but had not dictated what decision, and Court had ordered EPA to make a decision, only a proposal for comment. The proposal was not a final decision, but had not dictated what decision, and

In October 2015, EPA in response to a Court order to make a decision on Chlorpyrifos (CHP) or also know as Lorsban and Dursban. None of these events are final regulatory actions and have no impact on existing uses of CHP products. These events are potentially precedent-setting and in addition to any impact on CHP, could impact future regulation of all ag products.

At the Federal Level

In December of 2014, EPA issued a Revised Human Health Assessment for CHP. In the assessment, EPA increased the Food Quality Protection Act (FQPA) Safety Factor from 1X to the full FQPA 10X Safety Factor and for the first time, included in the occupational risk assessment for women who were or could become pregnant. Also, EPA put aside extensive real-world water monitoring data and relied on screening level modeling to claim almost all uses posed a risk to drinking water. Dow AgroSciences (DAS) and ag stakeholders challenged the science.

In October 2015, EPA in response to a Court order to make a decision on an activist petition filed in 2007, released a proposal to revoke all CHP tolerances for public comment. This was not a final decision, only a proposal for comment. The Court had ordered EPA to make a decision, but had not dictated what decision, and

EPA chose to again rely on the unrealistic drinking water modeling estimates as the basis for the proposal. Strong support for the need and value of CHP was provided by growers, commodity organizations, and academics. Earlier this year, DAS submitted a refined drinking water assessments showing there remain only a few areas of concern, and further refinement would reduce those areas even further. The original date for a final decision by EPA was December 31, 2016, but after requests from both EPA and grower organizations arguing EPA needed more time, the Court granted a delay until March 31, 2017 for the decision.

EPA convened a Scientific Advisory Panel (SAP) in April 2016, in a move that would reverse four decades of established risk assessment regulatory process, to consider a several thousand-fold reduction in the recognized regulatory health endpoint for CHP. EPA was basing the proposal on a single, unreplicated epidemiology study ("Columbia" study) for which the researchers have continually refused to provide EPA with all the underlying data. Ag stakeholders again joined with DAS to raise challenges to this approach. The SAP strongly rejected the EPA proposal and in a major victory for a fair and transparent regulatory process, the Panel’s report stated “Data used for decision-making should be justifiable, and, therefore undergo rigorous review, verification and replications”.

EPA also issued the draft Endangered Species Assessment for the three Organophosphates (CHP, Malathion, and Diazinon) in 2016. The assessment was seriously flawed and unrealistically overestimated risk, resulting in projections that almost all endangered species and all their habitats are adversely affected. Again, a strong challenge to the EPA process was provided by ag stakeholders and DAS. The process EPA proposed for these assessments was shown to be flawed and unworkable and a threat to continued use of all ag products. The EPA will now continue to work towards a December 2017 target for the final ESA BiOps.

What is next on the horizon this year? EPA has indicated they will issue a new assessment, called a Notice of Data

Continued on page 2.

Develop Your Leadership Skills Through NAICC

The NAICC Leadership Program’s (NAICCLP) purpose is to help ensure agricultural sustainability by facilitating the growth of new leaders within NAICC and the crop consulting, research consulting and quality assurance professions. This exciting program consists of three modules that begin in January at the NAICC Annual Meeting, followed by a trip to Washington, DC with the Executive Board and attending the Crawfish Boil on the Hill. The program continues through the summer/fall with visits to other NAICC member’s facilities with participates “graduating” at the following annual meeting.

Applicants must be a member in good standing of NAICC. Up to four applicants will be selected for the leadership class with consideration given to geographic location and the person’s area of knowledge/ expertise. Find the complete details on the program including participant responsibilities, criteria for selection/ participation, and the application form at http://naicc.org/national-alliance-of-independent-crop-consultants-leadership-program/. Deadline is November 15.

Two ways to participate:

• Complete application and return by November 1
• Host a participant at your facility and/or donate to the Leadership Scholarship Fund
President’s Column
Continued from page 1.

Availability, sometime this year with a proposed decision on the proposal to revoke tolerances. No date has been given, but we can expect it in early November. This will not be a final decision and another public comment period will be offered. This assessment will include actions EPA proposes based on the SAP and also additional, but likely still screening level drinking water assessments, along with new occupational and dietary assessments. This will be a crucial time for EPA to hear the critical need for continued availability of CHP and the need for a fair, scientifically-credible, and transparent regulatory process for regulating ag products.

According to sources at Dow AgroSciences, “We remain confident that authorized uses of CHP products, as directed, offer wide margins of protection for human health and safety and that all current CHP crop tolerance issues can be resolved. Thus, it is DAS’ estimation that CHP products will continue to be utilized and sold under the existing label and tolerances through at least 2017.”

Support the FEEAE while shopping on Amazon

Do you shop on Amazon.com? Now you can support the Foundation for Environmental Agricultural Education (FEEAE) while shopping and Amazon makes the donation. There is no additional cost to you! The FEEAE supports the education goals and activities of NAICC by providing financial assistance for quality educational sessions for independent crop, research and QA consultants by sponsoring the annual Richard L. Jensen Memorial speaker at the Annual Meeting, and by providing scholarship endowments to students pursuing careers in agriculture, to name a few. When you shop at smile.amazon.com, you’ll find the exact same low prices, vast selection and convenient shopping experience as Amazon.com, with the added bonus that Amazon will donate a portion of the purchase price to the FEEAE. You can also continue to use your Amazon Prime account.

To sign up, go to “smile.amazon.com”:

Under “Select a charity”, choose “Or pick your own charitable organization” and type in “Foundation for Environmental Agriculture Education”. Please note that the FEEAE name is listed as “Agriculture” in Amazon Smile, rather than the correct “Agricultural”.

Choose the Select button for Foundation for Environmental Agriculture Education:

Then check the box for “Yes, I understand that I must always start at smile.amazon.com to support FEEAE”:

Then you can start shopping and a portion of what you purchase will go to support the FEEAE. There is no additional charge to you for your purchase, and free shipping benefits still apply. Remember, you must go to smile.amazon.com to shop in order for charitable contributions to be made to the FEEAE by Amazon.
QA Corner:

Quality Assurance is Your Greatest Ally

By Torrance Lee
Quality Assurance Specialist
Valent U.S.A. Corporation

In an increasingly competitive world, what can separate you from the competition maybe the individual who audits your data. That friendly quality assurance auditor helps you gain that competitive advantage by elevating the level of your game by improving the integrity of the data and enhancing the quality of the samples.

From a Sponsor perspective, there is nothing more frustrating than poor documentation or non-commercial or tainted samples. A good quality assurance unit can help ensure that the quality issues are minimized or mitigated by making you aware of any problems. While it may be costly and impractical to have every critical phase audited, it may be a good idea to have them audit the first application or an early sampling event. It may also be a good idea to audit the data after each phase of the study rather than waiting until the end. Procrastination never pays off! Getting a handle on the problem early can save much grief and effort.

Having a qualified Quality Assurance person that challenges you and keeps you on your toes is like having a coach that helps you realize your potential. Like a coach, they can teach and identify problems. But it is up to you, the pupil, to listen, learn, and implement. As such, do not take findings as a negative challenge to your hard work, but rather as feedback on how to be better. While some of our suggestions may miss the mark, and sometimes our assessment may not be entirely accurate, yet it is our duty to bring attention to issues that could affect the integrity of the study. This duty requires us to speak the truth, without judgment, so that we may shine the light on potential issues. Yet it remains the Principal Investigator’s and the Study Director’s responsibility to carefully consider each finding seriously and objectively, and to take action whenever needed. Although you may disagree, do not personalize or dismiss the findings. At the end of the day, we are on the same team and each member of the team deserves respect and dignity.

Just as coaching goes beyond box checking and dotting all the “i’s”, an important element of coaching is to teach the fundamentals and reinforce good habits. Good habits and sound fundamentals are also essential for a successful and compliant GLP program. Therefore, it is important to listen to what the Quality Assurance person has to say. Implement what they say in your daily routine and follow their suggestions. Other examples may include pre-planning the application, double checking all critical numbers, and documenting all unforeseen events. As we continue to practice the fundamentals, within time, GLPs should become second nature rather than a deliberate action. Therefore, do not find the GLPs as a necessary evil, but a system that is created to elevate your game. If your Quality Assurance person needs to supplement their training, feel free to reach out to a Sponsor Quality Assurance group. The Sponsor QA group can provide advice, and also help through mentoring.

Come Join Us In St. Louis!

NAICC ANNUAL MEETING AND AG PRO EXPO
January 17-21, 2017
Hyatt Regency at the Arch • St. Louis, Missouri
For information call: (800) 881-5811 • www.naicc.org

The 2017 program and online registration is now open at http://naicc.org/meetings/2017-annual-meeting

The GLP Training and Monsanto Tour registration also available on this link.

EMERGING & EVOLVING TECHNOLOGY CALL FOR PAPERS

The NAICC Emerging & Evolving Technologies Session will be held Thursday, January 19, 2017 from 2:00 p.m. – 3:30 p.m. at the Hyatt Regency at the Arch, St. Louis, MO. This is a great way to advertise new products and services and is the only session designed specifically for and by NAICC members to showcase new technologies during the NAICC Annual Meeting!

There is an emphasis on Precision Agriculture in the 2017 Annual Meeting program so we strongly encourage presentations on this important topic.

Highlights:

NAICC Sustaining and Voting Members, as well as AG PRO EXPO Exhibitors, have the opportunity to give a brief, energizing synopsis of a product or technology to a full crowd of professional ag consultants, contract researcher and industry representatives. Past topics have included new crop protection products under development, new uses of current chemistry, new equipment and software. The emerging technologies presented are developed by Sustaining Members, Exhibitors, or our own NAICC crop and research consultant members. If it is new, our members want to hear about it!

Go to http://naicc.org/meetings/2017-annual-meeting for full details, deadlines, forms and rules.

The 2017 program and online registration is now open at http://naicc.org/meetings/2017-annual-meeting

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Go to http://naicc.org/meetings/2017-annual-meeting for full details, deadlines, forms and rules.

At the end of the day, we are all on the same team. And, as a team, we want to win. Despite the perception that Quality Assurance oversight can be overly detailed and “digging too much into the weeds”, in reality, a good Quality Assurance review raises the level of your game. Like a good coach, you may not necessary agree with him or her. But, if you heed his/her instructions, you will find that your game improves. Just like coaching, it is up to you to take appropriate actions on findings. Do it without emotion and do not get frustrated. You can disagree with the findings and you also have the right not to take any action. However, keep in mind that all good Quality Assurance personnel try hard to balance the need for compliance against the desire to be productive. Most importantly, at the end of the day, your Quality Assurance person is an integral part of your success. Therefore, let quality assurance personnel be your greatest ally.
Happenings on the Hill

Glenn Luedke, NAICC Legislative Assistant

EPA

The Senate Environment and Public Works Committee has issued a report that states federal agencies are overreaching their authority to regulate farmland. Frequently cited are the U.S. Army Corps of Engineers and the EPA. Based on their interpretation of the Clean Water Act (CWA), the two agencies attempt to control what crops are grown and how they are grown. Agricultural groups are urging Congress to take action and not wait for cases to reach the U.S. Supreme Court. A majority of U.S. Senators have gone on record voicing their concern regarding Waters of the US (WOTUS) rules. A federal court has temporarily halted WOTUS rule enforcement. However, landowners claim the two federal agencies continue to enforce the Act.

CropLife America is requesting that EPA seek public input on the agency’s evaluation of epidemiological studies for use in pesticide risk assessment. “Significant inconsistency” in EPA’s use of human data in reviews was given as the reason for the request.

The House and Senate majority are increasing scrutiny of EPA risk reviews for commonly used herbicides. Agency registration reviews of atrazine and glyphosate are being sought and the National Institute of Health has been asked to justify their support of an international panel that deemed glyphosate a possible carcinogen.

Environmental groups and the EPA have requested a federal district court to move up the decision date on a suit that challenges EPA’s exemption of neonicotinoid treated seeds from pesticide laws. Environmental groups claim the failure to regulate is unlawful. The EPA states the decision was based on past interpretations.

FARM BILL

The House Ag Committee decided they would not reopen the current Farm Bill for possible amendments. Congressional leaders stated that if discussion commenced, producers would most likely lose more than they would gain. The Food and Agricultural Policy Research Institute released its most recent report which noted they estimated farm income in 2016 will drop by $10 billion. The study points out that net farm income continues to decline. The 2014 Farm Bill established commodity and federal crop insurance programs and remain critical to enable producers to manage risk.

LABOR

Agriculture groups are calling on Congress to consider a more balanced approach (homeland security and food safety) on labor issues as consumers may be forced to make a decision regarding imported labor or more expensive imported food. Ag leaders continue to comment that Congress is moving too slowly on programs such as the H2A Temporary Agricultural application process.

The Department of Labor and other agencies have increased (August 1, 2016) the maximum Civil Money Penalties for violations. Congress passed the Federal Civil Penalties Inflation Adjustment Act in 2015. Many of the penalty decisions are made at the Department of Labor and OSHA. Improved record keeping is advised and all are advised to know their rights and responsibilities when faced with a Department of Labor audit.

Farm worker advocacy groups have petitioned the EPA to ban the chlorpyrifos pesticide at the urging of environmental groups which claim the commonly-used pesticide causes neurodevelopmental risks in children.

OSHA

The District of Columbia Court of Appeals has ruled OSHA violated the Occupational Safety and Health Act when it issued an enforcement memorandum in July 2015, redefining the retail facility exemption to the Process Safety Management Standard. The Court decision affirmed the importance of regulatory agencies adhering to standard forms of proper notice and comment procedures. If the ruling had been the reverse, according to industry leaders, producers and retailer options would experience increased limitations.

SPENDING RESOLUTION

The U.S. House of Representatives and the U.S. Senate passed a joint resolution that will fund the government through December 9 and thereby stopping a government shutdown on October 1. Both Houses are in recess until November 14 and will return following the general election. Upon return, the November-December (lame duck) session will require that finalized additional budget packages, including long-open term funding for F/Y 2017 be passed along with the Water Resources Development Act of 2016.

INTERNATIONAL SEED TREATY

The U.S. Senate ratified the International Treaty on Plant Genetic Resources for Food and Agriculture in late September. The purpose of the Treaty is to establish a legal framework for international germplasm exchange and allow access for public and private access to shared plant resources. The Treaty was adopted in 2001 and signed in 2002 but U.S Senate ratification was required in order for the U.S. to participate in the framework.

NAIICC Dues Renewal

Renewal notices were sent electronically in September. Second notices are going out this week. That means it NOT TOO LATE to renew your membership and be in the 2017 Membership Directory. Also remember to go to the NAICC website and update your profile if your information has changed.
As I was growing up my dad would arise in the morning, carefully shave, put on a clean white shirt and tie and head out for work. He did this seven days a week for most of the time I lived at home with my parents. I remember he was very particular about the kind of white shirt he wore, as well as his shoes. He was on his feet at work from 8 am to 9 pm six days a week and from 11 am to 7 pm on Sundays. Through the generosity of taxpayers and the federal government he had been able to go to the University of Wisconsin and obtain a pharmacy degree on the GI Bill, something that would have been beyond his financial reach otherwise. Even as he delivered newspapers as a youngster during the 1930’s to contribute to the family finances, he approached his work in a “professional” manner. His attention to the details of his white shirt and shoes was important to him, as he was presenting a “professional” appearance. Of course experiencing this growing up led directly to my life’s pursuit. I would only feel successful if I could be a “professional” that did NOT have to shave every day, and NEVER had to put on a white shirt and tie!

While the purpose of this essay is to address certification, specifically the CPCC program sponsored by the NAICC, I find “certification” to be mixed up with other words; ethics and professional being the most closely associated. Like my dad, I wanted a profession rather than a job. But when I started learning to be a crop consultant in 1981 there were few role models. I had several conversations in those early years with Ed Lloyd, the founder of Agvise Laboratories, and an early NAICC president, about the nature of crop consulting. The idea of independence came naturally to me but the question was what does constitute a “crop consultant”? Ed stressed the importance of education, research and knowledge. Agvise was the first company I knew of to offer “classes” in aspects of crop production that were important to the developing concept of a crop consultant. I use “developing concept” here since I feel we really weren’t crop consultants yet, though our business cards often said we were.

There was a widespread understanding in the ag industry through the 1980s that some sort of program was necessary to bring some standard level of competency to local ag retailers. Virtually all of the employees at ag retailers in my area started working there in high school and just stayed on after they graduated. Ag manufacturing company representatives, on the other hand, usually had four year college degrees and these were the folks talking directly to producers about how to use their products. I sat through innumerable “root and shoot imbibition” slides at dinners sponsored by chemical companies. As the number of products, and their complexity, increased, so did the number of dinners and slide presentations. The chemical companies realized that this was not an efficient sales process and wanted people at the local dealers competent enough to understand their products and tell producers how to use them properly. Since almost no employees at the local retailers had any education beyond high school the manufacturing community backed, and helped promote, the developing Certified Crop Advisor program. This is a program which allows those with no formal ag education to demonstrate a basic knowledge proficiency.

At the same time the CCA program was being developed there was a parallel discussion going on within NAICC about a professional certification program. I was approached by several chemical company representatives asking me to support the idea of the CCA. They were concerned that an NAICC program would exclude those already working at local dealers. I certainly felt the CCA program was a step in the right direction for the industry, but that it didn’t really apply to me as a “professional” crop consultant. I still feel that way and personally do not participate in the CCA program. One of the big benefits of the CCA program to me, however, has been the winter meeting industry developed as a result of the CCA’s continuing education requirement. Myriads of educational meetings are now available, sponsored both by university extension and industry, with the CEU “carrot” drawing attendance.

So, with the CCA program, and its almost universal availability of CEU producing educational programs, are you CPCC certified through NAICC? There was a short period of time during the development of the CCA program when folks at the local retailers all began calling themselves crop consultants. To me, one of the big successes of the CCA program was that this practice mostly stopped and “agronomist” replaced crop consultant on their business cards. While at the time I could still argue with that title, retailers have begun to hire people with four year college degrees to oversee their agronomy departments. This is more progress in the right direction. But the CPCC program still sets you apart from that college educated sales agronomist (my preferred title) with his or her CCA designation.

In preparation for this article I sent out an email asking some CPCC certified NAICC members why they were certified. Overwhelmingly the reason given was their desire for personal professionalism. No one said they commanded a higher salary because of it. No one said that it was a requirement for the work they do. I would go further and say, like NAICC itself, it defines what a crop consultant is. While CCA has a Code of Ethics, there are additional components of education, experience, and professionalism contained in the CPCC program. I am excluding independence here, because that is a subcategory of the CPCC. But I’m sure anyone who has read this far is well aware of the importance of that “I”, as in CPCC-I and NAICC.

In my crop consulting practice, the CPCC-I certification has allowed me to expand my services into areas other than direct agronomic service to producers. It has provided a way to capitalize on my 35 years of experience as a crop consultant. I have been able to stand up for producers in court and arbitration when buried pipelines have adversely affected their operations with no compensation. I have mediated issues of crop damage liability between growers. I have done crop loss assessment for insurance companies, including Federal Crop Insurance representatives. All

Continued on page 6.
of these kinds of activities are possible because of my CPCC-I certification. So for me the CPCC program directly contributes to my income. I have sat across an arbitration table with a CCA certified individual representing the other side, and I have experienced the difference.

So, should you be CPCC certified? I guess that depends on your business, and how you see yourself. Are you an expert at what you do? If you are, how do you show prospective clients that you, in fact, know what you are doing? For me as a crop consultant, the CPCC-I is a no-brainer. If you are a researcher the situation is probably different. I don’t know, outside of California, Louisiana and North Carolina, a place where crop consultants need to be licensed. Research companies tend to fall under some federal regulations which, so far, crop consultants do not face. So if you meet GLP regulations and any other licensing requirements what is the value of NAICC certification? Perhaps if you like regulation by outside agencies there is no value. But the professionalism demonstrated by certification and membership in NAICC gives you a voice in shaping the regulations you will operate under. If you feel that a smaller government and less regulation is in our future, I have some beach front property in the desert I would like to talk to you about. Right or wrong, the more credentials you have, the more your voice will be respected.

Professionalism can mean just that you are paid to do something, as in a professional football player. But it can mean much more, that you are educated, competent, qualified, expert, experienced, ethical and dedicated to your profession. Certification is a way to demonstrate your commitment. Certification has certainly played a role for me in my pursuit of success. I have not shaved in decades and my ties are all leftovers from the 70’s, when my contemporaries were getting married.

Richard L. Jensen, Ph.D. Memorial Scholarship Applications

Applications for Richard L. Jensen, Ph.D. Memorial Scholarships are available at [http://thefeae.org/jensen-scholarship/](http://thefeae.org/jensen-scholarship/). We encourage you to share the application with your summer employees or college students working toward an Ag degree. Students working for NAICC members qualify for preferred status.

Three scholarships are provided by NAICC’s Foundation for Environmental Agriculture Education (FEAE):

- One $3,000 award is given to a deserving third-year student in Agriculture with a major in Crop Production or allied subject.
- Two $1,500 awards are given to deserving college students in Agriculture.

Application deadline is November 1, 2016.

The mission of the Foundation for Environmental Agricultural Education is to catalyze innovative education and training for current and future professional crop management practitioners including researchers and crop consultants.

IPM Enhancement Grants RFA Released

The 2017 Request for Applications (RFA) for the IPM Enhancement Grants is now available. Deadline for proposals is Friday, November 18, 2016 at 5 PM EST.

The IPM Enhancement Grants Program (IPMEP) is a foundational mechanism used by SIPMC to address important issues affecting the region that has produced many significant outputs and favorable outcomes addressing Global Food Security challenges including invasive species, endangered species, pest resistance, and impacts resulting from regulatory actions. A competitive process is used each year to solicit and select projects for funding.

Any IPM setting is applicable to the IPM Enhancement Grant program, including agriculture, urban and school, forestry and recreation. The funding covers a one-year project, so please keep that in mind when considering your proposal. See below for project types that this grant funds.

An outcome-based approach for our funded projects has been adopted. Each component of the proposal is explained in detail; please take the time to read through the RFA carefully.

If you are familiar with this grant program from previous years, this year’s RFA does NOT cover proposals for IPM Documents. IPM Documents will be included in a separate RFA this year. If you would like to submit a proposal for an IPM Document, please go to [http://bit.ly/2dq8qh](http://bit.ly/2dq8qh).

To get to the RFA and required forms, please go to [http://bit.ly/2dpONr4](http://bit.ly/2dpONr4), which will explain more about the online submission system.

Please read through the entire RFA before beginning your planning, as much of the structure for the project narrative has changed. To explain the new format, we will conduct a webinar on Friday, October 9 at 2:00 PM Eastern time. To register for the webinar, go to [http://bit.ly/2dqB69T](http://bit.ly/2dqB69T).

Project directors can apply for one of three (3) project types:

- **Seed** - up to $30,000; successful proposals will have a strong potential to initiate, enable, facilitate and/or catalyze effective solutions to important IPM issues and challenges. These projects plant a seed that has good potential to grow into a solution.
- **Capstone** - up to $30,000; successful proposals build on previous research and development efforts for projects involving outreach, implementation, and/or educational approaches.
- **IPM Working Group** - up to $40,000; please read RFA for requirements

Projects are limited to one year. When determining your project start and end dates, note that funds will be available as early as March 1, 2017, and must be expended by February 28, 2018.

Be sure to download and use THIS YEAR’s forms when putting together your proposal. Do not substitute NIFA forms or forms from previous IPM Enhancement grant RFAs.
The correct answer from the September newsletter was “The Very Hungry Caterpillar”.

Congratulations to Michelle Hampton for winning the gift card!

Answer the following question for a chance to win a $50 Visa Gift Card:

What is the name of this famous TV pet?

Submit your answer here:

https://goo.gl/formsVzMDmGYfvFdNHHQj2

One winner will be randomly selected from the correct answers and announced in the November newsletter.