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P.1

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NOTE

From:

5/1/92

To: Rich Theroux

Gene Tierne

RE: I/M Scenarios you Requested

Attached are the emission reduction estimates and cost effectiveness calculations that you requested. Attachments One and Two show the benefits and cost effectiveness with two different assumptions about repair effectiveness. Attachment Three shows why: Of the 23 vehicles that passed the twospeed test after commercial repairs in our Indiana test program, only 12 passed the IM240. We are continuing to accumulate data on this and will be adjusting the repair effectiveness estimates in MOBILE5 accordingly. California has made similar (preliminary) findings in a large study they are conducting of the BAR90 program. So, Attachment One shows repair effectiveness levels based on this most recent data about repairs in Indiana. Attachment Two shows the MOBILE4.1 repair effectiveness levels.

EPA

In general, the cost-effectiveness estimates show the same basic outcome as we found earlier. In other words, the effect of the double amortization you requested only slightly increased the cost-effectiveness estimates. For example, our recommended enhanced program (biennial run #10) comes out at \$527 per ton without convenience costs added. With convenience costs added, the estimate is \$1636 per ton. The incremental cost-effectiveness of switching to our recommended program is negative (i.e., it saves money). In other words, for each million vehicles in an I/M area, our proposal will reduce actual I/M costs by about \$18 million and increase the VOC reductions by about 5,500 tons per year. Including convenience costs, the savings grows to about \$25 million per year. That is an additional savings of \$7 million per year per million vehicles in reduced convenience costs. Even under the most favorable assumptions for test&repair convenience, I think you can see that overcoming this margin of benefit will be difficult. For all enhanced I/M areas combined, the savings amounts to \$1.4 billion. That does not include the stationary source control savings.

Attachments One and Two show biennial and annual runs for test-only programs and for test&repair programs. In the test-only case, we added a run that you didn't request but that we felt was important for you to see. Run #10 portrays the maximum benefit we estimate is achievable from I/M, to provide you a reference point for our proposed minimum. We could easily justify an even tougher performance standard. Per your request, I amortized the costs twice. First, I amortized the capital costs over a 6 year period. Then I estimated test costs for each of the scenarios. The scenarios were then run and the cost outputs were annualized and amortized over a four year period. In the first year, 100% of the benefits were enjoyed, second year 50%, third year 25%, and fourth year 12%. No benefits are left after that year. Attachments Four and Five show the calculations to derive the cost inputs for each scenario. Attachment Six includes further details on the derivation of the test costs in Attachments Four and Five.

The following provides our response to the list of questions you posed:

1) For the test&repair IM240 runs we assumed a station would perform about 29,250 tests in five years, or about 2 vehicles per hour, 9 hours per day. 29,250 tests spread over one test lane would be maximizing the use of that lane and labor to run tests. In order to achieve higher through put in a test&repair lane, we would have to assume higher capital investment to automate and systematize the lane configuration. We assume only \$115,000 for the lane in the test&repair scenarios vs. 245,000 for test only lanes. In any case, the IM240 test&repair scenario essentially assumes no down-time on the lane.

2) All of the centralized programs listed on page 46 are competitively bid, contracted systems and are open to all comers. Once bids are received, the state in each of these cases awards the obligation/right to provide testing services at a fixed price for a fixed contractual period to a single contractor (except in Florida, which chose to award contracts to three different contractors in different urban areas or portions thereof). Of the decentralized programs listed, only California and New Mexico have a free market pricing system. Alaska, like all the other states, caps the test fee but in this case the cap is quite high - over \$30. It may be that most tests done in Alaska actually cover costs.

3) This cost has been addressed; see Attachment 6.

4) As discussed, the labor overhead was included in the "general overhead" category of the cost assumptions in the Technical Support Document. We used wage rate since most people relate to hourly rate more easily than total labor cost! For the purposes of the cost analysis done here, we removed labor overhead from the general overhead category and recalculated labor costs accordingly.

5) Instead of discounting emission reductions, I annualized and amortized costs for this analysis; see Attachment 6 for details. 6) See question 1 above and Attachment 6 for the discussion of test cost modeling.

7) As we've discussed, I do not think there is a convenience cost advantage to a decentralized network. I agree that there are differences between the two systems but the net effect is close enough to a wash to make not worth struggling over. The real convenience issue is test frequency and we want to cut that in half - dramatically lowering the convenience related costs of I/M over the current situation.

8) One source of data on the actual costs and types of repairs performed in I/M programs is the repairs contractor mechanics do in our test programs and another is data from states that collected good repair information. See Appendix I of I/M Costs, Benefits and Impacts for details on the types of repairs and the associated costs of evaporative system problems. Attachment 7 includes some data on typical repairs The and repair costs related to emission test failures. MOBILE model assumes that an I/M failure leads to an emission reduction that mainly depends on how dirty the vehicle is (super emitter, very high, etc. although not all vehicles return to the normal emitter level) and the technology of the vehicle. It does not assume a particular distribution of specific repairs. MOBILE4.1 does not differentiate repair effects on the basis of the test used and, in fact, assumes the repair effectiveness estimates for the IM240 are identical to the two-speed test. As discussed above, we are finding that this is not correct and we have provided you with updated assumptions about repair effectiveness for the steady-state tests. Deterioration (or decay) rates are not a function of test type but vehicle technology and age.

9) There are two components to the market failure. First, the average fuel economy benefit from the IM240 repair is under 13%. This is low enough to be missed by most motorists. Gasoline is so cheap that motorists don't bother monitoring fuel economy closely, if at all. The other component is a failure in the repair industry: mechanics don't know how to fix cars properly. When repairs are made, optimization for fuel economy (like emissions) is not the prime criterion - driveability is what most motorists are after and that may be in conflict with fuel economy. Finally, given the inability of mechanics to deal with engine problems, motorists that are aware of a fuel economy problem often are frustrated in their attempts to get the needed repair. The radio show "The Car Guys" and similar outlets for motorist frustration are indicative of the degree to which this is a problem. Improved testing, diagnostics, mechanic training, and mechanic certification resulting from our proposed I/M program will dramatically improve this situation.

I hope this helps you come to a rapid conclusion of your review. I am sure you will have questions - I will be available. We are hoping that we can announce on May 11 at the North American Motor Vehicle Emission Control Conference, which is hosted by State and local air pollution officials, that the rule has been released by OMB. They are very anxious to see a proposal. P 5

Attachment One

I/M BENEFITS

P.6

(Adjusted Repair Effectiveness on Steady State Tests)

		Emi	ssion Be	nefits	Cost Effe	ectiveness
		Per	cent Reduc	tion	Dollars	per Ton
					No	With
					Convenience	Convenience
	BIENNIAL TEST ONLY	VOC	00	NOx	Costs	Costs
1	Idle	4.7%	11.8%	^ *	\$5,387	\$12,054
2	Idle/Pressure	13.6%	11.8%	1	\$2,238	\$4,532
3	Two Speed	5.0%	13.0%	1	\$5,530	\$11,841
4	Two Speed/Pressure	13.9%	13.0%	1	\$2,404	\$4,654
5	Loaded	5.0%	13.1%	1	\$5,582	\$11,830
6	Loaded/Pressure	13.9%	13.1%	↑	\$2,380	\$4,623
7	IM240	15.5%	31.6%	7.5%	\$521	\$2,542
8	IM240/Pressure	21.9%	31.6%	7.5%	\$673	\$2,100
9	IM240/Pressure/Purge	28.2%	31.6%	7.5%	\$527	\$1,636
10	Maximum	32.7%	39.5%	7.5%	\$488	\$1,482
	ANNUAL TEST ONLY				<u> </u>	
1	Idle	5.4%	13.3%	1	\$7,992	\$19,586
2	Idle/Pressure	15.0%	13.3%	↑	\$3,498	\$7,686
3	Two Speed	5.7%	14.5%	1	\$8,394	\$19,397
4	Two Speed/Pressure	15.3%	14.5%	↑	\$3,834	\$7,942
5	Loaded	5.7%	14.6%	Ť	\$7,887	\$18,784
6	Loaded/Pressure	15.3%	14.6%	Î Î	\$3,562	\$7,655
7	IM240	17.5%	35.3%	8.5%	\$1,673	\$5,245
8	IM240/Pressure	24.3%	35.3%	8.5%	\$1,675	\$4,256
9	IM240/Pressure/Purge	31.0%	35.3%	8.5%	\$1,304	\$3,326
10	Maximum	36.1%	44.3%	8.5%	\$1,161	\$2,965
	BIENNIAL TEST & REPAIR				· · · ·	
1	idle	3.1%	7.1%	1	\$23,831	\$33,985
2	Idie/Pressure	7.6%	7.1%	1	\$10,991	\$15,130
3	Two Speed	3.2%	7.7%	1	\$23,425	\$33,155
4	Two Speed/Pressure	7.7%	7.7%	1	\$11,050	\$15,118
5	Loaded	3.2%	7.8%	1	\$24,723	\$34,375
6	Loaded/Pressure	7.7%	7.8%	1	\$11,588	\$15,642
7	IM240	9.7%	14.2%	3.8%	\$5,724	\$9,109
8	IM240/Pressure	12.7%	18.8%	3.8%	\$5,145	\$7,604
9	IM240/Purge/Pressure	15.9%	18.8%	3.8%	\$4,519	\$6,492
	ANNUAL TEST & REPAIR		ı	=		
1	Idie	3.4%	7.9%	<u>↑</u>	\$40,165	\$58,362
2	Idie/Pressure	8.2%	7.9%	Ŷ	\$18,547	\$26,161
3	Two Speed	3.6%	8.5%	Ť	\$39,631	\$57,085
4	Two Speed/Pressure	8.4%	8.5%	Ť	\$18,699	\$26,180
5	Loaded	3.6%	8.5%	1	\$41,025	\$58,352
6	Loaded/Pressure	8.4%	8.5%	1	\$19,275	\$26,733
7	IM240	10.7%	20.8%	4.3%	\$11,134	\$16,964
8	IM240/Pressure	13.9%	20.8%	4.3%	\$9,597	\$14,090
9	IM240/Purge/Pressure	17.3%	20.8%	4.3%	\$8,210	\$11,834

* Steady-state tests result in NOx increases

Attachment Two

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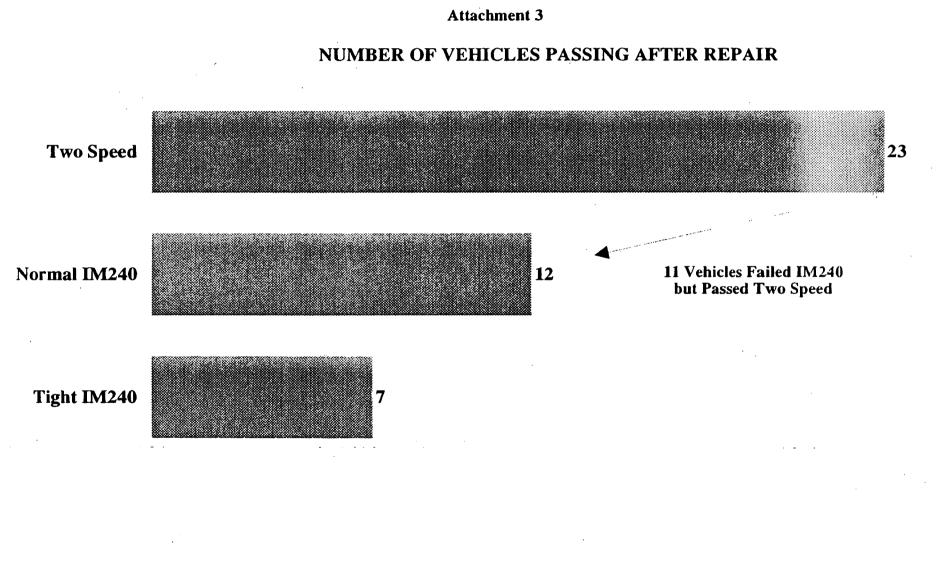
P.7

I/M BENEFITS

(MOBILE4.1 Equal Repair Effectiveness)

		Emi	ssion Be	nefits	Cost Effe	ectiveness
		Per	cent Reduc	tion	Dollars	per Ton
					No	With
	,				Convenience	Convenience
	BIENNIAL TEST ONLY	VOC	00	NOx	Costs	Costs
1	Idle	7.9%	21.3%	^ *	\$2,789	\$6,726
2	Idle/Pressure	16.9%	21.3%	Ť	\$1,622	\$3,474
3	Two Speed	8.5%	23.6%	Ť	\$2,822	\$6,514
4	Two Speed/Pressure	17.4%	23.6%	Ŷ	\$1,717	\$3,514
5	Loaded	8.6%	23.8%	î	\$2,848	\$6,497
6	Loaded/Pressure	17.5%	23.8%	Î	\$1,694	\$3,480
7	IM240	15.5%	31.6%	7.5%	\$521	\$2,542
8	IM240/Pressure	21.9%	31.6%	7.5%	\$673	\$2,100
9	IM240/Pressure/Purge	28.2%	31.6%	7.5%	\$527	\$1,636
10	Maximum	32.7%	39.5%	7.5%	\$488	\$1,482
	ANNUAL TEST ONLY					
1	Idle	9.4%	24.2%	1	\$4,226	\$10,915
2	Idle/Pressure	18.9%	24.2%	↑	\$2,575	\$5,886
3	Two Speed	9.9%	26.6%	↑	\$4,402	\$10,701
4	Two Speed/Pressure	19.5%	26.6%	↑	\$2,793	\$6,005
5	Loaded	10.1%	26.9%	Ť	\$4,107	\$10,336
6	Loaded/Pressure	19.6%	26.9%	↑	\$2,574	\$5,768
7	IM240	17.5%	35.3%	8.5%	\$1,673	\$5,245
8	IM240/Pressure	24.3%	35.3%	8.5%	\$1,675	\$4,256
9	IM240/Pressure/Purge	31.0%	35.3%	8.5%	\$1,304	\$3,326
10	Maximum	36.1%	44.3%	8.5%	\$1,161	\$2,965
	BIENNIAL TEST & REPAIR				· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
1	Idle	4.7%	11.9%	↑	\$15,210	\$21,833
2	Idle/Pressure	9.2%	11.9%	↑ T	\$8,858	\$12,258
3	Two Speed	5.0%	13.1%	Î	\$14,733	\$21,000
4	Two Speed/Pressure	9.5%	13.1%	Ť	\$8,789	\$12,094
5	Loaded	5.0%	13.2%	↑ ↑	\$15,535	\$62,500
6	Loaded/Pressure	9.5%	13.2%	↑	\$9,207	\$12,493
7	IM240	9.7%	14.2%	3.8%	\$5,724	\$9,109
8	IM240/Pressure	12.7%	18.8%	3.8%	\$5,145	\$7,604
9	IM240/Purge/Pressure	15.9%	18.8%	3.8%	\$4,519	\$6,492
	ANNUAL TEST & REPAIR					
1		5.4%	13.4%	1	\$25,067	\$36,576
2	Idle/Pressure	10.2%	13.4%	, ↑	\$14,741	\$20,866
3	Two Speed	5.7%	14.6%	Ť	\$24,443	\$35,363
4	Two Speed/Pressure	10.5%	14.6%	, ↑	\$14,690	\$20,644
5	Loaded	5.8%	14.7%	, 1	\$25,260	\$36,078
6	Loaded/Pressure	10.6%	14.7%	1	\$15,117	\$21,041
7	IM240	10.7%	20.8%	4.3%	\$11,134	\$16,964
8	IM240/Pressure	13.9%	20.8%	4.3%	\$9,597	\$14,090
9	IM240/Purge/Pressure	17.3%	20.8%	4.3%	\$8,210	\$11,834

* Steady-state tests result in NOx increases



			a da karangerende sere		Attachment	4				
				TEST-ON	LY NETWO	RK COSTS		ananta, transmitta		an an taon ta tatat tatata.
	Current Steady State	IM240 Pressure Purge	IM240 Pressure	iM240 Only	Loaded Pressure	Loaded	Two Speed Pressure	Two Sp ee d	ldle Pressure	idie On
Lanes per Station	4	4	4	4	4	4	4	4	4	
Vehicles per Lane (5 Years) Total Hours (5 Years)	195,000 15,600	117,000 15,600	117,000 15,600	117,000 15,600	156,000 15,600	156,000 15,600	117,000 15,600	117,000 15,600	156,000 15,600	156,000 15,600
Labor Costs										
Staff per Lane	2	3	3	2	3	2	3	2	3	2
Labor Cost	\$8.22	\$8.22	\$8.22	\$8.22	\$8.22	\$8.22	\$8.22	\$8.22	\$8.22	\$8.22
Per Test	\$1.32	\$3.29	\$3.29	\$2.19	\$2.47	\$1.64	\$3.29	\$2.19	\$2.47	\$1.64
apital and Equipment Costs										
Test Equipment	\$40,000	\$120,000	\$119,500	\$118,900	\$40,600	\$40,000	\$15,600	\$15,000	\$15,600	\$15,000
Other Capital Costs	\$215,000	\$245,000	\$245,000	\$215,000	\$245,000	\$215,000	\$245,000	\$215,000	\$245,000	\$215,00
Subtotal	\$255,000	\$365,000	\$364,500	\$333,900	\$285,600	\$255,000	\$260,600	\$230,000	\$260,600	\$230,00
Amortized at 10% for 6 years	\$340,134	\$486,859	\$486,192	\$445,376	\$380,951	\$340,134	\$347,604	\$306,788	\$347,604	\$306,78
Per Vehicle	\$1.74	\$4.16	\$4.16	\$3.81	\$2.44	\$2.18	\$2.97	\$2.62	\$2.23	\$1.97
Summary Test Cost										
Inspection Staff	\$1.32	\$3.29	\$3.29	\$2.19	\$2.47	\$1.64	\$3.29	\$2.19	\$2.47	\$1.64
State Oversight	\$1.25	\$1.75	\$1.75	\$1.75	\$1.75	\$1.75	\$1.75	\$1.75	\$1.75	\$1.75
Capital Costs	\$1.74	\$4.16	\$4.16	\$3.81	\$2.44	\$2.18	\$2.97	\$2.62	\$2.23	\$1.97
Other Costs	\$4.19	\$6.98	\$6.91	\$6.91	\$5.24	\$4.19	\$5.24	\$4.19	\$5.24	\$4.19
Total Cost per Test	\$8.50	\$16.18	\$16.11	\$14.66	\$11.90	\$9.76	\$13.25	\$10.75	\$11.68	\$9.55

5/1/92

					Attachment	5		•		
			T	EST AND R	EPAIR NET	WORK COS	TS			
	Current Cost Limited Steady State	IM240 Pressure Purge	IM240 Pressure	IM240 Only	Loaded Pressure	Loaded Only	Two Speed Pressure	Two Speed	idie Pressure	idie Oni
Vehicles per Lane (5 Years)	5,125	29,250	29,250	29,250	10,250	10,250	5,125	5,125	5,125	5,125
Total Hours (5 Years)	2,563	16,088	14,625	13,163	5,125	4,613	3,075	2,563	3,075	2,563
Labor Costs										
Labor Cost	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00
Per Test	\$7.50	\$8.25	\$7.50	\$6.75	\$7.50	\$6.75	\$9.00	\$7.50	\$9.00	\$7.50
pital and Equipment Costs/Lane										
Test Equipment	\$15,000	\$120,000	\$119,500	\$118,900	\$30,600	\$30,000	\$15,600	\$15,000	\$15,600	\$15,000
Other Capital Costs	\$20,000	\$115,000	\$115,000	\$115,000	\$60,000	\$60,000	\$30,000	\$30,000	\$30,000	\$30,000
Subtotal	\$35,000	\$235,000	\$234,500	\$233,900	\$90,600	\$90,000	\$45,600	\$45,000	\$45,600	\$45,000
Amortized at 10% for 6 years	\$35,000	\$313,457	\$312,790	\$311,990	\$120,848	\$120,047	\$60,824	\$60,024	\$60,824	\$60,024
Per Vehicle	\$6.83	\$10.72	\$10.69	\$10.67	\$11.79	\$11.71	\$11.87	\$11.71	\$11.87	\$11.71
Summary Test Cost										
Inspection Staff	\$7.50	\$8.25	\$7.50	\$6.75	\$7.50	\$6.75	\$9.00	\$7.50	\$9.00	\$7.50
State Oversight	\$2.00	\$6.00	\$6.00	\$5.00	\$6.00	\$5.00	\$6.00	\$5.00	\$6.00	\$5.00
Capital Costs	\$6.83	\$10.72	\$10.69	\$10.67	\$11.79	\$11.71	\$11.87	\$11.71	\$11.87	\$11.71
Other Costs	\$1.37	\$11.87	\$11.52	\$11.18	\$10.83	\$10.48	\$8.38	\$7.68	\$8.38	\$7.68
Total Cost Per Test	\$17.70	\$36.84	\$35.72	\$33.59	\$36.12	\$33.94	\$35.25	\$31.89	\$35.25	\$31.89

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Attachment Six

DERIVATION OF I/M TEST COSTS

TEST ONLY COSTS

- Based on your comments I revised the cost estimate methodology to pull the labor overhead costs out and adjust them separately from the throughput adjustment. I also pulled out all capital expenditure costs and amortized them over 6 years. The net effect of this is to reduce the estimated cost of our proposed program (i.e., the test-only, IM240, pressure, purge scenario). Remember that we were adjusting the labor overhead and other capital expenditure costs by 1.66, which, it turns out, is an overestimate.
- Test volume per lane is a function of the types of tests being performed. We assumed the use of second chance testing and extended preconditioning in the loaded, two speed and idle scenarios.
- Staffing per lane also varies by tests performed. Implementation of a pressure test is assumed to require a third position in the lane, requiring an additional inspector and a longer test lane (the alternative is to increase the test time, which would be less cost efficient and an unlikely choice). Staff costs are assumed to be the same per inspector regardless of the types of tests performed.
- Test equipment costs are pretty straight-forward. Other capital costs (building construction, etc.) are varied only to account for a longer test lane to accommodate three positions. Both of these costs are amortized over 6 years at 10%.
- State oversight costs are assumed to increase by 50¢ per test for all test-only scenarios.
- Other costs are adjusted by the throughput adjustment factor for the scenario.

TEST & REPAIR COSTS

- Vehicles per station for the idle and two-speed test were assumed identical to current decentralized. In the case of the loaded steady-state test scenarios, I assumed higher test volumes. The IM240 scenarios assume even higher test volumes.
- Labor costs are a function of the skill mix required and the number of hours spent doing testing. In a system where you have many stations and lanes, you can hire

specialists to do things like calibrate and maintain the equipment. In a low volume system, the inspector would have to take over the routine maintenance items and service contracts would be needed to cover more complex tasks.

- Labor costs per test are a function of the number of hours dedicated to the testing process. In a test&repair system, when the inspector wasn't doing a test, he or she might be doing other tasks, like repairs. In the test&repair IM240 scenarios, however, the test volume is such that a full-time inspector would be needed. In the case of the test-only scenarios, labor is dedicated to testing full time.
- Capital costs were dealt with in the same fashion as for test-only scenarios.
- State oversight costs vary depending on the station volume and the types of tests being performed.
- Other costs are also a function of types of tests and test volume. It is assumed that economies of scale are lost in lower volume systems.

Attachment Seven

P 13

REPAIR COSTS AND TYPES OF REPAIRS IN I/M PROGRAMS

The charts in this attachment come from a study EPA did in cooperation with the motor vehicle manufacturers. The charts on the first two pages show the kinds of problems found on vehicles that fail an I/M test and the contribution they make to emission reduction benefits. The tables on the subsequent pages are from the Wisconsin annual I/M report. They show, by model year, the kinds of repairs and the cost of repairs performed in the program on light duty vehicles. of the repaired vehicles. It was even more effective than the oxygen sensor at reducing HC per vehicle, at 1.11 g/mi, but only about 1/3 as effective at reducing CO.

P 14

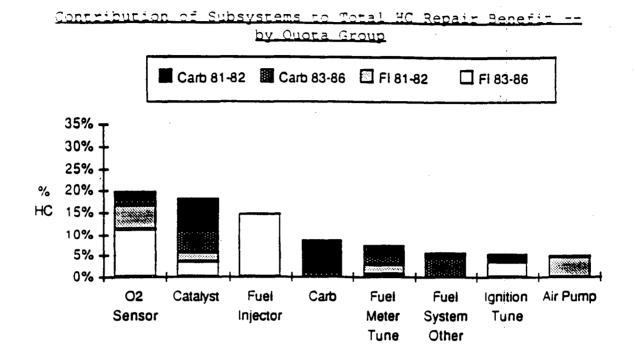
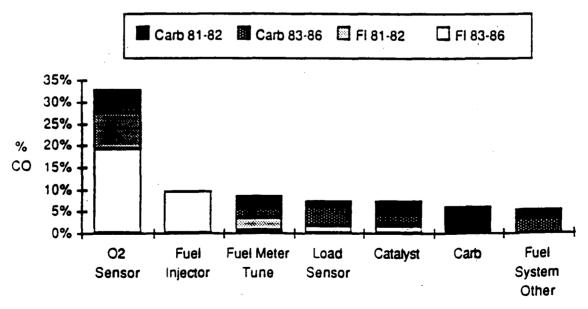


FIGURE 38

FIGURE 39

<u>Contribution of Subsystems to Total CO Repair Benefit --</u> by <u>Ouota Group</u>



sample size, the multiple regression tracked the averages of isolatable repairs closely.

P 15

Figures 34 and 35 chart the average emission reductions from the preceding table. Dark columns indicate those subsystems that have statistically significant reductions for that pollutant. The average reduction for all repairs -- not just the seven major ones -- is also included in the figures. See Appendix H for breakdowns of these figures by quota group.

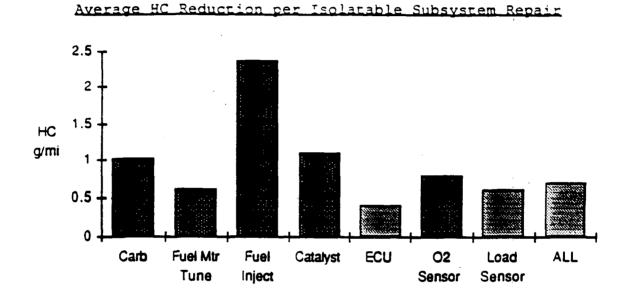
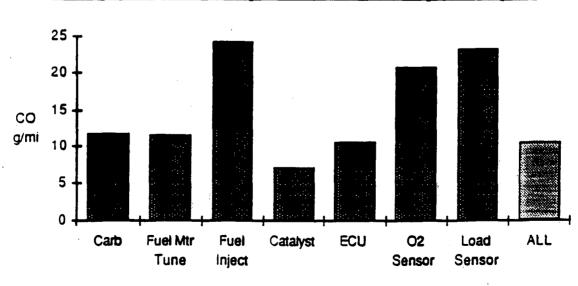




FIGURE 35



Average CO Reduction per Isolatable Subsystem Repair

		TRANS					č		·····			TERIA S					•••>	
EAR	TAMP INSP	THER AIR CLNR		575	CAT CONV	FILR		AVE	OSTS >555		COSTS	EAR >10 DF LO-M RANGE		***	EST COS COSTS AVE	T >\$55=* OF LO-M RANGE	1 DIF	
1989	5	··					2	73	68-77							•		6
1987 1986 1985		1 2 17	37				<u>18</u> 77 228	140 111 101	<u>55-536</u> 55-830 55-497					1 3 15	<u>46</u> 117 70		46 5 62 4	6 1 I
1984 1983	<u>501</u> 500 905	<u>53</u> 82 182	18 28 70				<u>464</u> 544 809	105	55-999 55-999 55-999					<u>35</u> 47 86	<u>56</u>	13- 1	40 4 75 5 06 2	<u>6 (</u>
1981 1980 1979	1198 1073 2760	236 233 602	<u>124</u> 96 132	<u>61</u> 54 233	25 58	<u>15</u> 10 71	1089 923	<u>107</u> 38 99	55-999 55-999 55-999					91 115 317	54 55 55	<u>15- 4</u> 1- 9	50 4 24 7 99 11	9. 1 ;
1978 1977 1977	<u></u>	422 247 158	56 29 38	178 121 77	31 20 17	45 30 30	2369 <u>1472</u> 599 303	90 91	54-999 25-789 12-477	296	48	1-	275	234 81 49	47 <u>45</u> 46 43	10- 5	50 25 50 15 54 19 50 15	<u>4 194</u> 9 1 •
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