

**Report for:** Record of Decision Taken Under Delegated Authority

**Item number:**

**Title:** 318 Permanent Bus Stop

**Report  
Authorised by:** Head of Operations



**Cabinet Lead Member for Environment:**



**Lead Officer:** Gary Smith  
Tel: 020 8489 5609  
Email: [gary.smith@haringey.gov.uk](mailto:gary.smith@haringey.gov.uk)

**Ward(s) affected:** Tottenham Hale

**Report for Key/  
Non Key Decision:**

1. Describe the issue under consideration
  - 1.1 To report on the feedback of public consultation carried out between 26<sup>th</sup> April and 18<sup>th</sup> May 2017 on proposals to install permanent accessible bus stops on the 318 bus route.
  - 1.2 To request approval to proceed to implementation having taken objections into consideration.
2. Recommendations
  - 2.1 In view of majority support for the scheme proposals, it is recommended that we proceed to implementation of the scheme as proposed.
3. Reasons for decision
  - 3.1 Haringey is required to formally consider the results of feedback to consultations undertaken on traffic schemes, in particular any objections to proposals prior to proceeding to implementation.
4. Alternative options considered
  - 4.1 None
5. Background information
  - 5.1 Following complaints of poor bus stop accessibility on the 318 'hail & ride' route, we are working with Transport for London (TfL) to install 6 permanent (fixed) bus stops along the route. The Government's policies on integrated transport, the Mayor's Strategy and the Disability Discrimination Act 1995 requires consideration to be given to the needs of different user groups.

Fixed bus stops have been found to offer more benefits for passengers, these benefits include:

- Clear information – fixed stops make sure you know where you can get the bus to and from. The fixed bus stop posts allow TfL to display posters and journey time information. This enables better communication about journeys, allowing TfL to notify people of any changes well in advance;
- Improved accessibility – we are proposing to create fully accessible bus stops, minimizing step heights and enabling deployment of ramps, for wheelchair users; and
- A more reliable journey – currently the 318 can potentially be stopped numerous times along this short stretch of the route. This means the service is prone to disruption. Fixed stops would improve punctuality and allow for more accurately prediction of journey times.

## 6 Statutory Consultation

- 6.1 Local ward Councillors were informed of the proposals on the 20<sup>th</sup> April 2017. No objections were received from Councillors.
- 6.2 The public consultation was conducted between 26<sup>th</sup> April – 18<sup>th</sup> May 2017, a copy of the consultation document is attached in Appendix A of this report.
- 6.3 Following positive consultation results a statutory Traffic Management Order consultation was undertaken between 21<sup>st</sup> August and 8<sup>th</sup> September 2017. No objections were received.

## 7 Responses to Consultation

- 7.1 The full consultation report is available in appendix B. The table below sets out the summary position.

| View       | Consultation Area |     |
|------------|-------------------|-----|
|            | Count             | %   |
| Support    | 20                | 61% |
| Object     | 7                 | 21% |
| Other View | 6                 | 18% |

There is majority support (61%) from respondents within the consultation area.

- 7.2 There were 7 objections received to the consultation, we have provided responses to these in the table below:

| Overall Support / Object | Comment  | Response  |
|--------------------------|--|---|
| Object                   | Cannot understand the colour code on your map for Dowsett Rd. I hope it's not car club the nearest colour. Also why are there no speed humps in Dowsett Rd? Another problem is people parking in Dowsett Rd during event days - including vans, pick-up trucks, and other work vehicles. | The colour coding on the proposal plan for Dowsett Road is indicative of the existing layout. There are no changes to the existing car club bays or other parking arrangements. The introduction of speed humps is outside the scope of this scheme. Other comments are about general driver behaviour which is not pertinent to this consultation. |
| Object                   | I'm fed up with people waiting outside my house for the bus. They lean against my wall, drop litter and stare into my house.   | Currently many bus passengers hail the bus from outside this residents house. The new proposed stop is about 150m from their property, therefore their issues will be resolved by the new proposals.  |

|        |   |  |
|--------|---|--|
| Object | 6 fixed stops is not enough because they are too far apart and this will be difficult for some users. Previously the hail & ride was stopped on Havelock Rd but was reinstated after extensive protest. Please either leave the route as it is, or have more than 6 stops.  | The spacing between bus stops satisfies London Buses recommended distances. and were agreed by London Buses to meet there operational requirements. The need and viability for further stops will be assessed when the stops are operational.  |
| Object | I'm NOT in favour of the fully accessible bus stops but only because I don't believe the buses are best served on these single lane roads. My recommendation would be:- Either the buses use double lane roads (A1010 High Road - Lansdowne Road - Lordship lane, etc) and avoids all single lane streets or - The single lane streets currently used by the 318 and all surrounding single lane streets become ONE WAY streets, avoiding opposing traffic using the same single lanes. As a driver myself and living on Seymour Avenue, I would be greatly in favour of all these little single lane streets becoming one way in order to avoid these "Mexican standoffs" and unnecessary jams, thus allowing the 318 to travel smoothly and for the installation of the fully accessible bus stops. | This is a suggestion to completely re-route the 318 bus which is outside the scope of this scheme. The new bus stops will improve traffic flow along these roads by providing passing places.  |
| Object | Why change the current permanent stop? Save the money for something else. This would cause terrible congestion in Halefield near the school access road   | <p>We have found that fixed bus stops offer more benefits for passengers and these benefits include:</p> <ul style="list-style-type: none"> <li>• Clear information – fixed stops make sure you know where you can get the bus to and from. The fixed bus stop posts allow TfL to display posters and journey time information. This enables better communication about journeys, allowing TfL to notify people of any changes well in advance.</li> <li>• Improved accessibility – we are proposing to create fully accessible bus stops. minimizing step heights and enabling deployment of ramps, for wheelchair users.</li> <li>• A more reliable journey – currently the 318 can potentially be stopped numerous times along this short stretch of the route. This means the service is prone to disruption. Fixed stops would improve punctuality</li> </ul> |

|        |   |  |
|--------|---|--|
|        |   | and allow more accurate prediction of journey times.<br><br>There is also now a responsibility on both bus operators and local authorities to provide safe, accessible boarding and alighting points that meet accessibility standards for all bus passengers, as set out in the original Disability Discrimination Act. |
| Object | The stops on Shelbourne currently make sense because they don't block traffic joining the road and don't take up resident parking space; so I object to the proposals for Shelbourne Rd | The current bus flag locations in Shelbourn Road do not support accessible stops because of the position of existing dropped kerbs. The new locations were chosen to minimise the reduction of residents parking spaces.   |
| Object | (No reason given)   | Not applicable   |

7.2 There were a number of additional comments from respondents expressing a wish for more stops in the area. As a result we will review the operation with TfL once the stops are operational.

## 8 Contribution to strategic outcomes

8.1 The project proposals will improve road safety contributing to the delivery of Haringey's Corporate Plan Priority 3, "A clean, well maintained and safe borough where people are proud to live."

9 Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

### 9.1 Comments of the Head of Legal Services

N/A

### 9.2 Chief Finance Officer Comments

The cost of these works can be contained within the existing budget funded from Transport for London LIP allocation"

### 9.3 Equal Opportunities



The consultation documents were distributed to all households / businesses within the agreed consultation area and also placed on the Councils web-site to ensure that all stakeholders were made aware of the Councils proposals.

**9.4 Staff Side Comments**

N/A

**10 Summary and Response**

**10.1 The scheme proposals have achieved majority support (61%) from respondents within the consultation area.**

**10.2 The main objections came from people who would like to keep the status quo, however there is also now a responsibility on both bus operators and local authorities to provide safe, accessible boarding and alighting points that meet accessibility standards for all bus passengers, as set out in the original Disability Discrimination Act. The proposals will also improve the reliability of the bus route.**

**11. Use of Appendices**

- Appendix A – Consultation letter
- Appendix B – Consultation Report
- Appendix C – Amended Proposals

**12. Local Government (Access to Information) Act 1985**

N/A

**Appendix A**  
**Consultation Letter and area**

26/04/2017

## Statutory Notification

### Permanent Accessible Stops on the 318 Bus Route

Dear Resident or Business,

Following complaints of poor bus stop accessibility on the 318 'hail & ride' route, we are working with Transport for London (TfL) to install 6 permanent (fixed) bus stops along the route.

We have found that fixed bus stops offer more benefits for passengers and these benefits include:

- Clear information – fixed stops make sure you know where you can get the bus to and from. The fixed bus stop posts allow TfL to display posters and journey time information. This could then be used to help notify people in advance if there are any changes or diversions expected.
- Improved accessibility – we are proposing to create fully accessible bus stops. Minimizing step heights and enabling deployment of ramps.
- A more reliable journey – currently the 318 can potentially be stopped numerous times along this short stretch of the route. This means the service is prone to disruption. Fixed stops would improve punctuality and allow us to more accurately predict the journey time.

There is also now a responsibility on both bus operators and local authorities to provide safe, accessible boarding and alighting points that meet accessibility standards for all bus passengers, as set out in the original Disability Discrimination Act.

We have identified suitable locations, to ensure that where passengers board and alight; the fixed stops are accessible and not obstructed by parked vehicles, which will also improve road safety for all road users. We have also worked to minimise any loss of on-street parking space.

Sustainable Transport  
Level 5 Alexandra  
House  
10 Station Road, Wood  
Green  
London N22 7TR

020 8489 1000

[www.haringey.gov.uk](http://www.haringey.gov.uk)



The proposed new fixed bus stop locations are shown on the attached plan.

This notification letter marks the start of a three week period during which we welcome all comments and representations using the enclosed prepaid feedback card. Alternatively you can email us at [frontline.consultation@haringey.gov.uk](mailto:frontline.consultation@haringey.gov.uk).

Please write '318 Bus Stops' in the title line of your card or email and ensure that your comments reach us no later than 18 May 2017. If you wish to object to the proposals please give reasons for your view.

Your feedback will enable us to decide if we should go ahead with the scheme as planned, or if changes are required. Thank you for your interest and I look forward to hearing from you.

Yours faithfully

A handwritten signature in blue ink, appearing to be a stylized name, possibly 'L. Smith'.

Sustainable Transport. Highways Engineering



**Appendix B**  
**Consultation Response Report**

31 May 2017

## Consultation Analysis Report

### Statutory Notification

# Permanent Accessible Stops on the 318 Bus Route

A statutory notification letter dated 26 April 2017 was circulated to local residents and businesses to propose replacing hail and ride bus stops on Route 318 with fixed bus stops

### Analysis

|                   |            | Count | %    |
|-------------------|------------|-------|------|
| Support or object | Support    | 20    | 61%  |
|                   | Object     | 7     | 21%  |
|                   | Other view | 6     | 18%  |
|                   | Total      | 33    | 100% |

Level 5 Alexandra House  
10 Station Road, Wood Green  
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|      |                 | Support or object |            |            |
|------|-----------------|-------------------|------------|------------|
|      |                 | Support           | Object     | Other view |
|      |                 | Row %             | Row %      | Row %      |
| Road | Dowsett Rd      | 83%               | 17%        | 0%         |
|      | Hanbury Rd      | 40%               | 0%         | 60%        |
|      | Havelock Rd     | 0%                | 50%        | 50%        |
|      | Rosebery Ave    | 50%               | 50%        | 0%         |
|      | Seymour Ave     | 80%               | 20%        | 0%         |
|      | Shelbourne Rd   | 71%               | 29%        | 0%         |
|      | Sherringham Ave | 50%               | 0%         | 50%        |
|      | <b>Total</b>    | <b>61%</b>        | <b>21%</b> | <b>18%</b> |

| Card no | Road       | Support or object | Comments  |
|---------|------------|-------------------|---|
| 1       | Dowsett Rd | Support           |   |
| 19      | Dowsett Rd | Support           |   |
| 8       | Dowsett Rd | Support           |   |
| 22      | Dowsett Rd | Support           |   |
| 11      | Dowsett Rd | Support           |   |
| 6       | Dowsett Rd | Object            | Cannot understand the colour code on your map for Dowsett Rd. I hope it's not car club the nearest colour. Also why are there no speed humps in Dowsett Rd? Another problem is people parking in Dowsett Rd during event days - including vans, pick-up trucks, and other work vehicles.  |
| 18      | Hanbury Rd | Support           | Support having permanent bus stops for 318 route  |
| 23      | Hanbury Rd | Support           | On your map, what are the "Green Boxes" with a cross, near to each proposed stop?   |
| 31      | Hanbury Rd | Other view        | To best serve the residents (majority are elderly & families with small children). You should consider 1 or 2 more stops in each direction. Especially to bring one back from the High Road to the beginning of Dowsett Rd after the Honeysett Rd where is the blind spot that people just sit at the kerb to drink. To revamp that area, put bus stop to help people with shopping to go home easier and do not obstruct the entrance of the Corner shop and hopefully be nice and clean as there always should be a bin right next to the bus stop. The distance between The bus stops in both directions should be reconsidered and more stops to be put up in the planned route |



|    |              |            |   |
|----|--------------|------------|---|
| 30 | Hanbury Rd   | Other view | Overall there needs to be increased traffic speed mitigation put in place alongside this proposal to make it beneficial to local residents who have to suffer noise disruption and pollution, and a wider plan to reduce the amount of traffic which use this route as a means of avoiding Watermead Way SEE FULL EMAIL   |
| 16 | Hanbury Rd   | Other view | Happy with permanent stops but the distance between them is too far for some. E.g. point C to A towards Stamford Hill is 2.5 times greater than points F to E in the same direction. I think you could add at least one more stop on your plan in each direction. Lots of residents are elderly or with young children. This needs to be taken into account if you are building accessible transport for residents here.  |
| 7  | Havelock Rd  | Object     | I'm fed up with people waiting outside my house for the bus. They lean against my wall, drop litter and stare into my house.  |
| 10 | Havelock Rd  | Other view | OK as long as stops are not too far apart as that would affect those with disability, elderly and mothers with small children. Some pavement areas should allow '2 wheels up' or similar so that buses have more room to manoeuvre and turn.  |
| 21 | Rosebery Ave | Support    | Fixed bus stops are easier and feel safer to access - especially at night. It's also more convenient.   |
| 17 | Rosebery Ave | Support    |   |
| 3  | Rosebery Ave | Object     | 6 fixed stops is not enough because they are too far apart and this will be difficult for some users. Previously the hail & ride was stopped on Havelock Rd but was reinstated after extensive protest. Please either leave the route as it is, or have more than 6 stops.  |
| 12 | Rosebery Ave | Object     | (No reason given)   |
| 29 | Seymour Ave  | Support    | Having been affected in the past when the 318 bus did not stop at all along the "hail and ride" section between the new proposed bus stop "A" and bus stops "F", it is a welcome that Haringey and TfL are working to install permanent bus stops along this section of the route. I support the proposed measures.   |
| 15 | Seymour Ave  | Support    | Can we have bus time displays and bus shelters  |
| 13 | Seymour Ave  | Support    | We live in Seymour and the bus stop in Ladysmith Rd is OK for us to go to and from North Middlesex hospital   |
| 2  | Seymour Ave  | Support    | Easier to travel to hospital  |
| 32 | Seymour Ave  | Object     | I'm NOT in favour of the fully accessible bus stops but only because I don't believe the buses are best served on these single lane roads. My recommendation would be:- Either the buses use double lane roads (A1010 High Road - Lansdowne Road - Lordship lane, etc) and avoids all single lane streets or - The single lane streets currently used by the 318 and all surrounding single lane streets become ONE WAY streets, avoiding opposing traffic using the same single lanes. As a driver myself and living on Seymour Avenue, I would be greatly in favour of all these little single lane streets becoming one way in order to avoid these "Mexican standoffs" and unnecessary jams, thus allowing the 318 to travel smoothly and for the installation of the fully accessible bus stops. |

|    |                 |            |  |
|----|-----------------|------------|--|
| 5  | Shelbourne Rd   | Support    |  |
| 25 | Shelbourne Rd   | Support    | Stricter penalties are needed against motorists who persist in parking by fixed bus stops  |
| 4  | Shelbourne Rd   | Support    |  |
| 27 | Shelbourne Rd   | Support    | Please make Shelbourne Rd easier for the buses. The road is used like a rat run - cars don't give way to 318 bus. The narrow road results in broken wing mirrors and cars being scraped.   |
| 33 | Shelbourne Rd   | Support    | We don't have a bus stop by the turning to Lansdowne Road; we are in between Chalgrove Rd and bottom of Shelbourne road bus stops. Would appreciate it if this could be looked into  |
| 24 | Shelbourne Rd   | Object     | Why change the current permanent stop? Save the money for something else. This would cause terrible congestion in Halefield near the school access road  |
| 9  | Shelbourne Rd   | Object     | The stops on Shelbourne currently make sense because they don't block traffic joining the road and don't take up resident parking space; so i object to the proposals for Shelbourne Rd  |
| 28 | Sherringham Ave | Support    | Doesn't go nearly far enough. Your rationale is false because buses already stop at the locations marked on the map. Accessibility problems only started when you allowed parking on both sides of the road. Before that, one side of the road was kept clear. At the very least, parking should not be allowed around the stops.  |
| 26 | Sherringham Ave | Support    | Unable to tell clearly from the enclosed map exactly where the permanent stops will be located   |
| 20 | Sherringham Ave | Other view | Your map is so very unclear and with small font. We agree with the letter. A lot of elderly people use the stop on the corner of Sherringham Avenue, so please can this be saved. It would be hard to make people walk further and we are all used to having the current 'stop'. From opposite Santander in the High Road there isn't another stop until the corner of Parkhurst Rd - which is a long walk for some. Please Please think of all elders and others who cannot walk far. |
| 14 | Sherringham Ave | Other view | This is a hospital route bus. Additional stops are needed (e.g have one at Dowsett Rd just off Park View Rd). There are not enough stops in Shelbourne and Rosebery roads. When we originally had the route it was well run by First Group. Now it's operated by Arriva and is unreliable - we don't know when buses will arrive or if they will stop. I partly support your proposal but more stops are needed.   |
| 33 | 33              | 33         | 33   |

**Appendix C**  
**Final Proposals**

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**NOTES:**

- Legend to be confirmed and set out with LHM engineer

Remove existing parking area and the heavy bituminous paved parking area of new parking level on 20mm thick sleep sand bed

Excavate to 100mm. Lay G7Y covered layer (100mm) below on 20mm sleep sand bed

Heavy walking lane with 150mm asphalt

Lay 150 grade kerbs to dropped curbing

Remove and tip existing kerbs

Formulate casting formwork to include full contingency construction

Bus stop flag pole for action under suspended traffic wires from T/L

Existing kerbs to be removed

New Bus Stop kerbing

Road markings to be removed

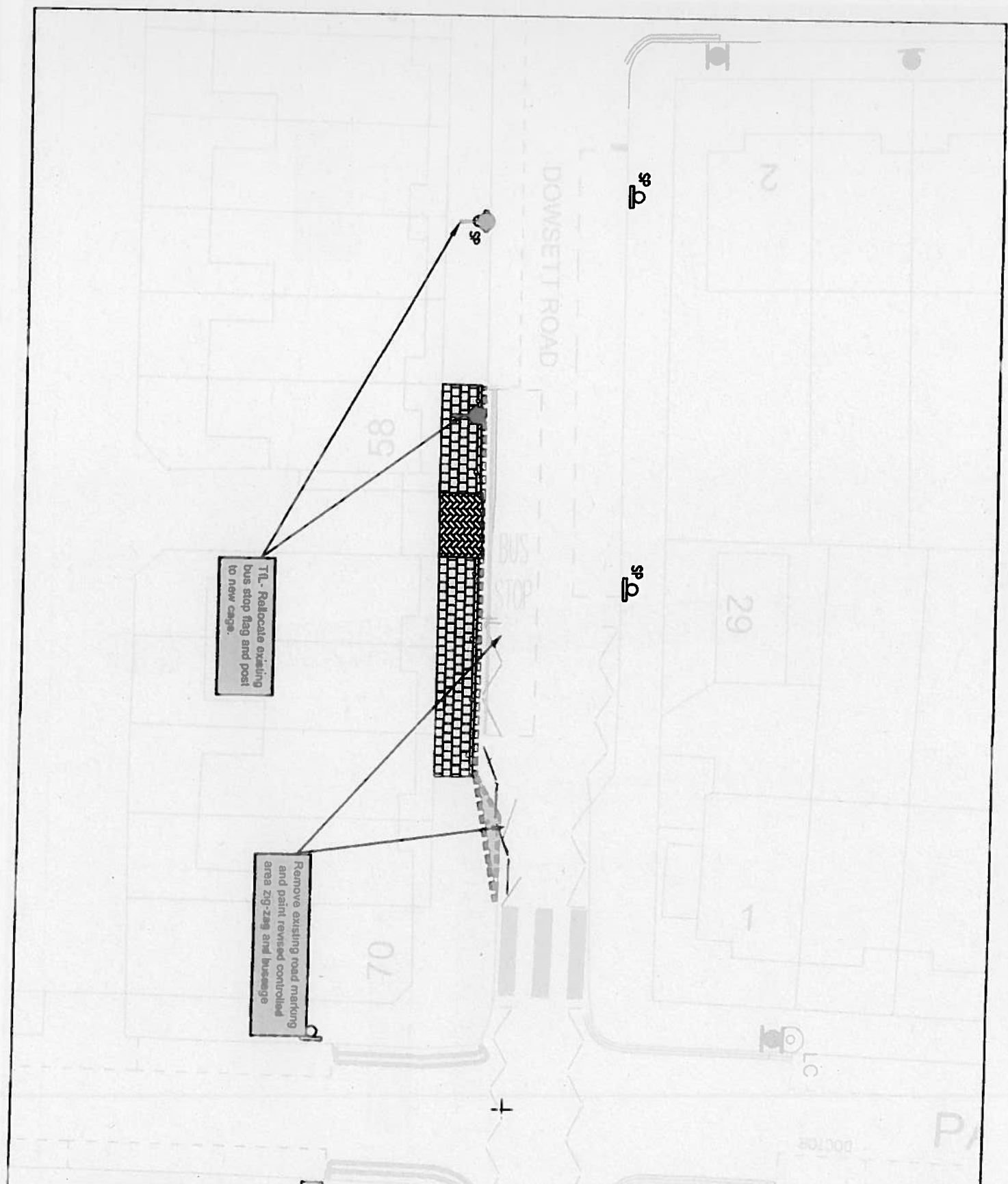
New zebra thermoplastic road marking

ROUTE 318  
PERMANENT BUS STOPS

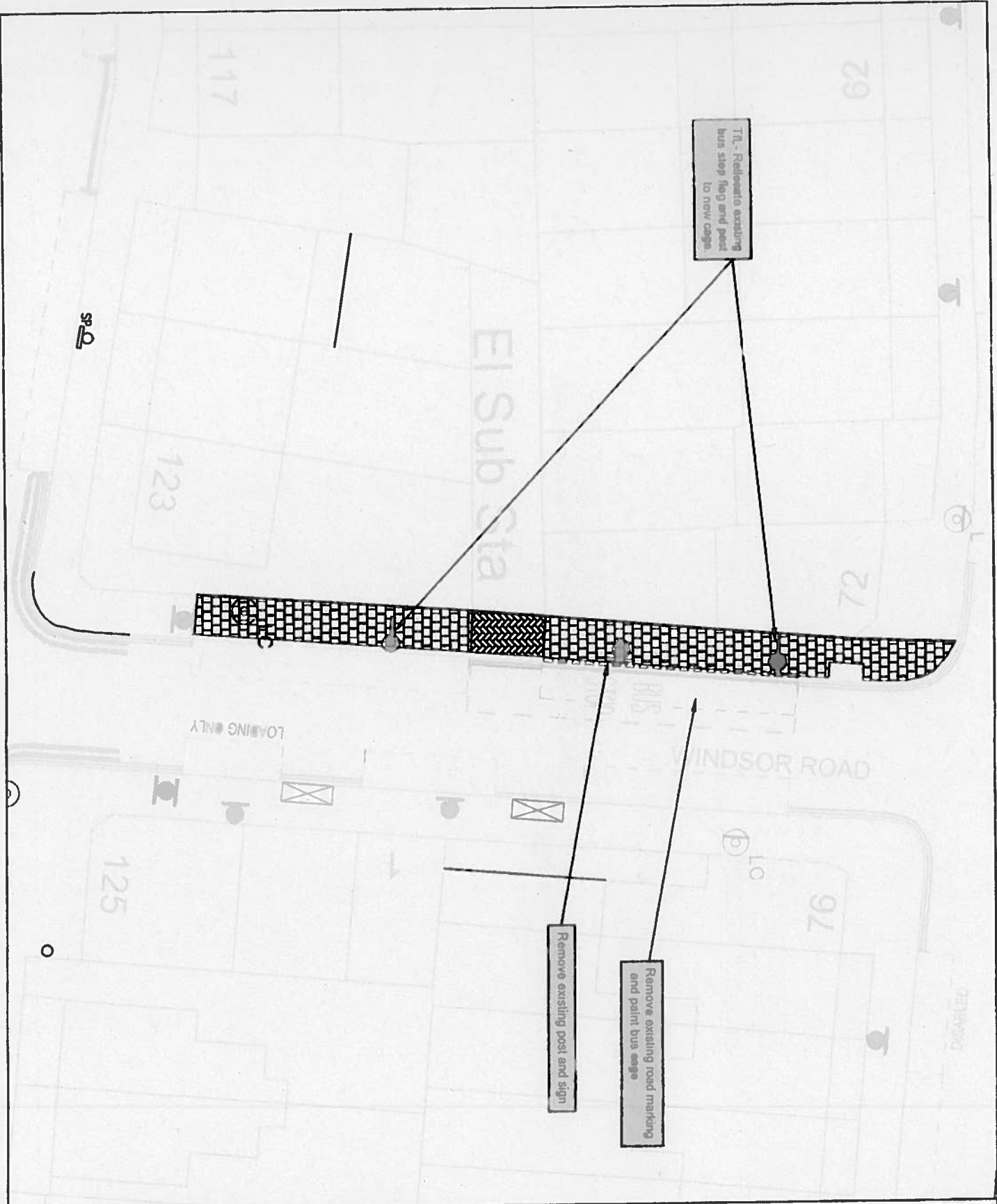
LOCATION A  
DOWSETT ROAD  
STOP BP4345

|           |    |         |
|-----------|----|---------|
| GS        | CS | ##      |
| 1:200 @A3 |    | 05/2017 |

R4HW-135-LOCATION A  
PLACE & SUSTAINABILITY  
SINGLE FRONTLINE









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**NOTES.**

1. Layout to be confirmed and set out with LBN engineer

 Remove existing parking edging and lay heavy duty (2000) precast paving stones of new factory laid 30mm thick trap road bed


 Concrete to 110mm. Lay grey coloured ligature (100x200x50) blocks on 30mm sharp sand bed


 Heavy casting kerb with 150mm options

 Lay 150 grade kerbs in dropped curbing.

 Remove and lay existing kerbs.

 Pave contingency to a depth of 40mm. Heavy duty class 1/2S 10 fish surface course

 Bus stop flag pole for option under separate works order from TL.

 New Bus Cape kerbing  
 Road markings to be removed  
 Kerb with thermoplastic road marking

| Ref | Description | Quantity | Units |
|-----|-------------|----------|-------|
|     |             |          |       |
|     |             |          |       |
|     |             |          |       |

**ROUTE 318**  
**PERMANENT BUS STOPS**

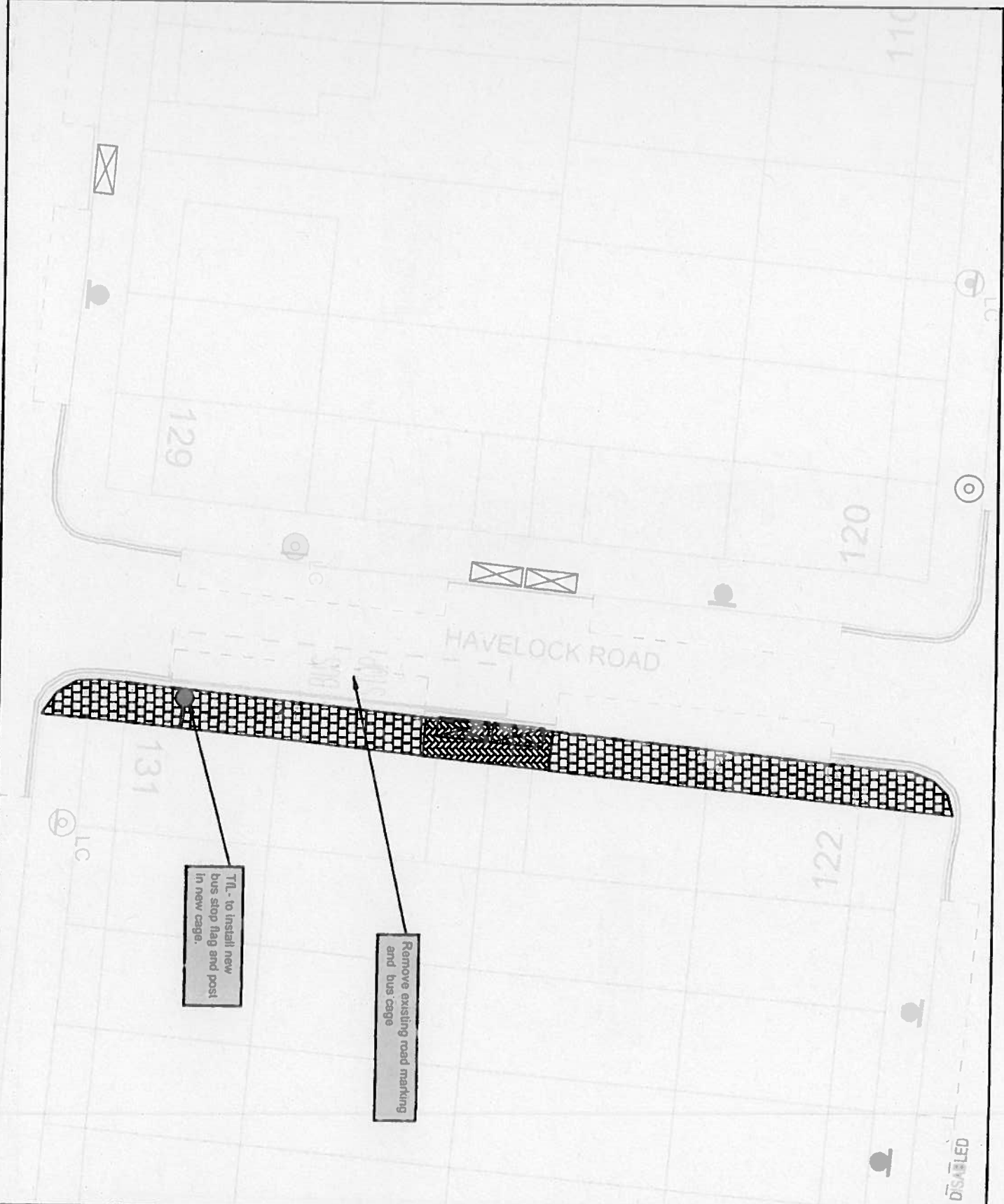
**LOCATION B**  
**WINDSOR ROAD**  
**STOP B-143/7**

| GS        | GS      | # |
|-----------|---------|---|
| 1/200 @A3 | 05/2017 |   |

PLMWP-1135-LOCATION B  
**PLACE & SUSTAINABILITY**  
**SINGLE FRONTLINE**







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**NOTES:**

1. Layout to be confirmed and set out with LBN engineer

Remove existing parking area and lay down parking area and lay down 150mm deep road bed

Excavate to 110mm, lay grey concrete to 100mm depth on 30mm deep sand bed

Apply existing base with 150mm spread

Lay 150 granite kerbs in dropped kerb

Remove and lay existing kerbs

Place kerbs to a depth of 40mm, lay 40mm thick 150S 19 thin surface course

Bus stop flag pole for center with supports under kerb from T.L.

See Bus Stop Marking

Road markings to be removed later when through-the-road kerbing

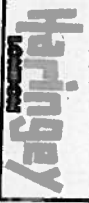
| Contractor | Checked | Date |
|------------|---------|------|
|            |         |      |
|            |         |      |
|            |         |      |

**ROUTE 318**  
**PERMANENT BUS STOPS**  
**LOCATION: C**  
**HAVELOCK ROAD**  
**NEW S OP**

| GS        | GS      | ## |
|-----------|---------|----|
| 1,200 @A3 | 05/2017 |    |

RJHWP-1135-LOCATION C

**PLACE & SUSTAINABILITY**  
**SINGLE PROPROFILE**



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**NOTES:**

1. Layout to be confirmed and set out with LEM engineer

Remove existing parking area and lay 100mm concrete paving stones of new boundary and lay 100mm concrete kerb and bed

Excavate to 110mm. Lay grey coloured lighter 100/100/100 blocks on 50mm sharp sand bed

Apply existing kerb with 120mm gradient

Lay 150 granite kerbs in stepped formation

Remove and lay existing kerbs.

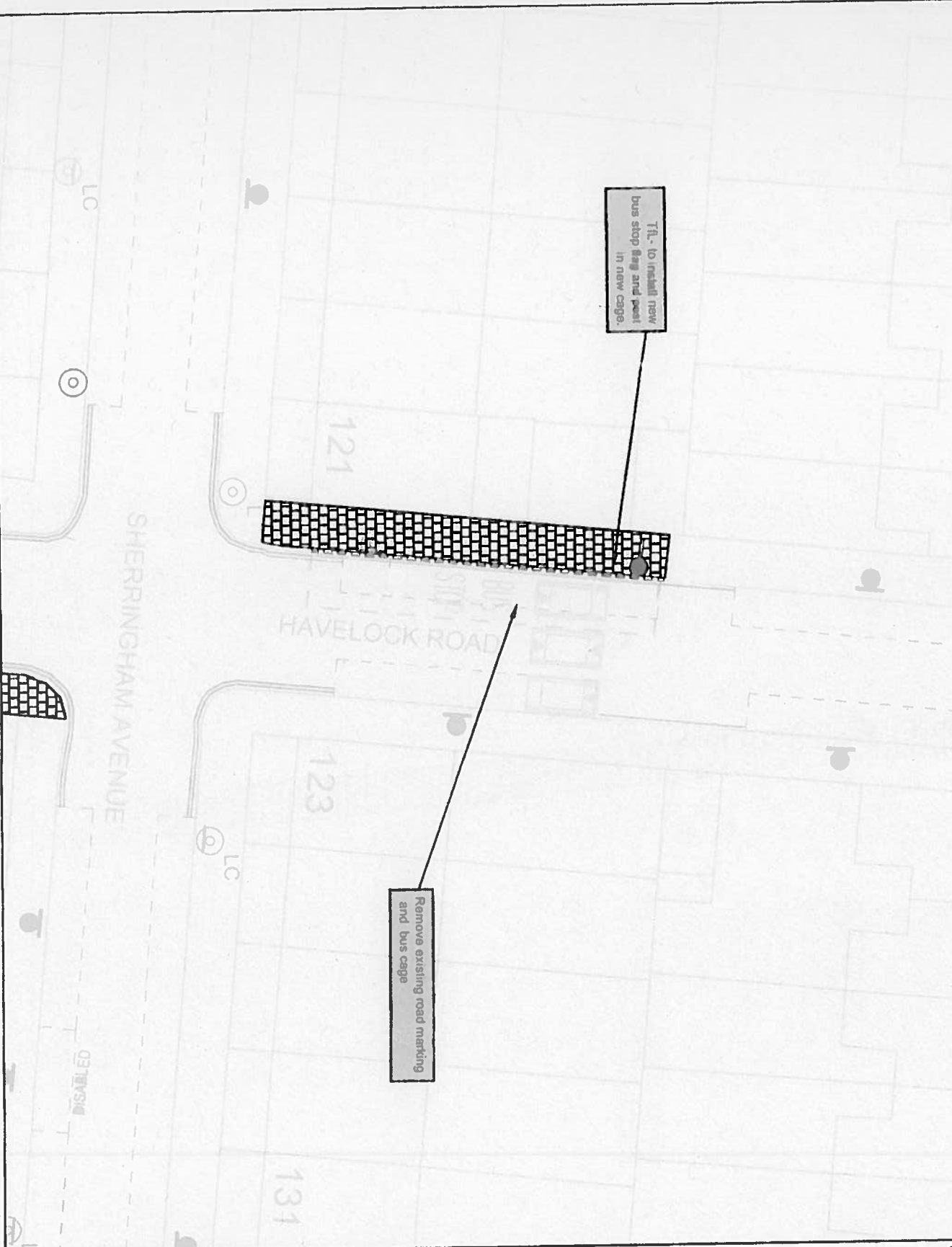
Form contingency to a depth of 40mm. Apply 40mm thick 15/25 100mm surface course

Bus stop flag pole for option under separate works order from TL

New Bus Stop Marking

Road markings to be removed

New white thermoplastic road marking



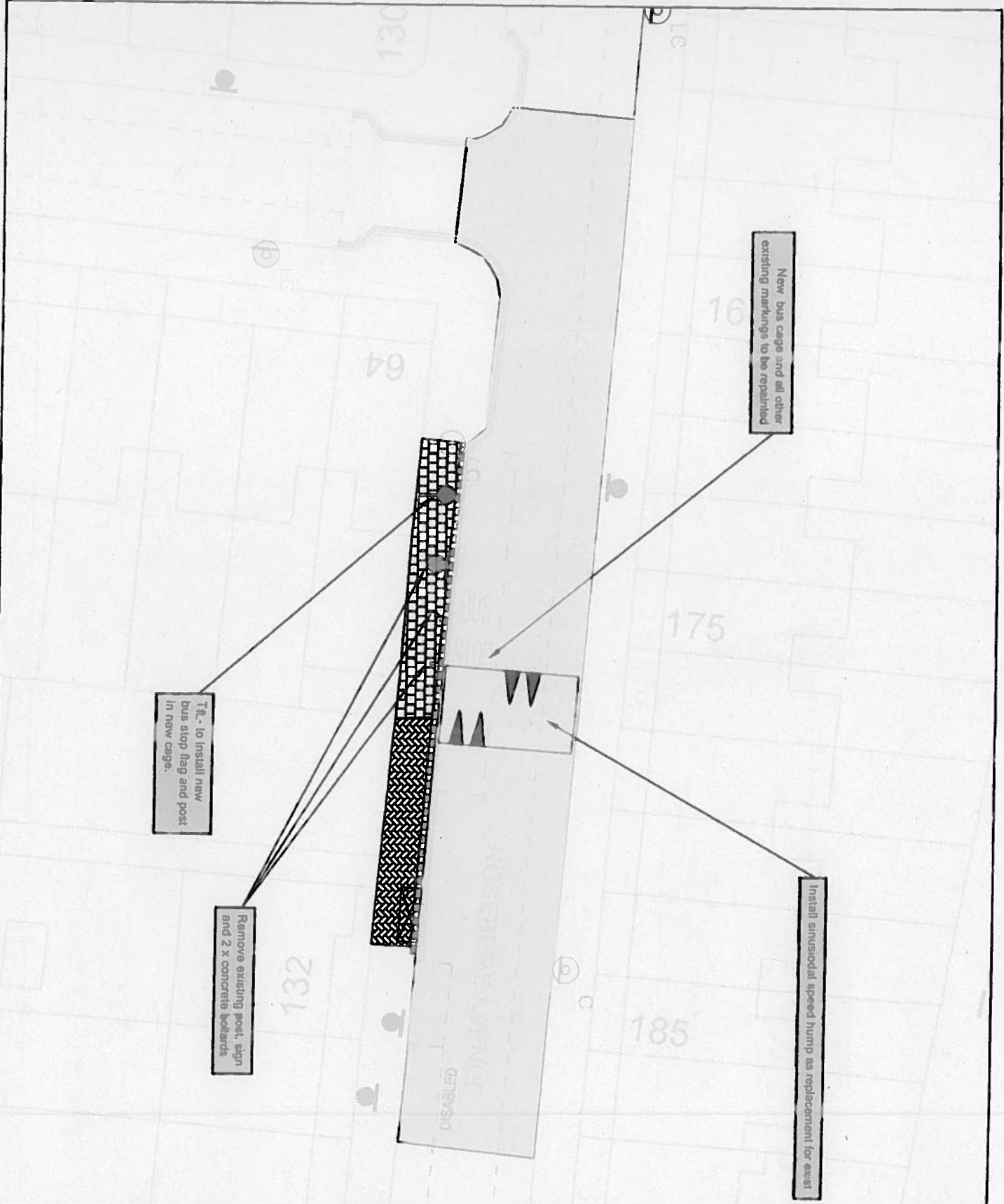
| Location   | Description         | Contract | Date |
|------------|---------------------|----------|------|
| ROUTE 318  | PERMANENT BUS STOPS |          |      |
| LOCATION D | HAVELOCK ROAD       |          |      |
|            | NEW STOP            |          |      |

| GS        | GS | ##      |
|-----------|----|---------|
| 1 200 @A3 |    | 05/2017 |

RJHWP-11354-LOCATION C

**PLACE & SUSTAINABILITY**  
SINGLE FRONTLINE





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**NOTES:**

1. Layout to be confirmed and set out with LBN

Remove existing post, sign and 2 x concrete bollards present at bus stop. New cage to be installed in new cage.

Replace to 150mm. Lay grey concrete under 150mm hump as shown on plan and bed.

Lay 150 granitic kerbs to depth as shown.

Remove and tip existing kerbs.

Place kerbs to a depth of 150mm. Lay 150mm concrete under 150mm kerbs as shown on plan.

Lay 150 granitic kerbs to depth as shown.

Existing kerbs to be removed.

New Bus Stop Marking  
 Road markings to be removed  
 New curb throughout road

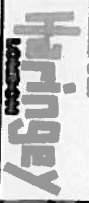
| NO | DESCRIPTION | QUANTITY | DATE |
|----|-------------|----------|------|
|    |             |          |      |
|    |             |          |      |
|    |             |          |      |

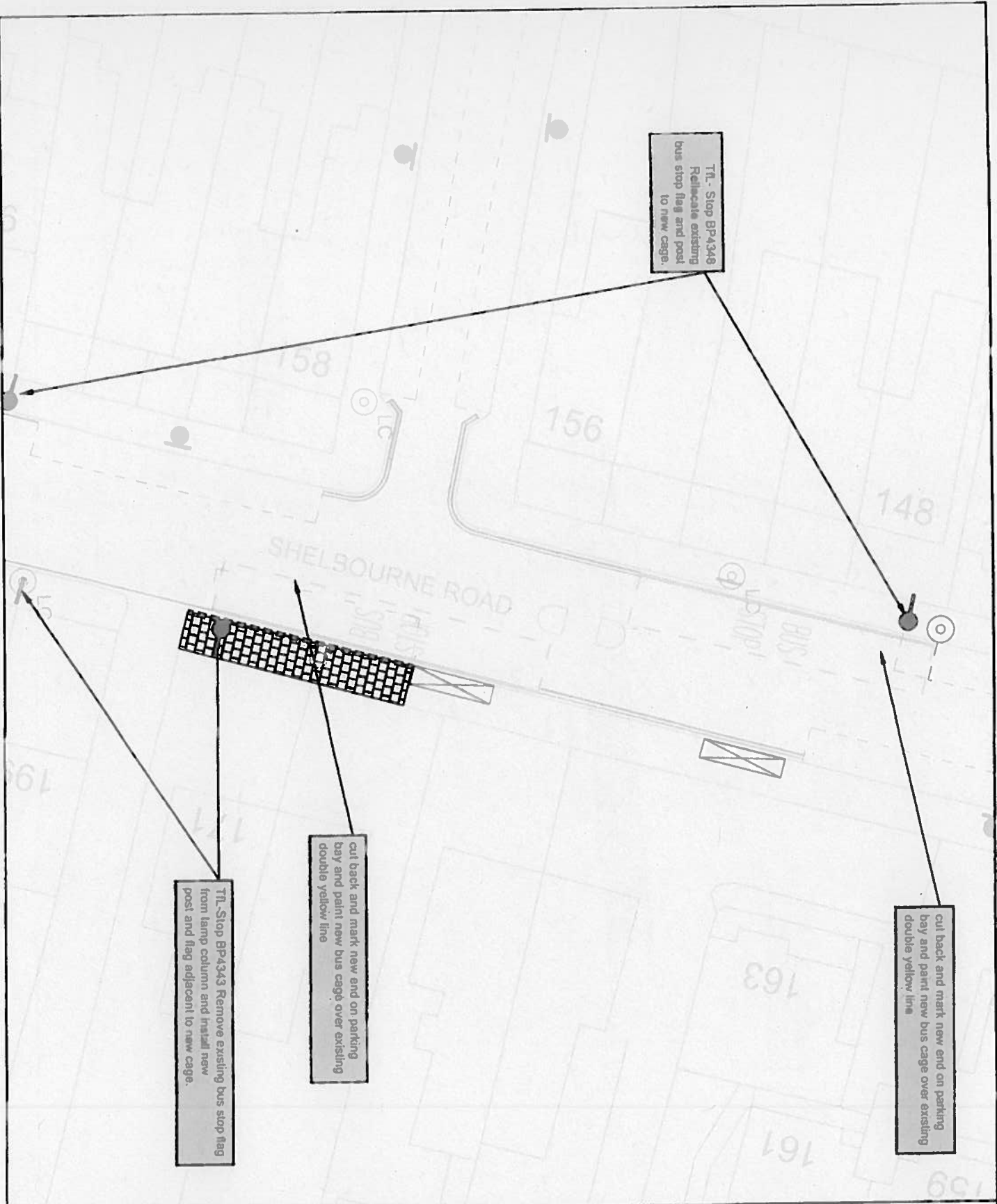
ROUTE 318  
 PERMANENT BUS STOPS

LOCATION: E  
 ROSEBERRY AVENUE  
 NEW STOP

| GS    | GS      | ## |
|-------|---------|----|
| 1,200 | 05/2017 |    |

RJHWP-1135-LOCATION C  
 PLACE & SUSTAINABILITY  
 SINGLE FRONTLINE





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**NOTES:**

1. Layout to be confirmed and set out with LHM engineer

Remove existing parking signs and the Bay's external painted parking signs at new bus bay level on 20mm thick deep sand bed

Extend to 100mm. Lay grey coloured regular 100x200mm blocks on 20mm deep sand bed

Bay's existing kerb with 150mm upgrade

Lay 150 granite kerbs to dropped curbside

Remove end of existing kerbs

Place kerbs to a depth of 100mm. Lay down kerbs TCS 10 to surface course

Bus stop flag pole for section from bus stop to other than TL

New Bus Cops Marking

Road markings to be removed

New white demarcation road marking

| Description                                    | Quantity | Date     |
|--|----------|----------|
| ROUTE 318 PERMANENT BUS STOP                   |          |          |
| LOCATION E SHELBORNE ROAD STOP BP4348 & BP4343 |          |          |
| GS   | GS       | AM       |
| 1:200 @A3                                      |          | 05/20/17 |
| R.J.H.W.P.-1136-LOCATION C                     |          |          |
| <b>PLACE &amp; SUSTAINABILITY</b>              |          |          |
| SINGLE FRONTLINE                               |          |          |
|  |          |          |