

Public Comment Analysis

Date: March 17, 2014

Topic: The Proposed Temporary Re-siting and Co-Location of a Portion of P.S. 11 Kathryn Phelan (30Q011) with P.S. 171 Peter G. Van Alst (30Q171) in Building Q171 for the 2014-2015 School Year, and the Proposed Temporary Re-siting and Co-location of a Portion of P.S. 11 Kathryn Phelan (30Q011) with 30QTBD in New Building Q339 for the 2015-2016 and 2016-2017 School Years

Date of Panel Vote: March 18, 2014

Summary of Proposal

On December 6, 2014, the New York City Department of Education (“DOE”) proposed to temporarily re-site and co-locate a portion of the kindergarten and first grade or alternatively the kindergarten of P.S. 11 Kathryn Phelan (30Q011, “P.S. 11”), an existing elementary school, with P.S. 171 Peter G. Van Alst (30Q171, “P.S. 171”), an existing elementary school in building Q171 (“Q171”), located at 14-14 29th Avenue, Queens, NY 11102, in Community School District 30 (“District 30”) for the 2014-2015 school year. In addition, City Year, a community based organization (“CBO”), is located in Q171. For the 2015-2016 and the 2016-2017 school years, the DOE is proposing to temporarily re-site and co-locate a portion of the kindergarten and first grade or alternatively the kindergarten of P.S. 11 with 30QTBD (“30QTBD”), a new elementary school that is anticipated to open in new building Q339 (“Q339”) located at 39-07 57th Street, Queens, NY 11377 in District 30. A “re-siting” means students will attend classes in a different building than the one students have attended in previous years, and a “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, libraries, and cafeterias.

P.S. 11 is a zoned elementary school that currently serves students in kindergarten through sixth grades in main building Q011 (“Q011”), mini-building Q810 (“Q810”), and its adjacent transportable classroom units (Q932, “TCUs”), located at 54-25 Skillman Avenue, Queens, NY 11377, in District 30. In the Spring of 2013, the School Construction Authority (“SCA”) approved the removal of P.S. 11’s mini-building following the 2013-2014 school year in conjunction with the construction of a permanent addition with the capacity of 856 seats, including 202 seats to replace the current mini-building and 654 new additional seats for the school. The construction of the addition is anticipated to take three years, during which P.S. 11 will need additional capacity to accommodate its students.

Therefore, if this proposal is approved, a portion of the kindergarten and first grade will be re-sited to the Q171 building for the first year of construction. Alternatively, if P.S. 11’s kindergarten enrollment in 2014-2015 school year is sufficient to fill all of the available seats in the annex in Q171, P.S. 11 leadership may decide to site its entire kindergarten in Q171 and continue to serve all of its first-grade students in building Q011. Building Q171 is approximately 2.5 miles from building Q011.

If this proposal is approved, for the subsequent two years of construction, P.S. 11's kindergarten and first grade at Q171 would be re-sited to the new Q339 building. Alternatively, if P.S. 11's kindergarten enrollment in the 2015-2016 and 2016-2017 school years is sufficient to fill all of the available seats in the annex in Q339, P.S. 11 leadership may decide to site its entire kindergarten in Q339 and continue to serve all of its first grade students in building Q011. Building Q339 is approximately 0.3 miles from building Q011. P.S. 11 will not need space in Q171 or Q339 after the completion of building Q011's addition.

P.S. 171 is a zoned elementary school that serves students in kindergarten through fifth grade and offers a pre-kindergarten program in building Q171. 30QTBD will be a new elementary school that is anticipated to open in building Q339 and will phase-in one grade per year to serve students in kindergarten through fifth grade at full-scale.

If this proposal is approved, a portion of P.S. 11's students will be co-located with P.S. 171 in building Q171 for the 2014-2015 school year. Building Q171 will serve approximately 230-270 P.S. 11 students in 2014-2015. In the 2015-2016 and 2016-2017 school years, P.S. 11 will serve 230-270 students in building Q339. P.S. 11 will continue to serve a portion of its kindergarten and first grades, and its second- through sixth-grade students in Q011 during this period, or, alternatively, its first- through sixth-grade students, in Q011 during this period if P.S. 11's leadership decides to site its entire kindergarten in Q171 and Q339. In the 2017-2018 school year, P.S. 11 students who are re-sited will relocate to main building Q011 or the new permanent addition to building Q011 scheduled to be completed by September 2017, where P.S. 11 will serve all of its students thereafter.

For the purposes of the proposal, the DOE projected that 230-270 P.S. 11 kindergarten and/or first-grade students will be re-sited to building Q171 for school year 2014-2015 and to Q339 for the 2015-2016 and 2016-2017 school years. The leadership of P.S. 11 will decide which students will be served at Q171 and Q339 during the period of re-siting and may ultimately decide to change the configuration of its grade levels across its sites.

Where possible, the DOE aims to utilize available space in other local school buildings to alleviate overcrowding or serve students during a temporary period of construction. According to the 2012 – 2013 Enrollment, Capacity, Utilization Report (the "Blue Book"), Q171 has the capacity to serve 854 students. The DOE determined that building Q171 would be under-utilized during the 2014-2015 school year. In 2013-2014, the building serves approximately 581 students, yielding a utilization rate of 68%, indicating that the building is "under-utilized" and has the capacity to accommodate additional students. If this proposal is approved, in 2014-2015, P.S. 11 and P.S. 171 will serve a total of 790-890 students in building Q171, yielding a building utilization rate of 93%-104%. Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation.

Additionally, if this proposal is approved, in school years 2015-2016 and 2016-2017, P.S. 11 and 30QTBD will be co-located in building Q339. According to the Program of Requirements ("POR") from the SCA, Q339 has the capacity to serve 472 students. In 2015-2016, the DOE anticipates that the new school will serve approximately 80-90 kindergarten students, which would yield a utilization rate of 17%-19% if this co-location proposal were not approved. This indicates that the building will be "under-utilized" and would have the capacity to accommodate additional students as the new school grows to

scale. If this proposal is approved, in 2015-2016, P.S. 11 and 30QTBD will serve a total of 310-360 students in building Q339, yielding a building utilization rate of 66%-76%. In 2016-2017, P.S. 11 and 30QTBD will serve a total of 390-450 students in building Q339, yielding a building utilization rate of 83%-95%.

This proposal is contingent on the completion of the P.S. 11 addition by September 2017. As noted, currently, the DOE plans for P.S. 11 to serve all of its students in main building Q011 and the new permanent addition adjacent to building Q011 after the 2016-2017 school year. If P.S. 11's addition is not ready at that time, the DOE would issue a separate EIS describing an alternate siting plan for P.S. 11's students.

The details of this proposal have been released in an Educational Impact Statement ("EIS"), which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/SchoolProposalsMar18PEP>.

Copies of the EIS are also available in the main offices of P.S. 11 and P.S. 171.

Summary of Comments Received

Two joint public hearings regarding the proposal were held. The first joint public hearing was held at P.S. 11 on January 7, 2014. At the hearing, interested parties had the opportunity to provide input on the proposal. Approximately 50 members of the public attended the hearing and 13 people spoke. Present at the meeting were District 30 Superintendent Dr. Philip Composto; Anna Efkarpidis, Principal of P.S. 11; Anne Bussel, Principal of P.S. 171; P.S. 11 School Leadership Team ("SLT") representatives Assistant Principal Pieranna Lombardi, Allison Kelly, Elba Santiago, and Tenille Astor; Nick Gulotta and Matthew Wallace representing Council Member Jimmy Van Bramer; Vijay Chadhuri representing Congressman Joseph Crowley; and Emily Ades from the Office of Portfolio Management. District 30 Community Education Council ("CEC 30") confirmed attendance but due to circumstances beyond their control, a representative was ultimately unable to attend. The second joint public hearing was held at P.S. 171 on January 9, 2014. At the hearing, interested parties had the opportunity to provide input on the proposal. Approximately one member of the public attended the hearing and there were no speakers. Present at the meeting were District 30 Superintendent Dr. Philip Composto; CEC 30 representative Jeffrey Guyton; Anna Efkarpidis, Principal of P.S. 11; Anne Bussel, Principal of P.S. 171; P.S. 171 School Leadership Team ("SLT") representatives Francine Ferrari, Carmen Montalvo, and Olga Silva; and Emily Ades from the Office of Portfolio Management.

The following comments and remarks were made at the joint public hearings on January 7, 2014 and January 9, 2014:

1. Matthew Wallace representing Council Member Jimmy Van Bramer expressed support for the construction of the P.S. 11 addition and said that he was in attendance to listen to the concerns about the distance students from P.S. 11 will travel to go to Q171.
2. Jeffrey Guyton representing CEC 30 said that parents are concerned about the distance that students will travel to the annex at Q171.
 - a. He requested that the DOE consider the new building Q313 since it is in closer proximity to P.S. 11.
3. Anne Bussel, Principal of P.S. 171, expressed that she will happily welcome P.S. 11 staff and students.

4. Francine Ferrari representing the P.S. 171 SLT expressed support for the proposal and said that the P.S. 171 community is looking forward to welcoming the students of P.S. 11.
5. Elba Santiago, representing the P.S. 11 SLT, stated that the SLT is in favor of the proposal due to severe overcrowding and the immediate need for new capacity. She expressed that construction on P.S. 11 should not be delayed.
6. David Rosasco, representing The Woodside Neighborhood Association, inquired about the logistics of school start and end times.
7. Multiple commenters expressed general opposition to the co-location.
 - a. Multiple commenters expressed concerns about students being bused 2.8 miles from the school and that the DOE should identify a closer site such as Q313.
 - b. Multiple commenters requested that construction be delayed for a year until Q339 construction is completed.
8. One commenter suggested that the School Construction Authority (“SCA”) negotiate with the Parks Department in order to build an addition in the adjacent park so that the school’s mini-building will not be removed.
9. One commenter expressed opposition to the proposal based on the plan to program classes with over 40 students in a classroom.
10. One commenter requested that the DOE listen to the concerns and opinions of parents and expressed that this was a last minute decision without community input.
11. One commenter expressed concerns that children may have to attend school in multiple locations during the early childhood years of school.

A community meeting regarding this proposal was held at the Q011 building on March 13, 2014:

At that meeting, interested parties had another opportunity to provide input on and ask questions about the original proposal. Approximately 65 members of the public attended the meeting. Present at the meeting were CEC 30 Co-President Isaac Carmignani and CEC 30 member Valarie Lamour; Principal of P.S. 11 Anna Efkarpidis; P.S. 11 SLT representatives Tenille Astor, Allison Kelly, Pieranna Lombardi, Kaitlyn Vidafar, Michelle Lederman, and Elba Santiago; the District 30 Superintendent Dr. Philip Composto; representatives of State Senator Michael Gianaris, Congressman Joseph Crowley, Assembly Member Catherine Nolan, Assembly Member Margaret Markey, and Council Member Jimmy Van Bramer; and the DOE’s Deputy Chancellor Kathleen Grimm and Senior Superintendent Laura Feijoo, Alexandra Robinson and Robert Carney from the DOE’s Office of Pupil Transportation, Jim Dekeles from the DOE’s Office of Space Planning, Paola de Kock from the DOE’s Office of Family and Community Engagement, Mary Leas and Joe Scalisi from the School Construction Authority, Helen Tsang from the DOE’s Office of Public Affairs, and Harry Hartfield from the DOE’s Press Office. Additionally, a walkthrough of the Q011 building was conducted by Senior Superintendent Laura Feijoo from the DOE before the community meeting on March 10, 2014. Another walkthrough of the Q171 building was conducted by Deputy Chancellor Kathleen Grimm from the DOE on March 12, 2014.

The following comments were made at the community meeting on March 13, 2014 on the proposal:

12. Katie Jedrlinic representing Assembly Member Catherine Nolan expressed concerns about the proposal to temporarily re-site P.S. 11’s students at Q171 for one year:
 - a. She expressed concerns about busing students almost 3 miles away to Q171.

- b. She urged the DOE to come up with an alternate solution, such as using space at Q313 or St. Teresa's, or leasing other spaces around the community.
 - c. She expressed support for the construction of an addition to alleviate overcrowding at P.S. 11.
13. Vijay Chadhuri representing Congressman Joseph Crowley expressed the following about the proposal to temporarily re-site P.S. 11's students at Q171 for one year:
 - a. He stated that parents and community members oppose the proposal.
 - b. He expressed concerns about busing students almost 3 miles away to Astoria.
 - c. He expressed support for construction to alleviate overcrowding.
14. Carolina Gil representing Assembly Member Margaret Markey asked that the DOE find space closer to P.S. 11.
15. Jacob Tugendrajach representing State Senator Michael Gianaris stated that it cannot be the best option to send students 3 miles away from P.S. 11, and that this is a burden on parents.
16. Matthew Wallace representing Council Member Jimmy Van Bramer expressed the following:
 - a. He is pleased about construction of an addition for P.S. 11.
 - b. He is concerned about busing students to Astoria.
 - c. He urged the DOE to consider Q313 or elsewhere.
17. CEC 30 Representative Valarie Lamour stated that the CEC is not united in supporting the proposed temporary co-location of P.S. 11 at Q171 and expressed the following concerns:
 - a. She expressed concern that incoming kindergarten families are not aware of this proposal.
 - b. She expressed concern about busing students to Astoria.
 - c. She proposed that P.S. 11's 6th grade be temporarily re-sited to Q404.
18. CEC 30 Co-President Isaac Carmignani stated that the CEC is in favor of the proposal because there is not a better solution.
19. A representative of Class Size Matters expressed concern that P.S. 11's large class sizes in 11 rooms violate building codes.
20. Multiple commenters expressed the following concerns about the proposal:
 - a. Multiple commenters expressed concerns about students being bused 2.8 miles from the school and stated that the DOE should identify a closer site.
 - b. Multiple commenters expressed concern about the plan to program classes with over 40 students in a classroom.
 - c. Multiple commenters requested that construction be delayed for a year until Q339 construction is completed.
21. Multiple commenters expressed concern that the meeting was not advertised to families of incoming kindergarten students.
22. Multiple commenters asked that the DOE alert parents who applied to P.S. 11 about the proposal.

Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE

23. State Senator Michael Gianaris, Congressman Joseph Crowley, and Assembly Members Catherine Nolan and Margaret Markey submitted a letter expressing the following comments on the proposal:
 - a. They expressed support for the addition of P.S. 11 to alleviate overcrowding.

- b. They expressed concern about busing P.S. 11's kindergarten students almost 3 miles away to Astoria, stating that this temporary location is too far and will create hardship for parents.
 - c. They expressed concern about the psychological effects on students attending school in three different locations over three years.
 - d. They urged the DOE to find a closer alternative for a temporary co-location, and asked that the DOE consider locations in District 24.
24. Council Member Jimmy Van Bramer submitted a letter expressing the following comments on the proposal:
- a. He expressed support for construction to alleviate severe overcrowding.
 - b. He expressed concern about the need to commute to Q171.
 - c. He asked that the DOE consider closer options such as Q313 for temporary co-location of P.S. 11 students.
25. Multiple commenters made alternate suggestions to the proposal. These included:
- a. Delaying construction for a year so that Q339 could be used as an annex when that building is completed.
 - b. Considering using new building Q313 in District 24 as an annex since it is closer than Q171.
26. Multiple commenters expressed opposition to programming classes with over 40 students and stated that P.S. 11 will be in violation of the NYC Building Code which requires that students in grades 1-12 have 20 square feet per child.
27. One commenter expressed concerns that translation materials were not provided to the school.
28. One commenter expressed concerns that younger children are being bused, and asked why P.S. 11's older grades are not moving to Q171.
29. CEC 30 member Deborah Alexander sent a message requesting that, if this proposal is approved, families who applied to P.S. 11 through Kindergarten Connect be informed that their children will not be in the building for the next two years, and that the DOE gives them an opportunity to apply elsewhere.

Analysis of Issues Raised, Significant Alternatives Proposed and Changes Made to the Proposal

Comments 1, 2, 7(a), 12(a), 13(b), 15, 16(b), 17(b), 20(a), 23(b), and 24(b) express opposition to the proposed temporary re-siting to Q171 due to concerns about busing students 2.8 miles from P.S. 11; comment 28 concerns the busing of kindergarteners to Q171.

As mentioned below, consideration was given to all available options within a 5-mile radius of P.S. 11. Careful concern was used to determine a building that could accommodate students from P.S. 11 during the removal of the mini-building and construction of the addition. The addition will ultimately allow for permanent instructional space for P.S. 11.

The proposed re-siting and temporary co-location of a portion of P.S. 11's students is intended to provide additional space for P.S. 11 so it can continue serving its current students as well as continue to admit new students during construction of its addition. This proposal will allow for a portion of P.S. 11's students to be temporarily served in buildings that have excess space while an addition is being constructed to accommodate the loss of mini-building capacity, and will provide additional elementary capacity in the district.

Where possible, the DOE aims to utilize available space in other local school buildings to serve students during a temporary period of construction. The DOE determined that building Q171 would be “under-utilized” during the 2014-2015 school year with a utilization rate of 68%, indicating that the building has the capacity to accommodate additional students.

Once students are enrolled in P.S. 11 for the 2014-2015 school year, the Office of Pupil Transportation will work with P.S. 11 to determine and address the need for busing or shuttle service to the annex at Q171. All students traveling to Q171 will be provided with transportation according to Chancellor’s Regulation A-801.

During the joint public hearing and March 13 community meeting at P.S. 11, Superintendent Composto responded that the P.S. 11 administration and the Office of Pupil Transportation will work with families if there are any concerns.

In regards to comment 28, the principal of P.S. 11 has flexibility in determining what grades will be annexed. As mentioned during the March 13 community meeting, the principal in consultation with the SLT and community Superintendent determined that annexing kindergarten and possibly a portion of first grade would be the best plan.

Comments 2(a), 12(b), 14, 16(c), 23(d), 24(c), and 25(b) suggest that the DOE consider using closer buildings such as new building Q313 in District 24 instead of Q171; comment 17(c) suggests that the DOE consider using building Q404 for P.S. 11’s sixth grade.

Consideration was given to all available options within a 5-mile radius of P.S. 11. The DOE has worked with the Superintendent, the SLT, and Principals of the impacted schools to ensure that all parties were in agreement with the plan to house the temporary annex in Q171 and subsequently Q339.

In reference to the suggestion to use space in Q313, a new building that will open in District 24 for the 2014-15 school year, the DOE has considered this as one of the many available options. The under-utilized space at Q313 will likely be used to provide temporary swing space for another school in District 24 during a construction project as proposed in an EIS on February 28, 2014, which can be found on the DOE Web site: www.schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/SchoolProposalsMay62014PEP.

Comment 6 referred to the times that students would attend school at the annex site.

As is the practice with all co-located school organizations in the city, the building council—including the principals of P.S. 11 and P.S. 171 and subsequently the principal of the new school in Q339—will work to coordinate an arrival and dismissal schedule that is mutually beneficial for both schools.

Comments 7(b), 8, 20(c), and 25(a) suggested alternate plans for construction at P.S. 11 including delaying construction for one year and building on The Parks Department land.

The DOE received overwhelming community support for this construction project due to the substantial and immediate need for additional capacity in this area.

Further, Doughboy Park, which adjoins P.S. 11, is dedicated parkland. The New York City Department of Parks and Recreation has confirmed that Doughboy Park cannot be used for non-park purposes without the authorization of the New York State Legislature and the identification and provision of replacement parkland nearby, which is a process that can take years and would delay the delivery of the seats needed to relieve local overcrowding.

Comments 9, 19, 20(b), and 26 expressed opposition to the proposal due to P.S. 11 programming with more than 40 students in a classroom and concerns that this violates building codes.

One of the ways that the school administration, with full support of the superintendent and SLT, has chosen to program is by creating “Team-teaching classes.” These classrooms have up to 45 students with 2 teachers, which affords a smaller pupil: teacher ratio as well as a model that has had proven success in the school.

In terms of the NYC Building Code, it requires a minimum “egress capacity” per floor in order to ensure “safe exit” of the entire “occupant load” of each floor level, off of the floor and out of the building in the event of an emergency.

The Code dictates how to calculate that occupant load for different types of buildings. For schools, the calculation is based on counting one child for every 20 square feet of classroom space, and adding to that the occupant load for other occupied spaces on that floor. Ultimately the calculation determines a total number of occupants per floor. The egress capacity, the number of occupants that can safely exit that floor via the stairs, is set by this number. In the case of building Q011, the egress capacity of the stairs on each floor is in excess of the occupant load.

The safety of our students and staff is of the utmost importance, and pursuant to Chancellor’s Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

The DOE is committed to addressing District 30 capacity issues; the need for temporary relocations and similar measures are in the service of building more capacity for the long-term.

Comments 10 and 13(a) concern community input on this proposal.

The DOE met with stakeholders, including the Superintendent and leadership of both impacted schools, to collectively evaluate several options for annex space. Stakeholders unanimously agreed to utilize space at Q171 for one year and then re-site the annex to new building Q339 for the remaining two years of construction.

The DOE appreciates all feedback from the community regarding a proposal. When the EIS was issued, it was made available to the staff, faculty and parents at P.S. 11 and P.S. 171, on the DOE’s Web site, and in each school’s respective main office. In addition, the DOE dedicates a proposal-specific Web site and

voicemail to collect feedback on this proposal. Furthermore, all schools' staff, faculty and parent communities were invited to an Information Session on December 9, 2013 at P.S. 11 as well as to the Joint Public Hearings on January 7, 2014 and January 9, 2014 to solicit further feedback. Additionally, on March 10, 2014 and March 12, 2014 DOE representatives including a member of the senior leadership team visited P.S. 11 and P.S. 171 and met with the schools' administration and SLT to discuss the proposal, and on March 13, 2014, the DOE held a community meeting to answer questions and provide more information to the families. All feedback will be taken into consideration prior to the Panel for Educational Policy ("PEP") panel meeting. In addition, each school's staff, faculty, and parent communities can make comments at the March 18, 2014 PEP meeting before the PEP votes on the proposal.

Comments 11 and 23(c) expresses concerns that students will attend school in multiple locations for the early childhood years of school.

The DOE met with stakeholders, including the Superintendent and leadership of both impacted schools, to collectively evaluate several options for annex space. Stakeholders unanimously agreed to utilize space at Q171 for one year and then re-site the annex to new building Q339 for the remaining two years of construction.

The DOE anticipates that the leadership of P.S. 11 will continue, as they have always done, to provide a thoughtful, developmentally appropriate transition plan for children and families as they move from one grade to the next. This will hold true for students served in annexes as well as in the main building. The DOE expects that the staff across all sites of P.S. 11 will continue to work collaboratively in order to create a supportive learning environment for all students served in the school.

Comment 27 stated that translated materials were not provided to the school.

According to the language needs submitted by P.S. 11, approximately 32% of students speak Spanish and 11% speak Bengali while the remainder speaks English or another language with a need less than 3% of the student population. Consistent with the 10% needs threshold outlined in Chancellor's Regulation A-663, the DOE provides written translated materials for language needs impacting 10% or more of the student population. All translated materials were provided to the school during the week of December 16, 2013 in advance of the Joint Public Hearings on January 7, 2014 and January 9, 2014.

Comments 17(a), 21, 22, and 29 request that incoming families to P.S. 11 be informed of community meetings and of the proposal to temporarily re-site P.S. 11's students to Q171.

As mentioned during the March 13 community meeting, the SLT of P.S. 11 sent flyers to community organizations and directors of pre-kindergarten programs to alert incoming families of the proposal and community meeting. Additionally, the school posted flyers in the hallway advertising the community meeting on March 13.

If this proposal is approved, the DOE will ensure families receiving kindergarten offers to attend P.S. 11 are provided with information about the plan.

Comments 3, 4, 5, and 18 express support for the proposal and do not require response.



Comments 12(c), 13(c), 16(a), 23(a), and 24(a) express support for the construction of an addition to P.S. 11 and do not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.