**Season 18  
—  
Debating the 2017-2018 Stoa Policy Resolution**

Policy debaters must have a solid understanding of the history of the year’s topic of study. The purpose of this article is to give competitors the underlying knowledge of that history while relating it to the following resolution:

**“Resolved: The United States federal government should   
substantially reform its transportation policy.”**

**Table of Contents**

History of US Transportation Policy 2

Early History 3

The Interstate Highway System 5

Automobile Safety 6

Air Travel 7

Mass Transit 9

Ships and Barges 10

Railroads 11

Intersection of Transportation and Energy Policy 12

Intersection of Transportation and Environmental Policy 13

Worksheet: History of US Transportation Policy 14

Answers 16

*Content collected and written by Vance Trefethen. Chris Jeub wrote the worksheets at the end of the essay.*

History of US Transportation Policy



Stoa’s 2017-2018 Policy Resolution:

“Resolved: The United States federal government should substantially reform its transportation policy.”

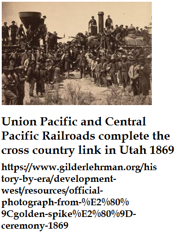
This year’s Stoa resolution calls our attention to federal transportation policies. It’s a topic that is often in the news and that has substantial impact on our everyday lives, since most of us use some form of transportation almost every day.

The US Constitution mentions a federal role in building “post roads” along with its responsibility for operating a post office in Article 1 Section 8 Clause 7. Many forms of transportation operate across state lines or international boundaries and fall under the jurisdiction of the federal government in its authority to regulate interstate and foreign commerce in Article 1 Section 8 Clause 3. And even in transportation occurring locally, the federal government often has a say in it by conditions it places on funding grants given to the States to pay for their local transportation infrastructure.

Early History

The large size of our nation, even in its infancy, made transportation a key factor in the growth and development of the country. Without modern technology, there were only three modes of transportation when our nation was formed: walking, animal power, and boats. Coastal and river port cities had every incentive to be attractive to boating, since a port could bring trade and business and its accompanying prosperity. But once people and goods got to the port, how did they move about inland? North America was covered with forests and mountains, and movement in the interior was slow and difficult. Many early roads in those days were built by private businesses, who recouped their investment by the collection of tolls.

“Road construction was one of the first improvements in American infrastructure. Major cities in the northeast were often connected by post roads, which at first were little more than dirt trails but later were improved with gravel or wooden planks. Travel on these roads was slow going - the trip from Boston to New York, for example, could take up to 3 days by stage coach. In 1806, Congress allotted funds for the national road, the first federally funded road. It stretched from Cumberland, Maryland to, eventually, southern Illinois.”[[1]](#footnote-2)

Canals also played an important role in the economic development of the United States in the early 1800s. The most famous of these, the Erie Canal, linked the Great Lakes to New York City via the Hudson River. Denied federal funding, its developer instead got the state of New York to pay for it. It proved extremely profitable and sped up settlement of what was then the open Northwestern region of the country (Ohio, Indiana and Illinois), in addition to inspiring the construction of many other canals in the years following. We should also make mention of the Panama Canal, built by the United States between 1904-1914 and still a key player in global transportation today, though no longer under the control of the U.S.

But the age of the domestic canal within the U.S. mainland lasted only a few decades before a faster and more efficient mode of transportation came onto the scene and replaced it. By 1860 most of the canals had become unprofitable because of the advent of the railroad. In 1869, railways finally linked the country from coast to coast, making rapid economical travel throughout the country a reality for the first time. This landmark event occurred with the assistance of federal subsidies.

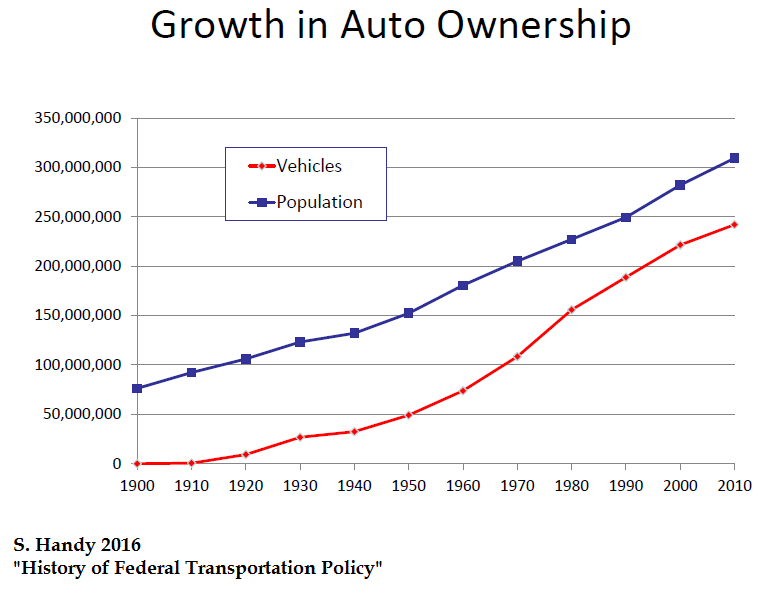
“The Pacific Railway Act, which became law on July 1, 1862, offered government incentives to assist “men of talent, men of character, men who are willing to invest” in developing the nation’s first transcontinental rail line. Authorizing the Union Pacific and the Central Pacific railroad companies to construct the lines, the legislation provided government bonds to help fund the work, in addition to vast land grants.”[[2]](#footnote-3)

Another mode of transportation became popular in the years just before the start of the 20th century, which led to public lobbying for smooth paved roads. It was, of course, the bicycle. Bikes were thought, at the time, to be the next revolutionary wave in private transportation, and its new devotees persuaded cities to invest in road infrastructure to support it.

“It is safe to say that few articles ever used by man have created so great a revolution in social conditions as the bicycle…Lord Charles Beresford once said, “Whoever invented the bicycle deserves the thanks of humanity,” and no expression was more fit. The bicycle has been the means of bringing out for exercise in the open air millions of persons, men and women, young and old, who otherwise would have confined themselves to homes, stores and offices…The very wide use of the bicycle led to the formation of the League of American Wheelmen, with memberships, at one time, of more than 100,000; and this organization started the agitation for better roads, which led, in many states, to great improvements in public highways.”[[3]](#footnote-4)

Paved smooth publically-maintained roads proved to be beneficial for an even more advanced form of personal transportation being developed in the early 20th century: the automobile. Mass production of automobiles in the 1920s, as Henry Ford discovered, made them affordable to the common man. Their convenience and feeling of independence made them popular, and they quickly began replacing bicycles and animal power for personal conveyance. But the rapid introduction of cars led to a rapid need for roadways on which to drive them.

“Cities took responsibility for their own roads, taxing adjacent property owners to fund improvements. States and the federal government took the lead in outlying areas where some roads made travel nearly impossible. In 1916, Congress realized the importance of good roads to the nation’s economy and allocated millions to improve them. States matched the funds with money raised from gas taxes, setting off a highway building boom across the country. The nation’s first superhighway—the Pennsylvania turnpike—opened in 1940. The four-lane toll highway set the standard for the future.”[[4]](#footnote-5)



The Interstate Highway System

Though otherwise filled with evil, the Nazi regime in Germany did manage to implement one social reform in the 1930s that proved highly beneficial: a high-speed, limited access highway system (the “autobahn”). Germany’s highways were efficient at moving civilians, commerce and military vehicles rapidly across their nation. Gen. Dwight Eisenhower, commander of US forces in Europe during World War 2, noted these advantages and advocated construction of a similar roadway system in the United States when he became President in the 1950s. While there had been some discussion and even preliminary legislation as early as the 1930s, it took Pres. Eisenhower’s advocacy to get a comprehensive plan through Congress. That happened when Congress passed the Federal-Aid Highway Act of 1956, which began construction of the modern US interstate highway system.

“Congress provided revenues from the federal gasoline tax to provide 90 percent of the cost of the construction of the interstates with the states picking up the remaining 10 percent. The technical standards for the highways were highly regulated—lanes had to be 12 feet wide and shoulders 10 feet wide, the bridges had to have 14 feet of clearance, grades had to be less than 30 percent, and the highway had to be designed for travel at 70 miles an hour. The most notable attribute of the system is the limited access concept. The 42,000-mile system only has approximately 16,000 interchanges. The interstate system has had an enormous and lasting impact on the social and economic fabric of the nation, even as it has provided, as Eisenhower hoped, a system of highways that might be needed to move materiel and troops in time of war.”[[5]](#footnote-6)

Automobile Safety

If a device came onto the market today that killed 40,000 people every year,[[6]](#footnote-7) it would probably be banned. But because the automobile has become such an integral part of our culture and economy, we accept the risk and try to mitigate it. Happily the death rate (percentage of people killed and number of deaths per mile traveled) has declined dramatically in the last generation.[[7]](#footnote-8)

Improved safety practices (some government-mandated, others developed by industry) along with improved driver awareness have made driving safer in the US. For example, federal rules requiring cars to be equipped with seat belts in 1966 gave motorists a better chance of survival during car wrecks. But it wasn’t until popular culture accepted and widely adopted their use in the 1980s (and states started passing mandatory seat belt laws) that substantial numbers of lives were saved. In 1998, the federal government mandated air bags in all cars, and experts estimate they have saved thousands of lives as well.[[8]](#footnote-9)

Air Travel

The first scheduled airline passenger service in the U.S. began in 1926.[[9]](#footnote-10) After World War 2, as air travel became more and more common, it became clear that the patchwork of local air traffic control systems could not manage the increasing amounts of traffic, particularly when flights went across unpopulated and unmonitored areas of the country.

“Despite steadily improving air traffic control, a series of airliner accidents over five months in 1951-52 aroused public concern. Although not related to air traffic control, the accidents led to an accelerated program of technical development and promoted new discussions on safety and traffic control. Air traffic growth in the 1950s led to severe airport congestion and delays. In 1956 two airliners collided over the Grand Canyon. Two more midair collisions occurred in 1958 and another in 1960.”[[10]](#footnote-11)

Congress passed the Federal Aviation Act of 1958, in which they nationalized the air traffic control system and created the Federal Aviation Agency (later renamed the Federal Aviation Administration).

“Under the act, the FAA became responsible for all the following:

* Regulating air commerce to promote its development and safety and to meet national defense requirements
* The use of navigable airspace in the United States and regulating both civil and military operations in that airspace in the interest of safety and efficiency
* Promoting and developing civil aeronautics, which is the science of dealing with the operation of civil, or nonmilitary, aircraft
* Consolidating research and development with respect to air navigation facilities
* Installing and operating air navigation facilities
* Developing and operating a common system of air traffic control and navigation for civil and military aircraft
* Developing and implementing programs and regulations to control aircraft noise, sonic booms, and other environmental effects of civil aviation”[[11]](#footnote-12)

Starting in the early 1960s, an epidemic of airline hijackings forced changes in American aviation policies and attitudes. Between May, 1961 and January, 1973, nearly 160 airplanes were hijacked in American airspace, many of them diverted to Cuba by deranged souls hoping to find a haven in the new socialist paradise.[[12]](#footnote-13) In 1969, the FAA started taking new efforts to prevent hijackings, and by the early 1970s airports began using metal detectors and x-ray machines to screen passengers and baggage. Mandatory physical screening of all passengers was implemented in January, 1973.

The 9/11/2001 terrorism incidents brought airline security to a whole new level. The federal government took control of airport security nationwide, creating the Transportation Security Administration (TSA) and implementing many new airport screening procedures and regulations.

Another major milestone in US air travel history was the Airline Deregulation Act, signed by Pres. Jimmy Carter in 1978. Prior to that time, the federal government heavily regulated fares and routes, and often blocked new airline startups. Existing airlines didn’t mind, because the rules limited competition and guaranteed extra profits. The emergence of a free market in the 1980s radically changed the US airline industry forever.

“The Deregulation Act eventually dissolved the Civil Aeronautics Board (CAB), which regulated U.S. airlines like a public utility, setting where they could fly and what fares they could charge. Without the CAB’s guaranteed rate of return, many storied airlines – Pan Am, Eastern Air Lines, Braniff International – found they couldn’t compete in the new world of open markets and eventually were consigned to the dustbin of aviation history. Before Deregulation, airlines competed on service alone, as fares were regulated by the government. Many remember this era fondly as the “golden age of aviation,” when stewardesses—as flight attendants were then known—carved chateaubriand on rolling silver carts and airlines put piano lounges in the upper decks of their Boeing 747s. Passengers dressed up to board flights, and flying was glamorous and exciting—and mainly for the rich.”[[13]](#footnote-14)

Mass Transit

Public mass transit horse-drawn buses and similar vehicles were found in US cities as early as the 1820s. Cable cars came onto the scene in 1868, followed by electric streetcars in the 1880s. They began changing the urban and suburban landscape by allowing people to live out near the extensions of the transit lines, rather than being crowded in dense downtown housing close to their place of work. Subways soon followed, beginning in 1897 in Boston, then in other major cities in the 20th century.

“Through the mid-20th century, private transit companies served the vast majority of American cities. After World War II, these companies operated profitable, if declining, businesses in the face of rising automobile ownership. A handicap was that transit companies were considered public utilities and highly regulated. They had to seek government permission for route changes, fare increases, and other service changes. By 1950, buses were recognized as a less expensive, more flexible, and safer transit mode than streetcars or most other types of rail transit. The beginning of the end for private transit came in 1964 with the Urban Mass Transit Act. The act promised federal capital grants to public agencies that took over private transit companies. Within a decade, the private transit industry was virtually wiped out, replaced almost completely by tax-subsidized public agencies.”[[14]](#footnote-15)

Ships and Barges

Ocean-going shipping vessels initiated the settlement of the colonies that became the United States and continue to play a large role in transportation today. Since the founding of our nation, Congress has actively regulated sea transportation. Laws signed by Pres. George Washington and Pres. John Adams in 1790 and 1798 required mandatory health care and hospital insurance for sailors.[[15]](#footnote-16)

“Cabotage” laws, which regulate the ownership of vessels engaged in a nation’s commerce, also date back to the early days of our Republic. Congress has passed a number of laws to promote US-owned, US-flagged vessels operating in this country’s commercial transportation.

“In 1789, Congress imposed added duties on goods transported by foreign vessels. The Navigation Acts of 1817 barred foreign vessels from domestic commerce. In 1886, Congress extended cabotage laws to passenger vessels, and in 1905 Congress retained U.S. build requirements for domestic shipping. The Merchant Marine Act of 1920 was enacted with the aim of maintaining a merchant marine of the best equipped and most suitable types of vessels owned and crewed by U.S. citizens, sufficient to carry the greater portion of U.S. commerce and serve as a naval or military auxiliary at time of war.”[[16]](#footnote-17)

The federal government has also taken an active interest in promoting water transportation infrastructure in the interior of the United States. Federal involvement in river transportation infrastructure, usually involving the US Army Corps of Engineers,[[17]](#footnote-18) dates back to the 1820s.

“In 1824, however, the Supreme Court ruled in Gibbons v. Ogden that federal authority covered interstate commerce including riverine navigation. Shortly thereafter, Congress passed two important laws that, together, marked the beginning of the Corps' continuous involvement in civil works. The General Survey Act authorized the president to have surveys made of routes for roads and canals "of national importance, in a commercial or military point of view, or necessary for the transportation of public mail." The president assigned responsibility for the surveys to the Corps of Engineers. The second act, passed a month later, appropriated $75,000 to improve navigation on the Ohio and Mississippi rivers by removing sandbars, snags, and other obstacles. Subsequently, the act was amended to include other rivers such as the Missouri.”[[18]](#footnote-19)

The Corps’ work on the Mississippi and Ohio Rivers before the Civil War led to lower transportation costs and rapid increases in boat traffic and commerce using those rivers. After the War, the Corps continued to dredge rivers and maintain locks and dams that promote commercial use of water transportation infrastructure in the U.S.

Railroads

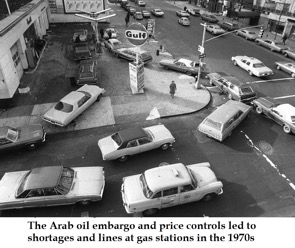
We noted above that the trans-continental railway link was completed with the help of federal subsidies. But that wasn’t the last time the federal government came to the aid of the railroads. Though railroads revolutionized travel and cargo movement in the 19th century, by the 1920s they were under heavy competitive pressure from cars and trucks.

By the 1960s, many of the major cargo and passenger train systems had gone bankrupt or merged out of existence. The federal government stepped in to reorganize the cargo rail system into “Conrail,” which became profitable again in the 1980s. Passenger rail service was consolidated into federally-owned Amtrak in 1971, after cutting more than half of the total network from 112,000 miles in existence in 1957.[[19]](#footnote-20)

Intersection of Transportation and Energy Policy

Since most modern forms of transportation are propelled by some form of combustible fuel, many transportation policies might also be energy policies and vice versa. The federal government has historically initiated a number of policies that change transportation with the goal of reducing fuel consumption. You can debate the topicality of a transportation regulation whose goal is to save energy, but good arguments can be made for their legitimacy this year and you should be familiar with the concepts.

The event that brought transportation into direct collision with energy policy was the Arab oil embargo of 1973-74. Pres. Richard Nixon had earlier imposed price controls on petroleum in an effort to combat rising inflation. When the Arab oil producing nations boycotted oil sales to the United States starting in the fall of 1973 (in protest over US support for Israel in the Yom Kippur War), new supplies could not be found due to the price controls,[[20]](#footnote-21) and shortages quickly broke out.

In the generation since, numerous federal policies have attempted to reduce the use of petroleum fuel by US vehicles. In 1975, Congress enacted CAFÉ (Corporate Average Fuel Economy) standards, mandating by fiat that the average fuel economy of all cars sold in the U.S. must meet rising standards over the years, or else non-compliant car makers must pay penalties. The federal government has also historically provided subsidies intended to promote research into alternate fueled (e.g. hydrogen) and high-mileage (e.g. hybrid) cars.

The federal government in 2005 also established the Renewable Fuel Standard (RFS), which requires blending of large amounts of ethanol into the US gasoline supply. Ostensibly part of an “energy policy,” Congress also intended it to benefit agriculture, since ethanol is produced mostly from Midwestern corn. Since it is used to fuel cars and trucks, perhaps it could arguably be a transportation policy too.

Intersection of Transportation and Environmental Policy

Burning fossil fuels for transportation is one of the biggest environmental concerns in current policy discussions. Many believe that reducing the number of cars and/or their per-mile consumption of gasoline will have beneficial impacts on the environment. Cars impact the environment both from their demand for fuel, which increases oil drilling (including the environmentally controversial fracking), as well as from their tailpipe emissions.

“Auto emissions can cause headaches, contribute to lung cancer, emphysema, and various other respiratory and cardiovascular problems, and have been linked to low birth weight in infants. They also modify weather conditions, damage vegetation, and eat away at rubber, textiles, dyes, and other materials. The use of tetraethyl lead as a gasoline additive in 1923 introduced yet another toxic substance to automobile emissions that threatened human health. [[21]](#footnote-22)

In the late 1960s, the federal government began regulating automobile emissions and setting tougher standards for auto makers. In the mid-1970s it mandated catalytic converters and began phasing out leaded gasoline to further reduce dangerous automobile emissions. The Clean Air Act Amendments of 1990 set even higher emissions standards starting in car model year 1996. Despite these improvements, one recent study finds that air pollution from transportation emissions still causes 53,000 deaths in this country per year.[[22]](#footnote-23)

Worksheet: History of US Transportation Policy

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Answer the following in the spaces provided.

1. Where in the US Constitution does it mention the need for the US government to be involved in transportation? Before modern technology, what were the three modes of transportation for most of the world?

2. What did the The Pacific Railway Act offer the developing US in 1862?

3. What Nazi social implementation proved beneficial to transportation? What US policy was passed in its stead?

4. How many people die every year from automobile accidents? What has helped reduce this number?

5. As airline traffic became a bigger and bigger problem, how did Congress respond?

6. What actions were taken by the FAA to prevent hijackings in the 1960s?

7. What US mass transit bill was passed that spelled the end of the private transit system? What did the act promise to end the private industry?

8. What Supreme Court ruling gave the federal government authority in riverine navigation? How did Congress react?

9. Transportation policies whose goals include saving energy, are they topical?

10. What do many people believe reducing cars and/or their per-mile consumption will do for the environment?

Answers

1. The US Constitution mentions a federal role in building “post roads” along with its responsibility for operating a post office in Article 1 Section 8 Clause 7. Without modern technology, there were only three modes of transportation when our nation was formed: walking, animal power, and boats.

2. The Pacific Railway Act, which became law on July 1, 1862, offered government incentives to assist “men of talent, men of character, men who are willing to invest” in developing the nation’s first transcontinental rail line.

3. The Nazi regime in Germany managed to implement one social reform in the 1930s that proved highly beneficial: a high-speed, limited access highway system (the “autobahn”). The Federal-Aid Highway Act of 1956 was passed in its stead.

4. 40,000 people die yearly from automobile accidents. Improved safety practices (some government-mandated, others developed by industry) along with improved driver awareness have made driving safer in the US.

5. As airline traffic became a bigger and bigger problem, Congress passed the Federal Aviation Act of 1958, in which they nationalized the air traffic control system and created the Federal Aviation Agency (later renamed the Federal Aviation Administration).

6. In 1969, the FAA started taking new efforts to prevent hijackings, and by the early 1970s airports began using metal detectors and x-ray machines to screen passengers and baggage. Mandatory physical screening of all passengers was implemented in January, 1973.

7. The beginning of the end for private transit came in 1964 with the Urban Mass Transit Act. The act promised federal capital grants to public agencies that took over private transit companies. Within a decade, the private transit industry was virtually wiped out, replaced almost completely by tax-subsidized public agencies.

8. In 1824 the Supreme Court ruled in Gibbons v. Ogden that federal authority covered interstate commerce including riverine navigation. Shortly thereafter, Congress passed two important laws that, together, marked the beginning of the Corps' continuous involvement in civil works.

9. You can debate the topicality of a transportation regulation whose goal is to save energy, but good arguments can be made for their legitimacy this year and you should be familiar with the concepts.

10. Many believe that reducing the number of cars and/or their per-mile consumption of gasoline will have beneficial impacts on the environment. Cars impact the environment both from their demand for fuel, which increases oil drilling (including the environmentally controversial fracking), as well as from their tailpipe emissions.

1. <http://amhistory.si.edu/onthemove/themes/story_47_1.html> [↑](#footnote-ref-2)
2. https://www.senate.gov/artandhistory/history/common/generic/PacificRailwayActof1862.htm [↑](#footnote-ref-3)
3. Report of the 1900 US Census, quoted at http://www.roadswerenotbuiltforcars.com/few-articles-ever-used-by-man-have-created-so-great-a-revolution-in-social-conditions-as-the-bicycle/ [↑](#footnote-ref-4)
4. <http://amhistory.si.edu/onthemove/themes/story_47_1.html> [↑](#footnote-ref-5)
5. <https://www.archives.gov/publications/prologue/2006/summer/interstates.html> [↑](#footnote-ref-6)
6. National Safety Council 2017 reporting estimated statistics for U.S. motor vehicle deaths in 2016 <http://www.prnewswire.com/news-releases/motor-vehicle-deaths-in-2016-estimated-to-be-highest-in-nine-years-sharpest-two-year-climb-in-53-years-300407827.html> [↑](#footnote-ref-7)
7. For example, over 54,000 Americans died in car crashes in 1972, when the population of the country and number of cars on the road were substantially lower than now. [↑](#footnote-ref-8)
8. <http://www.history.com/this-day-in-history/federal-legislation-makes-airbags-mandatory> [↑](#footnote-ref-9)
9. The first official passenger on a regularly scheduled route was Ben F. Redman, who flew from Salt Lake City to Los Angeles. His ticket cost $90. <http://www.birthofaviation.org/first-commercial-airline-passenger/> [↑](#footnote-ref-10)
10. <https://airandspace.si.edu/exhibitions/america-by-air/online/heyday/heyday05.cfm> [↑](#footnote-ref-11)
11. <http://www.encyclopedia.com/social-sciences-and-law/political-science-and-government/us-government/federal-aviation> [↑](#footnote-ref-12)
12. Brendan Koerner 2013 WIRED <https://www.wired.com/2013/06/skyjacking-gallery/>. Ordinary travel to Cuba was illegal due to US economic sanctions imposed during the Kennedy Administration. But even the successful hijackers were disappointed, since the Cuban government normally imprisoned them upon arrival. Other hijackers were simply following the oldest motive in the world: money. Various schemes were used to trade passengers for cash, most of which failed, but the failures did not deter many from continuing to try. [↑](#footnote-ref-13)
13. Madhu Unnikrishnan, AVIATION WEEK 4 June 2015 http://aviationweek.com/blog/law-changed-airline-industry-beyond-recognition-1978 [↑](#footnote-ref-14)
14. Randal O’Toole 2017 <https://www.downsizinggovernment.org/transportation/urban-transit> [↑](#footnote-ref-15)
15. <http://www.politifact.com/rhode-island/statements/2012/jan/13/einer-elhauge/harvard-law-professor-says-early-congress-mandated/> [↑](#footnote-ref-16)
16. US Dept. of Transportation <https://www.marad.dot.gov/wp-content/uploads/pdf/CabotageLaws.pdf>. The Merchant Marine Act of 1920 includes the law known as the “Jones Act,” which requires ships carrying cargo between two US ports to be US-flagged as well as owned and crewed by US citizens. [↑](#footnote-ref-17)
17. The Corps also built the “National Road” mentioned above in the “Early History” section, the first federally funded road in the U.S., built between 1811-1841. [↑](#footnote-ref-18)
18. US Army Corps of Engineers, “A Brief History” <http://www.usace.army.mil/About/History/Brief-History-of-the-Corps/Improving-Transportation/> [↑](#footnote-ref-19)
19. <http://www.american-rails.com/1970s.html> [↑](#footnote-ref-20)
20. Oil was available on world markets, but not at a price below the federally mandated maximum. Shortages are the inevitable result of government imposed price ceilings that are set below the market price. [↑](#footnote-ref-21)
21. Martin Melosi « Auto Emissions and Air Pollution » <http://www.autolife.umd.umich.edu/Environment/E_Overview/E_Overview4.htm> [↑](#footnote-ref-22)
22. M.I.T. 2013 <https://news.mit.edu/2013/study-air-pollution-causes-200000-early-deaths-each-year-in-the-us-0829> [↑](#footnote-ref-23)