



ICAO

International Civil Aviation Organization  
Asia and Pacific Office

**Nineteenth Meeting of the Asia Pacific Regional Aviation Safety Team (APRAST/19)**

*(Bangkok, Thailand, 6-10 February 2023)*

**Agenda Item 4: Presentations – State / Industry / ICAO**

**IMPLEMENTATION SUPPORT FOR: AP-RASP TARGET-**

**T10\*:** States to progressively enhance safety oversight capability to achieve at least 75% EI in USOAP CMA [by 2024]

**ICAO APAC SAFETY IMPLEMENTATION SUPPORT ROAD MAP (SISRM) 23-25.**

*(Presented by the Secretariat)*

**SUMMARY**

AP-RASP 23-25 has identified a very important Safety Goal to achieve 75% regional average EI Level by 2024. Hence APAC RO, in line with the new ICAO Safety Implementation support policy has engaged with an initiative to work together with APAC APRAST partners in achieving the goal by identifying collection of support mission to 16 states whose EI level is below 75%, and does not have own NASP developed yet.

Attached to this WP, SISRM 23-25 is a well-developed implementation Road map utilizing resources offered by all partner states, International Organizations and donors all working towards one Goal.

All RASG APAC and APRAST Members and partners are solicited to adopt the Road Map for Implementation and consider providing resources in terms of provision of subject matter experts for CAT Missions, sharing training slots/seats, financial support, and any other support for the successful implementation of the Road Map achieving the identified time lines.

Action by the meeting is in paragraph 3 below.

**1. INTRODUCTION**

**1.1 New Safety Implementation Support Policy by APAC RO.**

1.1.1 Since 2016, Asia Pacific Regional Office (APAC RO) implementation support policy has been through implementation of Combined Action Team Missions (CATM), which has been viewed as a very successful policy since then. CATM has been accountable for increase of Average APAC EI Level effectively about 10% increase over the last few years.

1.2 However, with the introduction of ICAO new policy on Safety Implementation, APAC RO reviewed critically on APAC policy and such CAT missions in order to enhance effective implementation over and above 10% increase within three years regionally. Current EI Level in APAC region is 64.8 is below the Global average of 69.0%. When analysed critically, CATMs policy did not

have a strong mechanism to follow up with the state to assess the progress of implementation of the recommendations of USOAP Audit reports as well as CATM reports. Implementation by states required additional competencies that was not available with the states. In most of the cases studied, it was revealed that the states were struggling for implementation of those recommendations due to lack of resources, may it be human, financial or others. Establishment of the new Policy deemed going back to drawing board and to introduce paradigm shift in the policy. Implementation Support in the new policy is a collaborative effort both by ICAO and the state. ICAO will not isolate and abandon the state during the struggle for resources and continue to support through sourcing support through available resources.

1.3 Additionally AP-RASP 23-25 (draft) as aligned and amended reflecting to GASP 23-25 Targets, requires achieving of 75% EI Level by 2025.

**(Please see Target T10:** States to progressively enhance safety oversight capability to achieve at least 75% EI in USOAP CMA, and to achieve an APAC average overall USOAP EI score higher or equal to the global average [by 2024]

Considering the current gap of EI level of over 10% it is obvious that APAC region requires more aggressive, effective and collaborative safety implementation policy and procedures.

1.4 Further, Assembly A41 mandates all states to develop their own individual National Aviation Safety Plan (NASP) and implementation of the same aligned with AP-RASP 23-25 and GASP 23-25. Current progress in APAC region, number of States who have completed this task is about 12 and as a percentage is about 30% less than a third, at the time of writing this project.

1.5 Hence Safety Implementation support should incorporate an element to improve the number of states who should have developed and implemented a NASP of their own. Hence, APAC new Safety Implementation Support Policy has incorporated past experience of CATM and enhanced the expected outcomes through introduction of additional components to develop a NASP in partnership with the states based on the CATM recommendations.

## 2. DISCUSSION

### ICAO APAC New Policy Attributes and Objectives

2.1 Based on foregoing facts, figures and justifications, APAC RO has amended **Safety Implementation Support Policy** having following five essential attributes and five objectives:

2.2 **Attributes:**

2.2.1 Support Missions would have pre-agreed progressive phase wise implementation,

2.2.2 Support Mission would commence only with strong commitments from all partners; The State, ICAO RO and ICAO HQ.

2.2.3 Implementation is through collaboration and joint efforts, as planned and agreed before implementation,

2.2.4 Monitoring on agreed frequencies and bringing adjustments to address unforeseen challenges.

2.2.5 Organizing a USOAP activity by ICAO to bring expected outcomes of EI level when agreed by the State.

## 2.3 Objectives

- 2.3.1 Common objective of improving Safety Oversight Competency in the State,
- 2.3.2 Improvement of EI level by each state on an agreed value by 2025,
- 2.3.3 APAC Average EI Level increasing to 75% by 2025,
- 2.3.4 Development and implementation of a NASP by 50% of APAC States,
- 2.3.5 Development of a NASP by 75% of APAC States.

Based on the newly developed ICAO APAC RO **Safety Implementation Support Policy**, a new **Implementation procedure** has been developed as; **Systemic Assistance Programme (SAP)** and based on this new procedure and supplementing it, a detailed road map has been developed cited as **Safety Implementation Support Road Map (SISRM)** identifying for implementation for the Triennium 2023-2025.

## 2.4 Safety Implementation Support Procedure; Systemic Assistance Programme (SAP)

2.5 SAP is an initiative introduced by the ICAO APAC RO through an integrated system of a collection of support missions, based on a model introduced by ICAO NACC colleagues. Most importantly support Missions are co-developed and co-implemented by the two partners; ICAO RO and the State, collaboratively to benefit over an identified period of time. Implementation is also envisaged to be steered by the both partners as per the plan when developed and agreed on the feasibility by both parties.

2.5.1 Following new ICAO APAC Implementation support policy described earlier, implementation is based on successful outcomes of each phase or year supported with very strong commitment by the State.

## 2.6 Systemic Assistance Programme (SAP) Essential Action Items

2.7 Implementation of the SAP for the state, following important Action items have been identified as essential elements of a typical SAP and would be implemented when agreed by both parties prior to implementation:

- a) Initial agreement of steps based on a high level mission with a very strong commitment to implement as a joint venture project,
- b) Conducting a CAT Mission or at least a virtual CAT Mission (VFCATM) on identified Audit Areas by RO experts.
- c) Development of a State Specific Action Plan (SSAP) or a comprehensive National Aviation Safety (NASP), based on the recommendation of the CATM/VFCATM report in each Audit Area, collaboratively with APAC RO.
- d) Implementation of SSAP/NASP by the State and continued collaborative efforts for resource mobilization by ICAO.
- e) Bi-Annual monitoring by APAC RO and the State,
- f) Improvement to the amended Plan resolving the challenges revealed during monitoring,

- g) Agree on a date and type of USOAP activity by the State and ICAO RO/HQ,
- h) Completion of the USOAP activity and completion of the SAP programme for the State.

Please refer Attachment 2 to the WP Flow Chart of SAP for improved clarity and Attachment 3 for List of proposed projects (Wish List) required to be considered for granting support.

### **3. ACTION BY THE MEETING**

3.1 The Meeting is invited to:

- a) Discuss, improve and agree the APAC SISRM 23-25, Attachment 1 to this WP for implementation,
- b) Solicit support from all the members of APRAST through, Attachment 3- Wish List 23-25:
  - i. Financial support or provision of SMEs for APAC RO CATMs
  - ii. Financial support or sharing training courses seats by ATOs to identified states in identified Audit Areas,
  - iii. Financing or sharing OJT Instructors for Inspectors of identified states in identified Audit Areas,
  - iv. Sharing Guidance Materials and other safety sensitive procedure manuals
  - v. Support in resolving any other safety challenges when identified by APAC RO.

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**Safety Implementation Support Policy,  
Procedure and Implementation Road Map for APAC RO for the Triennium 2023-2025**

**Safety Implementation Support Policy for APAC RO.**

Since 2016, APAC RO implementation support policy has been performed through implementation of Combined Action Team Missions (CATM), which has been viewed as a very successful policy since then. CATM has been accountable for increase of Average APAC EI Level effectively about 10% increase over the last few years.

**EI Level enhancement**

However, with the introduction of ICAO new policy on Safety Implementation, APAC RO reviewed critically the existing APAC policy and potential of such missions in order to enhance effective implementation over and above 10% increase within two years regionally. Current EI Level in APAC region is 64.8 is below the Global average of 67.6%. When analyzed critically, it is revealed that CATMs policy did not have a strong mechanism to follow up with state to assess implementation of the recommendations of USOAP Audit reports as well as CATM reports. Implementation by states required additional competencies that was not available or completely alien to the states. In most of the cases studied, it was revealed that the states were struggling for implementation of those recommendations due lack of resources, human, financial or others. Establishment of the new Policy deemed going back to drawing board and to introduce paradigm shift in the policy. Implementation Support in the new policy is a collaborative effort both by ICAO and the state. ICAO will not isolate and abandon the state during the struggle for resources and continue to support through sourcing support through available channels and resources.

Additionally AP-RASP 23-25 as aligned and amended reflecting to GASP 23-25 Targets, requires achieving of 75% EI Level by 2024. Considering the current gap of EI level of 10.2% it is obvious that APAC region requires more aggressive, effective and collaborative safety implementation policy and procedures.

**Development of a NASP by every state**

Further, Assembly A41 mandates all states to develop their own individual National Aviation Safety Plan (NASP) and implementation of the same aligned with AP-RASP 23-25 and GASP 23-25. Current progress in APAC region, number of States who have completed this task is about 12 and as a percentage is about 30%, which is less than a third, at the time of writing this project.

Hence Safety Implementation support should incorporate an element to improve the number of states who should have developed and implemented a NASP of their own.

Hence, APAC new Safety Implementation Support Policy has incorporated past experience of CATM and enhanced the expected outcomes through introduction of additional components to develop a NASP in partnership with the states based on the CATM recommendations.

### **New Policy Attributes and Objectives**

Based on foregoing facts, figures and justifications, APAC RO had amended **Safety Implementation Support Policy** having following essential attributes and objectives:

#### **Attributes:**

1. Support Missions would have pre-agreed progressive phase-wise implementation,
2. Support Mission would commence only with strong commitments from all partners; The State, ICAO RO and ICAO HQ.
3. Implementation is through collaboration and joint efforts, as planned and agreed before implementation,
4. Monitoring on agreed frequencies and bringing adjustments to resolve unforeseen challenges.
5. Organizing a USOAP activity by ICAO to bring expected outcomes of EI level when agreed by the State.

#### **Objectives**

1. Common objective of improving Safety Oversight Competency in the State,
2. Improvement of EI level by each state on an agreed value by 2025,
3. APAC Average EI Level increasing to 75% by 2024,
4. Development and implementation of a NASP by 50% of APAC States,
5. Development of a NASP at least by 75% of APAC States.

Based on the above newly developed ICAO APAC RO **Safety Implementation Support Policy** a **new Implementation procedure** has been developed as:

1. **Systemic Assistance Programme (SAP)** and additionally an Implementation Road Map has been introduced as:
2. **Safety Implementation Support Road Map (SISRM)** identifying for implementation for the Triennium 2023-2025.

### **Safety Implementation Support Procedure; Systemic Assistance Programme (SAP)**

SAP is an initiative introduced by the ICAO APAC RO through an integrated system of a collection of support missions, based on a model introduced by ICAO NACC colleagues. Most importantly support Missions are co-developed and co-implemented by the two partners; ICAO RO and the State, collaboratively to benefit over an identified period of time. Implementation is also envisaged to be steered by the both partners as per the plan when developed and agreed on the feasibility by both parties.

Following new ICAO APAC Implementation support policy described earlier, implementation is based on successful outcomes of each phase or year supported with very strong commitment by the State.

**Systemic Assistance Programme (SAP) Procedure in details**

Implementation of the SAP for the state, following important steps and actions have been identified as essential elements of a typical SAP and would be implemented when agreed by both parties prior to implementation:

- 1) Initial agreement of steps based on a high level mission with a very strong commitment to implement as a joint venture project,
- 2) Conducting a CAT Mission or at least a virtual CAT Mission (VFCATM) on identified Audit Areas by RO experts.
- 3) Development of a **State Specific Action Plan (SSAP)** or a comprehensive **National Aviation Safety (NASP)**, based on the recommendation of the CATM/VFCATM report in each Audit Area, collaboratively with APAC RO.
- 4) Implementation of **SSAP/NASP** by the State and continued collaborative efforts for resource mobilization by ICAO.
- 5) Bi-Annual monitoring by APAC RO and the State,
- 6) Improvement to the amended Plan resolving the challenges revealed during monitoring,
- 7) Agree on a date and type of USOAP activity by the State and ICAO RO/HQ,
- 8) Completion of the USOAP activity and completion of the SAP programme for the State.

**Based on the above Procedure a detailed Road Map has been developed; Safety Implementation Support Road Map (SISRM) 23-25.**

Implementation would require a well-developed implementation Road Map, identifying time lines, Action Items and custodians for those Action Items, applicable for the whole region for all most twenty four (20) states whose EI Level is below 75%.

**Safety Implementation Support Road Map or Triennium 23-25 for the ICAO APAC Region (APAC-SISRM 23-25)**

With the Introduction of new policy for Technical Assistance and support for the States by ICAO, APAC Safety team essentially reviewed the support missions already deployed in the past few years. Such critical reviews revealed that development and implementation of a holistic Plan may be the way forward in achieving better results improving Safety Oversight Capabilities of States in APAC region.

Main advantage of having such a Plan is the ability to continue with the plan irrespective of budgetary allocations for each year as a continuation of the plan. Additionally, having such a plan certainly would help TCB to join few donors contributing to one Plan, rather than having different Plans developed to satisfy each donor's requirements. Moreover, States may have enhanced confidence with ICAO sustaining improvements continuously on the desired priorities.

Further, APAC-SISRM has been developed keeping in line with the AP-RASP 23-25 Goals and Targets as well as GASP 23-25 Editions.

AP-RASP 23-25 has identified Goals of improvement of APAC Average EI Level over 75% by end 2025 and number of States over the 75% EI Level as 60% from the region. Hence SISRM may be considered ICAO Implementation Road Map for AP-RASP 23-25.

In the considerations of a development of a holistic Plan, corroborating the fact; One size does not fit all, different ideas were assessed and found probably the best way to proceed is to categorize the states in different groups and determine the best way forward for each group. Such categorization may be focused based on the EI Level as the Safety Oversight Capacity is supposed to be reflected directly by the EI Score of a State. For this purpose of implementation of Safety in the APAC region, States have been identified and categorized in three different groups mainly based on the USOAP EI score maintained in OLF.

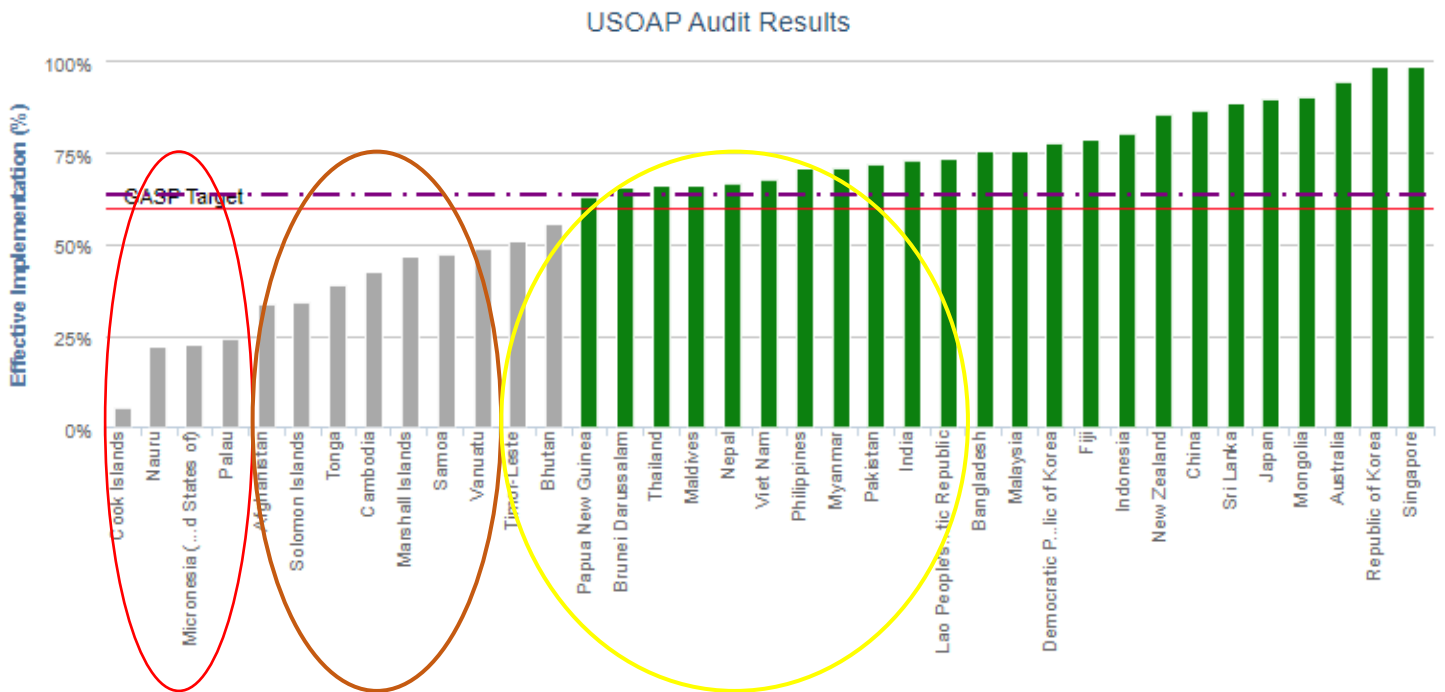
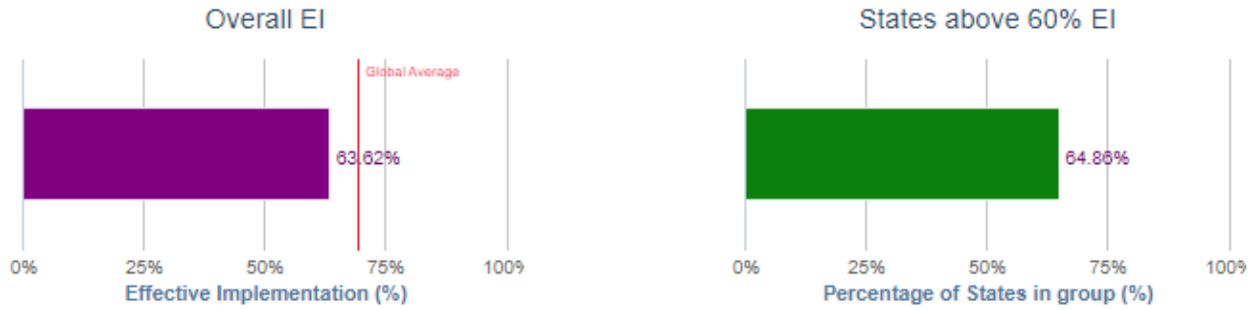
The Three Groups have been considered and identified for the Plan are as follows

1. States who have an EI Level Below 25%;
2. States who have an EI Level Below 50%;
3. States who have an EI Level Below 75%;

Categorization of States are done based on above EI Level and first segment is considered and color coded as Red identifying all the states below 25% level of EI as per January 2023. Similarly for others codes of Amber and Yellow for those states having EI level of 25%-50% and 50%-75% respectively. APAC RO has considered the current EI value of States for Color Coding applicable for the Triennium 2023-2025 for Safety Implementation Support.

Purpose of above categorization is to collaborate with internal and external partners of ICAO to seek donors and offer support to States considered.

Safety Performance based on the EI Level indicated on OLF as reflected on January 2023 is depicted below graphically.



**APAC Regional states categorization based on safety performance for the provision of implementation support by APAC RO**

**1. States EI Level below 25% SISRM Segment and Inelegance on other applicable criteria.**

**Goal - Basic Inspector competency development Plan in all Three Audit Areas; PEL, OPS and AIR**

Altogether five States have been identified under this category and the Support may be limited to Inspector competency building in basic surveillance needs and therefore the Audit Areas considered are PEL, OPS and AIR. As the States are considered mainly needing establishment of basic and primary regulatory Authority covering CE 1- CE 5 and it is usually considered taking few years in reaching maturity, mitigating Safety Issues is considered as a priority focusing on International AOC holders. For such purpose Support Missions are planned with the support of mainly TCB and the Donors providing Inspector Training through GSI Courses in all three Audit Areas. Initially a Class room Training and followed up with a OJT within few months would certainly considered essential in order to achieve expected competency levels of State Inspectors.

For the purpose of Budgetary provisions and Financial Arrangement with the Donors below is a rough cost estimate for the implementation of a typical Systemic Assistance Programme (SAP) for five States.

**Costing for the Information of Donors:**

Support CEs	Specific Support	Project Element	# of Trainees per State	Course Fee USD	Air Ticket	DSA	Total Cost per Inspector competency	Additional competencies for Red States	Total cost per state	Total for Five Red States
CE4, CE5	CE4: PEL, OPS, AIR, AIG, ANS, AGA	Inspector Course	1-3	5000	8,000	250 x 25 = 6250	19250 → 20,000	3	60,000/-	300,000/-
		OJT	1-10	▪	10,000	250 x 30 = 7500	17500 → 18,000	3	54,000/-	270,000/-
							Total per State		114,000/-	570,000/-
							Grand Total for all five States for all three Inspector Competencies			570,000/-

For the implementation support above table indicates identification of common issues based on the RO perspective on previous experiences. Selection of each State and each Element may be carried out by the APAC RO, based on the NASP already developed and agreed by each State.

For the Code Red States identified and concerned Audit Areas are PEL, OPS and AIR. Each State may have identified priorities in each Audit Area based on their preferences through the NASP. Above Table identified a Total cost of USD 570,000/- as the total cost if all three Audit Areas are considered for all five Code Red States. However, for the purpose of Implementation, TCB may collaborate with Donors, States through RO and other Stake holders determining exact scale and the size of each project, tailored to Donors and States accordingly.

**2. States EI Level below 50%:**

**Goal - Basic Inspector competency development Plan in two essential Audit Areas from PEL, OPS and AIR as determined by APAC RO in collaboration with each state.**

Cost calculation for each segment of support for holding Class room Training and OJT provision for the identified states in the desired Audit Areas as depicted in the below table.

Support CEs	Specific Support	Project Element	# of Trainees	Cost per Element USD	Air Ticket	DSA	Cost per Inspector competency	Additional competencies for Amber States	Total cost per state	Total for Five Amber States
CE4, CE5	CE4: PEL, OPS, AIR	Inspector Course	1-3	5000	8,000	250 x 25 = 6250	19250 → 20,000	2	40,000/-	200,000/
		OJT	1-10	▪	10,000	250x30= 7500	17,500 → 18,000	2	36,000/-	180,000/
							Grand Total for all five States for all three Inspector Competencies			380,000/

For the Code Amber States identified and concerned Audit Areas are PEL, OPS and AIR. Each State may have identified priorities in each Audit Area based on their preferences through the NASP. Above Table identified a Total cost of USD 380,000/- as the total cost if all two Audit Areas considered for all five Code Amber States.

However, for the purpose of Implementation, TCB may collaborate with Donors, States through RO and other Stake holders determining exact scale and the size of each project, tailored to Donors and States accordingly.

**3. States Whose EI Level has been below 75% and do not have a developed NASP for implementation;**

**Goal - Development and Implementation of a National Aviation Safety Plan based on the ICAO APAC Systemic Assistance Programme (SAP)**

States, those who do have a EI percentage value of over 50% though below 75% score and who do not have developed a NASP for implementation in 23-25; Level from 50% to 75% about 13 States do qualify for the Group no 3;. For the purpose of implementation support APAC RO considers implementation strategy identified as **Systemic Assistance Plan (SAP)** to those states who does not have a well-developed **National Aviation Safety Plan (NASP)**. Out of all thirteen states only five states have not developed a National Aviation safety Plan (NASP) as depicted in below table as the final group for SAP implementation.

**Cost estimate for Amber States based on the two Phased approach in SAP**

**Need analysis and development of State specific Action Plan /NASP through a CAT Mission;**

**Phase 1:**

Cost estimate for the CAT Mission by APAC RO based on the following:

Duration for CAT mission	Five (05) days,
Number of experts per state per Mission	Three (03),
Average cost for travel and DSA per expert	5 x250 = 1250
Travel cost	8000/-
Total cost	9250/- → USD 10,000/-

**Estimated approximate cost for first phase of CAT Mission by RO = USD 30,000/=**

**Phase 2:**

Resource and Funds Calculations for Phase 2:

1. Deployment of Three (03) Subject Matter Experts working on 3-5 Audit areas,
2. Period of implementation for each Audit area should not exceed 60-100 days of work,
3. Each State cost should not exceed 150,000/- USD total for Phase 2,

Based on above criteria approximate cost for Phase 2:

Cost per Month for ISME	10,500/-
DSA per Month	7500/-
Travel cost	10,000/-
Total cost per Month	28,000/-
Number of SME per State	3
Number of Months per State	3
Total cost	28,000 x 9 = 252,000/-
Total for Phase 2	252,000/-
Cost for Phase 1	30,000/-
Total per State	282,000/ → 300,000/-
Total for all selected Five States	1,500,000/-

**Total project Cost Approximately for Five APAC States 1,500,000/- (USD one Million, Five hundred Thousand).**

**APAC ISRM 23-25 Edition Annual Plans for all three Groups of Sates;**

Plan has identified sixteen states in three different priorities, for each year requiring approximately **USD 1,374,000/-** with the flexibility to consider spilling over funds to the next year within the triennium. In case more funds have been sourced than anticipated in the Plan then the Plan could be advanced in time for implementation as well.

Prioritization of APAC States have been done initially based on EI Level and subsequently based on the states understanding and maturity of implementation of SSP through a NASP. Considerations may be given to other yellow coded states, who have been disregarded due to the mere fact that they do have a NASP developed and being implemented by them. In such occasions if specific requests are channeled to RO or HQ by those states then specific support should be considered to offer to resolve those identified challenges through their NASP as well. Such special requests are considered outside to this ISRM 23-25 and hopefully should be reviewed for the next edition of ISRM 25-28.

In addition to above if there are going to be specific request made by states for specific elements identified by them through their NASP implementation support could be arranged on case by case basis with a similar costing methodologies.

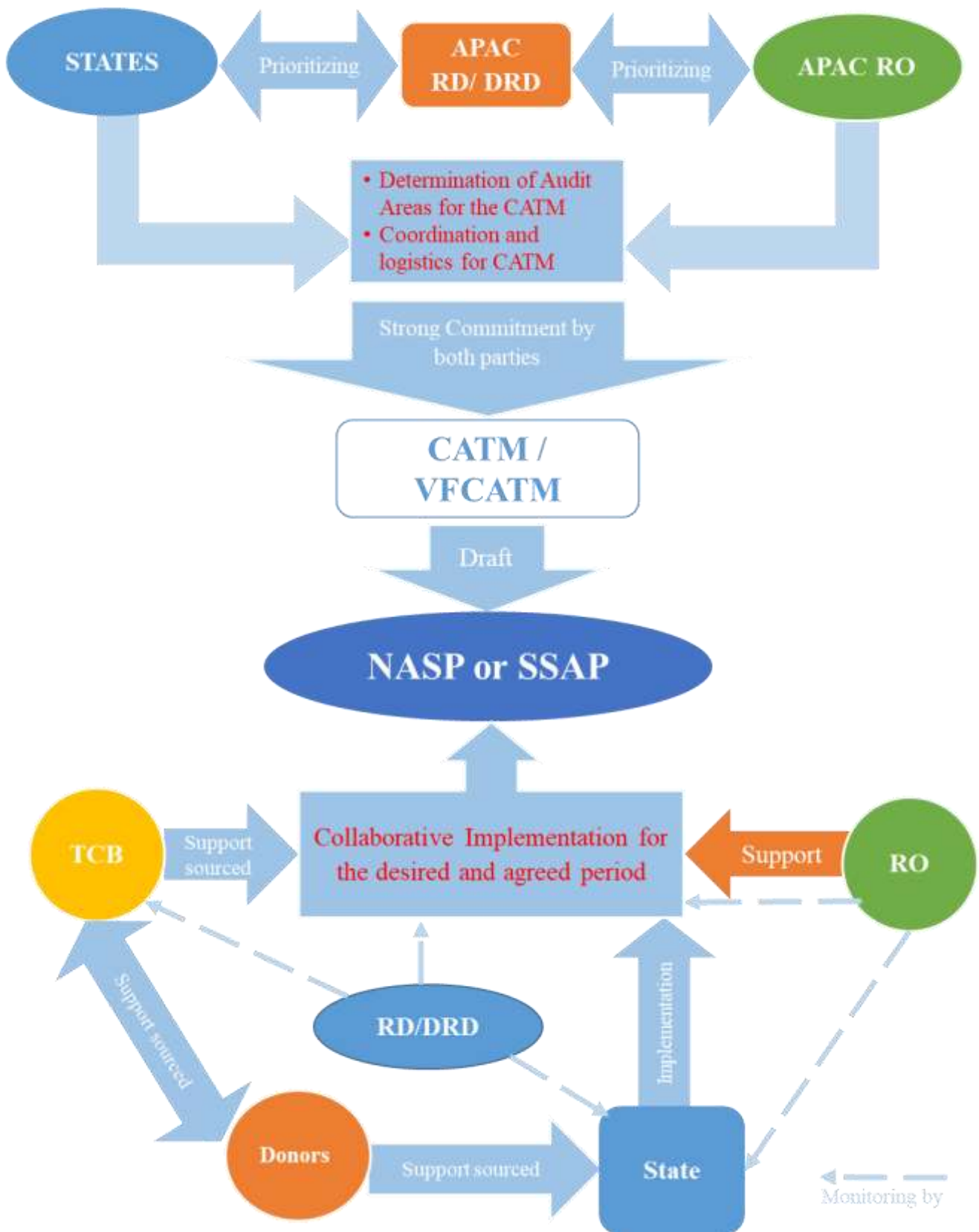
Road Map also should be amended as necessary after the implementation of first and the second year to rectify unforeseen challenges. Execution of the Plan should be the responsibility of the RO, whereas fund securing should be the responsibility of TCB.

**Group Four – Implementation of SSP and prepare for SSPIA (APAC ISRM 25-27 Edition)**

According to AP-RASP 23-25 edition, next priority or the Goal identified for APAC region is the consolidation of SSP by the States and prepare for performance of ICAO SSPIA. Thirteen States who qualify under this group are not considered for Implementation support as a priority for 23-25 version of APAC-ISRM, perhaps may be considered in the next version AP-ISRN 25-27.

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**Systemic Assistance Programme (SAP) Implementation Flow Chart**



**List of Actions proposed for implementation. (Wish List for 23-25)**

1. Inspector Classroom Training Courses; Virtual or on –site GSI or equivalent (3weeks):
  - a. PEL, OPS, AIR – Code Red and Amber States;
  - b. PEL, OPS, AIR, AIG, ANS, AGA – Code Yellow States;
    - i. PEL – Medical Examiner/Assessor Course, Check Pilot / License Examiner Course, Designate Training Course, etc.
    - ii. OPS – AOC Certification Course, DG Authorization Course, Check Pilot Course, Designate Training Course, PBN OPS Course, UPRT Course, etc.
    - iii. AIG – Aircraft Accident Investigation Course, etc.
    - iv. ANS – GSI ANS course, MATS approval course, etc.
    - v. AGA – Aerodrome certification, Aerodrome Manual certification, Aerodrome Inspection and Audit Course, etc.
  - c. SMMTC-MCIS and CAMP courses;
  - d. Auditors course for Inspectors;
  - e. SSP implementation, Industry SMS Acceptance Course, Safety practitioners course, AD3M, Safety Intelligence – for Code Yellow States.
2. Inspector OJT; for all three codes: Red, Amber and Yellow in PEL, OPS, AIR or any other Audit Area.
  - a. On-site 3-4 weeks by an OJTI (Contracted),
  - b. DG one week,
3. Other Actions/projects for Implementation Support:
  - a. Development of primary aviation legislation or secondary operating regulations or adoption of a system for a State or collection of states,
  - b. Establishing a comprehensive Licensing System,
  - c. Issuance of AOC for a new Applicant,
  - d. Establishment of an Airworthiness Code or adoption of a Code,
  - e. Establishment of an AIG unit or RAIO for a collection of States
  - f. Aerodrome certification for new or existing International Aerodrome,
  - g. Development of specific Manuals/Guidance Materials,

4. Industry Courses; SMS Implementation, Ground Handling Certification, CNS Equipment maintenance, ...
5. Development of Inspector Training Systems (ITS) including Inspector Training Programme, Annual Training Plan and Inspector Career Progression Plan.
6. Deployment of any or few iPACKs.
7. ...

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