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American National Standards Institute



Second Quarter - 2016

#### MESSAGE FROM THE PRESIDENT AND CEO

S. Joe Bhatia, President and Chief Executive Officer

#### Dear colleagues:

When it comes to standards that are incorporated by reference (IBR), the standards community has had a number of significant wins in the past several years.

- The Administrative Conference of the United States (ACUS) came out with a recommendation in December 2011 that supports our views on reasonable availability of IBR-ed standards.
- The Office of the Federal Register (OFR) issued a final rule on IBR in November 2014 that again supported our viewpoints and asserted that IBR-ed standards maintain their copyright. OFR also released an IBR Handbook in April 2016 further underscoring these points.
- And most critically, the Office of Management and Budget (OMB) released in January 2016 its long-awaited revision to Circular A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities." This document is broadly supportive of the standardization system and supports our views on IBR.



It's important to note that each of these activities took place in a public forum, with opportunity for public comments from everyone - supporters and detractors alike. All viewpoints were considered, and ultimately, we are fortunate that the final guidance documents are in alignment with our views. Each federal agency concluded that reasonable availability was the best path forward, and that SDOs and agencies should work together in each case to determine how the IBR-ed standards could be made available in a way that meets the needs of all parties.

But an effort is currently underway at the American Bar Association (ABA) that seeks to challenge the conclusions reached by ACUS, OFR, and OMB. A proposed ABA Resolution, which will be up for vote before the entire ABA House of Delegates in August, encourages Congress to amend the Administrative Procedure Act to require agencies to make IBR-ed standards accessible, without charge, to members of the public - at minimum: online, read-only access to the incorporated portion of the standard. The Resolution further requests that agencies review their historical incorporations by reference, and make such arrangements for these standards as well, or amend or repeal the regulation to eliminate the incorporation by reference.

This significant change could not only jeopardize the U.S. standardization system, but may also put some SDOs out of business.

I'm writing today to encourage you to review the proposed ABA Resolution, read ANSI's comments on it, and share your views with ABA members, including in particular ABA State Delegates, who may be sensitive to our viewpoints. Because this matter is being considered by the ABA House of Delegates, only certain ABA members may vote, and there is no meaningful opportunity for outside voices or commentary.

It strikes me as ironic that those who advocate so strongly for the public's right to information are now trying to force a significant decision through a closed forum.

In effect, our system's future may be determined by a room full of individuals who have never heard our perspective, and have little to no knowledge of who we are and what we do. It's incumbent upon all of us to help educate the ABA House of Delegates and change hearts and minds.

As an ANSI member, you are impacted by this issue. Please read the materials, forward them to your outside counsel (who may be able to help you find your ABA State Delegate) and other ABA members, and encourage them to contact their delegates to help impact this critical vote. Should you have any questions or need assistance, ANSI stands ready to help you - contact Patty Griffin, ANSI vice president and general counsel (pgriffin@ansi.org).

Best regards,

S. Joe Bhatia

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American Bar Association Resolution on IBR Scheduled for August Vote Standards Community Urged to Speak Up, Contact ABA Delegates 06/21/2016

A proposed American Bar Association (ABA) Resolution encourages Congress to amend the Administrative Procedure Act to require agencies to make standards that have been incorporated by reference (IBR) accessible, without charge, to members of the public – at minimum: online, read-only access to the incorporated portion of the standard. The Resolution further requests that agencies review their historical incorporations by reference, and make such arrangements for these standards as well, or amend or repeal the regulation to eliminate the incorporation by reference.



"This significant change could not only jeopardize the U.S. standardization system, but may also put some standards developing organizations out of business," said S. Joe Bhatia, president and CEO of the American National Standards Institute (ANSI), in a recent message to ANSI members.

Mr. Bhatia encouraged members to review the proposed ABA Resolution, read ANSI's comments on it, and share their views with ABA members, including in particular ABA State Delegates, who may be sensitive to the viewpoints of the standardization community.

The Resolution will be up for vote before the ABA House of Delegates in August 2016.

Other recent significant decisions on IBR – including the December 2011 Administrative Conference of the United States (ACUS) recommendation; the November 2014 Office of the Federal Register (OFR) final rule; and the January 2016 Office of Management and Budget (OMB) revision to Circular A-119 – have all provided opportunity for public comments. No such open, public comment structure is available for the ABA Resolution.

"It strikes me as ironic that those who advocate so strongly for the public's right to information are now trying to force a significant decision through a closed forum," said Mr. Bhatia. "It's incumbent upon all of us to reach out to ABA members, help educate the ABA House of Delegates, and change hearts and minds."

Further questions may be directed to Patty Griffin, ANSI vice president and general counsel (pgriffin@ansi.org).

For more information and history on the IBR issue, visit www.ansi.org/ibr.



# ANSI Comments to the American Bar Association Resolution on Incorporation by Reference

June 2016

On behalf of the U.S. standardization community, the American National Standards Institute<sup>1</sup> (ANSI) respectfully submits the following comments on the American Bar Association (ABA) Resolution that deals with the matter of standards that have been incorporated by reference (IBR) into law.

In summary, the Resolution would request that Congress amend the Administrative Procedure Act to require agencies to make IBR-ed standards accessible, without charge, to members of the public – at minimum: online, read-only access to the incorporated portion of the standard. The Resolution further requests that agencies review their historical incorporations by reference, and make such arrangements for these standards as well, or amend or repeal the regulation to eliminate the incorporation by reference.

ANSI disagrees with this position and takes this opportunity to present four specific concerns about the Resolution to interested ABA members.

- 1. First, ANSI is concerned that the ABA may be making decisions in a vacuum and without the significant input and analysis already developed on this subject by three government agencies:
  - Administrative Conference of the United States (ACUS) Recommendation: Incorporation by Reference (December 2011)<sup>2</sup>
  - Office of the Federal Register (OFR) Final Rule: Incorporation by Reference (November 2014)<sup>3</sup>
     OFR IBR Handbook (April 2016)<sup>4</sup>
  - OMB Circular A-119: Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities (January 2016)<sup>5</sup>

<sup>1</sup> ANSI is a private, non-profit organization that administers and coordinates the U.S. voluntary standards and conformity assessment system. http://www.ansi.org/

<sup>3</sup> https://www.federalregister.gov/articles/2014/11/07/2014-26445/incorporation-by-reference

<sup>&</sup>lt;sup>2</sup> https://www.acus.gov/recommendation/incorporation-reference

<sup>4</sup> https://www.archives.gov/federal-register/write/handbook/ibr.pdf

<sup>&</sup>lt;sup>5</sup> https://www.whitehouse.gov/sites/default/files/omb/inforeg/revised circular a-119 as of 1 22.pdf

These groups have considered all sides of this issue during the past 5 years, and each agency has ultimately supported the need for copyright protection and a flexible approach for assuring the reasonable availability of IBR-ed material.

This effort to push the matter through ABA in the form of a Resolution feels like an end run around multiple fairly and publicly developed government guidance documents. In particular, the ink is barely dry on the 2016 revision of OMB Circular A-119, so it is hard to give credence to any assertion that the system isn't working when the latest approaches suggested in that document have hardly been given a chance to be implemented.

In summary, it strikes ANSI as ironic that those who advocate so strongly for the public's right to information are now trying to force a significant decision through a closed forum.

2. Second, prohibiting agencies from using IBR without first obtaining the free and unlimited access to copyright-protected documents will severely constrain an agency's ability to make use of consensus-driven standards, which is directly counter to federal policy set forth in OMB Circular A-119 and to the *National Technology Transfer and Advancement Act of 1995* (NTTAA).<sup>6</sup>

Generally speaking, ANSI would discourage agencies from bearing the cost of making materials available for free online. If agencies subsidize the costs of standards, then budgets will need to be substantially increased in order to pay such costs (e.g., through taxes or additional interest on the national debt). In addition, new staff and contracting mechanisms would be required to negotiate with SDOs on appropriate compensation for standards development and dissemination.

Consider the following findings of the Federal Energy Regulatory Commission (FERC), published in the *Federal Register* in December 2009<sup>8</sup>:

When the Commission weighed the advantages achieved by the North American Energy Standards Board (NAESB) standards development process against the cost to the Commission and the industry of developing these standards through notice and comment rulemaking, we found, and continue to find, that the benefits of having a well-established, consensus process outweigh whatever costs non-members may incur in having to obtain copies of the standards.

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<sup>&</sup>lt;sup>6</sup> http://www.nist.gov/standardsgov/nttaa-act.cfm

<sup>&</sup>lt;sup>7</sup> Requiring that U.S. government agencies pay license fees for access to standards introduces another challenge: it would likely make the U.S. government the monopoly purchaser of standards, and could compromise balanced influence and representation of all stakeholders within the standards development process. These changes would fundamentally undermine the current market-based standardization system.

<sup>&</sup>lt;sup>8</sup> http://edocket.access.gpo.gov/2009/E9-28619.htm

As one of the biggest users of standards, the U.S. government's participation in and support of standards development activities as mandated by the NTTAA are of the utmost importance. The standardization community highly values the expert input that government employees provide and the reliance that agencies demonstrate by adopting voluntary consensus standards and compliance programs.

ANSI feels that forcing agencies to obtain free and unlimited access to IBR-ed materials could have a chilling effect on agencies' willingness to refer to voluntary standards in support of regulatory actions.

3. Third, a requirement of read-only online access is problematic for many SDOs. Practically speaking, this will devastate the market for purchasing the standards from the SDO, and will eliminate the primary source of funding for the development of these standards.

Some SDOs believe that the Resolution's proposed limitation to "read-only" disclosure of copyrighted material, as well as the suggestion that proposed legislation would not impact copyright "rights or defenses," is illusory in today's global technology world. Technical professionals increasingly access and work in the field with documents on mobile devices, as opposed to desktop computers or hard copies. Calling up a standard on a tablet or a personal phone to "read" its contents is precisely how such standards tend to be utilized.

ANSI agrees that public and private interests must be balanced and, to that end, everyone should have the right to access standards referenced into law and be able to review such work at government facilities and libraries on a read-only basis. Depending on the nature of the standard and its intended use, many such standards could also be electronically available for viewing for free on either a long- or short-term basis, but a blanket "one size fits all" mandate is not in the public interest. Reasonable access does not mean that everyone has the right to own a free copy or that SDOs should have their copyrights rendered meaningless because their standards are available for free on the web. Copyright protection must be afforded to standards developers for their original works of authorship.

SDOs that have only a small portion of their standards IBR-ed may not feel this burden as acutely, and so they may be comfortable with read-only access. But for those SDOs that produce a single, massive standard that has been IBR-ed, it's clear to see how this Resolution would destroy, or at least fundamentally alter, that business. If a government agency is now forced to provide funding for an IBR-ed standard, and an SDO's sole work product is that standard, then the SDO is essentially no longer a consensus-based non-profit organization; it is in effect operating as a de facto government entity. This not only disrupts the business model of that organization, it also significantly alters the very nature of our nation's private-sector-led, market-driven standardization system.

The destructive potential of this Resolution could also leave a safety vacuum that cannot be easily filled – if SDOs are forced to go out of business, then what will happen to the hundreds upon hundreds of standards that protect health, safety, and the environment? This could put the general

public at serious risk. How will the government, without the presence of SDOs, efficiently convene thousands of subject-matter experts from industry, insurers, regulatory authorities, unions, end users, and other interested parties to draft and maintain highly technical standards addressing a multitude of specialized disciplines? Who will pay for this activity? How quickly will progress advance? And how many injuries and avoidable accidents will occur in the interim?

4. Finally, as ACUS, OFR, and OMB have each recognized in their guidance documents, this matter cannot be solved with a single-size solution. While the report attached to the ABA Resolution attempts to address some of this complexity, ANSI believes that there is much more to understand, both in terms of the business/market implications and the technical complexity of implementing the Resolution as currently written. And ANSI believes the government's extensive multi-year review of this issue and guidance to agencies reflecting substantial, diverse public input ought to be given sufficient time to work before the ABA engages on this controversial issue.

ANSI has an Organizational Member Forum (OMF), which consists of nearly 250 ANSI-accredited standards developers. We would be pleased to assist the ABA by convening a meeting of the ABA and the OMF, so the potential effects of this Resolution's proposals can be more thoroughly explored and understood.

The ABA should not lend its considerable voice to this issue without due consideration of the very real ramifications that this Resolution presents.

For further information on ANSI's position on IBR, please visit <a href="www.ansi.org/ibr">www.ansi.org/ibr</a>, where you may also read our public comments submitted to OFR (and its National Archives and Records Administration, NARA) and OMB when those agencies weighed the same issue.

ANSI appreciates this opportunity to share more information about the U.S. standardization system, and welcomes further dialogue on this critical issue. We thank you for this opportunity to provide comments.

DLN: 93493121006334

Form 990

Department of the Treasury Internal Revenue Service

### **Return of Organization Exempt From Income Tax**

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

▶ Do not enter Social Security numbers on this form as it may be made public By law, the IRS generally cannot redact the information on the form

▶ Information about Form 990 and its instructions is at <a href="https://www.IRS.gov/form990">www.IRS.gov/form990</a>

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✓ Yes 厂No

☐ Yes ☑ No

#### Part III Statement of Program Service Accomplishments

Briefly describe the organization's mission

TO ENHANCE BOTH THE GLOBAL COMPETITIVENESS OF U.S. BUSINESS AND THE U.S. QUALITY OF LIFE BY PROMOTING AND FACILITATING VOLUNTARY CONSENSUS STANDARDS AND CONFORMITY ASSESSMENT SYSTEMS, AND SAFEGUARDING THEIR INTEGRITY

Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? . .

If "Yes," describe these new services on Schedule O

- $\hbox{ Did the organization cease conducting, or make significant changes in how it conducts, any program } \\$ □ Yes ▽ No If "Yes," describe these changes on Schedule O
- Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported
- 1,987,507 including grants of \$

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INTERNATIONAL STANDARDS PROGRAMSANSI IS THE SOLE U.S. REPRESENTATIVE AND DUES-PAYING MEMBER OF THE TWO MAJOR NON-TREATY INTERNATIONAL STANDARDS ORGANIZATIONS, THE INTERNATIONAL ORGANIZATION FOR STANDARDIZATION (ISO) AND THE INTERNATIONAL ELECTROTECHNICAL COMMISSION (IEC) VIAS THE U.S. NATIONAL COMMITTEE (ALL ISC ACTIVITIES ARE UNDERTAKEN BY THE USNC, A COMMITTEE OF ANSI), AS WELL AS THE PACIFIC AGEA STANDARDS CONGRESS (PASC) AND THE PAN AMERICAN STANDARDS CONGRESS (PASC) AND THE PAN AMERICAN STANDARDS COMMISSION (COPANT). ANSI IS ALSO A MEMBER OF THE INTERNATIONAL ACCREDITATION FORUM (IAF) AND THE PACIFIC ACCREDITATION COOPERATION (PAC). THROUGH ANSI AND ITS USNC, THE U.S. HAS IMMEDIATE ACCESS TO THE FULL SPECTRUM OF TECHNICAL ACTIVITIES OF ISO AND IEC AND ADMINISTERS MANY KEY INTERNATIONAL COMMITTEES AND SUBGROUPS. THROUGH ITS U.S. TECHNICAL ADVISORY GROUPS (TAGS), OVER 5,000 U.S. POSITIONS ON ACTIVITIES AND BALLOTS OF THE VARIOUS INTERNATIONAL TECHNICAL COMMITTEES AND EDUCATED AND ADVOCATED ANNUALLY IN 2013, THE U.S. WAS ACTIVE IN 576 ISO AND IG 06 IEC TECHNICAL COMMITTEES AND SUBGROUPS. THROUGH ITS U.S. PECHNICAL COMMITTEES AND SUBGROUPS THROUGH ITS U.S. PECHNICAL COMMITTEES AND DISTORMENT OF ACCREDITATION IN THESE COMMITTEES, INADDITION TO ACTIVE U.S. PARTICIPATION IN THESE COMMITTEES, THROUGH ANSI AND ITS USNC, U.S. INTERESTS ARE ABLE TO HOLD KEY LEADERSHIP ROLES, SERVING AS CHAIR AND/OR SECRETARY TO I.17 ISO AND 58 IEC COMMITTEES IN ADDITION, ANISI AND ITS USNC PLUX STRONG LEADERSHIP ROLES, IN THE GOVERNING BODIES OF BOTH ISO AND IEC. WITHIN ISO, ANSIS VICE PRESIDENT OF ACCREDITATION PROGRAMS SERVES AS THE CHARMAN OF THE ISC. INDIVIDUALS FROM THE ISO.

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Other program services (Describe in Schedule O )

14,495,535 including grants of \$ ) (Revenue \$ 26,685,830)

Total program service expenses ► 29,664,911

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	12	Total revenue.	See Instructions .		37,325,400	36,547,763	26,795	750,842

26

Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here ► T if following SOP 98-2 (ASC 958-720)

Part IX Statement of Functional Expenses Section 501(c)(3) and 501(c)(4) organizations must complete all columns All other organizations must complete column (A) .[▽ Check if Schedule O contains a response or note to any line in this Part IX (D) (B) (C) Do not include amounts reported on lines 6b, Management and Program service Fundraising 7b, 8b, 9b, and 10b of Part VIII. Total expenses expenses general expenses expenses Grants and other assistance to governments and organizations in the United States See Part IV, line 21 Grants and other assistance to individuals in the United States See Part IV, line 22 Grants and other assistance to governments, 3 organizations, and individuals outside the United States See Part IV, lines 15 and 16 Benefits paid to or for members 5 Compensation of current officers, directors, trustees, and 3,289,715 2,626,649 663,066 key employees . . . Compensation not included above, to disqualified persons 6 (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) . . . 7 Other salaries and wages 9,205,085 6,234,114 2,970,971 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions) . . . 1,361,458 1,016,970 344,488 Other employee benefits . . . . . 1,688,105 1,227,064 461,041 10 777,126 547,704 229,422 Fees for services (non-employees) 11 Management . . . . . а Legal . . . . . . . . 165,104 165,104 b 75,000 75,000 c Accounting . . . . . . d Professional fundraising services See Part IV, line 17 Investment management fees . . . . . 70.763 70,763 Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O) . . . . . . . . . 3,879,050 3,509,577 369,473 12 Advertising and promotion . 1,401,025 1,401,025 13 868,914 562,281 Office expenses . . . . . . 306.633 14 Information technology . . . . . 292,212 292,212 15 Royalties . 6,827,372 6,827,372 16 1,760,579 1,415,272 345,307 17 956,815 815,883 140.932 Payments of travel or entertainment expenses for any federal, 18 state, or local public officials . . . . . 19 Conferences, conventions, and meetings . . . . 984,123 700,230 283,893 20 21 Payments to affiliates . . . . . . 22 Depreciation, depletion, and amortization . . . . . 241,117 241,117 23 145,603 145,603 24 Other expenses Itemize expenses not covered above (List miscellaneous expenses in line 24e If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O) а FOREIGN DUES & OVERSEAS 2,719,928 2,719,928 b BAD DEBT EXPENSE 60,842 60,842 c d All other expenses 25 Total functional expenses. Add lines 1 through 24e 36,769,936 29,664,911 7,105,025 0

## Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

(A)  Name and Title	(B) Average hours per week (list any hours for related	Posit more th persoi and a	ion (d nan oi n is b dired	ne bo oth a	ox, u an of trus	nless ficer tee)		(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and	
	organizations below dotted line)	Individual trustee or director	Institutional Trustee	Officei	Key employee	Highest compensated employee	Former			related organizations	
EDWARD MANNS	2 00	х						0	0	0	
DIRECTOR  JAMES MATTHEWS	2 00	x						0	0	0	
DIRECTOR URVASHI RANGAN	2 00	.,									
DIRECTOR JOSEPH MCGUIRE	2 00	X						0	0	0	
DIRECTOR	2 00	х						0	0	0	
ALEC MCMILLAN	2 00	х						0	0	0	
DIRECTOR SUSAN MILLER DIRECTOR	2 00	х						0	0	0	
STEVE OKSALA	2 00	х						0	0	0	
DIRECTOR WILLIAM RAISCH	2 00	х						0	0	0	
DIRECTOR CLAIRE RAMSPECK	2 00										
DIRECTOR BONNIE ROSE	2 00	Х						0	0	0	
DIRECTOR		×						0	0	0	
GREG SAUNDERS DIRECTOR	2 00	×						0	0	0	
DAN ROLEY DIRECTOR	2 00	х						0	0	0	
ALVIN SCOLNIK	2 00	х						0	0	0	
DIRECTOR PARIS STAVRIANIDES	2 00	х						0	0	0	
DIRECTOR ROBERT WILLIAMS	2 00	х						0	0	0	
DIRECTOR JAMES THOMAS	2 00							0	0		
DIRECTOR		х						0	0	0	
KATHLEEN THUNER DIRECTOR	2 00	×						0	0	0	
JAMES TURNER	2 00	х						0	0	0	
DIRECTOR ANDY UPDEGROVE	2 00	х						0	0	0	
DIRECTOR RACHEL WEINTRAUB	2 00							_		_	
DIRECTOR CYNTHIA WOODLEY	3.00	Х						0	0	0	
DIRECTOR	2 00	х						0	0	0	
DONALD WRIGHT	2 00	×		х				0	0	0	
DIRECTOR SARANJIT BHATIA	35 00			х				908,874	0	160,581	
PRESIDENT & CEO FRANCES SCHROTTER	35 00			V				270 540	^	02.020	
SENIOR VICE PRESIDENT PATRICIA GRIFFIN	35 00			Х				379,518	0	93,920	
VP GENERAL COUNSEL				Х				304,596	0	74,818	

Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

(A) Name and Title	(B) A verage hours per week (list any hours for related organizations below dotted line)	Pore individual trustee or director	ion (d nan oi n is b	ne bo oth a ctor/	ox, u an of trus	nless ficer tee)	Former	(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
GARY KUSHNIER  VP INTERNATIONAL POLICY	35 00			Х				256,487	0	138,403
LANE HALLENBECK  VP CONFORMITY	35 00			х				289,456	0	111,673
MARGARET JENSEN  VP FINANCE & ADMIN	35 00			х				277,610	0	96,483
SCOTT COOPER  VP PUBLIC POLICY AND GOVER	35 00			х				208,536	0	76,019
GEORGE GULLA  VP PUBLICATIONS	35 00			Х				273,385	0	97,687
MICHAEL PETOSA  VP IT	35 00			Х				252,816	0	76,697
ROBERT HAGER SENIOR DIRECTOR PUBLISHING	35 00					х		161,175	0	39,713
ROBERT RUSSOTTI DIRECTOR ONLINE MARKETING	35 00					х		168,614	0	70,283
ANNE CALDAS SENIOR DIRECTOR PSA	35 00					х		165,025	0	73,223
ROY SWIFT SENIOR PROGRAM DIRECTOR	35 00					х		170,397	0	28,299
MARK BROWN DIRECTOR SALES	35 00					х		180,041	0	51,000