

Commission **Recommendation**  
on the management of intellectual property  
in knowledge transfer activities  
and  
**Code of Practice** for universities  
and other public research organisations



**Policies to foster KT in Europe**  
**„ Technology Transfer - title, profession, system or action!”**

**CERT-TTT-M Meeting**

**European Commission, DG Research**

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**Policy officer, SNE**

**Riga 24/45, 2009**

Nothing in this presentation shall commit the Commission in any way and only represents  
the author ' s opinion



European Research Area

## Facts & Figures

**The EU is the world's largest producer of scientific output ...**

	US	EU
World share of scientific articles	32%	38%

**.. but has problems in exploiting it through e.g. patents, licenses and spin-offs.**

	US (AUTM)	EU (ProTon)
Survey respondents (universities)	228	392
No. of invention disclosures	27382	4570
Priority patent applications	10272	2310
No. of options and licenses	4932	731
No. of spin-offs	628	434

## What has been done?

CREST IP Expert Groups 2004, 2006 + Responsible Partnering Handbook 2005



Communication on knowledge transfer and Guidelines 2007



Council conclusions on German presidency "IP Charter" initiative 2007



"Knowledge sharing" axis of Era Green paper + KS expert group 2007



Commission Recommendation  
on the management of intellectual property  
in knowledge transfer activities

and

Code of Practice for universities  
and other public research organisations

2008

## The Commission Recommendation includes

- Key **recommendations to Member States** for establishing or adapting intellectual property / knowledge transfer policies
- **Code of Practice for universities and PROs** with operational principles for setting up institutional policies and knowledge transfer systems (Annex I)
- **List of best practice examples for Member States** to support implementation of the recommendations (Annex II)

## Recommendations to Member States

- **Ensure** that public research organisations define **knowledge transfer as strategic priority** and develop and publicise respective policies and procedures
- **Support** the development of **knowledge transfer capacities** and skills, also among students
- **Promote broad dissemination of research results** while enabling protection of intellectual property
- **Cooperate** and take steps to ensure coherence of ownership regimes and **to facilitate cross-border** collaborations and **knowledge transfer**
- **Ensure** equitable and **fair treatment** of all participants in **international R&D collaborations** (ownership and access rights to IP)

## Recommendations to Member States

- Take steps to **ensure the widest possible implementation of the Code of Practice**
- **Designate a national contact point**, the tasks of which should include the **coordination of** measures regarding **knowledge transfer ... in liaison with** similar contact points in **other Member States**
- **Inform** the Commission by 15 July 2010 and every two years thereafter **of measures taken** on the basis of this Recommendation, **as well as their impact**



EUROPEAN  
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Research Area

# The Code of Practice

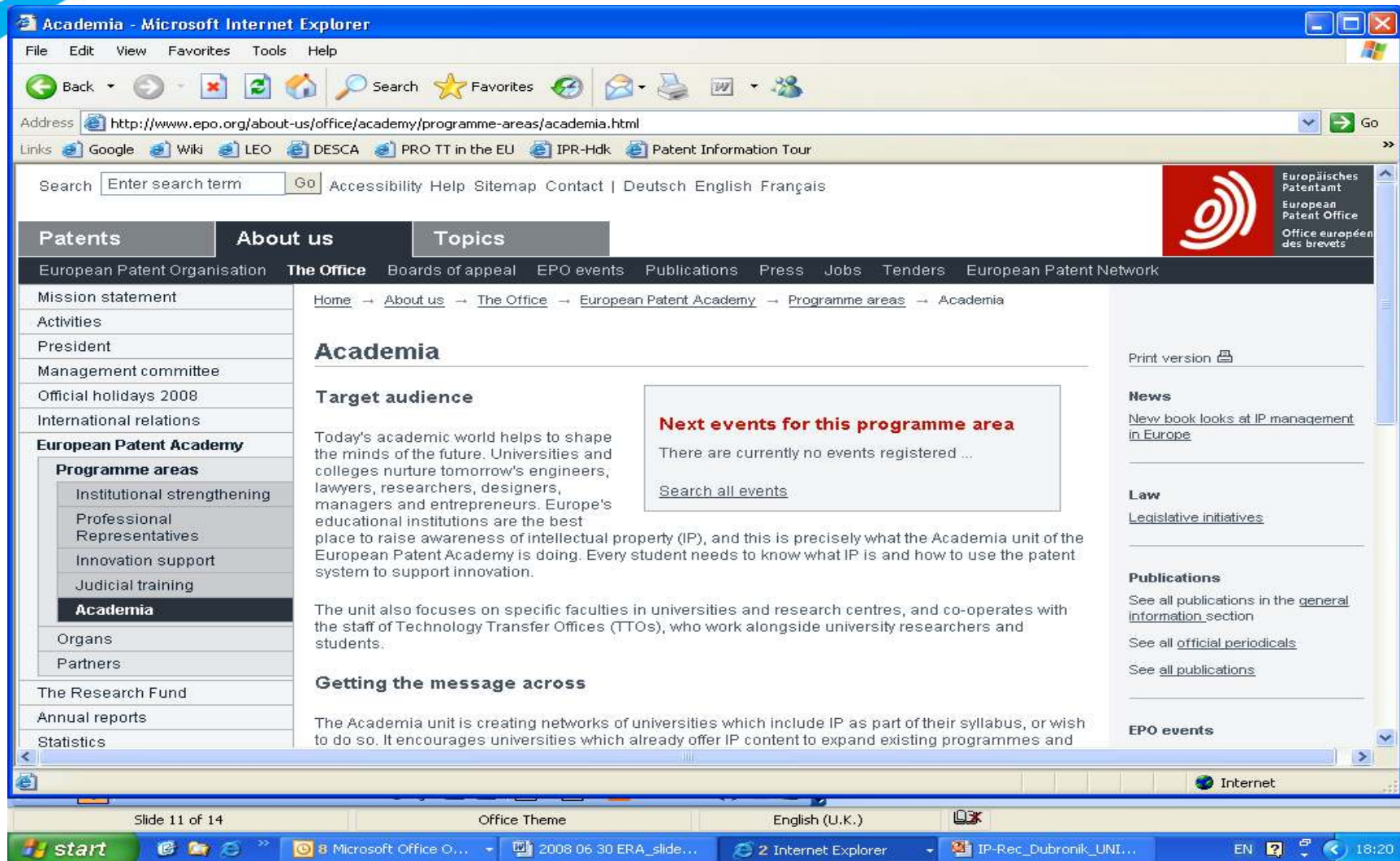
## Code of Practice for universities and other public research organisations

- Principles for an **internal** intellectual property (IP) **policy** for effective management of their own IP  
(policy, rules, procedures, incentives, awareness, training, ...)
- Principles for a **knowledge transfer (KT) policy** focusing on active transfer and exploitation of IP  
(exploitation strategies and policies, including for licensing and spin-offs; access to professional KT services; sharing of financial returns; monitoring of KT activities)
- Principles regarding **collaborative and contract research** (basic principles for IP ownership and access rights)

## Principles for an internal IP policy

- IP policy should be **long-term strategy** and mission of the PRO, easy accessible with responsible contact point
- Policy should contain **clear rules for staff and students**
  - Disclosure of new ideas of commercial interest
  - Ownership of research results
  - Engagement with third parties
  - Publication, dissemination policy
- Develop policy in line with education and research **mission** regarding identification, possible exploitation, protection of IP, open access policies etc.
- Creation of **IP portfolios**, setting up IP pools where appropriate
- **Training** for IP awareness and basic skills in IP and KT
- **Incentives**

# EPO IP training for Academia



The screenshot shows a Microsoft Internet Explorer browser window displaying the EPO IP training for Academia page. The browser's address bar shows the URL: <http://www.epo.org/about-us/office/academy/programme-areas/academia.html>. The page content includes a search bar, navigation tabs for Patents, About us, and Topics, and a main content area with the following sections:

- Academia**: A section titled "Academia" with a "Target audience" box stating: "Today's academic world helps to shape the minds of the future. Universities and colleges nurture tomorrow's engineers, lawyers, researchers, designers, managers and entrepreneurs. Europe's educational institutions are the best place to raise awareness of intellectual property (IP), and this is precisely what the Academia unit of the European Patent Academy is doing. Every student needs to know what IP is and how to use the patent system to support innovation." Below this, it says: "The unit also focuses on specific faculties in universities and research centres, and co-operates with the staff of Technology Transfer Offices (TTOs), who work alongside university researchers and students."
- Getting the message across**: A section stating: "The Academia unit is creating networks of universities which include IP as part of their syllabus, or wish to do so. It encourages universities which already offer IP content to expand existing programmes and..."
- Next events for this programme area**: A box stating: "There are currently no events registered..." with a link to "Search all events".
- News**: A section titled "News" with a link to "New book looks at IP management in Europe".
- Law**: A section titled "Law" with a link to "Legislative initiatives".
- Publications**: A section titled "Publications" with links to "See all publications in the general information section", "See all official periodicals", and "See all publications".
- EPO events**: A section titled "EPO events" with a dropdown menu.

The browser's taskbar at the bottom shows the system tray with the date and time (18:20) and several open applications, including Microsoft Office and Internet Explorer.

## Knowledge transfer policy

- Consider **different exploitation** mechanisms and partners (e.g. **spin-offs**, innovation support service etc.)
- Have own or access to **professional knowledge transfer service** (advice on legal, financial, commercial, IPR etc.)
- Develop and publicise a **licensing** policy (transfer of ownership or exclusive license?)
- Have clear **principles on financial returns** from KT revenues between PRO, department, inventor
- **Monitor** IP protection and KT activities and make them visible

Startseite - Windows Internet Explorer

http://www.ttt-manager.eu/index.php?option=com\_content&view=article&id=74&Itemid=28

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Startseite



**CERTIFIED TTT MANAGER**  
a framework of certification for transnational technology transfer managers in europe  
FP6 Project 2007-2009

Home News & Events Contact

**About Cert-TTT-M**

- What is CERT-TTT-M
- Initial Position
- Objectives
- Activities
- Partners

**Dissemination Material**

- Training Provider
- Policy-Maker
- TT-Stakeholder

**Results in detail**

**GET YOUR ACCESS NOW!**

## Welcome to CERT-TTT-M, an initiative towards an European Certification & Training Framework for Technology Transfer Management

We are pleased to inform you about a project funded by the European Commission, named "Certified Trans-national TT Manager - Building up a framework to qualify TT - Managers on a trans-national level with mutual recognition".

The aim of this project is:

- to create a training framework for technology transfer managers in order to professionalise their role,
- to help to create a more defined career structure for them and to assist with mobility of managers within the European Union,
- to provide a legal and organisational framework for the mutual recognition aiming at an accreditation of the course on a Europe-wide basis.

A training framework has been elaborated based on the results of surveys conducted within the project on training needs and opinions expressed by professionals and experts and on the analysis of training programmes available in technology transfer throughout Europe.

Get more information about the CERT-TTT-M project!

**Events & News**

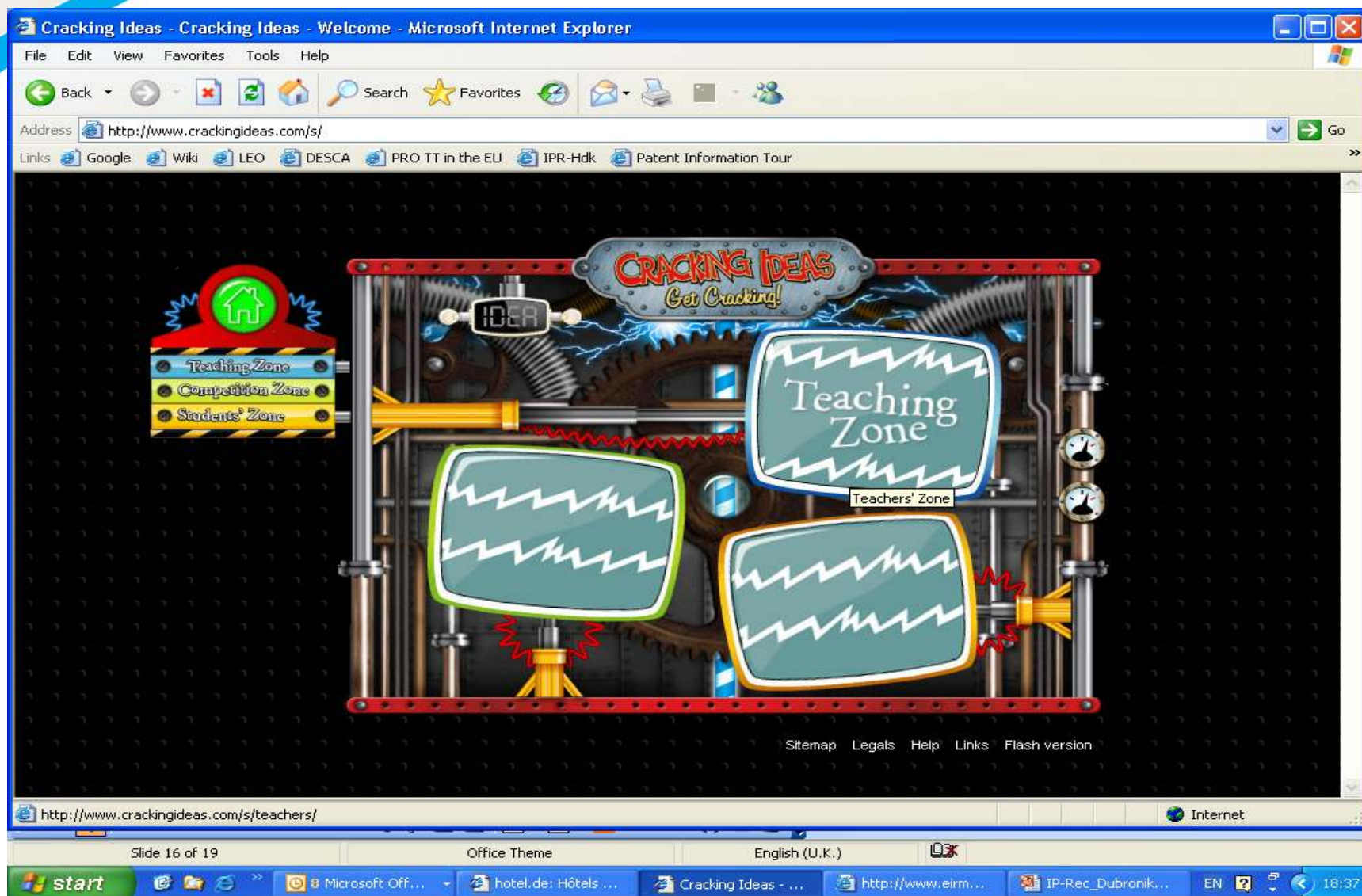
- 3.12.08 Rotterdam Conference on TT profession
- 29.9.08 Amsterdam Know-How Exchange with LES/CLP, 29/30
- 14.8.08 Paris - L'Oréal Joint Workshop at LES FRANCE
- 10.7.08 Course Patent & License Management
- 17.6.08 Stockholm Joint Workshop at VINNOVA
- 3.4.08 Vienna Mid-Term Meeting
- 29.3.08 München Joint Workshop at European Patent Office

**TRAINING PROVIDED**

Internet 100%

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# UK IPO IP training for kids



Cracking Ideas - Cracking Ideas - Welcome - Microsoft Internet Explorer

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Address <http://www.crackingideas.com/s/> Go

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Sitemap Legals Help Links Flash version

<http://www.crackingideas.com/s/teachers/> Internet

Slide 16 of 19 Office Theme English (U.K.)

start Microsoft Office hotel.de: Hôtels ... Cracking Ideas - ... http://www.irm... IP-Rec\_Dubronik... EN 18:37

# Pro Inno Europe Project

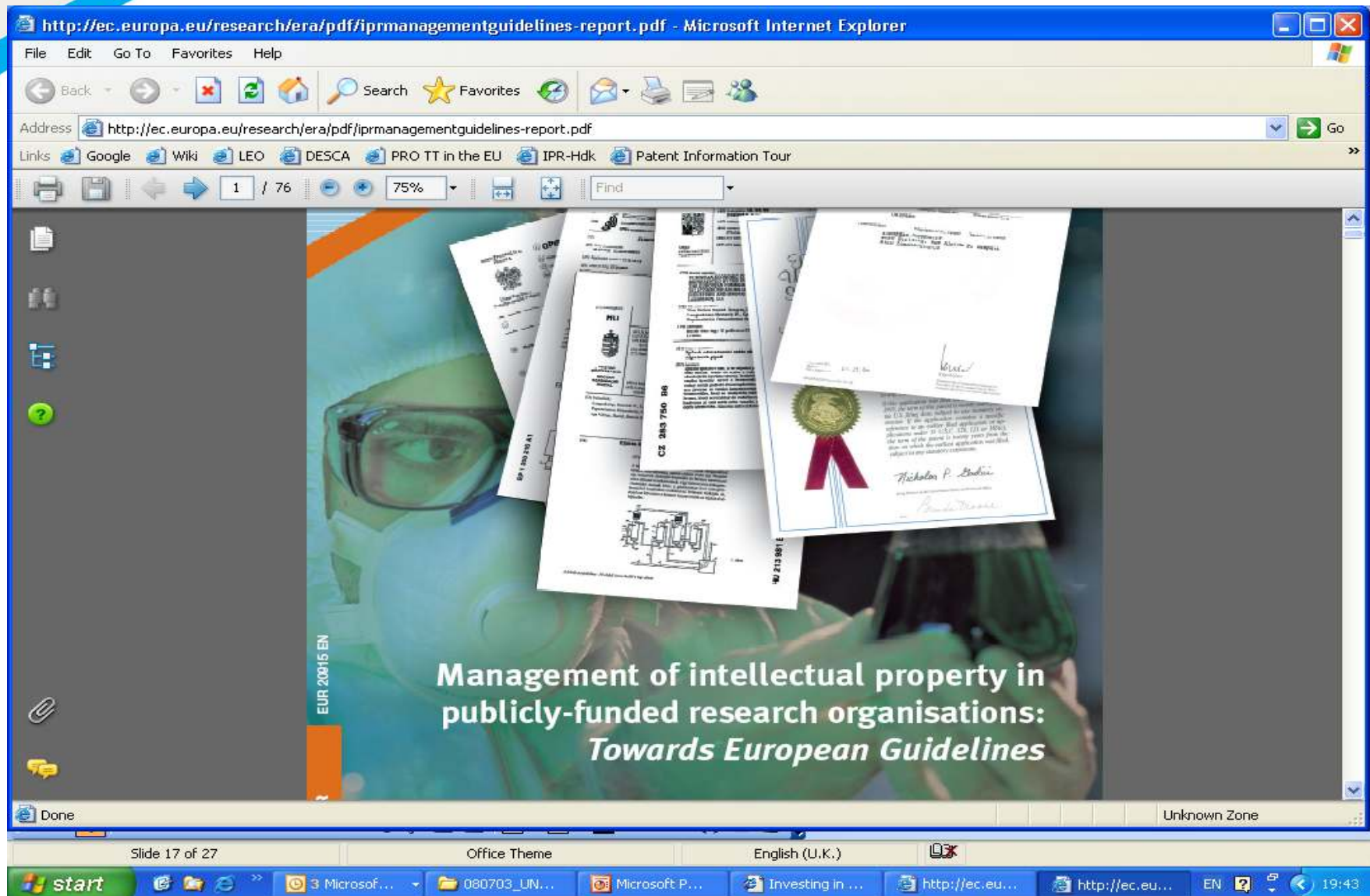


The screenshot shows the PRO INNO Europe website in a Windows Internet Explorer browser window. The browser title is "PRO INNO Europe: Homepage - Windows Internet Explorer". The address bar shows the URL "http://www.proinno-europe.eu/index.cfm?fuseaction=page.home". The website header features the PRO INNO EUROPE logo and the tagline "New and better innovation policies for Europe". A navigation menu includes links for Home, Overview, Themes, Publications, News & Events, Who is who, Partner Search Tool, and Links. The main content area is divided into several sections:

- About:** A text box describing PRO INNO Europe as an initiative of Directorate General Enterprise and Industry, aiming to be the focal point for innovation policy analysis, learning, and development in Europe.
- Network Members:** A registration form with fields for Username and Password, and buttons for Register and Log in.
- European Cluster Alliance:** A logo for the European Cluster Alliance.
- Policy Analysis, Policy Learning, Policy Development:** A central graphic with a circular arrangement of colorful ribbons, each labeled with a project component: INNO-Metrics, INNO-Actions, INNO-Nets, INNO-Learning Platform, INNO-Views, INNO-Appraisal, INNO-Grips, and INNO-Policy Trendchart.
- LATEST NEWS:** A news item titled "INNO-Learning Platform: Call for expressions of interest for public innovation funding agencies to participate in pilot testing of peer review and exchange of good practice activities."
- Highlights:** A list of recent events and reports, including "2009: European Year of Creativity and Innovation", "INNO-Learning Platform: Call for expressions of interest for public innovation funding agencies...", "New ECA report: The Use of Data and Analysis as a Tool for Cluster Policy", "Call for hosts: INNO-Views workshop (Brussels)", and "Investors enthusiastic about future business, says EASY".
- Events:** A list of upcoming events, including "11 May - 15 May 2009 The Hague-Rotterdam area, The Netherlands" and "07 May - 08 May 2009 Prague, Czech Republic".

The browser's taskbar at the bottom shows the Start button, several open applications (Microsoft Office, Internet Explorer), and the system clock showing 16:24 on 09/01/2009.

# European Expert Group on Management of IP



http://ec.europa.eu/research/era/pdf/iprmanagementguidelines-report.pdf - Microsoft Internet Explorer

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Address <http://ec.europa.eu/research/era/pdf/iprmanagementguidelines-report.pdf>

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1 / 76 75% Find

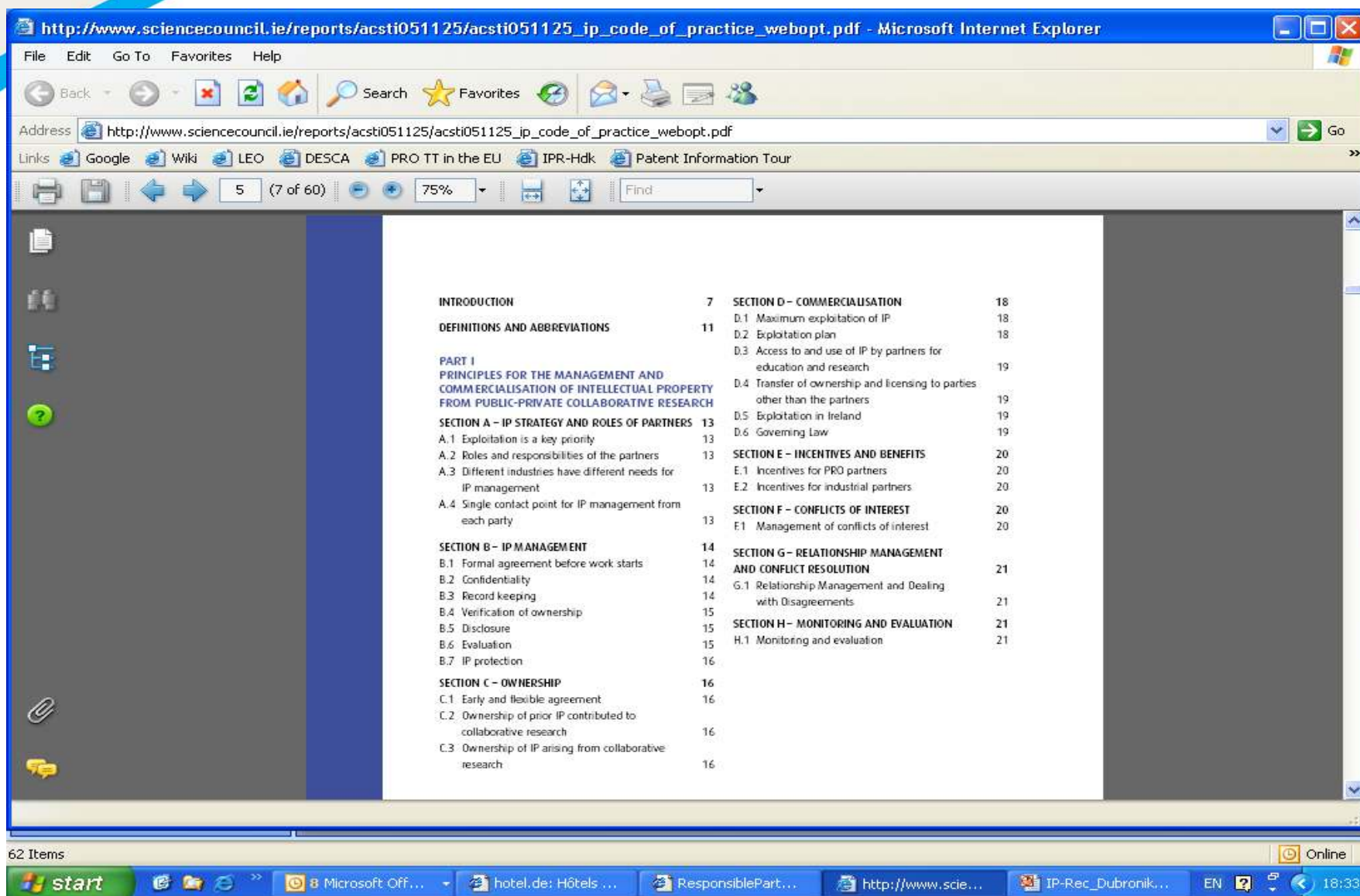
Management of intellectual property in publicly-funded research organisations:  
*Towards European Guidelines*

EUR 20015 EN

Slide 17 of 27 Office Theme English (U.K.)

start 3 Microsof... 080703\_UN... Microsoft P... Investing in ... http://ec.eu... http://ec.eu... EN 19:43

# Irish Code of Practice on Management of IP



The screenshot shows a Microsoft Internet Explorer browser window with the address bar containing the URL: [http://www.sciencecouncil.ie/reports/acsti051125/acsti051125\\_ip\\_code\\_of\\_practice\\_webopt.pdf](http://www.sciencecouncil.ie/reports/acsti051125/acsti051125_ip_code_of_practice_webopt.pdf). The browser interface includes a menu bar (File, Edit, Go To, Favorites, Help), a toolbar with navigation buttons (Back, Forward, Stop, Refresh, Home, Search, Favorites), and a status bar at the bottom showing '62 Items' and 'Online'.

The main content area displays a table of contents for the document. The table is organized into sections and subsections, with page numbers listed on the right side of each entry.

<b>INTRODUCTION</b>	<b>7</b>	<b>SECTION D – COMMERCIALISATION</b>	<b>18</b>
<b>DEFINITIONS AND ABBREVIATIONS</b>	<b>11</b>	D.1 Maximum exploitation of IP	18
<b>PART I</b>		D.2 Exploitation plan	18
<b>PRINCIPLES FOR THE MANAGEMENT AND COMMERCIALISATION OF INTELLECTUAL PROPERTY FROM PUBLIC-PRIVATE COLLABORATIVE RESEARCH</b>		D.3 Access to and use of IP by partners for education and research	19
<b>SECTION A – IP STRATEGY AND ROLES OF PARTNERS</b>	<b>13</b>	D.4 Transfer of ownership and licensing to parties other than the partners	19
A.1 Exploitation is a key priority	13	D.5 Exploitation in Ireland	19
A.2 Roles and responsibilities of the partners	13	D.6 Governing Law	19
A.3 Different industries have different needs for IP management	13	<b>SECTION E – INCENTIVES AND BENEFITS</b>	<b>20</b>
A.4 Single contact point for IP management from each party	13	E.1 Incentives for PRO partners	20
<b>SECTION B – IP MANAGEMENT</b>	<b>14</b>	E.2 Incentives for industrial partners	20
B.1 Formal agreement before work starts	14	<b>SECTION F – CONFLICTS OF INTEREST</b>	<b>20</b>
B.2 Confidentiality	14	F.1 Management of conflicts of interest	20
B.3 Record keeping	14	<b>SECTION G – RELATIONSHIP MANAGEMENT AND CONFLICT RESOLUTION</b>	<b>21</b>
B.4 Verification of ownership	15	G.1 Relationship Management and Dealing with Disagreements	21
B.5 Disclosure	15	<b>SECTION H – MONITORING AND EVALUATION</b>	<b>21</b>
B.6 Evaluation	15	H.1 Monitoring and evaluation	21
B.7 IP protection	16		
<b>SECTION C – OWNERSHIP</b>	<b>16</b>		
C.1 Early and flexible agreement	16		
C.2 Ownership of prior IP contributed to collaborative research	16		
C.3 Ownership of IP arising from collaborative research	16		

# Monitoring

- Indicators could be used by
  - Policy makers
  - Associations
  - Individual PROs and KTOs
- ... for the purposes of
  - Monitoring knowledge transfer activities (CoP I.14)
  - Monitoring implementation (CoP II.18)
  - Policy monitoring and development
  - Benchmarking and professional development

Two major pan-European surveys conducted annually  
by associations of knowledge transfer professionals



**Summary Report for Respondents:  
The ASTP Survey for Fiscal Year 2006**

September 24, 2007

Anthony Arundel<sup>1</sup> & Catalina Bordoy<sup>1</sup>

Report produced by UNU-MERIT  
for the Association of European  
Science and Technology  
Transfer Professionals

<sup>1</sup> UNU-MERIT: Maastricht Economic and social Research and training centre on Innovation and Technology. Tel: 31 43 388 4452. Email: [A.Arundel@merit.unimaas.nl](mailto:A.Arundel@merit.unimaas.nl); [C.bordoy@merit.unimaas.nl](mailto:C.bordoy@merit.unimaas.nl).



**The Proton Europe  
Fourth Annual Survey Report  
(fiscal year 2006)**



Science|Business - From Lab to Market - News, Insight, Opportunity - Windows Internet Explorer

http://www.sciencebusiness.net/aces/index.php

File Edit View Favorites Tools Help

CORDIS: FP7 : Find a d... https://drc.uni-mb.si/m... DRC - Welcome Science|Business - ...

## ACADEMIC ENTERPRISE AWARDS EUROPE 2008



# ACES

THE FIRST PAN-EUROPEAN PROGRAMME TO RECOGNISE ENTERPRISE IN UNIVERSITIES AND RESEARCH INSTITUTES

**ACES Home**

- Timescales
- Criteria and judging
- Make a nomination**
- Sponsorship
- The Investment Connection
- Awards News

**Nominations open NOW. Closing date: 30 September.**

**FOUNDING UNIVERSITY SUPPORTERS**

**Chalmers University of Technology**

### RECOGNITION FOR ENTERPRISE



The Science|Business Innovation Board, a blue-ribbon panel of leaders in industry, academia and policy, will judge the awards.

Innovation is the lifeblood of a vibrant economy – but in Europe, it's often said, a risk-averse culture in its universities prevents innovative ideas from getting out of the labs and into the marketplace.

To help change that culture, the first Europe-wide awards for academic enterprise are being launched, with a coalition of leading European universities, multinational corporations, foundations, and the **Science|Business** news service. The awards will be promoted at a series of events and on-line activities through 2008/9, and will be overseen by the Science|Business Innovation Board. The programme will culminate in a conference and awards ceremony in

**Nominations open NOW. Closing date: 30 September.**

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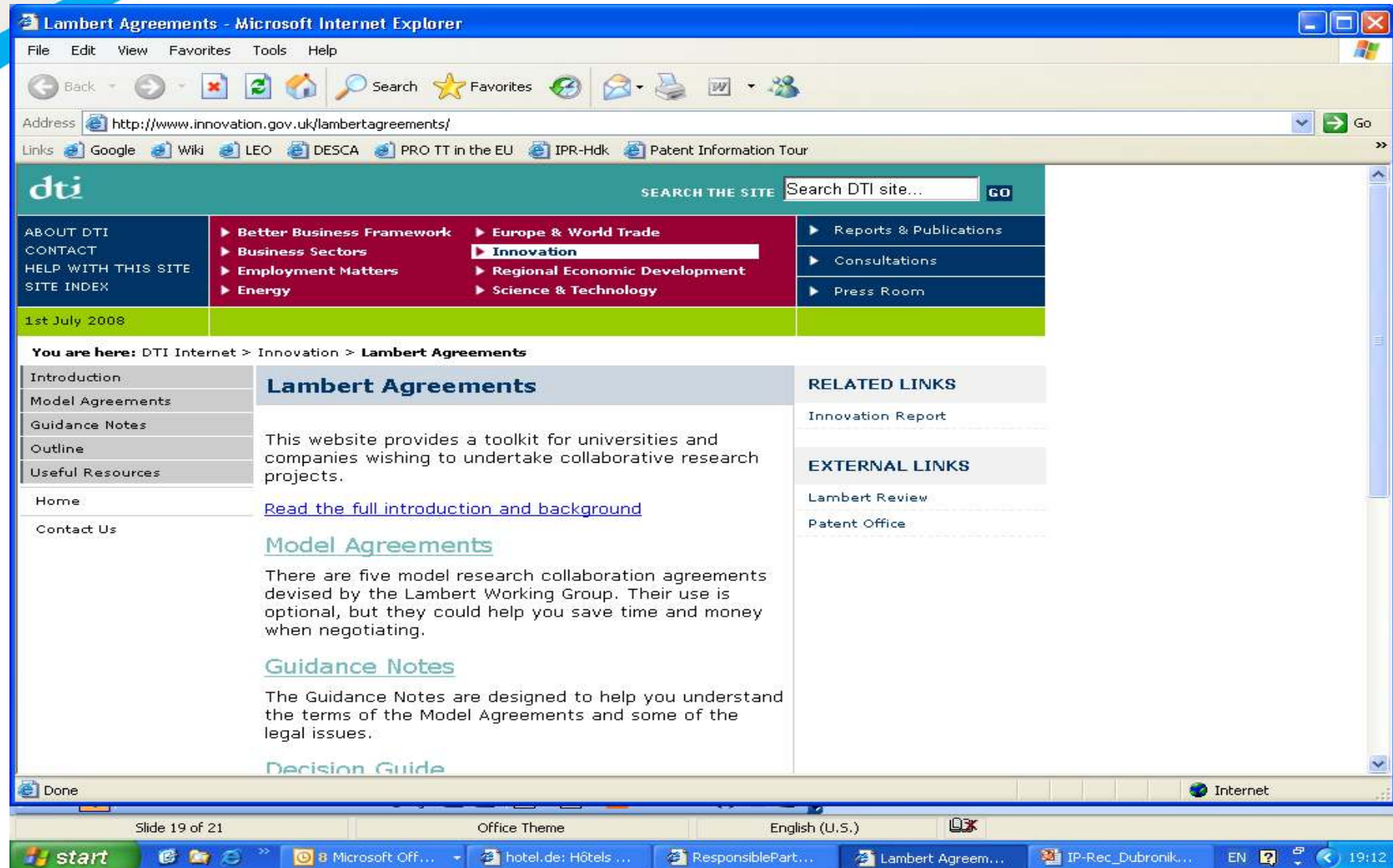
letter of invitation Shalini.doc (Read-Only) - Microsoft Word

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## Collaborative and Contract Research

- Rules should be compatible with **mission** of each party
- IP-related issues should be clarified at **management level** and **as early as possible** (identification of Foreground and Background, access rights, sharing of revenues etc.)
- **Ownership** of foreground in **collaborative** and **contract** research should be clarified and negotiated
- **Access rights** should be clarified from the beginning of project

# UK Lambert agreements



**Lambert Agreements - Microsoft Internet Explorer**

Address: <http://www.innovation.gov.uk/lambertagreements/>

dti SEARCH THE SITE Search DTI site... GO

**ABOUT DTI**  
CONTACT  
HELP WITH THIS SITE  
SITE INDEX

- Better Business Framework
- Business Sectors
- Employment Matters
- Energy
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- Regional Economic Development
- Science & Technology
- Reports & Publications
- Consultations
- Press Room

1st July 2008

**You are here:** DTI Internet > Innovation > Lambert Agreements

**Lambert Agreements**

Introduction  
Model Agreements  
Guidance Notes  
Outline  
Useful Resources

This website provides a toolkit for universities and companies wishing to undertake collaborative research projects.

[Read the full introduction and background](#)

**Model Agreements**

There are five model research collaboration agreements devised by the Lambert Working Group. Their use is optional, but they could help you save time and money when negotiating.

**Guidance Notes**

The Guidance Notes are designed to help you understand the terms of the Model Agreements and some of the legal issues.

**Decision Guide**

**RELATED LINKS**

- Innovation Report

**EXTERNAL LINKS**

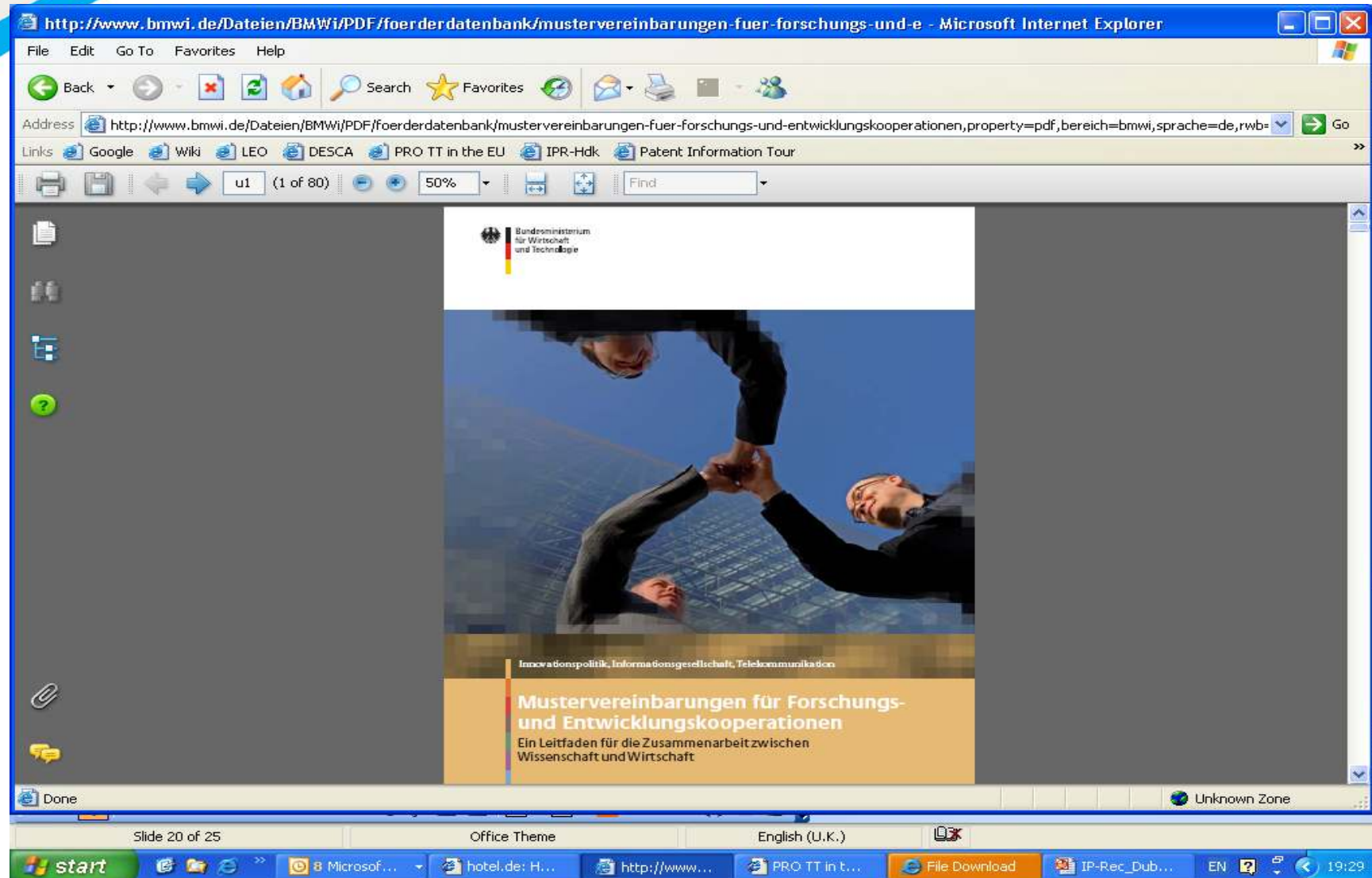
- Lambert Review
- Patent Office

Done Internet

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# Model agreements of German Ministry



http://www.bmwi.de/Dateien/BMWi/PDF/foerderdatenbank/mustervereinbarungen-fuer-forschungs-und-e - Microsoft Internet Explorer


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Address <http://www.bmwi.de/Dateien/BMWi/PDF/foerderdatenbank/mustervereinbarungen-fuer-forschungs-und-entwicklungskooperationen,property=pdf,bereich=bmwi,sprache=de,rwb=...> Go

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 Bundesministerium für Wirtschaft und Technologie

Innovationspolitik, Informationsgesellschaft, Telekommunikation

**Mustervereinbarungen für Forschungs- und Entwicklungskooperationen**  
Ein Leitfaden für die Zusammenarbeit zwischen Wissenschaft und Wirtschaft

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Slide 20 of 25 Office Theme English (U.K.)

start 8 Microsof... hotel.de: H... http://www... PRO TT in t... File Download IP-Rec\_Dub... EN 19:29

# CREST Toolkit for collaborative research

<http://www.ipo.gov.uk/crestreport.pdf> - Microsoft Internet Explorer

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Address <http://www.ipo.gov.uk/crestreport.pdf> Go

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42 / 95 75% Find

and understand the differences which you need to take account of, and to understand the position of your research partner.

12. Having gone through this process you will be in a position to identify key issues for you and your potential partner. You will be able to see the issues on which you need to get advice, and where to get that advice. This should provide you with the foundations from which to negotiate a successful collaboration agreement.

**FIGURE 1 Simplifying the Process of Negotiating a Cross-border Collaboration**

INFORMATION REQUIRED BY BOTH PARTIES

**Step 1** Consider all of these issues  
 What does Business need to know about situation in country B

**Step 2** Identify areas which are new or need explaining  
 What does PRO need to know about situation in country A

**(1) Differences regarding:**

- Obtaining IPRs
- Ownership of IPRs
- Effect of Funding
- Exploitation of IPRs
- Legal systems
- Publication & confidentiality

**(2) Where to get information**

**Step 3** Build a picture of what issues are important for each party

**Step 4** Seek Advice, Discuss, Negotiate

Simplifies and speeds-up the negotiation of an effective cross-border collaboration agreement

Business COUNTRY A ↔ Cross-border Collaboration ↔ PRO COUNTRY B

**TOOLKIT**

41

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Slide 19 of 23 Office Theme English (U.K.)

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# TT study – compare tool

Compare countries - Windows Internet Explorer

http://www.eutechnologytransfer.eu/compare.php

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http://oice.vu.ed... http://www.eua.... LEO Ergebnisse f... Compare cou... Investing in Euro...

European Commission

DLA PIPER

Mason Hayes+Curran

Privacy Policy

## Monitoring and analysis of technology transfer and intellectual property regimes and their use

Home Context Background information Downloads Compare tool Contact Feedback Links

### Compare tool

Select countries to compare			Select topics
<input type="checkbox"/> Austria	<input type="checkbox"/> Germany	<input type="checkbox"/> Malta	<input type="checkbox"/> patents
<input type="checkbox"/> Belgium	<input type="checkbox"/> Greece	<input type="checkbox"/> Poland	<input type="checkbox"/> utility models
<input type="checkbox"/> Cyprus	<input type="checkbox"/> Hungary	<input type="checkbox"/> Portugal	<input type="checkbox"/> industrial designs
<input type="checkbox"/> Czech Republic	<input type="checkbox"/> Ireland	<input type="checkbox"/> Slovak Republic	<input type="checkbox"/> copyright
<input type="checkbox"/> Denmark	<input type="checkbox"/> Italy	<input type="checkbox"/> Slovenia	<input type="checkbox"/> databases
<input type="checkbox"/> England	<input type="checkbox"/> Japan	<input type="checkbox"/> Spain	<input type="checkbox"/> trademarks
<input type="checkbox"/> Estonia	<input type="checkbox"/> Latvia	<input type="checkbox"/> Sweden	<input type="checkbox"/> know-how
<input type="checkbox"/> Finland	<input type="checkbox"/> Lithuania	<input type="checkbox"/> The Netherlands	<input type="checkbox"/> professor's privilege
<input type="checkbox"/> France	<input type="checkbox"/> Luxembourg	<input type="checkbox"/> United States	

Submit

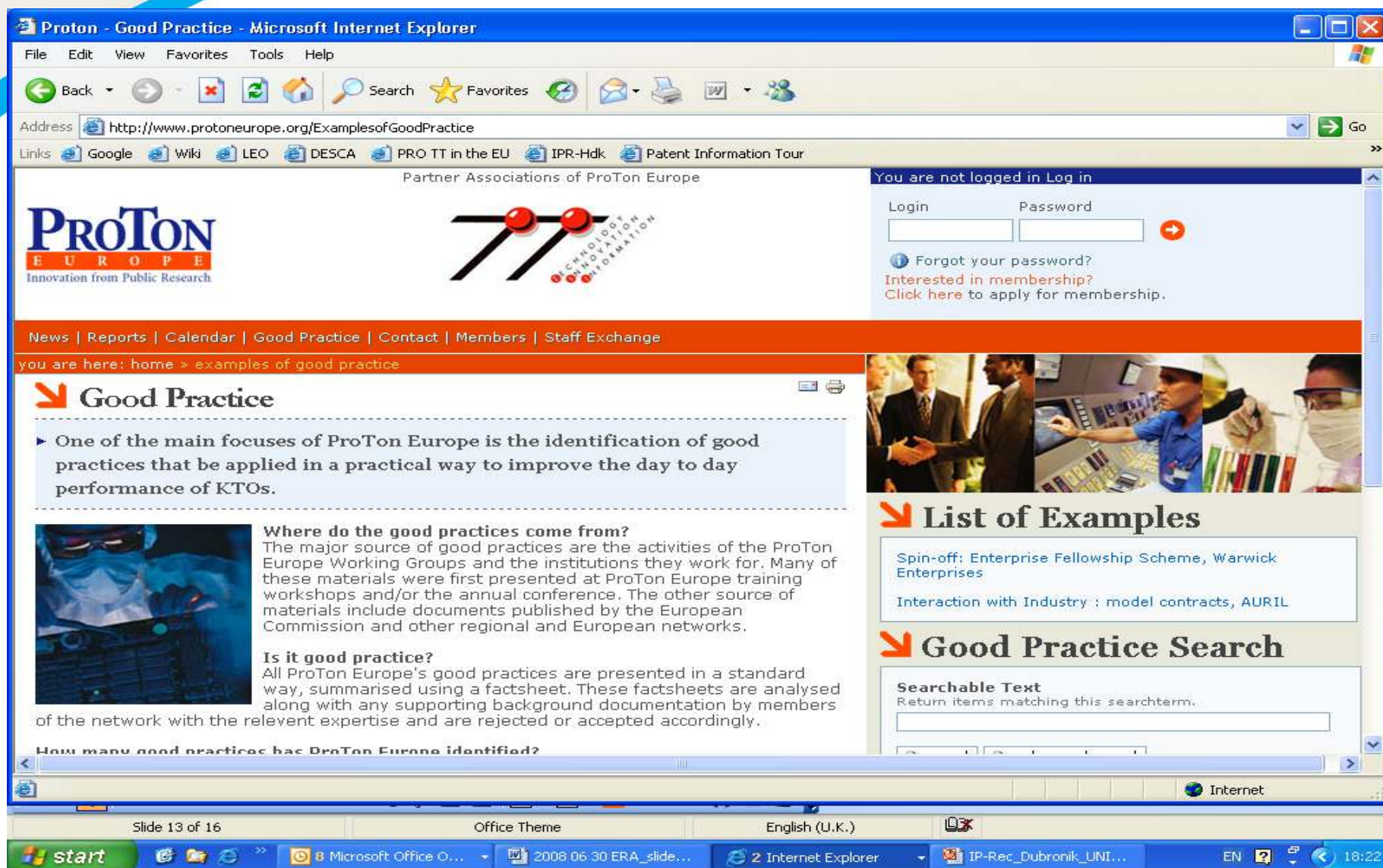
**IMPORTANT NOTICE: This summary is a guide only for information purposes and does not constitute legal or other advice. Please consult your legal advisor for specific legal advice, if required.**

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Click here to begin

Internet 100%

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Proton - Good Practice - Microsoft Internet Explorer

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Address <http://www.protoneurope.org/ExamplesofGoodPractice> Go

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Partner Associations of ProTon Europe

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you are here: home > examples of good practice

## Good Practice

▶ One of the main focuses of ProTon Europe is the identification of good practices that be applied in a practical way to improve the day to day performance of KTOs.

**Where do the good practices come from?**  
The major source of good practices are the activities of the ProTon Europe Working Groups and the institutions they work for. Many of these materials were first presented at ProTon Europe training workshops and/or the annual conference. The other source of materials include documents published by the European Commission and other regional and European networks.

**Is it good practice?**  
All ProTon Europe's good practices are presented in a standard way, summarised using a factsheet. These factsheets are analysed along with any supporting background documentation by members of the network with the relevent expertise and are rejected or accepted accordingly.

How many good practices has ProTon Europe identified?

## List of Examples

Spin-off: Enterprise Fellowship Scheme, Warwick Enterprises

Interaction with Industry : model contracts, AURIL

## Good Practice Search

**Searchable Text**  
Return items matching this searchterm.

Internet

Slide 13 of 16 Office Theme English (U.K.)

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EUROPEAN  
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# Next steps

## Council Resolution

INVITES **Member States to actively support the Recommendation, and to promote the effective take-up of the Code of Practice** by universities and other public research organisations, while fully respecting their autonomy in dealing with IPR;

CALLS UPON all **universities and other public research organisations to** pay due regard to the content of the Commission's Code of Practice and to **implement it** according to their specific circumstances, including appropriate flexibility for contract research

INVITES **Member States and the Commission to establish**, in **partnership**, light and effective governance arrangements, **including the monitoring and evaluation of the take up and impact** of the Recommendation and Code of Practice, on the basis of indicators, the exchange of best practices **with active involvement of stakeholders**, which could lead to the **definition of further guidelines** on specific issues of common interest where justified

# Knowledge transfer and IP management

## Next Steps

- Commission and Member States: **Working Group on knowledge transfer** under **CREST** to monitor and evaluate the take-up and impact of the Recommendation and Code of Practice; exchange best practices; develop guidelines
- Commission and Stakeholders: **Thematic Forum** on Knowledge Transfer to discuss implementation of the Code of Practice and exchange best practices; the forum will be supported by an expert group carrying out studies on different Knowledge Transfer issues (e.g. international aspects, model contracts).
- Member States and Stakeholder events: to discuss **national implementation** of Recommendation and Code of Practice, actions to develop national policies and guidelines
- Stakeholder events: to **disseminate Code of Practice**
- Member States will inform the Commission by July 2010 and every two years thereafter of measures taken on basis of the Recommendation.



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**Thank you  
for your attention!**



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