



**Raising public awareness of development issues and promoting
development education in the European Union (DEAR
programme)**

Reference: EuropeAid/173998/DH/ACT/Multi

Questions & Answers n° 4

Concept note phase

As set out in section 2.2.4 of the guidelines, to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities.



QUESTIONS	ANSWERS
<p>I would be grateful if you can clarify a point about lot 2.</p> <p>1) For what concerns EU partners that are in the consortium to support visibility, dissemination, and sustainability, working "transversally" but not implementing activities with direct beneficiaries, do we have to register them on Prospect?</p> <p>2) Do they count in the 4 Eu member states involved?</p> <p>1</p>	<p>1) All entities involved in the action need to be identified at concept note step (in Annex A.1) either as lead applicant, co-applicant, affiliated entity or associate/contractors, as defined in sections 2.1.1. and 2.1.2. of the guidelines.</p> <p>However, in PROSPECT under “co-applicants” tab, only co-applicant(s) and affiliated entity(ies) involved in the action must be listed. At the concept note step, the lead applicant has to insert the correct official name of the co-applicant/affiliated entity organisation(s) and country of establishment but registration in PADOR (or the PADOR off line form) is not mandatory at this step. Please also refer to the answer to question 28 of Q&A 2 published on 28/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p> <p>Please note that co-applicants and affiliated entities must be registered in PADOR at the full application step (at concept note step it is obligatory only for lead applicants) and their EuropeAid ID must be mentioned in the application in PROSPECT (see section 2.2 of the guidelines). If it is impossible to register online in PADOR for technical reasons, lead applicants, co-applicants and/or affiliated entity(ies) must complete the ‘PADOR registration form’ (Annex F) attached to these guidelines. This form must be sent together with the full application, by the submission deadline (see section 2.2.5. of the guidelines).</p> <p>2) Please note that for Lot 2, Lot 4 and Lot 5, actions must take place in a minimum of 4 EU Member States. There is no obligation to have co-applicants from all the countries. It is up to the lead applicant to use the most suitable forms (for example through a co-applicant/affiliated entity in the targeted country or financial support to third parties) to engage with citizens in the targeted countries.</p>



<p>2</p>	<p>We would like to have more clarification on the Concept Note (Annex A.1), more concrete on the EU contribution in relation to the eligible costs of the action.</p> <p>We were wondering if this detail is only mentioned in page 7 (see below), or do we need to send any other document with this information?</p> <table border="1" data-bbox="295 572 1064 743"> <tr> <td>Requested EU contribution (amount)</td> </tr> <tr> <td>Requested EU contribution as a percentage of the total eligible costs of the action (indicative)</td> </tr> </table>	Requested EU contribution (amount)	Requested EU contribution as a percentage of the total eligible costs of the action (indicative)	<p>The requested EU contribution amount as well as the requested EU contribution as % of total eligible costs need to be encoded in PROSPECT at concept note step (and full application) and specified in the budget of the action (Annex B to the guidelines)</p> <p>Section 1.5. 'Project details' of Annex A.1 Grant application form concept note needs to be deleted as applying via PROSPECT is mandatory for this call for proposals. Please also refer to question no. 7 of Q&A no. 3 published on 31/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
Requested EU contribution (amount)				
Requested EU contribution as a percentage of the total eligible costs of the action (indicative)				
<p>3</p>	<p>Many thanks for answering the question we asked (Here it is again: The Call is focusing on youth engagement and youth are defined as people between 15 and 30 years old. As lot 4 is focusing on formal education settings we would like to know if it is possible to involve pupils from the primary cycle, therefore children between 6 – 13 years old).</p> <p>Although your answer speaks of "any other group involved in life-long and life-wide learning" it is still not absolutely clear whether your target group in Lot 4 regarding formal education is only for students 15 years and above?</p> <p>Within the scope of this CfPs, are Primary School pupils not considered a target groups to work with on development education in schools?</p>	<p>Please refer to the reply to question 17 of the Q&A no.1 published on 17/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>		
<p>4</p>	<p>We would like to express our concerns, however, about the changes introduced in section 2.1.3, on the number of applications and grants</p>	<p>We understand your concern, but unfortunately PROSPECT does not allow for any other way to avoid this problem.</p>		



	<p>per applicants or affiliated entities, and the rejection of any proposal including a co-applicant or affiliated entity that is already present in another proposal submitted earlier in time.</p> <p>While we acknowledge that it is the lead applicant’s responsibility to verify this, an automatic rejection of any proposal containing an entity that is already present in another proposal under the same lot puts in serious risk the partnership spirit that defines this programme. It can easily be the case that, while acting in good faith, many small organisations (even from EU candidate countries) are not aware of this limitation, and try to engage in several applications, hence leading to large proposals being rejected because of an unintended error.</p> <p>We would like to propose that, when such cases happen, the evaluation team does not only consider the submission date and hour, but that in can give the lead applicants the possibility to amend this error within a reasonable timeframe.</p>	<p>Please refer also to the reply to question 15 of the Minutes of the Information session published on 12/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
5	<p>Lot 3 – nature of subgrantees</p> <ol style="list-style-type: none"> 1. If a network is co-applicant in our DEAR project, can a CSO member of this network (which has its own legal entity) be a subgrantee of our project? (CSO – potential subgrantee- does not have consolidated accounts with the network and do not have network membership in its statute but pay a network membership fee). 2. Can a CSO that participates in the same campaign with a co-applicant be beneficiary of financial support? (CSO does not have consolidated accounts with the campaign and do not have campaign membership fee nor in its statute). 3. If a non formal organisation could be recipient of subgrant, how we can guarantee the correct use of funds? 	<p>As set out in section 2.2.4 of the guidelines, to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants and affiliated entity(ies).</p> <p>1) As described in section 2.1.3. (g) of the guidelines, third parties eligible for financial support must: be neither a beneficiary of a grant (neither lead, nor co-applicant, or affiliated entity) nor associates or contractors in the frame of this call for proposals.</p> <p>Annex X to the guidelines states that for Lot 3 and Lot 5 option c, third parties eligible for financial support must not be:</p> <ul style="list-style-type: none"> • a beneficiary of a grant (neither lead applicant, nor co-applicant), • an affiliated entity, • associates and contractors



	<p>We underline as in case of restriction to participation that the power of the network to activate the project action in a widespread manner would be significantly reduced.</p> <p>4. Is admissible co-funding from subgrantees as a minor portion of cofounding of the project?</p> <p>Lot 3 – capacity building</p> <p>5. Are the capacity building (tutoring, networking, trainings, etc.) actions for subgrantees considered part of the financial support for third parties, so included as “main purpose of the project”?</p> <p>Intervention Logic</p> <p>6. Are admissible Intermediary Outcomes? Is correct include them in Outcomes/Specific Objectives Section?</p>	<p>As long as the organisations (even if they are members of a family organisation or network) are distinct legal entities, proven on the basis of their statutes or establishment acts and meet the eligibility requirements defined for third parties, they can receive financial support.</p> <p>2) Please refer to the reply to sub-question 1 above.</p> <p>3) Indeed, for all lots the third party which may receive financial support must be a legal person or an entity without legal personality.</p> <p>In case of lot 3 and lot 5 option c, please refer to Annex X of the Guidelines which states: <i>“The coordinator (lead applicant) shall assume the financial responsibility for the management of the EU funds in compliance with the contract. There is no contractual link between the EC and the third party. Therefore, the beneficiary shall set up a system of control of third party activities and costs.”</i></p> <p>(...)</p> <p><i>The auditor selected by the beneficiary shall verify the eligibility of the costs incurred by the third party. It is advisable that the beneficiary agrees with the auditor on the supporting documents necessary to verify the eligibility of costs incurred by third parties.”</i></p> <p>The adequate and accepted method and level of auditing is the sole responsibility of the lead applicant and the independent auditor to establish and certify. Please also refer to Annex VII of Standard Grant Contract (Annex G of the Guidelines) for more details about an expenditure verification of a grant contract.</p> <p>For all lots, the set-up of the control system to verify the eligibility of costs needs to be described in Section 2.1.1. of Annex A.2 (Grant application form – Full application).</p> <p>4) In line with the Practical Guide PRAG 6.3.9 <i>“The co-financing may take the form of the beneficiary's own resources (self-financing), income generated by the action and financial or in kind contributions from third parties.”</i></p> <p>The coordinator has to declare the co-financing actually provided in the final report, but no evidence is needed.</p>
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		<p>5) Please note that for the purpose of this call for proposals contributions in kind – meaning the provision of goods or services to beneficiaries or affiliated entities free of charge by a third party – may not be treated as co-financing.</p> <p>6) Older versions of the logical framework (PRAG 2016) indeed foresaw Intermediary Outcomes, whereas the current Practical Guide PRAG and the current template of the logical framework no longer foresee them.</p>
6	<p>we would like to ask what is request in the paragraph 1.3.1 point (iii) – (Describe which of the expected results referred to in the guidelines for applicants will be addressed).</p> <p>In this section we have to describe the expected outputs of the project? In the Guidelines the “expected results” are not mentioned.</p>	<p>Please refer to the reply to question 7(3) of Q&A no.3 published on 31/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
7	<ol style="list-style-type: none"> 1. Can universities be recipients of grants from an FSTP scheme? 2. Can associates be recipients of grants from an FSTP scheme? 3. Can you give provide some more details on and examples of what you interpret as ‘...population segments less sensitive to and less involved with global challenges’? 	<p>1) and 2) The nature of third parties which may receive financial support is described in detail in section 2.1.3.(g) of the guidelines, and specifically for lot 3 and lot 5 type of action c, details are provided in Annex X. Both documents outline that third parties eligible for financial support must be neither a beneficiary of a grant (neither lead, nor co-applicant, or affiliated entity) nor associates or contractors in the frame of this call for proposals</p> <p>This means that for all lots, associates or contractors in the frame of this call for proposals are not eligible for financial support to third parties. Please also refer to the reply to question 5 above.</p> <p>3) Please refer to the information referred to in the following paragraph in section 1.1.1. p.4 of the guidelines: “While a large majority of EU citizens are convinced of the necessity of EU development cooperation¹, only around half of them take action</p>

¹ Eurobarometer 512 “EU citizens and development cooperation” published April 2021



		<i>themselves. Many are not aware of their potential role and responsibility as citizens, voters and consumers².</i>
8	<p>For Lot 1, the guidelines indicate that the requested grant must fall between the following min. and max. of total eligible costs: Minimum 5 Mio – Maximum 10 Mio.</p> <p>Is the margin for the total eligible costs indeed EUR 5-10 Million (meaning the contribution requested from the EC cannot be up to EUR 10 Million)?</p> <p>Or is this a slight error in formulation and what is meant is that the grant size (= the EU contribution to the total eligible costs of the Action) can be between EUR 5 Mio and EUR 10 Mio?</p>	<p>See reply to question 17 of Q&A no.2 published on 28/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
9	<p>Could you please clarify if by 'grant requested' you mean the total EC contribution?</p> <p>To elaborate the question:</p> <p>If I am applying under LOT 1, does the total budget of the project need to be up to EUR 10.000.000 or can I submit a total budget that includes up to EUR 10.000.000 as EC contribution, plus co-financing of the remaining 10%?</p>	<p>See reply to question 17 of Q&A no.2 published on 28/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
10	<p>I noticed that responses to questions sent regarding the DEAR call have been responded to in a document uploaded on the call website last week. However, the question that I sent on the 5th of October (see below) is not on this list.</p>	<p>The answers to questions received in the functional mailbox of this call for proposal are published in batches as needs arise. The following questions and answers document were published on the website of the call:</p> <p>“Minutes of the virtual information session” (published on 12/10/2022) “Questions and Answers no.1” (published on 17/10/2022) “Questions and Answers no.2” (published on 28/10/2022)</p>

² Eurobarometer 455 “EU Citizens’ views on development, cooperation and aid” published in April 2017



	<p>Will there be a part 2 of the Questions and Answers document? I would really appreciate if this question regarding the budget could be clarified clearly, as it is very difficult to understand without any doubt from the formulation in the Call guidelines.</p>	<p>“Questions and Answers no.3” (published on 31/10/2022) “Questions and Answers no.4” (published on 31/10/2022).</p>
<p>11</p>	<p>1) For Lot 4, we need a letter of support from a competent education authority. In some countries, the competent authority is the Ministry of education. In more decentralized education systems, e.g. Italy, it is the local authority or municipality. Is it ok that the declaration supporting the project is from a local authority or municipality?</p> <p>2) Can a Ministry of Education, or Local education authority be a formal co-applicant in Lot 4?</p> <p>3) Can a project for Lot 4, have 4 countries focusing on formal education (and meet the minimum requirements of at least 4 with support from Ministries) and have another 2-3 partners from other countries who will have a differentiated role and focus more on informal education, dissemination, and expertise provision.</p>	<p>1) See Q&A no.3 published on 31/10/2022 and in particular question 9 answer 1. 2) See Q&A no.3 published on 31/10/2022 and in particular question 9 answer 2. 3) See Q&A no.3 published on 31/10/2022 and in particular question 9 answer 4.</p>
<p>12</p>	<p>I would like to ask for clarification about the component of Financial Support to Third Parties in LOT n. 2.</p> <p>The Guidelines mention that “actions featuring financial support to third parties are encouraged”. I would like to know:</p> <ul style="list-style-type: none"> - is there a maximum % of total project costs allocated to the financial support? 	<p>See reply to question 13(2) of Q&A no.3 published on 31/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>



	<p>- the financial support may be the main financial component (i.e. more than 50% of the budget)?</p>	
<p>13</p>	<p>1. Section 2.1.3, paragraph e types of action: can you confirm public opinion research could be considered?</p> <p>2. Is there a minimum yearly turnover the lead applicant must demonstrate to be eligible for the selection process? I'd for a EUR 5 million proposal.</p> <p>3. Under Lot n° 1, could we have a 3rd co-applicant located in the same country as the lead applicant?</p> <p>4. Among advocacy activities under lot n° 1, could we consider mobilizing Members of Parliaments?</p> <p>5. Could an organization gathering MPs be eligible as co-applicant?</p>	<p>1) As set out in section 2.2.4 of the guidelines, to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of an action or specific activities.</p> <p>2) The guidelines do not foresee a minimum yearly turnover. The financial capacity (“stable and sufficient sources of finance”) will be assessed under Section 1 of the Full application Evaluation Grid (see Section 2.3 of Guidelines for grant applicants). See also reply to question 35 of the minutes of the virtual information session published on 12/10/2022 on the website of the call.</p> <p>3) Please refer to the section 2.1.1. of the guidelines: Except for Lot 2, these 2 co-applicants must each be established in a EU Member State different from the lead applicant and different from the other co-applicant. The other co-applicants, if any, can be established in any EU Member State or a country or territory, as defined in Annex M.</p> <p>4) Yes, this can be considered.</p> <p>5) As set out in section 2.2.4 of the guidelines, to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants and affiliated entity(ies).</p>
<p>14</p>	<p>I am contacting you as I have two questions concerning Lot 4.</p> <p>1) On p. 9 of the "guidelines for grants applicants" document, it is written that: Actions operating with or targeting the formal education system must be approved by the relevant educational authorities.</p>	<p>1) See Q&A no.3 published on 31/10/2022 and in particular question 9 answer 1.</p> <p>2) See Q&A no.3 published on 31/10/2022 and in particular question 15 answer 2.2.</p>



	<p>However, no definition of “relevant educational authorities” is provided. Do you refer to the authorities of the involved education organisations/institutions (e.g. school leaders, deans, etc.) or more to authorities at the ministry level? It would be helpful if you could give us a more detailed definition.</p> <p>2) Moreover, could you please give us more details concerning the required signed declaration by the relevant educational authorities? Should it be an agreement signed by both parties? Or should it be a simple declaration letter signed by the authorities?</p>	
15	<p>The instructions section for the concept note template, page 10, point 1.3.1.iii, states: “Describe which of the expected results referred to in the guidelines for applicants will be addressed.” The guidelines, however, do not make an explicit mention to expected results of the CfP. What are the expected results that this point refers to?</p>	<p>Please refer to the reply to question 7(3) of Q&A no.3ii and iii published on 31/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
16	<p>I would like to have a clarification concerning the co-funding of the project. In case we launch a sub granting scheme (financial support to third parties), would it be possible to ask to the sub-grantees to co-fund their project and use it as a co-funding for our project?</p> <p>Does the same rule apply to all the LOTS?</p>	<p>In line with the Practical Guide PRAG section 6.3.9. “<i>The co-financing may take the form of the beneficiary's own resources (self-financing), income generated by the action and financial or in kind contributions from third parties.</i>”</p> <p>The EU contribution represents a percentage of the total eligible costs of the project and that the amount of co-financing is not allocated to a specific action or item of the project. The beneficiary has to declare the co-financing actually provided in the final report.</p> <p>You might foresee co-financing for the financial support to third parties (FSTP) projects, but please be aware that the entities receiving FSTP and the exact amounts might not be known yet at Concept Note step, whereas you already need to clearly identify co-financing of the entire action in the budget, tab 3 – expected sources of funding.</p>



<p>17</p>	<p>Based on the eligibility guidelines of this call, it looks that our organization would be eligible to be a co-applicant, as according to the eligibility guidelines, entities without a legal personality are eligible as co-applicants.</p> <p>I see the details of the eligibility guidelines here on page 6 of the EU Funding & Tenders Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment to demonstrate the ability to undertake contracts. What documents are necessary to demonstrate our ability to undertake contracts, but also to satisfy the second condition?-- the "existence of a patrimony/asset/capital separated from its members/owners" and "rules ensuring that creditors can reply on this patrimony/asset/capital and that, in case of liquidation/insolvency, creditors are reimbursed in advance (prior to the repartition of the patrimony/asset/capital between the owners/members.</p> <p>Our organization manages our grants and contracts through a service provider in Switzerland, called XXX. Attached is a copy of the signed contract with XXX for our financial management and contracts management. Perhaps this document would be evidence?</p>	<p>On entities without legal personality, please refer to our reply to question 13 of Q&A no.3 published on 31/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p> <p>This call for proposals will be managed via PROSPECT. The guidelines of the EU Funding & Tenders Rules are applicable to calls for proposals managed via the E-Grants system. For this call for proposal, the administrative/eligibility checks as well as the financial capacity assessment will be done by the Evaluation Committee. Please refer to section 2.2.5 of the guidelines which specify that for the purpose of the evaluation of the financial capacity the lead applicant must provide an audit report as well as a copy of the lead applicant’s latest accounts.</p>
<p>18</p>	<p>I would like to ask for confirmation about the EuropeAid ID. The Guidelines state that: “co-applicants and affiliated entities must register in PADOR at the full application step”, and that it’s through PADOR that they can “get a unique ID (EuropeAid ID)”.</p> <p>Could you please confirm that co-applicants and affiliated entities are not required to include the EuropeAid ID in the concept note application form?</p>	<p>Your understanding is correct. However, please note that all co-applicants and affiliated entities involved in the action must be listed under the “co-applicant” tab in PROSPECT at concept note step. If they are not registered yet in PADOR and therefore do not have the EuropeAid ID yet, the lead applicant still has to insert the correct official name of the organisation and place of establishment.</p> <p>See answer to question 1 above as well as answer to question 28 of Q&A no.2 published on 28/10/2022 on the website of the call.</p>



<p>19</p>	<p>My question is about the eligibility criteria for co-applicants. It is not clear to me whether the distinction between lot 1-4 on the one hand (CSOs) and lot 5 on the other hand (LAs) also applies to the co-applicants, or not.</p> <p>On page 14 (of 42) the guidelines say “Co-applicants must satisfy the eligibility criteria as applicable to the lead applicant himself”. For lot 5 that would mean: only local authorities and associations of local authorities. But then the text continues: “In addition (...) the following are, however, also eligible: (...)”. And then it mentions CSOs and associations of CSOs, local authorities and associations of LAs, without making the distinction between lot 1-4 and lot 5. Can CSOs be co-applicants under lot 5 and LAs be co-applicants under lot 1-4 ?</p>	<p>1) The eligibility criteria (2.1.1. Eligibility of applicants (i.e. lead applicant and co-applicant(s)) (see p. 12 of the guidelines) define the following: <i>Lead applicant:</i> <i>(1) Under Lot 1, 2, 3 and 4, in order to be eligible for a grant, the lead applicant must:</i> <input type="checkbox"/> <i>be a Civil Society Organisation (CSO) or an association of CSOs and</i> <i>(2) Under lot 5, in order to be eligible for a grant, the lead applicant must:</i> <input type="checkbox"/> <i>be a Local Authority (LA) from a Member State of the European Union, constituted in accordance with the legislation in force in the country, or Associations of Local Authorities (ALA) registered in a Member State of the European Union.</i> For co-applicants, no distinction between lots is made.</p> <p>Please also refer to the reply to question 23 of the Q&A no.2 published on 28/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>
<p>20</p>	<p>1. Is a 100% non-profit public institution, founded by a municipality, co-financed by that municipality, and with that municipality as the main decision-maker, eligible as co-applicant under lot 5?</p> <p>2. If not, can that municipality be the co-applicant and delegate its role to this public institution?</p>	<p>1) and 2) As set out in section 2.2.4 of the guidelines, to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants and affiliated entity(ies).</p>
<p>21</p>	<p>We will submit a Concept Note under Lot 5 and focus on type a). Nevertheless, we would like to include elements of the other types (b–d) as well. We will also target our activities to young people (type b), offer a small financial support to LAs and initiatives (type c) as well as develop educational materials and units. The activities complement each other and support the goals we want to achieve through the project.</p>	<p>For all lots, it is understood that the action proposed will focus on the objectives outlined for the particular lot but may include elements foreseen under other lots. Please also refer to the Minutes from the virtual Information Session and in particular the reply to question 8 published on 12/10/2022 on the website of the call: https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?do=publi.welcome&nbPubliList=15&orderby=upd&orderbyad=Desc&searchtype=RS&aofr=173998</p>



	Is there anything to the contrary, or do you see an exclusion here?	
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