

Part 5

1 RODNEY SIDLE

2 e-mails, Bates RJW00780458 through

12:02:46 3 RJW00780461, was marked for identification.)

12:02:46 4 ---

12:02:46 5 BY MR. MacFALL:

12:02:48 6 Q. Mr. Sidle, you've just been handed a
12:02:51 7 document marked as Sidle Exhibit 15 for
12:02:52 8 identification. I would ask you to take a look
12:02:54 9 at that, sir, and tell me if you recognize it.

12:02:55 10 A. All right.

12:06:54 11 (Witness reviewing document.)

12:06:55 12 A. All right. I've reviewed it.

12:06:57 13 Q. Do you recognize this document, sir?

12:06:58 14 A. Yes, I do.

12:07:01 15 Q. And for the record, the document is
12:07:05 16 a series of e-mails, the last of which is a
12:07:09 17 December 31, 2003 e-mail from you to Anton
12:07:15 18 Barendregt, with a cc to various individuals.

12:07:17 19 Mr. Sidle, I would like to direct
12:07:23 20 your attention specifically to the second page
12:07:25 21 of that document. At the bottom third of the
12:07:27 22 page there is an e-mail from you dated
12:07:33 23 December 30, 2003 to John Darley. The subject
12:07:35 24 is: Response to Walter's questions. Do you see
25 that, sir?

12:07:35 1

RODNEY SIDLE

12:07:36 2

A. I do.

12:07:41 3

Q. In the first paragraph you indicate

12:07:44 4

that John Pay advised you that there were

12:07:48 5

certain questions that had been raised by

12:07:50 6

Walter. My question is: Is that a reference to

12:07:55 7

Mr. van de Vijver?

12:08:00 8

A. Yes. Walter meant Walter

12:08:01 9

van de Vijver.

12:08:04 10

Q. Beneath that appears the number 1

12:08:07 11

with a question next to it, which reads: "Is it

12:08:10 12

credible for Shell to claim 'Only with the SEC

12:08:13 13

reserves guidance since 2001 were we able to

12:08:16 14

first realize our internal reserve guidelines

12:08:19 15

and practices did not comply with the SEC proved

12:08:26 16

reserve definitions.'"

12:08:30 17

Do you recall being advised by

12:08:32 18

Mr. Pay that this was a question for

12:08:33 19

Mr. van de Vijver?

12:08:48 20

A. Yeah, he -- I'm trying to remember

12:08:50 21

if it was a phone conversation or an e-mail, but

12:08:55 22

he did advise me that that was a question. Yes.

12:08:57 23

Q. The paragraph that appears beneath

12:08:59 24

that with R-E-S in caps, is that your response

25

to that question that's posed above?

12:09:01 1

RODNEY SIDLE

12:09:02 2

A. Yes, it is.

12:09:07 3

Q. It states: "I do not believe this

12:09:09 4

is a credible position," and then goes on to

12:09:12 5

explain that the reason for that is -- well,

12:09:15 6

I'll read it. It states: "Not only did a major

12:09:17 7

OU in our fold have different knowledge and

12:09:18 8

considerable experience with interpreting the

12:09:22 9

SEC rules, but other outside USA indicators

12:09:25 10

existed," and we'll go through those.

12:09:30 11

With respect to the major OU, which

12:09:32 12

you state had different knowledge and

12:09:34 13

considerable experience with interpreting the

12:09:37 14

SEC rules, was that a reference to SEPCO?

12:09:38 15

A. Yes, it was.

12:09:47 16

Q. You also state "outside USA

12:09:49 17

indicators."

12:09:51 18

The first -- one example that you

12:09:52 19

give is external auditors expressing concern

12:09:58 20

over PSC reserve evaluation oil price practices.

12:09:59 21

Could you please explain for me what

12:10:01 22

you meant by that?

12:10:04 23

A. Yes. Among the information that was

12:10:07 24

shared with me when I was part of Rockford was

25

that at least one of our external auditors felt

12:10:13 1

RODNEY SIDLE

12:10:17 2

that Shell's practice of using our view of

12:10:23 3

future price was inconsistent with the SEC's

12:10:27 4

requirement for use of year-end -- actual

12:10:28 5

year-end price.

12:10:33 6

Q. Do you recall when you had heard

12:10:35 7

that the -- withdrawn.

12:10:36 8

When did you learn that the external

12:10:39 9

auditor expressed that view?

12:10:39 10

MR. SMITH: Objection to form and

12:10:43 11

foundation.

12:10:46 12

A. As I recall, it was as part of the

12:10:50 13

information shared with me during the Rockford

12:10:50 14

episode.

12:10:53 15

Q. Do you recall which auditor that

12:10:53 16

was?

12:10:57 17

A. No, I don't.

12:10:57 18

MR. SMITH: Objection to the form

12:11:00 19

and foundation.

12:11:07 20

Q. You next write: "Current Shell

12:11:09 21

staff who have worked for other companies

12:11:13 22

(outside USA) and more diligently followed SEC

12:11:16 23

rules would have noted our variance from such

12:11:17 24

practices."

25

What did you mean by that, sir?

12:11:19 1

RODNEY SIDLE

12:11:25 2

12:11:28 3

12:11:32 4

12:11:37 5

12:11:43 6

12:11:49 7

12:11:49 8

12:11:52 9

12:11:56 10

12:11:59 11

12:12:02 12

12:12:05 13

12:12:09 14

12:12:10 15

12:12:15 16

12:12:23 17

12:12:26 18

12:12:28 19

12:12:29 20

12:12:30 21

12:12:34 22

12:12:37 23

12:12:38 24

25

A. It's common within the industry, the oil and gas industry, for technical people to move between companies, so there are people within Shell's ranks who had worked for other E&P -- oil and gas companies and observed those companies' practices for booking proved reserves.

Comments that were made to me from certain of those were that they noticed differences between the company that they had worked for before and their practices and interpretations of the SEC rules, and what Shell was doing, in an international -- in an international application of the rules.

Q. With respect to those differences, did they indicate that the Shell guidelines were less compliant with the SEC requirements than those of Shell's competitors?

MR. SMITH: Objection to the form and foundation.

A. There wasn't a conclusion of less or more compliance. It was a note that they were different.

Q. You wrote: "Current Shell staff who

12:12:45 1

RODNEY SIDLE

12:12:48 2

have worked for other companies outside the USA

12:12:52 3

that more diligently followed SEC rules," and

12:12:54 4

then it continues.

12:12:59 5

How is it that -- withdrawn.

12:13:02 6

By that did you mean to express that

12:13:05 7

the other companies more diligently followed the

12:13:07 8

SEC rules than Shell?

12:13:07 9

MR. SMITH: Objection to form and

12:13:16 10

foundation.

12:13:17 11

A. Could you repeat the question,

12:13:18 12

please?

12:13:23 13

Q. Sure. The sentence here references

12:13:26 14

other companies outside the United States that

12:13:31 15

more diligently followed SEC rules. That's what

12:13:32 16

the sentence states.

12:13:35 17

How is it that you learned that

12:13:38 18

these other companies outside the United States

12:13:41 19

more diligently followed SEC rules?

12:13:43 20

MR. SMITH: Objection to form and

12:13:45 21

foundation. I don't think that's what that

12:13:46 22

sentence says.

12:13:48 23

Q. Let's try it this way: What is it

12:13:52 24

that you were intending to convey in that part

25

of the sentence?

12:13:54 1

RODNEY SIDLE

12:13:56 2

A. From the folks that I was talking to

12:13:58 3

that had experience outside of Shell, they were

12:14:01 4

noting that prior experience was a practice, and

12:14:03 5

that Shell was using a different practice, and

12:14:07 6

so they simply noted those two were different.

12:14:10 7

They were different approaches that

12:14:15 8

were intending to follow SEC rules, that at the

12:14:18 9

time the reserves were being determined, both

12:14:21 10

seemed practical approaches. Now, with the

12:14:24 11

hindsight that we had at this point in time, it

12:14:28 12

became clearer that probably the Shell practices

12:14:30 13

were not the ones that should have been

12:14:31 14

followed.

12:14:45 15

Q. Specifically the phrase that "more

12:14:47 16

diligently followed SEC rules," what were you

12:14:47 17

referring to there?

12:14:49 18

A. It was a generalization of the

12:14:51 19

example. I don't remember the details of the

12:14:52 20

conversation.

12:14:58 21

Q. You then wrote, "We simply did not

12:15:01 22

react to these warning signals."

12:15:03 23

And by "warning signals" in this

12:15:09 24

sentence, are you referring to the facts

25

expressed above in that same paragraph?

12:15:11 1
12:15:14 2
12:15:16 3
12:15:22 4
12:15:24 5
12:15:30 6
12:15:31 7
12:15:34 8
12:15:40 9
12:15:47 10
12:15:49 11
12:15:56 12
12:15:58 13
12:16:03 14
12:16:06 15
12:16:07 16
12:16:12 17
12:16:15 18
12:16:19 19
12:16:19 20
12:16:20 21
12:16:26 22
12:16:30 23
12:16:34 24
25

RODNEY SIDLE

A. In all of those examples, yes. Not any one in particular. All of those.

Q. You then also indicate that, "We did not proactively seek clearer understanding of the SEC rules from available industry sources."

What industry sources were you specifically referring to there?

A. A common practice for oil and gas companies would be to use reserve consultants, companies that maintained a high level of expertise and also have contact -- more frequent contact with the SEC than most oil and gas companies do, to bring in another opinion.

Q. Are you aware if Shell's competitors use such consultants?

A. Some do. Some do not.

Q. Were you aware of the use of such consultants prior to your involvement in project Rockford?

A. Yes, I was.

Q. Mr. Sidle, I would like now to direct your attention to the subsequent e-mail, which actually physically appears above that e-mail, and that is dated December 31, 2003 from

12:16:37 1
12:16:43 2
12:16:49 3
12:16:53 4
12:16:56 5
12:16:59 6
12:17:02 7
12:17:06 8
12:17:10 9
12:17:14 10
12:17:17 11
12:17:27 12
12:17:37 13
12:17:41 14
12:17:42 15
12:17:42 16
12:17:44 17
12:17:45 18
12:17:48 19
12:17:48 20
12:17:51 21
12:17:56 22
12:18:01 23
12:18:04 24
25

RODNEY SIDLE

Mr. Barendregt to you. And he indicates that he is going to comment on your e-mail.

He writes on question 1, "You're right on the issues of PSC and lateral size of proved area, of course. The 2001 SEC guidance did not, or hardly, change our perception on these issues and we knew that Group reserves were possibly exposed in this respect," and then it continues. Well, he specifies PSCs only, and then it continues.

Were you aware that there was exposure in connection with PSCs and lateral size of proved areas under the group guidelines?

MR. SMITH: Objection to the form.

A. At which time?

Q. Prior to Project Rockford.

A. No, I was not.

Q. Did Mr. Barendregt ever discuss that with you?

A. No, he didn't.

Q. Did you agree with Mr. Barendregt's assessment that the 2001 SEC -- as he puts it -- guidance really didn't affect that particular issue?

12:18:06 1
12:18:07 2
12:18:14 3
12:18:19 4
12:18:22 5
12:18:25 6
12:18:29 7
12:18:35 8
12:18:36 9
12:18:39 10
12:18:42 11
12:18:47 12
12:18:52 13
12:18:54 14
12:18:56 15
12:18:59 16
12:19:02 17
12:19:07 18
12:19:11 19
12:19:13 20
12:19:17 21
12:19:21 22
12:19:23 23
12:19:26 24
25

RODNEY SIDLE

MR. SMITH: Objection to form.

A. Well, I think actually Anton missed my point. His response was specific to details, and trying to decide which detail we learned about in 2001, and which detail may have been there before. The point that I had in my response was keyed around the word "credible."

Remember the date. The date is the very end of December. And just a little more than a week later Shell has to be in front of a public audience of investors, media, and needs to take a position as to the condition of our reserves.

And the point that I was trying to make in this response is let's not spend a lot of time trying to find excuses or trying to identify exactly what happened when for purposes of that public announcement. That serves no useful purpose. What we need to do, as a corporation, as Shell, is to simply say we made a mistake. We're working to identify all elements of the mistake. We're going to correct the mistake. In numbers, we're going to correct the processes that led to the mistake, and we'll

12:19:28 1

RODNEY SIDLE

12:19:29 2

go forward.

12:19:33 3

12:19:36 4

12:19:41 5

12:19:43 6

12:19:47 7

12:19:51 8

12:19:53 9

12:19:55 10

12:19:57 11

12:19:59 12

12:20:02 13

12:20:05 14

12:20:08 15

12:20:10 16

12:20:12 17

12:20:15 18

12:20:17 19

12:20:21 20

12:20:27 21

12:20:30 22

12:20:31 23

12:20:35 24

25

And so this rather short response that I gave to the John Pay question was all around avoiding lengthy, complex, detailed discussions around individual elements of what did or did not happen, and when it happened, and rather just let's look forward. It's not credible to go back and try to work through all the details. I don't know if I could have done it, or anyone could have done it. Let's just go forward and say we made a mistake.

And then Anton tries to go back through all the details of well, what about LKH, and what about PSCs, and all of that. And certainly his points are quite right, and indeed later, as you see in the document that you've handed me, I agree with certain of those points. But he didn't get the message that this was not the place, and the time, to try to have that debate. What we needed to do at that point, for purposes of that public announcement just a few days later, we needed to simply say we made a mistake. We are going forward. We're going to correct it. And that was my point.

12:20:37 1

RODNEY SIDLE

12:20:40 2

MR. MacFALL: I think we --

12:20:41 3

VIDEOGRAPHER: Four minutes.

12:20:43 4

MR. MacFALL: Why don't we go off

12:20:45 5

the record and change the tape.

12:20:46 6

VIDEOGRAPHER: The time is now

12:20:48 7

12:20 p.m. This is the end of tape

12:20:50 8

number 5 in the deposition of Rodney Sidle.

12:21:10 9

Off the record.

10

12:24:30 11

(Recess.)

12:24:30 12

12:24:35 13

VIDEOGRAPHER: The time is now

12:24:37 14

12:23 p.m. This is the beginning of tape

12:24:39 15

number 6 in the deposition of Rodney Sidle.

12:24:41 16

Back on the record.

12:24:41 17

BY MR. MacFALL:

12:24:45 18

Q. Mr. Sidle, you just gave a fairly

12:24:48 19

thorough explanation of what you intended in

12:24:50 20

your response, and indicating that

12:24:53 21

Mr. Barendregt misinterpreted that in his reply

12:24:54 22

e-mail to you.

12:24:56 23

I would just note, sir, with respect

12:24:59 24

to the public relations aspect, or the investor

25

aspect, the written response actually identifies

12:25:07 1

RODNEY SIDLE

12:25:16 2

things which are contrary, or suggest that a

12:25:22 3

position change within Shell only occurred after

12:25:24 4

the issuance of the SEC guidance.

12:25:29 5

My question is: You gave one fairly

12:25:33 6

elaborate answer, but the written text of the

12:25:42 7

e-mail doesn't say that. If you intended for

12:25:43 8

what you just stated to be the actual response,

12:25:46 9

why didn't you write it?

12:25:47 10

MR. SMITH: Objection to form.

12:25:58 11

A. I intended -- I gave examples of

12:26:00 12

why. The simple short answer of well, we didn't

12:26:05 13

know until March 2001, didn't seem credible.

12:26:06 14

So -- remember, I'm focusing on the word

12:26:07 15

"credible."

12:26:10 16

Is it credible? Will people believe

12:26:13 17

you if you take that stance? And so my answer

12:26:15 18

was look, here's the setting. People are going

12:26:19 19

to dissect every word we say. Do we want to

12:26:21 20

stand up there, do we want to say it's credible

12:26:23 21

to take this position, and then try to answer

12:26:27 22

all of these lengthy questions and details, or

12:26:30 23

do we want to simply say, we got it wrong.

12:26:33 24

We're intending to fix it now. We will change

25

the numbers, we will change our processes. We

12:26:35 1

RODNEY SIDLE

12:26:38 2

will look forward and do it right. That was the point.

12:26:39 3

12:26:43 4

Again, I didn't want to go into

12:26:47 5

lengthy orations here or in the text. Simply,

12:26:49 6

here are some examples of why people might point

12:26:52 7

to it not being credible. So let's just forget

12:26:55 8

that argument. Let's break with this

12:26:57 9

credibility question and simply say we did

12:27:08 10

something wrong and go forward.

12:27:11 11

Q. Besides credibility, the issues that

12:27:17 12

you identify in your response to this question,

12:27:21 13

specifically that SEPCO interpreted and complied

12:27:24 14

with the SEC rules, and the other various issues

12:27:30 15

that you identify, did you also understand or

12:27:32 16

believe -- let me rephrase that.

12:27:33 17

Did you believe that the issues you

12:27:41 18

identified in your response meant that Shell

12:27:50 19

should have recognized that its group guidelines

12:27:53 20

did not comply with the SEC proved reserve

12:27:56 21

definitions even prior to the 2001 guidance?

12:27:59 22

MR. SMITH: Objection to form. And

12:28:01 23

foundation.

12:28:05 24

A. It's certainly very difficult for me

25

to put myself in the international position that

12:28:07 1

RODNEY SIDLE

12:28:12 2

Shell faced as of the day and know what the

12:28:15 3

circumstances were in which they created the

12:28:20 4

rules in which they operated -- whether meetings

12:28:25 5

that were legendary were actually held or not --

12:28:27 6

those are things that I didn't know then and in

12:28:28 7

some cases don't know now.

12:28:31 8

However, in 20/20 hindsight today,

12:28:33 9

and knowing what I saw in Rockford, certainly --

12:28:37 10

which is knowledge I had at the time I wrote

12:28:40 11

this -- it certainly led me conclude there were

12:28:43 12

opportunities for sharing of knowledge that,

12:28:46 13

with 20/20 hindsight, I wish people would have

12:28:48 14

taken advantage of.

12:28:50 15

Q. And also in light of when this was

12:28:54 16

written, which is after the start, certainly, of

12:28:59 17

Project Rockford, you also wrote that there are,

12:29:06 18

or there were, warning signals to which Shell

12:29:09 19

did not react. And is that a view that you held

12:29:11 20

when you wrote this, that there were warning

12:29:13 21

signals?

12:29:15 22

A. Well, as I was learning things,

12:29:18 23

through going through Rockford, I started to see

12:29:20 24

some of the documents that you have showed me,

25

or other things similar to that, and to me -- we

12:29:24 1

RODNEY SIDLE

12:29:26 2

talked about being able to sense where there's

12:29:29 3

something that needed greater depth of study --

12:29:31 4

to me, I couldn't conclude whether they were

12:29:34 5

right or wrong, but I could conclude that those

12:29:37 6

were things that probably needed some study.

12:29:39 7

Q. Based on your experience as an

12:29:43 8

auditor within SEPCO, during the course of

12:29:47 9

Rockford, along those same lines, did you see

12:29:51 10

things that you thought were -- should have --

12:29:53 11

were red flags for auditors, in connection with

12:29:54 12

proved reserves?

12:29:55 13

MR. SMITH: Object to the form.

12:29:57 14

A. Within SEPCO?

12:29:59 15

Q. No. Let me rephrase the question.

12:30:00 16

Based on your experience as an

12:30:05 17

auditor in SEPCO, during the course of Rockford,

12:30:09 18

did you see things that you believed were red

12:30:11 19

flags for auditors concerning the booking of

12:30:12 20

proved reserves by the group?

12:30:16 21

MR. SMITH: Objection to form.

12:30:22 22

A. Well, during my -- my initial

12:30:24 23

participation in Rockford, I started to have

12:30:30 24

access to certain data, and while I wasn't in a

25

position to, in almost all of the cases, have

12:30:34 1

RODNEY SIDLE

12:30:39 2

sufficient detail to reach a full conclusion,

12:30:42 3

certainly the things that were shared with me,

12:30:46 4

if I had been auditing such a situation in

12:30:48 5

SEPCO, would have led me to ask some additional

12:30:52 6

questions to better understand the circumstances

12:30:56 7

of that volume and that field's booking.

12:30:57 8

MR. MacFALL: Why don't we go off

12:30:58 9

the record.

12:31:00 10

VIDEOGRAPHER: The time is

12:31:02 11

12:30 p.m. Off the record.

13:05:15 12

(Lunch recess taken at 12:30 p.m.)

13

14

15

16

17

18

19

20

21

22

23

24

25

1
13:05:20 2
13:05:20 3
13:16:53 4
13:16:56 5
6
7
8
9
13:16:57 10
13:16:57 11
13:16:58 12
13:16:59 13
13:17:02 14
13:17:05 15
13:17:09 16
13:17:10 17
13:17:13 18
13:17:19 19
13:17:25 20
13:17:33 21
13:17:36 22
13:17:40 23
13:17:40 24
25

RODNEY SIDLE

A F T E R N O O N S E S S I O N

(1:16 p.m.)

VIDEOGRAPHER: The time is now

1:16 p.m. Back on the record.

R O D N E Y S I D L E ,

resumed as a witness, having been
previously sworn by the Notary Public,
was examined and testified further as
follows:

EXAMINATION (cont'd)

BY MR. MacFALL:

Q. Good afternoon, Mr. Sidle.

Mr. Sidle, are you familiar with something known
as the reserves committee?

A. Which reserves committee?

Q. Let me try a different question.

Did you serve on any reserves committee within
the group during the period of 2000 to 2004?

A. In late 2003, in the early part of
2004, I was a member of the Shell E&P reserves
committee. I was also a member of other
reserves committees in industry, so hence my
question.

Q. Thank you. With regard to the Shell

13:17:42 1

RODNEY SIDLE

13:17:46 2

E&P reserves committee that you were a member

13:17:48 3

of, what was the purpose of that committee?

13:17:55 4

A. The committee was formed prior to my

13:17:59 5

joining, I believe in the middle -- earlier in

13:18:09 6

2003, or perhaps even late 2002. It was put in

13:18:10 7

place, to the best of my knowledge, to be a part

13:18:17 8

of the Shell E&P process of reviewing the proved

13:18:22 9

reserves disclosures that Shell made.

13:18:27 10

Q. Can you identify the other members

13:18:30 11

of the committee at the time that you joined?

13:18:42 12

A. At the time I joined, Frank Coopman

13:18:44 13

was a member, I believe chairman of the

13:18:44 14

committee.

13:18:45 15

John Pay was a member of the

13:18:46 16

committee.

13:18:49 17

And John Darley was a member of the

13:18:50 18

committee.

13:18:52 19

There may have been others. Those

13:18:53 20

are the ones I recall.

13:18:56 21

Q. Mr. Coopman, was he the CFO of the

13:18:57 22

group at the time?

13:19:00 23

A. He was the CFO of E&P.

13:19:02 24

Q. Thank you. And I believe we had

25

identified Mr. Pay as the group reserves

13:19:05 1

RODNEY SIDLE

13:19:08 2

coordinator. Did he hold that position at that

13:19:08 3

time?

13:19:09 4

A. Yes, he did.

13:19:13 5

Q. I'm sorry. I just don't recall if

13:19:15 6

we talked about Mr. Darley previously, but what

13:19:17 7

position did he hold within the group at that

13:19:17 8

time?

13:19:20 9

A. John Darley was the head of the

13:19:25 10

technology part of Shell E&P.

13:19:32 11

Q. You talked about the committee's

13:19:38 12

purpose at the time of formation. Could you

13:19:41 13

describe generally your activities as a member

13:19:45 14

of that committee?

13:19:48 15

A. Yes. At the time that I joined the

13:19:53 16

committee, it was to provide a perspective that

13:19:56 17

I had acquired as part of SEPCO on the

13:20:01 18

determination of SEC proved reserves.

13:20:05 19

Q. Did you share that perspective with

13:20:06 20

the other members of the committee?

13:20:08 21

A. That's what I was asked to do. Yes.

13:20:14 22

Q. Were there any actions taken based

13:20:17 23

on your perceptions as shared with the

13:20:19 24

committee? And by actions, I mean actions by

25

the committee.

13:20:21 1

RODNEY SIDLE

13:20:22 2

A. Well, the way the committee

13:20:28 3

functioned was that issues from within the

13:20:33 4

group, Shell E&P, that related to reserves were

13:20:39 5

brought to the committee. The committee engaged

13:20:45 6

parties that had knowledge of those issues to

13:20:48 7

provide comment on the elements of the issues

13:20:54 8

that were critical to a decision, that would, in

13:20:56 9

some cases, have included my observations, and

13:20:58 10

then they took a decision.

13:21:00 11

Q. When you say a decision, was that

13:21:02 12

with respect to whether or not to book proved

13:21:03 13

reserves?

13:21:04 14

A. That was among them. Yes.

13:21:06 15

Q. What were some of the other

13:21:09 16

decisions that were to be made by the committee?

13:21:12 17

A. Oh, other things about reporting of

13:21:15 18

proved reserves. About process, internal

13:21:20 19

processes, of how things were done. The form of

13:21:26 20

the data capture that was the ARPR. Language

13:21:29 21

that was in the guideline document. Things like

13:21:29 22

that.

13:21:34 23

Q. At the time that you were on the

13:21:36 24

committee, did the committee make any

25

recommendations concerning revisions to the