

Waterford Cable Commission
AGENDA
6:30 pm, Tuesday, October 16, 2018
Town Hall, 3rd Floor Conference Room

1. Approval of agenda
2. Approval of minutes
3. Correspondence and bills
4. Signal quality
5. Subscriber complaints
6. Report from Media Network
7. Report from Cable Coordinator
8. Comments
9. Adjourn



Waterford Township Cable Commission

Minutes of the Tuesday, September 18, 2018, Meeting

Members Present: Al Pavlish, Kathy Hepler, Laura Petrusha, Ken Fuerst, Howard Heitzeg, Bob Piggott, Gary Allison (Cable Coordinator)

Absent: Steven Thomas

Guests: Josh Bowren, Dave Weyhing

The meeting was called to order by Chairperson Laura Petrusha at 6:31 p.m.

Roll Call.

Agenda - The motion to approve the agenda for, September 18, 2018 was made by Bob Piggott and supported by Ken Fuerst. Approved unanimously.

Minutes - The motion to approve the minutes from August 21, 2018 was made by Kathy Hepler and supported by Ken Fuerst. Approved unanimously.

Correspondence and Bills – Nothing to report.

Signal Quality – No reported problems.

Subscriber Complaints – No outstanding complaints.

Media Network Report – Josh Bowren reviewed the Media Network report. Following discussion, report was filed.

Cable Coordinator's Report – Gary Allison reviewed the Cable Coordinator Report. Commission discussed budget line items. Following discussion, report was filed.

Adjournment – The motion to adjourn was made by Howard Heitzeg and supported by Bob Piggott. The motion was unanimously approved, and the meeting adjourned at 7:49 p.m.

Respectfully submitted,

Bob Piggott, Secretary

Media Network of Waterford

Organization Monthly Report – October 2018

No issues with Comcast, Radio, Internet or ATT

Live 365 has been implemented in to our Radio Broadcast system. We are very happy with it so far. The cost is \$79 a month and covers a turnkey solution with copyright clearance, streaming, hosting and storage. Staff is still working on switching to live broadcast workflow.

Staff is working to bring to life the opportunity of using pre-wired fiber optics between the Media Network control room and the football stadium. Wiring was installed quite a while ago, but equipment and infrastructure has to be developed.

Waterford Coalition for youth has finished principle photography on all the Project Spotlight PSA's. Staff is now working to finish all the PSA's in to a 27 min presentation package that will be used during a Town Hall type gathering for parents to be held in the near future. One of the PSA's will be presented at the WSD Board meeting this Thursday. The title of the project was, "You think you know but you don't"

We are considering purchasing a full frame HD camera for staff. We are actually running out of cameras on the weekends due to popularity. The new camera we are looking in to has many features such as an HDSDI connection for compatibility for truck shoots and a night vision mode for a new Ghost Hunters TV show being produced by Staff.

Mott kids back filming the morning news announcements. They are shooting morning announcements every

Leightronix is still having internal errors. Reverting our schedules back to old schedules.

We are purchasing a mobile Hot spot for the Mobile Truck and Live Radio broadcasting.

We have purchased new set furniture for the studio. These new set pieces are sharp and well received by residents.

Media Network covered Waterford Mott Homecoming Game 2018. The game is already on the channel and on demand.

Staff produced a show at Rotten Manor in Holly, MI. This was a multi-platform shoot serving several different shows that currently air on the channel, such as, "In Town" and "Death, dying and eternity" Rotten Manor is a popular haunted house attraction.

Staff is scheduled to produce Phantom Feast at the Michigan Renaissance Festival. This is a dinner and live action theater program.

Staff member Casetti conducted a job shadow day with a student from Mott Community College. Student is legally blind and enrolled in their video/radio program. Media Network was approached by Mott Community to follow with a job coach placement program they have in place.

Our Senior Department has started a new program called, "Hello Waterford". Crew is still in pre-production. First half of show will be upcoming events and the second part of the show will highlight local organizations hosted by Alison from Parks and Rec and Erin from the Waterford Senior Center.

Media Network is looking at starting a Radio Club that will span across Residents and both Waterford Mott and Waterford Kettering High Schools. We are looking to help offsite Waterford Kettering produce content for the radio station and send us the audio files to be broadcast on our platform. The radio club will focus on learning radio only outreach concepts.

Staff assisted Oakland County Sportsman club on a new program highlight their field and hunter archery program.

Seniors videotaped and produced the "Walk and Roll for Meals" program.

Volunteer Jim Powers is starting a third program called, "The Road Show"

Staff videotaped as an in-kind donation to the Waterford Chamber Infused 365 Conference featuring speaker John Fikany. This program did not air on TV and was supplied to John as a payment for speaking to the group.

Waterford Mott donated Walkie Talkies to the Media Network. They are actually pretty high quality and will be an asset to the Media Network. Waterford Mott had no further use for them.

Media Network purchased an ad in the Leisure Service Catalog. We had a half page ad that was discounted half off. This ad turned out great and has generated interest already.

Staff produced the 15min Oakland Country Holiday Extravaganza PSA to promote this year's parade. This was a slightly overwhelming project as the parade Committee had many reservations about what was shown in the PSA and what was not. Staff does plan on covering the parade LIVE on Facebook in December.

Staff member McLeod is currently producing a fresh PSA promoting our Free Production Classes and Workshops. She will also produce a similar PSA promoting our Radio Classes and Workshops.

Township of Waterford

Cable Coordinator Report Oct 2018

Submitted by Gary Allison

- Planning Commission Meeting broadcast.
- Township Board meeting recorded, but not broadcasted live.
 - Our live broadcast feed was still down for the 10/9 Trustee meeting.
 - I met with our Township IT department to discuss the time it was taking to rectify the problem. IT, along with the Waterford School District IT department, soon discovered the problem and fixed it. As of 10/11, we are able to broadcast live.
- Met with the Township Supervisor and his administrator to preview the CGI shot list and prioritize the list for efficiency.
- Cable Coordinator was the special guest speaker at the Oakland County Association of Township Supervisors luncheon.
 - Topic – Right of Way, telecommunications, current legislation and FCC rulings.
- SB 637
 - The bill regarding wireless use of right of ways passed the energy committee and is before the Michigan house and senate.
 - Efforts to fight the bill are still underway via the cable coordinator office and the township board.
 - Attached is the summary of the bill.

Productions

Planning Commission Meeting

Summary of Proposed Small Cell Wireless Communications Facilities Deployment Act (the "Act") (Substitute S-2 For Senate Bill 637)

History and Status

SB 637 was originally introduced on October 19, 2017. Modifications to the original bill were made during senate committee hearings that were sufficient for MML and MTA to take a neutral position. The S-2 substitute for SB 637 cleared the state senate on March 15, 2018, by a 33-3 vote, and has been referred to the house committee on energy policy.

It is a reasonable expectation that SB 637 will become law despite continuing opposition by Protec and other municipal interests. Although the effective date of SB 637 passed by the senate was 90 days after enactment, immediate effectiveness remains a possibility.

General Restrictions and Limitations on Municipal ROW Authority Under SB 637

If SB 637 becomes law, it will severely limit municipal right-of-way authority, arguably eliminating the proprietary/ownership authority (requiring franchises or licenses) the FCC left intact with its wireless facilities rules several years ago.

SB 637 also limits municipal authority to regulate ROW installations outside the zoning ordinance, at least with respect to height. The 2012 amendment of the MZEA that added MCL 125.3514, made wireless communication facility collocations a permitted use and imposed shot clocks for purposes of zoning ordinances. The thinking, shared by Mike Watzka and reflected in ordinances prepared for our clients, was to remove right-of-way regulations of wireless from the zoning ordinance. That strategy will need to be rethought/refined.

Highlighting in this summary is of provisions dealing with fees, rates, shot clocks, and what municipalities would still be allowed to do under the Act, or by adopting standards or requirements for certain matters by Ordinance or otherwise.

Overview of the Act

The Act consists of odd-numbered sections 1 through 39, spread over 36 pages, with its title and purposes in Section 1, definitions in Sections 3, 5, 7, and 9, and key preemption provision as stated in Section 11(1), which applies anywhere in a municipality, not just ROW, and reads as follows:

Except as provided in this Act, an authority shall not prohibit, regulate, or charge for the collocation of small cell wireless facilities.

In the context of the Act and this preemption language, an **"authority"** is basically any governmental entity, with **"collocation"** being to install, mount, maintain, modify, operate, or replace wireless facilities on or adjacent to a utility pole or other support structure. Collocation does not include installation of new utility poles or support structures. This summary uses municipality instead of authority.

Small cell wireless facilities (SCWF), which is the obvious focus of the Act, is defined as equipment at a fixed location that enables wireless services between a user and communication network that meets both of two requirements: (1) each antenna is no more than 6 cubic feet in volume, and (2) all other equipment (with certain exceptions) is not more than 25 cubic feet in volume.

Sections 13 and 15 apply to the deployment of SCWF and associated utility poles in the public ROW by a wireless provider, with **public ROW defined** as the area on, below, or above a public roadway, highway, street, alley, bridge, sidewalk, or utility easement dedicated for compatible uses, and **wireless provider defined** as including actual providers of wireless services and persons/entities that build or install facilities for use by service providers.

Section 17 deals with zoning reviews and approvals, with Section 19 addressing collocation of SCWF on municipal (authority poles) in a manner that requires it to be allowed!

Sections 21 - 25 apply to municipally owned electric utilities (probably not applicable to our clients), with Section 27 giving the circuit court jurisdiction to determine disputes and hear appeals.

Sections 29 - 33 allow municipalities to require hold harmless/indemnification, insurance, and bonds, and to charge less than what the Act allows for fees and rates.

Sections 35, 37, and 39 provide for facilities to be labeled, electricity used to be paid for by the wireless provider, and that the Act does not apply to MPSC regulated utilities.

Section 13, consisting of subsections (1) - (10)

(1) section applies to deployment of SCWF and associated new or modified utility poles in ROW.

(2) prohibits exclusive arrangements by municipalities for use of ROW.

(3) **limits the annual rate per pole that may be charged** by an authority to \$20 for existing poles/structures and \$125 for poles/structures erected after the effective date of the Act, with a 10% escalator every five years.

(4) requires rates different than in the Act to be revised to comply within 90 days of the effective date of the Act, with one exception. Rates set by ordinance or agreement are allowed to continue for SCWF installed and operational before the effective date of the Act.

(5) actually goes beyond the preemption language in Section 11(1), when it comes to what a wireless provider may do, which is:

Collocate small cell wireless facilities and construct, maintain, modify, operate, or replace utility poles in, along, across, upon, and under the ROW. (emphasis added.)”

On the face of the quoted language and under the definition of utility pole, a wireless provider would be entitled to install a new 40' utility pole that was merely designed to support SCWF as opposed to being for a specific proposed collocation of SCWF, i.e. a speculative installation, "if you build it they will come!"

(5) also recognizes that municipal approval may still be required and mandates that construction and maintenance of SCWF and utility poles not obstruct or hinder usual travel, public safety, or legal use of the ROW by other users and utilities.

After the effective date of the Act, new or modified utility poles in the ROW are not to exceed 40 feet above ground level and SCWFs are not to extend more than 5 feet above utility poles or structures they are collocated on unless the municipality agrees otherwise.

(6) allows a wireless provider to collocate a SCWF or install, construct, maintain, modify, operate, or replace a utility pole that exceeds the height limits under subsection (5), subject to zoning regulations and zoning reviews under Section 17. With Section 17 not containing any height limits, zoning regulations appear to be the only place to put height limitations, forcing municipalities to, in effect, abandon the concept of regulating installations in the ROW completely outside the zoning ordinance.

(7) allows and requires wireless provider compliance with nondiscriminatory municipal prohibitions on installation of aboveground structures in an ROW area designated solely for underground or buried cable and utility facilities if: (a) the prohibition has been complied with in the area by all cable and utility facilities for at least 90 days before the wireless provider's application; and (b) the municipality does not prohibit the replacement of utility poles it owns and operates by the wireless provider; and (c) waiver of the underground requirements are allowed and applied in a nondiscriminatory manner.

(8) allows municipalities to adopt written, objective requirements for reasonable, technically-feasible, nondiscriminatory, and technologically-neutral design or concealment measures in historic district, downtown district and residential zoning districts, provided such requirements may not have the effect of prohibiting the wireless provider's technology, with required concealment measures excluded from determining if the size restrictions on an SWCF (6/25 cubic feet) are met.

(9) requires municipal administration and regulation of wireless provider activities to be reasonable, nondiscriminatory, competitively neutral, and in compliance with applicable law.

(10) allows municipalities to require a wireless provider to repair all damage it directly causes to the ROW and return it to a pre-damaged functional equivalent, and allows the municipality to make the repairs and charge the wireless provider the reasonable, documented cost of same if the provider fails to make the repairs within 60 days of written notice.

Section 15 consisting of subsections (1) - (8)

(1) Section applies to activities of wireless providers in the ROW.

(2) confirms that municipalities may require permits for collocating SCWFs or to install, modify, or replace utility poles on which an SCWF will be collocated. The processing of an application for such a permit is subject to numerous provisions spelled out in subsections (2)(a)-(o) and summarized as follows:

- (a) Municipality cannot require wireless provider to perform services unrelated to collocation applied for.
- (b) Limits the application information and documentation that may be required to an FCC certificate of compliance and as related to criteria in subsection 2(i).
- (c) Municipality may require proof of other necessary permits, applications, or easements.
- (d) 25 days allowed for notifying applicant in writing if application is complete, which tolls the shot clock under (h). This is longer than the 14-day period for completeness notices under MCL 125.3514(5).
- (e) Addresses supplemental submissions and municipal responses to them.
- (f) Municipality may require wireless provider to attest that the SCWF will be operational by a wireless service provider within one year of permit issuance.
- (g) Applications to be processed on a nondiscriminatory basis.
- (h) **Shot clocks** for municipality to approve or deny applications and notify applicant in writing as follows:

- (1) 60 days for collocations with possible 15-day extensions;
- (2) 90 days for new or replacement utility poles not exceeding 40 feet above ground level and associated SCWF with possible 15-day adjustments.

MUNICIPAL FAILURE TO COMPLY WITH TIME DEADLINES RESULTS IN THE COMPLETED **APPLICATION BEING CONSIDERED APPROVED** SUBJECT ONLY TO THE REQUIREMENT THAT THE APPLICANT PROVIDE THE MUNICIPALITY AT LEAST 7 DAYS ADVANCED WRITTEN NOTICE PROCEEDING WITH THE WORK.

- (i) **Specifies the only 9 reasons a municipality may deny an application for collocation of an SCWF or installation, modification, or replacement of a utility pole that does not exceed 40 feet in height above ground level, as follows:**
 - (1) Material interference with safe operation of traffic control equipment.
 - (2) Material interference with sight lines or clear zones for transportation or pedestrians.
 - (3) Material interference with ADA compliance (or similar governmental standards regarding pedestrian access/movement).
 - (4) Material interference with maintenance or full unobstructed use of public utility infrastructure.
 - (5) Material interference with, or location too close to, drainage infrastructure.
 - (6) Noncompliance with **reasonable, nondiscriminatory written spacing requirements adopted by ordinance or otherwise for location of ground-mounted equipment and new utility poles**, provided those requirements do not prevent a wireless provider from serving any location.
 - (7) Failure to comply with applicable codes, which as defined in Section 3 of the Act are limited to uniform building, fire, electrical, plumbing, or mechanical codes adopted under the State Construction Code Act, by the Federal OSHA, or a state or national code organization.

- (8) Fail to comply with enforceable underground placement or concealment measures under Section 13(7) or (8).
- (9) Failure to meet reasonable, objective stealth or concealment criteria for SCWFs that apply in an historic district or other designated area if specified in writing in an ordinance or otherwise and applied in a nondiscriminatory manner to all occupants of the ROW.
- (j) Requires denials of permit applications to be in writing with reasons and allows applicants to cure deficiencies within 30 days without paying additional application fees.
- (k) Collocation of up to 20 SCWFs may be consolidated in a single application for substantially similar equipment and poles or support structures, with municipality allowed to act on proposed facilities in a consolidated application separately.
- (l) Requires the collocation of an SCWF to be completed and operational within one year of permit issuance, with the permit void if that does not occur. Void permits may be reapplied for and permit holders may request permit termination.
- (m) Approval of a permit application authorizes the installation or collocation and maintenance of the allowed facilities, utility poles or support structures for so long as the site is in use and in compliance with the initial permit.
- (n) Prohibits municipal moratoriums.
- (o) Allows municipality and permit applicants to extend time periods by mutual agreement.

(3) caps permit application fees at \$200 for each SCWF alone and \$300 for each SCWF and new utility pole to which it will be attached, with those fees to be increased by 10% every five years.

(4) allows municipalities to revoke permits on 30 days' notice and opportunity to cure for failure to meet requirements in Section 15(2)(i).

(5) states that municipalities may not require permits, other approvals, fees or rates for:

- (a) Replacement of an SCWF with one that is not larger or heavier and that complies with applicable codes.
- (b) Routine maintenance of an SCWF, utility pole or wireless support structure.
- (c) Micro-wireless facilities (no more than 24" long, 15" wide, and 12" high with exterior antenna no more than 11" long) suspended on cables strung between utility poles or wireless support structures in compliance with applicable codes.

(6) states municipalities receiving applications for new utility poles may propose an alternate location in the ROW or on municipal property within 75 feet of proposed location. Applicant only required to use alternate location if it determines it has a right to do so on reasonable terms and conditions and the alternate location does not impose unreasonable technical limits or significant additional costs.

(7) requires written notice of intention to discontinue use of an SCWF, utility pole, or wireless support structure by wireless provider to municipality, specifying when and how the wireless provider intends to remove the facility, pole, or structure. Municipality may impose reasonable and nondiscriminatory requirements for property restoration, and if removal not completed

within 45 days after discontinuance of use, may complete removal and assess its costs against the wireless provider. A permit for an SCWF expires upon its removal.

(8) states municipalities may require a permit for work that will unreasonably affect traffic patterns or obstruct vehicle or pedestrian traffic in the ROW.

Section 17 consisting of subsections (1) - (7) addresses zoning reviews/approvals.

(1) confirms that activities in Section 15(5) and permitted uses under Section 13(5) are exempt from zoning review. If not exempt, the zoning review and approval of the following activities in or outside the ROW are provided in subsections (2), (3), and (4):

- (a) Modification of existing or installation of new SCWFs.
- (b) Modification or existing or installation of new wireless support structures (does not include utility poles) used for SCWFs.

(2) in subsections (a)-(e), specifies requirements for processing zoning approval applications.

- (a) Requires notice to applicant within 30 days of application on whether it is complete and, if not, what is missing, with tolling of the 30-day review period once the notice is issued.
- (b) Provides for supplemental submissions, timetables for review, and additional tolling of 30-day review period.
- (c) Applications to be processed on a nondiscriminatory basis.
- (d) **90-day shot clock** to approve or deny and provide written notice to applicant on applications for modification of wireless support structures or installation of an SCWF, **and 150 days for a new** wireless support structure, with the applicant and municipality able to extend those time periods. Municipal failure to comply with shot clocks results in **application considered to be approved** subject only to the condition that the applicant provide at least 15 days' written notice before work proceeds.
- (e) Municipality may only deny an application if it is supported by substantial evidence in a contemporaneously, publicly-released, written record, there is a reasonable basis for the denial, and the denial would not discriminate against the applicant with respect to the placement of other wireless providers' facilities.

(3) municipal zoning review of an application is subject to requirements specified in subsections (a)-(d), which are:

- (a) Except for height, an applicant's business decision on type and location of SCWF, wireless support structure and technology used are presumed to be reasonable. In considering height of structures, the municipality shall not discriminate between the applicant and other communications service providers.
- (b) Municipality may not evaluate or require information about applicant business decisions regarding the need for a proposed wireless support structure or SCWF, the applicant's service, including the customer demand for and quality of that service.

- (c) Requirements regarding appearance of facility, including materials used and the arranging, screening or landscaping to be reasonable.
- (d) Spacing, setback and fall zone requirements to be substantially similar to such requirements imposed on other commercial structures of similar height.

(4) application fees for zoning approvals capped at \$1,000 for new and modified wireless support structures and \$500 for new and modified SCWFs.

(5) commencement of construction required within one year of zoning approval. If not, approval is void, but wireless provider may reapply, and providers may voluntarily request zoning approval be terminated.

(6) prohibits municipal moratoriums.

(7) allows municipal revocation of zoning approvals on 30 days' written notice and opportunity to cure for failure to meet requirements of approval for applicable codes or zoning requirements.

Section 19 consisting of subsections (1) - (5) addresses collocation on authority poles, defined as utility poles owned or operated by a municipality.

(1) prohibits municipalities entering into exclusive arrangements for attachment to authority poles and provides that anyone who purchases, controls or acquires an authority pole is subject to the requirements of Section 19.

(2) collocation rates for authority poles are to be nondiscriminatory regardless of services provided, are not to exceed \$30 per year per pole, are to be increased by 10% every five years, and are in addition to rates charged for use of the ROW under Section 13.

(3) requires rates different than in the Act to be revised to comply within 90 days of the effective date of the Act, with one exception. Rates set by ordinance or agreement are allowed to continue for SCWF installed and operational before the effective date of the Act.

(4) within 90 days of receiving its first request to collocate an SCWF on an authority pole, the municipality must make available, through ordinance or otherwise, its rates, fees and terms for allowing the collocation, which must comply with all of the following:

- (a) Be nondiscriminatory, competitively neutral, commercially reasonable, and comply with the Act.
- (b) Comply with the provisions of the Act regarding "make-ready work," defined as the work necessary to enable an authority pole to support collocation, which may include modification or replacement of the pole or lines. Specifically, the municipality is to provide a good faith estimate for the make-ready work within 60 days of receiving a complete application, with that work to be completed within 60 days of the applicant's written acceptance of the estimate. A municipality may not require more make-ready work than required to comply with law or industry standards, and the fees for that work are not to include costs related to pre-existing or prior damage or noncompliance, unreasonable

consultant fees or expenses, or to exceed actual costs imposed on a nondiscriminatory basis.

(5) recognizes that a municipality is not required to install or maintain authority poles, or a specific authority pole, in any location if the municipality makes a nondiscriminatory decision to eliminate aboveground poles of a particular type generally in a designated area. Also includes specific provisions for collocated SCWFs on authority poles in areas where aboveground poles are being eliminated.

Sections 21, 23 and 25 deal with collocations on “non-authority poles” of a “municipally-owned electric utility.”

Although our clients that own control light poles could arguably be considered a municipally-owned electric utility (defined as a system owned by one or more municipalities to furnish power or light), the definition of non-authority pole is a utility pole used for electric delivery service (an undefined term) and controlled by the governing body of a municipally-owned electric utility. If the only electricity going to a city light pole is to power the light, and there are no other electric delivery service lines attached, I believe it is safe to treat these sections as not applicable to our clients.

Section 25 provides that municipalities do not have jurisdiction over SCWFs inside a structure, on a campus of an institution of higher education and its stadiums or athletic facilities, or a professional stadium or athletic facility, other than to enforce applicable codes.

Section 27 provides the circuit court where the municipality is located with jurisdiction to determine all disputes arising under the Act, recognizes an applicant’s right to appeal an adverse municipal decision to the circuit court, or at its discretion to appeal such a decision to the municipality if it has an appeal process to render an expeditious decision.

Section 29 allows a municipality as part of the permit process under Section 15 to require a wireless provider to do the following with respect to an SCWF, wireless support structure or utility pole:

- (a) Defend, indemnify, and hold the municipality harmless from claims, etc., from wireless facilities, structures or poles to the extent caused by the applicant and not solely caused by the sole negligence of the municipality.
- (b) Obtain insurance naming the municipality as an additional insured, with the municipality to specify the types or amounts, and self-insurance allowed.

Section 31 allows a municipality to establish lower fees or rates than the maximum specified in the Act.

Section 33 consists of subsections (1) - (2)

(1) allows municipal bonding requirements as conditions of permits for SCWFs if similar requirements are imposed in connection with permits for similar ROW users and the purpose of the bonds is to provide for removal of facilities, repair the ROW, or recoup rates or fees delinquent by more than 12 months (but only if a 60-day advance notice has been given.)

(2) prohibits municipalities from requiring a cash bonds unless there has been a default on a surety bond, and from requiring a bond for more than \$1,000 per SCWF.

Section 35 requires labeling of each SCWF with the wireless provider's name, emergency contact phone number, and identification of SCWF and its location.

Section 37 provides that the wireless provider is responsible to arrange for and pay for electricity used to operate an SCWF.

Section 39 provides that the Act does not affect: (i) facilities of investor-owned utilities whose rates are regulated by the MPSC, and/or other designated entities, or (ii) the rights, controls, or contractual obligations of such investor-owned utilities, and provides that the MPSC has sole jurisdiction over attachment of wireless facilities on poles and other equipment of such investor-owned utilities.