Broadband for All Permitting Roundtable February 11, 2025 10:00 a.m. – 11:00 a.m. Meeting Recap and Transcript

The Broadband for All Permitting Roundtable met virtually on Wednesday February 11, 2025, at 10:00 a.m. OBDL Access and Deployment Advisor Maria Kelly welcomed attendees and provided a quick overview of the meeting.

Agenda

Access and Deployment Advisor Maria Kelly Maria Kelly briefly provided an overview of the Broadband for All Permitting roundtable agenda for the day.

Agenda Item 1 – Broadband for All

Maria Kelly provided a recap of the Broadband for All Action Plan with a recap of the timeline for Broadband for All, including the creation of the Broadband Council, Executive Orders, Senate Bill 156, Middle Mile Broadband Initiative and Last Mile Programs, and Infrastructure Investment and Jobs Act Broadband Programs and the goals of the Broadband for All Action Plan. Access and Deployment Advisor Maria Kelly provided an overview of the Broadband for All Action Plan regarding permitting at the local, state, and federal levels. She also highlighted Action Item 6, which charged the California Department of Technology to explore various actions to enhance permitting processes at all levels of government through meaningful partnerships.

Agenda Item 2 – Permitting Load Projections

Access and Deployment Advisor Maria Kelly provided permitting load projections highlighting CASF, MMBI, FFA, and BEAD programs and when they would be administered through the year 2030. Maria concluded this section by explaining permitting impacts and reducing permitting barriers will always be a priority.

Agenda Item 3 – Enhancing Permitting Processes

Access and Deployment Advisor Maria Kelly shared two permitting smart practices: developing and sharing information about relevant permitting and processes and optimizing permitting for broadband projects. Each smart practice has several actions associated with them that were briefly touched on in Ms. Kelly's presentation.

Agenda Item 4 – Permit Streamlining in the Coastal Zone

California Coastal Commission Transportation Program Analyst Melba Policicchio presented on permitting the Middle Mile Broadband Network in the coastal zone. Melba Policicchio touched on several topics. She first provided an overview of the MMBN project and the significance of building a public open access middle mile network to connect all Californians. She then provided an overview of the CA Coastal Act including key Coastal Act policies and transportation program and permitting jurisdiction within the Coastal Zone. Ms. Policicchio then provided a summary of permitted miles per district as well as the number of permits issued to date, including waivers. She then touched on streamlined permitting process for the MMBN project, including design guidelines, dedicated staff, and environmental documents. Melba Policicchio concluded her presentation with tips for managing challenges including working with a compressed timeline, permit special conditions, joint build entities, and consistency with policies.

Access & Deployment Advisor Maria Kelly moderated a roundtable Discussion session with Melba Policicchio and spoke on a variety of coastal permitting best practices, coastal permitting guidelines, as well as highlighting success stories. There were questions and comments that came in through the Chat box, and one meeting attendee raised their hand and came off mute to ask a question.

Courtney Even, City of Oceanside

Agenda Item 5 – Resources

Maria Kelly provided a recap of the Broadband for All Portal planning and permitting resources page. She also gave examples of resources and links to those resources at the federal, state, and local levels.

Closing Remarks

Access and Deployment Advisor Maria Kelly gave closing remarks, thanked all attendees and panelists for their time, as well as provided attendees with the Broadband Readiness survey.

Roundtable adjoined at 10:40 AM.

Transcript

Welcome, everybody. We're just getting started. And we can see you, we're leaving the chat open so feel free to introduce yourself in chat as we typically will do. And we want people to know who, who's here. Also, as questions come up, please feel free to drop them in chat, but we'll also have plenty of time to raise hands, come off camera and ask your questions directly, so whatever works best, and we'll just give another minute, and we'll get started. Alight, I'm going to pop that out. Okay alight, people can come in as they come in some of, because we always start with sort of the background of broadband for all, we will start there. But 1st I want to welcome everyone. My name is Maria Kelly. I realize we didn't put that on the title slide today. That's okay. My name is Maria Kelly. I'm in the California Department of Technology's Office of Broadband and Digital Literacy. Many of you, we've met, or we've connected over some of these round tables before and it's really nice to have you all here again this morning. So next slide, Luke, let's get started. As always, we always want to have a high-level agenda. We do have a guest with us today, super excited to hear from her, and you'll hear more about her during the streamlining permit streamlining the coastal zone. We always have to do a little bit of background on Broadband for All, even though it's repetitive, it's always important to level set. We understand where we will go through this agenda. Lots of time for Q&A. We've built in a lot of time at the end, based on some of your questions that came through when you registered. Some of the questions were definitely related. Do we have enough time for conversation? And we absolutely have planned for time for conversation. Next slide, please, Luke. And we'll go through these first few slides fairly guickly. So, reminder Broadband for All access, Affordability Adoption. This is a priority for the State of California. We're going to be discussing sort of under the access flag, as always when it comes around permitting and permit streamlining. And once we, you know, our office looks at affordability and adoption as well, and that's our digital equity framework. Next slide, please. How did we get here? Broadband Council was established in 2010 already recognizing at that point in time that the digital divide was real in 2020, started taking some real active steps to make sure that the digital divide closed. So, the State, in conjunction with the Federal Government, really started to focus on how we were going to do that. This is a framework for the State of California, and you can see down there on the bottom all the different activities or the ways we are connecting as a State to work through some of the programming. Again, to close that digital divide and and specifically enabling the Middle Mile Infrastructure program as well as other Digital Equity Act programs within the CDT. Next slide, please. What are some of the actions that we've taken already historically, over the last few years? And then at some point we'll start looking future forward as well. Specifically, Action Item 6 around Broadband for All, ways to explore permitting processes at all levels of government. Primarily we've discussed for the most part the Middle Mile Initiative. Our office has discussed the Middle Mile Initiative as we sort of look future forward and we'll have a slide that we'll be sharing this morning. Looking at last mile and really shifting a lot of this focus to BEAD and Public Private Partnerships all housed within the CPUC. So, knowing that there's been connectivity and work to get us to this point, and now we're

looking forward. As always, it's always important to look at all the things that the Federal Government has provided for us, especially when it comes to environmental. And I will share that resource list with you, as I always try to do off of our portal page, so you can see in the highlights of all the different important areas around the Federal requirements. Next slide, please. So, here's what NTIA had developed a slide that I really, really loved, and it showed sort of the impacts of just the BEAD funding and sort of the curve that would be associated with it. So, worked with our consulting team to say, "Hey, when we look at permitting, just at the State of California (and I did work through this slide with MMBI team as well as CPUC, just because, again, it's a kind of a moving target) but what's our best guess in looking at permitting load projections like, when is local government? When are we going to see those bigger impacts of either private sector or public partners coming and really starting to accelerate the demands on the permitting agencies?" And this is, would love any feedback or discussion towards the end of thoughts around this, but really wanting to highlight that when we're looking forward, we're looking at permitting projections well into 2030 as well as noting that CASF is always going to be ongoing and reducing the barrier to permitting is always going to be a priority. Whether we have these historical investments permitting is always going to be a priority as far as once we look forward, once broadband's been deployed and you're looking at operations, there's going to be permitting impacts. Next slide, please, Luke. And we will share this, this presentation will be shared. For today's conversation, I did go through the permitting playbook and sort of in preparation for when we hear from our Coastal Commission Partner, Melba, really reminding us that there's some very, you know, specific best practices to really focus on from a local government perspective and local agency perspective. Some of this will be, you know, shared again, sort of as best practices cannot stress enough that some of these action items are, are really, are really designed and intended, and their lessons learned in the field. So these are some of the ones just wanted to highlight, again, that permitting playbook is still on is online, and we are reviewing it to determine if there's areas that we may want to enhance that, make a little bit more clear, or just continue to create a tool for all of our local government partners to use. Next slide, please. We're going to drop our presentation. I'm going to let Melba introduce herself and talk a little bit about her background, her role in broadband. And it's extensive because she's been one of the leads, probably, I'll let you say it Melba, but probably the lead on that Middle Mile Partnership on the coastal zone and for, frame of reference, highlighting some of the coastal, some folks may say, but we're not coastal - we're inland - understood. The idea is that best practices are best practices. There is no one size fits all for any of our regions. There's just things that we need to take into consideration, but providing some examples of how the success of partnership and coordination has helped with the Middle Mile Initiative in the coastal zone, and with that I'll pass it over to you. I'm sorry, Mel, but can you please unmute.

I'm sorry. Hi, I'm Melba Policicchio with the Coastal Commission, and I'm going to start sharing my screen right now so that I can have a background when I'm talking. Alright! Can everyone see that? Melba, you're showing our presenter mode. If you want to flip, flip to the other one, where we just see the PowerPoint.

Oh, gosh, okay.

That's okay. We're going to do that sometimes.

Yeah.

No big deal. The easiest way would be to stop sharing Melba, and then you can go ahead and just start the presentation. And then when you share screen, you can then hit the presentation application. So, start it first, then you share, and then you should be able to see it.

Okay. Entering show. Okay, hold on. I thought I started it. Oh, slideshow, from beginning. Sorry everyone. Okay. Let me now...sorry. Oh, Zoom, share.

There you go! There we go! For reference everyone, all our government agencies are typically working in Teams. So, when we transition between Teams and Zoom, sometimes there's hiccups. But thank you for your patience.

Sorry about that. Yes, I thought I had it earlier, but I guess I needed a little bit more practice, anyway. Okay, so I'll begin. So again, I'll introduce myself. Good morning. My name is Melba Policicchio, and I'm currently the coastal program analyst in the transportation program for the California Coastal Commission. Up until a few months ago I was the broadband specialist and worked solely on the Middle Mile Broadband Network Project, coordinating with CDT, Caltrans and local Government agencies to help process a series of programmatic coastal development permits for the Middle Mile Project. So today, I'm just going to provide a brief summary of the project within the Coastal Zone, and I'll touch on an overview of the Coastal Act, the Coastal Commission permitting authority strategies we use to develop the permit and a few tips to navigating the permitting process. So, this is everyone's probably seen this map. So, Governor Newsom, I'm just, going, I know you guys have all heard this, but it's part of my presentation, so I'll go ahead. Governor Newsom signed into Law Senate Bill 156 in 2021 to create an open access Middle Mile network. SBF, 156 provides 3.25 billion in funding to build the necessary infrastructure to bring Internet connectivity to homes, businesses and community institutions with the goal of closing the digital divide. Originally the project included 10,000 miles, a 10,000-mile network. However, due to funding issues, the network was reduced to 8,000 miles. The network map you see here was redesigned around July of 2024, and several of the original Caltrans build segments, were reallocated to joint, build or lease. And CDT has entered into partnerships with different entities, including local and tribal governments for these other, these segments that have been reallocated. And just so we understand the main goal of the Middle Mile Broadband Project is to ensure all communities have fast, reliable access to an afford, at an affordable cost. This network is essential and is the public backbone for the high-speed internet, which is so integral and necessary for our daily lives. As some of you likely know, a set of grant programs support Last Mile network that will use the

Middle Mile network to provide important connectivity to specific local areas. So, I'm going to briefly touch on what we do. The California Coastal Commission is committed to protecting and enhancing California's coast and ocean for present and future generations. It does so through careful planning and regulations of environmentally sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination. The California Coastal Commission was established by Voter Initiative in 1972, otherwise known as Prop. 20 and later made permanent by the Legislature through adoption of the California Coastal Act of 1976. The Coastal Act is a land use planning law that applies a specific set of land use, planning principles and resource protection provisions to the California coastal zone. And it includes specific policies that address numerous issues, such as shoreline public access and recreation, lower cost visitor accommodation, terrestrial and marine habitat protection commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, public works. So, it's pretty extensive. The policies of the Coastal Act constitute the statutory standards applied to planning and regulatory decisions made by the Commission and by local governments.

Just to give you a little more background. I'm a member of the Commission Statewide transportation unit. We process the permit. We who process the permits for the middle mile project in the coastal zone. We focus primarily on reviewing coastal development permit applications for transportation projects such as roads and bridges and rail networks. We coordinate with Caltrans to ensure Coastal Act, consistency of statewide transportation, planning efforts as well as district wide plans and corridor planning initiatives through early project coordination. We ensure critical infrastructure, resilience and expand multimodal transportation and coastal public access opportunities. So this is the map. I know it's a little bit hard to see, because California is quite large, but the coastal zone encompasses both land and water along the length of the California coastline from Oregon border to the Mexico border, so you can see the outline of the counties. The coastal counties in this map are in red, is where the coastal zone is.

The Coastal Commission is broken up into 6 different districts along the coast from north coast to San Diego. Within each district are cities and counties with certified local coastal programs also known as LCPs, who have permitting authority in their area. However, there are some locations where the Coastal Commission has retained permit authority, notably public trust lands. Currently there are 76 local governments that have all, or a portion of their jurisdiction within the coastal zone. Sometimes a project can cover areas of both jurisdictions, and in this case, applicants can ask for a consolidated permit process and therefore only need to obtain a permit from the Coastal Commission alone. The Coastal Act specifies specific goals for coastal conservation and development, aimed at protecting and enhancing and restoring coastal environmental quality and resources, giving priority to coastal dependent development and maximizing public access to the coast. I've listed a few key policies here. Sometimes I highlight the Coastal Act policy 30251 which protects visual resources and states that development shall be cited and designed to protect views to and along the

ocean and scenic coastal areas and development should be visually compatible with the character of the surrounding areas. This one trips up a lot of people, so I wanted to highlight that one. So here. I'm going to starting with some strategies that we used early on, the Commission recognized the great importance of the broadband project, so we therefore sought to work with CDT and Caltrans to expedite permitting for the project. To date, we issued 6 Cultural development permits for the Middle Mile Broadband Network covering 300 miles of Caltrans right of way. This includes all the original proposed network in the northern half of the state, and much of that in the southern half.

Early coordination is essential to help identify any project components that may be problematic. We work closely with Caltrans and CDT to help identify design features and construction methods that would have the least impact on coastal resources. To help identify any potential coastal resource impacts and better assess the natural environment along the project extensive corridor, the Commission and CDT hired a consultant to prepare a coastal resource evaluation report for the project which banned approximately 450 linear highway miles. We then collaborated to ensure the project design and development would avoid impacts to coastal resource, identified in the report. Coordinating with Caltrans and CDT early in the permitting process helped establish numerous avoidance measures, making the project consistent with Coastal Act and making permitting much easier. Given that the network was so large it inevitably covered areas, both local and state coastal jurisdiction. As mentioned, the consolidated permit process allows one to reduce permitting needs. So on behalf of Caltrans, we reached out to all the LCPs to request a consolidated permit process for each Caltrans district. Well, we often do consolidate permits, those are usually small, like covering a small area, and here, for the first time, we came up with an unusual strategy of consolidating an entire district. So, for instance, Caltrans district one is Humboldt, Del Nor, and Mendocino counties, so it spans, literally spans over a hundred miles. So this greatly reduced the number of permits needed down to one. For some district project jurisdiction involved over 10 LCPs. So instead of obtaining 10 to 15 permits, there was only one. We also developed project specific design guidelines for Caltrans during the early design phase to help ensure development would comply with coastal act policies. The project guidelines also helped to develop numerous mitigation measures to avoid any impacts to coastal resources. The guidelines were yet another tool in developing a programmatic permitting process for the project. I've also added a few questions to this slide that applicants should consider during project development to help them better understand coastal resource concerns. The Coastal Commission and CDT had the foresight also to hire 2 dedicated staff employees to handle all the broadband permits, I, being one of the staff members. Staff focused on the project, the construction methods, all coordination with Caltrans and local governments. They developed specific expertise for the broadband infrastructure and the necessary technical documents needed for the permit application. To recap the Coastal Commission covered hundreds of miles of broadband network across delicate coastal resources areas throughout the entire state and did that in only 6 coastal development permits. This was a great. This was greatly reduced permit workload for CDT and

Caltrans, and a novel and unique method of streamlining permit review for which we have learned much ourselves. Construction of some of the Middle Mile Network is underway with much more to follow this year. We look forward to seeing this important project develop and look forward to supporting the Last Mile network connections that will make it truly complete. On that note feel free to reach out to our team at the Commission as a contact point for your local governments as you work on Last Mile projects in the coastal zone. And that's all I have for you guys.

That's a lot. Thank you. Melba.

Sorry. I know that was probably a lot, you know.

So it was good. A- again, Luke, If you can drop, or if you or we can stop slide share, people feel free to come off camera. I have a couple of questions that came to mind just why you were discussing, and it's just to help seed the conversation, but also, super curious. Is there when it comes to consolidated permitting is the other term can be batch permitting, there's different ways to describe it, is there a good example of that consolidated permitting that you could provide of sort of either a community or a region that did a really that really has done a good job at that?

So, so in, we've, you know, so local governments can say we don't want to want a consolidate permit. But you know we had a couple of areas where that did occur down in Los Angeles County. There were a couple of local governments that said that they didn't want to consolidate, and so that segment was out of you know they had, Caltrans had to go directly to those counties and ask for a separate permit from them. So for the most part, you know, the local governments are willing to consolidate you know, and it's not a long process to ask for the consolidation, it's just a simple request. And all of them have, all the coastal agencies do have that set up where you can ask for a consolidated permit process. So I'll go back to District One, and they had 10 local government that had jurisdiction in the area. So all 10 of them agreed to a permitting process, consolidated, permitting process. So once they agree, then we, we process the permit, the entire permit.

And the point I suppose I'm trying to make is that the consolidated permitting isn't just a unique process or a best practice in a coastal zone. There are ways to do batch consolidated permitting in other areas as well, whether it's in at a county level or a coordinated local level between multiple agencies or governments. Or I mean, that's really a best practice that could be applied throughout the State. Correct?

Yes, yes, of course. Yes.

Because a lot of times that question, that basic question is like, what's one of the, you know a lot of the questions that against couple of the questions that we got during registration is really understanding and learning what some of these practices or best practices might be. And while that we, we touch on them, this is real life practice, where it absolutely worked.

Yes.

So highly encourage that coordination and people feel free to raise your hand or jump in. My second question is around permitting guidelines again acknowledging and recognizing that different regions, everybody has sort of different barriers or different hurdles, whether it's topography or just bigger coordination. How did you develop your permitting guidelines? And is there a place that people can find it as an example?

Okay, so we've, the guidelines were internally shared with Caltrans, and so I will need to check in to see if we can provide those same guidelines publicly.

Okay. No prob.

I think it started with understanding how the project was going to be developed. And CDT had set up their own set of guidelines on how the project needs to be developed. After reviewing those guidelines, we came up with our own guidance of like, if you're developing in the coastal zone, and there is environmentally sensitive habitat area right here, the construction method preferred would be perhaps micro trenching versus trenching down through Esha because it's not allowed. Also for visual resources, we said like, instead of putting signs up, you can put a metal disc marker on the highway to note where that vault or that line is versus putting a sign up. This is what we prefer, this is, you know, if it's completely infeasible, that's infeasible, but this is what we're asking to in order for you to comply with the Coastal Act. And then there was. And then, you know, the guidelines also said, you know, if you know, if the line could be moved from one side of the road to the other to avoid impacts in a certain area that was the best practice.

So, a lot of engagement, lot of engagement with that local government, and I'm sorry I'm asking all the questions, but we do have a couple, I have one coming in. But we touched when you and I talked yesterday one of the considerations that I hadn't thought of before, from a local, you know again that local coordination as it relates to Middle Mile is for local communities, whether you're in the coastal zone or not, is to understand and identify where those huts, the huts are right. That was part of our conversation, like where those Last Mile connections may come in. So, understanding where the huts are from your local planning, again doesn't matter where you are in the state.

Right, right, right.

I have, Hi Courtney. We can look for if you want to come off and ask your question. I think that there's multiple types of guidelines that are out there and available that are publicly available. I think that we were saying that some of the coordinated ones are still internal guidelines. But there are some other places that have developed guidelines. And you're in the North County, San Diego coastal community, do you have, Courtney would you like to ask a specific question of Melba?

No, not specifically. I just, any type of guidelines that you guys can reference would be a huge help. I'm managing the City of Oceanside's Fiber Optic project here, where we have 2 companies and or utilities working within the city, and then also for the City of Vista. And so, any support and guidance, to keep things moving successfully would be appreciated.

Okay.

Thank you so much

Yeah, thank you for that. And again, so it's that coordination piece. Right? So again, local governments can develop their guidelines as well. So if I'm understanding correctly, there's some communities that you're working in that do not have their local guidelines developed as part of the permitting process. Is that what you're saying, Courtney?

They do to a certain extent. But when it comes to these type of large-scale projects, we can always strengthen that and create a more, a better foundation for the process. If you will.

Right.

I appreciate that. Does anybody else. We're way ahead on time, which is always great, but would also like to make sure we have some time for any additional questions, because that as we wrap up, I'm just going to be covering resources and taking a survey. So if anyone has any specific questions on best practices or any other questions specifically for Melba around the Coastal, would love to hear from you. Alright. Well, we can think about it. Luke, if you want to pop up the slides, I can go over the resources that we have available that we've cultivated for the portal and take a minute. Alright, and we will drop this link in chat. Would love for you to take a moment to open it up and take a look at it. Again, the permitting playbook was updated in 2023. In this early spring, May 2023, I believe, was when we published the updated one. So again, we're always reviewing and taking a look at it, but more significantly, is the recent, is under the partners tab. If you go to the next slide, Luke. Cause partners is for planners and jurisdictions. I actually, you know what I had a side by side. Go back, that's fine. If you go under Partners and you link down, you can find a Funding Finder. If you can drop the Funding Finder into chat, Luke. What we did recently, was basically we always update that as much as possible. And we have some new updates that will be coming once the CPUC sort of really starts to launch the Bead project their Bead funds. But there you can find all the federal state funding available for infrastructure. That's the second most asked question, is people and local jurisdictions and agencies trying to find funding. Keeping in mind that a lot of this funding comes on a rolling basis. So we have tried to identify for 2025, 2026 when some of this rolling funding as it rolls out, or budget allocations happen, we keep that updated. There's also some state infrastructure funding. There's 1 State infrastructure funding that is operated by the State of California. And it's more of a loan program or a versus an actual outright grant program and it's a good opportunity to start exploring. If you are entering into some sort of public private partnership, or you're looking for some funding, I encourage you to explore the funding finder and go ahead and take a look at all the availability. It's a pretty extensive list, and we are working on some of the formatting bugs that we're

having there, but there is a lot of information. And again, we cultivated that all from the federal and the state. The one other place that I would like to draw your attention to is within the Broadband for All portal as well. Again, if you go to the Partners and you click on resources and toolkits. Everything uploaded there has been, is mostly NTIA, which is important, for again, there's best practices. There's how to reduce the barriers. There's planning. There is one new link that I'll be updating, that we need to update from a GIS package that the NTIA put together.

But even though those are all the federal guidelines it's applicable to, it's very applicable to what you need to consider for your local region. Again, going back to that permitting sort of, the load projection. The largest next load projection is going to be, Luke, can you go back to the load projection slide just as an FYI. It's the end of, so here we are beginning of 2025, there's still Federal funding coming through for those as the FFA funding for that was Last Mile project. But you're going to see a ramp up potentially again in those Bead Program deployments. When you look at the new bead map that just came out on the 7th and we can drop that map into chat, and you can see the areas where those priority projects have been identified. So, they're all over the state, and so those where those overlays are local jurisdictions, you're going to want to be prepared. Bruce dropped a C-span, there you go, thanks Bruce. He dropped a link to the Coastal Commission C-span. Appreciate that. Lots of technical specificity there under Agenda Item 12. So, appreciate that resource as well for those questions. I, if nobody has any other questions, Luke, if we can go to the very end of our presentation. I never have a problem ending early. Go back one. Sorry, Luke, go back to the one. Again, these links are live. So, we'll post these in the portal, so you can go ahead and link out to these. We're also dropping them in the chat. Always looking at those NTIA strategies. Again, the Local Jurisdiction Playbook, tracking, CPUC, and again, CETF getting connected, a resource guide for local and regional governments. It's always going to be important. It still continues to be important over the next several years that we continue to engage with local government as we move into Last Mile permitting, and then finally go ahead and go to the last slide, Luke.

Finally, please stay connected. We believe there is still a GO-Biz contact. We used to partner more with GO-Biz on this, that GO-Biz still has link outs also to funding. And if you have any questions for your local region or local jurisdiction around other permitting, you can always reach out to GO-Biz. We're focused definitely on sort of the best practice piece of it. Reach out to us if you have any questions. And then finally, we do have a very short survey that we've been running keeping track for quite a while. Always trying to assess where, where local jurisdictions are at, or how we can help frame round tables with the applicable information that's most helpful as it relates to permit streamlining and Action Item 6. If you could just take a few minutes to please help us track on our forms link. Again, it's a short survey. The information definitely helps identify what we can help cultivate or making sure that we're cultivating the appropriate information for you as you're doing your work. And with that, Luke, you can stop recording.