City of Austin
Office of the City Auditor

**Special Report** 

# Effects of Traffic Patrol on Road Safety

November 2023



Studies and research show traffic enforcement can promote traffic safety. There appears to be an inverse relationship between traffic enforcement and traffic safety. In some studies, when enforcement went up, serious injuries and deaths went down. In others, when enforcement went down, serious injuries and deaths went up. Also, data can help inform where and when to deploy enforcement. To achieve good results, the type, timing, and location of enforcement are key factors. In fact, these factors may be more important than how much enforcement is used.

In Austin and three peer cities, we saw lower police capacity and increases in traffic deaths. All the police departments we reviewed reported reduced traffic enforcement efforts. In each of these cities, the number of deaths from crashes rose from 2018 to 2022. Serious injuries from crashes rose from 2020 to 2022. In Austin, the Highway Enforcement Command oversees proactive traffic enforcement. In the last few years, they experienced a significant reduction in resources. As a result, traffic enforcement is now more decentralized and reactive. In early 2023, the Department of Public Safety was deployed in Austin for a short time. During this time, Austin had more police capacity and visibility. We noted fewer crashes and deaths as compared to after the deployment ended.

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Cover: Police Officer Monitoring Speed, Access Via City of Austin Brand Portal, October 2023

# Objective

The objective of this special request was to answer two questions from City Council:

- 1. According to best practice studies and other research, what is the relationship between the level of traffic patrols and the rate of injury and death on the roadways?
- 2. In Austin and other peer cities, what impact have increased or decreased traffic patrols had on the rate of injury and death on the roadways?

# Background

City staff has noted that there has been an increase in the number of crashes in Austin over the last decade. Although there was a dip in the number of crashes during the pandemic, City staff reported these crashes tended to be more severe as speeds were higher. City staff reported that these trends appear to be consistent with national trends. Reasons for these trends may include state laws regarding speed limits as well as increases in dangerous driving behaviors, substance use, mental health issues, and the size and weight of vehicles. Notable dangerous driving behaviors include speeding, not wearing a seat belt, aggressive driving, distracted driving, and alcohol-impaired driving.

Not only are crashes on the rise in the United States, but traffic fatalities are also rising. According to the International Transport Forum's Road Safety 2022 Annual Report, road deaths in the United States increased by 16.3% from pre-pandemic levels. However, traffic safety trends in the United States appear to be different compared to other countries that are part of the Forum. In fact, the United States had the second highest mortality rate in 2021 among the Forum countries, while eight Forum countries saw their lowest number ever for road fatalities. In addition, several countries have stricter penalties and broader enforcement parameters for dangerous driving habits, such as those for driving while impaired.

Although there are numerous approaches towards promoting positive traffic safety outcomes, City staff reported that a coordinated blend of education, engineering, and enforcement, also known as the "3 E's," is best practice. The use of data to inform traffic safety efforts is also considered to be best practice. According to the National Highway Traffic Safety Administration, combining enforcement, visibility, and publicity is an effective strategy for reducing dangerous driving habits and improving

The International Transport Forum consists of 40 countries mainly in the Americas, Europe, and Asia.

traffic safety outcomes. In addition, there may be specific enforcement tactics and strategies that are particularly effective for specific dangerous driving behaviors. For example, automated enforcement systems have been proven to be effective for speed management. While enforcement can play a vital role in traffic safety, the safe systems approach, which incorporates the principles of safer people, safer vehicles, safer speeds, safer roads, and post-crash care, is another way of approaching traffic safety.

### What We Learned

# **Summary**

Studies and research show traffic enforcement can promote traffic safety. There appears to be an inverse relationship between traffic enforcement and traffic safety. In some studies, when enforcement went up, serious injuries and deaths went down. In others, when enforcement went down, serious injuries and deaths went up. Also, data can help inform where and when to deploy enforcement. To achieve good results, the type, timing, and location of enforcement are key factors. In fact, these factors may be more important than how much enforcement is used.

In Austin and three peer cities, we saw lower police capacity and increases in traffic deaths. All the police departments we reviewed reported reduced traffic enforcement efforts. In each of these cities, the number of deaths from crashes rose from 2018 to 2022. Serious injuries from crashes rose from 2020 to 2022. In Austin, the Highway Enforcement Command oversees proactive traffic enforcement. In the last few years, they experienced a significant reduction in resources. As a result, traffic enforcement is now more decentralized and reactive. In early 2023, the Department of Public Safety was deployed in Austin for a short time. During this time, Austin had more police capacity and visibility. We noted fewer crashes and deaths as compared to after the deployment ended.

# Question 1

According to best practice studies and other research, what is the relationship between the level of traffic patrols and the rate of injury and death on the roadways?

An inverse relationship can be described as a situation in which two variables change in opposite directions.

According to best practice studies and other research, there may be an inverse relationship between the level of traffic enforcement and the rate of injury and death on roadways. However, the intent and type of enforcement, when and where it is deployed, and the data used to inform the deployment are critical to traffic safety efforts. Furthermore, whether the factors listed above are occurring appears to be more important to traffic safety than how much enforcement is deployed.

#### **Review & Analysis of Studies**

We reviewed 17 studies that examined the relationship between traffic enforcement or patrol and traffic safety outcomes. This includes a National Highway Traffic Safety Administration (NHTSA) study that was a synthesis of 80 existing studies. The NHTSA study focused on the amount of enforcement and the magnitude of safety outcomes for various dangerous driving behaviors such as speeding and impaired driving, among others. See the Appendix for a table detailing the studies we reviewed. In the following paragraphs, we refer to specific studies by an assigned reference letter included in the table.

The NHTSA synthesis of studies (P) and two other studies (E and O) directly examined the relationship between the level of enforcement and traffic safety outcomes. There did not appear to be much academic research regarding the specific relationship between the level of traffic patrol and traffic safety outcomes. In the NHTSA study, the authors were only able to find a statistically significant relationship between the magnitude of enforcement efforts for seat belt use, but not for reducing

speeding, impaired driving, distracted driving, and aggressive driving. For these four behaviors, there was not comparable data or other metrics available to facilitate proper comparisons. However, the authors did not negate the possibility of a relationship between the level of enforcement and a reduction in these dangerous behaviors.

A different study (E) found an inverse relationship between the number of highway patrol officers and traffic fatalities. More specifically, the authors found that a decrease in enforcement on highways was associated with a significant increase in injuries and fatalities over a number of years. Another study (O) found that increases in budget, the number of sworn officers, and the number of hours spent in the field can reduce fatality rates in highway settings. Of these factors, the authors found the number of hours spent in the field is particularly predictive regarding fatality rate. Taken together, these studies indicate there may be an inverse relationship between the level of patrol and the rate of injury and death on the roadways. It is important to note that none of the studies established direct causation between these factors.

In addition, it appears citations play a significant role in traffic safety enforcement since they may prevent drivers from adopting dangerous driving behaviors. Police agencies may not be able to issue as many citations when resources, such as the number and availability of patrol officers, are limited. Therefore, citation volume may not equate directly to the level of patrol, but it can be correlated with enforcement levels. Seven of the eight studies that examined citations (D, F, G, I, L, N, and P) found citations can be an effective way of promoting traffic safety. One study (L) was particularly notable because it examined a situation where citation volume decreased. In this study, police officers in Quebec City, Canada, issued fewer traffic citations during labor negotiations. The authors show a reduction in the number of citations contributed to additional accidents that resulted in an injury.

In terms of traffic enforcement and the level of patrol applied, 16 of the 17 studies noted traffic safety enforcement, in and of itself, can be an effective way of reducing serious injuries and deaths on roadways. Based on these studies, it appears the presence of effective and intentional traffic safety enforcement is more important than the level of enforcement. However, available resources, such as the number and availability of patrol officers, can influence the feasibility of conducting effective and intentional traffic enforcement. The single study (K) that did not find an association with patrol was substantially broader in scope as compared to the other studies since it was nationwide in scope.

#### **NHTSA Research**

In addition to academic studies, we reviewed relevant sections of NHTSA's "A Highway Safety Countermeasure Guide For State Highway Safety Offices." This guide serves as a reference to assist highway safety practitioners in selecting science-based traffic safety approaches by describing major strategies and countermeasures, including their effectiveness. Based on our review, the guide did not explicitly address

how the level of patrol affects traffic safety outcomes. However, it was clear that various levels of resources are necessary to implement the strategies described.

#### **Insights from Austin Staff**

We also discussed the relationship between the level of traffic enforcement and traffic safety outcomes in interviews with traffic safety and law enforcement professionals at the City of Austin. According to Austin Police Department (APD) staff, the relationship between traffic patrol deployment and traffic safety outcomes can be difficult to determine. Staff noted the effectiveness of traffic patrol depends on where those patrols are deployed. For example, if the number of patrol cars simply doubled, but were not deployed in areas with high-risk traffic safety issues, the traffic safety effect would likely be minimal.

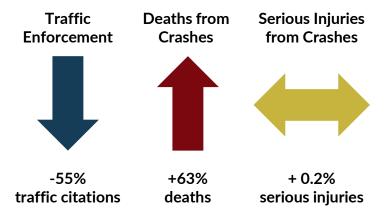
In addition, Transportation and Public Works Department (TPWD) staff noted the type of traffic enforcement can determine how effective the enforcement will be. This aligns with findings from study (A) which found a jurisdiction was able to reduce the number of crashes with injuries by 23% by prioritizing traffic stops for safety purposes over traffic stops for investigatory and economic purposes. In addition, TPWD staff noted the importance of being intentional about when and where to deploy traffic enforcement as well as using data to inform deployments. Similarly, the city in study (Q) saw a clear and consistent decline in the number of injury-related crashes after they employed the Crash Analysis Reduction Strategy (CARS). This is a data-driven approach designed to identify hot spots accounting for frequent crashes and develop specific approaches to address the hot spots.

Finally, TPWD staff said officer visibility on high-speed and high-injury roadways can be effective. They also noted the intentional positioning of officers, even when they are not actively enforcing laws, can have a positive safety impact. We noted this in study (M), which found the presence of a stationary police vehicle can reduce the rate of accidents. This underscores the importance of the location of police patrols, even when those patrols are not specifically conducting traffic enforcement.

# Question 2

In Austin and other peer cities, what impact have increased or decreased traffic patrols had on the rate of injury and death on the roadways?

Exhibit 1: Traffic enforcement capacity in Austin has decreased over the past several years, while crash-related deaths have risen and serious injuries have remained flat over this period\*



<sup>\*</sup> All figures are from 2018 to 2022 Source: OCA analysis of Austin Police Department data and Transportation and Public Works Department data, August 2023

The Austin Police Department (APD) has experienced increasing staff vacancies over the last few years, particularly for patrol officers that respond to calls for service. In response to officer shortages, APD pulled officers from other areas to backfill patrol duties. One of these areas is APD's Highway Enforcement Command (HEC). HEC officers work in units dedicated to traffic safety enforcement. Most of these officers have been reassigned to patrol which has hampered APD's capacity to conduct proactive traffic enforcement. For example, the number of traffic citations issued by APD has dropped almost 70% since the end of 2019. In addition to Austin, police departments in peer cities such as Dallas, San Antonio, and Seattle appear to be facing staffing challenges as well. Staff in these cities indicated that with reduced capacity, they are experiencing reduced traffic enforcement activities and citation volume.

In Austin, the number of fatal injuries from crashes rose steadily from 2018 to 2022, with an increasing majority of these fatal injuries occurring on high-speed roads owned by the State of Texas. For serious injuries from crashes, the numbers fell in 2020, but serious injuries from crashes returned closer to pre-pandemic levels in 2021 and 2022. We observed relatively similar trends in the rate of deaths and serious injuries on the roadways in Dallas, San Antonio, and Seattle. Also, during a six-week deployment by the Department of Public Safety (DPS) in 2023, data indicates crashes in Austin were less frequent, and outcomes were less severe than after the deployment. The limited DPS deployment bolstered policing capacity in Austin and heightened police visibility, which may have contributed to these outcomes.

#### Police Staffing & Level of Traffic Enforcement

APD has faced severe staffing challenges since June 2019, as shown in Exhibit 2. Calls for service are expected to rise as Austin's population grows, but APD continues to face significant challenges recruiting and training new staff while retaining existing staff.

**Exhibit 2: Austin Police Department vacancy rates continue to rise** 



Source: OCA analysis of Austin Police Department data from 2018 to August 2023, August 2023

As noted above, the HEC is APD's division responsible for traffic enforcement. HEC has several units including Driving While Impaired (DWI), Motors, and the Commercial Vehicle Unit (CVE) that are dedicated to traffic safety enforcement activities. Most of the officers in these units have been reassigned to patrol duties to answer calls for service. HEC's staffing reductions began in 2019, but most reductions occurred in 2021 and remain in place, as shown in Exhibit 3. Overall, HEC staffing has been reduced by 100 officers which has reduced APD's capacity to conduct dedicated and proactive traffic enforcement. Staff indicated some residents have voiced concern that a reduced police presence has contributed to more aggressive driving behaviors on the roadways.

Exhibit 3: Austin's police units dedicated to traffic safety enforcement have experienced significant staffing reductions due to patrol vacancies

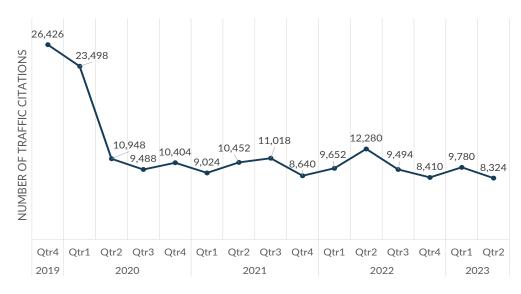
Unit	2019 Staffing	2021 Staffing	Current Staffing
DWI	27	3	3*
Motors	48	2	2
CVE	19	6	5

\*DWI Unit staff currently conduct investigative work and are not involved in direct traffic enforcement Source: OCA analysis of Austin Police Department data from 2018 to August 2023, August 2023

APD currently employs a decentralized approach to traffic enforcement. APD regularly produces sector reports which identify high-risk traffic safety locations for patrol efforts. HEC also communicates with the individual patrol commands about traffic safety issues. However, the individual patrol commands decide what areas to prioritize and how many resources to devote to traffic safety. Staffing shortages limit the amount of time patrol officers have available to conduct traffic enforcement. Also, patrol officers must be positioned strategically so they can respond to dispatched calls for service. Staff noted APD is focused on achieving adequate staffing before bringing back specialized units such as HEC due to current needs. They also indicated this could take several years.

As noted, the number of traffic citations issued by APD since the end of 2019 has dropped almost 70%. A shift in activity during the pandemic seems to be a major factor in that reduction. In 2020, the change from quarter 1 (January-March) to quarter 2 (April-June) accounted for a 53% decrease in the number of traffic citations, as shown in Exhibit 4. However, this appears to be part of a longer overall trend. Staff reported that over the last eight years, the number of traffic warnings and citations from APD has decreased by 90%. Also, HEC's share of total citation volume has declined over time. For example, HEC's share of total contacts, including warnings and citations, decreased from 40% in 2018 to just 15% in 2021.

Exhibit 4: Traffic citation volume decreased substantially in early 2020 and has persisted since



Source: OCA analysis of Municipal Court citation data from late 2019 to mid-2023, August 2023

As part of our research, we engaged with law enforcement and traffic safety practitioners in peer cities including Dallas, San Antonio, and Seattle to learn how traffic enforcement and safety dynamics in their cities compare to Austin. We learned that each of these cities' police departments are facing staffing issues. These issues appear to be affecting their police departments' capacity to conduct traffic enforcement. Like Austin, staff from these cities also reported a decline in citation volume. According to APD staff, police staffing challenges are a national trend and very few jurisdictions have enough resources for a separate, specialized traffic force.

While San Antonio and Dallas are larger cities than Austin, they appear to have more dedicated traffic enforcement resources based on the presence and size of specialized traffic enforcement divisions and units. For example, San Antonio Police Department staff reported that they have 90 officers in their Traffic and Emergency Operations division across multiple units. Staff from Dallas reported that their police department has 30 motorcycle unit officers and reported they are growing their DWI unit. Seattle staff reported they have moved away from traditional traffic enforcement as a way of promoting traffic safety since 2020, due in part to resource constraints. Instead, Seattle currently relies on automated speed cameras, which cities in Texas are not permitted to use.

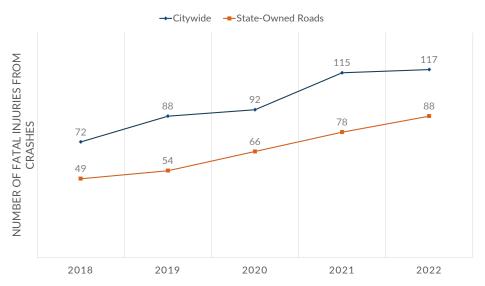
A 2007 Texas law prohibits cities from enforcing compliance with speed limits through an automated control system.

In the face of these challenges, Austin has made efforts to bolster traffic safety enforcement. The Transportation and Public Works Department (TPWD) helps fund overtime initiatives for narrowly focused traffic safety enforcement, such as the Selective Traffic Enforcement Program (STEP). However, APD staff noted this overtime opportunity has not been popular among officers, and participation has declined over time. Also, Austin is applying for less overtime grant funding due to the minimal participation. In speaking with San Antonio police staff, it appeared they have more frequent STEP program participation. Also, APD tried to fill the staffing gap through a partnership with the Travis County Constables, but this did not materialize. As noted earlier, the Department of Public Safety (DPS) assisted APD with enforcement earlier this year.

#### **Traffic Safety Outcomes**

There was a steady increase in the number of fatal injuries from crashes in Austin both on "on-system" roads and throughout the city from 2018 to 2022, as shown in Exhibit 5. Crashes tend to be more severe on state-owned roads due to higher speeds. From 2018 to 2022, the number of fatal injuries rose by 80% on state-owned roads and by 63% in Austin overall. In 2021, 68% of fatal injuries from crashes occurred on state-owned roads, but in 2022 this rose to 75%, which suggests these roads may be becoming increasingly dangerous.

Exhibit 5: Fatal injuries from crashes in Austin rose each year and most were on state-owned roads

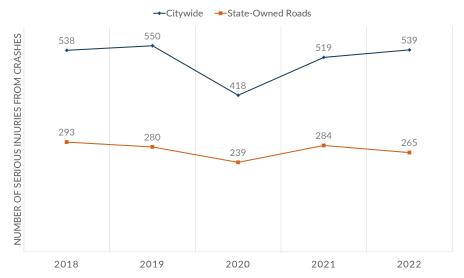


Source: OCA analysis of Transportation and Public Works Department data, August 2023

As seen in Exhibit 6, the number of serious injuries from crashes in Austin rose slightly from 2018 to 2019, but then fell in 2020 by 24%. Overall, serious injuries rose by 29% from 2020 to 2022, approaching the number of serious injuries in 2018 and 2019. On state-owned roads, there was a slighter dip in the number of serious injuries in 2020 compared to citywide. However, the number of serious injuries on state-owned roads went down from 2021 to 2022.

On-system roads are owned by the State of Texas and are typically high speed roadways such as highways and major arterial roads.

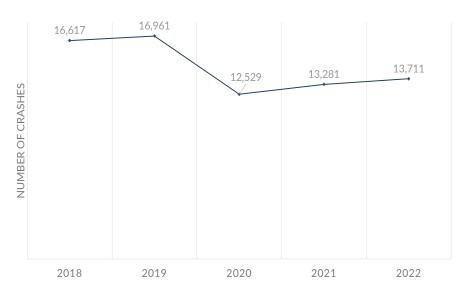
Exhibit 6: Following a dip in 2020, the number of serious injuries from crashes in Austin in 2021 and 2022 were around pre-pandemic levels



Source: OCA analysis of Transportation and Public Works Department data, August 2023

City staff reported that crashes have been on the rise over the past decade. The number of crashes rose slightly from 2018 to 2019, but then fell sharply by 26% in 2020. The number of crashes rose by about 9% from 2020 to 2022, but have not returned to pre-pandemic levels, as shown in Exhibit 7. This trend, coupled with a rise in fatalities, suggests that crashes may be becoming increasingly severe.

Exhibit 7: The number of crashes in Austin rose following a marked decrease in 2020



Source: OCA analysis of Transportation and Public Works Department data, August 2023

According to TPWD staff, a reduction in citations, contacts, warnings, and overall police presence, as well as increased speeds on the roadways, may be contributing to these outcomes. TWPD focuses on redesigning streets to reduce speed and promote traffic safety but are limited in their ability to make changes on state-owned roads due to cost and ownership issues. Therefore, traffic enforcement may be increasingly important in preventing adverse traffic safety outcomes.

In the peer cities, Dallas, San Antonio, and Seattle also saw a rise in the number of fatal injuries from crashes from 2018 to 2022. In addition, each of these cities saw a decrease in serious injuries from crashes from 2019 to 2020, followed by an increase in 2021. Staff in Dallas and San Antonio noted that high-speed roads are particularly dangerous. Also, staff in each city described facing challenges making design changes on state-owned roads.

Exhibit 8: From 2018 to 2022, fatal injuries from crashes rose in the peer cities\* we reviewed

	Austin	Dallas	Seattle
2018	72	188	14
2019	88	169	26
2020	92	212	25
2021	115	225	31
2022	117	225	30

<sup>\*</sup> We observed a similar trend in the number of fatalities from crashes in the raw data we obtained from San Antonio, but we did not include those figures in this report since they are not offical figures. Source: OCA analysis of fatalities from crashes from Austin and peer city data from 2018 to 2022, August 2023

#### Department of Public Safety (DPS) Partnership in 2023

From April to mid-May 2023, the State of Texas deployed DPS officers in Austin to assist with crime. During the deployment, there was an increase in police capacity in Austin. APD coordinated with DPS officers who helped with traffic enforcement and calls for service. For example, APD used collision data to inform DPS where proactive traffic enforcement was needed.

During their deployment, DPS officers contributed directly to traffic enforcement in Austin by conducting traffic stops. In mid-May, DPS officers were pulled out of Austin and deployed to another part of the state. APD staff compared crash and injury data during the six-week period when DPS was active in Austin with the six-week period after DPS left. The number of crashes, injuries from crashes, and fatalities from crashes each increased in the six-week period following the DPS deployment, as shown in Exhibit 9. This suggests that increased police capacity and visibility may have contributed to improved traffic safety outcomes in Austin during this time.

Exhibit 9: Crashes and injury outcomes increased in the six weeks following the DPS deployment

Outcome	DPS Austin deplyoment (4/2/2023-5/13/2023)	After Austin deployment (5/14/2023-6/24/2023)	Percent Change
Crashes	1,951	2,258	+15.7%
Injuries	953	1,156	+21.3%
Deaths	7	13	+85.7%

Source: OCA analysis of Austin Police Department data, September 2023

# Appendix

Ref	Study Name	Location (Type)	Enforcement Tactic(s)
Α	Re-prioritizing traffic stops to reduce motor vehicle crash outcomes and racial disparities	Fayetteville, North Carolina	Police stops
В	Increased police enforcement: Effects on speed	Norway (Highway)	Mobile and stationary vehicle speeding radar enforcement
С	Effect Of High-Visibility Enforcement on Motor Vehicle Crashes	Nashville, Tennessee	Data-driven analysis, High visibility enforcement
D	More Tickets, Fewer Accidents: How Cash-Strapped Towns Make for Safer Roads	Massachusetts	Citations
Е	Life and Death in the Fast Lane: Police Enforcement and Traffic Fatalities	Oregon (Highways)	Level of enforcement
F	Traffic-law enforcement and risk of death from motor-vehicle crashes: case-crossover study	Ontario, Canada	Citations
G	Do Traffic Tickets Reduce Motor Vehicle Accidents? Evidence from a Natural Experiment	Massachusetts	Citations
Н	The Effects of Conspicuous Traffic Enforcement on Speeding Behaviors: A Study of Speed Reduction Response	Asheville, North Carolina (Highway)	Mobile and stationary vehicle speeding radar enforcement
I	Speed Cameras: Improving Safety or Raising Revenue?	Edmonton, Canada	Speed Cameras, Citations
J	General and Specific Deterrent Effects of Traffic Enforcement: Do We Have to Catch Offenders to Reduce Crashes?	Queensland, Australia	Drunk/impaired driving enforcement and checkpoints
К	Traffic stops do not prevent traffic deaths	33 U.S. states	Police stops, Citations
L	The effect on collisions with injuries of a reduction in traffic citations issued by police officers	Quebec City, Canada	Citations
М	The Effect of Police Patrol on Car Accidents	Dallas, Texas	Police presence
N	Impact of Traffic Enforcement on Traffic Safety	Wyoming	Citations
0	Effectiveness of enforcement resources in the highway patrol in reducing fatality rates	Wyoming and seven neighboring states	Level of enforcement
Р	Synthesis of Studies That Relate Amount of Enforcement to Magnitude of Safety Outcomes	Various	Citations, Drunk/impaired driving enforcement and checkpoints, Level of enforcement
Q	Not by accident: An analytical approach to traffic crash harm reduction	Cincinnati, Ohio	Data-driven analysis, Drunk/ impaired driving enforcement and checkpoints

# Why We Did This Report

This report responds to a request from Council Member José "Chito" Vela, Council Member Vanessa Fuentes, and Council Member Jose Velásquez regarding traffic enforcement effectiveness.

# Scope

The scope includes the City of Austin's traffic enforcement and safety efforts, as well as those in the peer cities of Dallas and San Antonio, Texas and Seattle, Washington.

# Methodology

To complete this special request, we performed the following steps:

- reviewed and analyzed 17 studies regarding traffic enforcement
- reviewed and analyzed traffic safety and enforcement best practices and policy research from the National Highway Traffic Safety Administration
- reviewed and analyzed research about domestic and international trends in traffic safety from the International Transport Forum
- interviewed staff from the Austin Police Department (APD) and Transportation and Public Works (TPWD) Department about best practices as well as local and national dynamics, trends, and issues for traffic safety and enforcement
- interviewed traffic safety and enforcement practitioners from the cities
  of Dallas and San Antonio in Texas and Seattle, Washington, about
  traffic safety and enforcement dynamics, trends, and issues for traffic
  safety and enforcement
- collected and analyzed data on police staffing, crashes, and serious and fatal injuries from crashes in Austin, Dallas, San Antonio, and Seattle
- reviewed and analyzed reports, memoranda, and presentations regarding police staffing, traffic enforcement, and traffic safety outcomes in Austin, Dallas, San Antonio, and Seattle
- collected and analyzed data regarding traffic citation volume in Austin

# **Project Type**

Special request projects conducted by the Office of the City Auditor are considered non-audit projects under Government Auditing Standards and are conducted in accordance with the ethics and general standards.

The Office of the City Auditor was created by the Austin City Charter as an independent office reporting to City Council to help establish accountability and improve City services. Special requests are designed to answer specific questions to assist Council in decision-making. We do not draw conclusions or make recommendations in these reports.

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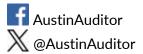
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