HOUSING DEPARTMENT

Impact Analysis Report

OVERVIEW

The Housing Department is responsible for the collection of fees related to the Rental Rights and Referrals Program (RRRP) and for the collection of Inclusionary Fees, Affordable Housing Impact Program, Rental Mediation Penalty Fees, Homebuyer Subordination Fees, and Multi-Family Fees. The proposed changes to the Housing Department's fees and charges will increase the department's overall cost recovery rate from 97.5% in 2016-2017 to 99.9% in 2017-2018.

The RRRP fees are collected from property owners, renters, and mobilehome owners to support work associated with implementation of the Apartment Rent Ordinance and Mobilehome Ordinance. The fees are set at an amount to cover the estimated costs of providing the Program, which includes mediation services to settle tenant-landlord disputes, information and referral services, and outreach and education services.

On April 18, 2017, the City Council expanded the scope of the Rental Rights and Referrals Program by approving an Ellis Act Ordinance and directing staff to return to City Council with a revised Tenant Protection Ordinance (TPO) which will be presented on May 9, 2017. The TPO will provide all tenants with just cause protections from no-cause evictions. A new Ellis Act Fee and fee increases for increased staffing to sufficiently administer, monitor, and enforce the newly adopted Tennant Protection Ordinance are recommended in 2017-2018.

The City's Inclusionary Housing Policy, established in 1988, requires affordable housing units in newly-constructed forsale housing developments with greater than 10 units that are located in former Redevelopment Project Areas. In limited circumstances, developers may choose to pay an "in-lieu" fee instead of building the required affordable units in the Although redevelopment agencies in development. California have been dissolved, the relevant provisions of the California Redevelopment Law requiring housing affordability in residential construction in Redevelopment Project Areas have not been repealed. Therefore, San José continues to implement its Inclusionary Housing Policy and require affordability in newly-constructed for-sale developments in those areas. For more information on the City's Inclusionary Housing Policy, please visit the Housing Department's website at:

http://www.sanjoseca.gov/index.aspx?NID=1307.

On January 12, 2010, the City Council approved the Inclusionary Housing Ordinance ("the Ordinance"). The Ordinance generally requires that, in market-rate for-sale developments of 20 or more units, 15% of the units be made affordable to and sold to moderate-income households. The Ordinance provides numerous alternative ways that the developer can meet this requirement, including payment of an in-lieu fee and construction of affordable units off-site, among many others.

Although the Ordinance was operative on January 1, 2013, its implementation was prevented by an injunction imposed by the Santa Clara County Superior Court. That injunction was overturned by the 6th District Court of Appeal. The ordinance was held to be valid, and the case was appealed to

OVERVIEW

the California Supreme Court. On June 15, 2015, the California Supreme Court issued its decision unanimously affirming the Court of Appeals' determination that the Inclusionary Housing Ordinance is valid.

On September 14, 2015, the California Building Industry Association (CBIA) filed a petition for a writ of certiorari with the U.S. Supreme Court seeking review of the California Supreme Court's unanimous ruling that upheld the City's Ordinance. On February 29, 2016, the Supreme Court declined to hear that petition. At this time, the Housing Department is implementing the Inclusionary Ordinance.

The Inclusionary Ordinance requires the City to establish an in lieu fee on an annual basis. In accordance with the methodology outlined in the Ordinance, the Housing Department has calculated the proposed in-lieu fee for 2017-2018. Therefore, the in lieu fee per each Inclusionary Housing unit shall be \$153,426.

On November 18, 2014, the City Council adopted an ordinance to establish a Housing Impact Fee Program on new market rate rental housing development to address the need for affordable housing associated with such new development. The City Council approved that the operative date of the ordinance be July 1, 2016, preceded by the implementation of an exemption process to minimize the financial impacts on development projects in the pipeline. The proposed grandfathering process exempts pipeline development projects from the new \$17 per square foot Housing Impact Fee if the rental development project

received an entitlement prior to July 1, 2016 and if the project receives its Certificate of Occupancy prior to January 31, 2020. Fees associated with the collection of pipeline project applications and to cover the cost for staff to track compliance and monitoring of exempted projects are recommended in accordance with the plan adopted by City Council. Additionally, the ordinance increases the Housing Impact Fee by 2.4% annually. Therefore, the Housing Impact Fee is proposed to increase from \$17 to \$17.41 per square foot in 2017-2018.

SUMMARY AND IMPACT OF PROPOSED FEE REVISIONS

Existing Fees

Rental Rights And Referral Program - On April 18, 2017, the City Council approved a Tenant Protection Ordinance (TPO), and the 2017-2018 Proposed Budget includes the additional staff to administer the TPO and initiate tasks needed to implement the New Apartment Rent Ordinance. Final approval of the new Apartment Rent Ordinance (ARO) is scheduled for the fall. The cost of the new positions are factored in the proposed fees. Fees for rent-controlled apartments will increase from \$19.29 to \$30.30, and since non-rent controlled apartments are subject to the TPO, those fees are proposed to increase from \$1.98 to \$4.10. Mobilehome fees will not be impacted by the new positions associated with the new ARO and the TPO. An inflation adjustment has been factored into the mobilehome fee bringing it from \$33.48 to \$34.10 per unit.

It is important to note that when staff return to City Council this fall with the final version of the New Apartment Rent

SUMMARY AND IMPACT OF PROPOSED FEE REVISIONS

Existing Fees (Cont'd.)

Ordinance, additional positions will be proposed that are necessary to implement the new ARO. The staffing proposal will be accompanied with proposed changes to the fees charged to rent-controlled and non-rent controlled apartments.

Recommended changes to existing fees pertaining to the management of the City's Multi-Family Affordable Housing Loan Portfolio will align the fees with the cost of delivering the services. In 2017-2018, these fees are being shifted from the Low and Moderate Income Housing Asset Fund to the Multi-Source Housing Fund. The Housing Department is proposing fees at a level to maintain the full cost recovery of these services to its loan portfolio.

For more complicated refinancing scenarios that exceed the base hours, property owners will be assessed an additional per hour rate for both Housing and City Attorney staff time. The proposed \$140 per hour for Housing staff remains unchanged and a decrease from \$205 per hour to \$202 per hour for City Attorney staff are included. The proposed changes reflect the actual costs for the positions that perform these functions. Fees subject this hourly rate change are the Affordable Housing Compliance Plan Fee, Multi-Family Loan Conversion Fee, Multi-Family Loan Origination Fee, Multi-Family Loan Recapitalization Fee, Multi-Family Loan Refinance Fee, Multi-Family Project Owner Transfer Fee,

Family Project Restructuring Fee, and the Supplemental Document Processing Fee.

- Multi-Family Loan Servicing Fee: An increase in the fee (from \$20.65 to \$27.65 per unit) is recommended. This fee recovers the costs associated with the servicing of the City's loans including construction oversight and the annual review of the project's operating budget and audit.
- Multi-Family Affordability Restriction Monitoring Fee: An increase in the fee (from \$20.65 to \$27.65 per unit) is recommended. This fee recovers the costs associated with the monitoring of compliance with the City's affordability restrictions, including the annual review of the developer's tenant's income and rents.
- Homebuyer Subordination Fee An increase in the fee (from \$218 to \$322 per transaction) is recommended.
- Affordable Housing Impact Fee An increase in the fee (from \$17.00 to \$17.41 per square foot) is recommended in accordance with the methodology outlined in Inclusionary Ordinance.
- *Inclusionary In-Lieu Fee*. An increase in the fee (from \$85,572 to \$153,426 per unit) is recommended in accordance with the methodology outlined in Inclusionary Ordinance.

SUMMARY AND IMPACT OF PROPOSED FEE REVISIONS

New Fees

Ellis Act Ordinance:

On April 18, 2017, the City Council approved a local Ellis Act Ordinance. In order to implement the Ellis Act Ordinance, a new fee is recommended in accordance with the plan adopted by the City Council as referenced in the Overview.

- Ellis Act Filing Fee: A fee of \$2,235 per unit, up to 10 units is recommended. Additional units above 10 units would be charged at a rate of \$860 per unit. This fee recovers staff and consultant costs associated with the review of Ellis Act applications. This work includes reviewing the Notice of Intent to Withdraw, relocation issues, and coordinating with both property owners and tenants.

NOTIFICATION

The Housing Department staff met with potential impacted stakeholders and held public hearings at the May 11, 2017 and June 8, 2017 Housing and Community Development Commission meetings. The Proposed Fees and Charges Report was released on May 5, 2017, allowing for a minimum of 10 days for public review. Public input on fee proposals will be heard by the City Council at public hearings held on Tuesday, May 16, 2017 at 1:30 p.m. and Monday, June 12, 2017 at 7:00 p.m. in the Council Chambers.

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		2016-2017		2017-2018	2017-2018 Estimated Revenue			7-2018 Recovery
Service	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
LOW/MOD INCOME HOUSING ASSE Note: Low/Mod Income Housing Asset Fd - Category I fees recommended to be reallocated to Multi-Family Housing - Category I.	ET FD - CATEGORY I							
 Homebuyer Subordination Fee Homebuyer Subordination Fee 	\$218 per transaction		Delete					
Sub-total Homebuyer Subordinati	on Fee	100.0%						
2. Multi-Family Affordability Restriction Monitoring Fee	***		5.1.					
Multi-Family Affordability Restriction Monitoring Fee	\$20.65/unit per year		Delete					
Sub-total Multi-Family Affordabilit	y Restriction Monitoring Fee	100.0%						
3. Multi-Family Loan Conversion								
Fee 1 City Attorney Staff Time	\$205/hr in excess of 89 hours		Delete					
2 City Housing Staff Time	\$140/hr in excess of 183 hours		Delete					
3 Standard Transaction	\$43,865 per transaction		Delete					
Sub-total Multi-Family Loan Conv	ersion Fee	100.0%						
4. Multi-Family Loan Origination Fee								
1 City Attorney Staff Time	\$205/hr in excess of 89 hours		Delete					
2 City Housing Staff Time	\$140/hr in excess of 204 hours		Delete					
3 Standard Transaction	\$46,805 per transaction		Delete					
Sub-total Multi-Family Loan Origin	nation Fee	100.0%						

		2016-2017		2017-2018 Estimated Cost	2017-2018 Estimated Revenue			7-2018 Recovery
Service	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee		Current Fee	Proposed Fee	Current Fee	Proposed Fee
LOW/MOD INCOME HOUSING ASSE 5. Multi-Family Loan Payoff Processing Fee								
1 City Attorney Staff Time	\$205/hr in excess of 3 hours		Delete					
2 City Housing Staff Time	\$140/hr in excess of 24 hours		Delete					
3 Multi-Family Loan Payoff Processing Fee	\$3,975 per transaction		Delete					
Sub-total Multi-Family Loan Payor	ff Processing Fee	100.0%						
6. Multi-Family Loan Recapitalization Fee								
1 City Attorney Staff Time	\$205/hr in excess of 89 hours		Delete					
2 City Housing Staff Time	\$140/hr in excess of 183 hours		Delete					
3 Standard Transaction	\$43,795 per transaction		Delete					
Sub-total Multi-Family Loan Recap	pitalization Fee	100.0%						
7. Multi-Family Loan Refinance Fee								
1 City Attorney Staff Time	\$205/hr in excess of 29 hours		Delete					
2 City Housing Staff Time	\$140/hr in excess of 106 hours		Delete					
3 Standard Transaction	\$20,785 per transaction		Delete					
Sub-total Multi-Family Loan Refin	ance Fee	100.0%						
Multi-Family Loan Servicing Fee Multi-Family Loan Servicing Fee			Delete					
Sub-total Multi-Family Loan Servi	cing Fee	100.0%						

		2016-2017		2017-2018		7-2018 d Revenue		7-2018 Recovery
<u> </u>	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
LOW/MOD INCOME HOUSING ASSE 9. Multi-Family Project Owner Transfer Fee	T FD - CATEGORY I							
City Attorney Staff Time - New Parties	\$205/hr in excess of 29 hours		Delete					
City Attorney Staff Time - Related Parties	\$205/hr in excess of 22 hours		Delete					
City Housing Staff Time - New Parties	\$140/hr in excess of 106 hours		Delete					
City Housing Staff Time - Related Parties	\$140/hr in excess of 82 hours		Delete					
5 Standard Transaction - New Parties	\$20,785 per transaction		Delete					
Standard Transaction - Related Parties	\$15,920 per transaction		Delete					
Sub-total Multi-Family Project Own	ner Transfer Fee	100.0%						
10. Multi-Family Project Restructuring Fee 1 City Attorney Staff Time	\$205/hr in excess of 21 hours		Delete					
2 City Housing Staff Time	\$140/hr in excess of 20 hours		Delete					
3 Standard Transaction	\$7,040 per transaction		Delete					
Sub-total Multi-Family Project Res	tructuring Fee	100.0%						
11. Single-Family Loan Payoff Fee 1 Short Sale Loan Payoff Fee	\$350 per transaction		Delete					
2 Single-Family Loan Payoff Fee	\$210 per transaction		Delete					
Sub-total Single-Family Loan Payo	off Fee	100.0%						

		2016-2017		2017-2018		7-2018 d Revenue		7-2018 Recovery
Service	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
LOW/MOD INCOME HOUSING ASS 12. Supplemental Document Processing Fee	SET FD - CATEGORY I							
1 City Attorney Staff Time	\$205/hr		Delete					
2 City Housing Staff Time	\$140/hr	С	Pelete					
3 County of Santa Clara Clerk Recorder's Office Fees	Actual costs charged by the County Recorder to the City	С	Delete					
Sub-total Supplemental Docume	nt Processing Fee	100.0%						
SUB-TOTAL LOW/MOD INCOME CATEGORY I	HOUSING ASSET FD -	100.0%						
MULTI-FAMILY HOUSING - CATEG Note: Low/Mod Income Housing Asset Fd - Category I fees recommended to be reallocated to Multi-Family Housing - Category I.)							
 Homebuyer Subordination Fee Homebuyer Subordination Fee 		\$	322 per transaction					
Sub-total Homebuyer Subordina	tion Fee			22,540	15,260	22,540	67.7%	100.0%
 Multi-Family Affordable Restriction Monitoring Fee Multi-Family Affordability Restriction Monitoring Fee 		\$	27.65/unit per year					
Sub-total Multi-Family Affordable	e Restriction Monitoring Fee			66,360	4,130	66,360	6.2%	100.0%
3. Multi-Family Loan Conversion								
Fee 1 City Attorney Staff Time		\$	202/hr in excess of 89 hours					
2 City Housing Staff Time			:140/hr in excess of 183					

		2016-2017		2017-2018		7-2018 d Revenue		7-2018 Recovery
	016-2017 opted Fee	% Cost Recovery	% Cost 2017-2018	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
MULTI-FAMILY HOUSING - CATEGORY I 3. Multi-Family Loan Conversion Fee								
3 Standard Transaction		9	643,595 per transaction					
Sub-total Multi-Family Loan Conversion	n Fee			130,785	131,595	130,785	100.6%	100.0%
4. Multi-Family Loan Origination Fee								
1 City Attorney Staff Time		\$	\$202/hr in excess of 89 hours					
2 City Housing Staff Time		,	\$140/hr in excess of 204 nours					
3 Standard Transaction		\$	646,535 per transaction					
Sub-total Multi-Family Loan Origination	n Fee			93,070	93,610	93,070	100.6%	100.0%
5. Multi-Family Loan Payoff								
Processing Fee 1 City Attorney Staff Time		9	S202/hr in excess of 3 hours					
2 City Housing Staff Time		\$	S140/hr in excess of 24 hours					
3 Standard Transaction		\$	3,970 per transaction					
Sub-total Multi-Family Loan Payoff Pro	cessing Fee			247,800	3,975	247,800	1.6%	100.0%
6. Multi-Family Loan Recapitalization Fee								
1 City Attorney Staff Time		\$	\$202/hr in excess of 89 hours					
2 City Housing Staff Time			\$140/hr in excess of 183 nours					
3 Standard Transaction		•	643,570 per transaction					
Sub-total Multi-Family Loan Recapitalize	zation Fee			43,570	43,795	43,570	100.5%	100.0%

		2016-2017		2017-2018		7-2018 d Revenue	2017-2018 % Cost Recovery	
Service ,	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
IULTI-FAMILY HOUSING - CATEGOR\ 7. Multi-Family Loan Refinance Fee	ΥI							
1 City Attorney Staff Time			\$202/hr in excess of 29 hours					
2 City Housing Staff Time			\$140/hr in excess of 106 hours					
3 Standard Transaction			\$20,650 per transaction					
Sub-total Multi-Family Loan Refinance	ce Fee			247,800	249,420	247,800	100.7%	100.0%
8. Multi-Family Loan Servicing Fee 1 Multi-Family Loan Servicing Fee			\$27.65/unit per year					
Sub-total Multi-Family Loan Servicin	ng Fee			66,360	4,130	66,360	6.2%	100.0%
9. Multi-Family Project Owner Transfer Fee 1 City Attorney Staff Time - New Parties			\$202/hr in excess of 29 hour					
City Attorney Staff Time - Related Parties			\$202/hr in excess of 22 hours					
3 City Housing Staff Time - New Parties			\$140/hr in excess of 106 hours					
4 City Housing Staff Time - Related Parties			\$140/hr in excess of 82 hours					
5 Standard Transaction - New Parties			\$20,695 per transaction					
6 Standard Transaction - Related Parties			\$15,870 per transaction					
Sub-total Multi-Family Project Owne	r Transfer Fee			109,695	110,115	109,695	100.4%	100.0%

		2016-2017		2017-2018	2017-2018 Estimated Revenue		2017-2018 % Cost Recovery	
Service	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
MULTI-FAMILY HOUSING - CATEGO 10. Multi-Family Project Restructuring Fee	PRY I							
1 City Attorney Staff Time			\$202/hr in excess of 20 hours					
2 City Housing Staff Time			\$140/hr in excess of 21 hours					
3 Standard Transaction		:	\$6,980 per transaction					
Sub-total Multi-Family Project Res	structuring Fee			6,980	7,040	6,980	100.9%	100.0%
11. Single-Family Loan Payoff Fee 1 Short Sale Loan Payoff Fee		:	\$350 per transaction					
2 Single-Family Loan Payoff Fee			\$210 per transaction					
Sub-total Single-Family Loan Payo	off Fee			11,900	11,900	11,900	100.0%	100.0%
12. Supplemental Document Processing Fee								
1 City Attorney Staff Time			\$202/hr					
2 City Housing Staff Time		;	\$140/hr					
3 Standard Transaction			Actual costs charged by the County Recorder to the City					
Sub-total Supplemental Documen	t Processing Fee			11,870	9,975	11,870	84.0%	100.0%
SUB-TOTAL MULTI-FAMILY HOUS	SING - CATEGORY I			1,058,730	684,945	1,058,730	64.7%	100.0%
MULTI-SOURCE HOUSING FD - CAT 1. Affordable Housing Compliance								
Fee Program 1 City Attorney Staff Time	\$160/hr in excess of 7 hours	:	\$202/hr in excess of 7 hours					
2 Housing Staff Time	\$99/hr in excess of 20 hours		\$140/hr in excess of 20 hours					

Service	2016-2017 Adopted Fee	2016-2017 % Cost Recovery	2017-2018 Proposed Fee	2017-2018 Estimated	Current			
MULTI-SOURCE HOUSING FD - CATE	EGORY I		Proposed ree	Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
Affordable Housing Compliance Fee Program								
3 Standard Application	\$3,200 per application	100.0%	No Change					
Sub-total Affordable Housing Comp	pliance Fee Program	100.0%						
2. Affordable Housing Impact Fee								
Program 1 Affordable Housing Impact Fee	\$17/sf		\$17.41/sf	1,500,000		1,500,000		100.0%
Sub-total Affordable Housing Impa	ct Fee Program			1,500,000		1,500,000		100.0%
3. Housing Impact Fee Program - Pipeline Annual Fee								
1 City Attorney Staff Time	\$160/hr in excess of 2 hours		No Change					
2 City Housing Staff Time	\$100/hr in excess of 13 hours		No Change					
3 Standard Transaction	\$1,740 per transaction	78.0%	No Change					
Sub-total Housing Impact Fee Prog	gram - Pipeline Annual Fee	78.0%						
Inclusionary In-Lieu Fee Inclusionary In-Lieu Fee	\$85,572/unit		\$153,426/unit					
Sub-total Inclusionary In-Lieu Fee								
5. Rental Rights and Referrals Program								
1 Apartment Unit	\$19.29 annually	98.7%	\$30.30 annually	1,345,321	564,575	1,344,078	42.0%	99.9%
2 Ellis Act Filing Fees - additional per unit over 10 units			\$860 additional per unit over 10 units					
3 Ellis Act Filing Fees - per unit up to 10 units			\$2,235 per unit up to 10 units					
4 Mobile Home Unit	\$33.48 annually	99.3%	\$34.10 annually	365,193	357,271	364,427	97.8%	99.8%

		2016-2017	2017-2018	2017-2018 Estimated Revenue		2017-2018 % Cost Recovery		
Service	2016-2017 Adopted Fee	% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
MULTI-SOURCE HOUSING FD - CAT 5. Rental Rights and Referrals Program 5 Non-Rent-Controlled Apartment		100.0%	\$4.10 annually	196,710	92,497	195,554	47.0%	99.4%
Units Sub-total Rental Rights and Referr	als Program	99.0%		1,907,224	1,014,343	1,904,059	53.2%	99.8%
SUB-TOTAL MULTI-SOURCE HOU		96.2%		3,407,224	1,014,343	3,404,059	29.8%	99.9%
MULTI-SOURCE HOUSING FD - CAT 1. Inclusionary Fees 1 For-Sale - High Rise Not in Downtown Core 2 For-Sale - High Rise in Downtown High-Rise Incentive Area	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$200,200 \$8.50 per square foot of total living space in entire development. Maximum per		No Change					
3 For-Sale - Low-Rise Condominium/Stacked Flat Units	affordable unit: \$65,000 \$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$90,000		No Change					
4 For-Sale - Single-Family Detached Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$200,000		No Change					
5 For-Sale - Townhouse/Row- House Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$120,000		No Change					

	2016-2017 Adopted Fee	2016-2017		2017-2018		7-2018 d Revenue		7-2018 Recovery
Service		% Cost Recovery	2017-2018 Proposed Fee	Estimated Cost	Current Fee	Proposed Fee	Current Fee	Proposed Fee
MULTI-SOURCE HOUSING FD - CAT	EGORY II							
1. Inclusionary Fees								
6 Rental Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$85,500	N	o Change					
2. Rental Mediation Penalty: Apartments								
1 30 days past due = 25% of principal	Penalties and interest assessed for delinquent permit payment	N	o Change					
2 60 days past due = 50% of principal	Penalties and interest assessed for delinquent permit payment	N	o Change					
3. Rental Mediation Penalty: Mobile Homes								
1 30 days past due = 10% of the amount of the fee	Penalties and interest assessed for delinquent permit payment	N	o Change					
SUB-TOTAL MULTI-SOURCE HOU	SING FD - CATEGORY II							
TOTAL DEPARTMENT - NON-GEN	ERAL FUND			4,465,954	1,699,288	4,462,789	38.0%	99.9%
TOTAL DEPARTMENT - Category	I			4,465,954	1,699,288	4,462,789	38.0%	99.9%
TOTAL DEPARTMENT - Category	II							
TOTAL DEPARTMENT				4,465,954	1,699,288	4,462,789	38.0%	99.9%