



California's Great America

October 15, 2012

Children's Fairyland

State of California

Disneyland Parks
and Resorts

State and Consumer Services Agency
California Building Standards Commission

Funderland

2525 Natomos Park Drive, Ste. 130
Sacramento, CA 95833

Gilroy Gardens Theme Park

Golfland Entertainment
Centers

**Re: Proposed Adoption of the 2010 ADA Standards for Accessible Design
Regarding Recreation Facilities into the 2013 California Building Code
(California Code of Regulations, Title 24, Part 2)**

Knott's Berry Farm

LEGOLAND California

Pacific Park

Dear Commission Members:

Palace Entertainment

Pixieland Amusement Park

Redwood Valley Railway

Santa Cruz Beach
Boardwalk

SeaWorld Parks
and Entertainment

Six Flags Discovery
Kingdom

Six Flags Magic Mountain

Sonoma Train Town

The Wave Water Park

Universal Parks and Resorts

Water World California

Wild Rivers Water Park

This letter is submitted as the formal public comment of the California Attractions and Parks Association (CAPA) regarding the proposal by the Division of the State Architect (DSA) to incorporate the 2010 Americans with Disabilities Act Standards for Accessible Design (hereinafter "2010 ADA Standards") into Chapter 11B of the California Building Code (CBC), codified as California Code of Regulations, Title 24, Part 2. For the 2013 version of the CBC, DSA is updating the accessibility provisions in Chapter 11B of the CBC in light of the U.S. Department of Justice's (DOJ's) issuance of the 2010 ADA Standards, which took effect on March 15, 2012.¹ CAPA understands that one impetus for this update is to enable the state code to become certified by the DOJ as ADA-equivalent. State law requires that DSA's regulations and building standards prescribe a degree of accessibility no less than the federal ADA Standards, that the building standards for access in commercial occupancies be consistent with the federal ADA Standards, and that the CBC be submitted to the DOJ for certification as establishing requirements equivalent to those in the federal ADA Standards.²

*Partial list

¹ 28 C.F.R. §§ 35.151(c), 36.304(d).

² Cal. Gov't Code, § 4450(c)-(d).

Specifically, DSA is proposing to modify Chapter 11B so that it will meet the minimum requirements of the 2010 ADA Standards. In so doing, CAPA understands that DSA proposes essentially to adopt the 2010 ADA Standards, including its formatting, while also maintaining those provisions in Chapter 11B of the 2010 CBC that are "more stringent," *i.e.*, provide for a greater degree of accessibility, than the 2010 ADA Standards. CAPA understands that this approach stems from DSA's decision that this would be the best way to achieve certification by the DOJ. Chapter 11B of the 2010 CBC presently contains no specific provisions regarding those recreation facilities addressed in Chapter 10 of the 2010 ADA Standards, including elements such as amusement rides, pools (except for swimming pool lift devices), miniature golf courses, *etc.* CAPA understands that DSA consequently is proposing to adopt Chapter 10 of the 2010 ADA Standards (and the corresponding scoping provisions in Chapter 2) without substantive change.

DSA's proposed modifications to Chapter 11B are of substantial interest to CAPA and its membership. CAPA is a trade association representing the theme, amusement and water park industry of California. Our members include virtually every park in California, from world-renowned destination resorts to small, family-owned parks throughout the state. CAPA members produce more than \$12 billion in state commerce each year and directly employ more than 125,000 workers. Our parks provide the economic foundation for communities statewide and are a vital element of the state's \$89 billion tourism industry, the largest industry sector in California.

CAPA and its membership are dedicated to providing access for all, including our workers and patrons. Several of CAPA's members participated in the lengthy federal regulatory process to establish accessibility requirements for recreation facilities. From the U.S. Architectural and Transportation Barriers Compliance Board's (also known as the "U.S. Access Board") initial creation in June 1993 of an advisory committee to formulate accessibility guidelines for recreation facilities through the DOJ's ultimate adoption of the 2010 ADA Standards in September 2010, members of CAPA participated in the federal regulatory process. Accordingly, CAPA appreciates the opportunity to provide public comment regarding DSA's proposed amendments to Chapter 11B of the CBC.

CAPA supports DSA's proposal to adopt those provisions in the 2010 ADA Standards pertaining to recreation facilities without substantive change. **As discussed further below, the 2010 ADA Standards pertaining to recreation facilities were the product of many years of extensive review, study and negotiation in which numerous stakeholders representing the interests of both individuals with disabilities and the recreation industry participated.** Accordingly, the 2010 ADA Standards constitute an extensively vetted set of accessibility standards that provide accessibility for individuals with disabilities, while also recognizing the very unique and difficult challenges associated with doing so for recreation facilities.

For these reasons, CAPA and its membership are greatly concerned about certain public comments made at DSA's Access Code Update Stakeholder Forum No. 5, which was held on June 21, 2012, as well as any similar written comments DSA may have received from stakeholders. At the stakeholder forum, two members of the public recommended that

exceptions contained in Section 234 of the 2010 ADA Standards (proposed section 11B-234 of the CBC) for certain types of amusement ride vehicles be eliminated. Additionally, similar recommendations were made with respect to exceptions in Sections 239 and 1007 of the 2010 ADA Standards (proposed sections 11B-239 and 11B-1007 of the CBC) regarding miniature golf facilities. Any such changes would disrupt the careful balance achieved in the 2010 ADA Standards pertaining to recreation facilities, which as already noted, were the product of extensive review and negotiation by interested stakeholders. Elimination or modification of these exceptions, as urged by these public commenters, should not be undertaken lightly. **Indeed, given the rigorous and extensive review and negotiation that have already occurred on these issues at the federal level, CAPA respectfully submits that no change to the 2010 ADA Standards is warranted.** As discussed below, extensive time and financial resources were invested in development of the federal standards. To date, DSA has not undertaken any similar review or study, and CAPA respectfully submits that "redoing" the study and review already completed on the federal level would not be a prudent use of the State's limited resources.

History of the 2010 ADA Standards for Recreation Facilities

The federal 2010 ADA Standards regarding recreation facilities stemmed from a lengthy and comprehensive review process. In June 1993, the U.S. Access Board created the Recreation Access Advisory Committee for the purpose of making recommendations regarding accessibility guidelines for recreation facilities.³ The committee consisted of 27 members representing various stakeholders, including individuals with disabilities, owners and operators of recreation facilities, manufacturers of the devices and products used in recreation facilities, public agencies and designers. These members included representatives from several prominent groups representing the interests of individuals with disabilities, such as the Paralyzed Veterans of America, Self Help for Hard of Hearing People, Disabled American Veterans, the National Council on Independent Living, and the State of Hawaii Commission on Persons with Disabilities.⁴ The Committee's members also represented many professional disciplines, including architecture, law, engineering, manufacturing and construction.⁵ Representatives of several of CAPA's member companies were appointed to the U.S. Access Board's Recreation Access Advisory Committee.

The U.S. Access Board's Recreation Access Advisory Committee was tasked with developing initial proposals for accessibility guidelines to address many forms of recreation, including, but not limited to, amusement rides, water park pools and aquatic attractions, golf and miniature golf facilities, play areas and boating facilities. Many of these features are provided in

³ U.S. Access Board, "Recreation Facilities Guidelines: Background," <http://www.access-board.gov/recreation/status.htm> (last visited Aug. 14, 2012) (hereinafter "Recreation Facilities Guidelines: Background").

⁴ Recreation Access Advisory Committee, *Recommendations for Accessibility Guidelines: Recreational Facilities and Outdoor Developed Areas*, at iii (July 1994) (hereinafter "Recreation Access Advisory Committee Report").

⁵ *Id.*

CAPA members' amusement parks, water parks and family entertainment centers. The Recreation Access Advisory Committee and its various subcommittees held numerous public meetings that were heavily attended by others not on the committee, including individuals with disabilities. The Committee reported that more than 250 individuals who were not on the Committee worked actively with one or more of its subcommittees, attended meetings and provided comment and information that the Committee considered in fashioning its recommendations.⁶ The Committee submitted its final report regarding its recommendations to the U.S. Access Board in July 1994.⁷ Collectively, the Committee estimated that its review and formulation of its final recommended guidelines involved between 50,000 and 60,000 person-hours of work.⁸

After the Committee's submission of its final report, the U.S. Access Board initiated its formal rulemaking to establish accessibility guidelines for recreation facilities. Throughout the Access Board's process, the public and interested stakeholders were provided with numerous opportunities to provide comment and input. The Access Board first published an Advance Notice of Proposed Rulemaking (ANPRM) for public comment in September 1994,⁹ and held an information meeting on miniature golf facilities in September 1996.¹⁰ After review and study of the information provided in response to the ANPRM, the Access Board then published its Notice of Proposed Rulemaking (NPRM) in July 1999.¹¹ The Access Board allowed for six months of public comment and also conducted two public hearings on the NPRM.¹² In July of 2000, the Access Board published a summary of its proposed changes to the guidelines for public comment¹³ and scheduled informational meetings to solicit further public input on the guidelines – one of which was held in San Francisco, California.¹⁴ The Access Board published its final guidelines for recreation facilities on September 3, 2002,¹⁵ and incorporated them into its final ADA/ABA Accessibility Guidelines issued on July 23, 2004¹⁶ (hereinafter "2004 ADAAG"). This process provided ample opportunity for comment by interested stakeholders, including stakeholders located in California.

⁶ *Id.* at v.

⁷ Recreation Facilities Guidelines: Background, *supra* n.3.

⁸ *Recreation Access Advisory Committee Report*, at iv.

⁹ 59 Fed. Reg. 48,542 (Sept. 21, 1994).

¹⁰ Recreation Facilities Guidelines: Background, *supra* n.3.

¹¹ 64 Fed. Reg. 37,326 (July 9, 1999).

¹² Recreation Facilities Guidelines: Background, *supra* n.3.

¹³ 65 Fed. Reg. 45,331 (July 21, 2000).

¹⁴ Recreation Facilities Guidelines: Background, *supra* n.3.

¹⁵ 67 Fed. Reg. 56,352 (Sept. 3, 2002).

¹⁶ 69 Fed. Reg. 44,084 (July 23, 2004).

CAPA members participated throughout this lengthy regulatory process before the Access Board. The International Association of Amusement Parks and Attractions (IAAPA), to which many of CAPA's members also belong, led the industry's effort to assist the Access Board in developing and finalizing the federal accessibility guidelines for recreation facilities. IAAPA created a task force to work with the Access Board throughout the regulatory process, and this task force included many CAPA members. Significantly, in addition to providing comment and information throughout the various stages of the rulemaking, **the task force also enabled the Access Board to visit certain members' parks in order to view the numerous and varied types of devices present, the unique and complex access issues presented at such devices, and the industry's approach to providing access to these devices.**

After the U.S. Access Board completed its rulemaking process, the U.S. Department of Justice (DOJ) then initiated its own formal rulemaking process to adopt the 2004 ADAAG, including the provisions respecting recreation facilities, as legally enforceable standards. On September 30, 2004, the DOJ issued an ANPRM soliciting public comment on the Access Board's 2004 ADAAG and requesting information to assist the DOJ in preparing a regulatory impact analysis.¹⁷ The DOJ thereafter issued its NPRM for public comment on June 17, 2008.¹⁸ The DOJ's final standards, the 2010 ADA Standards, were issued on September 15, 2010.¹⁹ Again, IAAPA and CAPA members participated in the DOJ's regulatory process.

The 2010 ADA Standards Establish Appropriate and Balanced Accessibility Requirements

Throughout the lengthy federal regulatory process, IAAPA and CAPA members worked not only with the Access Board and the DOJ, but also with many national and local disability organizations to develop a balanced accessibility standard that could withstand the rigors of the federal rulemaking process. Educating federal regulators and disability advocates as to the design and engineering challenges presented in providing access to recreation facilities was a critical function. The 2010 ADA Standards satisfy the objective of providing individuals with disabilities equal access to recreation facilities, while also recognizing the complex and unique challenges that recreation facilities present. **Quite simply, recreation facilities are not buildings.** For example, devices such as amusement rides present many design/engineering challenges not present with respect to buildings. Amusement rides are in motion, typically utilize cars/devices with very limited space that must operate throughout a fixed system in a coordinated manner, and also present issues with respect to passenger restraint and safety. They also present more complicated challenges in terms of alteration and barrier removal than do buildings. For example, certain amusement rides require individuals to remain in a standing position and rely on centrifugal force to maintain the rider in that position. Consequently, the basic standards developed in the context of buildings, and the same rationales for altering or

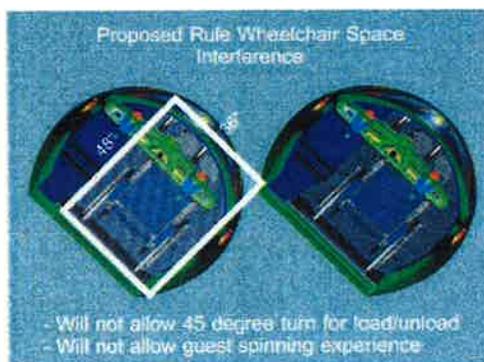
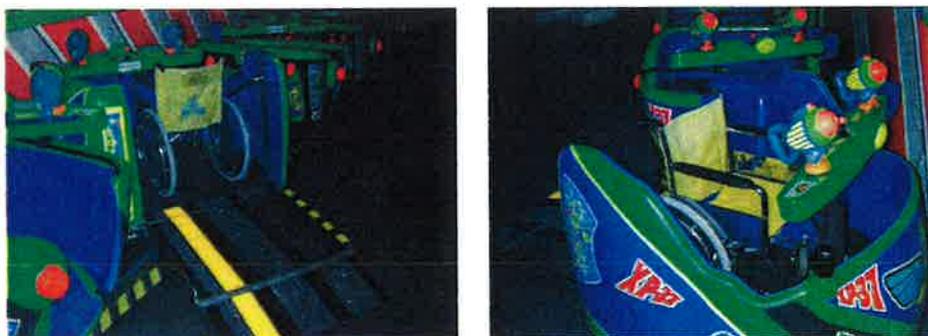
¹⁷ 69 Fed. Reg. 58,768 (Sept. 30, 1994).

¹⁸ 73 Fed. Reg. 34,466, 34,508 (June 17, 2008).

¹⁹ 75 Fed. Reg. 56,164, 56,236 (Sept. 15, 2010).

expanding accessibility requirements, often cannot simply be applied to recreation facilities. Rather, the application and development of accessibility standards for recreation facilities must necessarily entail an understanding of the unique design and engineering issues presented by recreation facilities.

For example, for certain amusement devices, the vehicles not only travel throughout a fixed system, but they also rotate or spin as part of the ride experience. Consequently, any access solutions must similarly accommodate such demands. The 2010 ADA Standards recognize this necessity. For example, while the Access Board's initially proposed rule specified that a wheelchair space be a minimum of 36 inches wide and 48 inches deep, the final 2010 ADA Standards permits the space to be 30 inches wide by 48 inches deep.²⁰ As illustrated below, the initially proposed rule would have interfered with the ability to maintain spinning and rotating action for certain types of amusement rides. The final standard in no way diminishes accessibility, and preserves the full range of experience for the accessible ride vehicle and the ability to provide companion seating.



Flexibility and creativity take on increased or heightened importance in providing access solutions for recreation facilities, and amusement rides in particular. Given the many unique and complex design issues presented by recreation facilities, flexibility in the manner in which access is achieved is critical. For example, below is an innovative and proven solution for providing

²⁰ Compare 64 Fed. Reg. at 37,349 (proposed §§ 15.1.3.2, 15.1.3.3), with 2010 ADA Standards, § 1002.4.4.1.

access on an amusement device. A rotating turntable is used to provide proper positioning for the wheelchair location, as opposed to providing the minimum maneuvering and turning space that otherwise would be required in the building environment. Exception 2 to Section 1002.4.4 of the 2010 ADA Standards (proposed section 11B-1002.4.4), therefore permits wheelchair spaces to be mechanically or manually repositioned, which is similar to a corresponding provision in the accessibility standards for transportation vehicles.

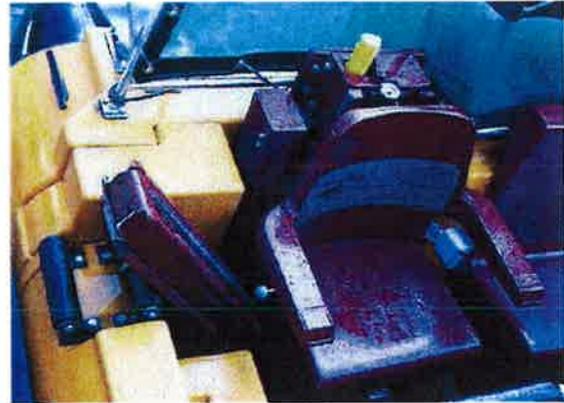


The 2010 ADA Standards acknowledge and accommodate the practical difficulties in providing access to recreation facilities, without sacrificing the provision of access to such facilities. Throughout the nearly two-decade federal regulatory process, members of IAAPA and CAPA worked to develop access solutions for the industry. They experimented, tested and implemented access solutions in advance of the completion of the federal regulatory process. Indeed, part of their contribution to the federal regulatory process was to educate regulators with respect to proven solutions for providing access, so that the federal accessibility standards could be framed in such a way to permit the continued use of these proven solutions.

For example, the 2010 ADA Standards permit alternate approaches to providing access to amusement rides. In lieu of providing a wheelchair space in the vehicle itself, provision of a seat designed for transfer or provision of a transfer device are allowed. 2010 ADA Standards, § 234.4 (proposed section 11B-234.4). Illustrations of such alternate approaches are provided below.



The pictures below depict a sophisticated transfer device. An individual transfers from a mobility device to the ride seat in the loading/unloading area. The seat then travels up a complex cam and lowers into the ride vehicle.



Adoption of the 2010 ADA Standards for Recreation Facilities without Substantive Change Will Satisfy California's Mandate for Providing Access.

CAPA and its members are concerned that selective deletions of exceptions or other provisions from the 2010 ADA Standards will jeopardize the careful balancing act that went into the formulation of those standards, and potentially compromise the flexibility necessary to provide access for the continually-evolving types of devices utilized in our members' facilities. Except for conventional facility elements common to many other types of facilities, such as entries, gates, queue lines, and signage, **Chapter 11B of the 2010 CBC currently does not contain any provisions specifically addressing the special features of recreation facilities, such as permanent amusement rides, pools (except for swimming pool lift devices), water slides or miniature golf courses. Consequently, there are no scoping or technical criteria in the 2010 CBC that currently create a greater level of accessibility for recreation elements than the 2010 ADA Standards.** Because DSA's stated intent is to merge the 2010 ADA Standards into the 2013 CBC by retaining "the most stringent provisions" between those standards and the current Chapter 11B, adopting Chapter 10 of the 2010 ADA Standards and its corresponding scoping provisions without substantive change satisfies this regulatory objective.

Based on the public announcements regarding the proposed amendments to Chapter 11B, several of CAPA's members understood that DSA's process to update Chapter 11B for the 2013 CBC essentially was a process to merge the 2010 ADA Standards into the CBC to facilitate certification by the DOJ, and not a forum to make modifications to the 2010 ADA Standards beyond those necessary to retain provisions in the existing Chapter 11B that currently exceed requirements in the 2010 ADA Standards. Thus, the current process is largely ministerial in nature; an attempt to compare the two different standards, and retain the more stringent provisions of each. Despite this limited nature of the amendment process, significant substantive changes were requested at the Stakeholder Forum No. 5 on June 21, 2012, by certain individuals. Given the described objective of the current process to amend Chapter 11B, CAPA and its

members believe that as a matter of regulatory procedure, it is inappropriate to contemplate substantive changes to the 2010 ADA Standards beyond those necessary to harmonize those standards with existing, more stringent requirements currently in Chapter 11B, particularly through a process that does not inform and engage all stakeholders with respect to such substantive changes. Meaningful dialogue regarding access to recreation facilities cannot be had without education regarding the unique and complex access issues presented by recreation facilities, and an understanding of the rationale behind the manner in which the 2010 ADA Standards regarding recreation facilities were framed.

Notwithstanding this procedural issue, the 2010 ADA Standards regarding recreation facilities should be adopted without substantive change because doing so best achieves the State's stated objectives of providing access to such elements and achieving DOJ certification, while also preserving the careful balancing of stakeholder concerns that went into promulgation of the 2010 ADA Standards. **Given the extensive review, study and negotiation that went into the 2010 ADA Standards regarding recreation facilities, any substantive modification of these standards should not be contemplated without an equally comprehensive and thorough review and study of these issues.** Indeed, failure to engage in such a process before making substantive changes would render such changes vulnerable to legal challenge that the changes are arbitrary and capricious. Accordingly, DSA essentially faces an "all or nothing" choice – adopting the 2010 ADA Standards regarding recreation facilities without substantive change or taking no action with regard to the provisions regarding recreation facilities until such time as the Sate can complete its own review and study of these issues, so that the full ramifications of the various proposals to eliminate or modify certain exceptions can be understood and debated by affected stakeholders.

The Exceptions in the 2010 ADA Standards Are Critical to the Success of the Standards.

The selective deletions proposed by public commenters, namely the elimination of certain exceptions set forth in the 2010 ADA Standards, also are problematic in that such commenters do not acknowledge or comprehend the rationale for those exceptions, and that selective deletion would disrupt the overall balance achieved in the 2010 ADA Standards. The extensive effort that went into the development of the federal accessibility standards for such specialized features, and the expertise needed to develop such standards, has been implicitly acknowledged. IAAPA is a member of the International Code Council's ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities standards group. Additionally, many of its members also are involved in the current efforts to update the International Building Code (IBC) to reflect the 2010 ADA Standards regarding recreation facilities. This process is moving forward in a swift manner, and without efforts to modify the scoping and technical criteria pertaining to amusement rides, water slides, swimming and water park pools or miniature golf facilities. Indeed, much the same way that these model code processes largely harmonized their provisions regarding conventional building elements with those in the 2004 ADAAG, in expanding to address recreation facilities, they are similarly attempting to harmonize with the federal requirements – rather than attempting to reinvent the wheel.

Particularly problematic is that the public commenters do not appear to acknowledge or comprehend the rationale for the exceptions they seek to have eliminated. Certain exceptions are warranted because of the manner in which those devices are used. For example, Exception 2 to Section 234.4 of the 2010 ADA Standards (proposed section 11B-234.4) provides that amusement rides designed primarily for children (*i.e.*, "kiddie rides"), *where children are assisted on and off the ride by an adult*, are not required to provide either a wheelchair space, a seat designed for transfer or at least one transfer device. This exception was based on the fact that for kiddie rides, the child typically is assisted on and off the ride by an adult, which could be a parent or other supervising companion. Consequently, similarly providing access for children with disabilities to such rides via adult assistance does not result in any unequal access to the ride. Notably, requirements for an accessible route to the ride and an accessible loading/unloading area still apply. This exception also is necessary because kiddie rides typically have a full-height vehicle enclosure about the child, which serves as a body and arm restraint system to keep the child within the vehicle. Providing static openings to permit transfer onto the vehicle would compromise this safety feature.

Similarly, Exception 3 to Section 234.4 of the 2010 ADA Standards (proposed section 11B-234.4) exempts rides that do not have seats from the requirement that a wheelchair space or seat for transfer be provided. These tend to be unique rides, with patrons riding in a variety of positions, such as standing or in a prone position. Access solutions for these rides must be equally unique, but will not necessarily entail a conventional wheelchair space or transfer seat.

A similar rationale underlies certain exceptions applying to water features. For example, Exception 2 to Section 242.2 of the 2010 ADA Standards (proposed section 11B-242.2) provides that for pools, such as wave action pools and lazy rivers, where user access is limited to only one area, no more than one accessible means of entry is required. As all users are limited to one area of access, the provision of just one accessible means of entry satisfies the requirements for equal access. Exception 2 to Section 242.2 provides that a catch pool is not required to provide an accessible means of entry provided that the catch pool edge is on an accessible route. This exception was included because catch pools are an exiting point from water slides, which as discussed below, are exempted for safety reasons.

Other exceptions are warranted given the unique challenges associated in providing access to certain types of devices, in order to provide greater opportunity for creative design in achieving accessibility for specific devices. The exceptions allow certain variations in satisfying the standard, so that the thrill and entertainment value of the device experience can be maintained, or even increased, as opposed to reducing the experience for all patrons. For example, as discussed at *supra* p. 5, the minimum dimensions for a wheelchair space on ride vehicles were set so as to maintain accessibility, but still allow for the full range of motion such vehicles undergo as part of the ride experience. This increases the range of amusement rides that are capable of providing onboard wheelchair spaces.

Similarly, Section 1002.4.3 of the 2010 ADA Standards specifies maximum dimensions for horizontal and vertical gaps between the ride vehicle and loading/unloading areas. Where compliance with this requirement is not operational or structurally feasible, the exception thereto

permits the provision of a ramp, bridge plate or other device that complies with the requirements of 36 C.F.R. 1192.83(c). The rationale behind this exception is that wheelchair accessible rides are conceptually similar to small passenger vehicles, as defined in the federal accessibility standards adopted by the U.S. Department of Transportation for vehicles required to be accessible under the ADA, such as buses and vans. Flexibility in the degree of gap permitted, and the solutions for addressing that gap, are necessary given the various design needs of amusement rides and the fact that for certain rides, the gaps will not be static. For example, rides having vehicles that float on water can have pitch and yaw during loading and unloading conditions.

Finally, certain exceptions are contained in the 2010 ADA Standards for safety reasons. A main example of this type exception is the exception for water slides set forth in Section 203.11. For safety reasons, to ride a water slide a patron must be capable of maintaining the proper ride position, with legs crossed and arms crossed in a tightly held position and be capable of swimming out of the catch pool without a flotation device. In addition to these safety issues, given the height of such slides (which can be as high as 200 feet), the cost of ramping systems or elevators could well exceed the cost of the slide itself. Moreover, even if a ramp or elevator were provided, operational issues arise with respect to transporting the wheelchair from the ride entry to the exit catch pool. For all these reasons, the Access Board determined that water slides be exempted from the 2010 ADA Standards.

Conclusion

For all the foregoing reasons, CAPA respectfully requests that DSA adopt the 2010 ADA Standards regarding recreation facilities into Chapter 11B of the CBC without substantive change. Given the rigorous and extensive review and negotiation that have already occurred on these issues at the federal level, CAPA respectfully submits that no change to the 2010 ADA Standards is warranted. The specialized elements in recreation facilities are not buildings. The unique and complex issues such elements propose require more creativity in designing access solutions. Standards of accessibility for such elements cannot be adopted without a thorough understanding of the challenges these elements present and the necessary expertise to evaluate the viability of the standards. The federal regulatory process spent nearly two decades developing the 2010 ADA Standards regarding recreation facilities, so that they would satisfy the objective of providing equal access while also remaining viable in light of the practical challenges such facilities pose. The expertise that went into this process, regarding both the needs of individuals with disabilities and the challenges regarding the design and operation of recreation facilities, is without question. Accordingly, no change to the 2010 ADA Standards regarding recreation facilities is warranted.

Sincerely,



John Robinson
CEO