

## Hartford County ROVAC Minutes - June 14, 2016

Chairperson Darlene Burrell called the meeting to order at 9:30 am, and thanked our hosts, Marie Fox and Linda Cultrera for providing us with a central meeting space.

The agenda was distributed, and included a breakdown of which towns in Hartford County are served by the three Regional Election Monitors (the Connecticut Councils of Government are divided in regions that do not match the county divisions).

The calendar of Hartford ROVAC county meetings was discussed, and we will continue to meet on the second Tuesdays of January, March, June and September. For the next year we will meet at 9:30 am on September 13th, January 10th, March 14th and June 13th in Newington.

**Secretary Report by Laura Wolfe** - The September 2015 and January 2016 minutes were emailed to the membership. Motion to accept the minutes was made by Kevin McCauley and seconded by Zettie Shookus, the motion passed unanimously. March 2016 minutes were sent yesterday, and still need to be edited by Darlene before sending them out.

**Treasurer's Report by Sue Burnham** - Thank you to all who contributed and helped with the Hartford County basket for the Spring ROVAC Conference Hartford County Raffle Basket. There were geraniums, a spring theme and some nice wine. Enough money was collected to cover the costs this year.

**Audit Committee Report by Chairperson Lizbeth Becker** - No report, but the committee will be meeting in June.

**Convention Committee by Ann Clark** - The Fall Convention is on September 22 and 23, 2016 in Southbury, and the spring 2017 convention will be in Groton, April 19, 20 and 21. The last conference went well, but there wasn't much feedback.

Q. Are any towns questioning or cutting back on the days they will participate if the SOTS continues to hold separate events.

A. The committee has not heard this. Although we aren't sure, ROVAC will continue to book conferences with room for SOTS team to return. Unfortunately, we don't have any answers now, and the SOTS could surprise us at the last minute. Perhaps the Regional Monitors can help us, as they are liaisons to the SOTS.

Q. Our town is freezing our budget so extra convention days will not be covered.

A. You are obligated to get the training by statute, regardless of your town budget. You are an elected official and this is your responsibility. Hopefully the loophole that implies 18 hours per year will be corrected to the intended change from 10 hours to 8 hours per year (not both). The certification classes count, so this should not be an issue this year.

Q. UConn CITI classes at Avery Point were cancelled again on short notice.

A. The trainer is not automatically renewed, and the staff is looking for multiple trainers. It is up to us to keep checking their website and currently we need to be done and certified by July 1, 2017. There is some talk of allowing an extension. Currently no Section 1 and 2 classes are being offered, and they are a prerequisite for taking the other sections. We need to remove that requirement.

Q. Since the State has hired Regional Election Monitors, can they be trainers for certification?

A. They are here today and will answer your concerns - they are here to help us.

Q. Most of us would like to take classes this summer but the limited availability is making taking the classes very difficult. Emergency management classes are computer based, colleges teach their courses over the internet, why can't we do web based training?

A. We can bring it up with the chair of the Certification Committee.

Q. We have another issue, the classes in Torrington have been cancelled.

A. The campus is permanently closed.

Q. Why can't they videotape the lectures? It would reduce the cost and streamline the program.

A. We can discuss this with the committee. There is a plan to open these classes to others, since the signups are not going as expected.

Q. Why can't we take multiple classes, given how far we have to travel to get to them?

A. We will also bring this suggestion. Originally you had to pass a course to take the next one, and there was a delay in getting the results of the quiz. Now results should be received within a day.

Q. Can they extend the June 30, 2017 deadline to complete certification?

A. Yes, ROVAC plans to have the legislative committee work on it.

**Credentials Committee by Anita Mips - No Meeting - No Report.**

**Education Committee by Sharon Krawiecki - No meetings for the fall conference yet. We need suggestions. Topics suggested: EDR, absentee ballots, specifically overseas rules, military and blank ballot rules. (Some Registrars questioned a class focused on absentees, but we need to know how to receive, sort and count them.) Federal post card applications, what are the rules now that the form as changed to from "no intent to return" to "return is uncertain". EMS needs to be covered but SOTS needs to do this with laptops.**

Q. What about having certification classes at the conference?

A. No, last time we asked SOTS we didn't even get a response.

Tim DeCarlo has made a request to hold a mock election for all towns to test the EMS to Melissa, the Board and SOTS. Ted and Peggy are holding a by invitation only session to discuss EMS, and Darlene will be attending. Please send her any thoughts or ideas to share at that meeting.

Q. Why were entering provisional results not discussed in training? We need to receive instructions specific to entering the days after the election for amending returns.

A. SOTS is aware of the logging problems that moderators had for amendments. Do not worry about whether the SOTS website has "official" next to your results. They may take weeks to determine this. If your results are correctly posted there is no other need for your head moderator to take further action.

Q. Our town used tabs for Registrar and Head Moderator to enter the information on one computer - which then caused a glitch where we were in the wrong database, looking at another town's data when we switched to the other tab. Has this been fixed?

A. Yes, SOTS is aware of this glitch, and the current direction is to never use tabs on one computer to switch from Head Moderator to Registrar - logout when switching.

Q. We were told that "cookies" need to be changed to help fix these issues, is this going to be part of the training?

A. Yes, we expect this to be addressed.

Q. We had a district's results zeroed out, which we didn't notice until after the Head Moderator certified our results. We had to enter the district's information as an amendment after Shirley unlocked the results.

A. Please remember the primary was a test of the system, not a mandate. Updates and fixes are being implemented to address these issues.

Q. We would like to see a mock election soon, not the month before the Election when we will all be very busy with preparations. Also could there be two tests one for those with multiple districts and one for single polling place towns to address their different issues?. Could we have an open test site?

A. What can be done is limited by the state budget, they are likely to do a one size fits all test.

Q. There were serious issues with the absentee ballot data for central counting, no option to separately enter the data by district. We were told to just pick one district to enter the information. Will this be fixed?

A. We did ask the vendor at our training session about this, and they implied the State would have to pay extra to get the ability to enter this information properly and to be able to print blank sheets for the moderators to use.

Q. Our moderators had an issue with entering interim results, they were not comfortable with posting partial results on the state's website. We sent all of our results at 11:45 pm. Can we get more information and training for our moderators, so that they will be comfortable entering the tape results immediately?

A. As we have discussed, we need to run a test or mock election so that everyone can get comfortable using this new system.

Q. We had an absentee entry problem, we were told to put all of our information into one district. It looks like EDR will be the same one district entry in November. This is not helpful.

A. Apparently they are aware that some towns use districts for data entry that are not available in EMS, but they may not be able to fix this issue for November.

Q. If all towns received the same mock election packet, then SOTS could see which towns are having issues with data entry that need to be addressed before November. We have 7 districts, but 4 ballots for November, one place to enter data will not work for us.

A. We will put this request in.

Q. Why is the "local" district option which exists in CVRS not available for data entry? We had to enter both districts as District 1 for the primary - which makes it look like we didn't let District 2 vote.

A. We will discuss this with the SOTS and at a minimum get directions on how to work around this issue.

**Legislative Committee by Pete Gostin, Lisbeth Becker and Chairperson Sue Larson.** Overall it was a good session for us. Four bills passed: 1) SB 251 change requires Municipal Election results reporting to be the same as Federal Election reporting. Note this is just for elections. 2) The Saturday mandatory voter registration sessions have been eliminated. 3) The Act Concerning Election Administration concerns the DMV online voter registration system, now the deadlines will be consistent with mail-in. 4) An Act Concerning Post Election Audits has reduced the number of towns randomly audited from 10% to 5%.

SOTS has signed a memo of agreement for automatic voter registration with the new Commissioner at the DMV. Proposed automatic voter registration of all Connecticut drivers and ID holders who are otherwise eligible. The legislature is not happy with this SOTS work around, they expect automatic voter registration to be a legislative matter. The last acting DMV Commissioner was totally against taking this on, as there are too

many issues that need to be resolved first. This is a reaction to the DOJ investigation, the issue is that this should have been handled legislatively, not through a memo of understanding.

Other issues we are considering for the next session: Resolving the 18 hours of training that is currently on the books. In statute the 10 hours mandated from the SOTS training group doesn't exist, it was never established. SOTS is looking to get this eliminated. Our training bill did not pass; we want to ensure that ROVAC training will be included in training hours required. Currently SOTS led training is the only training that counts towards mandated eight hours. We are hoping to re-establish our working relationship and have our training, as well as SEEC, OPA, etc. training be part of our annual training. To be clear, certification classes and moderator certification classes count and the 8-hour mandate of SOTS training doesn't kick in until you need it to maintain your Registrar certification.

Q. We did not get updates from the lobbyist this year on the legislation. In March didn't we discuss that they would be coming regularly?

A. Unfortunately, the new format didn't allow Darlene to send them with her other county information. Sue will try to find a work around. Please send ideas for the long session to Sue, this our opportunity to change, correct and update statutes.

Q. Can we eliminate the SOTS required certification for Electronic Pollbooks? It has been years since we started using these, and duplicating with paper lists seems wasteful, but it is still illegal to use them as a standalone check-in system.

A. Not likely to be eliminated. If the SOTS certifies a system, they will likely choose a non-web based system - they are currently looking at a \$6000 system. The legislature would be very hard to convince that certification shouldn't apply. We are in the same position with the audit machine, we are still waiting for certification - this should have been done years ago, but both are being held up by UConn. There is no expectation that we can remove either certification requirement legislatively.

Q. Is there any chance the Governor will intervene and allow less polling places for a very poorly attended Republican August Primary?

A. We will need to check this out, to see if it is possible. The Governor did make an emergency change to the Voter Registration deadlines when we had that terrible storm a few years ago.

Q. We have heard rumors that the IVS system will be replaced for the Presidential, have you heard anything?

A. We are still waiting for certification of an accessible voting system, but we did hear that the RFP went out and IVS and Clear Ballot are two of the four or five vendors that applied. UConn seems to be the stumbling block for this certification as well. Don't count on the equipment until it is delivered.

Q. We had an issue with IVS at a polling place, one of our voters called Peggy about the lack of a test fax. Peggy thought they were sent out, (despite Tammy very clearly explaining at our Fall conference that there would no longer be a test fax). Did other towns get the test fax?

A. No, you were correct, the test fax was eliminated. You can test it before but during the election they want to be able to accurately check who is using the system to vote. The early morning blast confused the actual usage statistics and has been eliminated.

**Nominating Committee by Bob Sherman** - No meeting, no report.

**Hartford County Nominations for Officers were held for FY2017.** No new nominations for officers, slate of incumbent Hartford County officers Chairperson Darlene Burrell, Vice-Chair Sharon Krawiecki, Secretary Laura Wolfe, Treasurer Sue Burnham were approved unanimously.

**Hartford County Appointments were made for Committee Representatives for FY2017:**

Audit committee - elected position, no action

Convention Committee - Ann Clark, Subs Linda Cultrera and Laura Wolfe

Credentials Committee - Anita Mips

Education Committee - Sharon Krawiecki, Subs Camille Mogelnicki and Kevin McCauley

Nominating Committee - Open (Bob Sherman stepped down after many years of dedicated service.) Bob described the job as an easy committee, only 1 or 2 meetings at the end of the year, as they need to find officers for the Spring Convention. The chairperson determines the location, day and time. (Note: After the meeting Charlie Murray volunteered.)

Technology Committee - Ann Kilby and Lizbeth Becker.

Ways and Means Committee Report - Sue Burnham

Adhoc Handbook Committee Report - Darlene Burrell and Sharon Krawiecki Darlene reminded us that this committee is always needed in order cover legislative and technical changes. They are also interested in adding a list of tips to help make registrars' job easier.

**Technology Committee by Ann Kilby and Lizbeth Becker** - We had a meeting on St Patrick's Day. Ted spoke to the committee about what SOTS is working on, especially EMS. Liz and Ann are trying to set an agenda, and get the chair, Matt Waggner, to call a meeting - with limited success.

Q. When our bylaws changed we dismissed the idea that the Tech chair was the liaison with the SOTS. But Matt seems to be the liaison instead of the board. Are temporary committee changes appointed by the President?

A. Yes, the temporary chair is appointed.

Q. We have been trying to pay ROAST, but we can not get a W-9 from Matt. Is ROAST dissolved? We received our canvass materials, but our finance department will not send payment without a W-9.

A. No, we are receiving canvass materials - but the promised calendar did not get sent this year. Perhaps the W-9 was sent with the canvass files as an additional attachment. Should ROAST dissolve, a few towns are still using Lorton Data and there are other canvass options whom we might be able to negotiate a bulk price.

**Ways and Means Committee Report by Sue Burnham** - We did very well at the Spring Conference raising money with the raffles. We will meet again in late summer to plan the fall conference fundraisers. Last year we did a few baskets and a daily 50/50, and they were well received. Please send Sue ideas.

**Handbook Committee Report by Darlene Burrell and Sharon Krawiecki** - We are working on getting in the 2016 legislative changes into the Handbook. The update will be emailed when it is done. We noticed that the ROVAC website had an old 2014 version of the handbook. That has been updated. Erin Nash is now handling the ROVAC website and it is filled with updates including minutes from County meetings. Please check out all of the changes. ROVAC is looking for county help with the website, if anyone would like to volunteer.

The ROVAC website has a new master contact list for all counties. Any changes or updates can be sent to County chairs who will send them to Kevin McCauley, to put on the website on a daily basis. Thank you for the updates, requests and information. Please start using the website. The list of Registrars is very helpful; it is a great tool.

**Old Business** - County meetings on the second Tuesdays in Newington needs to be booked, Linda Cultrera will check on the dates chosen - Sept 13, Jan 10, Mar 14 and June 13.

Q. Who puts together the Out of State list for sending cancellations? The list on the SOTS website is very out of date.

- A. SOTS staff are in charge of the list. A work around is to do a quick web search with the state's name and Secretary of State, as all states have websites with contact information.

**New Business** - none reported.

**Guest Speakers: Regional Elections Monitors, Carol Mulready of the Capitol Region Council of Government and Jon Fitzgerald of the Naugatuck Valley Council of Government**

Most of Hartford County towns are in Carol's region, except for Bristol, which is part of Jon's region. Hartland and Burlington are part of Lila Tuxbury's region.

What is the job of Regional Election Monitor? We are here to help. One of the most interesting things is that we are not working for the SOTS, however they rule everything. Our job descriptions were posted in the fall and we began this year. Our job is to ensure that moderators know election law, interpret complex legislative language, and be able to interact with others in a positive way. Our duties and responsibilities include coordinate regional instruction sessions of moderator and alternate moderator certification training. There are not many people that can do that, we can't do the training, only organize the training sessions. This is the primary job. Starkey, the major proponent of this role, his vision was to get more classes available to get more moderators trained. But you have only four trainers currently in the state. State statute requires that the certified trainers must be Registrars, so if any of you are interested, or you know of anyone who is interested, please consider it. You know the process; you can best train your moderators.

Our job is to set up additional sessions. My hope is when I get all of the emails for Hartford County Registrars, I am hoping to hold regional sessions with neighboring towns and find dates that work with our four trainers. Our other job is to communicate with Registrars "to the extent permitted by law". Nobody is quite clear how to interpret that. And to be available for preparations for any elections, primaries, recanvass or audits. There are relevant statutes - 9-230 and Public Act 15 - 15, Sections 442-444. The memorandum of understanding that was made between the Secretary of State and the Councils of Governments makes the COGs the supervisors of the election monitors. So each COG person in charge makes sure that each monitor fulfills their requirements.

I had an opportunity with my supervisor to meet with Ted Bromley and Lewis Button to discuss our role. We asked if I could visit each town and meet with all of the Registrars in my region. They said no, there is no budget for that, mileage is not included, just a small stipend. Scheduling the moderator classes is difficult, given how far apart the towns are and not all towns have a space to offer the training. I am going to need your help, please let me know if you have space that can accommodate a moderator class in your town. We need a space big enough for 15 up to 25 students, a screen for the PowerPoint presentation, and an audio system, for this training.

The regional monitors got together for a meeting and we noticed that the SOTS moderator list has not been updated since January, but it looks like there is a huge need according to that list. Our role is really very limited, but any way we can help you we will try. One thing that did come up with the conversations we had with Ted and Lewis is that election monitors are not policemen, we are not here to police what you are doing. We are just supposed to be an extra helping hand. Ted mentioned if we see something that isn't working well, we are to let SOTS know. From what we have heard today, you folks have a lot of things that are not working well. Hopefully we will be another voice and maybe we can get the ear of the SOTS to address your questions and your concerns. Hopefully we can get a list of all the Registrars, if you send me an email that would be helpful.

Jon had a phone conversation with Peggy Reeves and with my COG rep when I first got hired. She made it clear that this legislation (that created Regional Election Monitors) did not come from the SOTS office, they were as surprised by this as you are, and we are. They don't really know what our position means either, nor did they seem inclined to meet with us. So it is not just you that they don't want to talk with. Lila, has been coordinating meetings with all of the Regional Election Monitors. We are not getting a lot of direction.

We are here to help you. We are not here to supervise or police you. If there is something you want us to take to the SOTS, we are happy to do that. We are here as a resource and will try to be helpful to you.

This legislation was done in the short session at the last minute, and it is unfortunate that so many problems that generated this kind of response that (our role) doesn't have as much definition as it should and as much help as it should.

Q. Currently town Registrars go directly to the trainers to organize moderator classes. Can you help us with the UConn Registrar certification program classes?

A. We need to take two of those classes as well. I was signed up to take a class tomorrow and it was cancelled. We are required to not just take the two classes, but also get certified as moderators. I did not know there was an issue with instructors. We got the same response that you did - just keep trying, and maybe you will be able to sign up. The monitors discussed this and thought that perhaps there aren't enough people signing up. We emailed each other to take the course on the same day, in order to make it happen. One of the monitors said for \$200 per student, they could run the course with one student.

Q. Could you organize the Hartford County Registrars, because we are a big group with many people who need to take the training? Could you pick the dates, location and make those classes happen?

A. I don't know if we can pick dates, but we can certainly inquire through the SOTS and Stamford. If they don't have a trainer in place, our first job is to make sure that happens. We need to ensure there is someone in the works, or the same person can continue.

Q. They have the current trainer until the end of June. You just told us that Section 4 was cancelled, Section 5 and 6 are still scheduled. Section 6 has more than enough people signed up, so it should be held.

A. I can make a call and find out what is happening.

Q. We were told that you need to complete the first four classes in order before taking the other classes, is that still true?

A. No, not according to what we have been told. Does a sequence make sense to you, because it doesn't look like it should matter? Looking through the lists of classes, there is some overlap, but most of them seem like they are independent material.

Q. Can you ask about offering a video or online option?

A. We can ask about a video or online option for training. Since all of these classes are about elections where do they find the person with the expertise to teach it. These are serious education issue. A political-science professor seems to be their intent. Perhaps their intent was to have an interactive class of shared knowledge. Different people from different aspects can make a better class.

Q. The SOTS needs to recognize you are a legitimate entity in this process. You should have some voice, based on that.

A. We might be able to get better access, but we are aware that the SOTS is somewhat understaffed. Software problems with Elections, or DMV, or reporting night we are not equipped for that role. 1:36

Q. Why might a Registrar want to call you? What do you envision would be something we should be contacting you for?

A. Our primary thing was to help you get your moderators trained. When I signed up as a Regional Monitor, I thought with my teacher background, I might help with the training, but I cannot be a trainer - not an option. Perhaps our role is to be another voice to go to the SOTS office, to absorb some of the issues discussed here today. There may be times when you are in a situation that is so close and contentious, where another person is needed. We are available for recounts and audits, if you think it would be helpful to have a third party help moderate.

Q. Is it still an issue to get moderators certified and recertified? We have great trainers and towns provide the rooms. This seems to be running very smoothly - this just gets done.

A. During the last legislative session, SOTS said we were a bunch incompetents and needed a great deal of help. So when over 100 of us came out they were shocked at size of our response, where so many of us turned out and corrected the incorrect parts of her testimony. The legislators watched this play out and wanted a tool to ensure proper training of moderators. This (Regional Monitors) is the tool. Registrars can be removed for lack of training, but this is not the Monitor's role, to observe our jobs, or our roles as Registrars. The monitors only clearly defined role is to organize moderator classes for their regions. Please keep receipts of all of your cancelled Registrar Certification classes, just in case you can't finish by the deadline on July 1, 2017. If the (Registrar Certification) system is not working, just keep track of it. The Regional Monitors have no specific instructions on the Registrar Certification program.

Q. The moderator trainers constantly send us emails letting us know the status of classes available, and they fill up quickly. We are not seeing any issues with a need to organize this further, they do a great job.

A. You are correct. We are seeing this for ourselves and we have seen the number of classes offered. We know from some of the other Election Monitors that because of the large distances between some of the towns, perhaps the only issue, particularly in Eastern Connecticut, is getting classes close enough to get all of their people to attend. Darlene is offering a class in New Fairfield.

Q. The Registrar Certification classes are being cancelled so frequently and finally decided we had to drive across the state to Avery Point rather than miss another class. This is where we need help, to get more local options. 1:43

A. There are plenty of local options for Moderator Certification in Hartford County, but we are not at all responsible for Registrar training.

Q. What we were hoping and expecting was that you would be able to address some of these big issues, and be our spokesperson to the SOTS.

A. We can try to expedite classes for other things, but our role is to work with the trainers of moderators and then be available to answer questions for Elections, Primaries, Audits and Recounts. But just because this isn't our charge, doesn't mean we can't, if you have an issue you would like us to bring to the SOTS, please tell us. We are here to help in any way we can.

Carol's email is: [CROG-em@crcog.org](mailto:CROG-em@crcog.org)

John's email is: [jonfitzgerald.esq@gmail.com](mailto:jonfitzgerald.esq@gmail.com)

Q. Is this a full time position? 1:45

A. No, not at all. Very not, \$8000 to \$11,000 per year stipend from the COGs.



Q. Could we suggest that all of the Regional Monitors please concentrate on the towns with the newest Registrars? There are several towns with brand new Registrars dealing with a Presidential election.

A. We would like to help if we can.

Q. One of the most critical issues this November for every town will be EDR. We need to communicate with the entire state on how important it is to register early. EDR will be overwhelmed for this Presidential if we don't get this message out.

Q. This morning we received 8 registrations from the AAA, all dated from May, so it took over two weeks to get to us. Please make sure that the SOTS is communicating with its affiliates at the DMV, at the AAA, and at Social Services offices to understand they need to send any voter registrations they receive in immediately and to issue receipts and give them to the voter. SOTS needs to remind these agencies again as we get closer to the election.

A. The receipts need to be stamped, or they don't count. Also Social Services forms do not have detachable receipts on their voter registration forms.

Q. We received a box of registration forms from Social Services after the mail in deadline, so we had to contact all of those people to go to EDR, instead of their polling place to vote.

Q. Some Social Services organizations save them up, before sending them in. In 2014 in Hartford 25 boxes of voter registration cards were found at Social Services, but were not sent in.

Q. If you can get these Registrar Certification classes available online, you will be our hero! 1:53

Q. For those who use ROAST, their monthly notification system is extremely helpful to get those friendly letters out to new voters and check on those who may have moved out.

A. Even after the canvass, if you get a response from a friendly letter, you can add those who are new and remove voters who directly confirm they are out of town. It keeps your lists clean and minimizes the need for EDR. Be aware that as this automatic DMV voter registration happens, then your annual canvass will be much, much bigger with all those folks who do not vote.

Q. We have an issue with the DMV automatic voter registration, as we have a lot of voters who, to save on taxes and insurance, register in another town. When they do that, we have to remove them from our registry, but since they didn't really move, they still come back to vote. Now when people come to our office upset that they are off, we instruct our staff to ask where is your car registered. That stops a lot of the angry response of being removed.

Q. Is there any interest in improving the ERIC report? Those spreadsheets they send are very difficult to work with, and now we are told we take action on at least 95% of those lists.

A. Yes, there is a new ROVAC committee that was put together last Thursday. Fred DeCarlo is on the committee. They will be investigating how to make those spreadsheets from the ERIC report more user friendly. We expect that the next ERIC report will come out next February, so they will have time to get something done. The ERIC report is to be used in combination with the annual canvass. There are some who are still saying they can't work with the ERIC report, you need to work on it, you need to do 95% of it. It is okay if you miss the deadline to canvass, you just will need to send friendly letters to those you missed after June 9th. You can't make them inactive if a voter doesn't answer a friendly letter, but if you get a response, you can act upon it.

Q. Is there a friendly letter template that we can use? We couldn't find one on the website.

- A. ROAST puts out a friendly letter, but we did not include one in the ROVAC handbook because we don't have one that has been accepted by the SOTS. We need this in writing, in order to put it in the handbook. So the only thing you can't do after the canvass deadline is move voter's status to inactive. There is one exception, if an acceptance or rejection letter is returned by the U.S. Postal Service as undeliverable. This stands all year round.

Motion to adjourn was made, seconded and passed unanimously at 11:30 am.