

ORIGINAL

Decision No. 79451

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Investigation)
into the rates, rules, regulations,)
charges, allowances and practices)
of all common carriers and highway)
carriers relating to the transpor-)
tation of any and all commodities)
between and within all points and)
places in the State of California)
(including, but not limited to,)
transportation for which rates are)
provided in Minimum Rate Tariff)
No. 15).

Case No. 7783
Petition for Modification No. 41
(Filed April 30, 1971;
Amended September 27, 1971)

(Appearances are shown in Appendix A)

O P I N I O N

Minimum Rate Tariff 15 (MRT 15) contains yearly, monthly, weekly and hourly vehicle unit rates for the transportation of general commodities. Hourly vehicle unit rates apply only within the Metropolitan Los Angeles Area. Said hourly rates were established in MRT 15 pursuant to Decisions Nos. 78264 through 78271, dated February 2, 1971, in Case No. 6322, Order Setting Hearing in Decision No. 74991. Hourly rates in Minimum Rate Tariff 5 (MRT 5) applicable to transportation in Los Angeles and Orange Counties were cancelled concurrently with the establishment of hourly rates in MRT 15, pursuant to Decision No. 78266 in the same proceeding.

The hourly rates in MRT 5 were unrestricted as to the type of highway carriers' equipment which could be furnished. Said hourly rates applied to freight, regardless of classification, and were based on the greatest (heaviest) gross weight of the property transported by the unit of carriers' equipment at one time during a single

transaction. Said hourly rates were determined on the total of the loading, unloading and driving time computed from the arrival of carrier's equipment at point of origin to the completion of unloading at point of destination.

Hourly rates in MRT 15 are based on the specific type of equipment unit furnished.^{1/} Said rates apply from the time the equipment unit departs from the carrier's terminal to its return thereto ("portal-to-portal" time). The vehicle unit rates in MRT 15, except the hourly rates, are subject to the articles shipped being released to a valuation not in excess of fifty cents per pound per article. MRT 15 provides rates in cents per mile to be added to the monthly, weekly, and hourly vehicle unit rates.

California Trucking Association (CTA), petitioner, alleges that major changes in format, classification and application of hourly rates resulted from the provisions of MRT 15 established pursuant to Decision No. 78264; that such changes have created uncertainties and that such changes make it more difficult and expensive for shippers and carriers to determine proper charges. Petitioner asserts that corrective measures appear necessary. Petitioner proposes that the format of hourly rates formerly contained in MRT 5 be re-established and that said hourly rates be adjusted upward to reflect current wages as set forth in collective bargaining agreements between Teamster Union employees and motor carriers. Petitioner also proposes that certain provisions of MRT 15 adopted pursuant to Decisions Nos. 78264 and 78271 be retained, such as construction of hourly rates on a "portal-to-portal" basis.^{2/} CTA also requests that the released valuation of 50 cents per pound be made applicable to the hourly rates in MRT 15.

1/ No vehicle unit rates are provided in MRT 15 for pneumatic-hopper equipment or for end-dump truck equipment.

2/ CTA also proposes that the minimum charge based on four hours (formerly one hour) be retained.

Public hearing was held before Examiner Mallory in Los Angeles on August 9 and 17, and October 5, 1971. The matter was submitted on the latter date. Evidence was presented on behalf of petitioner; Bulk Freightways, a highway permit carrier which operates pneumatic equipment; Bethlehem Steel Company and Shell Chemical Company, protestants; and the Commission staff.

CTA's Assistant Director of its Division of Transportation Economics presented Exhibits 41-1 through 41-9, which contain proposed revisions of MRT 15; reports of the hourly costs of transportation as of July 1, 1971 and of the average hourly costs for the calendar year 1972; costs of forklift services; and comparisons of present and proposed rates.

The witness for CTA stated that the primary purpose of the petition herein is to re-establish the historical format of the hourly rates. The secondary purpose is to return such rates to a compensatory basis by reflecting therein current carrier operating costs. The relief sought in the petition was amended on September 27, 1971, to request that said rates include the average of the Teamster driver wage scales which will be in effect in 1972.^{3/}

The witness stated that the petition herein stems from meetings held by CTA's rate committee with local carriers and shippers shortly after the hourly rates in MRT 15 became effective.^{4/} The witness stated that persons attending such meetings expressed dissatisfaction with the change in format of the hourly rates. According to the witness, this dissatisfaction relates to the following:

^{3/} Said wage rates are scheduled to be increased on January 1 and July 1, 1972, pursuant to current collective bargaining agreements.

^{4/} The hourly rates became effective on April 24, 1971, pursuant to Decision No. 78472, issued March 23, 1971, which denied rehearing or modification of Decisions Nos. 78264 through 78271.

1. Carriers' employees find it difficult to keep track of the mileage involved in hourly rate transactions. In addition to recording time factors, it is necessary to make notation of mileages upon leaving and returning to the carrier's place of business, which carriers' employees assertedly fail to do.

2. The change in format of the hourly rates precludes the use of hourly rates on pneumatic-hopper equipment and end-dump equipment because vehicle unit rates on this type of equipment are not provided in MRT 15.

The witness stated that the mileage portion of the dual-factor hourly rates in MRT 15 is unenforceable for the reason that shippers have no way of determining the accuracy of the mileage computation; therefore, shippers will accept no more than a fixed number of miles per transaction. Assertedly, the mileage computation is an added complication which has no place in the hourly rate structure and partially defeats the purpose of hourly rates. The witness stated that mileage computations are required to be recorded not more often than monthly in connection with yearly and monthly rates or weekly, whereas the mileage computation must be recorded in connection with each transaction for hourly rates. Assertedly, mistakes or omissions are frequent in connection with hourly rates.

The witness stated that hourly rates were intended to provide a simplified rate structure to be applied in situations where a large number of commodities are included in a single shipment and the shipper does not want to classify the articles; numerous stops are to be made and the shipper does not want to rate each stop separately; or expedited service is required by the shipper. The witness categorized the foregoing as a premium type of service for which shippers have been willing to pay freight charges which may exceed charges under the minimum class or commodity rates.

The witness testified that the effect of Decision No. 78271 was to cancel the use of hourly rates on pneumatic-hopper and end-dump equipment. Certain carriers engaged in this transportation have been granted interim or final authority to depart from the minimum class rates by assessing the former level of hourly rates pending the outcome of this proceeding.^{5/}

The CTA witness indicated that persons attending the aforementioned meetings also indicated dissatisfaction with the new format because the rates are based on the type and size of the equipment unit furnished rather than on the maximum weight transported. According to the witness, carriers may not have available the size or type of equipment best suited to the shipper's needs when the request for service under hourly rates is received. Thus, carriers may be required to furnish larger equipment than needed, which the shippers must pay for.

The CTA witness presented cost information in two forms. One method was to bring up-to-date prior hourly cost studies introduced in the proceeding involving MRT 5 (Case No. 5435). This was done by substituting in said studies the labor costs which will be in effect in 1972 pursuant to collective bargaining agreements. The dollar differences in the average costs for 1972 and the costs in effect when MRT 5 hourly rates were last adjusted were determined, and the former MRT 5 hourly rates were increased by said amounts to arrive at petitioner's proposal herein.

^{5/} Bulk Freightways, Decision No. 78630, in Application No. 52546; West Coast Warehouse Co., Decision No. 79285 (permanent authority), in Application No. 52579; Tom Utsuki Trucking, Inc., Decision No. 78799, in Application 52634; Wm. M. Shatto, Inc., Decision No. 78798, in Application No. 52643; Lloyd Hendricks Wood, Decision No. 78876, in Application No. 52686.

Carriers using dump-truck equipment have received authority to haul sodium chloride (salt) at hourly rates, and carriers using pneumatic equipment have been authorized to haul powdered clay or earth (Star Dust), plastic in granules, sodium phosphate and sodium silicate at hourly rates.

A different method of cost determination was made to test the reasonableness of the "offset" method used by petitioner as a basis for its rate proposal. The latter method is a synthesis of current hourly driver labor costs and the most recent costs of van and flatbed equipment available from the information included in the Commission's Data Bank. Indirect expense and gross revenue expense ratios, use-factors of equipment, and average speeds were based on the data as set forth in staff cost studies introduced in the proceeding leading to Decisions Nos. 78264, 78266 and 78271, modified as indicated in Decision No. 78264. No study was conducted by petitioner of actual carrier performance under hourly rates. The latter cost development results in higher costs than the "offset" costs described above. The witness concluded, therefore, that the rates reflecting the "offset" level of hourly costs would not be excessive.

The witness testified that present MRT 15 hourly rates are constructed, in part, on a fixed relationship to the weekly rates in MRT 15. The witness contended that, to such extent, said hourly rates are not related to operating costs developed and as presented by the staff in Case No. 6322. The witness urged that cost-oriented rates are preferable to rates constructed on any other basis.

The CTA witness also presented testimony designed to show that holiday overtime provisions in connection with hourly rates are improperly constructed.

An officer of Bulk Freightways testified in support of reinstatement of hourly rates for pneumatic equipment. The witness stated that Bulk Freightways has used hourly rates for several years in connection with transportation of dry chemicals in bulk in pneumatic-hopper equipment within Los Angeles and Orange Counties; that approximately 30 percent of the carrier's revenue is earned from such transportation; and that there are three other carriers

which earn significant revenues from the transportation of chemicals in pneumatic equipment in the Metropolitan Los Angeles Area. The witness testified that the reason hourly rates are applied is that such rates result in lower charges than under the minimum class rates.^{6/} The witness also testified that initial purchase prices and operating costs are higher for pneumatic equipment than for van and flatbed trucking equipment.

A representative of California Manufacturers Association, in his opening statement, opposed the relief sought for the following reasons: Petition No. 41 seeks additional increases in rates (over those resulting from increased wage costs) by returning to the method of applying rates contained in former MRT 5 and by applying certain restrictive provisions contained in MRT 15.^{7/} The representative indicated that a direct comparison of the former rates in MRT 5 and those initially proposed herein shows that the latter rates are from 13.4 to 19.5 percent higher than the former. He also asserted that petitioner has not justified the retention of the more restrictive MRT 15 rules in connection with levels of rates proposed herein.

Shell Oil Company presented two witnesses who opposed the relief sought herein. The witnesses testified that Shell incurred increased transportation costs as a result of the restructured hourly rates in MRT 15. They asserted that Shell would incur additional increased freight charges if the petition is granted.

^{6/} Bulk Freightways was granted interim authority to assess hourly rates for transportation of salt, plastics, sodium phosphate and sodium silicate for four shippers using pneumatic-hopper equipment. (Decision No. 72630, dated May 4, 1971, in Application No. 52546.)

^{7/} Petition 41 would retain the computation of hours on a "portal-to-portal" basis, and would retain the minimum charge of four hours. The former MRT 5 rates were computed on the time from arrival at first point of origin to completion of unloading at last point of destination. The minimum charge in MRT 5 was for one hour.

They urged that if existing rates are compensatory, as indicated in Decision No. 78271, further increases resulting from the change in format of the rates is not warranted. The witnesses indicated that if further increases in hourly rates are made, Shell would give consideration to the use of proprietary equipment in the Los Angeles Basin Area.

A witness for Bethlehem Steel Corporation testified that said company uses hourly rates extensively for the movement of structural steel from points in Metropolitan Zone 247 to points in Metropolitan Los Angeles Area. The witness indicated that substantial increases in charges would result from the restructured rates in MRT 15 as compared with the former rates in MRT 5. The witness testified that further increases would result from the petition herein. He indicated that part of the increase would result from computation of time on a "portal-to-portal" basis and a part would result from the additional charges for service after 6:00 p.m. and before 7:00 a.m. The witness stated that Bethlehem would have no objection to returning to the former format of rates, if the former method of time computation was reinstated. The witness also testified that if the present method of determining hourly rates is retained, the mileage charge should be rescinded as the method of determining mileages is unreliable.

An associate transportation rate expert testified in opposition to certain aspects of petitioner's proposal and recommended that the present format of hourly rates be retained with a minor modification in the rates for tractor and semitrailer equipment.

The witness testified that the present MRT 15 hourly rates are bottomed on a staff cost study which reflects full carrier liability for loss or damage to goods transported. The witness asserted that if released value provisions are adopted lessening carriers' liability for loss or damage, rates should be reduced to reflect the lower liability. The witness indicated that, in his opinion, there is no cost or other basis in the record on which such a reduction could be made.

The staff witness opposed the rates proposed by petitioner for forklift equipment. Petitioner proposes the following:

<u>Forklift (Capacity)</u>	<u>Charge in Cents Per Hour</u>
4,000 pounds and under	130
4,001 to 8,000 pounds	150
8,001 to 18,000 pounds	270
18,001 pounds and over	330

MRT 15 presently contains charges in Item 460 of \$1.55 per hour for forklift equipment. The staff witness stated that although separate costs were provided in the staff cost study introduced in Case No. 6322 based on the weight breakdowns proposed by CTA herein, the staff investigation indicated that 83 percent of the forklift equipment operated by carriers used in the study had a capacity of 8,000 pounds or less. The witness stated that it is difficult to determine capacities of forklift equipment used; that is, whether capacity should be determined on actual capacity, manufacturer's rated-capacity, or some other basis. It was the conclusion of the witness that to establish separate rates for forklift equipment would introduce a meaningless complication to the application and enforcement of the minimum rates.

The staff witness also opposed the cancellation of hourly rates in Item 459 of MRT 15 which would result from petitioner's proposal. Said hourly rates apply to when the carrier furnishes a tractor and driver for purposes of transporting empty or loaded trailers from or to railroad assembly points. In the event said item is cancelled, the hourly rates for full units of equipment would be applicable. The witness stated that the rates in Item 459 are lower than other rates because they are predicated on the costs for a tractor and driver only. He further stated that the rates in Item 459 are subject to a one-hour minimum charge, whereas the rates which would be applicable on the cancellation of said item are subject to a minimum charge of four hours. The witness testified that the rates in Item 149 were developed at the request of the

California Furniture Manufacturers Association and CMA for the movement of empty and loaded trailers that have prior or subsequent movement in rail trailer-on-flat-car service. The witness urged that such rates be retained.

The staff witness attempted to refute the contention of petitioner's witness that MRT 15 hourly rates are not based on costs but are based on fixed relationships to weekly rates in MRT 15. The witness indicated that prior testimony in Case No. 6322 shows that the hourly rates proposed by the staff in that proceeding initially were related to staff cost data; it was only in the event that the rates so developed fell below 1/40th of the corresponding weekly rate was the rate determined on a fixed relationship to the weekly rate.

The staff witness testified in support of retention of the charge for mileage, as well as hours, in connection with the dual-factor hourly rates in MRT 15. It is his view that rates based on actual mileages traversed are more precise, inasmuch as the costs underlying hourly rates proposed by petitioner reflect mileage costs based on an average of twenty miles per hour regardless of the distance traversed.

The staff witness also opposed the manner in which premium time would be charged for under petitioner's proposal. Petitioner proposes that all time between the hours of 6:00 p.m. and 7:00 a.m. be subject to an additional charge per hour based on driver's overtime rates. The staff witness pointed out that all service performed within said hours is not subject to overtime rates in the collective bargaining agreement; only those hours which are in excess of 8 hours in any one day, or 40 hours per week. The witness urged that existing overtime provisions of MRT 15 more accurately reflect carriers' liability for payment of overtime to their drivers than do the provisions proposed to be adopted by petitioner.

The staff witness also explained the factors underlying the construction of holiday overtime charges applicable in connection with hourly rates. The witness urged that present charges give full effect to carriers' operating costs.

It is the view of the staff witness that hourly rates have a purpose in the minimum rate structure, not solely to provide for a premium service to the shipper, but to cover situations where the shipper desires to control the flow of traffic where multiple-stop pickup or delivery service is to be performed, and in instances where unusually favorable loading and unloading circumstances present an economic advantage for the use of hourly rates.

The record shows that the staff cost study in Case No. 6322 which underlies the hourly rates in MRT 15 was not based on observations of actual hourly rate transactions, but was synthesized from the cost study covering transportation of general commodities under class rates.

Position of the Parties

In its argument, CTA urged that the Commission did not have the evidence and background necessary to support a change in the hourly rate structure from a weight basis to a new method as was done in Decision No. 78264. Assertedly, the staff evidence in this proceeding confirms the foregoing, in that the staff witness conceded that the two-factor system of hourly rates was not founded on the staff cost study introduced in Case No. 6322, but is predicated upon a predetermined relationship to existing vehicle unit rates. CTA also argued that even if costs had been used to the exclusion of other data, the staff cost study in the prior proceeding was deficient in that said cost study was not based on performance factors for the particular services involved.

CTA believes that there is an essential difference between weekly or monthly vehicle unit service, on the one hand, and hourly service, on the other, in that the vehicle used in weekly or monthly service is dedicated to a particular shipper for a fixed period of time, while the vehicle used in hourly-rate service is not so dedicated. When hourly rates are used, CTA argued, the shipper wants the traffic moved expeditiously, and is seldom concerned with the type of equipment furnished. Inasmuch as requests for service may come at any time, the carrier must use equipment on hand, whether or not said equipment is the best suited to the transportation to be performed. CTA argued that such conditions require that hourly rates be stated on a weight basis rather than an equipment basis.

CTA also argued that insufficient data were made available in the Case No. 6322 proceeding on which to properly adjust the hourly rates formerly contained in MRT 5 and that hourly rates should revert to that basis, pending completion of more recent and thorough studies of costs and other factors underlying hourly rates.

The Commission staff argued that the evidence in Case No. 6322 was adequate to support the adjustments made in Decisions Nos. 78264 and 78271, and the changes made in said decisions should not be rescinded. The staff does not believe that CTA has proved the present format is unworkable. Therefore, the staff believes that the present format should be retained, subject to the minor change recommended in its Exhibit 41-10.

CMA stated the Commission had denied rehearing of Decisions Nos. 78264 and 78271; that CTA subsequently filed 12 petitions seeking to amend rates applicable in the Metropolitan Los Angeles Area; and that in Decision No. 78981 the Commission stated that it would not entertain those petitions in which no new evidence would be offered. CMA urged that the petition herein be denied for the foregoing reason.

Statement of Issues

The petition herein presents the following questions:

1. Whether the format of hourly rates should be changed from a dual-factor basis as now contained in MRT 15 to the weight basis formerly contained in MRT 5.
2. If the proposal to revert to a weight basis is adopted, whether the rates should be made applicable to equipment other than flatbed and van type equipment; whether the proposed rule for overtime should be adopted or amended; and whether the rates should be computed on "portal-to-portal" time.
3. In the event the present format of rates is retained, whether reasonable and enforceable rates result from the application of mileage charges in addition to hourly charges.
4. In determining the above, whether the Commission has or had an adequate and sufficient record on which to predicate its orders.

Discussion

As indicated in CTA's closing argument set forth above under the heading "Position of the Parties", it is CTA's view that the change in format of hourly rates was made on an inadequate record. This contention was disposed of when the Commission denied CTA's petition for rehearing and reconsideration of Decisions Nos. 78264 through 78271.

The meetings in which CTA developed the asserted dissatisfaction of those participating therein with the new format of hourly rates were conducted shortly after said rates became effective and before adequate time had elapsed to judge the effect of said rates under actual operating conditions. The testimony concerning the asserted inadequacies of the new rates was general; no specific transactions were cited by CTA.

CTA also argued that the staff cost study presented in Case No. 6322 does not reflect actual operations under hourly rate conditions and is synthesized from cost data related to class-rate movements. The cost data presented by CTA in this proceeding contains similar defects. The original cost study underlying the hourly rates in MRT 5 is more than twenty-five years old, and the equipment costs and related data have no resemblance to current data. The alternative study presented by CTA uses, in part, data from the staff cost study which CTA believes is deficient. CTA, like the staff, made no study of actual performance under hourly-rate conditions.

The fact that hourly rates do not apply to movements in dump truck or pneumatic equipment is not improper. The cost studies underlying the former hourly rates in MRT 5, the cost studies introduced by the staff in Case No. 6322 and the cost studies introduced by CTA herein contain no data relating to dump truck and pneumatic equipment. The data introduced by CTA herein is based on equipment costs for van and flatbed equipment only. The record shows that pneumatic equipment is more costly to purchase and to operate than van or flatbed equipment. The record is silent with respect to costs of operation of dump truck equipment. The record shows that salt movements in dump trucks under hourly rates resulted in significantly lower charges than under mileage class rates. There are no special circumstances surrounding movements requiring the use of hourly rates except that lower charges result. This is directly contrary to petitioner's concept that hourly rates are for a premium service.

Petitioner's proposal would retain the four-hour minimum charge and the computation of charges based on "portal-to-portal" time, established by Decision No. 78264. These provisions result in higher charges than the former one-hour minimum charge and the former basis for computation of time. Petitioner makes no provision in its

proposal to offset in the hourly rates the increases resulting from the changed method of time computation. Thus, petitioner's proposal would produce higher charges than under the former rates in MRT 5, even though the former rate format would be adopted herein. This form of increase was protested by CMA, Shell and Bethlehem.

For the foregoing reasons petitioner's proposals with respect to the format and levels of hourly rates should not be adopted.

Petitioner also proposes to revise the hourly forklift rates and to cancel hourly rates for movements of shipper-owned trailers to and from rail depots. The evidence shows that most forklift trucks have a capacity of 8,000 pounds or less; and that difficulty of application would result if multiple charges were established for forklift equipment. Therefore, a single minimum rate for forklift equipment is reasonable. The record also shows that the hourly rate for movements of shipper-owned trailers was developed for a special type of service and different conditions surround such service. The rates for such service should be retained.

The Commission staff witness proposed amendment of the rates for 3-axle gas tractors and 2- and 3-axle diesel tractors in combination with a unit of trailing equipment. The present rates reflect a single-axle trailing unit, whereas a typical combination consists of a tractor and 2-axle trailing equipment. The proposal that the rates for units of equipment consisting of a tractor and trailer be adjusted to reflect 2-axle trailing equipment is reasonable and should be adopted.

Findings and Conclusions

The Commission finds:

1. It has not been shown that petitioner's proposals to adjust the format and levels of the hourly vehicle unit rates and related forklift rates in MRT 15 will be just and reasonable.

2. Revision of the hourly vehicle unit rates for combinations of equipment consisting of a tractor and trailing unit to reflect the rates for 2-axle trailing units rather than 1-axle trailing units will be just and reasonable. The increases resulting therefrom are justified.

The Commission concludes:

1. The request of petitioner to revise the format and levels of hourly vehicle unit rates and related forklift rates in MRT 15 should be denied.

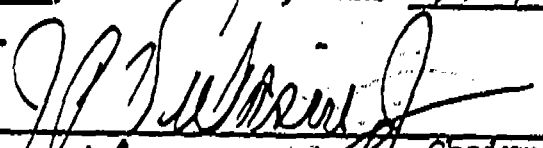
2. The tariff change found reasonable in finding 2 above should be accomplished concurrently with the adjustment of rate levels in MRT 15 pursuant to Petition No. 46 in Case No. 7783, and such tariff changes will be made in the order in said proceeding.

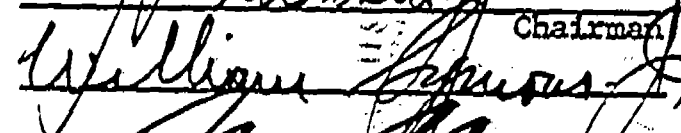
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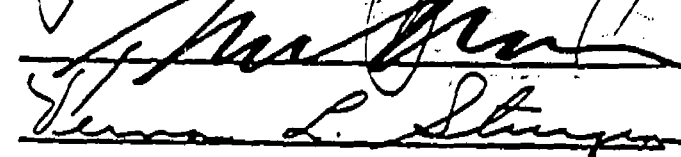
IT IS ORDERED that except as indicated in the findings and conclusions in the preceding opinion the relief sought in Petition No. 41 in Case No. 7783 is denied.

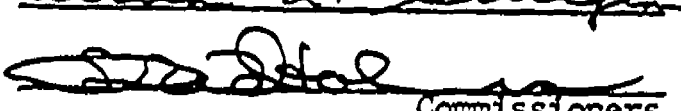
The effective date of this order is twenty days after the date hereof.

Dated at Los Angeles, California, this 14th
day of DECEMBER, 1971.



Chairman





Commissioners

APPENDIX A

LIST OF APPEARANCES

Petitioner: Arlo D. Poe and Richard W. Smith, Attorneys at Law, and H. F. Kollmyer, for California Trucking Association.

Respondents: George D. Russell, for Russell Truck Co.; John D. Swidak, for Bekins Moving & Storage Co.; R. J. Blake and Merritt H. Ellis, for George C. Blake Trucking Co.; Warren Goodman, for Ventura Transfer Co.; Emil O. Fleschner, for Southern California Truck Leasing, Inc.; and Edward N. Edgeworth, for Bulk Freightways, Inc.

Protestants: Ronald W. Behrens and Otha B. Brooks, for Shell Chemical Company, a division of Shell Oil Company; Jess J. Butcher, for California Manufacturers Association; and Harold Summerfield and William A. Watkins, for Bethlehem Steel Corporation.

Interested Parties: James Quintrall, for Los Angeles Warehousemen's Association; Don B. Shields, Don Newkirk and Milton Flack, Attorneys at Law, for Highway Carriers Association; William D. Mayer, for Cannery League of California; James R. Foote and G. Ralph Grago, for Independent Owner-Operators Association; William D. Grinrod, for Traffic Managers Conference of Southern California; D. Livengood, for West Coast Salt & Milling Company; Frank A. Riehle, Jr., Attorney at Law, for Pacific Salt & Chemical Company; Morton S. Colgrove, Attorney at Law, in propria persona; Frank Spencer, for Continental Can Co., Inc.; and Warren P. Mayhugh, for Mobil Oil Co.

Commission Staff: Robert E. Walker, J. M. Jenkins, and Ronald I. Hollis.