

Report to Congressional Requesters

September 1992

JORDAN

Suspension of U.S. Military Assistance During Gulf Crisis





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United States General Accounting Office Washington, D.C. 20548

National Security and International Affairs Division

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September 25, 1992

The Honorable David R. Obey
Chairman
The Honorable Mickey Edwards
Ranking Minority Member
Subcommittee on Foreign Operations,
Export Financing and Related Programs
Committee on Appropriations
House of Representatives

In response to your request, we (1) reviewed the policy related to the delivery of defense articles to Jordan under the security assistance program from August 1, 1990, through August 1, 1991; (2) determined whether deliveries were terminated at any time during that period; (3) identified the number and types of defense articles that were delivered; (4) identified defense articles procured, but not delivered, and their current status; and (5) examined whether Congress was adequately informed of these actions. Per subsequent discussion with the Subcommittee staff, we compared the suspension of military assistance to Jordan with that of Peru.

Background

The United States has maintained a favorable relationship with Jordan because of its stabilizing influence in the Middle East and efforts to reach a peace settlement in the region. Since 1951, the United States has allocated about \$3.5 billion in foreign economic and military aid to Jordan. Since 1990, Jordan has received \$108 million in U.S. foreign military assistance grants to finance acquisition of U.S. military articles, services, and training.

The Department of State has overall responsibility for security assistance programs. Under the Arms Export Control Act (22 U.S.C. 2778) and the Foreign Assistance Act of 1961, as amended, the Department controls the export of defense articles and services to countries eligible to receive U.S. military assistance. The Department regulates the Foreign Military Sales (FMS) program through the issuance of licenses and other written approvals and can deny or revoke them without prior notice. The Department of Defense (DOD), through its Defense Security Assistance Agency (DSAA), implements the transfer of defense articles and services to eligible countries after approval from the State Department. Finally, the U.S. Customs Service ensures compliance with licensing and other requirements for the export of defense articles under the International Traffic in Arms Regulations.

During the Persian Gulf crisis, the United States was uncertain how to proceed with Jordan's security assistance program. King Hussein did not approve of Iraq's invasion of Kuwait and worked toward attempts to negotiate a withdrawal short of war. But after economic sanctions failed to encourage Iraq to withdraw and the United Nations (U.N.) authorized the use of force to liberate Kuwait, the King, faced with a potential uprising of a large Palestinian population with allegiance to Saddam Hussein, became openly critical of the U.S. and Operation Desert Storm. Hence, while maintaining that Iraq should withdraw from Kuwait, Jordan did not join the international coalition forces to liberate Kuwait. Moreover, because of its substantial economic ties with Iraq, Jordan did not fully support the U.N. sanctions and continues today to import oil from Iraq.

Early in the conflict, there were reports of transshipment of defense articles from Jordan to Iraq and on Jordan's compliance with U.N. sanctions against Iraq. A classified supplement to this report addresses these issues in more detail. Against this background, in the fall of 1990, the State Department began to take action to elicit a more favorable stance from the Jordanian leadership but at the same time did not want to cause economic or military instability within Jordan.

Results in Brief

The actions taken by the State Department to suspend military assistance to Jordan were of short duration and not well implemented. In addition, DOD's delays in notifying the military services of the suspension resulted in deliveries of defense articles to Jordan's freight forwarder and deliveries of ammunition-related defense articles¹ to Jordan when restrictions were in effect.

- State Department records state that, as of August 2, 1990, the Department placed a hold on the approval of all new FMS letters of offer and acceptance (LOA) for Jordan. However, we found that 12 new letters were approved through October 4, 1990, including 105-millimeter cartridges and repair and return of Cobra missile components. State Department officials claim that a hold was not placed on the approval of new LOAs for Jordan until October 2, 1990, but they could not provide evidence to support this date.
- The State Department did not suspend all licenses and other written approvals for the export of defense articles to Jordan until February 6, 1991. This suspension remained in place for one month until March 7, 1991, and constituted the only time when there was a legal restriction on

¹Ammunition-related articles cover categories III, IV, V, and XIV of the U.S. Munitions List.

- all exports of defense articles to Jordan. A ban remained on deliveries of ammunition-related articles through October 17, 1991.
- DSAA officials learned of State's February 6, 1991, suspension via telephone communications. The State Department did not provide written instructions to DSAA, and this caused delays and confusion as to the full scope and intent of the suspension. DSAA notified the military departments by telephone, but it did not provide written instructions until March 4, 1991. Therefore, the State Department's suspension was only formally implemented by DSAA for 3 days before it was partially rescinded on March 7, 1991.
- The military depots continued to deliver defense articles to Jordan's freight forwarder² between February 6, 1991, and March 7, 1991, while the State Department's suspension was in effect. DOD delivered nearly 700 line items worth over \$550,000, consisting primarily of spare parts for the F-5 and C-130 aircraft, Hawk missile support components, Vulcan support components, and support equipment and spares for tanks, howitzers, and vehicles.
- Between August 1990 and August 1991, over 95,000 defense articles, including howitzer projectiles, Hawk repairs, radar sets, and equipment spares, worth over \$11 million were delivered to Jordan's freight forwarder.
- The State Department did notify the U.S. Customs Office in writing of its decision to suspend defense article exports to Jordan, but it failed to notify Jordan's freight forwarder as required by the International Traffic in Arms Regulations (ITAR). Similarly, the freight forwarder was not informed of remaining restrictions on ammunition-related articles once the suspension was lifted. Nevertheless, both the freight forwarder and Customs told us that no defense articles were sent to Jordan between February 6 and March 7, 1991. However, ammunition-related articles, which were still restricted through October 17, 1991, were sent to Jordan.
- The State Department was not legally required to notify Congress of its
 actions to suspend military assistance to Jordan. In response to your
 inquiries about this matter, however, State Department officials
 inaccurately described the timing and scope of their actions to halt military
 assistance to Jordan.

²The freight forwarder, Jordan's agent, ensures that the cargo being sent from the United States to Jordan is covered by export licenses and other written approvals and arranges for transportation of cargo from the United States to Jordan.

State Department Actions to Halt Deliveries Were Poorly Implemented

According to State Department officials, administration officials disagreed among themselves about providing security assistance to Jordan during the Persian Gulf Crisis. State Department officials believed that continuing assistance to Jordan was important because of its support of peace negotiations in the Middle East. However, when Jordan failed to fully support the U.N. sanctions and reportedly shipped defense articles to Iraq during the war, the transfer of defense articles and services under foreign military assistance programs became a policy issue. Thus, there were competing policy objectives to be attained—reprimanding the Jordanian leadership but continuing to maintain economic and military stability in Jordan.

Delays in Suspending New LOAs

State Department records state, and members of Congress understood, that as of August 2, 1990, the Department placed a hold on the approval of new letters of offer and acceptance for defense articles and services under the FMs program for Jordan. However, between August 2 and October 4, 1990, the Department approved 12 new LOAs for training, clothing and textiles, repair and return of nonstandard commercial equipment, automotive support and equipment spare parts, spare parts and components for weapon systems, repair and return of Tow/Cobra missile system components and technical assistance, repair and return of AH-1S COBRA helicopter components, 105-millimeter cartridges (M395) and publications, another case of clothing and textiles, conversion kits for the M-16 rifle, spare parts for communications equipment and electronics supplies, and repair and return of more AH-1S COBRA helicopter components.

State Department officials stated that a hold was not placed on the approval of new LOAs for Jordan until October 2, 1990, but they could not provide evidence to support this date, nor could they explain why the Department had informed Members of Congress that no new LOAs were approved after August 2, 1990.

State's Short-Term Policies to Suspend Deliveries

After King Hussein of Jordan made a speech on February 6, 1991, in which he denounced the coalition war against Iraq, the Assistant Secretary of State for Politico-Military Affairs notified the Assistant Commissioner of the U.S. Customs Service, by memorandum, that all State Department licenses and other written approvals authorizing the export of defense articles and services were suspended. Although the Assistant Secretary acted on his own authority, he said his decision was subsequently approved

by the administration. According to State Department officials, this decision was not based on reports of military goods being shipped between Jordan and Iraq or on questions of Jordan's compliance with U.N. sanctions against Iraq. (A separate classified supplement to this report addresses these issues in more detail.)

On March 7, 1991, the State Department's Director of the Office of Defense Trade Controls lifted the suspension of exports with the exception of ammunition, launch vehicles, guided missiles, explosives, and toxicological agents. According to a State Department official, the suspension was rescinded because the objective of bringing about a change in the political posture of Jordan's leadership had been accomplished. As evidence, the State Department cited King Hussein's remarks in March 1991 adopting a more conciliatory tone. On October 17, 1991, the State Department notified the U.S. Customs Service that all remaining restrictions on the export of defense articles and services to Jordan were removed.

Failure to Notify Freight Forwarder

According to Jordan's freight forwarder, the State Department did not notify him that export licenses and other written approvals for Jordan had been suspended. Under the International Traffic in Arms Regulations (sec. 126.7(b)), State's Office of Defense Trade Controls (ODTC) is required to notify applicants or licensees of revocations, suspensions, or amendments of licensees and other approvals. ODTC officials stated that they are under no obligation to notify licensees of a suspension of licenses and other written approvals unless the suspension will be in effect for an extended period of time, in which case a Federal Register Notice is published. In this case, the State Department considered the Jordan suspension to be informal, and a notice of suspension was not published. The regulations, however, only address suspensions and do not distinguish between formal and informal suspensions.

Delays in Policy Implementation at DOD

According to State and Defense Department officials, DSAA was notified by telephone within a few days about the February 6, 1991, suspension of exports of defense articles to Jordan. In turn, DSAA orally notified the military departments of the suspension but did not issue a written message until March 4, 1991. The reason for the delay, according to DSAA officials, was that obtaining concurrence from the State Department on the wording of the message was extremely difficult. Therefore, DOD formally

implemented State's suspension policy only 3 days before it was rescinded on March 7, 1991.

Similarly, the State Department informed DSAA by telephone that, as of March 7, 1991, it had rescinded the suspension of exports of defense articles and services to Jordan with the exception of ammunition. By written communication dated March 29, 1991, DSAA informed the military departments of the rescission. The delay, according to DSAA, was due to State's inability to develop a written message. The State Department notified DSAA of its October 17, 1991, decision to lift the restriction on ammunition. DSAA, however, did not formally notify the military departments that the remaining restriction was lifted until December 1991.

However, the State Department's written notification to Customs included other restrictions in addition to ammunition, such as guided missiles, explosives, and toxicological agents.

DOD Continued Deliveries to Freight Forwarder

During the suspension—February 6 to March 7, 1991—DOD delivered to Jordan's freight forwarder almost 700 line items of defense articles. Army deliveries included spare parts for armored personnel carriers, howitzers, tanks, and vehicles; Hawk missile and Vulcan support components; and ammunition with a value of almost \$415,000. The Air Force delivered articles worth over \$135,000, including spare parts for the F-5 and C-130 aircraft and the TSP-43 radar. The Navy and Marine Corps, however, delivered no articles during this time. (See app. II for a more detailed description of articles delivered.) DOD continued to deliver to the freight forwarder articles such as chemical masks, ammunition, and guided missile and launch vehicle components—all of which remained under restriction until October 17, 1991, when the State Department lifted its restriction of ammunition-related articles.

U.S. Customs Suspension Actions Partially Effective

Following receipt of the February 6, 1991, State Department notification, the U.S. Customs Service informed its field inspectors, via electronic mail, on February 8, 1991, that all export licenses and other written approvals for the export of defense articles to Jordan were suspended. However, Customs did not notify the freight forwarder of the license suspension because it said that it was not required to do so.

Since the Customs Service does not maintain lists of clearances or inspections of outbound cargo and its examinations are conducted on an

ad hoc basis, we could not ascertain how many inspections of shipments to Jordan took place during the suspension. Customs did detain 15 shipments destined for Jordan between February 1 and February 7, 1991, 14 of which it released upon State's rescission on March 7, 1991. According to Customs officials, its inspectors did not process any shipments of military equipment to Jordan originating from DOD between February 6 and March 7, 1991. That is, the inspectors' random examinations did not show DOD shipments bound for Jordan.

Customs and the freight forwarder maintain that all defense articles released by DOD to the freight forwarder between February 6 and March 7, 1991 (see app. II), were warehoused until the suspension was lifted. Our review of shipping documents (including airway bills, bills of lading, and export declarations) provided by Jordan's freight forwarder appears to support this claim, but we cannot be sure whether or not we were provided all of the relevant shipping documents. In addition, the documents provided show some date alterations and appear incomplete. The records show, however, that after the initial suspension was lifted, defense articles still under restriction, such as chemical masks and Hawk and Sidewinder missile components were sent to Jordan between March and October 1991, even though the restriction on such articles was not lifted until October 17, 1991.

Pipeline Status—Articles Awaiting Delivery

As of August 1, 1990, the military assistance pipeline³ to Jordan included more than 300,000 defense articles worth over \$4 million. By August 1, 1991, the pipeline had over 450,000 defense articles worth almost \$28 million. Between August 1990 and August 1991 over 95,000 defense articles, including howitzer projectiles, Hawk repairs, radar sets, and equipment spare parts, worth over \$11 million were delivered to Jordan's freight forwarder. (See app. III.) As of July 1992, nearly 180,000 defense articles worth over \$20 million had been procured but were pending delivery. Also, as of July 1992, nearly \$8 million of uncommitted funds from fiscal year 1990 and prior years remained available to Jordan. Funds from fiscal years 1991 and 1992 have not been released pending the outcome of State Department's ongoing review of Jordan's foreign assistance program.

³Pipeline refers to items procured but not yet delivered.

State Inaccurately Informed Congress

The State Department was not legally required to notify Congress of its decisions to suspend or resume defense article exports to Jordan. Nevertheless, in the fall of 1990, State Department officials did brief your Committee. Apparently, there was some confusion regarding the timing and scope of their actions to halt military assistance to Jordan. The briefing recipients understood that all deliveries had stopped as early as August of 1990, when in fact the State Department policy pertained only to approving new LOAs while allowing defense articles already procured to be delivered.

Subsequently, in response to your inquiries on this matter, the State Department did not accurately inform you as to what had transpired. For example, in a letter dated November 8, 1991, the State Department stated that all military assistance was delivered pursuant to Letters of Offer and Acceptance signed prior to August 2, 1990, and included only nonlethal items. However, the State Department signed new letters after that date, and DOD delivered some of the defense articles covered by these letters to Jordan's freight forwarder.

On September 16, 1991, the President issued Presidential Determination Number 91-53 certifying that continued aid to Jordan is in the national interest of the United States. In doing so, the President used the provisions under section 586D of the Iraq Sanctions Act, which forbids the use of appropriated funds to provide assistance to any country that does not comply with U.N. sanctions unless the President certifies it is in the national interest. He also used the provisions under section 502 of the Dire Emergency Act, which prohibits Jordan from receiving fiscal year 1991 appropriated foreign assistance funds unless the President certifies it is in the interest of the Middle East peace process to do so. According to a State Department legal adviser, however, the President was not required to make an official determination of Jordan's compliance or noncompliance with U.N. sanctions. He only had to certify that providing assistance to Jordan was in the U.S. national interest.

Suspension of Military Assistance to Peru Was Systematic and Timely

Unlike the Jordan case, the State Department readily and effectively implemented a decision to suspend foreign assistance after President Fujimori suspended the Peruvian constitution on April 5, 1992. On April 7, 1992, the State Department stopped approving new assistance cases and notified DSAA of its decision in writing. Two days later, through the course of a telephone conversation, State and DSAA officials jointly decided to suspend all assistance to Peru. On April 14, DSAA issued a message to the

military departments notifying them of the suspension. A DSAA official stated that even items already en route to Lima were intercepted. For example, a plane carrying defense articles to Lima was diverted to Panama and its cargo warehoused there. Because Peru receives its defense articles through the Defense Transportation System, State's Office of Defense Trade Controls did not have to notify any licensees. In this case, the Departments of State and Defense worked in concert to terminate assistance quickly and effectively.

Recommendations

The Jordan case illustrates the importance of the Departments of State and Defense having better communications and clearer procedures and guidelines. To minimize the risk of the unauthorized export of defense articles when it is determined that a suspension of deliveries is warranted, we recommend that the Secretary of State require the Office of Defense Trade Controls to immediately notify applicants and licensees, such as freight forwarders, of all license suspensions in accordance with section 126.7 of the International Traffic in Arms Regulations. This step would clarify whether or not a suspension has been placed in effect. We also recommend that the Assistant Secretary of State for Politico-Military Affairs and the Director of DSAA jointly develop procedures for quickly and effectively implementing suspensions of foreign military assistance. Such procedures would prevent delays in implementation of State Department policy.

Scope and Methodology

Our review focused on transfers of defense articles owned by DOD and transferred or sold to Jordan under the Foreign Military Assistance program. We met with officials from the Departments of State, Defense, and Commerce (U.S. Customs Service) in Washington, D.C., and obtained information from Jordan's freight forwarder. We analyzed records of deliveries from each of the services for the period August 1, 1990, and August 1, 1991; reviewed approval documentation for new LOAs between August of 1990 and October of 1991; obtained written confirmation of the U.S. Customs Service's actions to implement the suspension of assistance to Jordan; and examined bills of lading, airway bills, and export declarations.

Appendix I contains a chronology of events between August 2, 1990, and the present. We discussed the information contained in this letter with officials at the Departments of Defense and State and the U.S. Customs Service but, at your request, did not obtain written agency comments. We

conducted our review in accordance with generally accepted government auditing standards between April and September of 1992.

As arranged with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days after its issue date. At that time we will send copies to other interested congressional committees and the Secretaries of Defense and State and the U.S. Customs Service. We will also make copies available to others upon request.

This report was prepared under the direction of Joseph E. Kelley, Director, Security and International Relations Issues, who can be reached on (202) 275-4128 should you or your staff have any questions. Other major contributors are listed in appendix IV.

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Assistant Comptroller General

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Abbreviations

CIA	Central Intelligence Agency
CIA	Central Intelligence Agency
DIA	Defense Intelligence Agency
DOD	Department of Defense
DSAA	Defense Security Assistance Agency
FMF	Foreign Military Financing
FMS	Foreign Military Sales
GAO	General Accounting Office
ITAR	International Traffic in Arms Regulations
LOA	Letter of Offer and Acceptance
ODTC	Office of Defense Trade Controls
U.N.	United Nations

Chronology of Events (August 1, 1990, to Present)

August 2, 1990

Iraq invades Kuwait.

State Department places a hold on new LOAs for procurement of defense articles, using foreign military financing (FMF) monies, for Jordan. Previously approved LOAs in process are allowed to proceed.

January 16, 1991

The air war against Iraq begins.

February 6, 1991

King Hussein of Jordan makes a speech denouncing the coalition war against Iraq.

Assistant Secretary of State for Politico-Military Affairs Richard Clarke notifies the U.S. Customs Service, via memorandum, of the suspension of all licenses and other written approvals authorizing the export to Jordan of defense articles and services.

February 28, 1991

Allied forces suspend offensive operations, and Iraq accepts the U.N. resolutions dealing with the invasion of Kuwait.

March 1, 1991

King Hussein of Jordan makes a conciliatory speech calling for peace in the Middle East.

March 4, 1991

DSAA issues a message to all military departments suspending shipment of all U.S. military assistance to Jordan.

March 7, 1991

State's Office of Defense Trade Controls informs the U.S. Customs Service, by memorandum, that defense articles and services, except for ammunition, may be shipped to Jordan.

Appendix I Chronology of Events (August 1, 1990, to Present)

March 11, 1991

State's Office of Defense Trade Controls informs the U.S. Customs Service, by memorandum, that ammunition is defined as categories III, IV, V, and XIV of the U.S. Munitions List.

March 29, 1991

DSAA informs the military departments by message that defense articles and services, other than ammunition, may be shipped to Jordan.

April 10, 1991

Supplemental legislation to cover war costs includes prohibition of the obligation or expenditure of Jordan's fiscal year 1991 funds. The legislation contains a waiver under which the President may allow the funds to be spent if Jordan is taking steps to advance the peace process in the Middle East.

September 16, 1991

Presidential Determination 91-53 provides the waiver. This determination also exempts Jordan from the provisions of section 586D, Public Law 101-513.

October 17, 1991

The State Department lifts the restrictions on the delivery of defense articles to Jordan.

December 1991

DSAA sends a message to the military departments informing them that ammunition and other lethal equipment may be released for shipment.

December 1991 to present

The State Department has not released Jordan's fiscal year 1991 foreign military assistance funds. Fiscal year 1992 funds have been allocated but not apportioned. The funds will be released pending State's review of Jordan's foreign assistance program.

Deliveries of Defense Articles to Jordan's Freight Forwarder (Feb. 6 Through Mar. 7, 1991)

Type of equipment	Value
Spare parts and support equipment, including automotive support and spares (armored personnel carriers, tanks, howitzers, vehicles, and trucks)	\$223,528
Tank spare parts and engine upgrades	2,603
Spares and support components for the Cobra system (Cobra/TOW airborne spares, vehicle spares, Cobra/TOW support components and modification kits)	36,956
Vehicle spares, support equipment, and parts to rebuild M36 trucks	8,321
HAWK support components, missile minder-missile battery subsystem, upgrade to air defense system, repair and return of HAWK, and MQM-107A repair parts	66,100
AH-1 helicopter spares and support equipment	1,955
AN/TPQ-36 and AN/TPQ-37 radar spares and components	104
Vulcan missile system support components	67,622
Technical publications in support of U.S. systems	2,116
Ammunition (charge propellants and fuzes)	388
Parachutes and related equipment	4,150
Total	\$413,843

Note: The date of delivery is an Army estimate because the actual delivery dates could not be provided.

Table II.2 Air Force Deliveries

Type of Equipment	Value
C-130 and F-5 aircraft equipment and TSP-43 radar equipment	\$3,033
C-130 and F-5 aircraft spares, weapons spares, and modification kits	122,789
Automotive (vehicle) equipment	3,463
TSP-43 radar spares	2,281
Nonstandard spare parts	5,049
Total	\$136,615

Note: The date of delivery is an Air Force estimate because the actual delivery dates could not be provided.

Deliveries of Defense Articles to Jordan's Freight Forwarder (Aug. 1, 1990, Through Aug. 1, 1991)

Table III.1: Army Deliveries

Town of anythment	Malaa
Type of equipment	Value
Spare parts and support equipment, including automotive and armament spares (armored personnel carriers,	
howitzers, recovery vehicles, tanks, support vehicles, etc.)	\$2,484,764
Support for Vulcan missile system (automotive, armament,	
and air defense; spares and components for tank vehicles)	276,024
Tank spare parts and engine upgrades	270,538
Spares and support components for the Cobra system	
(airborne Cobra/TOW, repair and return of Cobra avionics, vehicles spares/repairs, and return of Cobra system	593.996
Vehicle spares, support equipment, and parts to rebuild	
M36 trucks	729,119
Spares for communication equipment (e.g., telephones,	, -2,
etc.)	7,071
Ammunition (projectiles, fuzes, charge propellants,	
grenades, hand rifles, cartridge grenade rifles, practice and	101.000
blank cartridges)	121,988
HAWK support components for missile system, missile battery subsystem upgrade, repair and return, safety arming	
device, upgrade to air defense system, and MQM-107A	
repairs and parts	3,038,211
AH-IS helicopters (Cobra/TOW) and helicopter spare and	
support components	343,305
AN/TPQ-36 and AN/TPQ-37 radars, support components, spare parts, installation kits, and manuals	111,798
Clinical equipment	5.243
Technical publications and manuals in support of U.S.	. 5,240
systems, including the Cobra and Hawk systems	2,947
AN/TSQ-73 radar missile minder	1,117
Fuel sampling supplies	4
M40 protective masks	20,809
Chemical equipment, including chemical agent alarm	4,904
Clothing (e.g., uniforms, equipment, etc.)	448,898
Parachutes and related equipment	39,984
Total	\$8,500,720

Note: The date of delivery is an Army estimate because no actual delivery dates could be provided.

Appendix III Deliveries of Defense Articles to Jordan's Freight Forwarder (Aug. 1, 1990, Through Aug. 1, 1991)

Table III.2: Air Force Deliveries

Type of Equipment	Value
Inert training components	\$112
Aircraft ejector seat explosives and support	84,626
C-130, F-5 aircraft equipment and TPS-43 radar equipment	51,129
C-130 and F-5 aircraft spares, weapons spares, and modification kits	2,257,772
TPS-43 radar spares	51,469
Automotive (vehicle) equipment	93,104
Nonstandard spares	61,794
Total	\$2,600,006

Note: The date of delivery is an Air Force Estimate because the actual dates could not be provided.

Table III.3: Navy/Marine Deliveries

Type of equipment	Value
Component parts for AN/TPS-63 radar	\$81,390

Note: According to Navy sources, the date of delivery is actual.

Major Contributors to This Report

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