# Pension Fund Committee

Agenda Item:

15

## **Dorset County Council**



Date of Meeting	26 November 2015
Officer	Pension Fund Administrator
Subject of Report	Pensions Administration
Executive Summary	This report is the quarterly update for the Pension Fund Committee on all operational and administration matters relating to the Fund. It contains updates on the following:  • Public Sector Pension Reform  • Procurement of Administration Software  • Address Tracing and Mortality Screening Service  • End of Year Process  • Workflow and Key Performance Indicators  • LGPS National Insurance Database  • Backlog  • Guaranteed Minimum Pension (GMP) Reconciliation  • Communications  • Tell Us Once
Impact Assessment:	Equalities Impact Assessment: N/A
Please refer to the protocol for writing reports.	Use of Evidence:N/A
	Budget: N/A
	Risk Assessment:N/A

#### Page 2-Pensions Administration Report

	Other Implications: N/A
Recommendation	It is recommended that the Committee note and comment on the contents of the report.
Reason for Recommendation	To update the Committee on aspects of Pensions Administration
Appendices	<ul> <li>Appendix 1 – letter from the Pensions Regulator</li> <li>Appendix 2 – Barnett Waddingham response to consultation on the Exit Payment Cap</li> <li>Appendix 3 - Screening results summary April 2015</li> <li>Appendix 4 - Key Performance Indicators</li> </ul>
Background Papers	<ul> <li>The Public Service Pension Scheme (Amendment)         (Governance) Regulations 2015</li> <li>The Pensions Regulator's Code of Practice 14: Governance and Administration of public service pension schemes</li> <li>The Enterprise Bill</li> </ul>
Report Originator and Contact	Name: Anne Cheffey Tel: 01305 224025 Email: a.m.cheffey@dorsetcc.gov.uk

#### 1. Background

1.1 This report is the third of the quarterly update for the Pension Fund Committee on all operational and administration matters relating to the Fund.

#### 2. Public Sector Pension Reform

#### LGPS 2014

- 2.1 The production of Annual Benefit Illustrations for the Dorset Fund is almost complete with a very small group of members yet to receive them. As previously reported meeting this year's deadline has proven difficult for all LGPS funds, and as a result a letter was written to the Pensions regulator explaining the issues on behalf of the Local Government Association.
- 2.2 The Pensions Regulator has responded to representations from Jeff Houston, Head of Pensions, Local Government Association, and the time limit for issuing the Illustrations has been extended to 30 November 2015 (Appendix 1).

#### National Scheme Advisory Board

- 2.3 The Local Government Pension Scheme Advisory Board is a body required by Section 7of the Public Service Pensions Act 2013. It is established to advise Government inrespect of the LGPS, as well as to encourage best practice, increase transparency and coordinate technical and standards issues.
- 2.4Currently an Interim Board is in place, pending the Ministers' appointment of a Chair forthe new Board.
- 2.5 The Interim Board has written to all Chairs of LGPS Section 101 Pension Committees, along with Chief Executives, Chief Financial Officers and Councils to raise concernsabout the pressures currently faced by scheme managers in delivering their existing andincreasing regulatory responsibilities. The letter reminds Funds, and the administering authorities on their obligations to ensure that sufficient resources are maintained to deliver the function (as these costs are met by the Fund there should be no impact on the Administering Authority); and the requirement for increasing transparency and accuracy in Pension Fund accounting (including recharges).
- 2.6The Scheme Advisory Board have appointed KPMG to assist in developing and evaluating options for the greater separation between LGPS Funds and their host authorities for consideration, prior to potentially making recommendations to the Secretary of State.

#### Pooling of Investments

2.7 In his summer budget the Chancellor announced that the LGPS would be invited to bringforward proposals to invest collectively and deliver savings. The invitation will include the evaluation criteria that will be used to assess proposals, including the scale and size of pooled investments and the role of passive management an investment strategy.

- 2.8 Members will be aware of these proposals, and there is a separate report on today's agenda addressing this issue, and the work underway in the South West region to respond to Central Government.
  - HM Treasury consultation on a Public Sector Exit Cap
- 2.9 On 31 July HM Treasury published a Consultation on a Public Sector Exit Payment Cap. The proposal is for the introduction of a £95,000 limit on the total value of payments made in connection with the termination of a public sector worker's employment. It is proposed that this will include the early retirement strain cost arising in the LGPS ifthe member is taking early payment of benefits unreduced.
- 2.11 The changes, if implemented as proposed, would have a significant impact onemployees and employers, and also necessitate changes to the LGPS Regulations. For example, staff who would not normally be considered "high earners" could trigger thecap by being made redundant, and this may have knock-on effects on how a Councilimplements broader cost reduction strategies.
- 2.12 Barnett Waddingham responded to the Consultation and this can be seen in Appendix 2. As can be seen from the table in Appendix 2 the costs of unreduced early retirement pensions alone could exceed £95,000 in somecases.
- 2.13 The Governments response to the consultation can be viewed here:

  <a href="https://www.gov.uk/government/consultations/consultation-on-a-public-sector-exit-payment-cap">https://www.gov.uk/government/consultations/consultation-on-a-public-sector-exit-payment-cap</a>. The response is short on detail but confirms that the Government plan to proceed with the introduction of the cap. The cap will be implemented via the Enterprise Bill currently making its way through the House of Lords (now at the committee stage).

#### 3. Procurement of Administration Software

- 3.1 After completing our pre-procurement research, we are seeking clarification around the Terms and Conditions and pricing of services under alternative procurement options before finalising the best approach to the market.
- 3.2 We are working together with the Norfolk and Suffolk Pension Funds, and are being supported by Norfolk procurement and NPLaw for this exercise.

#### 4. Address Tracing and Mortality Screening Service

- 4.1 During the period 1 August 2015 to 31 October 2015, 83 pensioner deaths were identified with a 99.99% high confidence this is our member (validated against the name, date of birth and address). Plus another 30 which matched our member data to a lower degree, so required further verification by Payroll. The detailed data is shown in Appendix 3.
- 5. Workflow and Key Performance Indicator's

- 5.1 In July 2014, in collaboration with the London Pension's Fund Authority, a new electronic workflow system was introduced in the benefits area called CMS. We continue to work with the LPFA to improve the reporting capability to more accurately reflect the Fund's timescales and processes.
- 5.3 Appendix 4 shows the top ten KPI's for Septemberto October 2015. A full 3 months could not be reported due to the Committee meeting prior to the end of November.
- 5.4 Overall the performance has increased by approximately 13%, however performance on estimates and deaths has droppedin the last 2 monthsby around 1%. This is being discussed with Team Leaders with a view to identifying and addressing any issues, and improving performance.
- 5.5 Once the new structure is in place the appointed Team Managers will be charged with reviewing all processes and procedures to drive performance and efficiency.

#### 6. LGPS National Insurance database

6.1 As reported to Committee previously work is currently being undertaken by the Local Government Association to set up a National Insurance database for the LGPS. The Information Sharing Agreement has now been signed and returned to the LGA. The launch date for the database is the week beginning 9 November 2015, and we are still awaiting confirmation of the cost of participation.

#### 7. Backlog

- 7.1 A total of 225 cases have been cleared in September and October.
- 7.2 There are now a total of 1321 outstanding cases, compared to the 1546 reported at the last meeting.

#### 8. Guaranteed Minimum Pension (GMP) Reconciliation

- 8.1 The LPFA have now commenced the work on the initial stage of the data matching for the Dorset Fund. The Dorset Fund isstill waiting for national adviceconcerning the tolerances we can accept when comparing HMRC records to our own.
- 8.3 There is also the possibility that GMPs will not be taken into account when indexingpensions in the future.

#### 9. Changes to taxation of pensions savings and contracting out

- 9.1 The Lifetime Allowance (LTA) is the value of lifetime pension savings that can be paidbefore a further tax charge is levied. In his 2015 Budget, the Chancellor announced thatfrom April 2016 the LTA will be reduced to £1 million from £1.25 million, with transitional protection available.
- 9.2 From April 2018 the LTA will be indexed annually in line with the Consumer Prices Index(CPI). The Chancellor's speech also confirmed that no changes would be made to theAnnual Allowance, although Pension Input Periods are being aligned with tax years from July 2015.
- 9.3 Contracting out of the secondary state pension ceases in April 2016. This will impactboth scheme employers and scheme members as both employers and employeesNational Insurance Contributions will be payable at the (higher) contracted in rates.

#### 10. Extension of the 'Tell us once' service to the LGPS

- 10.1 'Tell Us Once' is a service that lets people report a death to most governmentorganisations in one go.Until now the service has not extended to occupational pension schemes (including theLGPS).
- 10.2 On behalf of LGPS Funds, the LGA sent the Department of Work and Pensions a letter of intent confirming that the LGPS in England, Wales and Scotland would like to be part of the service when this is extended to public service pension schemes. This service has now become available and the Dorset Fund will be participating.
- 10.3 A Data Sharing Agreement has been signed and returned to the DWP. We expect to start using this service in the next few months. This service coupled with the Mortality Screening should ensure even greater data capture and correct payment of pensions.

Richard Bates Pension Fund Administrator November 2015

# The Pensions Regulator

9 October 2015

Dear Jeff.

Thank you for outlining the issues faced by Local Government Pension Scheme (LGPS) funds for England and Wales in meeting the legislative deadline for providing annual benefit information statements to members.

The Pensions Regulator recognises the significance of the public service pension reforms, including the requirement to redesign benefits and new requirements about governance and administration.

We are aware that LGPS Funds, like all public service schemes, face a significant task in implementing the major reform of their benefit design, establishing new governance arrangements and putting in place systems to deal with the administration of the new and transitional arrangements while maintaining and integrating their legacy systems.

However, as you are aware, all public service schemes must be governed and administered in accordance with the requirements of the law. We therefore expect those involved in the governance and administration of public service schemes to comply with the law and strive to deliver good outcomes for members. It is vital that members are provided with information on their pension benefits so that they have a clear understanding of their financial position and can make informed decisions.

Where a legal duty relevant to the administration of the scheme has not been, or is not being complied with, certain people (including scheme managers, pension board members and those involved with administering the Funds) are under a duty to report breaches of the law to us if they consider that the breach is likely to be of material significance to us.

Some LGPS Funds have already contacted us to report a breach of the requirement to issue benefit information statements in accordance with the deadline stipulated in the Public Service Pensions Act 2013 (31 August 2015). Where the cause of the breach is explained as being due to significant data and IT system issues faced by Funds and Fund employers, we are minded to advise those Funds that we expect them to issue the statements as soon as possible and by the 30 November 2015 at the latest. As a matter of best practice, we also expect LGPS funds to take steps to inform affected members of the delay and when they can expect to receive their benefit statement.

Where these Funds are unable to meet this timeframe, they will need to provide us with further information, including their plan of action for remedying the breach. Plans will be considered on a case by case basis and we will consider what action to take if satisfactory plans are not in place.

Napier House Trafalgar Place Brighton BN1 4DW Customer support: 0845 600 0707

Email: <a href="mailto:customersupport@tpr.gov.uk">customersupport@tpr.gov.uk</a>
Website: <a href="mailto:www.thepensionsregulator.gov.uk">www.thepensionsregulator.gov.uk</a>

# The Pensions Regulator

However, where the breach arises for other reasons, or in conjunction with other issues, we will consider whether a different response is appropriate in accordance with our Compliance and Enforcement Policy.

Where other Funds are in breach of the requirement and have not yet considered whether or not the breach must be reported to us, scheme managers, pension board members and those involved with administering the Funds will need to consider whether they must do so, whether or not they anticipate that benefit information statements will be issued by 30 November 2015.

Our Public Service Code of practice provides guidance on judging whether a breach needs to be reported, and if so, how to report a breach of law, and our compliance and enforcement strategy outlines our approach in response to any breach that is reported to us or of which we otherwise become aware.

If LGPS Funds decide that they need to report to us, they should explain the reasons for the breach occurring and their plan to remedy it, including the timeframe, which we will take into account in determining our response.

We would welcome the opportunity to engage with you further in relation to public service pensions schemes and to better understand how LGPS funds are addressing issues they face in complying with the legal requirements. Please do not hesitate to contact me if you wish to arrange.

Yours Sincerely Joey

Joey Patel Policy Lead Public Service Pensions Regulation Team

### **Appendix 2**

#### Response to Exit Payment Cap Consultation by Barnett Waddingham

Barnett Waddingham is an independent partnership of consulting actuaries with 7 offices across the UK. We have 63 partners and over 700 staff. We advise over 600 pension schemes including 23 Local Government Pension Scheme Funds ("LGPS Funds") which is around 25% of all LGPS Funds. We also advise a number of organisations that participate in the LGPS or other public service schemes.

Our response is primarily on the proposal to include early retirement pension costs into the cap.

Question 1: What other forms of exit costs do you think are relevant in this context?

We are not aware of any others.

Question 2: Do you agree that the government should introduce a cap on the value of public sector exit payments on the basis set out above?

Question 3: Do you agree that the payments listed above should be subject to a cap on exit payments under the terms set out above? If you believe certain payment types should be excluded please provide a rationale and examples.

We shall answer Q2 and Q3 as one.

We know the Government is looking to reduce costs further across the public sector which will inevitably mean a further reduction in headcount. The imposition of a cap including early retirement pension costs will make this more difficult to achieve for public sector employers as the useful early retirement tool for over 55s may no longer be available in all cases, particularly for the higher paid who will help make the biggest savings. This could lead to a change in the workforce profile with a much larger proportion of older expensive staff who make not always be the best "value for money".

The legislation governing many public sector funds would need to be amended as at the moment those being made redundant or retired on efficiency grounds, usually over the age of 55, may be entitled to these unreduced early retirement benefits. Alternatively the rules could be changed so that if these employees on exit did exceed the cap then their benefits could be reduced (but perhaps not a full reduction) so employers could still manage down the workforce as part of the required cost reduction.

Alternatively we would perhaps suggest a modified approach which had maybe a "cash cap" and a "pensions cap" where in aggregate this may be more than £95k but had a lower cash element – say £50k. The rationale for this is that the early retirement pension costs are only the present day value of the costs that would arise if the employee concerned lives to their assumed life expectancy as well as some other assumptions being borne out in practice. If they die before then (50% chance assuming the life expectancy assumptions prove to be correct) they will not have cost as much as the cost calculation. Equally of course they may live beyond their life expectancy (another 50% chance). Given the uncertainty as to whether the strain costs will in fact be the actual costs it may be more acceptable to only include a proportion of the calculated strain costs or have a higher pensions cap. This would still of course require changes to the legislation governing pubic service pension schemes.

Alternatively exclude early retirement pension costs from the cap altogether and have a lower cash only cap.

#### Question 4: Are there further payments that the government should include?

None that we are aware of.

Question 5: Do you agree that a cap on exit payments should be set at £95,000? If you think an alternative level would be more appropriate, please provide evidence and analysis to support your proposal.

As already indicated this could have unintended consequences if early retirement pension costs are included. Below we have set out an example of the sorts of costs or numbers that would be included in the cap, that would arise in the Local Government Pension Scheme for a 55 year old receiving unreduced benefits.

	Pay									
Service Yrs	£10,000	£15,000	£20,000	£25,000	£30,000	£40,000	£50,000	£75,000	£100,000	£150,000
2	£2,864	£4,295	£5,727	£7,159	£8,591	£11,454	£14,318	£21,477	£28,636	£42,954
5	£6,334	£9,501	£12,668	£15,835	£19,002	£25,336	£31,670	£47,505	£63,340	£95,010
10	£11,235	£16,852	£22,470	£28,087	£33,704	£44,939	£56,174	£84,261	£112,348	£168,521
15	£14,561	£21,841	£29,122	£36,402	£43,682	£58,243	£72,804	£109,206	£145,608	£218,412

20	£15,563	£23,344	£31,126	£38,907	£46,688	£62,251	£77,814	£116,721	£155,628	£233,442
25	£17,904	£26,857	£35,809	£44,761	£53,713	£71,618	£89,522	£134,283	£179,044	£268,566
 30	£20,246	£30,369	£40,492	£50,615	£60,738	£80,984	£101,230	£151,845	£202,460	£303,690
35	£22,588	£33,881	£45,175	£56,469	£67,763	£90,350	£112,938	£169,407	£225,876	£338,814

As they will also be entitled to cash redundancy payments then there will of course be less than £95k left to absorb any early retirement pension costs. So in practice there could be the potential for a basic rate tax payer (albeit at the top end) with a long career in public service to have a cash cost and pension cost in aggregate in excess of the £95k cap – is this the intention?

#### Question 6: Are there other ways to ensure such arrangements are consistent with the cap on lump sum payments?

See response to Q2/3.

# Question 7: Do you agree with the proposed approach of limiting early retirement benefits with reference to the cost for the employer? What alternative approaches would you suggest and why?

Our response to Q3 also refers. In addition, the calculation of the early retirement pension cost is an issue that would need to be resolved as there are different ways of calculating this for different purposes – in the LGPS, Funds already recognise these costs but on bases consistent with assumptions underlying the calculation of employer contribution rates and so will reflect different investment and funding strategies, longevity etc. So it will vary amongst Funds. As far as we are aware no such calculations are completed in the unfunded schemes so a question would be should the calculation basis reflect "local" issues or should it be the same basis for all public service schemes?

#### Question 8: Do you agree that the government has established the correct scope for the implementation of this policy?

Excluding quasi-public sector employers who may still ultimately be funded in the main by tax payers is likely to provoke some accusations of whether the policy is "fair".

Question 9: How do you think the government should approach the question of employees who are subject to different capping and recovery provisions under TUPE rules following a transfer to (or from) the private sector and whether there should be consistency with public sector employees in general?

Again the lack of a level playing field is likely to question the fairness of what is being proposed. Those private sector employers who have inherited these potential liabilities however may welcome such a level playing field.

#### Question 10: Do you agree with the proposed approach for waivers to the cap on exit payments?

Our response to Q2/3 refers – this proposal does seem to be at odds with the expectation that public sector employers will have to re-organise to meet cost reduction targets and so some form of waiver in these circumstances does seem appropriate.

# Question 11: Are there other impacts not covered above which you would highlight in relation to the proposals in this consultation document?

None that we can think of.

Question 12: Are you able to provide information and data in relation to the impacts set out above?

No but see the table included in our response to Q5.



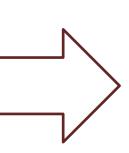


Mortality Screening: Deceased Project Summary Report -

On the supplied spread sheet, the data from the column 'A' to the column entitled 'Post Code' represent the original details provided.

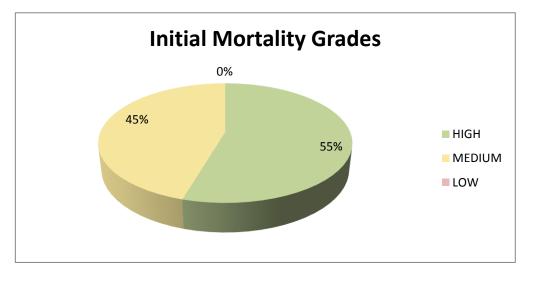
All data after this column has been provided by Target.

The column headings in the Target data have the following meanings:



Title	Explanation
Matched forename / Surname	Names matched against Date of Birth (where date of birth is supplied).
Matched DoB	DOB matched against names & death details
Initial Mortality Grade	Grading of deaths found (see below)
GRO Reference	Records office reference number. This is important if a death certificate
	required.
Date of Death	Registered Date of Death
Matched address lines	Address registered at death
Final Mortality Grade	All reported deaths given medium or low grades are manually verified by
	the Target trace team and either upgraded or downgraded accordingly.

GRADING	Initial	Comments
	matches	
		There is a 99.99% high confidence this is the member,
		validated against the name, date of birth and address -
HIGH	24	all match;
		There is a good chance this is the member e.g. the
		name and date of birth match but the address does
		not. The member may have moved from the provided
MEDIUM	20	address and since died;
		Only some of these will be your member e.g. there are
		differences in the date of birth and address. Regularly
		these are where the data contains typo's and needs
LOW	0	further investigation.
ΤΟΤΔΙ	44	

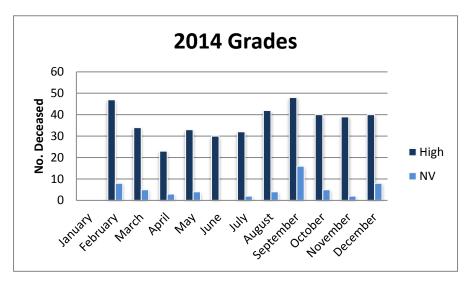


To reduce volume of false matches, Target manually investigate all initial **Low** or **Medium** grade matches. This involves evidentiary searches for member existence, links between member and location or death addresses, and dismissal of unconnected persons sharing member name and date of birth. Verified matches are graded as **High**. Matches not confirmed as your member are graded **Negative** and removed from final spread sheet report. Investigated data that suggests, but cannot confirm high match possibility will result in a **Needs Verification** grade. To further improve our service the investigated data that suggests, but cannot exclude the match as your member will result in a **Low Match** grade. This LM grade is particularly useful when key data has not been made available for screening.

This is the most accurate mortality screening available.

#### Grades and statistics following Target manual investigation of Medium & Low Grades





FINAL RESULT	ΓS				MANU.	AL RES	ULTS					professional services			
					M	M	M	M	*M	L	L	L	L	*L	
2014	High	NV	LM	Total	Total	High	NV	LM	Neg	Total	High	NV	LM	Neg	
January															
February	47	8		55	26	9	7		10	177	1	1		175	
March	34	5		39	8	3	5		0	3	0	0		3	
April	23	3		26	8	3	3		0	1	1	0		0	
May	33	4		37	10	6	4		0	0	0	0		0	
June	30	0		30	3	3	0		0	0	0	0		0	
July	32	2		34	5	3	2		0	0	0	0		0	
August	42	4		46	12	8	4		0	1	1	0		0	
September	48	16		64	20	3	17		0	4	4	0		0	
October	40	5		45	13	9	4		0	1	0	1		0	
November	39	2		41	7	5	2		0	3	0	0		3	
December	40	8		48	12	4	8		0	1	1	0		0	
TOTAL	408	57	0	465	124	56	56	0	10	191	8	2	0	181	

Identifies changes to results following manual investigation
\*Negative results proven to not be your member

	2015 Grades	
60		
50		
40		
30		
20		■ High
10	-11-11-11-1 <sub>1</sub> -11-1 <sub>1</sub> -1 <sub>1</sub> -1 <sub>1</sub> -1 <sub>1</sub> -1	NV
0		
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	50 40 30 20 10	60 50 40 30 20 10

FINAL RESUL	ΓS				MANU.	AL RES	SULTS							
					M	M	M	M	*M	L	L	L	L	*L
2015	High	NV	LM	Total	Total	High	NV	LM	Neg	Total	High	NV	LM	Neg
January	41	12	1	54	15	2	12	1	0	0	0	0	0	0
February	38	13	0	51	18	5	13	0	0	1	0	0	0	1
March	24	14	0	38	16	3	13	0	0	0	0	0	0	0
April	51	20	0	71	16	5	11	0	0	76	0	0	0	76
May	35	10	1	46	7	3	3	1	0	0	0	0	0	0
June	23	14	0	37	17	3	14	0	0	0	0	0	0	0
July	27	2	0	29	6	4	2	0	0	0	0	0	0	0
August	27	11	0	38	12	2	10	0	0	1	0	1	0	0
September	25	6	0	31	11	5	6	0	0	0	0	0	0	0
October	31	13	0	44	20	7	13	0	0	0	0	0	0	0
November														
December														
TOTAL	322	115	2	439	138	39	97	2	0	78	0	1	0	77

Identifies changes to results following manual investigation

<sup>\*</sup>Negative results proven to not be your member

#### **Dorset Council KPI Report - CMS stats**

Performance 2015/16 - report for period : 1/9/2015 to 31/10/2015

LPFA your pension our world

Number of complaints received #VAI	LUE!
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	Completed in	Sept-Oct	Last quarter	KPI	completed on time or early
Top 10 detail - cases completed on time	period	Performance	Performance	(days)	
Admissions (DR01 & DR01W)	981	93.07%	75.93%	30	913
Transfers In Quote (DR02E, DR02R, DR03E & DR03R )	107	75.70%	71.29%	15	81
Transfers In Actual (DR02A & DR03A)	24	0.00%	0.00%	20	0
Transfers Out (DR09E & DR10E)	66	45.45%	56.34%	10	30
Transfers Out actual (DR09A & DR10A)	26	38.46%	40.00%	10	10
Estimates Employee (DR08)	137	58.39%	59.65%	15	80
Estimates Employer (DR22R & DR22W)	214	82.24%	51.63%	15	176
Retirements (DR14, DR14W & DR12 & DR12I & DR14I)	410	74.88%	66.54%	5	307
Deferred Benefits (DR11 & DR11W)	336	51.49%	48.95%	40	173
Refunds (DR16 & DR16W)	237	80.17%	65.82%	15	190
Deaths (DR20, DR13 & DR13W)	93	64.52%	65.49%	5	60
Correspondence (DR24)	430	84.19%	65.64%	30	362
Total	3061	77.82%	64.39%		2382

	2014	-15		
Top 10 detail - Average elapsed time for cases completed within 6 months of receipt	Total cases	Average elapsed time	Average elapsed time	Target
Admissions (DR01 & DR01W)	788	17	18	10

107	49	75	64
24	80	61	64
66	54	44	23
26	36	50	23
137	27	30	10
214	16	19	9
410	51	49	53
281	40	39	53
129	77	66	53
336	74	70	23
237	57	70	28
87	17	26	44
875	6	9	2
	24 66 26 137 214 410 281 129 336 237 87	24     80       66     54       26     36       137     27       214     16       410     51       281     40       129     77       336     74       237     57       87     17	24     80     61       66     54     44       26     36     50       137     27     30       214     16     19       410     51     49       281     40     39       129     77     66       336     74     70       237     57     70       87     17     26