



Alaska Longline

FISHERMEN'S ASSOCIATION

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September 21, 2011

Mr. Glenn Merrill
Asst Regional Administrator
Sustainable Fisheries Division
Alaska Region, NMFS
PO Box 21668
Juneau, AK 99802-1668

Re: Halibut Catch Sharing Plan (RIN: 0648-BA37)

Dear Mr. Merrill,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA) in support of immediate implementation of the Halibut Catch Sharing Plan (CSP) in Areas 2C and 3A.

ALFA's approximately 100 members are owner-operators and deckhands of community-based family fishing boats who depend on the halibut resource in Areas 2C and 3A. ALFA was established in 1978 and has consistently supported management policy that promotes sustainable fisheries and sustainable fishing communities. ALFA members have participated in the lengthy, and analytically thorough public process dedicated to developing the CSP and have reviewed the proposed rule to establish the CSP. ALFA's membership finds the CSP to be fair and equitable, designed to promote resource conservation, and essential to resolving the conflicts currently tearing apart Alaska's coastal communities.

History of the CSP

Development of the CSP was initiated by charter operators, who asked commercial fishermen to work with them to develop a management framework that achieved sector accountability while providing a mechanism for quota transfer between sectors. ALFA participated in these initial discussions and stood before the Council with a broad cross section of charter representatives to request Council support for the CSP. The charter industry later withdrew its support for the CSP allocation, but continued to demand a continuous season of historic length, stable management measures throughout the charter season and between years (to the maximum extent possible), and an opportunity for growth. Led by

the State of Alaska, the North Pacific Fishery Management Council (Council) worked hard to accommodate charter demands to an unprecedented level while still protecting those who have historic and cultural dependence on the halibut resource. The result is the CSP.

Fair and Equitable

Because the commercial industry is concerned by charter overfishing and weary of the allocation battles, tremendous compromises were made to accommodate charter interests. Under the CSP, the charter sector is still guaranteed a continuous season of historic length. Charter harvest is allowed to vary by 3.5% above and below the combined charter and commercial catch limit before bag limits are adjusted to provide additional stability and predictability to the charter industry. This 3.5% buffer equates to approximately 20% of the charter allocation—in other words, charter harvest can vary by up to 20% of the charter allocation before compensatory action is taken by managers. The charter allocation, which is based on historic harvest levels that include charter catch limit OVERAGES in Area 2C, provides the charter fleet a higher percentage of the halibut resource at low abundance levels, which shifts the burden of conservation onto the commercial sector. As discussed below, the charter industry would have been allocated more halibut under the CSP in both Area 2C and 3A over the past six years than it was under the GHL. Finally, the CSP also allows charter operators to acquire more halibut by leasing quota from the commercial sector, but the same option is not available to the commercial sector. In short, the CSP accommodates the charter industry to the maximum extent possible while still addressing the Council's problem statement to resolve resource and allocation issues plaguing the halibut fishery.

Conservation and Allocation

At its core, the CSP is a conservation plan that ensures charter removals are proportional to resource abundance and that charter overages are prevented. While the GHL responded ineffectively to charter overages (as evidenced by seven years of 2C charter overharvest), the CSP relies on pre-season forecast and management action to limit charter harvest to the target harvest range. Under the CSP, the annual combined catch limit and projected charter harvest trigger bag and size limits that are specified in the prescriptive CSP management matrix developed and approved by the Council. This system shortens the management timeframe and increases management predictability for the charter sector. To quote from the Council's 2008 motion: "It is not the Council's intent to revisit or readjust bag limits; such bag limit changes will be triggered by changes in combined charter and setline catch limits established annually by the IPHC." ALFA supports this approach as necessary to protect the halibut resource from charter overharvest, and agrees that: "annual implementation of the CSP...w [ill] be timely and responsive to changes in halibut abundance while providing the guided sport sector with advance notice of the effective guided sport fishery management measures." 76 Fed. Reg. 44182 (July 22, 2011).

Some charter advocates now claim the Council neither anticipated nor planned for the necessity of a one halibut daily limit in Area 3A. This claim is refuted by the Council record. The CSP management matrix developed by the Council addresses the full range of allocation scenarios and prescribes the bag

and size limits that will be implemented to constrain charter harvest under each scenario. This matrix was created and refined at the October 2008 Council meeting and was before the Council in writing when the Council took a final vote on the CSP. The matrix before the Council included both high and low abundance levels; in terms of harvest measures, it covered the range of bag limits from **one halibut** with a maximum size limit to two halibut of any size for **both Area 2C and 3A**. The Council reviewed the matrix and discussed aspects of the matrix at length. The Council was cognizant of the differences between Area 2C and 3A and adjusted the management tiers to account for those differences. To illustrate the detail of the discussion and the amount of information before the Council as the matrix was finalized, below are three out of many excerpts from the Council's deliberations. First from Council member Mr. Ed Dersham, expressing his concerns relative to 3A tiers and triggers; the second excerpt from Council member Mr. Bill Tweit in response to an amendment that set matrix triggers to liberalize charter bag limits; and the third from Council member Mr. Duncan Fields when he successfully amended the upper bound of tier 3 in Area 3A, which is the dividing line between a two halibut bag limit and a bag limit that places a maximum size limit on one of the fish, from 30 million pounds to 27 million pounds. Mr. Field's motion was a direct response to the concerns raised by Mr. Dersham and clearly reflect the attention paid to selecting management tiers and triggers appropriate for Area 3A.

"I find the substitute motion fundamentally different than the state motion. I think it has several flaws that show up in almost every section of the motion. I don't think, as written, the numbers used to determine the triggers can be considered fair and equitable. . . . I feel that, for example, in the 30 million pound threshold that causes 3A to go to a one fish over and one fish under 32 bag limit cannot meet a test of fair and equitable when you look at the history of the fishery and the fact that under - - if you had been under that regulation combined - - with the combined catch numbers from 1995 through 2006, 3A would have been a one fish over, one fish under bag limit. And I don't believe anybody has looked at those numbers as we went through the years and said that was the case. In other words, I think the outcome of this motion takes us to something that is worse than the status quo GHL management in that case." Mr. Ed Dersham, Transcript of Council proceedings (October 4, 2008), by Glacier Stenographic Services, Juneau, AK. p. 166.

"I support this motion. To me it does, as Duncan said, it provides the symmetry. It simply is a test, that if it turns out that the results of our management actions that are embedded in the catch-sharing plan – the catch sharing plan is a plan to share catch. It also has some prescriptive management actions. If the results of those management actions on the charter fleet turn out to depress the charter fleet catch a lot more than we're anticipating, in terms of allocation, the effect of Mr. Fields' amendment is great, you get to bounce up." Mr. Tweit, Transcript of Council proceedings (October 4, 2008), by Glacier Stenographic Services, Juneau, AK. p. 221.

"This is really a kind of a difficult line to draw. You look at the current charter fleet in 3A and it's growing comparatively slower than 2C. You look at their catch limits; it's been two fish for a long time. And then you hind-cast the boxes that we're putting in there now, and it's apparent that unless we move this line, they would have been at 1.5 fish for a number of prior seasons. In deciding where to

draw this line, I looked at two things. I looked at the changes in the ranges that we just voted on ... Also Mr. Chairman, if we look at the revised State graph, the last graph I believe that was passed out which showed both the impacts on the charter sector and the commercial sector, this is the small print graph that was a revised state graph, and you look at the column to the upper left, the historic CEYs in charter harvest and there's 13 years of information there. And about, I think six, fall on the one side of 27 and seven fall on the other. So the 27 million range is about mid-range of what has occurred in the last 13 years. And I felt like we shouldn't be restricting the 3A halibut charter fleet below the two fish for the mid-range of what's occurred over the last 13 years, the data we have. So that's how I came up with the 27 million. It's a little bit of balancing." Mr. Fields, Transcript of Council proceedings (October 4, 2008), by Glacier Stenographic Services, Juneau, AK, p. 249.

This motion and supporting rationale document that the Council carefully studied the management matrix, took into consideration historic harvest levels, and established tiers and allocations consistent with the data before them. The matrix specifies tiers and triggers for the one halibut daily limit in both Area 2C and 3A. The one halibut bag limit was already pending in Area 2C despite International Pacific Halibut Commission (IPHC) projections that indicated otherwise; the Council had every reason to be thorough in preparing for the possibility in Area 3A. As these two excerpts from a lengthy discussion document (the discussion of the matrix, triggers, and management measures continues for 350 pages in the transcript), the review was thorough, the discussion was robust and the CSP, with the management matrix clearly defined, was adopted on a 10-1 vote. While at the time neither managers nor fishermen expected halibut stocks to fall to the current low levels, the Council's matrix identified the potential and established a system to address that scenario **for both Areas 2C and 3A**. That system very clearly includes the one halibut limit.

The current low abundance levels are economically painful, but the Council was clear that under the CSP they intended Area 2C and Area 3A charter and commercial sectors to share equally in conservation and abundance. Under the GHL, the commercial fleet has borne the conservation burden at these low abundance levels—the 3A commercial catch limit has dropped 44% while the GHL has remained stable; the 2C commercial catch limit has dropped 76% while the GHL has dropped only 45%—and been exceeded every year by 52% on average. Subsistence and sport halibut fishermen have also suffered from charter harvest that is disproportionate relative to abundance. The status quo is unacceptable. It fails to protect the resource from overharvest and fails to meet the fair and equitable standard.

CSP vs. GHL Management

Some charter operators argue that they are worse off under the CSP than under the GHL. As the table below illustrates, if the CSP had been in place since 2004 instead of the GHL, the charter industry would have enjoyed a higher cumulative catch limit than they have under the GHL in both Area 2C and 3A.

TABLE 1
Area 2C Comparative Charter Allocations

Year	GHL ¹	CSP % Allocation	CSP ¹ Allocation
2004	1.432	15.1%	1.79
2005	1.432	15.1%	1.87
2006	1.432	15.1%	1.85
2007	1.432	15.1%	1.50
2008	0.931	15.1%	1.08
2009	0.788	15.1%	0.90
2010	0.788	15.1%	0.78
2011	<u>0.788</u>	17.3%	<u>0.54</u>
Total	9.023		10.31

TABLE 2
Area 3C Comparative Charter Allocations

Year	GHL ¹	CSP % Allocation	CSP ¹ Allocation
2004	3.650	14%	3.97
2005	3.650	14%	4.01
2006	3.650	14%	4.01
2007	3.650	14%	4.18
2008	3.650	14%	3.90
2009	3.650	14%	3.55
2010	3.650	14%	3.30
2011	<u>3.650</u>	14%	<u>2.52</u>
Total	29.20		29.92

¹ Weights in millions of pounds.

ALFA suggests this table be included in the Environmental Assessment/Regulatory Impact Review/Final Regulatory Flexibility Analysis for the Area 2C/3A Halibut Catch Sharing Plan (EA), along with the graph illustrating the table submitted by the Halibut Coalition and also attached to these comments.

The charter catch limit under the CSP is likely to be lower in 2012 than it would have been under the GHL, but only because the resource has declined over the past five years and the charter catch limit has not been reduced proportionately. As stated above, resource abundance has decreased by 58% in Area 2C over the past six years and the commercial catch limit has been reduced by 76% to protect stocks. Over the same time period, the Area 2C GHL has been reduced by 45%, and the charter industry has overfished its allocation every year by 54% on average. In Area 3A the commercial catch limit has been reduced 44% since 2005, survey catch rates are at historic low levels, and the charter GHL has not been reduced at all, hence commercial fishermen has been forced to bear the burden of conservation. The reductions in the charter catch limit under the CSP level the playing field by tying both charter and commercial sectors more directly to resource abundance. As a result, the charter catch limit may drop in 2012, but as abundance increases so too will the charter catch limit. Because the CSP establishes a more timely system for adjusting management measures, charter bag and size limits will be liberalized more quickly under the CSP than would have been possible under the GHL. In effect, the CSP ensures that: “both the guided sport and commercial sectors w [ill] share in the benefits and costs of managing the resource for long-term sustainability under a combined catch limit.” 76 Fed. Reg. 44160 (July 22, 2011). The Council clearly identified this CSP policy objective and established a system that achieves it.

Inter-sector Transfer

The problem statement that guided the Council in developing the CSP identifies the instability caused by the lack of an effective charter allocation and identifies the need for a mechanism for transfer between sectors: “Unless a mechanism for transfer between sectors is established, the existing environment of instability and conflict will continue.” EA at 7. Dr. Lubchenco has identified the same problem with sector allocations in other fisheries and called for market-based solutions:

“I would like to see Councils phasing in mechanisms for inter-sector trading...I think trading can be a win-win, and can allow a more fluid (and less political) allocation process.

Dr. Jane Lubchenco, April 6, 2010 Recreational Saltwater Fishing Summit, http://www.nmfs.noaa.gov/sfa/PartnershipsCommunications/recfish/RecFishSummit/RecFishSummit_041610_LubchencoRemarks.pdf.

The CSP allows charter operators to lease QS from commercial fishermen. ALFA supports this provision. The transfer mechanism will afford charter operators the opportunity to invest in resource access and conservation the same way commercial fishermen invest to participate in the halibut fishery. If charter clients want to harvest a second halibut when a one halibut bag limit is in place, charter operators can

acquire the quota to provide that opportunity. The charter industry has frequently claimed that their clients place a high value on catching two halibut; if this claim is accurate, then those same clients are likely to pay extra for the opportunity to harvest an extra fish. If the demand is not high, then the obvious conclusion is that charter clients place a lower value on that second fish than the consumers who purchase commercially harvested halibut.

Some charter operators have stated the Guided Angler Fish (GAF) provision will require them to pay for fish they never harvest, therefore will be unworkable. This fear is unfounded. Commercial fishermen are allowed to “carry over” to the following season up to 10% of their annual allocation. This 10% can be contractually held in reserve for a charter operator to use as needed over the course of the season, with the understanding that any unused portion will be returned to the QS holder at the end of the charter season and any used portion will be paid for at an agreed upon rate. Current “hired skipper” and leasing arrangements in the commercial halibut fishery suggest the likely lease rate will be approximately 50% of the ex-vessel per pound value of the QS transferred. Since the average size halibut in the charter fishery is 20 pounds and the current average ex-vessel price \$4.50, a charter operator could expect to pay approximately \$45 per GAF. Again, if charter clients place sufficient value on harvesting the second halibut, that cost will be passed on from charter operator to willing client.

The existing provisions in the proposed rule GAF section relative to catch accounting are insufficient. Clearly the average size of GAF fish could differ from the average size of halibut harvested from the common pool, and definitely will differ if a maximum size limit is in place common pool halibut. GAF catch accounting must include weighing, or at minimum measuring and reporting the length of harvested halibut.

Maximum size limit and Harvest Projections

NMFS has asked for comment on the CSP methodology for selecting a maximum halibut size limit in the charter fishery when combined catch limits dictate the necessity. ALFA agrees that “conservation of the halibut resource should be a priority under the CSP.” 76 Fed. Reg. 44173 (July 22, 2011). Method B may result in some under harvest of the charter allocation but the lack of precision in charter catch accounting and management indicates the need to err on the side of conservation. ALFA supports Method B.

The CSP proposed rule describes the annual regulatory process that will be followed under the CSP. This process is graphically described in the EA on page xxi. As described, the current process stops after two charter harvest projections even if the projected catch falls outside the charter harvest range. Although not specified by the Council, reasonable logic would indicate the Council intended additional projections should be run with modified bag or size limits until an appropriate management strategy is identified. ALFA suggests the proposed rule and the EA be modified to accommodate this situation.

Some charter organizations recently requested that the Council consider adding additional tools to the charter management toolbox. If the Council deems this appropriate, action should only be considered as part of a trailing amendment and only AFTER the CSP is implemented.

Economic Impacts and Net National Benefits

ALFA's membership recognizes that resource conservation always trumps short-term economics, since long-term economic health depends on sustainable management. The primary goal of the CSP is conservation, as it should be, and we urge the Agency to maintain this focus. To quote from the proposed rule: "While NMFS intends for the CSP to accommodate the guided sport industry's need for predictability and sustainability, it believes conservation of the halibut resource should be a priority under the CSP." 76 Fed. Reg. 44173 (July 22, 2011).

Nevertheless, the economic misinformation spread by some charter sources must be dispelled. The CSP proposed rule comments submitted by the Halibut Coalition provide a wealth of economic impact information that should be used to improve the accuracy and balance of the EA/RIR/IRFA. Some of this information is emphasized or expanded on below, and establishes the economic importance of the commercial industry in general and the commercial halibut fishery in particular.

The economic benefit of the commercial sector within Alaska far outweighs the total economic benefit of the charter industry regardless of whether one considers total economic benefits or halibut specific benefits. The total sport fish industry economic output in Alaska in 2007, the most recent year for which data are available, was \$1.6 billion. The comparable number for the commercial fishing sector was \$5.8 billion. The tourism related jobs in Alaska from all tourist industries total 36,200. The comparable number for commercial fishing alone is 80,800. With respect to halibut specifically, under the most optimistic scenario, only \$200 million of the total \$1.6 billion of alleged sport fish economic output can be attributed to halibut in Areas 2C and 3A. For the commercial fishery, the comparable number for Areas 2C and 3A is \$478 million.¹ As these facts establish, actions that disadvantage the commercial sector, such as continuing status quo GHL management, have quantifiable negative economic impacts when compared to the CSP. The EA should be supplemented to include the regional and state-wide economic impacts of changes that affect the commercial fishery; it should also evaluate those changes relative to the status quo that has allowed charter overfishing.

The EA states that a true cost/benefit analysis would evaluate opportunity costs, or the willingness of the charter clients and commercial halibut consumers to pay more than they currently pay to access the halibut resource. Although such an exhaustive study is not currently available and would not remain definitive over time, trends in demand for charter or commercial services provide important insight.

The EA states the number of charter trips has declined significantly between 2008 and 2010 in both Areas 2C and 3A. EA at 51. While Area 2C charter fishermen try to fix the blame for this on regulatory changes designed to present their overfishing, bag and size limits have not changed in Area 3A. Yet,

¹ Economic Impacts and Contributions of Sport fishing in Alaska 2007 (Southwick Associates and Alaska Dept of Fish and Game Sport fish Division), The Seafood Industry in Alaska's Economy 2007 (Northern Economics).

both areas have experienced significant declines in demand. The only conclusion is that changing national economic conditions are the driving force behind the reduced demand for charter services, not regulatory issues. Meanwhile, the demand for commercially caught halibut keeps *increasing*, despite the economic “slow down,” a fact reflected in the strong upward trend in halibut ex-vessel price. 2010 ex-vessel halibut prices set records that were then promptly broken by 2011 prices. Consumers are hungry for commercially-caught halibut; the demand currently out-strips the supply. These statistics indicate an optimal allocation would meet these demand changes by *increasing* the commercial allocation. Instead, the CSP seeks to balance the needs of all sectors through a percentage-based allocation and to allow the market-based transfer system to adjust allocations in response to changes in demand.

In considering net national benefit, the “sharing” of the halibut resource by the public must be evaluated. Commercial fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude less “public” is served by the charter industry. Even at these low levels of abundance, the Area 2C and 3A commercial catch limits equate to roughly 9 million “finished” pounds of halibut, or 35 million halibut meals per year. One can assume that the average person does not eat halibut more than three times in a year, which translates to the commercial fishermen in these two areas annually providing access to the halibut resource for 9-10 million Americans plus another 2-3 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. EA at xxxvii. In sum, the commercial fishery provides 44 times more Americans access to the halibut resource, provides national economic benefit through export—and demand for commercially caught halibut is still increasing. The public access aspect of “catch sharing” clearly tips the allocation scales toward the commercial fishery.

Subsistence and Sport Impacts

The CSP problem statement ends with: *The Council seeks to address this instability, while balancing the needs of all who depend on the halibut resource for food, sport, or livelihood.* Over the 18 years the Council and NMFS have labored to develop an effective halibut charter management system, both bodies have received substantial and well-documented testimony from sport and subsistence fishermen as well as coastal communities that have suffered from the rapid and concentrated increase in charter harvest. Subsistence and sport fishermen have documented local depletion and the inherent dangers of attempting to access halibut from small skiffs once near-town areas have been fished out. Charter operators also documented local depletion in testimony calling for the charter limited entry program. Essential to sport and subsistence fishermen is that the CSP assigns the charter sector a fixed percentage of the resource that is applied to the combined charter and commercial catch limit, a number that is identified after subsistence and sport needs are accommodated. The fixed percentage ensures that the charter catch limit will be proportional to abundance; the new system of projecting charter harvest and using the predetermined management matrix to specify bag and size limits will prevent charter overages. Although these positive aspects of the CSP are discussed in the proposed rule and the EA, the

executive summary (p. xlii) and Appendix B section 8.6 include erroneous statements concluding the status quo and the preferred alternative are neutral in terms of impacts to subsistence and unguided sport fishermen. Overfishing has a clear and immediate negative effect on all who depend on the halibut resource. Local depletion has decreased the halibut fishing success rate for sport and subsistence fishermen and driven up safety risks and fuel costs. The EA should be amended to reflect the positive impacts of the CSP relative to the status quo.

ALFA members shares concerns raised by the IPHC and quoted in the EA at 63 relative to “leakage” between the charter and sport sectors. However, we identify the core problem as the growing practice of “assisted unguided” fishing where some members of the charter industry are again trying to avoid responsibility for conservation. Some charter lodges are now using a charter vessel to lead a fleet of “unguided” vessels to the fishing grounds and then call directions to the “unguided” fishermen regarding how to select and operate fishing gear; in at least one instance in Wrangell, a guided boat is towing skiffs (without guides) to the fishing area and directing the effort. This obvious attempt to circumvent charter regulations identifies a loophole in the definition of “guided fishing” that should be fixed by action of NMFS and the Alaska State Legislature.

Conclusion

ALFA supports the halibut CSP proposed for Areas 2C and 3A. The CSP culminates 18 years of analysis and public involvement in developing an effective halibut charter management plan. The CSP achieves essential conservation and management goals by establishing a clear abundance-based allocation for the charter sector and creating a timely regulatory process to prevent charter overages. The CSP accommodates charter demands for a continuous season of historic length, management stability, and the opportunity for growth while still protecting the historic and cultural dependence of subsistence, sport and commercial fisheries. The CSP corrects existing allocation inequities by more fairly sharing the burden of resource conservation. The CSP responds to public demand for access to the halibut resource by allocating the resource between charter and commercial sectors but allowing a market-based mechanism for transfer between sectors. In sum, the CSP addresses the problems identified by the Council and does so in an innovative, effective and equitable manner. On behalf of ALFA’s membership, I urge timely publication of the final rule and 2012 implementation of the CSP in Areas 2C and 3A.

Thank you for the opportunity to comment.

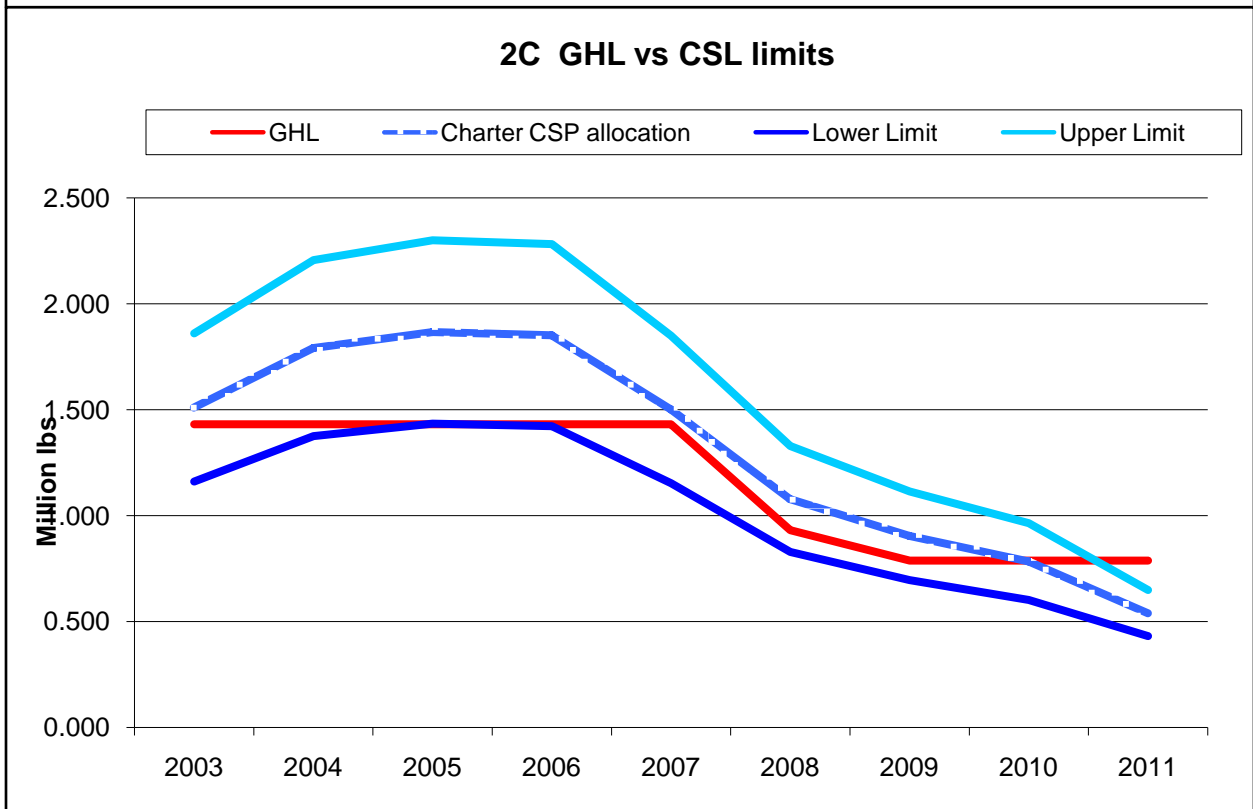
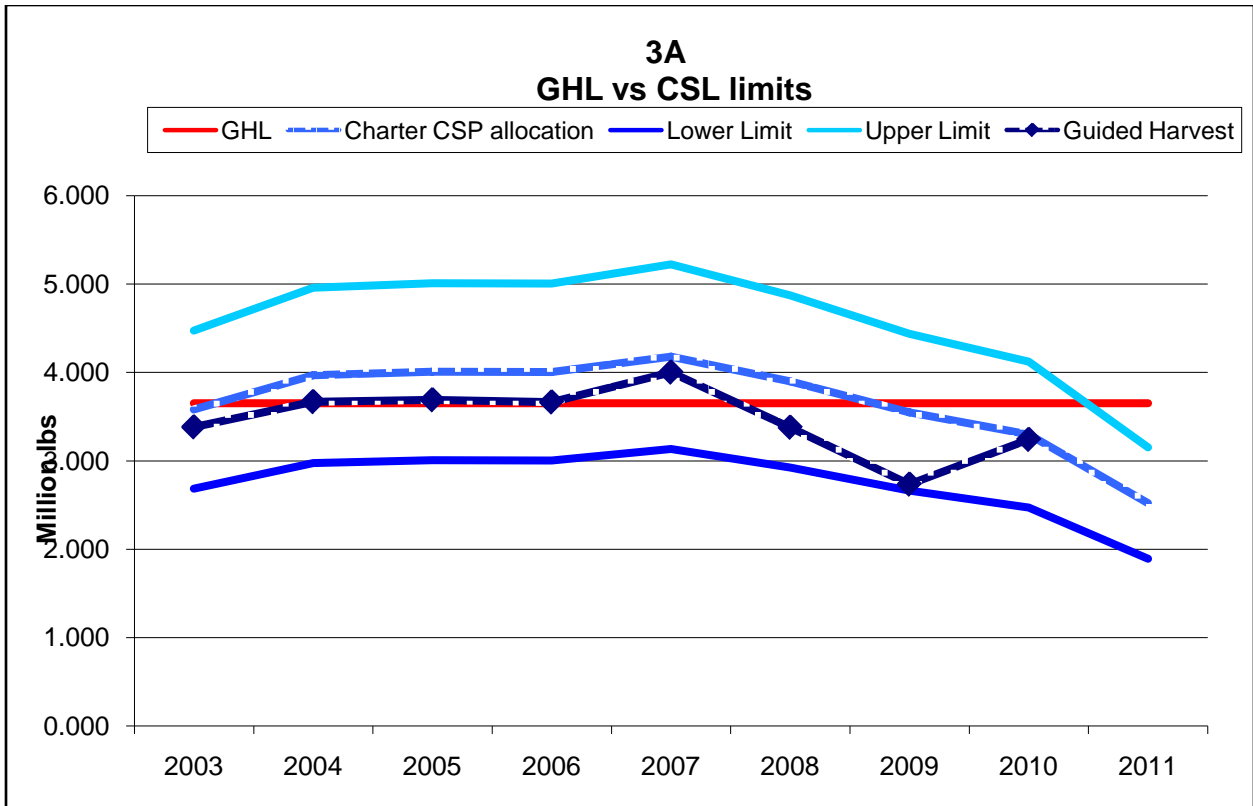
Sincerely,



Linda Behnken
(Executive Director, ALFA)

Attachment

Appendix A: CSP Limits compared to GHL



**2C CSP
Data**

Year	Commercial Limit	Charter deduction	Combined Catch limit	GHL	CSP rule	Charter CSP allocation	Lower Range	Upper Range	Lower Limit	Upper Limit
2003	8.500	1.501	10.001	1.432	15.1%	1.51	11.6%	18.6%	1.16	1.86
2004	10.530	1.333	11.863	1.432	15.1%	1.79	11.6%	18.6%	1.38	2.21
2005	10.930	1.437	12.367	1.432	15.1%	1.87	11.6%	18.6%	1.43	2.30
2006	10.630	1.639	12.269	1.432	15.1%	1.85	11.6%	18.6%	1.42	2.28
2007	8.513	1.432	9.945	1.432	15.1%	1.50	11.6%	18.6%	1.15	1.85
2008	6.210	0.931	7.141	0.931	15.1%	1.08	11.6%	18.6%	0.83	1.33
2009	5.200	0.788	5.988	0.788	15.1%	0.90	11.6%	18.6%	0.69	1.11
2010	4.400	0.788	5.188	0.788	15.1%	0.78	11.6%	18.6%	0.60	0.96
2011	2.330	0.788	3.118	0.788	17.3%	0.54	13.8%	20.8%	0.43	0.65

3A

Year	Commercial Limit	Charter deduction	Combined Catch limit	GHL	CSP rule	Charter CSP allocation	Lower Range	Upper Range	Lower Number	Upper Number	Guided Harvest
2003	22.630	2.943	25.573	3.650	14.0%	3.58	10.5%	17.5%	2.69	4.48	3.382
2004	25.060	3.279	28.339	3.650	14.0%	3.97	10.5%	17.5%	2.98	4.96	3.668
2005	25.470	3.161	28.631	3.650	14.0%	4.01	10.5%	17.5%	3.01	5.01	3.689
2006	25.200	3.414	28.614	3.650	14.0%	4.01	10.5%	17.5%	3.00	5.01	3.664
2007	26.200	3.650	29.850	3.650	14.0%	4.18	10.5%	17.5%	3.13	5.22	4.002
2008	24.200	3.650	27.850	3.650	14.0%	3.90	10.5%	17.5%	2.92	4.87	3.378
2009	21.700	3.650	25.350	3.650	14.0%	3.55	10.5%	17.5%	2.66	4.44	2.734
2010	19.900	3.650	23.550	3.650	14.0%	3.30	10.5%	17.5%	2.47	4.12	3.24
2011	14.360	3.650	18.010	3.650	14.0%	2.52	10.5%	17.5%	1.89	3.15	