

FMCSA National Training Center

U.S.-Mexico Long-Haul Pilot Program Vehicle Inspection Policy

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Webinar Transcript

Presenters

• Carla Vagnini, Transportation Specialist, FMCSA North American Borders Division

Description:

This webinar provided information to FMCSA personnel about inspection requirements for motor carriers, drivers and vehicles operating in the United States-Mexico Long-Haul Pilot Program. It informed participants of current inspection policy and actions to be taken when encountering participant motor carriers, vehicles and drivers.

U.S.-MEXICO LONG-HAUL PILOT PROGRAM VEHICLE INSPECTION POLICY

PRESENTATION TITLE SLIDE: U.S.-MEXICO LONG-HAUL PILOT PROGRAM VEHICLE INSPECTION POLICY

Kirse Kelly (Webinar Coordinator, FMCSA National Training Center):

All right. Thank you very much, John, and thanks to all of you who are participating in our webinar about United States and Mexico Long-Haul Pilot Program Vehicle Inspection Policy. Today is Wednesday, September 28, 2011, and this webinar is part of the Mexican Border Program series that is being put on by the FMCSA National Training Center and the FMCSA North American Borders Division. This mandatory webinar is meant to prepare Federal and State personnel on the unique vehicle inspection processes to be implemented during the US-Mexico long-haul pilot program.

It is my pleasure now to introduce you to our presenter for today's training. Carla Vagnini is a Transportation Specialist with the North American Borders Division. So, let me go ahead and turn it over to Carla.

Carla Vagnini (Transportation Specialist, FMCSA North American Borders Division):

I'd like to thank you for taking the time to be here for the Federal Motor Carrier Safety Administration's U.S.-Mexico Long-Haul Pilot Program Vehicle Inspection Policy Webinar. We really appreciate your participation in today's webinar and your support of the U.S.-Mexico Long-Haul Pilot Program.

This training will provide FMCSA guidance on the recently issued Long-Haul Pilot Program Vehicle Inspection policy. The policy was provided in the vehicle inspection webinar but is downloadable from this webinar. The policy is the basis for this training and I will provide policy references on some slides so that you can easily locate the specific guidance. I will be focusing the training on the unique vehicle inspection processes to be implemented during the long-haul pilot program.

SLIDE 2: TRAINING OBJECTIVES

Today's training will cover the following:

- The Long-Haul Pilot Program Stages,
- Operating Authority Prohibitions and Requirements,
- Inspection Processes and Scenarios, and
- Changes from the Demonstration Project.

SLIDE 3: THE LONG-HAUL PILOT PROGRAM

Let's talk about the Long-Haul Pilot Program. It will last up to 3 years and will be implemented in three separate stages.

All participating motor carriers will proceed through three stages of requirements:

Stage 1 will begin with the initial three months after a participating carrier is granted provisional operating authority. During this stage, every time a participating carrier's vehicle and driver enter the United States it will be subject to an inspection. If the carrier is not subject to at least three vehicle and driver inspections during Stage 1, then Stage 1 may be extended.

Stage 2 will last from the end of stage 1 until the end of the mandatory 18-month monitoring period. During stage 2, participating vehicles and drivers will be subject to random inspections, like commercial zone carriers. Also during stage 2, the participating carrier will have a compliance review conducted on their entire operation. This will include drivers and vehicles operating in the commercial zone. The compliance review must result in the carrier receiving a satisfactory safety rating to move to stage 3.

A safety rating of conditional or unsatisfactory may result in suspension or revocation of the carrier's provisional operating authority.

During stage 3, participating carrier vehicles will continue to be subject to random inspections and permanent operating authority will be issued. Carriers with permanent operating authority must continue to have valid CVSA decals on their vehicles for 3 years.

You'll find this in the Vehicle Inspection Memo – Policy Reference Page 2. The policy references are in the lower left corner on this slide and future slides.

SLIDE 4: OPERATING AUTHORITY PROHIBITIONS AND REQUIREMENTS

Mexico motor carriers granted authority under the Long-Haul Pilot Program are prohibited from certain operations. They are as follows:

- Domestic Point-to-Point transportation services. This is known as Cabotage.
- Transportation of Hazardous Materials requiring placarding,
- Transportation of Passengers in the United States,
- Transportation in vehicles or with drivers not approved by FMCSA,
- Transportation of Oversized or Overweight goods (including Longer Combination Vehicles),
- Transportation by Packaging and Courier services, (these are services like FedEx), and
- Operating a motor vehicle without an operational FMCSA electronic monitoring device.

This is outlined in the Vehicle Inspection Memo – Policy Reference Pages 2-3.

SLIDE 5: ENFORCEMENT GUIDANCE FOR OPERATING AUTHORITY VIOLATIONS AND CITATIONS

If during an inspection of a motor carrier participating in the Long-Haul Pilot Program, the inspector identifies that the carrier is operating in violation of the pilot program requirements, the inspector must cite the carrier for operating beyond the scope of its authority and place the driver and/or vehicle out of service.

Inspectors must cite 49 CFR Part 392.9a(a)(2), Operating beyond the Scope of Operating Authority Granted. Inspectors should also include the language of the specific prohibition the carrier was discovered to be violating.

This is outlined in the Vehicle Inspection Memo – Policy Reference Pages 2-3.

SLIDE 6: INSPECTION PROCESSES

The vehicle inspection policy contains guidance on the following topics:

• Section 350 of the 2002 DOT Appropriation Act inspection requirements,

- Verification of Motor Carriers, Drivers and Vehicles,
- U.S. DOT Number Marking requirements,
- Commercial Driver's License requirements,
- Electronic Monitoring Device requirements, and
- Commercial Vehicle Safety Alliance (or CVSA) Inspection Decal requirements.

These are all outlined in the Vehicle Inspection Memo and will be covered in the following slides.

SLIDE 7: SECTION 350 REQUIREMENTS

Section 350 requires that Federal and State inspectors electronically verify the status and validity of each driver's license. It also requires that the drivers' licenses of no less than 50 percent of the approved drivers are checked upon entry into the U.S. Section 350 requires a distinctive U.S. DOT number for Mexico-domiciled carriers granted provisional operating authority. This is the basis for the "X" suffix to be added to each Mexico-domiciled motor carrier operating beyond the commercial zones. This was put in place to assist inspectors in enforcing motor carrier regulations including hours of service rules under Part 395.

Section 350 requires a CVSA inspection decal to be affixed to each commercial motor vehicle authorized to operate beyond the United States municipalities and commercial zones along the U.S.-Mexico border. CVSA inspections decals are required to be renewed every 90 days. Please note that nothing in this policy is intended to prevent the re-inspection of a participating carrier's vehicle with a valid CVSA inspection decal if the inspector sees cause for a re-inspection.

Finally, Section 350 requires that CVSA inspection decals are required for carriers with provisional operating authority, and for three consecutive years after that carrier receives permanent operating authority.

As you can see, Section 350 defines the foundation for Mexico-domiciled carriers seeking to operate beyond the commercial zones and municipalities, and is the basis for implementing the Long-Haul Pilot Program.

The Section 350-CVSA inspection decal requirement is outlined in the Vehicle Inspection Memo – Policy Reference Page 2.

SLIDE 8: VERIFICATION OF MOTOR CARRIERS, DRIVERS AND VEHICLES

During the Pre-Authorization Safety Audit (PASA), Mexico domiciled motor carriers must identify drivers and vehicles for FMCSA approval.

The approval process for drivers includes an English Language Proficiency (ELP) assessment, a review of their driver's license for disqualifying offenses and security vetting. This is all performed **<u>before</u>** the driver is approved for participating in the Long-Haul Pilot Program.

The approval process for vehicles includes a safety inspection, including verification of a valid CVSA decal and finally verification of Federal Motor Vehicle Safety Standards, or FMVSS. Again, this is all performed **<u>before</u>** the vehicle is approved for participating in the Long-Haul Pilot Program.

You will find this guidance on this in the PASA memo – Policy Reference Pages 4-5 and in the Vehicle Inspection Memo – Policy Reference Pages 4-5.

SLIDE 9: VERIFICATION OF MOTOR CARRIERS, DRIVERS AND VEHICLES

The lists of approved carriers, drivers and vehicles will be available to FMCSA & MCSAP staff in Query Central. The lists will be updated as new carriers, drivers and vehicles are approved. We will also update the lists when a carrier is no longer using a previously approved driver or vehicle.

Information on approved pilot program carriers and vehicles will be available on the FMCSA website listed on the slide. We are not making driver information available on this public site in order to protect the personal identification information of the participating drivers.

The next slide is a sample of a Query Central screenshot.

SLIDE 10: QUERY CENTRAL SCREENSHOT OF APPROVED CARRIER, DRIVER AND VEHICLE LISTS

This slide is a screenshot of the approved driver and vehicle lists in Query Central. This is also the first page of Attachment A of the vehicle inspection policy memo. Next we'll discuss enforcement guidance for the discovery of use of non-approved drivers and vehicles in the Long-Haul Pilot program.

SLIDE 11: ENFORCEMENT GUIDANCE FOR USE OF NON-APPROVED DRIVERS AND VEHICLES IN THE LONG-HAUL PILOT PROGRAM

If during an inspection, the inspector is unable to locate the driver or vehicle information on the lists of drivers or vehicles in Query Central, the inspector must cite the carrier for operating beyond the scope of its authority and place the driver and/or vehicle out of service.

The list of approved drivers or vehicles—a list of approved drivers or vehicles provided by the motor carrier <u>will not</u> serve as verification of an FMCSA approval. Only the drivers and vehicles listed on the approved driver/vehicle lists in Query Central will serve as proof of FMCSA approval.

Inspectors must cite 49 CFR Part 392.9a(a)(2), Operating beyond the Scope of Operating Authority Granted/Using a driver and/or vehicle not approved for use in the U.S.-Mexico Long-Haul Pilot Program.

You will find guidance on this in the Vehicle Inspection Memo – Policy Reference Pages 4-5. Next, U.S. DOT Number Marking Requirements.

SLIDE 12: U.S. DOT NUMBER MARKING REQUIREMENT

When FMCSA grants provisional operating authority to a Mexico-domiciled motor carrier to operate beyond the U.S. southern border municipalities and commercial zones, it is required to include the suffix "X" at the end of its U.S. DOT number on the approved power units. Motor carriers are advised during the PASA that all approved vehicles must be marked with an "X" after their U.S. DOT number. Carriers are also advised that non-approved vehicles may not be marked with the "X" suffix, and those vehicles that operate specifically within the commercial zones, must be marked with the "Z" suffix after the assigned U.S. DOT number. Vehicles failing to display the appropriate suffix to their assigned U.S. DOT number should be cited accordingly.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 3.

SLIDE 13: ENFORCEMENT GUIDANCE FOR U.S. DOT NUMBER MARKING VIOLATIONS AND CITATION

If during an inspection of a motor carrier participating in the Long-Haul Pilot Program, the inspector identifies the carrier is operating in a vehicle without the proper suffix to the assigned U.S. DOT number, the inspector must cite on the inspection report if the proper suffix is not included in the vehicle markings. Inspectors must cite 49 CFR Part 390.21(a), Not marked in accordance with regulations. Enforcement actions for marking violations are recommended.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 3.

SLIDE 14: COMMERCIAL DRIVER'S LICENSE REQUIREMENTS

Inspectors must perform a driver's license verification check when the pilot program driver enters the United States during the initial 3 months after their motor carrier receives provisional operating authority in the Long-Haul Pilot Program. Participating drivers will continue to be subject to driver's license verification during all random inspections and inspections required to renew CVSA inspection decals. Commercial driver's licenses should be checked using CDLIS and/or NLETS.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 3.

SLIDE 15: COMMERCIAL DRIVER'S LICENSE REQUIREMENTS

To fulfill the Section 350 requirement that at least 50 percent of the drivers' licenses be checked, the North American Borders division in FMCSA headquarters will have the drivers' license verification checks for all approved drivers completed on a daily basis. If it is discovered that an approved driver no longer holds a valid license, the driver's information will be removed from

the approved driver list in Query Central and the motor carrier will be notified. We will also notify the Division and Field Offices.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 3.

SLIDE 16: ENFORCEMENT GUIDANCE FOR COMMERCIAL DRIVER'S LICENSE VIOLATIONS AND CITATION

If during an inspection of a motor carrier participating in the Long-Haul Pilot Program, the inspector identifies a participating driver is operating in a vehicle with an invalid license or without a valid driver's license for the type of vehicle operated, the inspector must cite on the inspection report the violation and place the driver out of service. Inspectors must cite 49 CFR Part 383.23(a)(2), Operating a CMV without a CDL.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 3.

SLIDE 17: REQUIREMENTS FOR INSTALLATION OF ELECTRONIC MONITORING DEVICES WITH GPS

As a requirement of participation in the pilot program, electronic monitoring devices will be installed in approved vehicles. All participating carriers and drivers are required to use the FMCSA-issued electronic monitoring devices and cannot use paper log books. The electronic monitoring devices will be compliant with 49 CFR Parts 395.15 and 395.16.

Electronic monitoring devices will be installed in the power unit cabs and must be operating properly in each approved vehicle to allow FMCSA to monitor the movement of approved vehicles and assist in the detection of potential hours of service and Cabotage violations. Tampering with the electronic monitoring devices would result in a violation of the pilot program requirement and affect their operating authority.

As I discussed earlier, if during an inspection of a motor carrier participating in the Long-Haul Pilot Program, an inspector identifies the carrier is operating an approved vehicle and is not using the FMCSA-issued electronic monitoring devices, this will deem the participating carrier to be operating beyond the scope of its authority. The inspector must cite the carrier for operating beyond the scope of its authority and place the vehicle out of service. Inspectors must cite 49 CFR Part 392.9a(a)(2), Operating beyond the Scope of Operating Authority Granted. Inspectors should also include the language of the discovery of the vehicle being operated in violation of the pilot program requirement.

Training will be provided soon to FMCSA staff on monitoring the data reported from the FMCSA-issued electronic monitoring devices.

This guidance can be found in the Vehicle Inspection Memo – Policy Reference Page 4.

SLIDE 18: CVSA DECAL COMPLIANCE CHECK

As we discussed earlier, Section 350 requires Mexico-domiciled carriers to display a CVSA inspection decal.

During Stage 1, or the initial 3-month inspection period, Division Administrators are responsible to ensure approved power units are subjected to a CVSA decal compliance check.

If the vehicle does not display a current CVSA inspection decal, the inspector must perform a Level I or Level V inspection. As you all know, only a Level I or V inspection can result in the issuance of a CVSA inspection decal.

Inspectors must verify that drivers and vehicles are approved to participate in the Long-Haul Pilot Program, and power units display a current CVSA inspection decal, and drivers possess a valid driver's license for the type of vehicle operated, and finally, that the power unit is equipped with a FMCSA issued Electronic Monitoring Device.

You may have noted that FMCSA does not qualify trailers as a part of the pilot program; only power units, however both must still be FMVSS compliant. It is therefore highly likely that a trailer will not have a CVSA decal. This in itself is not a pilot program violation. This is a change from the demonstration project where both the power unit and trailer had to have CVSA decals.

If during an inspection, the inspector discovers the trailer is found to have critical violations that would disqualify the unit from receiving a CVSA decal, for any carrier, the power unit would retain its CVSA decal but the trailer would not. If the critical violations discovered meet the out of service criteria, the vehicle would not be allowed to proceed out of the inspection area as the out of service declared affects the combination. Or, if the critical violations discovered do not meet the out of service criteria, the trailer would be allowed to continue but would not be able to be re-dispatched until the repairs are made. This same guidance would apply to pilot program carriers since we do not require CVSA decals for trailers.

Query Central will post an alert telling the inspector the carrier, driver and vehicle are participants in the Long-Haul Pilot Program. Please see attachment A of the Vehicle Inspection Memo for samples of the Query Central screen shots. Screen shots include Driver and Vehicle list, Motor carrier identification and safety data, and Driver and Vehicle Inspection summary information.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 4 and Attachment A.

SLIDE 19: VIOLATIONS CITES FOR NOT DISPLAYING A CURRENT CVSA INSPECTION DECAL

Inspectors should use the following cites for carriers that fail to display a CVSA inspection decal. The citations are listed separately for carriers with "Provisional" and "Permanent" operating authority.

Carriers with Provisional Operating Authority, cite: 49 CFR 390.3(e)(1)/385.103(c) – Failing to comply with all applicable regulations contained in 49 CFR Parts 350-399/Failing to display a current CVSA decal as required.

Carriers with Permanent Operating Authority, cite: 49 CFR 390.3(e)(1)/365.511 – Failing to comply with all applicable regulations contained in 49 CFR Parts 350-399/Failing to display a current CVSA decal as required.

A carrier must display a CVSA decal during the provisional operating authority period and then continuously for 3 years after being granted permanent operating authority. As you can see, the citations for failing to display a CVSA decal change as the authority status changes.

You'll find this in the Vehicle Inspection Memo – Policy Reference Page 7.

On the next slide we'll discuss recording the results of the roadside inspections.

SLIDE 20: RECORDING THE RESULTS OF THE INSPECTION – ROADSIDE

Inspection Reports for participating carriers, vehicles and drivers must include the following:

- 1. Select the "PASA Inspection" box in the ASPEN inspection software on the Start page Special Check field.
- 2. Special Studies-Field 1: Enter the existing valid CVSA decal number for the power unit.
- 3. Special Studies-Field 2: Enter the existing valid CVSA decal number for the trailer.
- 4. Special Studies-Field 3: Enter Yes or No, whether a Driver License Check was completed, and
- 5. Special Studies-Field 4: Enter Yes or No, whether the Vehicle is Equipped with Required Electronic Monitoring equipment.

We recognize that not all states use ASPEN to record inspection data. The states not using ASPEN will still need to capture the required data in their inspection software and then be uploaded to FMCSA through their normal processes so the data is in MCMIS for reporting the pilot program statistics.

Inspectors must upload all inspection reports immediately or as soon as possible after completion of the report.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 5.

Next I'll cover a couple inspection scenarios for inspectors that discover a participating carrier operating an approved vehicle without a current CVSA inspection decal and provide guidance for the inspection and any subsequent enforcement action.

SLIDE 21: INSPECTION SCENARIO #1

Scenario 1: Inspection of a participating power unit not displaying a CVSA inspection decal at a southern border port of entry.

- 1. Conduct a Level I inspection. Verify operating authority.
- 2. If no critical inspection items are discovered, affix a CVSA inspection decal.
- 3. If one or more critical inspection items are discovered, record the vehicle violations, and place the vehicle out of service per CVSA criteria.
- 4. DO NOT cite the out of service violation for failing to display a CVSA inspection decal.
- 5. If one or more critical inspection items are discovered, but the violations do not meet the out of service criteria, advise the driver of the requirement for CVSA decals and that they may not continue to operate until the violations are corrected and the vehicle receives a CVSA decal. Again, refer to #4 above and do not cite the out-of-service violation for the CVSA decal.

We'll discuss the Re-Inspection guidance shortly. This guidance or process did not change from the previous demonstration project and the guidance can be found in the Vehicle Inspection Memo – Policy Reference Page 6.

SLIDE 22: INSPECTION SCENARIO #1

This slide shows a flowchart of Inspection Scenario #1 and can be found in Attachment B of the Vehicle Inspection Policy.

SLIDE 23: INSPECTION SCENARIO #2

Scenario #2: Inspection of participating power unit not displaying a CVSA inspection decal in the U.S. beyond the border port of entry.

- 1. Conduct a Level I inspection. Verify operating authority. Place the Vehicle out of service- for No CVSA Inspection Decal.
- 2. If one or more critical inspection items are discovered, record the vehicle violations. Place the vehicle out of service for vehicle defects and no CVSA decal.
- 3. If no critical inspection items are discovered, record the out of service violation of no CVSA inspection decal as required on the inspection report. Remove the out of service sticker, issue a CVSA decal and note in the inspection software verification of the out of service violation repair.
- 4. Again, we'll discuss the Re-Inspection guidance after this next slide.

As with the first scenario, this guidance and procedure did not change from the previous demonstration project and the guidance can be found in the Vehicle Inspection Memo – Policy Reference Pages 6-7.

SLIDE 24: INSPECTION SCENARIO #2

This slide shows a flowchart of Inspection Scenario #2. It can be found in Attachment C of the Vehicle Inspection Memo.

SLIDE 25: RE-INSPECTION GUIDANCE

Re-inspection Guidance. If the initial Inspector who performed the inspection is available, verify the defect(s) have been repaired, annotate in inspection software verification of repairs, and issue a CVSA inspection decal. The vehicle may now proceed out of the inspection area.

If the initial Inspector who performed the inspection is not available, another inspector must perform a Level I inspection. Verify the defect(s) have been repaired, record the previous out of service defects and verification in the notes field of the inspection software for verification of the repairs, and issue a CVSA inspection decal. The vehicle may now proceed out of the inspection area.

Vehicles with critical defects that cannot be repaired must be towed to a repair facility or returned to Mexico. These vehicles may not proceed out of the inspection area.

DAs are expected to ensure timely re-inspection of CMVs operated by Mexico-domiciled carriers participating in the long-haul pilot program that were placed out of service, whether the re-inspection was performed by a federal or state inspector following the re-inspection procedures currently in place. This guidance and procedure did not change from the previous demonstration project.

DAs are encouraged to work with their staff and State partners to complete vehicle re-inspections in a timely manner to the extent possible. The North American Borders Division staff is available to assist in providing guidance when a unique situation arises that requires further clarification.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Pages 7-8.

SLIDE 26: CHANGES FROM THE DEMONSTRATION PROJECT: ELP TESTING DURING INSPECTIONS

Now let's talk about changes from the demonstration project—English language proficiency testing during inspections. As approved drivers will have been assessed for ELP during the PASA, drivers that failed to pass the ELP assessment will not be qualified to participate in the Long-Haul Pilot Program.

ELP testing will not be performed during inspections...However; all routine inspections for approved drivers participating in the Long-Haul Pilot Program should be performed in English. And, if during the course of a routine inspection, a driver is unresponsive to requests or directions, inspectors should follow the FMCSA policy for an ELP assessment and if required place the driver out of service.

You'll find guidance for ELP in the Vehicle Inspection Memo – Policy Reference Page 4.

SLIDE 27: CHANGES FROM THE DEMONSTRATION PROJECT: CREDIT FOR PREVIOUS PARTICIPATION

Let's go over more changes from the demonstration project—credit for previous participation. A Mexico-domiciled carrier that participated in the previous demonstration project will receive credit for the amount of time it operated under that authority. This credit applies to inspections in the first 3 months and the 18-month monitoring requirement and compliance reviews.

Because the pilot program is a 3-stage program, in the Memorandum of Understanding with the Government of Mexico, the DOT agreed that the participants that operated safely in the demonstration project should not be treated the same as new participants. The demonstration project carriers will be placed in the appropriate Stage based on their experience in the prior project.

I'll provide several "examples" to explain the "Credit for the time it operated under that Authority."

Example #1: A carrier that participated in the previous demonstration project for 1 month will be subject to inspections every time they cross for the first 2 months and 17 months of monitoring plus a Compliance Review (or CR) before permanent operating authority may be issued.

Example #2: A carrier that participated in the previous demonstration project for 2 months will be subject to inspections every time they cross for the first month and 16 months of monitoring plus a CR before permanent operating authority may be issued.

Example #3: A carrier that participated in the previous demonstration project for 6 months will not be subject to Stage 1 inspections. Instead, they will be inspected randomly like other commercial zone carriers. They will, however, still require 12 months of monitoring plus a CR before permanent operating authority may be issued.

You'll find this guidance in the Vehicle Inspection Memo – Policy Reference Page 4.

SLIDE 28: TRAINING OBJECTIVES REVIEW

So to recap, we've just discussed the following—The Long-Haul Pilot Program Stages, Operating Authority Prohibitions and Requirements, Inspection Processes and Scenarios, and Changes from the Demonstration Project.

Carla Vagnini:

Again, we'd just like to thank you for taking the time to be here for the Federal Motor Carrier Safety Administration webinar on the Long-Haul Pilot Program Vehicle Inspection Policy. We recognize that there are going to be unique vehicle inspection situations that occur during implementation of the Long-Haul Pilot Program. And we will work together, with you, our federal and state partners to ensure that we uniformly perform inspections of these vehicles and get the guidance out on those unique situations that do occur during implementation of the Pilot Program. But, thank you again today for participating.

[36:12] (End Time for Webinar)