itemizations including, but not limited to, basic and premium service charges and equipment charges. Bills will also clearly delineate all activity during the billing period, including optional charges, rebates and credits".

Having established that increased billing opacity to consumers is not a Commission goal, Media Alliance would ask for specifics as to what would constitute a "remedy" of the service deficiencies and what improvement metrics the concrete plan is intended to concretize as the Joint Applicants point to little but their pride in billing opacity, a point also brought up by fellow party Stop The Cap, in their Motion for Judicial Notice regarding billing notification of the January 2016 Public Participation Hearing in Los Angeles, which featured such opacity. In other words, the condition proposed in the Proposed Decision is without any specific measurements, goals, objectives or benchmarks, rendering its impact on affected consumers, even if complied with and enforced, completely unknowable. Media

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3 http://articles.latimes.com/2002/jun/07/business/fi-phone7
4 https://www.torranceca.gov/CableTV/Documents/fcc_cablecustomerservicerules.pdf

Alliance cannot consider a condition asking for a plan to be sufficient mitigation for the stated adverse public interest impact and would again state that the measured balance for Section 854(c)-(6) of the Public Utilities Code does not seem to have fully met the required burden of proof if adverse impacts on consumers from demonstrably poor customer service is to be mitigated by a plan to concretely address nothing in particular and concretely improve in no particular area by no particular standards to achieve no particular goals by no particular date. Since Media Alliance has not requested nor accessed the confidential data filed by the Joint Applicants, we would defer to our fellow parties in specifying the desired metrics, but in general terms we believe it is the Commission's responsibility to concretize the desired customer service outcomes in specific measured terms including annual reduction bench-marked percentages in filed complaints and service outages as well as maximum billing transparency and it is the Joint Applicants responsibility to indicate the steps they will take to meet the Commission's stated goals.

IV- HOME HOTSPOT SHARING IS A SECURITY RISK AND BEING LEGALLY CHALLENGED IN CALIFORNIA

Section 2.1.1.3 of the Proposed Decision describes a merger condition to deploy 25,000 new WiFi hot spots throughout California and 300,000 new out-of-home WiFi access points throughout the country within 4 years of closing the transaction. The Proposed Decision does not specify the parameters of these new hot spots. While generally supportive of increased Internet access, especially via anchor community institutions, Media Alliance remains cognizant of the statement by Joint Applicants in their opening testimony of their intent to offer the same kind of sharing of residential Internet connections as public hot spots as competitor Comcast does.

Media Alliance will reiterate here that these WiFi sharing programs can introduce significant risks to journalists dealing with sensitive materials or other kinds of vulnerable populations, especially when the instructions for opting out of them are difficult to access, complex or unclear, and when the programs exist on a default opt-out basis rather then the preferable affirmative opt-in option. Consumers assume, rightly or wrongly, that the Internet connections they pay for and protect with passwords, are not public WiFi hot spots available to those they do not willingly share them with, and the consistent actions of broadband providers to turn that assumption over on its head continues to turn many broadband consumers into unwitting public networks, and to potentially severely compromise

information security for some, often with little to no knowledge on their part. We continue to insist that it should not be the customer's burden to indicate they do not want to use their purchased Internet access connection as a public WiFi hot spot, it should be the broadband provider's burden to find out directly from the consumer if they are willing to provide public hot spot services – or not.

Media Alliance will add that at least two legal cases have been filed by consumers objecting to these practices by broadband providers, one which remains in current litigation on the East Coast[5], and one which was referred to arbitration[6].

Accordingly, in the context of the Proposed Decision, we believe it is incumbent on the Commission to a) Clarify if, and if so, how many of the proposed 25,000 new public WiFi hot spots in California will be established by the use of purchased residential Internet connections by California consumers b) Indicate what opt-in/opt-out provisions need to be in force to make sure informed consent is received from all consumers whose residential connections are so utilized, including those who may be bureaucracy-challenged, have limited English fluency or be otherwise challenged in decoding telecom-speak and c) if so, make provisions for alternative services to maintain public WiFi access should the case currently being litigated in New York's Eastern District Court significantly restrict the practice of using residential connections as public WiFi hot spots.

V-INTERNET SUBSIDIES MAY BE PROBLEMATIC FOR LOW-INCOME CALIFORNIA RESIDENTS LEFT OUT

Per the Joint Applicants settlement agreement with CETF as outlined in the Proposed Decision, New Charter's broadband subsidy program will provide 30 mps service at $14.99 a month to selected populations: families with school-age children enrolled in the subsidized lunch program and senior citizens collecting Supplemental Social Security Income (SSI). The settlement outlined in the Proposed Decision also grants $32.5 million over six years to CETF, presumably for redistribution to grantees to assist with signing people up for the broadband subsidy program.

Media Alliance would identify the constellation of senior citizens with income challenges, especially in

5 https://www.pacermonitor.com/public/case/8743797/Jensen_v_Cablevision_Systems_Corporation_et_al
6 http://www.leagle.com/decision/In%20FDCO%2020150304A90/Grear%20v.%20Comcast%20Corporation

the high cost of living metropolitan centers of Greater Los Angeles and San Diego, is not restricted only to Supplemental Social Security (SSI) recipients as seniors receiving standard social security income benefits (a demographic set to rapidly increase over the next few years due to population gradients), can also be living in poverty or close to poverty in incomes in the $1,000 to $1,300 a month range, which is less than the current rental cost of a one bedroom apartment in many California municipalities.

Federal reform of the Lifeline program to include broadband services mitigates some of the concerns about the large population untouched by commercial broadband subsidies, but the pending issue of a federal cap on the program's total annual funds outlay, makes it appropriate to point out the disconnect between the public benefit proposed and the extent of the needs in the State of California and to suggest that highly leveraged financial juggernauts like New Charter have the ability and the public interest obligation to do more than the minimum.

California's current Lifeline program, which will be expanded to include broadband subsidies in an upcoming rule making process, provides many more routes of access than SSI payments and the school lunch program, including Medicaid/Medi-Cal, LIHEAP, Section 8, WIF, TANF and Tribal Head Start.[7] Given H.R. 4884, as well as the unknowns about the forms California's Lifeline update will take when it expands coverage to include broadband access, it is not difficult to see that there may be future disconnects between the total population to be served and Lifeline capacity. In the Commission's capacity to mitigate adverse public interest impacts during mergers on the noncontroversial basis that increased market concentration in broadband almost always results in an increase in affordability challenges, (and as many parties have pointed out, the financial leveraging of New Charter indicates this merger will not be the sole exception to the rule), Media Alliance would like to suggest a condition that in the event of Lifeline broadband subsidy caps, on the state or federal level, that Californians eligible for the Lifeline program per the existing guidelines be granted eligibility waivers for the New Charter internet subsidy should be they be closed out of a Lifeline internet subsidy due to a cap, and reside in a New Charter service area. Such a condition, although based on hypothetical conditions whose final outcome cannot be known at this time, would meet the Commission's standard for guaranteeing affordable access to low-income Californians with more specificity than cash grants to

7 http://www.cpuc.ca.gov/lifeline/

serve a more limited population than that the Commission has already identified as the definition of California residents who benefit from and should receive subsidized telecommunications services and would thus be an effective mitigation of any decrease in affordability linked to the increase in high speed broadband market concentration caused by the proposed merger.

VI – THE COMMISSION SHOULD AFFIRM THE SEVEN YEAR REQUIREMENTS IN THE FEDERAL PROPOSED DECISION

The FCC's Media Relations Office issued the following statement regarding the Federal Communications Commission (FCC's) Proposed Decision on the proposed merger.[8]

> In conjunction with the Department of Justice, specific FCC conditions will focus on removing unfair barriers to video competition. First, New Charter will not be permitted to charge usage-based prices or impose data caps. Second, New Charter will be prohibited from charging interconnection fees, including to online video providers, which deliver large volumes of internet traffic to broadband customers. Additionally, the Department of Justice's settlement with Charter both outlaws video programming terms that could harm OVDs and protects OVDs from retaliation an outcome fully supported by the order I have circulated today. All three seven-year conditions will help consumers by benefiting OVD competition. The cumulative impact of these conditions will be to provide additional protection for new forms of video programming services offered over the Internet.

The Commission's Proposed Decision should certainly affirm the FCC findings regarding the seven-year duration of mitigating conditions focused on reducing adverse effects of lack of competition caused by increased market concentration as a result of the proposed merger. Media Alliance is gratified that the Federal Communications Commission recognized the implicit problem in the Joint Applicants opening offer of three-year compliance on some of these mitigations and request for a trust-us basis going forward on these anti-competitive practices and intends to apply a more substantive mitigation than that provided in the CPUC's Proposed Decision. Media Alliance would suggest that for the sake of the public record and in order to maintain a balanced measurement of the merger's impact on broadband competition and the emerging OVD market that the Commission adopt parallel conditions to that proposed by federal regulators whose assessment of future marketplace conditions appears to be more comprehensive. Media Alliance agrees that the broadband and cable marketplaces will not be magically transformed into hyper-competitive arenas where zero-rating, data caps and interconnection fees no longer have negative impacts on consumers and content creators.

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8 http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0425/DOC-339028A1.pdf

Nor did we see anything in the Joint Applicant's statements besides wishful thinking that demonstrated these significant changes will be in place by 2019.

Media Alliance trusts that we can rely on the extensive public record to document the negative public impacts of data caps, and interconnection fees on both consumers and content creators. They are wildly unpopular – and with good reason. In fact, the Joint Applicant's argument that the proposed merger should be approved was largely predicated on the argument that their business plan does not incentivize them to do these horrible and agreed-upon undesirable things because they would not gain any competitive advantage from doing so, given that consumers, customers and clients run away screaming when confronted with such things – if they have anywhere else to go.

Accordingly Media Alliance was truly puzzled by the Joint Applicant's unwillingness to commit from refraining from such undesirable anti-competitive behavior for only three years as a condition for the creation of New Charter and by their insistence that the Commission move to a trust-us basis by 2019. We are therefore pleased that the FCC proposes to act in a more market-responsive manner to anti-competitive practices and we encourage the Commission to affirm the federal mandate, rather than indicate disagreement.

VII-DEFINING MAINTAINING OR IMPROVING QUALITY OF MANAGEMENT PER PUBLIC UTILTIES CODE 854(C)-(3)

Finally, returning to the initial point made in this comment set, which addressed the condition applied in the Proposed Decision to require component parts of New Charter to comply with the CPCN certification requirements outlined in Commission Decision (D.) 13-05-035[9] within 30 days of the transaction close date. The Proposed Decision implies that the above New Charter components had previously failed to certify citing the certification as overly burdensome.

9. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M066/K368/66368352.PDF

It bears repeating that the failure to file required documents on the basis of "burdensomeness" bears witness to cavalier attitude towards regulatory requirements and does not bode well for ongoing compliance with the laundry list of proposed conditions in the Proposed Decision.

But it is also germane to address the conclusion of the administrative law judge that the burden of proof (i.e. affirmative public interest benefit) had been met on Public Utilities Code Section 854(C)-(3) which indicates the proposed merger should maintain or improve the quality of management of the merged entities (Charter Cable, Charter Fiberlink, Time-Warner Cable, Time Warner Information Services, Bright House Networks et. al.). The administrative law judge bases his assessment with regard to this section on forcing the Joint Applicants as a condition of merger approval, and only as modified herein, to overcome their previous burden and file the CPCN certification within 30 days of merger approval. It seems obvious that having to force the Joint Applicants more or less at merger approval gun point to file the Certificates of Public Convenience and Necessity (CPCN) does not indicate an improved management team.

New Charter, per the Wall Street Journal, will have approximately the following make-up:
Depending on how many shares are distributed as part of the deal, following the transaction:

> Under the deals announced Tuesday, Liberty will have total voting power of about 25% at closing, which includes Advance/Newhouse giving Liberty a voting proxy on its shares, capped at 7%. Time Warner Cable will own up to 44% of the new company, Liberty Broadband up to 20%, Advance/Newhouse up to 14% and Charter will own the rest[10]

While the math is convoluted with cable magnate John Malone at 46.6% shareholder ownership of Liberty, which looks to have approximately 25% of the voting power in the post-merger entity New Charter, it seems fairly clear that the 10% ownership standard described in CPUC regulatory paperwork is applicable. This introduces the germaneness of the certification's disclosures regarding past violations of utility codes, consumer protection regulations and settlements with regulatory agencies, which are substantive. For a few examples we will reference the 2009 $1.4 civil penalty paid to the Federal Trade Commission (FTC) for violations of the Hart-Scott-Rodino Anti-Trust Act,[11], the 2010

10http://www.wsj.com/articles/charter-to-merge-with-time-warner-in-55-billion-deal-143263577

11 https://www.ftc.gov/news-events/press-releases/2009/06/ftc-obtains-14-million-civil-penalty-premerger-filing-violations

forced $21.5 million dollar stock swap and resignation from the DirecTV board to satisfy a Federal Communications Commission conflict of interest investigation[12] and to the extent that the Commission pays any attention to the actions of international regulators, a 2008 lawsuit and 2012 $3.6 million dollar fine by the Chilean government regarding violations of regulatory conditions from a 2004 cable merger in the South American country[13].

Our reason for bringing this up is that Media Alliance cannot see any objective framework for concluding that a 12.5% stake in the former Time-Warner Cable (TWC)/Time-Warner Information Services (TWCIS) and Bright House Networks (BHN)/Bright House Networks Information Services (BHNIS) for the Al Gore-dubbed "Darth Vader of Cable"[14] maintains or improves the quality of management. And we see some objective support for the affirmative statement that it does the opposite, thus not meeting the burden of proof for Public Utilities Code 854(C)-(3), with or without the compelled filing of the burdensome Certificates of Public Convenience and Necessity (CPCN's) within 30 days of merger approval.

VIII - CONCLUSION

In conclusion, in addition to the administrative law judge's statement that the burden of proof for affirmative public interest benefit for Public Utilities Code sections 854(C)-(4) and 854(C)-(5) had not been satisfied by the Joint Applicants, Media Alliance would add that we do not believe that is the case for Sections 854(C)-(3) or 854(C)-(6) either, leaving a fairly small number of sections remaining. While we understand that both the Federal and State processes indicate that this proposed merger is likely to go forward regardless, in addition to providing some suggestions for where proposed mitigations can and should be significantly strengthened prior to any Commission approval, we want to take this opportunity to stress that the Commission should and is in fact obligated to, take into account the wretched state of competition in the telecommunications and high speed broadband marketplaces in the state, whether or not Joint Applicants can be held solely responsible for them, and to use the correct bar when evaluating both this proposed merger and others that will come before the Commission. The standard is not, as we believe may have been the case here, whether the proposed merger rises to the

12 http://www.bizjournals.com/denver/stories/2010/06/14/daily41.html
13 http://www.bizjournals.com/denver/blog/boosters_bits/2012/01/john-malone-fined-36m-for-dual-tv.html
14 https://www.washingtonpost.com/business/economy/the-darth-vader-of-telecom-is-back/2015/05/26/9c08ac84-03b8-11e5-bc72-f3e16bf50bb6_story.html

level of catastrophic destructiveness of other proposed mergers or is merely somewhat “less bad”. The standard is that a proposed merger improves the marketplace and provides substantively improved services to the residents of the State of California than the pre-merger marketplace did.

Media Alliance thanks the Commission for the opportunity to respond to the Proposed Decision and to convey the concerns of our membership and constituency about media concentration in California and across the country. We believe strongly that the default position for regulators considering mergers is whether in a highly concentrated marketplace that consumers and content creators inform us is already deeply difficult for them to navigate and offers services they often find inadequate, expensive and frustrating, any particular merger proposal serves to substantively improve access, affordability, and availability. In our opinion, despite the best efforts of the Joint Applicants, sufficient evidence was not presented supporting such a conclusion and the number of mitigating conditions applied, which is likely to grow, point to the substantive adverse public interest impacts. When the public interest bar has not been affirmatively and uncontroversially met, which is the case in this proceeding, the general observation that increased marketplace concentration has made things worse and not better, should guide Commission decision making.

Respectfully submitted,

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