DARTMOOR NATIONAL PARK AUTHORITY

1 August 2014

ACCESS TO ENVIRONMENTAL INFORMATION

Report of the Head of Legal & Democratic Services

Recommendations: that Members:

- (i) note the new guidance from the Information Commissioner; and
- (ii) adopt the proposed charging policy for environmental information at Appendix 1, to take effect for EIR requests received on or after 1 September 2014.

1 Background

- 1.1 The Information Commissioner has recently issued revised guidance concerning access to Environmental Information. The new guidance makes it clear that public bodies are entitled to seek the payment of reasonable charges in respect of the staff time costs involved in dealing with a request for information.
- 1.2 This report summarises the new guidance and explores the implications for the Authority.

2 The New Guidance

- 2.1 The Environmental Information Regulations 2004 (EIR) place a legal duty on public authorities to provide environmental information held by them on request, subject to a limited range of exceptions.
- 2.2 The EIR allow public authorities to charge for making environmental information available, but any charge must be reasonable. Until recently it was advised that staff time costs for locating and collating the information were not recoverable, just disbursement costs (photocopying, postage etc).
- 2.3 In a guidance note published on 25 June 2014 the Information Commissioner announced a change in advice on the lawfulness of charging for staff time, as a result of arguments raised during the course of a recent appeal.

3 The Legislation

- 3.1 The EIR implement the provisions of EU Directive 2003/4/EC of the European Parliament of the Council (the Directive) into UK law.
- 3.2 The intention behind the EIR is to increase public access to environmental information. Article 5(2) of the Directive provides:

Public authorities may make a charge for supplying any environmental information but such charge shall not exceed a reasonable amount.

- 3.3 Article 5(2) is implemented into UK law by virtue of Regulation 8 of the EIR. Regulation 8(1) permits a public authority to charge for making environmental information available. However, Regulation 8(3) states any charge cannot "exceed an amount which the public authority is satisfied is a reasonable amount". Regulation 8(3) does not provide any definition of the word "reasonable".
- 3.4 Regulation 8(2) prevents a public authority from making any charge to access public registers or lists of environmental information it holds, or to examine the information that has been requested at a place made available by the public authority.
- 3.5 Regulation 8(8) requires all public authorities to publish and make available to applicants a schedule of charges and information on the circumstances in which a charge may be made or waived. This reflects the provisions of the Aarhus Convention and Article 5(3) of the Directive.

4 The Information Commissioner's Advice

- 4.1 The Information Commissioner's new guidance states that there are two broad types of costs for which a public authority can charge:
 - □ The cost of staff time spent locating, retrieving and extracting the information.
 - □ The costs incurred when printing or copying the requested information and sending it to the applicant.
- 4.2 The guidance states that it would be unreasonable for a public authority to include any further costs associated with a request, for example:
 - □ The costs associated with maintaining a register of environmental information.
 - □ The cost of maintaining a database used by the public authority to answer requests for environmental information.
 - □ Staff time spent redacting excepted information after it has been retrieved.
- 4.3 The guidance advices that public authorities must have a published schedule of charges in order to be able to charge applicants for environmental information. It also emphasises that public authorities must not charge applicants for inspecting information in person or accessing public registers or lists of environmental information.
- 4.4 The EIR do not specify the rate at which staff time should be calculated. The Information Commissioner's view is that the FOI Fees Regulations rate of £25 per hour is a reasonable starting point. The guidance also states that in general terms, a reasonable amount will not exceed the cost of making the information available.

5 Advance Payment

- 5.1 Regulation 8(4) allows a public authority to require advance payment of a charge for making environmental information available.
- 5.2 Where a public authority decides it requires an advance payment, it must notify the applicant of this within 20 working days of receipt of the information request, together with the amount of payment required.
- 5.3 The applicant then has 60 working days following issue of the notification to make the payment. If payment is not made within this period the authority is not obliged to proceed with the request.

6 Future Practice

- 6.1 It is very important that the Authority continues to promote public access to and understanding of the environmental information it holds by making as much as possible available free of charge on the website and in reports and publications.
- 6.2 The Authority will continue to meet its legal duty to provide access to all public registers or lists of environmental information it holds, and will always use its best endeavours to accommodate members of the public who wish to examine information at Parke.
- 6.3 Requests for information under the EIR will be dealt with in accordance with the Regulations and within the prescribed time limits. A charge will usually be made for staff time (@ £25 per hour) and disbursement costs. In cases where the cost is believed likely to exceed £75 (3 hours of staff time) advance payment will be requested.
- 6.4 The information being supplied will in most cases be information that can only be provided by us, therefore the charge will be outside the scope of VAT. If however, the information being requested and supplied, could be obtained elsewhere, the charge will be subject to VAT at the current rate in operation. Therefore the total charge will be notified to the third party on a case by case basis.
- 6.5 The Head of Legal & Democratic Services, who is the responsible officer for EIR compliance and cost assessment, shall have delegated authority to waive the usual charge where it is considered inappropriate or uneconomic to require payment.

7 Financial implications

- 7.1 It is not anticipated that the new procedures will have a significant impact upon staff time or other costs. The object of the proposed changes is not to reduce the number of requests received or the amount of information released. That said, the number of requests is not expected to rise and any speculative requests may be discouraged.
- 7.2 The proposed charges are set out above in paragraphs 6.3 and 6.4 and in Appendix 1. It is very difficult to predict likely income, as to date there has not been any time recording of officer time on EIR requests. In the past couple of years the number of requests received has averaged around 2 4 each month.

8 Equality & Sustainability Impact

8.1 It is not believed that these internal procedures will have a negative impact upon equality issues. It is proposed that the Head of Legal & Democratic Services should have delegated authority to waive fees / charges in any appropriate circumstances.

9 Conclusion

9.1 The new advice is a welcome recognition of the staff costs of complying with requests for information under the EIR. Although the number of requests is relatively low, some requests require a considerable amount of staff resource to retrieve, copy and forward the information sought. The ability to make a reasonable charge for staff time is a positive step in supporting service delivery.

CHRISTOPHER WALLEDGE

Attachments: Appendix 1: Fees & Charges 2014/15

20140718 CRW fees and charges 2014/2015

Dartmoor National Park Authority Fees & Charges 2014/15

Environmental Information Regulations 2004

Description of Charge	Unit		2014/15 Rates (VAT @ 20%)	
Disbursement Costs		Net (£)	Vat (£)	Gross (£)
Photocopying - Black and White (charges for sizes over A3 as for plans below)	A4 per side	0.17	0.03	0.20
	A3 per side	0.17	0.03	0.20
Photocopying - Colour A4 (charges for sizes over A3 as for plans below)	A4 per side	0.29	0.06	0.35
	A3 per side	0.29	0.06	0.35
Microfilm			as photocopying	
Plans	A4 per side	0.29	0.06	0.35
	A3 per side	0.29	0.06	0.35
	A2 per side	0.58	0.12	0.70
	A1 per side	1.04	0.21	1.25
	A0 per side	2.00	0.40	2.40
Staff Time				
For every member of staff or agency staff involved in considering or dealing with a request for information.	Search for information Identification & location of information Retrieval of information Copying information Collating and despatching information	VAT will only b	£25 per hour (pro rata) VAT will only be charged if the information could be obtained elsewhere	

DARTMOOR NATIONAL PARK AUTHORITY

1 August 2014

LOCAL GOVERNMENT PENSION SCHEME AND COMPENSATION PAYMENTS: POLICY RELATING TO DISCRETIONARY ITEMS WITHIN THE REGULATIONS

Report of the Head of Human Resources

Recommendations: That Members:

- (i) approve the pension policy discretions with respect to the new Local Government Pension Scheme (LGPS) which commenced on 1 April 2014;
- (ii) approve the updated policy statement relating to extant discretionary powers under the LGPS Regulations and the Local Government (Discretionary Compensation) Regulations

1 Introduction

- 1.1 Dartmoor National Park Authority and its officers participate in the Local Government Pension Scheme (LGPS) as administered by Peninsula Pensions.
- 1.2 All employers who participate in the LGPS are required to formulate a discretions policy in accordance with Regulation 66 of The LGPS (Administration) Regulations 2008, and Regulation 60 of the LGPS Regulations 2013. The policy must be published and kept under review.
- 1.3 The Authority is also under a duty to formulate, publish and keep under review the policy that the Authority applies in exercising discretionary powers under Regulations relating to the payment of compensation to employees whose employment is terminated as a result of redundancy or certain other reasons.
- 1.4 The proposed policy document, attached to this paper at Appendix 1, is intended to comply with these duties and sets out the discretionary powers concerned, identifies the relevant Regulation that gives the Authority the discretion and proposes how the discretion will be exercised.

2 Discretions Policy

- 2.1 There are many discretions in the current regulations together with several more extant from the previous regulations. However, there is only a handful where there is a requirement for the employer to have a written policy statement. The other discretions which do not need a written policy will be dealt with as and when they are required.
- 2.2 Members approved two separate discretions policies relating to the LGPS and the Discretionary Compensation Regulations in January 2010 (NPA/10/002). The proposed policy statement, which includes discretions extant from the previous regulations, replaces both of these policies. All discretionary policies from the previous regulations have been carried over unchanged to the new policy.

- 2.3 The policy has been developed considering approaches from other National Park Authorities and advice provided by Devon County Council and Peninsula Pensions. The format and content of the policy document has been considered by Peninsula Pensions as acceptable for the purpose of fulfilling our responsibilities under the regulations.
- 2.4 The draft policy was discussed and agreed at Leadership Team on 17 June 2014. We have also consulted with UNISON and the Authority's Section 151 Officer.
- 2.5 The discretions proposed are considered appropriate to provide flexibility when managing organisational change, in particular regarding retirement and redundancy, at a time of ongoing financial constraint in the public sector.

3 Timescale

3.1 Each employer should have published their new discretions policy by 1 July 2014 but due to officer capacity this work has been delayed slightly.

4 Conclusion

- 4.1 The Authority is under a responsibility to ensure that, when exercising these discretions, it acts with prudence and propriety. Whilst immediate and future costs, both to the employer and to the pension scheme, will be the most obvious factors to be taken into account, it is also important to ensure discretion is exercised with transparent fairness and without discrimination.
- 4.2 The recommendations, if approved, will form the Authority's policy on the exercise of discretions and ensure that the Authority meets the statutory requirements following the changes to the LGPS Regulations 2013.

5 Financial Implications

- 5.1 Members will see from the detail in Appendix 1 that the Authority is continuing to adopt a flexible but robust approach, bearing in mind the general overall cost of the scheme, and with the intention of not adding to this further.
- 5.2 There are no immediate costs at this stage and any decisions relating to this policy, taken under delegated powers, will be reported to a subsequent meeting of the Audit and Governance Committee.
- 5.3 Where a decision taken under this policy would result in a cost to the Authority exceeding £25,000, approval from full Authority would be required in accordance with Financial Regulations.

6 Equality & Sustainability Impact

6.1 The policy presented for approval is legally compliant and is designed to ensure equality of opportunity for all employees and ex-employees.

NEIL WHITE

Background Papers NPA/10/002

Attachments: Appendix 1 – LGPS & Compensation Payments: Policy relating to discretionary items within the Regulations

20140801 NW LGPS Policy

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DARTMOOR NATIONAL PARK AUTHORITY

Local Government Pension Scheme and Compensation Payments:

Policy relating to discretionary items within the Regulations

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Local Government Pension Scheme Regulations Discretionary powers and scheme employer responsibilities from 1.4.2014 in relation to post 31.3.2014 active members and post 31.3.2014 leavers	DNPA Policy
Regulation R9 (1) & R9 (3): Determine rate of employees contributions	See Employee Contribution Bands Policy
Determine rate of employees contributions	
Regulation R16 (2) (e) & R16(4) (d): Contribution to shared APC costs Whether and how much, and in what circumstances to contribute to a shared cost Additional Pension Contribution (APC) scheme.	DNPA will not contribute towards a shared cost APC scheme (except where required to under the Regulations)
Regulation R17(1): Contribution to shared AVC costs Whether, how much, and in what circumstances to contribute to shared cost AVC arrangements entered into on or after 1.4.2014	DNPA will not contribute towards a shared cost AVC arrangement (except where required to under the Regulations)

Regulation TP15(1)(d) & A25(3) Whether, how much, and in what circumstances to continue to contribute to a shared cost AVC arrangement entered into before 1.4.2014	DNPA will not contribute towards a shared cost AVC arrangement (except where required to under the Regulations)
Regulation R22 (8) (b) Whether to extend the 12 month option period for a member to elect that deferred benefits should not be aggregated with a new employment	DNPA will not permit aggregation beyond 12 months
Regulation R22 (7) (b) Whether to extend the 12 month option period for a member to elect that deferred benefits should not be aggregated with an ongoing concurrent employment	DNPA will not permit aggregation beyond 12 months
Regulation R30 (6) & TP11 (2) Whether all or some benefits can be paid if an employee reduces their hours or grade (flexible retirement)	To consider each case on its merits having regard to financial and service delivery considerations. The Authority will consider flexible retirement requests in accordance with its Flexible Retirement Policy
Regulation R30 (8) Whether to waive, in whole or in part, actuarial reduction on benefits paid on flexible retirement	DNPA will only consider whether to waive, in whole or in part, an actuarial reduction in exceptional cases where there is a business benefit.
Regulation R30 (8) Whether to waive, in whole or in part, actuarial reduction on benefits which a member voluntarily draws before normal pension age	DNPA will only consider whether to waive, in whole or in part, an actuarial reduction in exceptional cases where there is a business benefit.
Regulation TPSch 2, para 2 (2) Whether to "switch on" the 85 year rule for a member voluntarily drawing benefits on or after age 55 and before age 60	DNPA will only consider whether to "switch on" the 85 year rule in exceptional cases where there is a business benefit.

Regulation TPSch 2, para 2 (3) Whether to waive, on compassionate grounds, the actuarial reduction applied to benefits from pre 1.4.2014 membership where the employer has "switched-on" the 85 year rule for a member voluntarily drawing benefits on or after age 55 and before age 60	DNPA will only consider whether to waive the actuarial reduction in exceptional cases on compassionate grounds.
Regulation R31 Whether to grant additional pension to an active member or within 6 months of ceasing to be an active member by reason of redundancy or business efficiency (by up to £6,500* p.a.) (* the figure of £6,500 will be increased each April under Pensions Increase orders)	DNPA will only consider whether to grant additional pension in exceptional cases where there is a business benefit.
Regulation R100 (68) Extend normal time limit for acceptance of a transfer value beyond 12 months from joining the LGPS	DNPA will not extend the normal time limit beyond 12 months

Local Government Pension Scheme Regulations Discretionary powers in relation to scheme members (excluding councillor members) who ceased active membership on or after 1.4.2008 and before 1.4.2014.	DNPA Policy
Regulation B12 Whether, for a member leaving on the grounds of redundancy or business efficiency on or before 31 March 2014, to augment membership (by up to 10 years). The resolution to do so would have to be made within 6 months of the date of leaving. Hence this discretion is spent entirely after 30 September 2014.	DNPA will not award additional membership to active members other than in exceptional circumstances. Applications will be treated on their merits and might include, but are not limited to, early retirement on compassionate grounds or redundancy where the costs are offset in part or in full by efficiency gains or savings.
Regulation B30 (2) Whether to grant application for early payment of deferred benefits on or after age 55 and before age 60	DNPA will only consider applications in exceptional cases on compassionate grounds.
Regulation B30 (5) Whether to waive, on compassionate grounds, the actuarial reduction applied to deferred benefits paid early under B30	DNPA will only consider whether to waive the actuarial reduction in exceptional cases on compassionate grounds.
Regulation B30A (3) Whether to grant an application for early payment of a suspended tier 3 ill health pension on or after age 55 and before age 60	DNPA will only consider applications in exceptional cases on compassionate grounds.
Regulation B30A (5) Whether to waive, on compassionate grounds, the actuarial reduction applied to benefits paid early under B30A	DNPA will only consider whether to waive the actuarial reduction in exceptional cases on compassionate grounds.

 Local Government Pension Scheme Regulations Discretionary powers under the Local Government Pension Scheme Regulations 1997 in relation to: a) active Councillor members b) Councillor members who ceased active membership on or after 01.04.1998, and c) any other scheme members who ceased active membership on or after 01.04.1998 and before 01.04.2008 	DNPA Policy
Regulation L31 (2) Grant application from a post 31.3.1998 / pre 1.4.2008 leaver or from a councillor for early payment of benefits on or after age 50/55 and before age 60. Note: benefits paid on or after age 50 and before age 55 are subject to an unauthorised payments charge and, where applicable, an unauthorised payments surcharge under the Finance Act 2006. Also, any part of the benefits which had accrued after 5 April 2006 would generate a scheme sanction charge.	DNPA will only consider applications in exceptional circumstances on compassionate grounds.
Regulation L31 (5) Waive, on compassionate grounds, the actuarial reduction applied to benefits paid early for a post 31.3.1998 / pre 1.4.2008 leaver or a councillor leaver	DNPA will only consider whether to waive the actuarial reduction in exceptional cases on compassionate grounds.
Regulation L31 (7A) Councillor optants out and pre 1.4.2008 employee optants out only to get benefits paid from NRD if employer agrees	DNPA will only consider applications in exceptional cases on compassionate grounds.

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Local Government Pension Scheme Regulations Discretionary powers under the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 (as amended) – prefix C(06)	DNPA Policy
Regulation C06 (5) To base redundancy payments on an actual weeks pay where this exceeds the statutory week's pay limit.	DNPA bases redundancy payments on an actual weeks pay where this exceeds the statutory week's pay limit.
Regulation C06 (6) To award lump sum compensation of up to 104 week's pay in cases of redundancy, termination of employment on efficiency grounds, or cessation of a joint appointment	Other than in exceptional circumstances, DNPA does not award augmentation of service under regulation 12 of the Principal Regulations, and so could determine to make compensatory awards under this regulation. For employees affected by TUPE regulations, DNPA will take legal advice where appropriate.

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Local Government Pension Scheme Regulations Discretionary powers under the Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2000 (as amended) – prefix C(00)	DNPA Policy
Regulation C(00)21 (4) How to apportion any surviving spouse's or civil partner's annual compensatory added years payment where the deceased person is survived by more than one spouse or civil partner	To consider each case on its merits having regard to financial considerations.
Regulation C(00)25 (2) How it will decide to whom any children's annual compensatory added years payments are to be paid where children's pensions are not payable under the LGPS (because the employee had not joined the LGPS) and, in such a case, how the annual added years will be apportioned amongst the eligible children	To consider each case on its merits having regard to financial considerations.
Regulation C(00)21 (7) Whether, in respect of the spouse of a person who ceased employment before 1 April 1998 and where the spouse or civil partner remarries, enters into a new civil partnership or cohabits after 1 April 1998, the normal pension suspension rules should be disapplied i.e. whether the spouse's or civil partner's annual compensatory added years payments should continue to be paid	To consider each case on its merits having regard to financial considerations.
Regulation C(00)21 (5) If, under the preceding decision, the authority's policy is to apply the normal suspension rules, whether the spouse's or civil partner's annual compensatory added years payment should be reinstated after the end of the remarriage, new civil partnership or cohabitation	If DNPA determined to suspend such payment, it will reinstate after the end of the remarriage, new civil partnership or cohabitation.

Regulation C(00)21 (7) Whether, in respect of the spouse or civil partner of a person who ceased employment before 1 April 1998 and where the spouse or civil partner remarries or cohabits or enters into a civil partnership on or after 1 April 1998 with another person who is also entitled to a spouse's or civil partners annual CAY payment, the normal rule requiring one of them to forego payment whilst the period of marriage, civil partnership or co-habitation lasts, should be disapplied i.e. whether the spouses' or civil partners' annual CAY payments should continue to be paid to both of them	To consider each case on its merits having regard to financial considerations.
Regulation C(00) 17 Whether and to what extent to reduce or suspend the member's annual compensatory added years payment during any period of re-employment in local government	DNPA will make a determination after consultation with the Administering Authority and having regard to the date of original award
Regulation C(00) 19 How to reduce the member's annual compensatory added years payment following the cessation of a period of re- employment in local government	DNPA will make a determination after consultation with the Administering Authority and having regard to the date of original award

DARTMOOR NATIONAL PARK AUTHORITY

1 August 2014

TREE PRESERVATION ORDERS AND SECTION 211 NOTIFICATIONS (WORKS TO TREES IN CONSERVATION AREAS) DETERMINED UNDER DELEGATED POWERS

Report of the Trees and Landscape Officer

Recommendation : That the decisions be noted.

TREE PRESERVATION ORDERS

West Devon

Ref: 14/0007 4 Willowby Gardens, Yelverton SX 5242 6765

Application to reduce the height of two poorly formed ash stems by 50%. Consent was granted subject to the following conditions:

- 1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
- 2. All works are carried out in accordance with British Standard 3998:2010 Tree Work Recommendations.

Ref: 14/0014 Meldon Village Hall

SX 5601 9238

Application to fell two beech trees. Consent was refused for the following reasons:

- The trees appear to be in good health with no evidence of serious structural weakness that compromise the structural integrity of the trees at the present time. No fungal fruiting bodies were found and no basal decay with associated fungal infection was found on either tree.
- 2. The reasons put forward that the 'trees are old and dangerous' has not been proven and no supporting evidence has been submitted to indicate the trees are in a dangerous condition.
- 3. The trees are an important feature in the landscape, they are very visible from numerous publically accessible viewing points in and around Meldon Village and the removal of the trees will have a detrimental impact on the character and visual amenity of Meldon Village.
- 4. The removal of the trees will compromise the integrity of the linear tree group.

Ref: 14/0016 Summerhayes, Throwleigh

SX 6669 9060

Application to coppice an oak and an ash tree. Both trees are in poor condition. Consent was granted subject to the following conditions:

- 1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
- 2. All works are carried out in accordance with British Standard 3998:2010 Tree Work Recommendations.

South Hams

Ref: 14/0011 The Chapel, Didworthy

SX 6848 6209

SX 6508 9325

Application to fell a beech tree and crown reduce two other beech trees by 5m. The tree to be felled is infected with *Ganoderma* and is liable to collapse in high winds. The crown reduction will help balance the crowns of the retained trees. Consent was granted subject to the following conditions:

- 1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
- 2. All works are carried out in accordance with British Standard 3998:2010 Tree Work -Recommendations.
- 3. Replacement planting of one standard beech tree within the crown spread of the original during the first planting season following felling.

SECTION 211 NOTICES

West Devon

Ref: 14/0005 Christ Church, Brentor SX 4826 8135

Notification to remove two low branches from a mature beech. The works will have minimal impact on the health or appearance of the tree.

A Tree Preservation Order has not been made.

Ref: 14/0006 Laurel Cottage, Brentor SX 4826 8151

Notification to fell a semi-mature Monterey cypress. The tree is an inappropriate species for the site and if retained would damage the boundary bank.

A Tree Preservation Order has not been made.

Ref: 14/0008 Leatside, South Zeal

Notification to fell a group of cypress, a spruce and a scots pine. The felling will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

Ref: 14/0009 Torside, Mary Tavy SX 5090 7863

Notification to fell two cypress trees and coppice a group of eight sycamore stems. The works will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

Ref: 14/0010 Broadmead Cottage, Brentor

Notification to fell a holly, a laurel and to pollard two ash trees. The works will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

Ref: 14/0012 The Old Vicarage, Dunsford SX 8142 8917

Notification to fell four oak trees, one hawthorn, one ash group of elm and a cherry. The works will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

Ref: 14/00013 Moor Park, Chagford SX 7018 8784

Notification to fell a Western red cedar and reduce the canopies of two beech trees. The works will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

Ref: 14/00154 Chapel Lane, HorrabridgeSX 5128 6995

Notification to coppice two sycamore trees. The felling will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

Teignbridge

Ref: 14/0017North Bovey Village GreenSX 7400 8390

Notification to carry out minor works to six oak trees. The works will have minimal impact on the health or appearance of the trees.

A Tree Preservation Order has not been made.

BRIAN BEASLEY

SX 4804 8134

20140801 BB TPOs and 211s