# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0118** (RTC-57828) |
| **Related Incident ID** | IM465344 |
| **RFC Initiator / Organization** | TAXUD/B3 |
| **CI** | NCTS-P5 (DDNTA-5.14.1-v1.00 Main Document) |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | |  | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes No** |

***Change Summary***

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| **DDNTA-5.14.1-v1.00 (Main Document): No IE024 needs to be sent to the NA that sent the IE006 but did not sent the IE118, nor in case of national diversion.** |
| The IE024 shall be sent in case of international diversion except when it involves an Office of an NA from where an IE006 has already been received by the Office of Departure. No IE024 is needed in case of “clean” National diversion (IE118 sent by Actual Office of Transit located in same county as the Declared Office of Transit; similar for IE168). |

**Section 2: Problem statement**

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| As a general rule the IE024 is sent to   * the declared Office(s) of Transit that received the IE050 but did not send the IE118 * the actual Office(s) of Transit that received the IE115 but did not send the IE118 * the declared Office(s) of Exit for Transit that received the IE160 but did not send the IE168 * the actual Office(s) of Exit for Transit that received the IE165 but did not send the IE168 * the declared Office of Destination that received the IE001 but did not send the IE006   when the transit movement arrives at the Actual Office of Destination (i.e. the Office of Departure receives the IE006 message).  The following exceptions need to be documented. No IE024 shall be sent when:   * a message IE118 was received from the country of the declared Offices of Transit that received the IE050 but did not send the IE118 * a message IE118 was received from the country of the actual Offices of Transit that received the IE115 but did not send the IE118 * a message IE168 was received from the country of the declared Offices of Exit for Transit that received the IE160 but did not send the IE168 * a message IE168 was received from the country of the actual Offices of Exit for Transit that received the IE165 but did not send the IE168 * the message IE006 was received from the country of the declared Office of Destination that received the IE001 but did not send the IE   This clarification should prevent the exchanges of IE906 (out of sequence) on the Common Domain, as observed in NCTS-P4 operations. |

**Section 3: Description of proposed solution**

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| The following update will be performed into the **DDNTA-5.14.1-v1.00 (Main Document)** (changes are depicted in red colour):   1. **The following paragraph and note in section “III.II.2.8 T-TRA-DEP-A-020 - ‘Open’ ATR Response C\_ATR\_RSP (IE115) is closed” will be updated as follows:**   **[Step 21]** The Office of Departure then sends the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) to the respective Office of Transit, that has previously received the positive ‘Anticipated Transit Record Response’ C\_ATR\_RSP (IE115) message from the Office of Departure but didn’t reply back with the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) message to the Office of Departure. However, no ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) shall be sent by the Office of Departure in case this Office of Transit is located in the country from which   * a ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) message was received, or * an ‘Arrival Advice’ C\_ARR\_ADV (IE006) message was received.   […]  *NOTE: The same approach of sending the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) is followed in case of ‘open’ ‘Anticipated Exit For Transit Record Response’ C\_AXR\_RSP (IE165) message at Office of Exit for Transit or ‘open’ ‘Anticipated Arrival Record Response’ C\_AAR\_RSP (IE003) message at Office of Destination that have never been used, meaning that no ‘Notification Leaving Security Area’ C\_LSA\_NOT (IE168) message or ‘Arrival Advice’ C\_ARR\_ADV (IE006) message has been received by these Offices respectively. However, no ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) shall be sent by the Office of Departure in case this Office of Exit Transit belongs to the same National Administration where the movement arrived and thus an ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received. The same applies (no* ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) *needs to be sent) where even though the IE002/IE003 are exchanged, the* ‘Arrival Advice’ C\_ARR\_ADV (IE006) *is eventually received by a different Office of Destination within the same National Administration.*   1. **The following paragraphs in section “III.II.3.1.2 T-TRA-TRT-A-004-Control by Office of Transit with Passage Not Confirmed” will be updated as follows:**   **[Step 18]** The ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) is sent to the declared Office of Transit since   * no ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) has been previously received from the country where this Office is located, and * this declared Office of Transit does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received.   Upon reception of the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024), there is no state update of the movement at the Office of Transit. It remains [Movement stopped](#_Office_of_Transit). This is a final state. The state of the movement at the Office of Departure is [Arrived](#_Office_of_Departure_1).  **[Step 19]** The ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) is also sent to the declared Office of Destination in case this declared Office of Destination does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received. The state of the movement at the declared Office of Destination is set to [Arrived](#_Office_of_Destination) and the state of the movement at the Office of Departure is [Arrived](#_Office_of_Departure_1).   1. **The following paragraph and note in section “III.II.3.1.3 T-TRA-TRT-A-010-Transit Declaration having Office of Destination being also Office of Transit” will be updated as follows:**   **~~[Step 19]~~** In this exceptional case, ~~since~~ despite the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) was sent by the Office of Transit but never received by the Office of Departure, the Office of Departure ~~sends~~shall not send the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) to this Office of Transit (which also acts as the Office of Destination) since the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received from the same Office that also acts as Office of Transit (and thus belongs to the same National Administration).  The flow continues from [Step 19] of T-TRA-CFL-M-001-Standard Transit Procedure (overview).  *~~IMPORTANT: The complexity of this scenario is that the Actual Office of Destination must be able to send the ‘Destination Control Results’ C\_DES\_CON (IE018) even after the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) was sent to the Office of Transit (having Office of Transit = Office of Destination) (i.e. the movement is put in final state at the Office of Transit).~~*   1. **The following paragraph in section “III.II.3.1.4.1 T-TRA-TRT-A-002-Diversion at Office of Transit accepted” will be updated as follows:**   **[Step 20]** The Office of Departure will send then the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) to the Declared Office of Transit, unless it belong to the same National Administration   * where the transit movement arrived, or * that sent a message IE118 following a National diversion at Office of Transit.   It should be stressed that the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) must only be sent to those (declared/actual) Office(s) of Transit that did not send the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118)]. The ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) ~~should NOT~~shall NOT be sent to those Office(s) of Transit that reported the movement by means of the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118).   1. **The following paragraph in section “III.II.3.2.3 T-TRA-TRT-A-006-Movement stopped at Customs Office of Exit for Transit” will be updated as follows:**   **[Step 17]** The timer [T\_Await\_Arrival\_Advice](#T_Await_Arrival_Advice) stops.  The Office of Departure then disseminates the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) to the **[Step 18]** countries with declared Office(s) of Exit for Transit (which have not sent the IE168 and are different from the country from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received), **[Step 19]** countries withdeclared Office(s) of Transit (which have not sent the IE118 and are different from the country from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received) **[Step 20]** and to the declared Office of Destination that does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received.  The ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) is sent only once if more than one involved Customs Office in the transit movement belongs to the same country.   1. **The following paragraph in section “III.II.3.2.4.2 T-TRA-TRT-A-009-Diversion at Customs Office of Exit for Transit – Movement stopped at the border of Office of Exit for Transit” will be updated as follows:**   **[Step 19]** Upon reception of the ‘Arrival Advice’ C\_ARR\_ADV (IE006) from the Office of Departure, the timer [T\_Await\_Arrival\_Advice](#T_Await_Arrival_Advice) stops. The state of the movement at the Office of Departure is set to [Arrived](#_Office_of_Departure_1).  Upon reception of the ‘Arrival Advice’ C\_ARR\_ADV (IE006) from the Office of Departure, the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message is sent to **[Step 20]** the Declared Office of Destination [which have not yet transmitted the ‘Arrival Advice’ C\_ARR\_ADV (IE006) and does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received], to **[Step 21]** the Declared Office of Exit for Transit [which have not yet transmitted the ‘Notification Leaving Security Area’ C\_LSA\_NOT (IE168) and does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received] and to **[Step 22]** the Declared Office of Transit [which have not yet transmitted the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) and does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received].   1. **The following paragraph in section “III.II.4.8.1 T-TRA-DES-A-009-Diversion at Office of Destination accepted” will be updated as follows:**   **[Step 20]** The Office of Departure then notifies the Declared Office of Destination of the arrival of the consignment at another Office of Destination by sending the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024), in case the Declared Office of Destination does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received.   1. **The following paragraph and note in section “III.II.6.5 T-TRA-EXC-A-004-NCF not received” will be updated as follows:**   **[Step 19]** The Office of Departure sends the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message to the Office of Transit since the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) has never been received from that country and in case this Office of Transit does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received.  […]  *NOTE: If the Office of Departure has not received the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) from the Office of Transit, it will notify the Office(s) of Transit (from where the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) was expected but has not been received) of the arrival (and acceptance) of the consignment with the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024). Since the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) is received in final state (i.e.* [*NCF registered*](#_Office_of_Transit)*), the Office of Transit should not reject it with the ‘Functional NACK’ C\_FUN\_NACK (IE906) message but ignore it. However, no ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) shall be sent by the Office of Departure in case this Office of Transit belongs to the same National Administration where the movement arrived and thus an ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received.*   1. **The following paragraph and note in section “III.II.6.7 T-TRA-EXC-A-006-Notification leaving security area not received” will be updated as follows:**   **[Step 19]** The Office of Departure sends the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message to the Office of Exit for Transit since the ‘Notification Leaving Security Area’ C\_LSA\_NOT (IE168) has never been received. However, no ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) shall be sent by the Office of Departure in case a message IE168 was already received from the actual Office of Exit for Transit located in the same country.  […]  *NOTE: In this case, the Office of Departure will notify the Office(s) of Exit for Transit (from where the ‘Notification Leaving Security Area’ C\_LSA\_NOT (IE168) message was expected but has not been received) of the arrival (and acceptance) of the consignment with the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message only in case the declared and actual Office(s) of Exit for Transit do not belong to the same National Administration. Since the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message is received in final state (i.e.* [*Movement left Security Area*](#_Office_of_Exit)*), the Office of Exit for Transit should not reject it with the ‘Functional NACK’ C\_FUN\_NACK (IE906) message but ignore it.*   1. **The following paragraph in section “III.II.7.1.3 T-TRA-EFT-M-003-Core flow of the export followed by transit - Internal transit (Inappropriate Office of Destination)” will be updated as follows:**   **[Step 29]** The Office of Departure notifies the Declared Office of Destination with the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message only in case the Declared Office of Destination does not belong to the same National Administration from where the ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received. The state of the movement at the Declared Office of Destination is set to [Arrived](#_Office_of_Destination).   1. **The following paragraph in section “III.IV.2.1.5 T-ENR-ENQ-A-005-Sufficient information–Enquiry with movement unknown at Destination–Holder of the transit procedure contacted” will be updated as follows:**   All the Offices involved in the transit movement (declared and actual), from which the ‘Notification Leaving Security Area’ C\_LSA\_NOT (IE168) and/or the ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) message(s) have not been received and no ‘Arrival Advice’ C\_ARR\_ADV (IE006) has been received from the same National Administration where these Offices belong, are informed by the Office of Departure. The Office of Departure sends the ‘Forward Arrival Advice’ C\_FWD\_ARR (IE024) message:   * **[Step 25]** To the Office of Exit for Transit:   Upon reception of the ‘Forward Arrival Advice’ C\_FWD\_ARR (IE024) message, the state in the Office of Exit for Transit is set to [Arrived](#_Office_of_Exit);   * **[Step 26]** To the Office of Transit:   Upon reception of the ‘Forward Arrival Advice’ C\_FWD\_ARR (IE024) message, the state in the Office of Transit is set to [Arrived](#_Office_of_Transit);   * **[Step 27]** To the Office of Destination:   Upon reception of the ‘Forward Arrival Advice’ C\_FWD\_ARR (IE024) message, the state in the Office of Destination is set to [Arrived](#_Office_of_Destination).  **[Step 28]** The timer [T\_Recovery\_Recommended](#T_Recovery_Recommended) stops.  The business process of the transit operation ends here.   1. **The following paragraph in section “III.V.1.2 Office of Departure (after movement release)” will be updated as follows:**   […]   * ‘Arrival Advice’ C\_ARR\_ADV (IE006) is received from the Office of Destination. The status of the movement will then be set to “Arrived”. In case diversions took place at Office of Transit or Office of Exit for Transit or Office of Destination, a ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) will be sent to all countries (except the country of destination actual) with declared Office(s) that did not report the movement. The same applies (no IE024 to be sent) when the Actual Office of Destination (where the transit movement is presented) belongs to the same National Administration as the Declared Office of Destination.  1. **The following paragraphs in section “III.V.2 Office of Transit STD” will be updated as follows:**   In case of international diversion from the pre-defined itinerary at Office of Transit occurs during the journey of the movement and the consignment reports to another Office of Transit instead of the declared based on the declaration data, the declared Office of Transit will receive the ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message, provided that no ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) message has been previously sent by that declared Office of Transit. The ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) message will be sent to the Declared Office of Transit when the movement arrives at the Office of Destination and notifies the Office of Departure with the ‘Arrival advice’ C\_ARR\_ADV (IE006) message. No ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) shall be sent when:   * the Declared Office of Transit belong to the same National Administration as the Actual Office of Destination where the transit movement is presented, * a ‘Notification Crossing Frontier’ C\_NCF\_NOT (IE118) message has been received after national diversion.   In that case, the state of the movement at the Declared Office of Transit will be set to “Arrived”.  If the consignment does not pass the declared Office of Transit, the Office of Departure will inform the declared Office of Transit upon the arrival of the consignment at the Office of Destination, by means of a ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024). The status will then be marked as “Arrived”.  However, if the movement is stopped at the Office of Transit, and this Office authorizes the transit movement to end its journey to this country, then this Office becomes Actual Office of Destination. ~~Even though the~~In that case no ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) ~~is~~need to be sent to the Declared Office of Transit, the status of the movement will remain “Movement stopped”. Again, the role of the Office of Transit stops here.   1. **The following paragraph in section “III.V.3 Office of Destination STD” will be updated as follows:**   In case of international diversion, the consignment will never arrive at the declared Office of Destination. The message ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) will then be sent to the declared Office of Destination (in case of national diversion, no ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) shall be sent). In that case, the status will be set to “Arrived”. It should also be mentioned that when the Actual Office of Destination receives the positive ‘Anticipated Arrival Record Response’ C\_AAR\_RSP (IE003), the state of the movement changes from “AAR requested” to “Arrival Accepted”. In case the Declared Office of Destination receives a ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) the movement reaches the final state “Arrived”.   1. **The following paragraph in section “III.V.4 Office of Exit for Transit STD” will be updated as follows:**   After international diversion, when consignment arrives at its actual destination, a notification message ‘Forwarded Arrival Advice’ C\_FWD\_ARR (IE024) will automatically be sent by the Office of Departure to the declared Office of Exit for Transit, informing that the movement left the Security Area from a different Office of Exit for Transit. In that case, the state is set to “Arrived”.  **IMPACT ASSESSMENT**  **No impact on External Domain.**  This RFC-Proposal is considered as a ***significant* improvement** of the DDNTA-5.14.1-v1.00 (Main Document). **The logic is the continuation of the change RFC\_NCTS\_0117 (making a distinction between national diversion and international diversion) already applied in operations by some countries** (the different logic applied in NCTS-P4 is visible today in CS/MIS and requires clarification in NCTS-P5).  The **Functional Specifications (FSS/BPM)-v5.30 also needs to be updated**, to reflect precisely the above explanations.  While this RFC-Proposal may require adaptations of few NTAs operating in NCTS-P5 or under NCTS-P5 Conformance Testing), it is considered that the change proposed has no impact on business continuity and **likely a limited impact** on the Common Domain. Consequently, it can be deployed in a **semi-flexible way**.  More specifically:   * If the Office of Departure is (NCTS-P4 or ‘NCTS-P5 not aligned with the RFC-Proposal’) and the other involved countries are aligned with this RFC-Proposal,   then the **IE024 message will be redundant** (and possibly rejected by the NA were a national diversion occurred (without blocking the movement);   * If the Office of Departure is (‘NCTS-P5 aligned with the RFC-Proposal’) and the other involved countries are ‘NCTS-P4’ or ‘NCTS-P5 not aligned with the RFC-Proposal’),   then the **IE024 message will not be sent** in case of “national diversion with IE118/IE168 not sent” **but expected by some NTAs**. This may lead to a number of movements properly managed at Departure, but remaining open in the countries not managing locally the national diversion; with a possible impact on the **volume of to-be-archived open movements**.   * If a movement was initiated under the previous DDNTA (DDNTA 5.14.1-v1.00) release and continues its flow under the new DDNTA (DDNTA 5.15.0) release (open movement), no major issue other than what is mentioned in the previous bullet (i.e. where the sender (Office of Departure) has not implemented the change).   **Proposed** date of applicability in Operations (T-Ops): By 1.12.20**22** or when starting NCTS-P5 (**semi-flexible**)  **Proposed** date of applicability in CT (T-CT): July 2022  **Expected** date of approval by ECCG (T-CAB): January 2022  **Impact on transition P4-P5**: None  **Consequence of not approving the RFC-Proposal**: In case of national diversion, the exchange of IE024 and the processing of the IE024 will remain not harmonized, creating some problems to get the movement properly closed.  **Risk of not implementing the change**: Medium.  Impacted IEs:  - None  Impacted CI Artefacts:  **- Functional Specifications (FSS/BPM)-v5.30: Yes;**  **- DDNTA-5.14.1-v1.00 (Main Document): Yes;**  **- NCTS\_CTP-5.7.0-v1.00: Yes;**  **- NCTS\_TRP-5.7.5-v1.00: Yes;**  - UCC IA/DA Annex B: No;  - DDCOM-20.3.0-v1.00: No;  - DDNTA-5.14.1-v1.00 (Appendix Q2\_R\_C, PDFs): No;  - CSE-v51.6.0: No;  - DMP Package-5.6.0 SfA-v1.00: No (incl. update of file Rules and Conditions\_v0.43): No;  - CTS-5.6.1-v1.00: No;  - ACS-v5.5.0 & ACS-Annex-NCTS: 5.5.0: No;  - ieCA 1.0.1.0: No;  - CRP-5.5.0-v1.00: No;  - CS/MIS2\_DATA: No;  - CS/RD2\_DATA: No;  - AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No. |

**Impact on CI artefacts**

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| **DDNTA-5.14.1-v1.00, Main Document** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in Section 3 - Proposed Solution** | |
| **Functional Specifications (FSS/BPM)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The textual descriptions described in the Section 3 will be also transposed to the text of the *FSS-UCC NCTS Section I-BUSINESS PROCESS THREADS FOR CORE BUSINESS* and of the BPM.** | |
| **NCTS\_CTP-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The Proposed Solution will be transposed in some scenario, to provide detailed example for testing (documenting precisely the differences between national vs international diversins).** | |
| **NCTS\_TRP-5.7.5-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Distinction between national diversion and international diversion will be applied in the sequence of messages, in the TC notes and in the datasets.** | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The logic that defines the exchanges of IE024 on the Common Domain and on the National Domain needs to be adapted.** | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 24/11/2021 |  |
| v0.11 | SfR to NPMs | 29/11/2021 |  |
| v1.00 | SfA to NPMs | 25/02/2022 | *SfA to NPM* |
| v1.10 | SfA updates | 06/04/2022 | *Updates in magenta as per APO* |