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10 UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO HEADQUARTERS

12 UNITED STATES OF AMERICA,	)	No.
13	)	
14 Plaintiff,	)	
15 v.	)	DECLARATION OF
16	)	ANN M. VENEMAN,
17 PACIFIC MARITIME ASSOCIATION,	)	SECRETARY OF AGRICULTURE
18	)	
19 and	)	
20	)	
21 INTERNATIONAL LONGSHORE AND	)	
22 WAREHOUSE UNION,	)	
23	)	
24 Defendants.	)	
25	)	

21 I, ANN M. VENEMAN, hereby declare and say:

22 1. I am the Secretary of Agriculture, a position I have held since January, 2001. I make  
23 this declaration on the basis of information provided to me in the course of my official duties,  
24 including information provided to me by the Office of the Chief Economist of the Department of  
25 Agriculture.

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1 **EFFECTS ON AGRICULTURE OF A CLOSURE**  
2 **OF WEST COAST PORT FACILITIES**

3 2. I have been asked in this declaration to address the effects of a closure of West Coast  
4 ports on agriculture. A general overview of these effects is provided below, followed by a  
5 discussion of (1) the current state of the U.S. farm economy and the role of exports; (2) the value  
6 of agricultural trade moving through ports; (3) impacts on grain and cotton markets; (4) customer  
7 impacts; (5) food aid shipments; and (6) logistical impacts.

8 **OVERVIEW**

9 3. The labor strike that closed West Coast ports to trade is having serious short-term  
10 impacts and will have even more significant adverse medium-term impacts on the U.S. agriculture  
11 industry. U.S. agriculture is very dependent economically on international trade with annual  
12 exports equal to about 25 percent of the value of production. For crops, the production from about  
13 one acre out of every three moves to export markets. About one-half of all U.S. agricultural  
14 exports move through West Coast ports. Consequently, the closure of these ports is backing farm  
15 products up through the marketing chain, causing a sharp curtailment in farm-level demand. This  
16 disruption in movement is reducing farm prices and farm incomes. Marketers, shippers, and  
17 processors are also seeing demand for their services cease, causing income declines and job losses.

18 4. The major immediate effect is being felt in container trade moving through these ports.  
19 Containers are used to ship high-value and perishable agricultural commodities. West Coast ports  
20 handled 58 percent of all containerized agricultural exports from the United States during 2001.  
21 The tables that comprise the four attachments to this declaration indicate the average number of  
22 containers and estimated values of the top agricultural products imported and exported for  
23 October, November, and December 1999, 2000 and 2001 via West Coast ports. These container  
24 figures represent only a small percentage of total annual shipments. (Note, the terms “bulk,”  
25 “breakbulk,” and “container” used in this declaration and in the attachments refer to the method of  
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1 shipping, *i.e.*, the physical attribute of the box used to carry the commodity and the type of ship  
2 best suited to handle that freight.)

3 5. Containers generally carry time-sensitive, perishable commodities, such as fruit,  
4 vegetables, poultry, fish, and meat. Shippers contacted by USDA have already raised concerns  
5 that containers left in yards during the West Coast port closure are suffering general deterioration  
6 of product quality. For produce, this is especially serious, because once the product deteriorates,  
7 its value is driven to zero and the product essentially sold at no salvage value. Ultimately, growers  
8 and grower-shippers bear the costs of lost or lower quality product. Bulk product trade is also  
9 being affected, but economic losses may be relatively smaller as much of the bulk trade is grain,  
10 where loading tends to be much more automated and the grain is more easily stored. Most U.S.  
11 bulk commodities shipped for export leaves through Gulf ports; the exception is wheat produced in  
12 the Pacific Northwestern States and cotton and rice produced in California. Other bulk trade being  
13 seriously affected includes citrus fruit (lemons and oranges) and vegetable oils.

14 **(1) The current state of the U.S. farm economy and the role of exports**

15 6. The health of the U.S. farm economy very much depends on exports. U.S. agricultural  
16 exports rose steadily during the early to mid-1990s, reaching a record high in 1996 of nearly \$60  
17 billion. However, a global economic slowdown, the Asian currency crisis in 1997-98, and  
18 increasing strength of the dollar led to a drop in agricultural exports to only \$49 billion in 1999.  
19 Along with the decline in exports, prices for major crops fell to 15-25 year lows.

20 7. After bottoming out in 1999, U.S. agricultural exports have been slowly rising. Exports  
21 were \$50.7 billion in fiscal 2000, \$52.7 billion in 2001 and are forecast to be \$53.5 billion in 2002.  
22 A further increase to \$57.5 billion was forecast for fiscal 2003, as of late August, but a prolonged  
23 work stoppage at West Coast ports would jeopardize this forecast. As exports have begun to rise,  
24 there has been a modest improvement in the farm economy. In addition, prices for some crops  
25 have strengthened considerably because the widespread drought has reduced supplies.  
26 Nevertheless, farm prices for livestock are especially weak as drought conditions have caused

1 producers to market cattle earlier than normal, thus increasing supplies. The curtailment of poultry  
2 exports to Russia also increased domestic supplies of poultry.

3 8. U.S. net cash farm income (gross cash farm income minus gross cash expenses) is  
4 forecast at only \$51 billion in 2002, compared with \$60 billion in 2001 and the previous 10-year  
5 average of \$57 billion. The U.S. farm economy will not improve without strong agricultural  
6 exports. A closure of West Coast ports coming at a time when U.S. farm income is already down,  
7 despite being augmented by added Federal support, could seriously aggravate the U.S. farm  
8 economy.

### 9 **(2) Value of agricultural trade moving through ports**

10 9. U.S. agriculture generates a consistent annual trade surplus for the economy, year after  
11 year, helping defray an overall trade deficit. Agricultural exports in fiscal 2001 were \$52.7 billion,  
12 or an average of \$4.4 billion monthly. Imports of agricultural products were valued at \$39.0  
13 billion, leaving an agricultural trade surplus of \$13.7 billion.

14 10. Agricultural trade through West Coast ports is normally brisk during  
15 October—especially for high-value perishable fruits and vegetables destined for Asian markets—and  
16 tapers off during the month of December. This perishable product trade is especially important to  
17 West Coast producers, making their livelihood particularly vulnerable to port shutdowns. Of about  
18 \$200 billion in annual total U.S. value of farm sales, California ranks first with about \$26 billion in  
19 total sales and first in production of fruits and vegetables. Fruit and vegetables account for about  
20 one-half of California's total value of agricultural production. Washington ranks third nationally  
21 in combined fruit and vegetable production, while Oregon ranks fourth in fruit production and  
22 tenth in vegetable production. Nearly 30 percent of U.S. fresh fruit exports shipped through West  
23 Coast ports are shipped during October-December, and 27 percent of fresh and frozen vegetable  
24 exports move through West Coast ports during these months.

25 11. Altogether, approximately \$2 billion of containerized high-value agricultural exports  
26 and an average of nearly 1.2 million metric tons of lower-valued bulk agricultural shipments worth  
27 more than \$250 million move through West Coast ports each month during October-December.

1 That is equivalent to nearly 50 percent of U.S. agricultural exports, on a monthly average basis,  
2 moving through West Coast ports. The West Coast port closure means an export loss of \$500  
3 million per week in agricultural commodities.

4 12. Agricultural imports are also important to West Coast ports. Imports arriving at West  
5 Coast ports totaled nearly \$1 billion in October 2001. Key imported commodities affected by port  
6 closures include bananas, shrimp, coffee, frozen fish, and other products. U.S. consumers will  
7 increasingly be affected by reduced supplies of these products. Businesses and employees directly  
8 associated with the importation, processing, transporting and financing of these goods are also  
9 being negatively affected.

### 10 **(3) Impacts on Grain and Cotton Markets**

11 13. In particular, wheat growers in the Pacific Northwest (PNW) and cotton and rice  
12 producers in California are adversely affected by closure of West Coast ports. Washington is the  
13 third largest wheat producing state, producing about \$440 million in wheat annually, and  
14 California is the nation's second leading producer of cotton and rice, producing about \$650 million  
15 in cotton and \$150 million in rice annually. Roughly 85 to 90 percent of Washington wheat is  
16 exported through the PNW, with similar percentages for exports of wheat grown in Idaho and  
17 Oregon. Nearly two-thirds of cotton production is exported, with about one-half exported through  
18 West Coast ports. These producers are likely to face sharply lower prices with a continued West  
19 Coast port closure. Sales receipts are falling, storage costs are rising, and sales opportunities could  
20 be permanently lost if the port closure endures.

21 14. The average value of wheat exported through the PNW during the 3 months of  
22 October, November, and December typically exceeds \$566 million (based on current fob prices at  
23 port). Altogether, the PNW handles nearly 40 percent of total U.S. wheat exports, 15 percent of  
24 corn exports, and 8 percent of soybean exports, for a total of 19 percent of all U.S. grain and  
25 oilseed exports. Corn and soybeans can more easily be diverted to the Gulf than wheat, as most  
26 corn and soybeans moving through the PNW originate in Minnesota, Nebraska, North Dakota, and  
27 South Dakota.

1 15. Diverting West Coast grain to Vancouver, Canada, is not considered feasible by most  
2 shippers for several reasons. Vancouver is experiencing its own labor strife. With respect to  
3 grains, (and assuming Vancouver was operating at normal capacity) Vancouver ships primarily  
4 wheat and barley, whereas the PNW ports also handle corn, soybeans, and sorghum.  
5 Consequently, the elevators at Vancouver may not be equipped to handle these other grains.  
6 Finally, even though Vancouver exports wheat, Canada classifies its wheat differently than the  
7 United States. Although Canadian western red spring wheat is comparable to U.S. hard red spring  
8 wheat, Canadian elevators do not handle soft white, white club, or hard red winter wheat varieties.  
9 Even if additional port capacity were available further north in Canada at Prince Rupert, diverting  
10 goods there would be complex and costly, especially now that normal Vancouver traffic is being  
11 handled there.

#### 12 **(4) Customer impacts**

13 16. Japan, Korea, Taiwan, Hong Kong, China, Indonesia, Thailand, Philippines, India, and  
14 Malaysia are the top ten destinations for containerized U.S. agricultural exports from West Coast  
15 ports. Together, these countries received 83 percent of all agricultural shipments exported from  
16 the West Coast during 2001. The United States has undertaken extensive efforts to build these  
17 markets. Some of these countries have maintained protectionist policies, voicing concern about  
18 food security. The United States has consistently pressed through such venues as the World Trade  
19 Organization (WTO) and the Asian Pacific Economic Cooperation Forum to open these markets,  
20 emphasizing that food security does not mean only self-sufficiency, but that food security can be  
21 obtained through trade. However, as U.S. port closures limit these countries' access to food, the  
22 role of the United States as a reliable supplier is being called into question. The result could be  
23 permanently lost sales as these countries turn to other suppliers.

24 17. In addition, the United States is currently negotiating increased liberalization of  
25 agricultural trade in the WTO Doha Development Agenda scheduled for completion by 2005. A  
26 reduction or disruption of U.S. exports to Asian markets could strengthen arguments for these  
27 countries to maintain tariffs and domestic subsidies in order to enhance or maintain food security.

1 **(5) Food aid shipments**

2 18. The majority of U.S. government food aid assistance made available by USDA and the  
3 United States Agency for International Development to foreign nations, including shipments made  
4 under section 416(b) of the Agricultural Act of 1949 (7 U.S.C. 1431(b)), the Food for Progress Act  
5 of 1985 (7 U.S.C. 1736o), Title I of the Agricultural Trade Development and Assistance Act of  
6 1954 (7 U.S.C. 1691, *et seq.*), and the Agricultural Trade Development and Assistance Act of 1954  
7 (7 U.S.C. 1691, 1701, *et seq.*), is shipped out of the U.S. Gulf. However, a significant amount of  
8 food aid shipments does occur from West Coast ports, and some shipments are scheduled during  
9 the next several weeks. For Afghanistan, a vessel scheduled to carry 46,000 metric tons of bulk  
10 wheat has been delayed in Portland, Oregon, after only partially loading its cargo. Other  
11 scheduled shipments of bulk grains include 25,000 metric tons of bulk wheat to load at Portland  
12 for shipment to Yemen and 17,300 metric tons of bulk wheat to load at Vancouver, Washington,  
13 for shipment to Eritrea. In addition, over the next two months, more than 89,000 metric tons of  
14 processed commodities are scheduled to be loaded in Long Beach, California, Los Angeles,  
15 California and Seattle, Washington for shipment to Afghanistan, Cambodia, North Korea, Yemen,  
16 India, and other countries. Continued closure of West Coast ports will prevent or delay these  
17 important food aid shipments. In addition to combating hunger and malnutrition and promoting  
18 economic development overseas, these export programs benefit the United States by expanding  
19 international trade and markets for United States agricultural commodities, supporting farm prices  
20 and farmers' income, and furthering the foreign policy of the United States. By providing food  
21 assistance to meet humanitarian needs, the United States helps to stabilize foreign governments  
22 that are vital to our national security needs.

23 **(6) Logistical impacts**

24 19. The sheer volume of containers affected by the West Coast port closure is causing  
25 significant congestion problems. Each month, from October through December, approximately  
26 600,000 containers, each roughly the size of the container on an 18-wheel semi-truck, move  
27 through West Coast ports. Port facilities now have no ability to accept new outbound container  
28

1 shipments, and numerous inbound ships are being held at by unable to enter the ports, with more  
2 scheduled to arrive. If the contents of the containers are questionable with respect to quality,  
3 inspections are needed, and product may have to be unloaded once the work resumes. As the  
4 closure continues, the need to empty and repack containers will increase, and moving containers  
5 with deteriorated product to make room for new containers will become a logistical nightmare with  
6 substantial costs.

7         20. A few years ago, the U.S. farm economy experienced a disruption of transportation  
8 services that illustrates the implications of losing even one critical link in the overall transportation  
9 network. In 1997, a breakdown in rail service rippled throughout the U.S. agricultural sector.  
10 Subsequent to the Union Pacific railroad merger with the Southern Pacific railroad, congestion on  
11 rail lines and rail yards began in Houston, Texas. The congestion soon spread to include not only  
12 the entire Union Pacific rail system, but also to competing and connecting rail carriers, particularly  
13 in the Western United States and over the Mexican border. During the rail crisis, it was common  
14 for grain shippers to wait 60 and 90 days for delivery of rail cars, resulting in 96 million bushels of  
15 grain being stored on the ground because elevators could not ship the previous year's crops to  
16 make room for the new crops. The result was double handling costs (about 10 cents per bushel)  
17 and a loss in value due to grain deterioration and quality loss. The impacts of the Western rail  
18 crisis lasted for 18 months and resulted in increased transportation costs due to increased costs of  
19 truck transportation for many shippers and the loss of grain export markets to competing countries.

20         21. Like the Western rail crisis, the closure of West Coast ports is imposing heavy costs on  
21 shippers, both exporters and importers. Today's marketing system relies increasingly on just-in-  
22 time deliveries and supply-chain management to hold down costs and to minimize holding costly  
23 inventories. When part of that supply chain falters, the ripple effects are significant. Delays on  
24 inbound shipments of goods to the United States is also impairing the ability to efficiently move  
25 agricultural commodities destined for export on outbound ships.

26         22. Closure of West Coast ports has an immediate and serious impact on U.S. agricultural  
27 producers and related industries that will become worse over time. Today, closure of these ports is

1 causing farm products to back up throughout the marketing chain which is causing a sharp drop in  
2 the demand for these products at the farm level. This closure adversely affects farmers, livestock  
3 producers, marketers, shippers, processors and consumers.

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5 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
6 October 7, 2002, in the City of Washington, D.C.

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ANN M. VENEMAN

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**ATTACHMENT I – DECLARATION OF ANN M. VENEMAN**

**Containerized Imports For U.S. West Coast Ports, Average 2000–2001<sup>1</sup>**

October			November			December		
		Value			Value			Value
Bananas	1,621	\$7,541,133	Shrimp, prawns	1331	\$235,800,572	Bananas	1,806	\$25,287,076
Shrimp, prawns	1,218	\$205,626,484	Bananas	1191	\$7,012,866	Frozen Fish	1,172	\$88,145,221
Foodstuffs	1,115	\$87,216,990	Frozen Fish	1126	\$83,663,309	Shrimp, prawns	1,064	\$186,756,518
Frozen Fish	1,057	\$68,719,897	Foodstuffs	1087	\$94,834,061	Foodstuffs	1,151	\$170,074,093
Wine	948	\$43,222,850	Wine	868	\$39,275,828	Vegetables	713	\$28,559,363
Beer	738	\$3,856,391	Meat	713	\$49,997,401	Canned fish	729	\$56,667,971
Non-alcoholic Beverages	736	\$12,490,385	Non-alcoholic Beverages	709	\$11,750,089	Fruit	696	\$20,602,884
Meat	654	\$41,711,771	Rice	672	\$20,554,908	Rice	682	\$19,029,853
Canned pineapples	651	\$16,351,687	Beer	595	\$3,958,030	Wine	779	\$31,412,116
Canned fish	645	\$50,658,530	Canned fish	560	\$49,179,233	Non-alcoholic Beverages	770	\$15,921,881
Other	7,493	\$407,004,304	Other	7066	\$371,278,994	Other	8,302	\$527,420,358
Total	16,877	\$944,400,422	Total	15919	\$967,305,291	Total	17,863	\$1,169,877,334

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<sup>1</sup>Top 10 commodities based on imports during 2000–2001. Containers based on forty-foot equivalent units (FEU). Source: Port Import Export Reporting Service (PIERS), *Journal of Commerce*, New York, NY, 2000-2001

**ATTACHMENT II – DECLARATION OF ANN M. VENEMAN**

**Bulk & Breakbulk Imports from U.S. West Coast Ports, Average 2000–2001<sup>2</sup>**

October			November			December		
		Value			Value			Value
Bananas	46,743	\$17,173,074	Bananas	36,253	\$9,100,209	Foodstuffs	28,126	\$74,705,949
Molasses	47,871	\$9,492,100	Molasses	12,490	\$913,195	Bananas	44,739	\$12,745,657
Meat	2,083	\$3,830,289	Coconut Oil	11,033	\$6,503,562	Molasses	11,401	\$10,197,000
Fruit	1,689	\$4,141,531	Meat	3,212	\$5,066,850	Coconut Oil	5,750	\$5,996,000
Wine	112	\$196,627	Fruit	2,170	\$565,156	Meat	4,784	\$9,726,839
Frozen fish	26	\$162,181	Vegetables	18	\$18,211	Fruit	5,291	\$4,775,332
Animal Feed	17	\$18,173	Bread, Cereals	12	\$10,662	Cherries	336	\$271,820
Coffee	5	\$19,831	Animal Feed	12,345	\$4,160	Animal Feed	66	\$75,361
Total	98,546	\$35,033,806	Frozen Fish	42	\$8,960	Frozen fish	94	\$364,412
			Total	77,575	\$22,190,965	Other	5,782	\$19,801
						Total	106,369	\$118,878,171

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<sup>2</sup>Top commodities based on imports during 2000–2001. Source: Port Import Export Reporting Service (PIERS), *Journal of Commerce*, New York, NY, 2000-2001

**ATTACHMENT III – DECLARATION OF ANN M. VENEMAN**

**Bulk & Breakbulk Exports from U.S. West Coast Ports, Average 1999-2001<sup>3</sup>**

October			November			December		
Commodity	Quantity (metric tons)	Value	Commodity	Quantity (metric tons)	Value	Commodity	Quantity (metric tons)	Value
Bulk grains (wheat)	1,029,394	\$214,315,641	Bulk grains (wheat)	707,060	\$131,281,385	Bulk grains (wheat)	794,773	\$133,540,521
Soybeans and soybean product	358,955	\$99,003,316	Soybeans and soybean products	199,270	\$55,344,325	Soybean and soybean product	125,435	\$36,619,131
Tallow, grease	9,206	\$4,038,772	Grain products	76,976	\$10,722,677	Tallow, grease	7,406	\$3,508,843
Planting seed	4,180	\$2,775,243	Pulses, peas, corn	37,442	\$7,573,600	Fresh lemons	3,334	\$2,322,612
Fresh lemons	3,127	\$2,182,581	Rice	27,000	\$11,644,897	Fresh oranges	3,092	\$2,096,594
Fresh fruit (apples, pears)	1,189	\$599,610	Animal feed	9,593	\$1,784,171	Animal feed	3,025	\$893,423
Lard	300	\$742,504	Tallow, grease	9,410	\$4,616,444	Lard	1,419	\$791,686
Frozen fish	232	\$161,906	Fresh lemons	4,805	\$3,353,709	Fresh grapefruit	98	\$67,557
Fresh grapefruit	21	\$83,830	Tuna, not canned	1,385	\$868,993	Beef	74	\$288,253
Dairy/egg product	2,160	\$792,817	Frozen fish	1,018	\$2,201,801	Non alcoholic beverages	51	\$26,511
Other	45,190	\$21,778,207	Other	4,753	\$98,354	Other	6,347	\$3,130,174
<b>Total</b>	<b>1,453,953</b>	<b>\$346,474,426</b>	<b>Total</b>	<b>1,078,712</b>	<b>\$229,490,356</b>	<b>Total</b>	<b>945,054</b>	<b>\$183,285,304</b>

<sup>3</sup>Top 10 commodities based on exports during 1999–2001. Source: Port Import Export Reporting Service (PIERS), Journal of Commerce, New York, NY 1999–2001

**Declaration of Keith J. Collins  
ATTACHMENT IV**

**Containerized Exports for U.S. West Coast Ports, Average 1999-2001<sup>4</sup>**

October			November			December		
Commodities	Containers	Value (\$U.S.)	Commodities	Containers	Value (\$U.S.)	Commodities	Containers	Value (\$U.S.)
Animal feed (incl. hay)	10,303	\$68,247,341	Animal feed (incl. hay)	10,342	\$66,985,447	Animal feed (incl. hay)	9,962	\$78,273,793
Fruit (apples, grapes)	4,173	\$83,734,143	Fresh fruit (apples, grapes)	3,749	\$77,788,780	Cotton, raw/baled	3,608	\$193,384,835
Vegetables, fresh/frozen	3,621	\$75,499,475	Vegetables, frozen/fresh	3,664	\$66,598,646	Vegetables, fresh/frozen	3,135	\$52,446,943
Beef, pork, frozen/chilled	3,575	\$283,220,919	Beef, pork, frozen/chilled	3,577	\$279,491,200	Beef, pork, frozen/chilled	3,090	\$225,627,206
Grocery items/foodstuff	2,769	\$167,578,363	Cotton, raw/baled	2,892	\$91,213,451	Leather, hides	2,791	\$161,687,109
Leather, hides	2,649	\$150,951,185	Leather, hides	2,875	\$153,824,164	Fresh fruit (apples, grapes)	2,629	\$37,629,527
Edible nuts	2,232	\$147,513,700	Grocery items/foodstuff	2,755	\$173,926,401	Grocery items/foodstuff	2,288	\$142,041,689
Cotton, raw/baled	1,978	\$64,767,136	Soybean, soybean products	1,781	\$82,287,638	Soybean, soybean products	1,851	\$75,189,298
Onions, fresh	1,600	\$10,080,566	Poultry, frozen/chilled	1,590	\$42,867,489	Poultry, frozen/chilled	1,598	\$44,884,299
Poultry, frozen/fresh	1,532	\$38,359,166	Edible nuts	1,403	\$161,907,255	Edible nuts	1,382	\$104,849,178
Other	14,245	\$959,513,016	Other	13,381	\$716,680,622	Other	13,310	\$541,497,699
Total	48,676	\$2,049,465,010	Total	48,010	\$1,913,571,094	Total	45,644	\$1,657,511,576
% refrigerated	39%		% refrigerated	38%		% refrigerated	37%	

<sup>4</sup>Top 10 Commodities based on exports during 1999-2001. Source: Port Import Export Reporting Service (PIERS), *Journal of Commerce*, New York, NY, 1999-2001

