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QLD
PO Box 1280
Spring Hill, QLD 4004
T: (07) 3839 3011
admin.qld@strata.community

ACCC Northern Australia Insurance Inquiry
GPO Box 520
Melbourne VIC 3001
TO: insurance@accc.gov.au

September 6, 2019

Dear Sir/Madam

Thank you to ACCC for inviting submissions to the *Northern Australia Insurance Inquiry – Second Update Report*. SCA (Qld) has previously submitted their response to the ACCC *Northern Australia Insurance Inquiry* and the *First Update report*. SCA (Qld) has expressed its concerns in relation to insurance in North Queensland, with a focus on affordability (January 2018). However, since the initial Issues Paper in October 2017, our members have experienced a worrying trend of insurance providers leaving the North Queensland market.

About SCA (Qld)

SCA (Qld) is a non-profit, professional organisation for bodies corporate, body corporate managers and suppliers of services to the body corporate industry in Queensland. SCA (Qld), through its predecessor CTIQ, was established in 1984 and currently has nearly 800 individual and over 200 corporate members. SCA (Qld) members administer more than 65% (300,000) of all strata titled properties in Queensland and an estimated 90% of all managed properties. The strata sector comprises of 487,138 lots in 49,085 strata community schemes.

SCA (Qld), as the peak body for the strata industry, is in a unique position to understand the sector from a variety of viewpoints. Our membership represents not only strata managers but also service providers, allowing us to take into consideration a diverse range of factors affecting strata communities.

1. Focus Area 1

SCA (Qld) provided a submission in January 2018 following a survey of our membership. This submission reflected the affordability and availability issues North Queensland strata communities experience. In that submission we stated that 87% of our strata management company members said they had experienced an inability to obtain adequate insurance for at least one of their clients. 18 months on, the situation has significantly worsened due to less insurers operating in the North Queensland market, and there are now many cases where the combination of an exorbitant premium and a high excess have put consumers under enormous pressure. We flagged with the ACCC that some strata communities depend on insurance premium funding through financial institutions, an arrangement that is unsustainable in a market that is deteriorating.

With limited options, most consumers choose insurance based on the fee quoted, rather than suitability, even if this means underinsurance or a high excess. This is far from ideal, as once damage is incurred, they are faced with a large out of pocket contribution.

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1.1 Availability

In Queensland, a strata community must insure its common property, body corporate assets and any multi-unit building for full replacement value.[1]

If a strata community can not comply with this requirement, then it must seek the authorisation of the Commissioner for Body Corporate and Community Management for alternative insurance in a form that provides cover as close as possible to full replacement value.

The reality is that market conditions have deteriorated such that it has now reached the point that some strata communities can not obtain any insurance, and what is being offered by the few insurers who remain in the northern market is quickly becoming unsustainable.

Since the SCA (Qld) submission to the initial Issues Report, and particularly in the last month, members have reported the following insurance provider limitations affecting the availability of insurance in North Queensland.

Insurer/Broker	Limitations – refuse to insure
Longitude	Dropped out of 80% of the market in Townsville and Cairns, with strict requirements as to what they'll insure. Fully withdrawn from Mackay region.
SUU	Pre 1995
Brooklyn	Pre 1995 and within 200m of coastline
SCI	Pre 1985. No buildings with metal roofs.
Suncorp	Limited to less than $5 million total sum insured.
Resilium	Restrictions on schemes offering holiday letting.
CHU	Will only quote buildings managed by specific body corporate management firm (PICA), due to commercial agreement.
QUS	Will not quote in North Queensland

1.2 Availability impacting affordability

The SCA (Qld) submission to the Issues Report (January 2018) focused on the affordability of insurance in North Queensland, specifically noting that premiums had increased at a significantly higher rate than those in the rest of the state. The result of this compounding is that premiums in North Queensland were 2.6 times the average for the rest of Australia per $1000 insured in the latter stages of 2018.[2] Unfortunately, this trend combined with the disappearance of more providers from the market, has made North Queensland premiums even more disproportionate to the rest of the country.

Members have provided the following information as a snapshot of the difficulties faced by their clients.

Note: For privacy reasons SCA (Qld) has limited the details of all buildings listed in the above table, so they are not identifiable. These schemes remain confidential for consumer protection reasons, such as the devaluation of the property if these details are available publicly.

[1] For example, see sections 178 and 179 of the *Body Corporate and Community Management (Standard Module) Regulation 2008* (Qld)

[2] Australian Competition and Consumer Commission, (2018). *North Australia Insurance Inquiry: First Interim Report, p.38.* Retrieved from https://www.accc.gov.au/focus-areas/inquiries/northern-australia-insurance-inquiry/first-interim-report

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	Building 1	Building 2	Building 3	Building 4	Building 5
LOCATION/SUBURB	North Ward	North Ward	North Ward	North Ward	North Ward
# OF LOTS	93	18	12	42	6
CHARACTERISTICS OF THE BUILDING	5 Blocks 3 Stories	1 building 3 stories	3 stories	4 buildings, 4 stories	2 levels
YEAR BUILT	2008	1978	1998	2008	1980
BUILDING SUM INSURED 2017	$37,700,000	$5,667,953	$5,067,752	$20,175,409	$1,406,003
BUILDING SUM INSURED 2018	$37,700,000	$5,951,351	$5,321,140	$20,175,409	$1,834,875
BUILDING SUM INSURED 2019	$37,700,000	All Insurers Declined	$5,587,197	$21,385,934	$1,926,619
PREMIUM IN 2017	$89,719.19	$31,359.10	$26,685.81	$55,600.00	$9,513.84
PREMIUM IN 2018	$97,938.70	$34,323.54	$33,482.45	$57,580.00	$12,648.47
PREMIUM IN 2019	$152,572.82	All Insurers Declined	$96,317.66	$81,240.00	$22,856.51
BUILDING VALUATION DATE AND SUM	April 2019 $38,170,000	November 2018 $9,175,000	April 2015 $4,596,600.00	May 2015 $20,286,000	September 2014 $1,747,500.00
PREMIUM PER $1000 INSURED	$4.04	$5.77 (2018 figure)	$17.02	$3.79	$11.86
EXCESS	$5,000	$500	$1000	$1000	$1000
REASON BEING DECLINED	Location, claims history, Building materials	Location, Age, Building Materials	Location & Claims History	Location & Claims History	
STAMP DUTY (9% OF BASE PREMIUM)	$12,597.76	$2,834.05 (2018 figure)	$7,952.83	$6,707.89	$1,887.23

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	Building 6	Building 7	Building 8	Building 9	Building 10
LOCATION/SUBURB	CAIRNS	TRINITY BEACH	PORT DOUGLAS	CAIRNS	Magnetic Island
# OF LOTS	63	96	8	31	124
CHARACTERISTICS OF THE BUILDING	Seven-storey strata title building	Three-storey strata title building	Two-storey residential unit complex	Three-storey residential building	5 Buildings, Multi-Levels, Lift & Pools
YEAR BUILT	1995	2008	1994	1970s	2006
BUILDING SUM INSURED 2017	$15,300,000	$28,246,050	$3,804,799	$4,550,000	$50,083,147
BUILDING SUM INSURED 2018	$15,300,000	$28,246,050	$3,880,895	$4,687,000	$55,091.461
BUILDING SUM INSURED 2019	$15,453,000	$29,658,352	$3,958,513	$4,832,000	$56,000,000
PREMIUM IN 2017	$88,927.66	$78,432.54	$19,547.03	$30,231.94	$213,980
PREMIUM IN 2018	$92,446.77	$83,186.08	$25,678.68	$37,035.92	$697,991
PREMIUM IN 2019	$134,221.85	$167,702.79	$26,171.46	TBA – Renewal due 31/8/19 -Unable to procure cover, still trying however the one insurer out of approx. 17 likely to quote between $100,000 – $250,000. Possibly a 400% + increase	$851,126 (Saved $66,000 as policy does not include temp accommodation or loss of rent)
BUILDING VALUATION DATE AND SUM	November 2018 $15,534,000	September 2018 $31,107,526.45	March 2016 $3,452,490.75	December 2018 $4,687,000	October 2018 $68,302,400
PREMIUM PER $1000 INSURED	$8.69	$5.65	$6.61	$20.69 - $51.73	$15.20

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EXCESS	$64,000 all named cyclone claims $50,000 all storm and tempest claims $50,000 bursting, leaking, discharging or overflowing of pipes $50,000 water damage claims $1,000 all claims	$96,000 all named cyclones $7,500 Bursting, leaking, discharging or overflowing of pipes $7,500 Water Damage Claims $7,500 Storm & Tempest Claims $1,000 All Claims	$1,500 all bursting, leaking, discharging or overflowing of pipes $10,000 all named cyclone claims $500 all other claims wording $500 Earthquake	$10,000 water damage excess $2500 other claims	Basic $25,000 Cyclone Excess $1.25 Million
REASON BEING DECLINED	Lion – capacity is an issue Epsilon – capacity is an issue Pen, Vero, JUA, QBE, CGU, AXIS, SUU, QUS, Brooklyn, SCI, CHU, Longitude, Miramar, Zurich – no reason given	CHU - Declined to renew as falls outside guidelines QUS - Unable to quote due to location Brooklyn Underwriting - Unable to quote as exceeds capacity Longitude - Declined to quote as risk falls outside appetite SCI - Unable to quote due to location and construction	Longitude - Declined due to location & claims history Brooklyn - Declined due to location SCI (Allianz) - Declined due to age & location Resilium – Declined due to claims history	Age of building and claims history (mostly water leaks). Building has just installed a brand-new roof.	
STAMP DUTY (9% OF BASE PREMIUM)	$11,082.54	$13,847.02	$2,160.95	$3,058.01 (2018 figure)	

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	Building 11	Building 12	Building 13
LOCATION/SUBURB	Redlynch	Cairns	Cairns
# OF LOTS	98	30	8
CHARACTERISTICS OF THE BUILDING	BFP, 2-storey, 2 x pool	BFP, 3-storey, pool	BFP, two-storey, pool
YEAR BUILT	2007	1975	1980
BUILDING SUM INSURED 2017	$33,693,857.00	$5,402,250.00	$2,115,655.00
BUILDING SUM INSURED 2018	$25,100,000.00	From 30/09/18 - $5,490,000.00 From 16/10/18 - $6,181,344.58	$2,115,655.00
BUILDING SUM INSURED 2019	$25,100,000.00	$6,181,344.58	$2,242,594.00
PREMIUM IN 2017	$99,646.44	$32,010.24	$10,321.33
PREMIUM IN 2018	$160,632.20	$93,182.61	$12,184.96
PREMIUM IN 2019	$139,137.00	Policy expiration in October BC concerned that they will be unable to obtain renewal terms.	$19,621.50
BUILDING VALUATION DATE AND SUM	Scheme obtained two comparative BRE reports to negotiate lowest BSI with insurer: June 2018 $55,314,000.00 via Solutions IE	October 2018 $6,181,344.58	September 2017 $2,241,539.11

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	September 2018 $25,100,000.00 via ACVAL BC committee adopted the report from ACVAL and issued copy of historical reports completed by QBM in 2007 and 2012 along with evidence of weighted indexation to insurer to substantiate ACVAL BRE which the insurer and broker accepted.		
PREMIUM PER $1000 INSURED	$5.54	$15.07 (2018 premium figure)	$8.75
EXCESS	$98,000.00 cyclone excess with Contingency Buydown Policy this is reduced to $20,000.00 Basic Excess - $500.00	$50,000.00 all water damage and blocked drain claims $50,000.00 cyclone excess	Basic $1,000.00 per claim $10,000 cyclone excess $10,000 bursting, leaking, discharging or overflowing of pipes and/or apparatus and any resultant damage $10,000 water damage claims
REASON BEING DECLINED	JLT ISR Programme offered via various insurers, premium increased to $197,079.00 with cyclone excess of $150,000.00 and a sub-limit of cover in the event of cyclone to $10,000,000 only. Brooklyn – Declined as exceeds $25 million SI capacity Longitude – Declined due to location of risk and outside underwriting criteria AIG – Withdrawn from FNQ market Policy implemented via SUU.	Longitude – Declined to renew due to claims history SCI – Declined due to age and location Brooklyn – Declined due to age and location Resilium – Unable to quote due to value capacity limit ISR policy implemented via Panel of Insurers with lead being SWISS RE	Longitude - Longitude have change their underwriting guidelines, and unfortunately cannot continue offering cover. SCI – Declined due to age and location Brooklyn – Declined due to location Policy implemented via SUU.
STAMP DUTY (9% OF BASE PREMIUM)	$11,488.38	$7,693.98 (2018 figure)	$1,620.12

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The list of buildings has been supplied by SCA (Qld) members from varied locations across North Queensland and demonstrates that the affordability issues are widespread. More insurance providers are leaving the market and the risk appetite of remaining insurers is also decreasing, thereby contributing to the steep rise in North Queensland insurance premiums. Given that strata buildings are required by law to be insured for full replacement value, bodies corporate have little power to push for lower rates. In 12 of the 14 building examples provided by members, the 2019 premium is higher than the 2018 premium, with the range from a reasonable 0.02% in the case of Building 8 (although it is important to note that the 2019 premium is 34% higher than the 2017 premium) to an astronomical 287% higher in the case of Building 3.

Premiums are even more unaffordable if you consider that not only have they increased dramatically, but the base cost was already higher than the rest of the country. This has resulted in a building sum per $1000 insured that is drastically higher than stated in the First Interim Report only nine months ago. According to the First Interim Report, the nation-wide average is $0.91 per $1000 insured, but of the 14 building examples provided by SCA (Qld) members, the lowest premium is Building 4 with $3.74 per $1000 insured.[3] This is already over four times higher than the national average, but is still significantly lower than Building 3, whose premium equates to nearly 19 times ($17.02) higher than the Australian average.

It is important to note that not all the premium paid by a strata community goes to the insurer. Stamp duty is based on the initial insurance policy fee. If this fee is raised to 19 times the country average, then the stamp duty will also be 19 times the national average. Currently set at 9%, stamp duty equates to nearly $14,000 in the case of Building 7 and $70,276 for Building 10.

Compounding the issue of higher premiums is that the terms of the policy, specifically the excess, are also often unfavourable. In many cases, the excess reaches five figures for any damage caused by a named cyclone, with the excess standing at $98,000 in the case of Building 7, and for Building 10 an excess of $1.25 million.

2. Proposed solutions to increase availability

Two years ago, the real concern was the escalating premiums. It is now that insurance simply is not available to some strata communities. The situation is worsening with each month that passes as more insurers are withdrawing from the northern market or limiting their offering in a substantial way. This is now becoming a crisis.

The availability is entirely dependent on insurers offering cover for North Queensland schemes. While this is a commercial decision for each company, we believe there are some measures that could motivate insurers to re-enter the market.

[3] Australian Competition and Consumer Commission, (2018). *North Australia Insurance Inquiry: First Interim Report, p.38.* Retrieved from https://www.accc.gov.au/focus-areas/inquiries/northern-australia-insurance-inquiry/first-interim-report

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2.1 Legislative amendment for "tempest" to be removed so that more providers can enter the market and a minimum level of insurance is maintained at a reasonable premium

Currently, the *Body Corporate and Community Management (Standard Module) Regulation 2008* mandates strata communities have coverage for tempest.

SCA (Qld) has been advised by insurance providers that wind and cyclone cover is the main barrier to entry in the North Queensland market, and if it were to be removed as a legislative requirement, they would be able to offer quotes to more buildings and provide a second option without cyclone cover to their current clients with a drastically reduced premium. A north Queensland policy without cyclone coverage should be very similar to those available in south-east Queensland.

However, as this option would leave strata owners without protection from cyclonic events or wind events, we recommend this be used as a temporary measure or in conjunction with the reinsurance pool.

2.2 Introduce a cyclone levy similar to the Earthquake levy in NZ

Under the New Zealand system, the levy is paid by all holders of house and/or contents fire insurance policies and contributes to the centralised pool, which covers the first $100,000 (plus GST) of house damage, the first $20,000 (plus GST) of contents damage and damage to associated residential land, which is not covered by private insurers. The levy is paid at the time that private insurance is paid (currently $0.20 for every $100 of insurance cover to a maximum of $276). This system could be adapted to the Australian market and used to fund property repairs in the event of cyclone damage.

SCA (Qld) supports the ACCC measure for a reinsurance pool and suggests this should be funded by raising a levy on the country's insurance, which would only be used in the event of a named cyclone event. Insurers have indicated to SCA (Qld) that if cyclone was excluded from North Queensland insurance cover providers would be able to re-enter the market and North Queensland would be treated similarly to South-East Queensland once more.

3. Proposed solutions to increase affordability

SCA (Qld) acknowledges the ACCC's concerns in respect to the insurance in North Queensland. We believe that there are measures that could ease the pressure.

3.1 Removal or reduction of stamp duty

SCA (Qld) agrees with Recommendation 1 in the Second Update Report.[4]

Despite the awareness around the North Queensland insurance affordability issue tightening around 2011, the Queensland Government raised the stamp duty for Class 1 General

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[4] Australian Competition and Consumer Commission, (2018). *North Australia Insurance Inquiry: Second Update Report, p.38.* Retrieved from https://www.accc.gov.au/system/files/Northern%20Australia%20Insurance%20Inquiry%20Second%20Update%20Report.pdf

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insurance from 7.5% to 9% in July 2013. SCA (Qld) proposes to reduce or remove the stamp duty, thereby easing the pressure by 9% for all schemes, making a significant difference in a market that has become much worse in the past six years since the duty was raised. This measure could be temporary until the market is back to comparable conditions to South-East Queensland.

The stamp duty from the last six years could even be used as the initial funds in the cyclone reinsurance pool. Even the most conservative estimates would have this figure in the tens of millions of dollars, so it would provide a significant safety net while the pool collects the first levies.

4. General Comments on Final Recommendation: Strata managers to be remunerated by body corporate only

We understand that the Second Update Report had a specific Focus area and that no further comments were requested on Draft Recommendation 9 in the First Update Report. However, we believe that the ACCC has based its views on some common misconceptions about the strata industry, specifically the relationship between commissions and the strata manager and for what the commission is received. Strata managers are highly-skilled, trained professionals in a sector that does not require licensing or registration. The skill set of a competent strata manager is comparable to any tertiary-trained professional and requires approximately 2 years of on the job training and ongoing professional education to continue to understand the legislative compliance requirements that apply to strata communities.

The submission provided in April 2019 supported our National body's submission and we would like to submit further comments. Many strata management companies are structured in a way that the service fee per lot is under cost as the companies depend on insurance commissions that they receive from the insurer, not the body corporate. This structure ensures that consumers are less impacted by the strata manager administrative costs. It is not the strata manager's influence making insurance premiums in North Queensland higher and hence increasing the commission accordingly.

The Inquiry Report states that there is a financial interest to the strata manager which causes a conflict. A solution to fix that perception that a higher premium is more desired by the body corporate manager, the ACCC could consider in its recommendation to mandate a fixed fee capped at a maximum per lot. Alternatively, the ACCC could consider the ability to tie any commissions to the building value instead of the premium.

However, SCA (QLD) submits that the proposed prohibition on Strata Managers receiving insurance commissions would not have a significant effect on the reduction of insurance premiums and would, in fact, result in an overall increase of costs to the consumer, being the Bodies Corporate (and ultimately the individual lot owners comprising each Body Corporate).

SCA (Qld) insists that all indicative modelling has shown that the ban on commissions would not alleviate the premiums paid. 50-60% are at an average of $800 commission paid per year. The value of the commissions currently being paid to Strata Managers will not simply be "saved" by the consumer. Instead, this amount will be absorbed by insurance brokers or by the insurers themselves to offset against their increased costs of providing insurance

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products and services to strata titled Bodies Corporate, due to the reduction of services offered by the Strata Manager (outlined below).

This will result in the Bodies Corporate paying similar prices for insurance to those currently paid and either:

- Paying more for the services offered by the Strata Manager on a fee for service basis; or
- Not having access to such services, where Strata Managers are unable or unwilling to provide such services.

Insurance premiums are priced by insurers based on a combination of building specific risk factors and financial /insurance market factors including natural peril risk, attritional claims, reinsurance costs, operational costs, and profit margin. Commissions currently paid to Strata Managers would fall into the "operational costs" category and it is the submission of SCA(QLD) the prohibition of commissions to Strata Managers will simply result in the increase in the insurer's operational costs, due to the loss of the benefit of the services offered by the Strata Manager. This will result in either a pressure for insurers to increase their premiums to cover the increased operational costs or a reduction in profit margin, forcing some insurers to refrain from providing insurance in the North QLD market and further reducing access to insurance for Bodies Corporate in this area.

Services offered by strata managers

The services currently offered by strata managers are done so within the ambit of a strata manager's authority as an Authorised Representative of one or more Australian Financial Services License holders. These services generally fall within the definition of "arranging" for a person to "deal" in a financial product under Section 766C of the Corporations Act (Cth) 2001.

Removing a strata manager's commissions would lead to uncertainty over their ability to act as authorised financial representatives, likely resulting in:

1. Strata managers becoming unable to provide those arranging or dealing services in relation to insurance as it would be a breach of the Corporations Act. This lack of an affordable, knowledgeable service provider will increase insurers costs and ultimate costs of policies, whilst reducing service levels for consumers; and/or

2. Strata managers being required to become AFSL holders themselves, which increases the strata managers' costs of compliance and makes their fee for service prohibitively expensive for strata schemes.

Strata managers play an important role for the consumer (Bodies Corporate) in relation to the financial product (Strata General Insurance Policy), the Bodies Corporate would likely have not obtained the insurance policy without the strata manager's involvement. The strata manager adds value for both of the parties to the transaction, by:

- arranging and updating property valuations for insurance purposes;
- facilitating the insurance decision-making process by holding meetings liaising with multiple lot owners and committee members to facilitate the transfer of information between the Bodies Corporate and the insurers;
- completing insurance applications on behalf of the Body Corporate and communicating their insurance requirements to insurers, underwriting agencies and insurance brokers;

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- seeking, collating and acting on Body Corporate instructions to make arrangements with respect to issuance, variation, renewal and cancellation of insurance policies;
- providing the Body Corporate with copies of insurance policy wordings and disclosure documentation;
- maintaining risk data and claims histories to negotiate best options;
- maintaining a schedule of business activities for commercial premises; and
- aggregating the customers for insurance products, making it easier for:
  - the insurers to identify and offer products to Bodies Corporate resulting in reduces sales and marketing costs for these products; and
  - The Bodies Corporate to obtain multiple insurance quotations and documentation in an efficient manner to enable them to make informed decisions on the selection of insurance products.

It is the submission of SCA(QLD) that the "Final Recommendation: Strata managers to be remunerated by body corporate only" would:

- Increase the operational costs to insurers in sales, marketing and claims processing, resulting in premiums remaining the same or increasing;
- Increase the costs to Bodies Corporate for the services offered by Strata Managers on a fee for service basis (with no saving on insurance premiums);
- Reduce the likelihood of Strata Managers providing some of the services currently offered, where Strata Managers would lose the protection of operating under the authority of being an Authorised Representative of an AFSL holder; and
- Reduce the commercial viability of insurers offering strata general insurance in the North QLD market, resulting in even further reduced access to insurance for the Bodies Corporate in this area.

Conclusion

Strata Community Association (Qld) proposes that further detailed considerations are made as to the proposed solutions. Affordability is a problem that is more real than ever but availability is of foremost concern when the market is at a critical juncture of unavailability.

For further questions, the SCA (Qld) Board of Directors is available to the ACCC. Please contact me on (07) 3839 3011, 0458 120 917 or via email: katrin.watson@strata.community.

Yours faithfully,

Katrin Watson

SCA (Qld) Executive Officer