

Transport, Economy and Environment Overview and Scrutiny Committee

24 October 2019

Passenger Rail Update

Report of the Corporate Director Business and Environmental Services

1.0 Purpose of Report

1.1 To update members on rail developments and forthcoming changes for North Yorkshire. The report also provides Members with an overview of the rail industry to aid an understanding of the opportunity for influence.

2.0 Background

- 2.1 The rail industry in UK is governed by both domestic and European legislation. This provides the framework for how the industry operates and what responsibility various bodies have for differing aspects of rail activity and delivery.
- 2.2 At present the structure is dominated by national bodies and central control, with little influence or control able to be exercised by local government. There is however a growing impetus for change in the rail industry, largely due to the impact of recent events (eg May 18 timetable disruption) and a desire for devolution. Further devolution in rail is being explored through the Williams review (see para 3.5 below)
- 2.3 NYCC has little direct control over services and performance in the rail industry, but is working closely with the industry on a number of initiatives (see below) which it is anticipated will deliver operational enhancements for both road and rail in the near future.
- 2.4 A railway industry structure diagram and summary of functions is included for reference as appendix 1

3.0 Rail Industry National

- 3.1 Over the past 2 years, Government has announced a succession of reviews relating to the rail industry. Primarily these have been instigated as a result of failures in the industry to deliver the services that the public expect and require. Of most relevance to North Yorkshire are the Blake Jones review and the Williams review which are discussed below.
- 3.2 Summary of Industry Reviews:
 - Transport for the North Rail North Partnership Review (Blake Jones Review formally Blake Johnson)
 - Office of Road and Rail (ORR) inquiry chaired by Stephen Glaister into failures in implementing an operational timetable in May 2018

- Richard George: Railway Industry Performance Improvement in the North of England – working with and advising the TfN - Rail North Partnership to reestablish a stable operational railway across the north
- DfT Rail Review: 'root and branch' review by Keith Williams
- 3.3 Blake Jones Review: Chaired jointly by Cllr Judith Blake (Leeds elected member) and Andrew Jones MP (former Rail Minister), the terms of reference were to jointly review the Rail North Partnership arrangements for managing the devolved Northern and TPE rail franchises with a particular focus on learning from the May 2018 performance issues and steps leading up to this. Recommending solutions to avoid such events happening again, the review published its findings (https://www.gov.uk/government/publications/blake-jones-review-rail-north-partnership-review) in July 2019 with recommendations forming an action plan which has been endorsed by Transport for the North (TfN).
- 3.4 The Action Plan drafted in the review report comprises two sections, Immediate Changes (to be taken forward from April 2019) and Additional Longer-term considerations (principally around further devolution). The intention of these actions focuses on the passenger and the industry, seeking a strengthened regard for the interests of passengers together with clearer accountability and oversight of the industry.
- 3.5 **Williams Review**: to investigate and take evidence with a view to recommending the most appropriate organisational and commercial frameworks to deliver a world class railway working as part of the wider transport network and delivering new opportunities across the whole of the country
- 3.6 The Williams review is intended to be a wide ranging 'root and branch' review into the rail industry to recommend the most appropriate mechanism to support the delivery of the Governments vision for the railway. It is tasked with looking at the whole industry and reporting back in the autumn 2019 with recommendations to be published in a government white paper with a view to implementing reform of the sector beginning in 2020
- 3.7 The Review must identify passenger, workforce and community priorities and concerns, including accessibility and the needs of freight and industry and should consider how to improve transport services across UK regions and devolved nations, including exploring options for devolution of rail powers.
- 3.8 It will engage with key stakeholders including industry bodies, national and local government, Parliament and, where appropriate, the devolved governments of Scotland and Wales.
- 3.9 North Yorkshire County Council submitted a response to the call for evidence (appendix 2) particularly where relevant and specific evidence was available.
- 3.10 Keith Williams presented an update on progress of the review at a Northern Powerhouse Rail event in July 2019. In this he concluded that:-
 - The government, industry, the regions, passengers, politicians from across the spectrum and everyone else with a stake in the railway are united in a desire for root and branch change. So, the opportunity to deliver genuine, lasting reform here is huge.
 - The industry is complex and getting to our final destination may take some time, but passengers must see and feel tangible changes quickly if we are to turn around declining satisfaction and trust.

• Change will need tough decisions to be taken and require collaboration and partnership working across the sector, but the prize will be big.

4.0 Rail in North Yorkshire:

- 4.1 North Yorkshire is part of 'The North'. It is at the geographical centre of the North of England, has much of the North's strategic transport infrastructure running through it, contributes to the current economic prosperity of the North and has huge potential for future growth.
- 4.2 The statement above introduces the foreword to the councils Strategic Transport Prospectus (STP) and in clear terms articulates our view that North Yorkshire has a valid place in shaping and contributing to the economy of the North of England.
- 4.3 When considering strategic transport at north of England level NYCC has identified an objective to 'ensure that that all parts of North Yorkshire benefit from and contribute to the success of The Northern Powerhouse', and in furthering this objective, the STP identifies the following three strategic transport priorities:
 - Improving east west connectivity
 - Improving access to High Speed and conventional rail
 - Improving long distance connectivity to the north and south
- 4.4 NYCC is actively pursuing enhancements to rail services, contributing to infrastructure improvements and services enhancements where funding is available. In particular enhancement on the Harrogate Line and the Esk Valley line are two examples of engagement with the industry to achieve better outcomes for North Yorkshire residents and businesses.
- 4.5 Harrogate Line: Work to develop and deliver the c£13.5m jointly NYCC / Local Enterprise Partnership funded scheme to enable a reliable doubling of train frequency to two trains per hour in each direction between Knaresborough and York is proceeding on programme for an anticipated start of the new services in December 2020. The scheme aims to deliver relatively minor infrastructure improvements on the Harrogate line between Knaresborough and York that will allow the train operator, Northern, to fulfil its franchise commitment to double the services to two trains per hour in each direction. The County Council as the main project promoter has developed a productive partnership with both Network Rail (the infrastructure owner) and Northern (the train operator). Preliminary design of the infrastructure and final service timetable feasibility assessments are expected to be completed in December 2019. The County Council is working with Network Rail to be ready to commission the next phases of work (detailed design and delivery of the infrastructure) to start in January 2020.
- 4.5.1 Whilst initial indications are that the scheme can achieve the required two trains per hour outcome there remains one significant risk to its delivery, namely track capacity on the East Coast Mainline immediately north of York. There is a significant capacity constraint on this section of line where freight traffic, East Coast Mainline, Transpennine, Cross Country and the Harrogate Line services all interact. Network Rail is currently working with all affected train operators to undertake a comprehensive review of the time table on the whole of the East Coast Mainline (including this section north of York) which is expected to report in December 2019. This will determine whether the increased services between Knaresborough and York can be accommodated on this section of the East Coast Mainline and as such whether the NYCC / LEP scheme will achieve the required outcomes.
- 4.6 **Esk Valley Line**: In mitigation of construction impacts from the planned potash mine near Whitby, Sirius Minerals committed over £6m to provide for additional trains services to up to eight trains per day in each direction.

- 4.7 NYCC, through a Section 106 Agreement, is required to deliver this planning consideration and has established a project team and agreed governance arrangements to work to achieve these improvements.
- 4.8 Good progress has been made to date with the establishment of an effective partnership working arrangement with Northern and Network Rail. This has led to early work to identify likely infrastructure improvements and the creation of a timetable delivering 6 trains per day, the 5th train being a franchise commitment and the 6th being delivered through this initiative.
- 4.9 The new services are currently going through standard industry approval processes and are expected to be introduced in December 2019.
- 4.10 **Level Crossing**: In North Yorkshire there are a number of level crossings on busy roads that cause significant traffic congestion. These include level crossings at Starbeck in Harrogate, three level crossings in Northallerton, one in Malton, one in Selby and one in Crosshills near Skipton. Whilst the 'solution' to the traffic congestion at these crossings is likely to involve major infrastructure works and significant expenditure, this in all cases is not affordable or deliverable at this time. The County Council has therefore approached Network Rail to seek some joint working to try to identify whether there were any opportunities for more affordable (up to c£1m) rail schemes that could significantly reduce the closure time of these key level crossings. Initial indications are that there may be opportunities at Starbeck, Northallerton and Crosshills. In partnership with Network Rail we are now undertaking further investigation work on the feasibility of the rail schemes and what impact the possible reductions in closure time may have on traffic congestion at these locations. It is hoped that this work will be completed before the end of 2019 for consideration of possible funding opportunities early in 2020.

5.0 Rail service changes:

5.1 Rail services are provided either through a franchise operation or by open access operators, of relevance for North Yorkshire are the franchises for Northern and TPE, and open access services operating on the East Coast Mainline. The franchises that were let in 2016 provide a phased approach to transformational improvement. The following section summarises recent improvements, and changes to services and rolling stock that are planned for introduction in December 2019 and May 2020 timetable change periods.

5.2 Recent Rail improvements:

- Transpennine Express have invested in their stations with installation of a new customer information system, free wifi, upgrading of help points, new cycle storage facilities and improved way finding signage. All of their current trains have been modernised to the latest modern standards.
- Access for All funding secured for two of our busiest stations Northallerton and Selby.
- On the Scarborough York line Transpennine Express have recently introduced their new Nova 3 train, there will be a gradual introduction of the new trains in the coming months.
- Northern have also invested in their stations with installation of a new customer information system, new waiting shelters and Ticket Vending Machines (TVM'S), There has been a gradual introduction of more modern rolling stock including the Harrogate Line and other rolling stock is being modernised. The first "Pacer" train has been withdrawn recently with all planned to be withdrawn by May 2020. In the last year the Harrogate Leeds service has seen an

increase in frequency, Hull – Scarborough has seen the introduction of an hourly service, as has Selby – York with one or two exceptions.

5.3 Planned timetable changes:-

Harrogate Line

- o Introduction by LNER of the new direct Azuma service between Harrogate and London (six trains daily in each direction)
- For Northern there will be some changes to the current timetable to accommodate the LNER service
- Withdrawal of Pacers will see an improvement to modernised carriages on this and most routes in North Yorkshire in December.
- Skipton Line (incl. Settle & Carlisle and Bentham Line)
 - Gradual introduction of new rolling stock between Skipton / Bradford and Leeds
 - o Some minor improvements to services west of Skipton.
 - Leeds Lancaster Morecambe line is planned to be allocated improved rolling stock from December 2019.

Scarborough – York

- Transpennine Express continue with their hourly service and the gradual introduction of the new Nova 3, five coach trains onto the route, once fully operational this will increase capacity from 182 to 291 seats per train.
- Northern the planned December 2019 introduction of an hourly shuttle between York and Scarborough has been delayed and will now be introduced by May 2020.
- The changes on this line will introduce 2 trains an hour between York and Scarborough, over double the capacity and improve connections to and from York.

• Scarborough – Hull

- The recently introduced hourly service between Scarborough and Hull will become an hourly service Scarborough Seamer Filey Hunmanby to stations to Hull before going on to Doncaster and Sheffield providing regular direct connectivity from the Yorkshire Coast to South Yorkshire.
- The trains are planned to be the latest diesel trains "Class 170's" which will provide extra capacity as 3 coach trains and have been modernised to the latest passenger standards.
- O Connections at Seamer with the exception of the first train in the morning have been improved and will improve further when the hourly Northern service between Scarborough and York starts (see above).

Esk Valley

Introduction Monday – Saturday of a new early morning train enabling arrival in Whitby by 0630 and then returning to Middlesbrough arriving just before 0800 giving the line access to employment, education and earlier journeys to many points in the UK. There will be a new later evening train at around 2045 from Middlesbrough – Whitby this train will return at around 2215 from Whitby giving people the opportunity to spend evenings in the Tees Valley and on the Coast.

Northallerton and Thirsk

- Introduction of new trains and a new service to Edinburgh has meant that Transpennine Express have had to change their services on the East Coast Main Line from York northwards. The changes include:-
 - Trains to/from Middlesbrough are extended to start/ terminate at Redcar
 - Trains that currently operate between Northallerton and Liverpool will operate to Manchester Airport, passengers travelling to/from Liverpool will need to change trains.

- The number of Transpennine Express services between Northallerton Darlington, Durham and Newcastle has been reduced particularly in the early morning and late evening back from the North East to Northallerton. There is also a gap in services to /from the North East in the afternoon. The timetable issues have been raised with Transpennine Express.
- New Nova 3 trains will be gradually introduced on services to/from Teesside.
- LNER will also be gradually introducing their new Azuma trains calling at Northallerton.
- Hull Selby Leeds
 - Hull Trains will be introducing new IEP Trains (called Paragons) with extra seating capacity of 327 seats which will make their service more reliable.
 - o LNER introduced Azumas during the autumn.
 - Selby will have better connectivity with trains to/from York going through to Bridlington, Selby – Leeds trains extended to / from Halifax.
 - Most of the trains between Hull and Manchester will increase from the current three coaches to six coaches.
 - Selby York in the morning commute times there is an hour and a half gap and the times of arrival in York

6.0 Legal Implications

6.1 Consideration has been given to the potential for any legal implications arising from the recommendation. It is the view of officers that the recommendation will not have any legal implications

7.0 Financial Implications

7.1 Consideration has been given to the potential for any financial implications arising from the recommendation. It is the view of officers that the recommendation will not have any financial implications

8.0 Equalities Implications

8.1 Consideration has been given to the potential for any equalities implications arising from the recommendation. This report is an update for information report and it is the view of officers that the recommendation will not have any equalities implications, therefore an Equalities Impact Assessment is not required.

9.0 Recommendation

9.1 To note the contents of the update.

DAVID BOWE

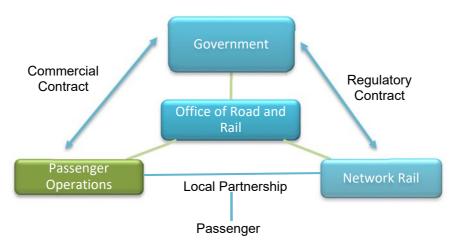
Corporate Director - Business and Environmental Services

Author of Report: John Laking

Background Documents: None

How the railways work

Following privatisation in 1993, British Rail was divided into two main parts: one part being the national rail infrastructure (track, signalling, bridges, tunnels, stations and depots) and the second being the operating companies whose trains run on that network. Subsequently the rail infrastructure was returned to the public sector. The overarching structure is shown below.



The **Secretary of State for Transport** took over strategic and financial responsibilities for the railways from the Strategic Rail Authority (SRA) under the Railways Act 2005. The Secretary of State is responsible for setting overall rail policy and strategic objectives, letting and managing the rail franchises in England (in some cases jointly with bodies such as Rail North), providing funding and procuring new rolling stock.

The **infrastructure** is owned, maintained and operated by Network Rail, with the exception of the HS1 route through Kent, which is maintained and operated by a private company as part of a concession agreement. Rail infrastructure projects are planned on a five-yearly basis as part of the industry-wide Periodic Review. Network Rail is **regulated** by the Office of Rail and Road (ORR), which is also the safety regulator.

Rail services are run by privately-owned train operating companies (TOCs) and freight operating companies (FOCs). Passenger services are let as multi-year franchises by the DfT except in London and Merseyside where they are let as concession agreements by the relevant local body. There are a limited number of 'open access' operators, who run rail services outside of the franchising process by securing timetable slots from the regulator.

The **trains** (rolling stock) are owned by private rolling stock leasing companies (ROSCOs) and leased to the TOCs.

Railway **stations** are owned by the network operator, most being leased to the TOC that is the main station user. Network Rail retains the operation of the main passenger terminals.

There are two **passenger users' groups** which speak for the passenger, undertake research on their views, and can assist with complaints. They are Transport Focus and London TravelWatch. In November 2018 a new Rail Ombudsman service was launched.

The Association of Community Rail Partnerships (ACorP) is a federation of over 60 **community rail** partnerships and rail promotion groups, which brings together railway companies, local authorities and the wider community to promote and develop local rail services. They are funded mainly by local authorities and the local train operator.

The **Rail Delivery Group** (RDG) represents the industry and develops policy on its behalf.

Dear

Williams Review - Call for Evidence 31 May 2019

Thank you for the opportunity to respond to the call for evidence for the Williams Review.

Introduction:

North Yorkshire is the largest Transport Authority by area in England and with world class environmental assets, together with strong agritech, public service and distribution sectors remains a thriving economy in the north of England. The county is served by nationally strategic railway e.g. ECML together with regional interurban and local railways, accessed by 46 stations. Growth in patronage is strong with the cumulative 10 years growth of 43% for the busiest 10 stations in the county.

The railways are important to North Yorkshire and we welcome the opportunity to contribute to this fundamental review. Please see below our detailed response to the review principles set out in the terms of reference.

Third Party Investment in the railway:

The railway industry is complex, inflexible and closed making it difficult for third party investors to engage, navigate and achieve complementary desired outcomes.

In 2012/13 NYCC commissioned consultants to prepare a Strategic Outline Business Case for investment in the Leeds – Harrogate – York (Harrogate Line) railway. This thorough analysis demonstrated that a very good case existed for the enhancement of the line, including doubling of the frequency of services and reducing end to end journey time by 15 minutes in each direction. The report was endorsed by the County Council and supported by the Local MP, Andrew Jones MP.

Key Facts:

- The core Benefit to Cost Ratio (BCR) at a forecast capital cost of £93.34m is 3.61, rising to 4.27 with the addition of Wider Impacts.
- The best case scenario achieves:
 - Service frequency doubled across the whole route,
 - End to end journey time reductions of 15 minutes (or around 19%) and,
 - o Generates a positive financial return over the life of the scheme.
- Long-term cost-reduction of operating the line with a positive Revenue:Cost ratio of 1.25
- Over 3 million annual vehicle kilometres are removed from the highway network.
- The scheme significantly enhances connectivity and economic productivity between employment, labour and international visitor markets in Leeds, Harrogate and York.

The robust work helped to provide evidence for subsequent rail franchises and the Electrification Task Force chaired by Andrew Jones MP and resulted in ECML franchise commitment to the introduction of a 2 hourly Harrogate to London direct service and in the Northern Franchise, the doubling of train service frequency to 4 trains per hour Leeds – Harrogate with a commitment to double the frequency to 2 trains per hour Harrogate to York when the infrastructure supports this.

This work was led and funded by NYCC and following its completion a case was made for developing a proposal for the enhancement of the Harrogate – York line infrastructure to enable 2 tph to be delivered by the train operator and this was put to the York, North Yorkshire and East Riding (YNYER) Transport Body (subsequently YNYER LEP) who approved in principle funding of up to £9.6m for design, development and implementation of necessary measures with an additional c£3m agreed by North Yorkshire County Council

With this approval obtained, NYCC as a third party investor formally contracted with Network to take the project through the GRIP stages and deliver the outcome of doubled frequency and journey time reduction of the Harrogate – York line. The following highlights the difficulties and obstacles that were faced in progressing the desire to invest in the railway.

- Model contracts are inflexible and strongly biased in favour of the railway industry
- Lack of commitment in funding programmes (e.g. decision to withdraw funding from Harrogate Line re-signaling) lead to Grip 2 abortive work
- Track condition requiring remedial work to bring up to acceptable standard (including replacement of pre-war switches and crossings and replacing of dated jointed track)
- Risk impacts from historic user worked crossing (UWC) at which train / vehicle incidents have occurred requiring mitigation from County Council 3rd party funds
- Inability to provide firm assurance for the delivery of the outcome following investment
- Effective monopoly and excessive cost for design and development

The County Council continues to work in partnership with Network Rail to deliver the Leeds Harrogate – York (Harrogate Line) railway improvements but the above comments are provided as an insight into the experience to date.

Poor condition of the basic network where journey times are sub-optimal and enhancement costs unacceptably high:

As mentioned above large sections of key routes in North Yorkshire are encumbered by outdated infrastructure, including Victorian era Token block signaling, 1930's points and outdated bull head and jointed track. This results in lower than optimum end to end journey speeds and frequent reliability issues or the imposition of temporary speed restrictions.

- Many of the lines in North Yorkshire (e.g. Harrogate, Esk Valley, Scarborough Hull)
 appear to be seen as a low priority for Network Rail and therefore journey speeds are
 slow and performance is poor with frequent infrastructure failures causing delays and
 cancellations (this is particularly the case on Esk Valley line)
- Basic track condition not suitable for new rolling stock or line speed improvement
- Service frequency enhancement or line speed improvement require level crossing improvement, often to a number of user worked crossings which are historic and at which previous track asset custodians have made decisions over which current infrastructure users had no input to or control of.
- Significantly varying line speeds and journey times are evident across much of the north of England rail network, e.g. on the Harrogate Line where the 18 miles from Harrogate to Leeds takes 39 mins i.e. average 27.7 mph and the c20 miles from Harrogate to York takes 39 mins, average 30.7 mph; the Esk Valley line where the 35 miles Middlesbrough to Whitby takes 1hr 31mins i.e. 23 mph. These contrast with comparable E W routes elsewhere in the country e.g. Reading to Newbury at between 45 and 60 mph
- Reliability and performance suffer greatly when infrastructure remains outdated and is not renewed. For example the Esk Valley has suffered disruption and failure incidents including signaling issues on 24 days in the last year

Poor accountability for performance, where failures in performance and reliability are not attributable to a single body and the lack of ownership of the problem causes political and consumer dissatisfaction. This has particularly been seen in the North of England during the recent (and on-going) failure of the rail industry following the May 2018 timetable introduction where cancellations, emergency timetables and services terminating early have resulted in significant customer dissatisfaction in North Yorkshire. The fact that there was no ownership of the problems, with blame being passing between the train operators, network rail, and government was not helpful and contributed to a feeling of distrust among constituents of NY. There was great anticipation ahead of the planned 'transformational' enhancement in the Northern and TPE franchises. The reality is this has not delivered and confidence in the ability of the railway to prioritise and manage investment to deliver needed enhancement is low. This is likely to be due to:

- Lack of single body responsible for a specific service operating on time and to customers' requirements leads to confusion about who is responsible.
- No direct link between investment and increased revenue where commercial operation and infrastructure decisions are separated between Train Operating Company and Track asset owner
- The customer has no effective recourse to Network Rail for service disruption and failure caused by railway infrastructure
- Remote and distant political decision making from London is not seen as suitable in the North where local political accountability is seen as desirable to drive through investment in the north.
- Closer integration of the track infrastructure and operational railway is felt to be desirable to remove conflict and provide better alignment of priorities and management of inevitable disruption from implementation.

The railway interface with other infrastructure, where rail level crossings interface with the highway this impacts on the operational efficiency, capacity and safety of highways particularly where level crossings are on main A roads in towns and economic centres. Level Crossings create problems for the highway at many locations in the county including on main A roads and in some of the largest towns in the County. The county town of Northallerton has 3 level crossing two of which are on the A167 at either end of the town; Harrogate, the largest town in the county and with the third highest GVA(B) in Yorkshire & Humber region has a level crossing on the busy A59 and Selby where the Main A19 close to the town centre is bisected by a level crossing. Elsewhere the A6068 at Kildwick has a level crossing for the main Airedale Rail Line. This accommodates 4 passenger trains per hour in each direction plus ad hoc freight movements and is closed for 35 minutes out of each hour with traffic often queued back onto the A629 dual carriageway. All of these and many other on interurban and rural roads impact the performance and economy of the areas impacted. Network Rail seem reluctant to work with Highway Authorities to address these issues.

- Local discussions do not take place either with the infrastructure provider or the train
 operators far enough in advance to deliver not just to the rail timescales but local
 authority timescales as well (e.g. funding opportunities).
- Planning for railway enhancement including major upgrades (e.g. ECML upgrades / NPR through Northallerton) do not take account of the highway and local economy impacts from railway infrastructure changes that affect level crossing operation.

Agreed franchise committed delivery and timescales are delayed and/or not delivered restricting economic growth and reducing confidence in the railway's capacity to carry out agreed enhancements.

- Agreed nationally and yet locally unable to deliver e.g.
 - Leeds Harrogate 4 trains per hour due for introduction in May 2017,
 subsequently deferred and varied to the introduction of 3 TPH from December 2019

 As reported through TfN Rail North Committee, York to Scarborough at risk due to level crossing issues on the line

Commercial and Customer care: where the complexity of elements, e.g. fares, of the railway and its failure to focus on passengers, impacts on the potential for it to support growth.

- Fares remain anomalous with issues providing complexity and higher costs for passenger in North Yorkshire, e.g. split tickets, high fares, lack of metrocard type of tickets, etc.,
- Fare products and pricing do not keep up to date with modern customer requirements, e.g. season tickets that reflect and are priced for modern mobile, home, dual location and part time working.
- Need for more engagement locally in promotion of the railways, e.g. staff to become more like ambassadors for the services and links to local attractions
- Customer care at stations particularly where station is jointly managed (e.g. York which is run by LNER and TPE) where passengers are regularly 'forgotten about' in terms of communications etc.at times of disruption.
- Franchise financial models and performance regime doesn't always favour the community or passenger needs.

Conclusion

The above reflect some of the issues and difficulties that are faced by North Yorkshire residents and commercial and community organisations. I hope this is helpful in your enquiry, and should you need further detail for any of these matters, please get in touch. We welcome this review and are happy to work with you to provide intelligence on implications and opportunities for rail in rural authority areas.

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