

**STATE OF CALIFORNIA – DEPARTMENT OF CONSUMER AFFAIRS
CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS**

NOTICE IS HEREBY GIVEN that the California Architects Board (Board) is proposing to take the action described in the Informative Digest. Any person interested may present statements or arguments orally or in writing relevant to the action proposed at a hearing to be held at the office of the **California Architects Board, Landscape Architects Technical Committee, 2420 Del Paso Road, Suite 105, Sacramento, California 95834, on March 24, 2014, at 11:30 a.m.** Written comments, including those sent by mail, facsimile, or e-mail to the addresses listed under Contact Person in this Notice, must be received by the Board at its office no later than 5:00 p.m. on **March 24, 2014** or must be received by the Board at the hearing.

The Board, upon its own motion or at the instance of any interested party, may thereafter adopt the proposal substantially as described below or may modify such proposals if such modifications are sufficiently related to the original text. With the exception of technical or grammatical changes, the full text of any modified proposal will be available for 15 days prior to its adoption from the person designated in this Notice as the contact person and will be mailed to those persons who submit written or oral testimony related to this proposal or who have requested notification of any changes to the proposal.

Authority and Reference: As a result of legislative reorganization, the Landscape Architects Technical Committee (LATC), established on January 1, 1998, replaced the former Board of Landscape Architects and was placed under the purview of the Board. Pursuant to the authority vested by section 5630 of the Business and Professions Code (BPC) and to implement, interpret, or make specific section 5681 of the BPC, the Board is considering changes to Division 26 of Title 16 of the California Code of Regulations (CCR) as follows:

INFORMATIVE DIGEST

A. Informative Digest/Policy Statement Overview

Existing law, BPC section 5681, authorizes the LATC to charge a biennial license renewal fee. CCR section 2649 (Fees) specifies the biennial license renewal fee to be \$400. This regulatory proposal would amend CCR section 2649 to temporarily reduce this fee to \$220.

BPC section 128.5 requires agencies within the Department of Consumer Affairs (DCA) to reduce license or other fees if the fund balance meets or exceeds 24 months in reserve at the end of any fiscal year (FY). As of January 2013, the LATC had 19.5 months of funds in reserve, which was approaching a level that would require LATC to take action in accordance with BPC section 128.5. To address the fund condition, the LATC approved revenue savings measures consisting of a negative budget change proposal to reduce LATC's spending authority by \$200,000, and a temporary license renewal fee reduction from \$400 to \$220 for one license renewal cycle. In order to temporarily reduce license renewal fees, a regulatory change proposal to amend 16 CCR Section 2649

is necessary. This regulatory proposal would amend 16 CCR Section 2649, subsection (f), to reduce the fee for the biennial renewal of a license from \$400 to \$220, from July 1, 2015 through June 30, 2017, and would return to \$400 on July 1, 2017.

Additionally, this proposal would amend 16 CCR Section 2649 subsections (b), (e), and (f) to remove outdated references to fees that were in effect before July 1, 2009, since it is unnecessary and no longer relevant to specify these fees.

B. Anticipated Benefits of Proposal

As of January 2013, the LATC had 19.5 months of funds in reserve which the Board believes is approaching the maximum 24 months allowable by law. The Board is proposing to temporarily reduce license renewal fees to ensure compliance with existing law. Licensees would benefit from this proposal by temporarily lowering the cost to maintain their license.

This proposal would also amend subsections (b), (e), and (f), to remove outdated references to fees that were in effect before July 1, 2009. This amendment would remove unnecessary language and help avoid confusion.

C. Consistency and Compatibility with Existing State Regulations

After conducting a review for any regulations that would relate to or affect this area, the Board has evaluated this regulatory proposal and it is neither inconsistent nor incompatible with existing state regulations.

FISCAL IMPACT ESTIMATES

Fiscal Impact on Public Agencies Including Costs or Savings to State Agencies or Cost/Savings in Federal Funding to the State

By reducing the license renewal fee from \$400 to \$220 between July 1, 2015 and June 30, 2017, the LATC's annual revenue would decrease by approximately \$303,840 in FY 2015-16, and would also decrease by approximately \$303,840 in FY 2016-17. The LATC has sufficient reserves to cover this loss in revenue without adversely affecting any of its operations.

Nondiscretionary Costs/Savings to Local Agencies

None

Local Mandate

None

Cost to Any Local Agency or School District for Which Government Code Sections 17500-17630 Require Reimbursement

None

Business Impact

The Board has made an initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states.

AND

The following studies/relevant data were relied upon in making the above determination:

No businesses or individuals would incur any additional costs as a result of this proposal. This proposal, temporarily reducing license renewal fees, would save money for licensees. While this proposal would also raise the license renewal fee on July 1, 2017, it would only return to the prior level, thus incurring no additional costs.

The table below details the total estimated savings of the affected licensee population over the lifetime of the proposal.

Fiscal Year	* Estimated Total Annual Renewal Fee Revenue	* Estimated Revenue Savings
2013-14	\$675,200	N/A
2014-15	\$675,200	N/A
2015-16	\$371,360	\$303,840
2016-17	\$371,360	\$303,840
2017-18	\$675,200	N/A
Total Estimated Revenue Savings over Lifetime of Proposed Temporary License Renewal Fee Reduction:		\$607,680

* Estimate based on 3,376 licensee population

The savings realized by licensees is projected to be approximately \$303,840 annually or \$607,680 total over the two-year duration of the temporary license renewal fee reduction.

Cost Impact on Representative Private Person or Business

This proposal would reduce the fee for renewal of a license from \$400 to \$220 from July 1, 2015 through June 30, 2017. The license renewal fee would return to \$400 on July 1, 2017. Therefore, the agency is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

Effect on Housing Costs

None

EFFECT ON SMALL BUSINESS

The Board has determined that the proposed regulation would not affect small businesses because it only affects licensees.

RESULTS OF ECONOMIC IMPACT ASSESSMENT/ANALYSIS

Impact on Jobs/New Businesses

The Board has determined that this regulatory proposal will not have a significant impact on the creation of jobs or new businesses or the elimination of jobs or existing businesses or the expansion of businesses in the State of California. This determination was made because the proposed changes, which would spread approximately \$607,680 among nearly 3,400 licensees over the two-year duration of the proposal, are not sufficient to create or eliminate jobs or businesses.

Benefits of Regulation

The Board has determined that this regulatory proposal will have the following benefits to the health and welfare of California residents, worker safety, and the state's environment:

This regulatory proposal would benefit the welfare of California residents by spreading approximately \$607,680 among nearly 3,400 licensees over the two-year duration of the proposal. The majority of these licensees are California residents.

This regulatory proposal does not affect worker safety because it is not related to worker safety in any manner.

This regulatory proposal does not affect the state's environment because it is not related to the environment in any manner.

CONSIDERATION OF ALTERNATIVES

The Board must determine that no reasonable alternative it considered to the regulation or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposal described in this Notice, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Any interested person may present statements or arguments orally or in writing relevant to the above determinations at the above-mentioned hearing.

INITIAL STATEMENT OF REASONS AND INFORMATION

The Board has prepared an initial statement of the reasons for the proposed action and has available all the information upon which the proposal is based.

TEXT OF PROPOSAL

Copies of the exact language of the proposed regulations and of the initial statement of reasons, and all of the information upon which the proposal is based, may be obtained at the hearing or prior to the hearing upon request from the California Architects Board, Landscape Architects Technical Committee at 2420 Del Paso Road, Suite 105, Sacramento, California 95834, or by contacting the individuals listed below.

AVAILABILITY AND LOCATION OF THE FINAL STATEMENT OF REASONS AND RULEMAKING FILE

All the information upon which the proposed regulations are based is contained in the rulemaking file, which is available for public inspection by contacting the person, named below.

You may obtain a copy of the final statement of reasons once it has been prepared, by making a written request to the contact person named below or by accessing the website listed below.

CONTACT PERSON

Inquiries or comments concerning the proposed rulemaking action may be addressed to:

Name: John Keidel
Address: California Architects Board
Landscape Architects Technical Committee
2420 Del Paso Road, Suite 105
Sacramento, CA 95834
Telephone No.: (916) 575-7233
Fax No.: (916) 575-7283
E-mail Address: John.Keidel@dca.ca.gov

The backup contact person is:

Name: Trish Rodriguez
Address: California Architects Board
Landscape Architects Technical Committee
2420 Del Paso Road, Suite 105
Sacramento, CA 95834
Telephone No.: (916) 575-7230
Fax No.: (916) 575-7283
E-mail Address: Trish.Rodriguez@dca.ca.gov

Website Access: Materials regarding this proposal can be found at www.latc.ca.gov.

**CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE
ORIGINALLY PROPOSED LANGUAGE**

Amend Section 2649 of Division 26 of Title 16 of the California Code of Regulations to read as follows:

§ 2649. Fees.

The fees for landscape architect applicants and landscape architect licensees shall be fixed by the Board as follows:

(a) The fee for reviewing an eligibility application or an application to take the California Supplemental Examination is \$35.

(b) ~~The fee for the California Supplemental Examination is \$225. On or after July 1, 2009,~~ The fee for the California Supplemental Examination is \$275.

(c) The fee for a duplicate license is \$15.

(d) The penalty for late notification of a change of address is \$50.

(e) The fee for an original license is ~~\$300. For licenses issued on or after July 1, 2009, the fee for original license shall be~~ \$400.

(f) ~~The fee for a biennial renewal is \$300.~~ For licenses expiring on or after July 1, 2009, the fee for biennial renewal shall be \$400. For licenses expiring on or after July 1, 2015, the fee for biennial renewal shall be \$220. For licenses expiring on or after July 1, 2017, the fee for biennial renewal shall be \$400.

Note: Authority cited: Section 5630, Business and Professions Code. Reference cited: Section 5681, Business and Professions Code.

**STATE OF CALIFORNIA – DEPARTMENT OF CONSUMER AFFAIRS
CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE
INITIAL STATEMENT OF REASONS**

Hearing Date: **March 24, 2014**

Subject Matter of Proposed Regulation: **Fees**

Sections Affected: **California Code of Regulations (CCR), Title 16, Division 26, Section 2649**

As a result of legislative reorganization, the Landscape Architects Technical Committee (LATC), established on January 1, 1998, replaced the former Board of Landscape Architects and was placed under the purview of the California Architects Board (Board). Business and Professions Code (BPC) section 5630 authorizes the Board to adopt, amend, or repeal rules and regulations that are reasonably necessary in order to carry out the provisions under the Landscape Architects Practice Act.

Specific Purpose of Each Adoption, Amendment, or Repeal:

1. Problems Being Addressed:

Existing law, BPC section 5681, authorizes the LATC to charge a biennial license renewal fee. 16 CCR Section 2649 (Fees) specifies the biennial license renewal fee to be \$400. This regulatory proposal would amend 16 CCR Section 2649 to temporarily reduce this fee to \$220.

BPC section 128.5 requires agencies within the Department of Consumer Affairs (DCA) to reduce license or other fees if they have 24 months of funds in reserve at the end of any fiscal year (FY). As of January 2013, the LATC had 19.5 months of funds in reserve, which was approaching a level that would require LATC to take action in accordance with BPC section 128.5. To address the fund condition, the LATC approved revenue savings measures consisting of a negative budget change proposal to reduce LATC's spending authority by \$200,000, and a temporary license renewal fee reduction from \$400 to \$220 for one biennial license renewal cycle. In order to temporarily reduce license renewal fees, a regulatory change proposal to amend 16 CCR Section 2649 is necessary. This regulatory proposal would amend 16 CCR Section 2649, subsection (f), to reduce the fee for biennial renewal of a license from \$400 to \$220 for a period of two years, from July 1, 2015 through June 30, 2017, and will return to \$400 on July 1, 2017.

Additionally, this proposal would amend 16 CCR Section 2649 subsections (b), (e), and (f) to remove outdated references to fees that were in effect before July 1, 2009 since it is unnecessary and no longer relevant to specify these fees.

2. Anticipated Benefits from These Regulatory Actions:

As of January 2013, the LATC had 19.5 months of funds in reserve which the Board believes is too high in keeping with the law. The Board is proposing to temporarily reduce license renewal fees to ensure compliance with existing law. Licensees would also benefit from the temporary license renewal fee reduction by lowering the cost to maintain their license.

This proposal will also amend subsections (b), (e), and (f), to remove outdated references to fees that were in effect before July 1, 2009. This amendment will remove unnecessary language and help avoid confusion.

Factual Basis/Rationale

BPC section 128.5 requires DCA agencies to reduce license or other fees if they have 24 months of funds in reserve at the end of any FY. As of January 2013, the LATC had 19.5 months of funds in reserve, which was approaching a level that would require LATC to take action in accordance with BPC section 128.5. To address the fund condition, the LATC approved several revenue savings measures consisting of a negative budget change proposal to reduce LATC's spending authority by \$200,000, and a temporary license renewal fee reduction from \$400 to \$220 for one biennial license renewal cycle. In order to temporarily reduce license renewal fees, a regulatory change proposal to amend 16 CCR Section 2649 is necessary. This regulatory proposal would amend 16 CCR Section 2649, subsection (f), to reduce the fee for biennial renewal of a license from \$400 to \$220 for a period of two years, from July 1, 2015 through June 30, 2017, and would return to \$400 on July 1, 2017.

Additionally, this proposal would amend 16 CCR Section 2649 subsections (b), (e), and (f) to remove outdated references to fees that were in effect before July 1, 2009, since it is unnecessary and no longer relevant to specify these fees.

Underlying Data

The following documents are included as underlying data for this proposal:

1. Analysis of LATC Fund Condition, Status Quo Scenario; and
2. Analysis of LATC Fund Condition, Temporary License Renewal Fee Reduction and Negative Budget Change Proposal Scenario.

If the status quo is maintained, the LATC estimates license renewal fee revenue to be approximately \$675,200 for FY 2015-16, and approximately \$675,200 for FY 2016-17. This scenario assumes that the average number of licensees who pay the \$400 license renewal fee during a FY stays at approximately 1,688.

This proposal would reduce the license renewal fee from \$400 to \$220 from July 1, 2015 through June 30, 2017. Assuming that approximately 1,688 licensees pay the reduced license renewal fee of \$220 during a FY, the LATC estimates renewal fee revenue to be reduced to approximately \$371,360 for FY 2015-16, and approximately \$371,360 again for FY 2016-17.

This proposal would result in a revenue savings of approximately \$303,840 annually or \$607,680 total over the two-year duration of the temporary license renewal fee reduction.

The table below details the total estimated savings of the affected licensee population over the lifetime of the proposal.

Fiscal Year	* Estimated Total Annual Renewal Fee Revenue	* Estimated Revenue Savings
2013-14	\$675,200	N/A
2014-15	\$675,200	N/A
2015-16	\$371,360	\$303,840
2016-17	\$371,360	\$303,840
2017-18	\$675,200	N/A
Total Estimated Revenue Savings over Lifetime of Proposed Temporary License Renewal Fee Reduction:		\$607,680

* Estimate based on 3,376 licensee population

The savings realized by licensees is projected to be approximately \$303,840 annually or \$607,680 total over the two-year duration of the temporary license renewal fee reduction.

Business Impact

This regulation will not have a significant adverse economic impact directly affecting business, including the ability of California businesses to compete with business in other states, because it affects only licensees.

Economic Impact Assessment

This regulatory proposal will have the following effects:

- It will not create or eliminate jobs within the State of California because it would temporarily reduce the biennial license renewal fee for licensees. The estimated revenue savings that would be realized by this proposal, projected at approximately \$607,680 spread among approximately 3,400 licensees over the two-year duration of the proposal, is not sufficient to create or eliminate jobs or businesses.
- It will not create new business or eliminate existing businesses within the State of California because the proposed changes will not be of sufficient magnitude to have the effect of creating or eliminating businesses.
- This regulatory proposal does not affect the health and welfare of California residents because the proposed changes will not be of sufficient magnitude to have such an effect.
- It will not affect the expansion of businesses currently doing business within the State of California because the proposed changes will not be of sufficient magnitude to have the effect of creating or eliminating businesses.
- This regulatory proposal does not affect worker safety because it is not related to worker safety in any manner.
- This regulatory proposal does not affect the state’s environment because it is not related to the environment in any manner.

Benefits

The LATC is proposing to reduce its fund reserve to ensure compliance with existing law. This regulatory proposal would benefit the welfare of California residents by spreading approximately \$607,680 among approximately 3,400 licensees over the two-year duration of the proposal. The majority of these licensees are California residents who would benefit from the temporary license renewal fee reduction by lowering the cost to maintain their license.

This proposal would also amend subsections (b), (e), and (f), to remove outdated references to fees that were in effect before July 1, 2009. This amendment would remove unnecessary language and help avoid confusion.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

The Board has made an initial determination that no reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law than the proposal described in the Notice.

Set forth below are the alternatives which were considered and the reasons each alternative was rejected:

The only alternative considered was to maintain the status quo. This alternative was rejected as the status quo was not accomplishing the LATC's objective of reducing its fund reserve.

Initial Statement of Reasons - Underlying Data - Attachment 1

0757 - Landscape Architects Technical Committee Analysis of Fund Condition

Prepared 11/5/2013

(Dollars in Thousands)

Status Quo

	ACTUALS 2012-13	BY 2013-14	BY + 1 2014-15	BY + 2 2015-16	BY + 3 2016-17	BY + 4 2017-18
BEGINNING BALANCE	\$ 2,285	\$ 2,413	\$ 2,005	\$ 1,578	\$ 1,144	\$ 677
Prior Year Adjustment	\$ -2	\$ -	\$ -	\$ -	\$ -	\$ -
Adjusted Beginning Balance	\$ 2,283	\$ 2,413	\$ 2,005	\$ 1,578	\$ 1,144	\$ 677
REVENUES AND TRANSFERS						
Revenues:						
125600 Other regulatory fees	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2
125700 Other regulatory licenses and permits	\$ 85	\$ 66	\$ 66	\$ 66	\$ 66	\$ 66
125800 Renewal fees	\$ 702	\$ 675	\$ 675	\$ 675	\$ 675	\$ 675
125900 Delinquent fees	\$ 18	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17
141200 Sales of documents	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
142500 Miscellaneous services to the public	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
150300 Income from surplus money investments	\$ 7	\$ 6	\$ 5	\$ 22	\$ 13	\$ 3
150500 Interest Income from Interfund Loans	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
160400 Sale of fixed assets	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
161000 Escheat of unclaimed checks and warrants	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
161400 Miscellaneous revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Totals, Revenues	\$ 814	\$ 766	\$ 765	\$ 782	\$ 773	\$ 763
Transfers from Other Funds						
Transfers to Other Funds						
Totals, Revenues and Transfers	\$ 814	\$ 766	\$ 765	\$ 782	\$ 773	\$ 763
Totals, Resources	\$ 3,097	\$ 3,179	\$ 2,770	\$ 2,360	\$ 1,917	\$ 1,440
EXPENDITURES						
Disbursements:						
0840 State Controller (State Operations)	\$ 1	\$ -	\$ -	\$ -	\$ -	\$ -
1110 Program Expenditures (State Operations)	\$ 677	\$ 1,169	\$ 1,192	\$ 1,216	\$ 1,240	\$ 1,265
8880 Financial Information System for California (State Operations)	\$ 6	\$ 5	\$ -	\$ -	\$ -	\$ -
Total Disbursements	\$ 684	\$ 1,174	\$ 1,192	\$ 1,216	\$ 1,240	\$ 1,265
FUND BALANCE						
Reserve for economic uncertainties	\$ 2,413	\$ 2,005	\$ 1,578	\$ 1,144	\$ 677	\$ 175
Months in Reserve	24.7	20.2	15.6	11.1	6.4	1.6

Initial Statement of Reasons - Underlying Data - Attachment 2

**0757 - Landscape Architects Technical Committee
Analysis of Fund Condition**

Prepared 11/5/2013

(Dollars in Thousands)

Fee Decrease Scenario

Renewal Fee Decrease - \$400 ----> \$220 in FY 15-16

	ACTUALS 2012-13	BY 2013-14	BY + 1 2014-15	BY + 2 2015-16	BY + 3 2016-17	BY + 4 2017-18
BEGINNING BALANCE	\$ 2,285	\$ 2,413	\$ 2,005	\$ 1,578	\$ 1,038	\$ 463
Prior Year Adjustment	\$ -2	\$ -	\$ -	\$ -	\$ -	\$ -
Adjusted Beginning Balance	\$ 2,283	\$ 2,413	\$ 2,005	\$ 1,578	\$ 1,038	\$ 463
REVENUES AND TRANSFERS						
Revenues:						
125600 Other regulatory fees	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2	\$ 2
125700 Other regulatory licenses and permits	\$ 85	\$ 66	\$ 66	\$ 66	\$ 66	\$ 66
125800 Renewal fees	\$ 702	\$ 675	\$ 675	\$ 675	\$ 675	\$ 675
Renewal Fee Decrease - \$400 ----> \$220	\$ -	\$ -	\$ -	\$ -304	\$ -304	\$ -
125900 Delinquent fees	\$ 18	\$ 17	\$ 17	\$ 17	\$ 17	\$ 17
141200 Sales of documents	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
142500 Miscellaneous services to the public	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
150300 Income from surplus money investments	\$ 7	\$ 6	\$ 5	\$ 20	\$ 9	\$ 3
150500 Interest Income from Interfund Loans	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
160400 Sale of fixed assets	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
161000 Escheat of unclaimed checks and warrants	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
161400 Miscellaneous revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Totals, Revenues	\$ 814	\$ 766	\$ 765	\$ 476	\$ 465	\$ 763
Transfers from Other Funds						
Transfers to Other Funds						
Totals, Revenues and Transfers	\$ 814	\$ 766	\$ 765	\$ 476	\$ 465	\$ 763
Totals, Resources	\$ 3,097	\$ 3,179	\$ 2,770	\$ 2,054	\$ 1,503	\$ 1,226
EXPENDITURES						
Disbursements:						
0840 State Controller (State Operations)	\$ 1	\$ -	\$ -	\$ -	\$ -	\$ -
1110 Program Expenditures (State Operations)	\$ 677	\$ 1,169	\$ 1,192	\$ 1,216	\$ 1,240	\$ 1,265
Proposed Negative BCP	\$ -	\$ -	\$ -	\$ -200	\$ -200	\$ -200
8880 Financial Information System for California (State Operations)	\$ 6	\$ 5	\$ -	\$ -	\$ -	\$ -
Total Disbursements	\$ 684	\$ 1,174	\$ 1,192	\$ 1,016	\$ 1,040	\$ 1,065
FUND BALANCE						
Reserve for economic uncertainties	\$ 2,413	\$ 2,005	\$ 1,578	\$ 1,038	\$ 463	\$ 161
Months in Reserve	24.7	20.2	18.6	12.0	5.2	1.8