

REPORT FROM THE PACIFIC FISHERY MANAGEMENT COUNCIL MEETING April 10 - 16, 2015

GROUNDFISH MANAGEMENT

Trawl Cost Recovery Report

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires NOAA's National Marine Fisheries Service (NMFS) to collect fees to recover the costs directly related to the management, data collection, and enforcement of a limited access privilege program (LAPP) (16 U.S.C. 1854(d)(2)), also called "cost recovery." The Pacific coast groundfish trawl rationalization program is a LAPP and consists of three sectors: the Shorebased Individual Fishing Quota (IFQ) Program, the Mothership (MS) Coop Program, and the Catcher/Processor (C/P) Coop Program.

In accordance with the Magnuson-Stevens Act and based on a recommended structure and methodology developed in coordination with the Council, NMFS collects mandatory fees of up to three percent of the ex-vessel value of groundfish by sector (Shorebased IFQ Program, MS Coop Program, and C/P Coop Program). NMFS collects the fees to cover the incremental costs of management, data collection, and enforcement of the trawl rationalization program. Incremental costs means those net costs that would not have been incurred but for the implementation of the trawl rationalization program. Cost recovery for the trawl rationalization program was implemented in January 2014.

The Council and advisory bodies received an Annual Report and presentations from NMFS on groundfish cost recovery rates. The annual report includes information on the fee percentage calculation, program costs, ex-vessel value by sector, and total fees collected by NMFS from previous years.

<u>Table 1</u>; Incremental costs associated with management, data collection, and enforcement of all sectors of the Trawl Rationalization Program, FY 2014 (October 1, 2014 to September 30, 2015). For FY 2015, NMFS only calculated incremental cost of personnel.

2013). Tor r 2013, NWI 3 only calculated incremental cost of personnel.					
Cost Category	West Coast	NW Fisheries	Office of Law	Total	
	Region	Science Center	Enforcement		
Shorebased IFQ	\$769,454.82	\$1,126,819.08	122,585.14	\$2,028,859.04	
Mother Ship	\$64,815.94	\$126,169.57	\$42,315.28	233,300.78	
Catcher Processor	\$62,489.66	\$68,682.62	\$27,459.22	\$158,631.49	
Total	\$896,760.42	\$1,331,671.43	\$192,359.64	\$2,420,359.64	

Because participants in the trawl rationalization program are subject to substantial economic pressures, and are vulnerable from a variety of regulatory, economic, and market forces, and because their continuing viability is subject to cumulative impacts, the subject of cost recovery received a great amount of attention. The Council asked that future reports include a breakdown of cost categories into more specific tasks, and identification of initial and increasing cost savings resulting from the trawl rationalization program. With increased transparency and efficiency, significant cost savings should be achieved in a rationalized fishery.

Groundfish Essential Fish Habitat (EFH) Amendment Scoping, Including Rockfish Conservation Area (RCA) and Area Adjustments

In December 2010, the Council initiated a review of Pacific Coast groundfish EFH. Groundfish EFH was most recently designated in 2005, as part of Amendment 19 to the Groundfish Fishery Management Plan (FMP). The current EFH review was completed in March 2014, at which time the Council determined that new and newly-available information warranted consideration of changes to the existing components of groundfish EFH.

In response to a request for proposals issued in 2013, there were eight public proposals submitted to the Council for consideration of changes to elements of groundfish EFH. Some of the proposals have been withdrawn, however the April Briefing Book included a comment letter from Oceana urging the Council to include the comprehensive conservation proposal that they previously submitted. In addition, a National Marine Sanctuaries Report and public comment from the Sanctuary requested the Council continue to include the Monterey Bay National Marine Sanctuary proposal in the EFH scoping process.

Ultimately, the Council identified and adopted the following issues to be moved forward. This will limit the scope and assist with development of alternatives to be considered in the future:

- 1. Identification and Distribution (EFH habitat components): Update in Appendix B of the Groundfish FMP).
- Identification and Distribution (EFH spatial extent): Retain within the scope of issues to be advanced.
- 3. Adverse effects of MSA and non-MSA fishing activities on EFH, and minimization measures: Retain within the scope of issues to be advanced, with the exception of:
 - Creation of marine reserves for the drift gillnet fishery in the Greenpeace proposal;
 - b. Further changes to "no bottom contact EFH conservation areas"; and
 - c. Application of EFH conservation areas to midwater trawl fisheries.
- 4. Non-fishing effects and conservation measures: Retain within the scope of issues to be advanced.
- **5.** Cumulative Impacts: Include this as part of the National Environmental Policy Act analysis.
- 6. Conservation and Enhancement: Do not include this in the scope of issues to be advanced.
- **7. Prey Species:** Update Appendix B to the Groundfish FMP, but do not include this within the scope of issues to be advanced.
- 8. Habitat Areas of Particular Concern: Do not include this within the scope of issues to be advanced.
- **9.** Research and Information Needs: Retain this within the scope of issues to be advanced. Move prioritized research recommendations from the FMP to an Appendix, to allow for future updates to research and data needs without an FMP amendment.
- **10. Review and Revise Process:** Retain this within the scope of issues to be advanced. Request that Council staff and NMFS explore how a more detailed description could be

developed to implement the process described in the FMP, e.g., through a Council Operating Procedure.

- **11. Comprehensive trawl RCA adjustments:** Retain this within the scope of issues to be advanced.
- **12. Allow Year-round Midwater Non-Whiting Fishery:** Consider this issue through the 2017-2018 biennial specifications and management process.
- **13. Remove Small Footrope Restrictions Shoreward of the RCA:** Consider this issue through the appropriate biennial specifications and management process with a focus on retaining a small footrope requirement shoreward of a depth contour delineated by coordinates (e.g., the 100-fathom line), and remove any references to the RCA.
- **14. Close the 60-Mile Bank to Reduce Cowcod Bycatch:** Do not include this within the scope of issues to be advanced.
- **15. Fishing in More than One Individual Fishing Quota (IFQ) Area:** Do not include this within the scope of issues to be advanced.
- **16. Eliminate the Selective Flatfish Trawl Requirement Shoreward of the RCA:** Consider this issue through either the Gear Regulations Package or the 2017-2018 biennial specifications and management process.

In addition, the Council adopted the following provisions:

- Ensure clear descriptions of the purpose and need for EFH protection that are separate and distinct from the purpose and need for any proposed modifications to RCAs and/or Groundfish Conservation Areas, as well as any area modifications for the purposes of protecting corals and sponges, as needed.
- Relative to the midwater trawl fisheries (both whiting and non-whiting), request that
 the industry voluntarily avoid contacting the bottom with trawl gear in EFH conservation
 areas, continue to monitor and estimate whether bottom contact occurred in a manner
 similar to what was presented in NMFS Informational Report 4 (in the April 2015
 briefing book), and assess whether regulatory measures relative to the use of midwater
 trawl gear in EFH conservation areas should be considered in the future, as appropriate.
- For all issues that will be advanced, request that NMFS identify the appropriate authority for rulemaking, and provide a report to the Council at its June meeting.
- Request an update and preliminary description of the 'collaborative proposal' for the June Council meeting, with final 'collaborative proposal' to be provided at the September Council meeting. [Representatives from the groundfish trawl fishery and conservation groups are working on a 'collaborative proposal' to recommend removal of the Trawl RCA and enhanced EFH areas on a coastwide basis.]
- Request the Project Team to move forward with developing draft alternatives, including a placeholder for the 'collaborative proposal' and proposals to implement EFH closures within the current RCAs, and provide draft alternatives at the September Council meeting.
- Request that NMFS develop groundfish fishing intensity maps that reflect a more recent timeframe and post-trawl IFQ program implementation (2011-2014) and a synthesis of the proposals that were submitted in 2013.

Final Action on Widow Rockfish Reallocation and Divestiture Issues

Under Amendment 20 of the Pacific Coast Groundfish Fishery Management Plan (the trawl rationalization program), overfished species, such as widow rockfish, were allocated to permit holders based on the Quota Share (QS) allocation of the target species QS with which widow rockfish is incidentally caught.

At its June 2011 meeting, the Council finalized recommendations on Amendment 20 and related regulatory actions, including:

- Provisions which prohibited QS trading during the initial years of the program.
- A deadline by which an individual must divest of any QS they are initially allocated in excess of QS control limits.
- A provision for consideration of the reallocation of overfished species QS upon the attainment of rebuilt status. [Amendment 20 states] When an overfished species is rebuilt or a species becomes overfished there may be a change in the QS allocation within a sector (allocation between sectors is addressed in the intersector allocation process). When a stock becomes rebuilt, the reallocation will be to facilitate the reestablishment of historic target fishing opportunities.

On March 28, 2013, NMFS published a rule which provided for the start of QS trading for all species except widow rockfish, for which the trading moratorium was continued while widow rockfish QS reallocation was reconsidered.

At its September 2014 meeting, the Council:

- Prioritized the consideration of widow rockfish QS reallocation for action, with completion of Council action scheduled for 2014; and,
- Decided to consider the delay of the divestiture deadline as part of its consideration of the widow rockfish QS reallocation.

At its November 2014 meeting the Council adopted a range of widow rockfish reallocation alternatives for analysis and public review.

Widow Rockfish Reallocation

At the April 2015 meeting, the Council selected widow reallocation Alternative 2 that uses a modified version of the Amendment 20 target species allocation formula as its Final Preferred Alternative. Under Alternative 2:

- QS is reallocated among the QS accounts based on the history of the LE trawl permits which were used to establish the accounts when the catch share program was first implemented under Amendment 20 (QS will not be reallocated to the current owners of the LE trawl permits except to the extent that the current QS account owners still own the permits originally used to establish the QS accounts). In situations for which QS allocations to multiple permits were combined into a single QS account at the time of initial allocation, the history of each permit will be evaluated individually, as was done under Amendment 20.
- Ten percent of all widow rockfish QS is set-aside for Adaptive Management.

- A pool of QS determined using the 1994-2003 whiting and nonwhiting trip widow landings history from Federal limited entry groundfish permits that were retired through the Federal buyback program, is divided equally among all permits.
- The remainder is divided between allocations for whiting and nonwhiting trips
 - \circ $\,$ Allocation based on landings 1994-2003 history for whiting trips
 - Allocation based on landings 1994-2002 history for non-whiting trips
 - Suboptions for determining portions allocated for whiting vs. nonwhiting trips.

<u>Suboption (a)</u>: Use an (Annual Catch Limit) ACL of 2,000 mt (the widow ACL adopted for the 2016 fishery). Apply Amendment 21 allocation rules to the 2016 widow ACL in order to determine the split of widow rockfish QS between whiting and nonwhiting trips. <u>Suboption (b)</u>: Use an ACL of 3,790 mt. Same as Suboption a, but use as an ACL an amount equivalent to the 2016 ABC.

The Council was unable to decide between suboption (a) or (b), and finally selected a compromise such that individual permits will receive an amount that is a midpoint between what they would have received under suboption (a) as compared to suboption (b).

NMFS will need to publish a proposed and final rule that will change the allocation formula for widow rockfish and remove the moratorium on widow rockfish QS trading. This rulemaking and implementation process will take at least until January 1, 2017.

Divestiture Deadline

Amendment 20 includes control limits for all species individually (5.1 percent for widow rockfish) and an aggregate control limit for nonwhiting species (2.7 percent in aggregate). All persons controlling QS are required to divest down to these limits by November 30, 2015 for all species except widow rockfish. Any QS of other species held in excess of these limits will be forfeited (forced divestiture).

To address this, the Council adopted a final preferred option that changes the divestiture deadline for widow rockfish to a date 12 months after implementation of the QS reallocation. For the aggregate control limit, the final preferred option maintains status quo; All entities must be at or below the aggregate nonwhiting QS control limit by November 30, 2015 as required under current regulation; except in the event reallocation puts anyone above that aggregate limit, they will have until the widow QS divestiture deadline to bring themselves back within the aggregate QS control limit.

Finally, the Council recommended that an opportunity be provided for QS owners to divest themselves of QS by abandoning that QS prior to the divestiture deadline, and allowing the abandoned QS to be redistributed to other QS accounts in proportion to the QS holdings for that species in those accounts.

Blackgill and Slope Rockfish Reallocation

Amendment 21 to the Groundfish Fishery Management Plan was approved in 2010 and establishes long-term (not) allocations between the Trawl and Non-Trawl sectors of the groundfish fishery. Under status quo, blackgill rockfish are managed as part of the Slope

Rockfish complex, meaning that in establishing harvest guidelines (HG) or ACLs, the Amendment-21 allocation for slope rockfish (63% trawl: 37% non-trawl) is applied. This allocation was based on the years 2003-2005 and included all slope rockfish south of 40°10' N latitude.

The Council has undertaken a process to:

- 1. Remove blackgill rockfish from the Slope Rockfish complex south of 40°10' N lat. to allow more refined and conservative management of this stock.
- 2. Make sector allocations of southern blackgill rockfish, and reallocate the remaining Slope Rockfish complex south of 40°10' N lat. between sectors.
- 3. Allocate QS of blackgill rockfish, and reallocate QS of the remaining Slope Rockfish complex south of 40°10' N lat. to permittees in the limited entry trawl individual fishing quota fishery for those permits with southern Slope Rockfish quota.

The Council states the specific purpose of the action is:

- To reduce the risk of exceeding the blackgill rockfish Over Fishing Limit (OFL) contribution and HG south of 40°10' N lat. projected in the most recent stock assessment conducted in 2011. The need for the action is to provide greater resource protection for blackgill rockfish south of 40°10' N lat. while minimizing disruption of current fisheries.
- 2. To ensure an equitable allocation of the harvestable surplus of blackgill rockfish and the Slope Rockfish South complex in the event blackgill rockfish is removed from the complex and managed with stock-specific harvest specifications.

However, the 2011 stock assessment indicated the spawning stock biomass south of 40°10' N lat. was at a depletion of 30% of unfished biomass at the start of 2011, or in the precautionary zone below the target biomass of 40%. As a result, cumulative landing limits of blackgill rockfish for non-trawl sectors designed to remove any incentive to target blackgill rockfish were implemented in 2013. The limits were reduced to the point that only enough fish were made available to accommodate incidental bycatch in the directed groundfish fisheries that traditionally occur below Point Conception, such as the shortspine thornyhead, sablefish, and slope rockfish fisheries.

The southern California non-trawl fixed gear fleet (Limited Entry & Open Access) has been severely impacted by the reduced blackgill rockfish trip limits, and those fishermen have complained that the current blackgill trip limits are restricting their access to all of the traditional fixed gear fisheries, in particular the shortspine thornyhead and slope rockfish fisheries. In addition, unaccounted for discarding is occurring in the non-trawl sector when blackgill rockfish are encountered.

The Council's Groundfish Advisory Subpanel (GAP) was scheduled to address this issue on Sunday, April 12, for an agenda specified 1.5 hours. However, the GAP Chairman denied consideration and instead assigned the task of preparing a GAP statement to a GAP fixed gear representative and a member of the public. Sacrificing the public process, the two met in private. The Council adopted the range of blackgill and slope rockfish allocation alternatives recommended by the GAP for detailed analysis. Those alternatives are:

Table 2; Blackgill and Slope Rockfish Inter-Sector Allocation Alternatives			
No Action	Blackgill rockfish south of 40°10' N lat. are not removed from the southern Slope Rockfish complex and the Amendment 21 formal sector allocation of 63% of the annual harvestable surplus (as defined by the fishery HG) of southern Slope Rockfish to LE trawl sectors and 37% of the annual harvestable surplus to non- trawl sectors is maintained. The current allocation of southern Slope Rockfish QS to permittees in the LE trawl fishery remain unchanged under the No Action Alternative.		
Alternative 1	Blackgill rockfish south of 40°10' N lat. are removed from the southern Slope Rockfish complex and the southern Slope Rockfish complex harvestable surplus minus blackgill rockfish, as well as the harvestable surplus of blackgill rockfish, are allocated to groundfish sectors based on 2003-2013 total catch shares to sectors. The allocations under this alternative would be 91% of the annual harvestable surplus (as defined by the fishery HG) of southern Slope Rockfish minus blackgill to LE trawl sectors and 9% of the annual harvestable surplus to non-trawl sectors. The annual harvestable surplus of blackgill rockfish would be allocated 41% to LE trawl sectors and 59% to non-trawl sectors.		
Alternative 2	Blackgill rockfish south of 40°10' N lat. are removed from the southern Slope Rockfish complex and the southern Slope Rockfish complex harvestable surplus minus blackgill rockfish, as well as the harvestable surplus of blackgill rockfish, are allocated to groundfish sectors based on 2011-2013 total catch shares to sectors. The allocations under this alternative would be 86.5% of the annual harvestable surplus (as defined by the fishery HG) of southern Slope Rockfish minus blackgill to LE trawl sectors and 13.5% of the annual harvestable surplus to non-trawl sectors. The annual harvestable surplus of blackgill rockfish would be allocated 35.6% to LE trawl sectors and 64.4% to non-trawl sectors.		
Alternative 3 (new sub- option)	Blackgill rockfish south of $40^{\circ}10'$ N lat. are removed from the southern Slope Rockfish complex and the harvestable surplus of blackgill rockfish, are allocated 50% to the LE trawl sector, and 50% to the non-trawl sector.		

Table 3; LE Trawl Sector Blackgill and Slope Rockfish QS Allocation Alternatives				
Alternative 1	Individual QS allocations of blackgill rockfish and the remainder of the southern Slope Rockfish complex to LE trawl permits are based on 1994-2003 landings history under two equal sharing options: 1) equal allocation of the buyback permits' landings history portion; 2) 50% of the QS allocated equally. The LE trawl sector allocation under this alternative was apportioned using each of these individual allocation options to estimate QP allocations available to LE trawl permit owners.			
Alternative 2	Individual QS allocations of blackgill rockfish and the remainder of the southern Slope Rockfish complex to LE trawl permits are based on 2003-2014 landings history under two equal sharing options: 1) equal allocation of the buyback permits' landings history portion; 2) 50% of the QS allocated equally. The LE trawl sector allocation under this alternative was apportioned using each of these individual allocation options to estimate QP allocations available to LE trawl permit owners.			

Inseason Adjustments Including Carryover and Regulatory Amendment

The Council adopted big skate trip limits for the shorebased IFQ fishery. The limits are:

- 15,000 lbs. for the month of June
- 20,000 lbs. per two months for periods four, five, and six.

The Council recommended that NMFS issue surplus carryover for all non-whiting IFQ species where the ACL is less than the acceptable biological catch (ABC), including sablefish north of 36° N. latitude. Surplus carryover for petrale sole is not eligible under the current NMFS policy given that the ACL is equal to the ABC. The Council recommended NMFS issue eligible carryover pounds up to the point where the ACL plus surplus carryover equals the ABC.

SALMON MANAGEMENT

Final Action on 2015 Ocean Salmon Management Measures

The Council adopted final management measures for 2015 ocean salmon fisheries. South of Cape Falcon season alternatives are as follows:

TABLE 1. Commercial troll management measures adopted by the Council for non-Indian ocean salmon fisheries, 2015.
A. SEASON ALTERNATIVE DESCRIPTIONS
South of Cape Falcon
Cape Falcon to Humbug Mt.
April 1-August 27;
September 2-30.
Seven days per week, All salmon except coho. Chinook minimum size limit of 28 inches total length. All vessels fishing in the area must land their fish in the State of Oregon. Beginning September 2, no more than 60 Chinook per vessel per landing week (Thursday through Wednesday). In 2016, the season will open March 15 for all salmon except coho. Chinook minimum size limit of 28 inches total length. Gear restrictions same as in 2015. This opening could be modified following Council review at its March 2016 meeting. Humbug Mt. to OR/CA Border (Oregon KMZ)
· April 1-May 31;
 June 1 through earlier of June 30, or a 1,800 Chinook quota;
July 1 through earlier of July 31, or a 1,000 Chinook quota;
August 1 through earlier of August 27, or a 500 Chinook quota.
Seven days per week. All salmon except coho. Chinook minimum size limit of 28 inches total length. Prior to June 1, all fish caught in this area must be landed and delivered in the State of Oregon. June 1 through August 29, single daily landing and possession limit 30 Chinook per vessel per day. Any remaining portion of the June and/or July Chinook quotas may be transferred inseason on an impact neutral basis to the next open quota period. All vessels fishing in this area must land and deliver all fish within this area or Port Orford, within 24 hours of any closure of this fishery, and prior to fishing outside of this area. Oregon State regulations require all fishers landing salmon from any quota managed season within this area to notify Oregon Dept. of Fish and Wildlife (ODFW) within 1 hour of delivery or prior to transport away from the port of landing by either calling (541) 867-0300 ext. 252 or sending notification via e-mail to KMZOR.trollreport@state.or.us. Notification shall include vessel name and number, number of salmon by species, port of landing and location of delivery, and estimated time of delivery. In 2016, the season will open March 15 for all salmon except coho, with a 28 inch Chinook minimum size limit. This opening could be modified following Council review at its March 2016 meeting. OR/CA Border to Humboldt South Jetty (California KMZ)
• September 11 through earlier of September 30, or a 3,000 Chinook quota.
Five days per week, Friday through Tuesday. All salmon except coho. Chinook minimum size limit of 28 inches total length. Landing and possession limit of 20 Chinook per vessel per day. All fish caught in this area must be landed within the area and within 24 hours of any closure of the fishery and prior to fishing outside the area. When the fishery is closed between the OR/CA border and Humbug Mountain and open to the south, vessels with fish on board caught in the open area off California may seek temporary mooring in Brookings, Oregon prior to landing in California only if such vessels first notify the Chetco River Coast Guard Station via VHF channel 22A between the hours of 0500 and 2200 and provide the vessel name, number of fish on board, and estimated time of arrival (C.6).
Humboldt South Jetty to Horse Mt.
Closed. Horse Mt. to Point Arena (Fort Bragg)
horse million of one Arona (Fort Blagg)

• May 1-31;
• June 15-30;
• July 12-31;
August 1-26;
September 1-30.
Seven days per week. All salmon except coho. Chinook minimum size limit of 27 inches total length. All fish must be landed in California and offloaded within 24 hours of the August 29 closure. When the CA KMZ fishery is open, all fish caught in the area must be landed south of Horse Mountain. During September, all fish must be landed north of Point Arena. In 2016, the season will open April 16-30 for all salmon except coho, with a 27 inch Chinook minimum size limit and the same gear restrictions as in 2015. All fish caught in the area must be landed in the area. This opening could be modified following Council review at its March 2016 meeting. Pt. Arena to Pigeon Pt. (San Francisco)
• May 1-31;
• June 7-30;
• July 8-31;
August 1-29;
September 1-30.
Seven days per week. All salmon except coho. Chinook minimum size limit of 27 inches total length prior to September 1, 26 inches thereafter. All fish must be landed in California and offloaded within 24 hours of the August 29 closure. During September, all fish must be landed south of Point Arena.
Point Reyes to Point San Pedro (Fall Area Target Zone)
October 1-2, 5-9, and 12-15.
All salmon except coho. Chinook minimum size limit of 26 inches total length. All fish caught in this area must be landed between Point Arena and Pigeon Point.
Pigeon Point to Point Sur (Monterey North)
• May 1-31;
• June 7-30;
・ July 8-31;
August 1-15.
Seven days per week. All salmon except coho. Chinook minimum size limit of 27 inches total length. All fish must be landed in California.
Point Sur to U.S./Mexico Border (Monterey South)
• May 1-31;
• June 7-30;
• July 8-31.
Seven days per week. All salmon except coho. Chinook minimum size limit of 27 inches total length. All fish must be landed in California.

ADMINISTRATIVE

Future Council Meeting Agenda and Workload Planning

The next meeting of the Pacific Fishery Management Council is scheduled for June 10 - 16, 2015. The Preliminary Proposed Agenda represents the agenda expectations for the June 2015 Council meeting and includes among other things:

Groundfish

- 1. Permit Stacking (Sablefish Tier) Cost Recovery Report
- 2. Salmon ESA Reconsultation Update
- 3. Blackgill & Slope Rockfish Reallocation (check-in)
- 4. Adopt 2017-2018 Spex Process
- 5. Essential Fish Habitat Update

- 6. Adopt Final Stock Assessment & Catch Reports
- 7. Rebuilding Revision Rules ROA
- 8. Consider Inseason Adjustments & FPA for Regulatory Amendment to Manage Set-Asides

Highly Migratory Species

- 1. International Issues
- 2. Albacore Management Strategy Evaluation
- 3. Resubmitted EFP Final Approval
- 4. Swordfish Management & Monitoring Plan Hardcaps

<u>Administrative</u>

1. Future Council Meeting Agenda and Workload Planning

This report is provided to the Central Coast Community in 2015 via a grant to the Morro Bay Community Quota Fund from the Central California Joint Cable Fisheries Liaison Committee. Any interested parties may request an email copy of future reports (as long as funding continues) by contacting Christopher Kubiak at, <u>ckub@sbcglobal.net</u>

Prepared April 23, 2015 By: Christopher Kubiak The Power of Being First With Innovation