

Engineer's Recommendation Intersection of Gray Road & Range Road Cumberland, Maine

Date: August 16, 2023
Subject: Intersection Evaluation and Recommendations
Gray Road & Range Road
To: Bill Shane, P.E., Cumberland Town Manager
From: Randy Dunton, PE, PTOE – Gorrill Palmer

Introduction

The unsignalized intersection of Gray Road & Range Road has a history of increasing crashes over the last five years with a significant increase in the % injury. Currently, Range Road is 35 mph and is stop controlled with Gray Road being 50 mph and free flow conditions. MaineDOT has completed a very thorough review of the intersection including the potential impacts of converting the intersection from a two-way stopped controlled intersection to an all-way stop controlled intersection. This conversion includes; stop bars, additional signs (some with flags and some with LED lighting), and pavement markings.

Recommendation

Based on a review of the information provided by MaineDOT (see attached “Cumberland – Intersection of Gray Road & Range Road, Background Safety / Mobility Analysis”, dated July 6, 2023), and discussions with their safety office as well as the Region Traffic Engineer, I concur with the MaineDOT’s recommendation that the intersection be converted from a two-way stop controlled intersection to an all-way stop controlled intersection as identified in the attached power point.

Attachments

Attachment A – MaineDOT power point presentation: “Cumberland – Intersection of Gray Road & Range Road, Background Safety / Mobility Analysis”, dated July 6, 2023

u:\3656.19_range @ route 100_cumberland\engineers recommendation 8-16-23.docx



Attachment A

MaineDOT Power Point

Cumberland – Intersection of Gray Road & Range Road

Background Safety/Mobility Analysis

July 6, 2023

A large yellow triangle is positioned in the bottom right corner of the slide, pointing towards the top right.

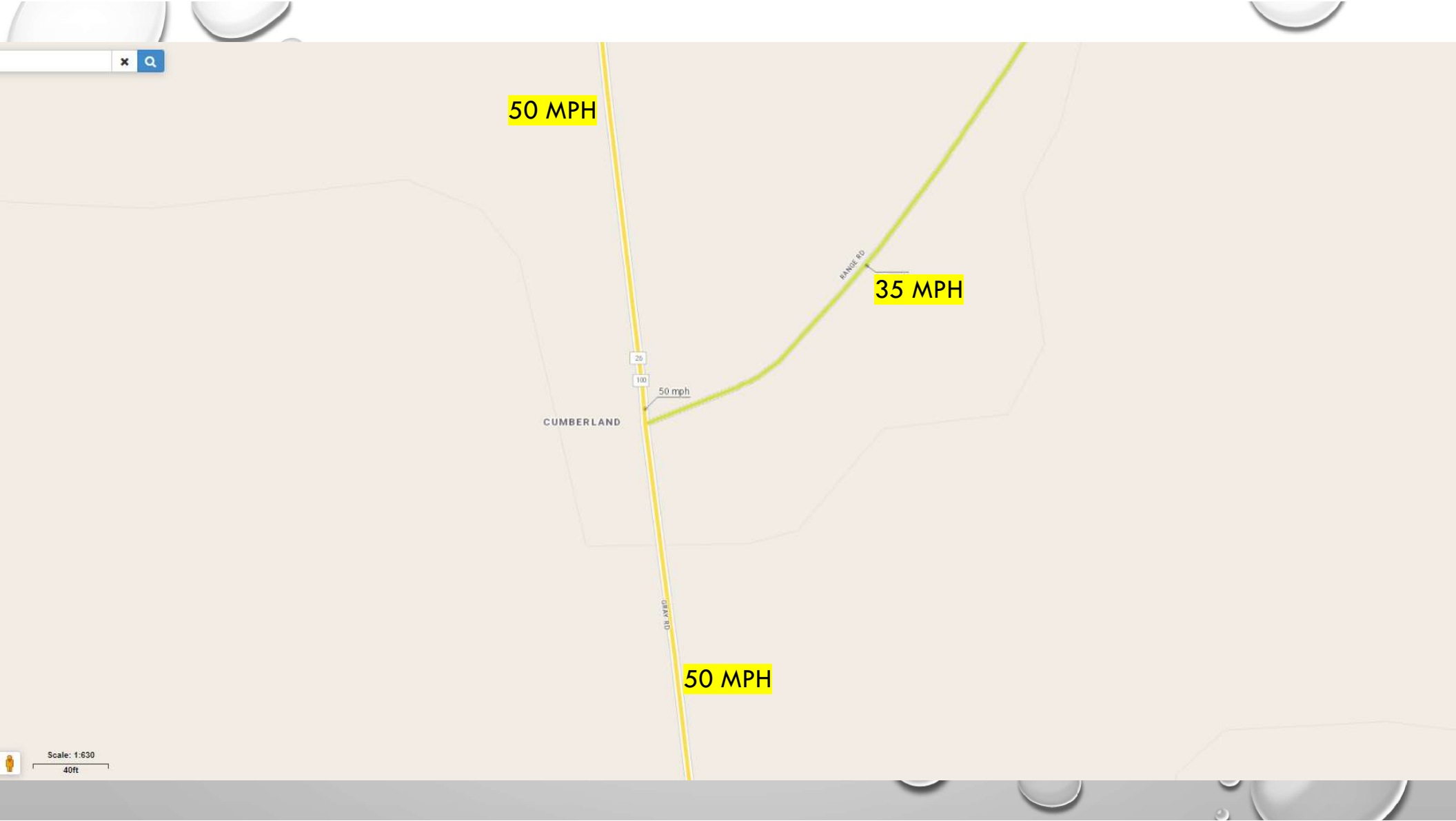
SAFETY PROBLEMS

- TYPES OF CRASHES
- SEVERITY OF CRASHES
- SIGHT DISTANCE
- ? (HAVEN'T BEEN ON FIELD VISIT YET 6-26-23)









50 MPH

35 MPH

50 MPH

CUMBERLAND

RANGE RD

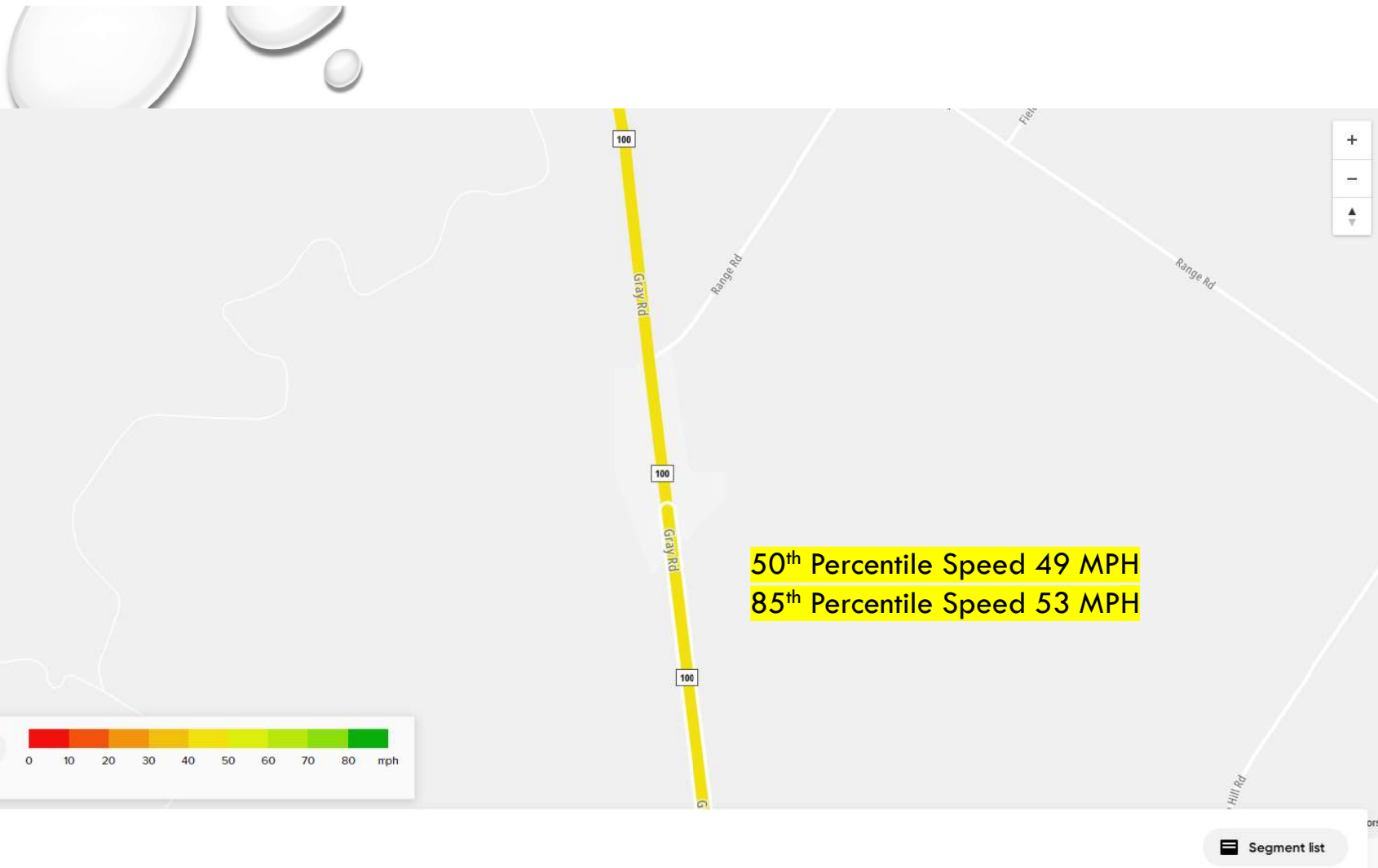
GRAN RD

20
100

50 mph



Scale: 1:630
40ft



Gray Rd

Road class: 3

1103.67 ft
635.04 ft 1738.71 ft

2022 0:00-7:00, 9:00-15:00, 17:00-24:00

Sample size 137424

Time [s]

Median 15.45
Average 16.09

Speed [mph]

Average 48.05
Harmonic average 46.78
15th 43
50th 49
85th 53

Feedback

<https://ts.tomtom.com/reports/share/details/CTT/3346743?t=1b01048d-233c-4bf5-8ef8-92ca11279a4c>

Design Speed	35	40	45	50	55
Sight Distance	390	445	500	555	610



Sight Distance @ Southern Entrance Looking Left ~ 320 Feet

AADT –2023 Annual Average Daily Traffic



AM Peak Hour 7:15 to 8:15

1 Rte 26 & Store/Range Rd

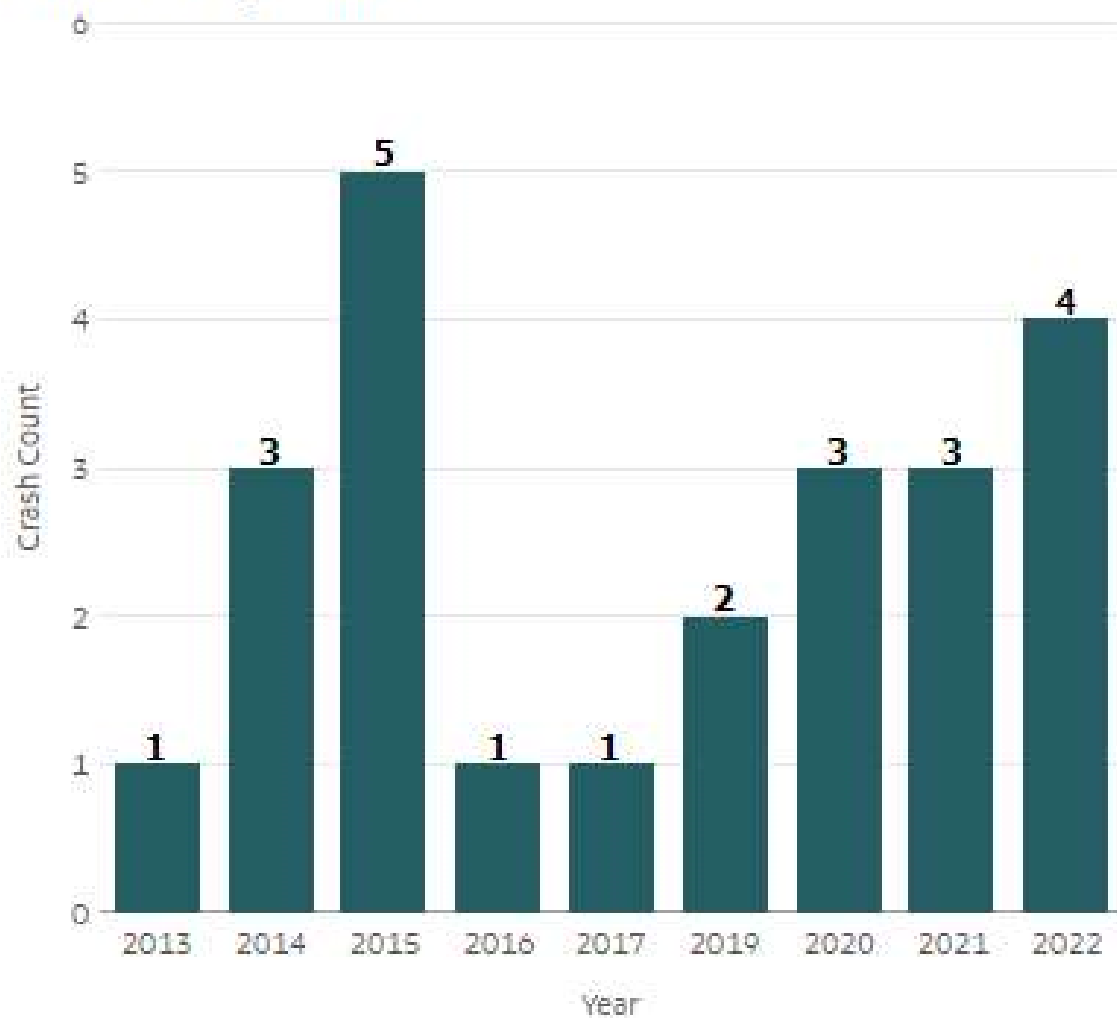


PM Peak Hour 4:30 to 5:30

No Intersection Selected

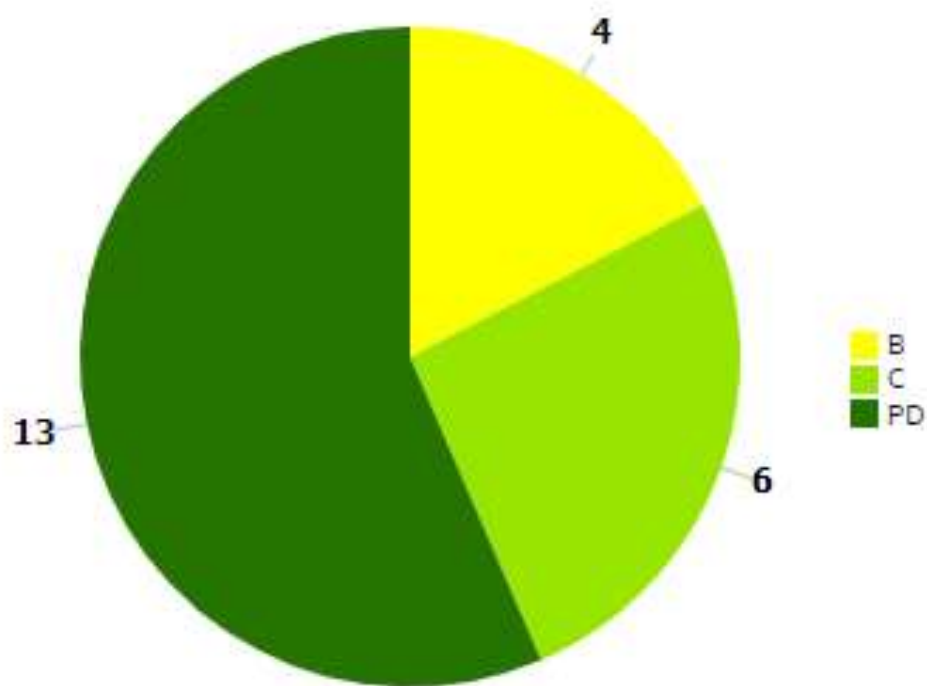


Crashes By Year



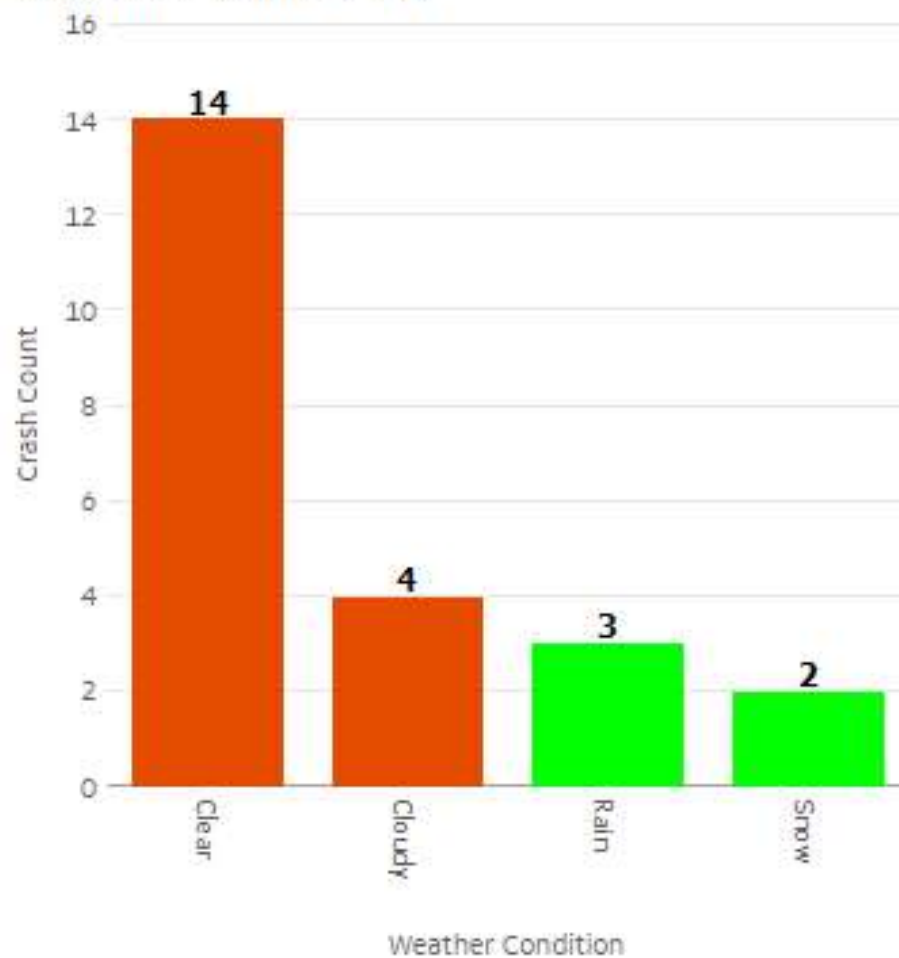
Year	Injury Crash Count	% Injury	B	C	PD	Number of Crashes
2013	0	0.00%			1	1
2014	1	33.33%		1	2	3
2015	2	40.00%		2	3	5
2016	0	0.00%			1	1
2017	0	0.00%			1	1
2019	0	0.00%			2	2
2020	2	66.67%	1	1	1	3
2021	2	66.67%	1	1	1	3
2022	3	75.00%	2	1	1	4
Crash Count			4	6	13	23

Injury Level

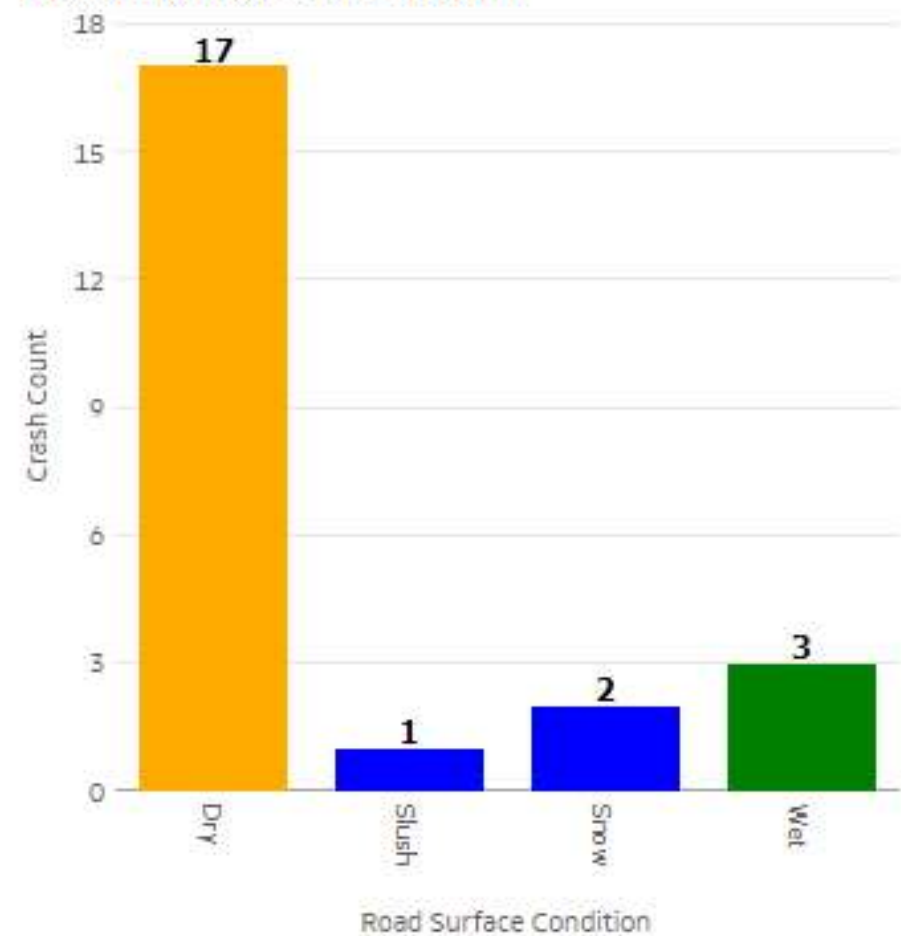


Route - MP	Section U/R Length	Total Crashes	K	Injury Crashes				Percent Injury
				A	B	C	PD	
Grand Totals:	0.03	23	0	0	4	6	13	43.5

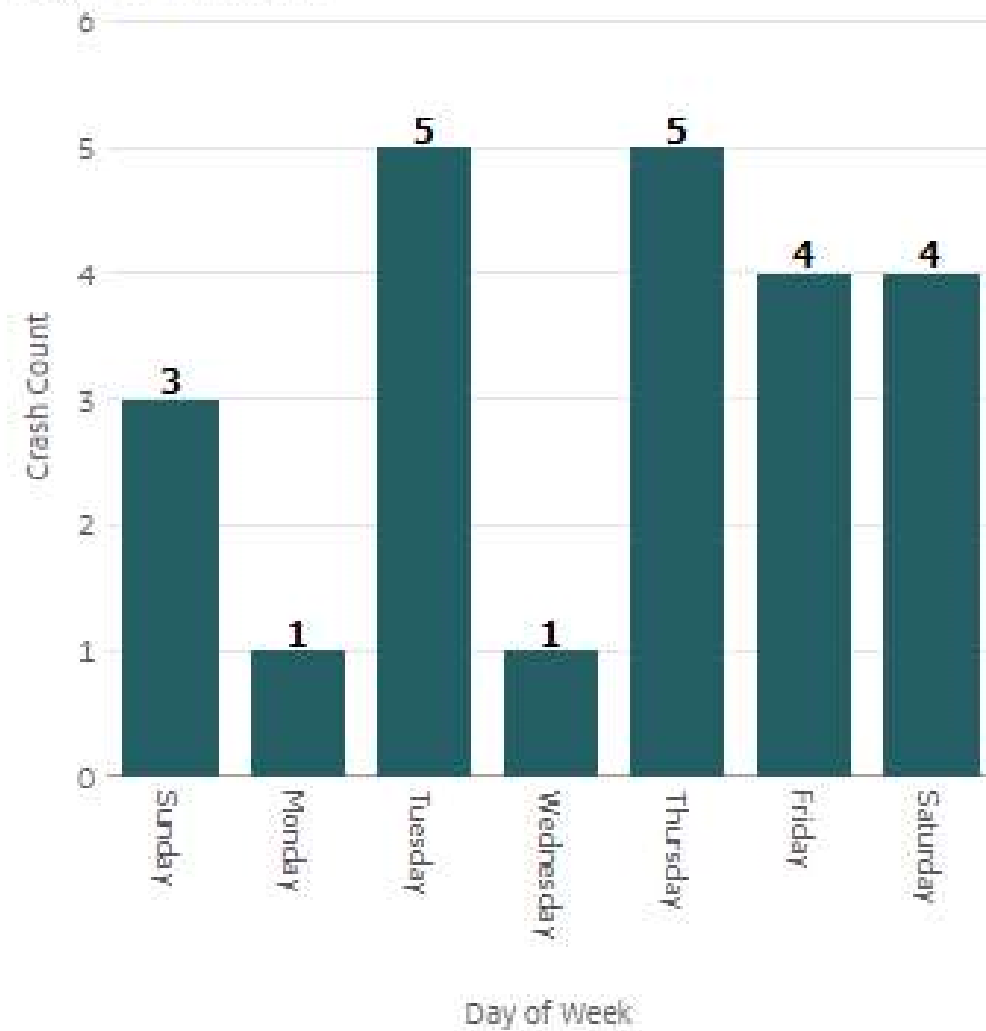
Weather Condition



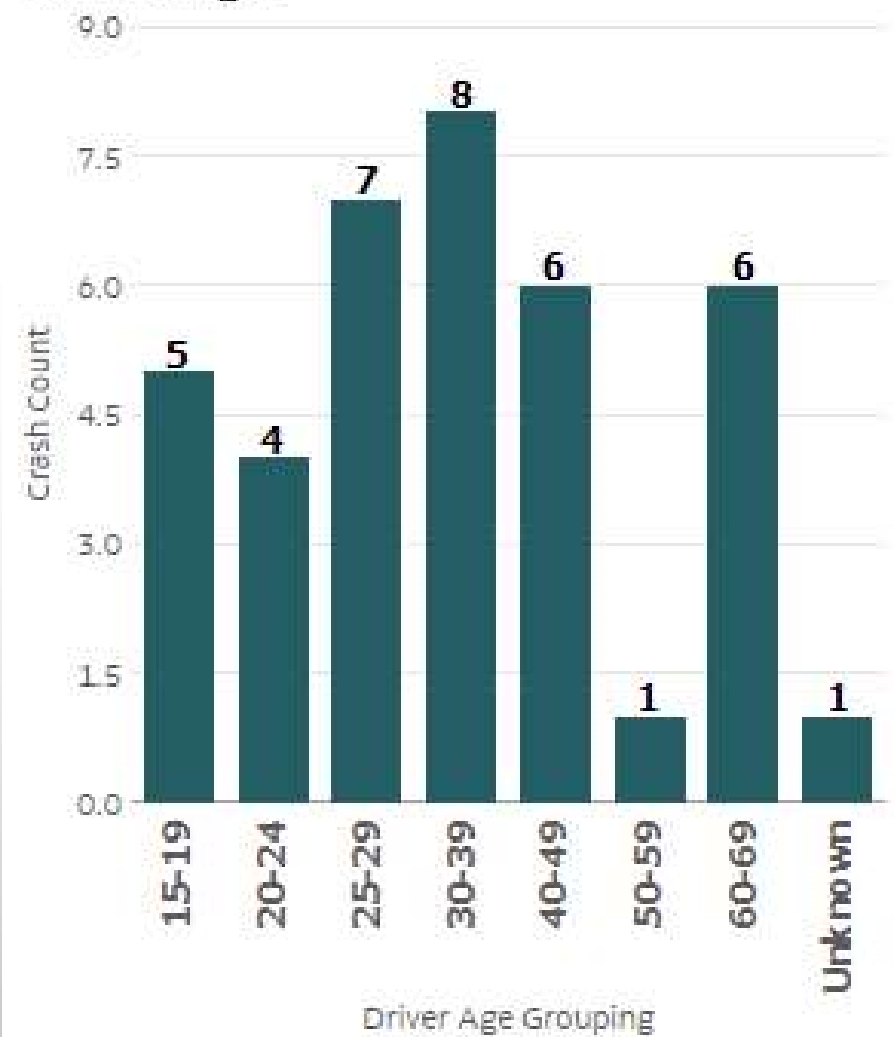
Road Surface Condition



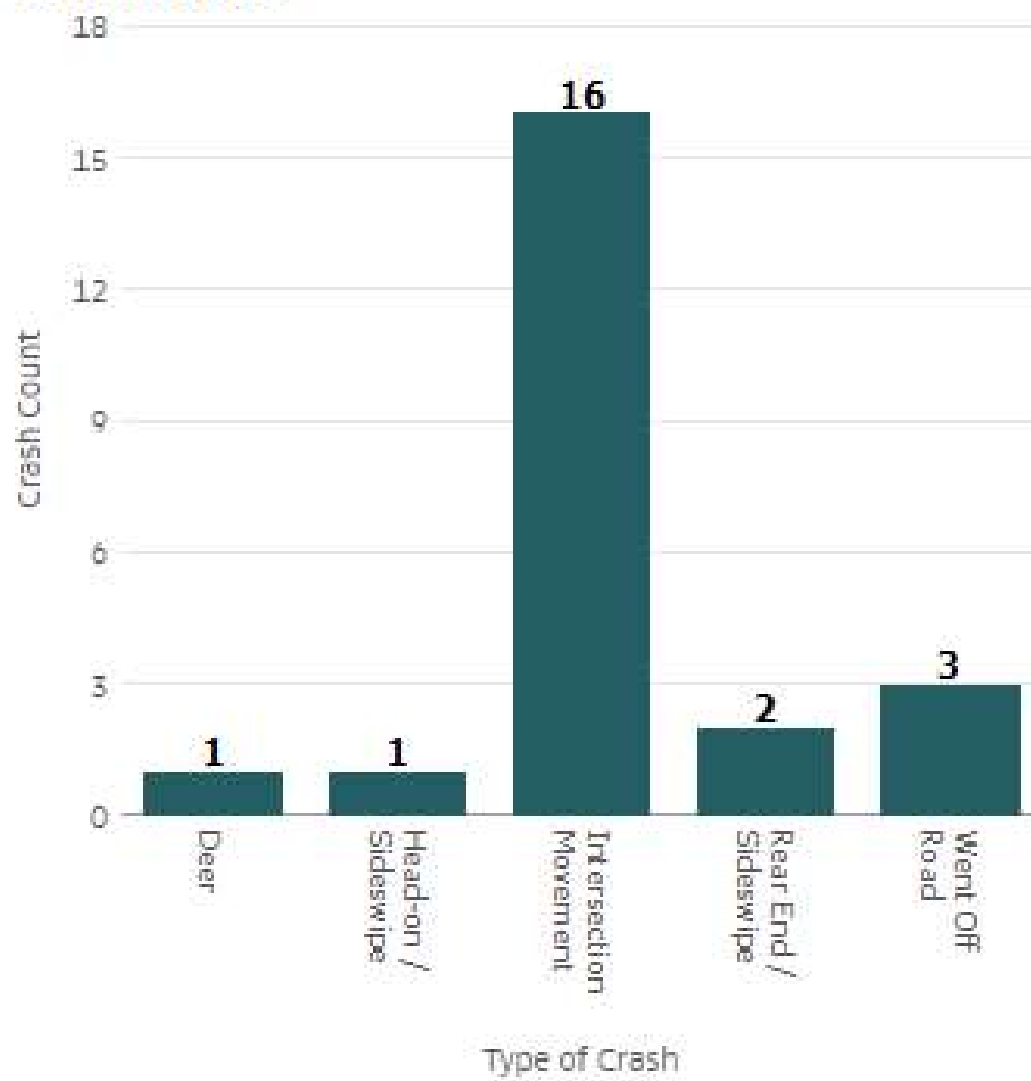
Day of Week



Driver Age



Crash Type



HIGH SPEED ANGLE CRASH SEVERITY

"Angle" Crash Severity By Intersection Speed Limit

	Injury %	K+A %	K+A+B %
25	25.96%	0.98%	6.30%
30	43.5%	0.0%	17.4%
35	31.65%	2.01%	9.53%
40	34.25%	2.53%	11.96%
45	40.68%	4.38%	15.82%
50	45.27%	5.55%	18.28%
55	49.42%	6.26%	22.74%

THE INTERSECTION IS NOT A HIGH CRASH LOCATION (HCL) OR HAS HISTORY OF BEING HCL.

Route 26 & Range Road @ 50 mph

Range Rd

Cumberland

Node: I7084 area

Study Period: 2018-2022

of Crashes: 12 / CRF: 4.46

Prepared by Office of Safety & Mobility (MP 5/30/23)



I7084

Stop

Gray Rd

55656 6-20-19 5:09P W/R Fail to Yield

31018 12-6-20 7:28A D/CL Inattention

27939 9-30-22 10:45A D/C Fail to Yield (C)

11348 4-12-22 10:20A W/R Fail to Yield

25362 9-1-21 1:22P D/C Improper Turn

28927 11-21-20 9:30A D/CL Fail to Yield (C)

27529 11-8-20 3:10P D/C Fail to Yield (B)
M/C (C)

light pole

7402 3-23-21 10:48A D/C Fail to Keep in Lane (C)

Gray Rd

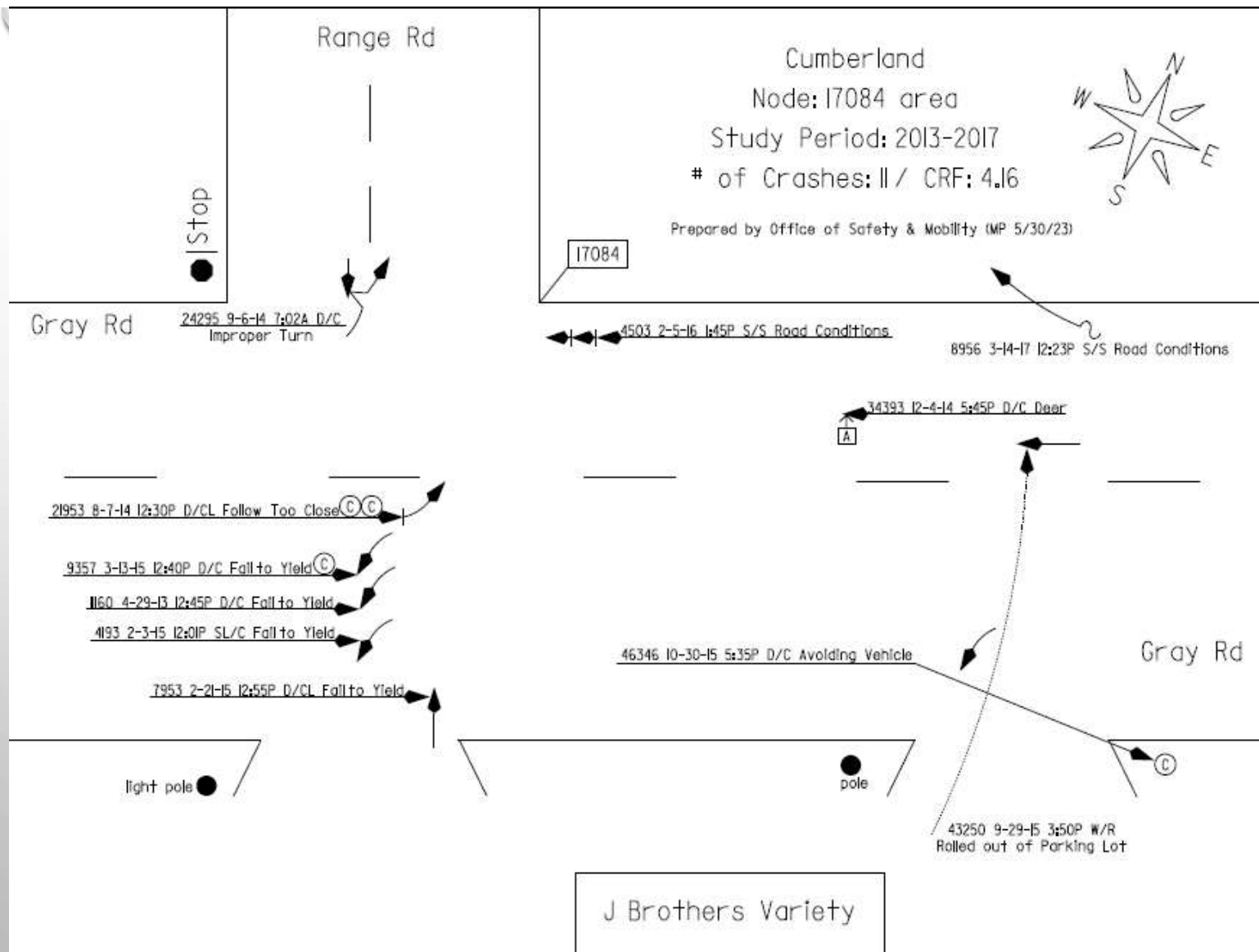
14036 6-3-21 9:39A D/C Fail to Yield (B)

27957 10-2-22 3:45P D/C Fail to Yield (B)

18592 6-30-22 1:34P D/C Improper Turn

69107 10-19-19 1:56P D/C Fail to Yield

J Brothers Variety



HCM AM Existing Conditions Delays (sec/veh)

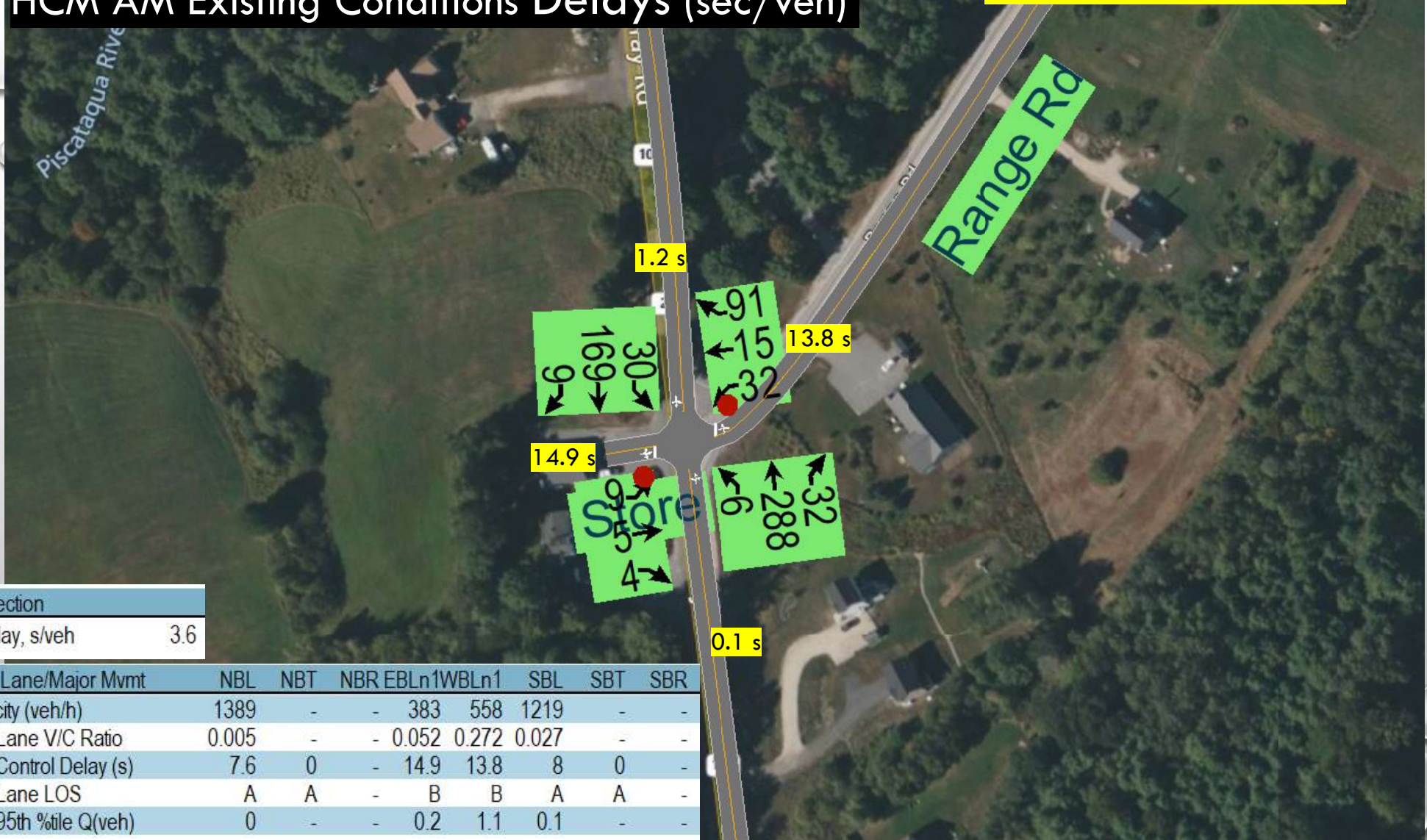
2023 AM DHV Hour 7:15-8:15



Intersection								
Int Delay, s/veh		3.3						
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1068	-	-	369	391	1442	-	-
HCM Lane V/C Ratio	0.005	-	-	0.062	0.197	0.072	-	-
HCM Control Delay (s)	8.4	0	-	15.4	16.4	7.7	0	-
HCM Lane LOS	A	A	-	C	C	A	A	-
HCM 95th %tile Q(veh)	0	-	-	0.2	0.7	0.2	-	-

HCM AM Existing Conditions Delays (sec/veh)

PM Peak Hour 4:30 to 5:30



Intersection	
Int Delay, s/veh	3.6

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1389	-	-	383	558	1219	-	-
HCM Lane V/C Ratio	0.005	-	-	0.052	0.272	0.027	-	-
HCM Control Delay (s)	7.6	0	-	14.9	13.8	8	0	-
HCM Lane LOS	A	A	-	B	B	A	A	-
HCM 95th %tile Q(veh)	0	-	-	0.2	1.1	0.1	-	-

Summary Cumberland Rte 26 & Range Road					
May 31, 2023 TM Counts Adjusted for Average Day					
Group Factor:	70% Option?	Right Turn Discount?	Lanes	Right Turn Treatment	
0.89	Yes	yes	1 Major/Minor 1	Discounted	All Include
Warrant 1 Eight-Hour Vehicle Volume					
Warrant 1A				Not Met	N/A
Warrant 1B				Not Met	N/A
Warrant 1C				Not Met	N/A
Warrant 2 Four-Hour Vehicle Volume				Not Met	N/A
Warrant 3 Peak Hour					
Warrant 3 A (delay) All three conditions need to be met.				Not Met	
1. Delay on minor street		No			
2. Entering volume on minor street		No			
3. Entering volume for intersection		No			
Warrant 3 B (volume - a.m. or p.m.)				Not Met	N/A
Warrant 4 Pedestrian Volume					
Warrant 4A (four-hour)				Not Met	
Warrant 4B (peak-hour)				Not Met	
Warrant 5 School Crossing				N/A	
Warrant 6 Coordinated Signal System				Not Met	
Warrant 7 Crash Experience				Not Met	N/A
Warrant 7 All Three Conditions need to be met					
1. Adequate trials of safety alternatives		no			
2. Five or more crashes in 1 yr correctable by signal		No			
3. 80% of Warrant 1 A or Warrant 1B or Warrant 4		No			
Warrant 8 Roadway Network - N/A				Not Met	
1. 1000 or more entering volume at intersection		No			
2. Warrants 1, 2, or 3 in five years		No			
3. Major route / integral to transportation system		No			
Warrant 9 Intersection near a RR Xing - N/A				N/A	

**NO MUTCD
SIGNAL
WARRANTS
MET**

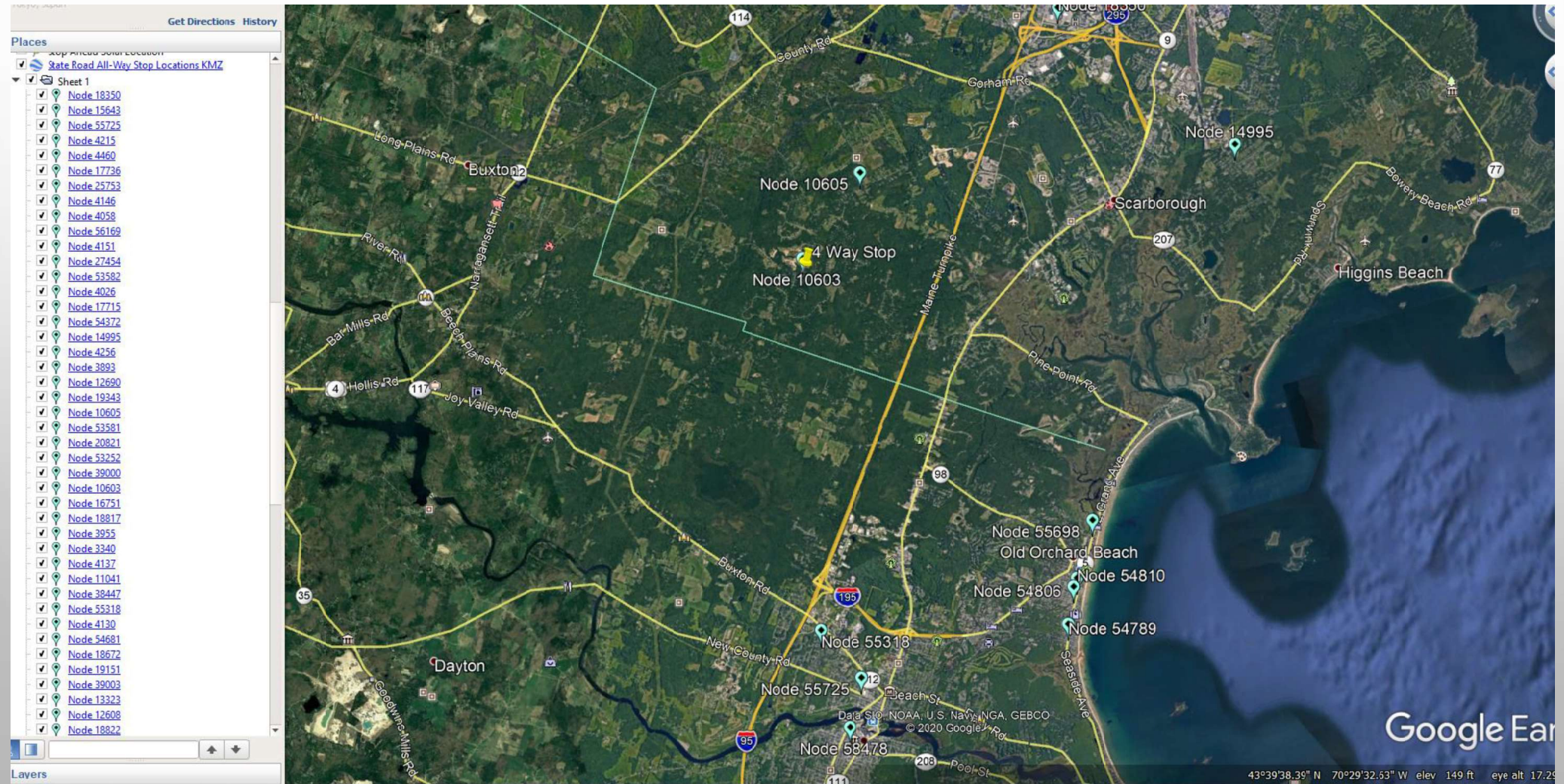
ALTERNATIVES

- **TRAFFIC SIGNAL — DID NOT MEET ANY MUTCD SIGNAL WARRANTS.**
- **ALL WAY STOP — MET WARRANT**
- **IMPROVE INTERSECTION SIGHT DISTANCE**

HOW AWS CAME TO BE CONSIDERED AS AN ALTERNATIVE?

- REVIEWED MAINE EXAMPLES
 - HISTORICAL DATA
 - RECENT EXAMPLES
- NATIONAL STUDIES
 - NORTH CAROLINA MEETING/STUDY

ALL-WAY STOP LOCATIONS



OLDER EXAMPLE OF AWS



NEWER TYPE INSTALLATIONS



HISTORICAL MAINE BEFORE / AFTER

- CRASH REDUCTION = 45%
- INJURY CRASH REDUCTION = 52%
- CRASH COST REDUCTION = 54%

NATIONAL CRASH REDUCTION CONVERT TWO-WAY TO ALL-WAY STOP CONTROL

- CRASH REDUCTION = 82% / 61%
- INJURY CRASH REDUCTION =
87% / 72%

Safety Study Results (2010 Data)

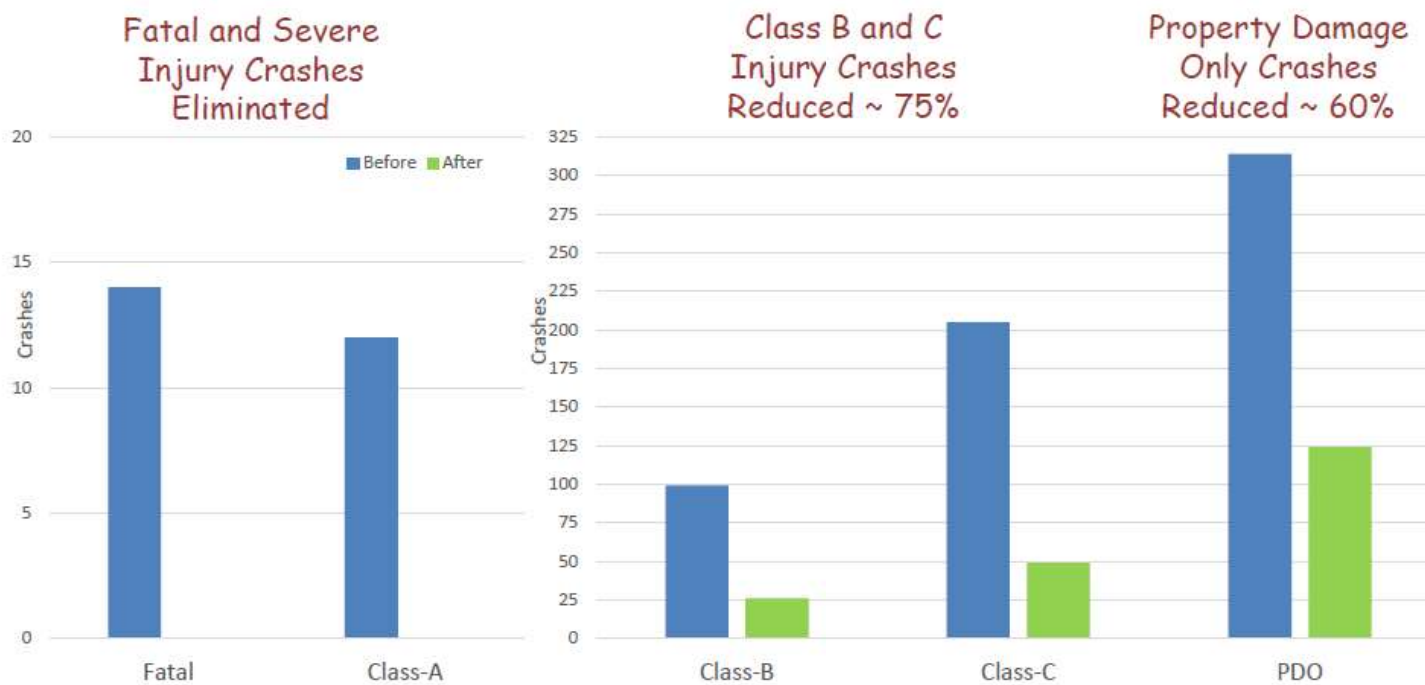
- Safety study of over 50 intersections in NC converted from 2-way stop to AWS.
- The study included a diverse group of four-leg intersections converted to AWS in urban, suburban, and rural areas (included some locations outside of Spot Safety).
- Intersections with a range of volumes and approach speeds were included.
- The study was comprised of locations both with and without overhead and/or sign mounted flashing beacons.
- The overall results indicate a:

68% Reduction in Total Crashes
77% Reduction in Fatal and Injury Crashes
75% Reduction in Frontal Impact Crashes

There appears to be an even greater crash reduction at higher speed (45-55 mph) AWS sites.

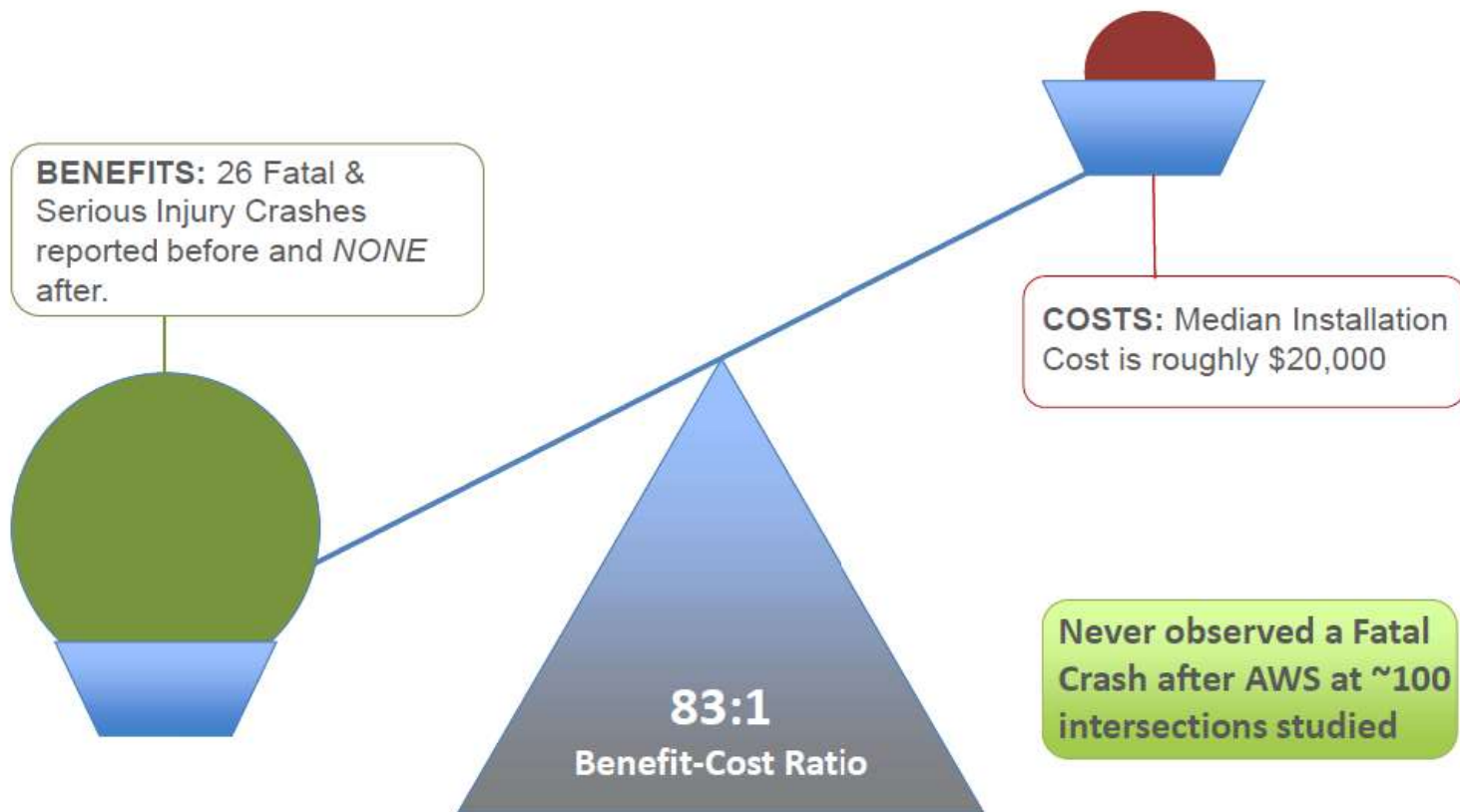
Crash Severity (2020 Data)

36 AWS Spot Safety Projects at 4-leg Intersections with Before & After Crash Data



Cost and Benefits (2020 Data)

36 AWS Spot Safety Projects at 4-leg Intersections with Before & After Crash Data



Casco Conversion – Route 11 / Route 121

CONVERTED OCTOBER 2019

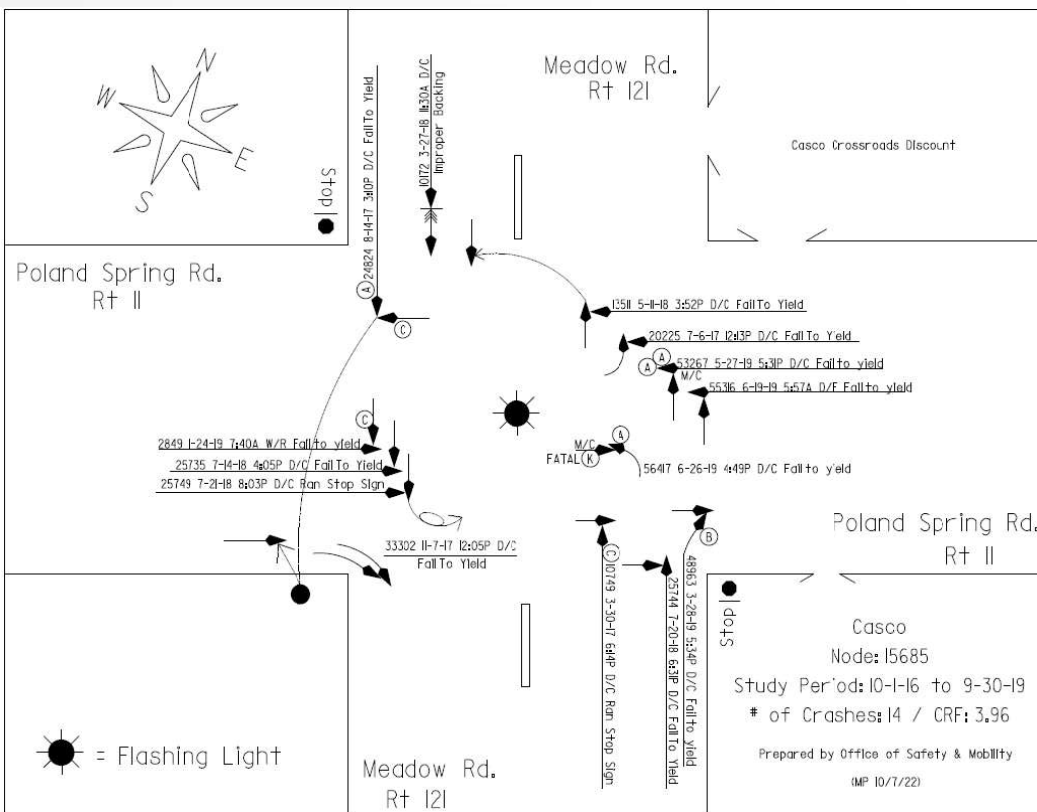


Crashes Per Year		Crash Reduction
Before	After	64.3%
4.67	1.67	
Injury Crashes Per Year		Injury Crash Reduction
Before	After	66.7%
2.00	0.67	
Fatal / Severe Injury Crash Per Year		Fatal / Serious Injury Crash Reduction
Before	After	100.0%
1.00	0.00	
Crash Cost Per Year		Crash Cost Reduction
Before	After	97.8%
\$ 3,918,700	\$ 85,467	
Crash Cost Per Crash		Crashes are on average
Before	After	93.9% Less severe
\$ 839,721.43	\$ 51,280.00	

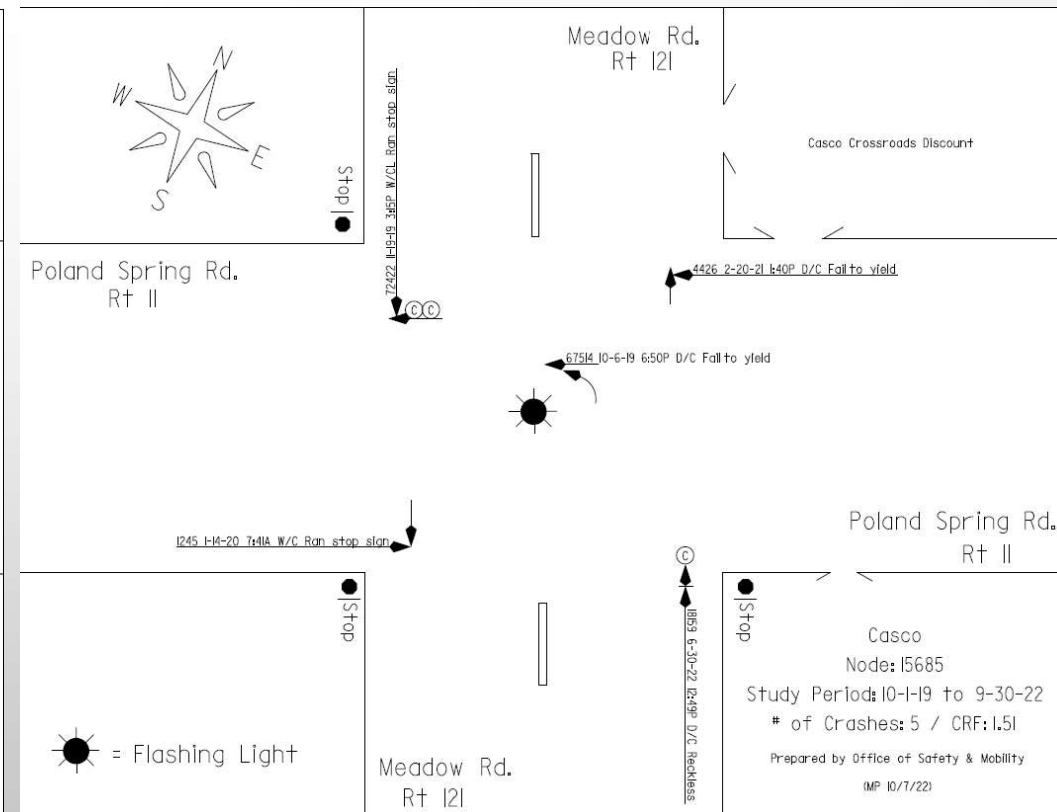
Casco Conversion – Route 11 / Route 121

CONVERTED OCTOBER 2019

CASCO 3-YEARS BEFORE

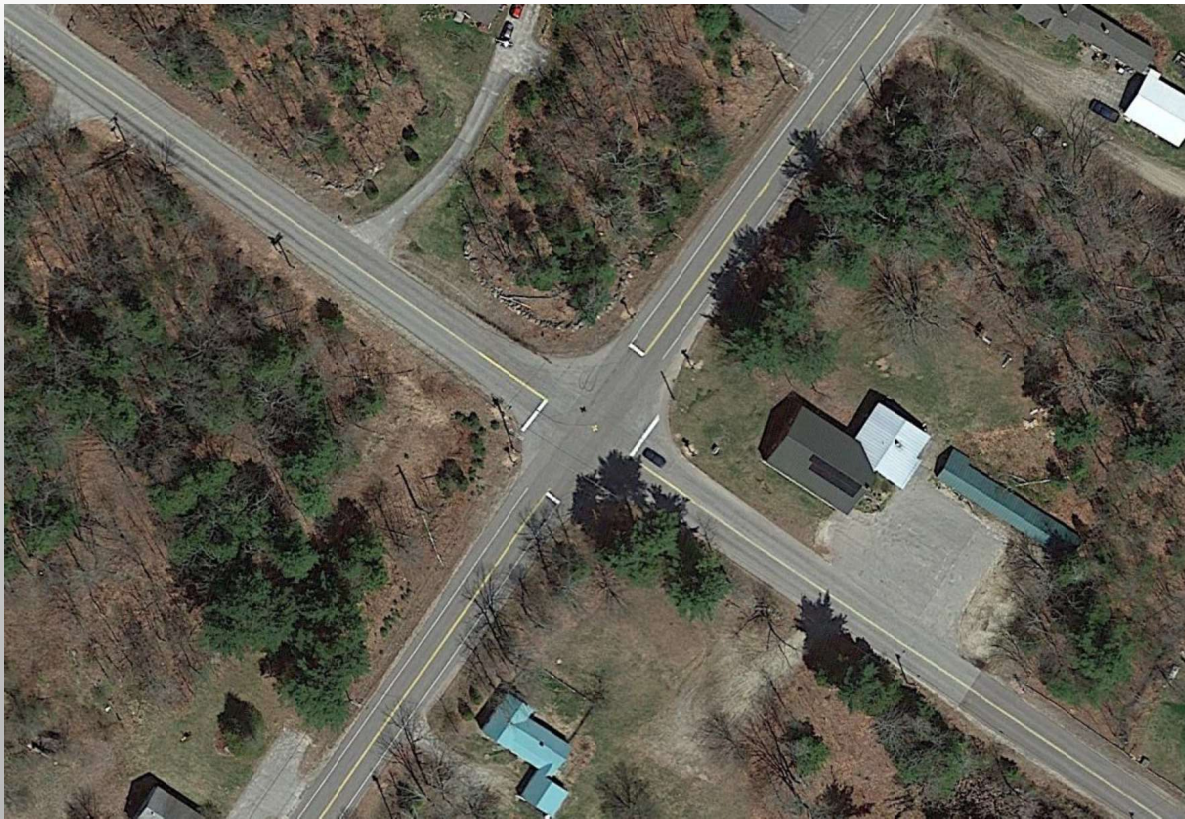


CASCO 3-YEARS AFTER



Durham Conversion – Route 125 / Quaker Meetinghouse Rd

CONVERTED MARCH 2018

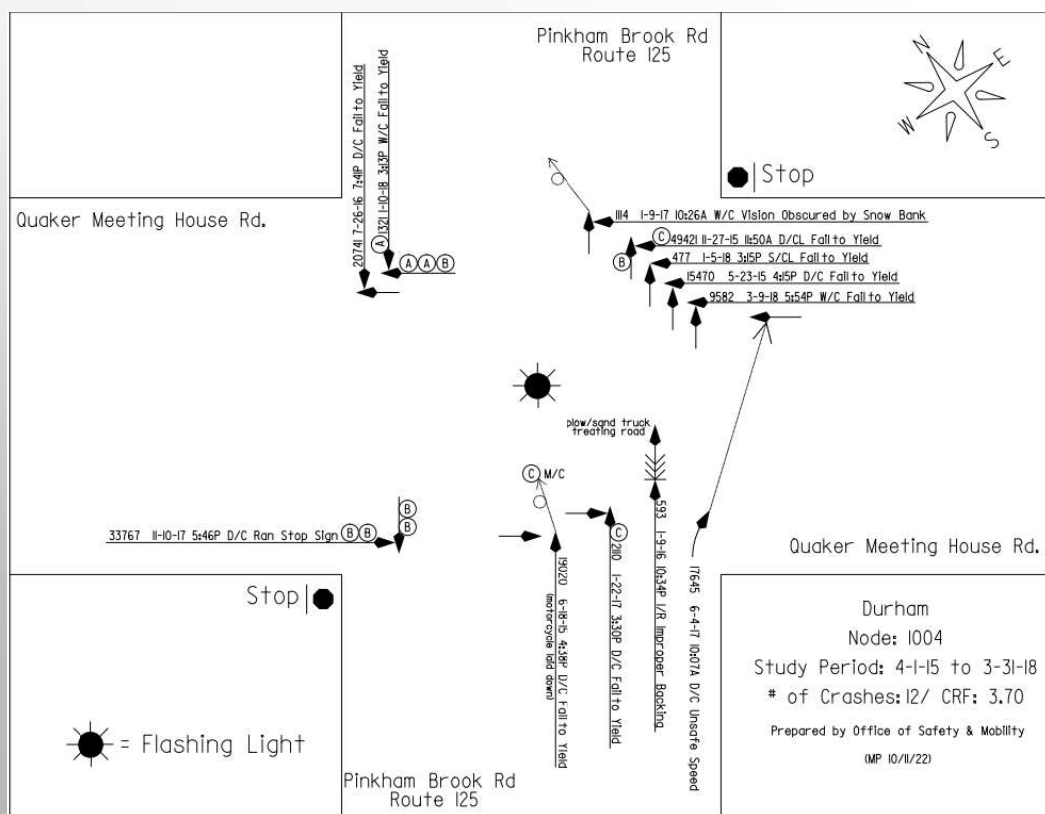


Crashes Per Year		Crash Reduction
Before	After	72.0%
3.30	0.92	
Injury Crashes Per Year		Injury Crash Reduction
Before	After	100.0%
1.90	0.00	
Fatal / Severe Injury Crash Per Year		Fatal / Serious Injury Crash Reduction
Before	After	100.0%
0.30	0.00	
Crash Cost Per Year		Crash Cost Reduction
Before	After	97.6%
\$ 409,320	\$ 9,792	
Crash Cost Per Crash		Crashes are on average
Before	After	91.5% Less severe
\$ 124,036.36	\$ 10,600.00	

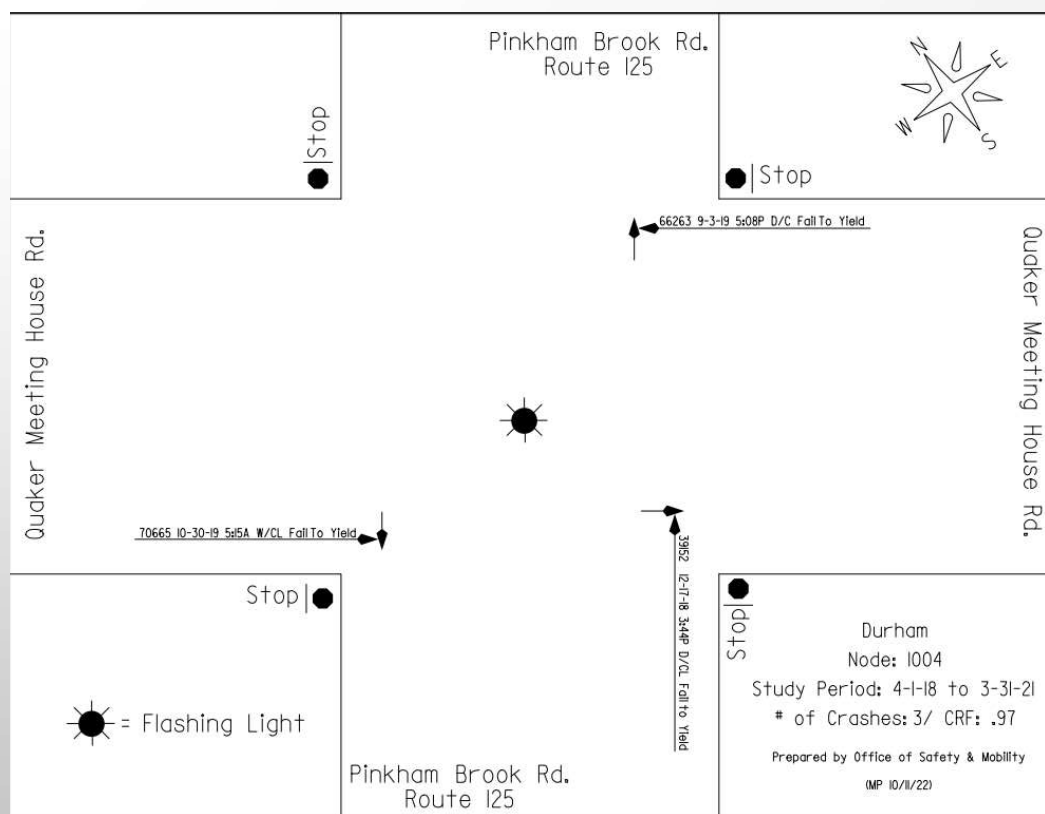
Durham Conversion – Route 125 / Quaker Meetinghouse Rd

CONVERTED MARCH 2018

DURHAM 3-YEARS BEFORE



DURHAM 3-YEARS AFTER



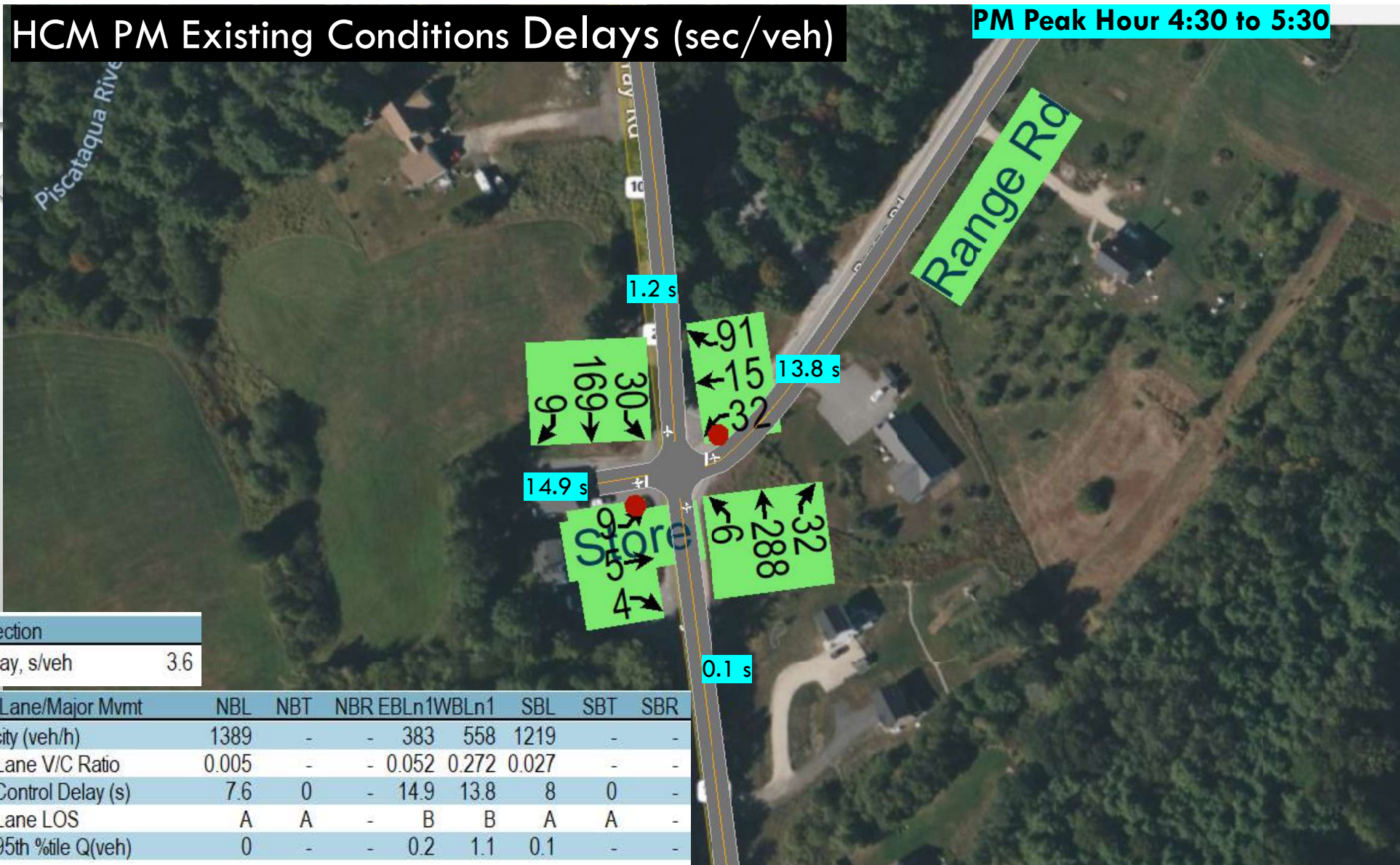
HCM AM Existing Conditions Delays (sec/veh)

2023 AM DHV Hour 7:15-8:15



HCM PM Existing Conditions Delays (sec/veh)

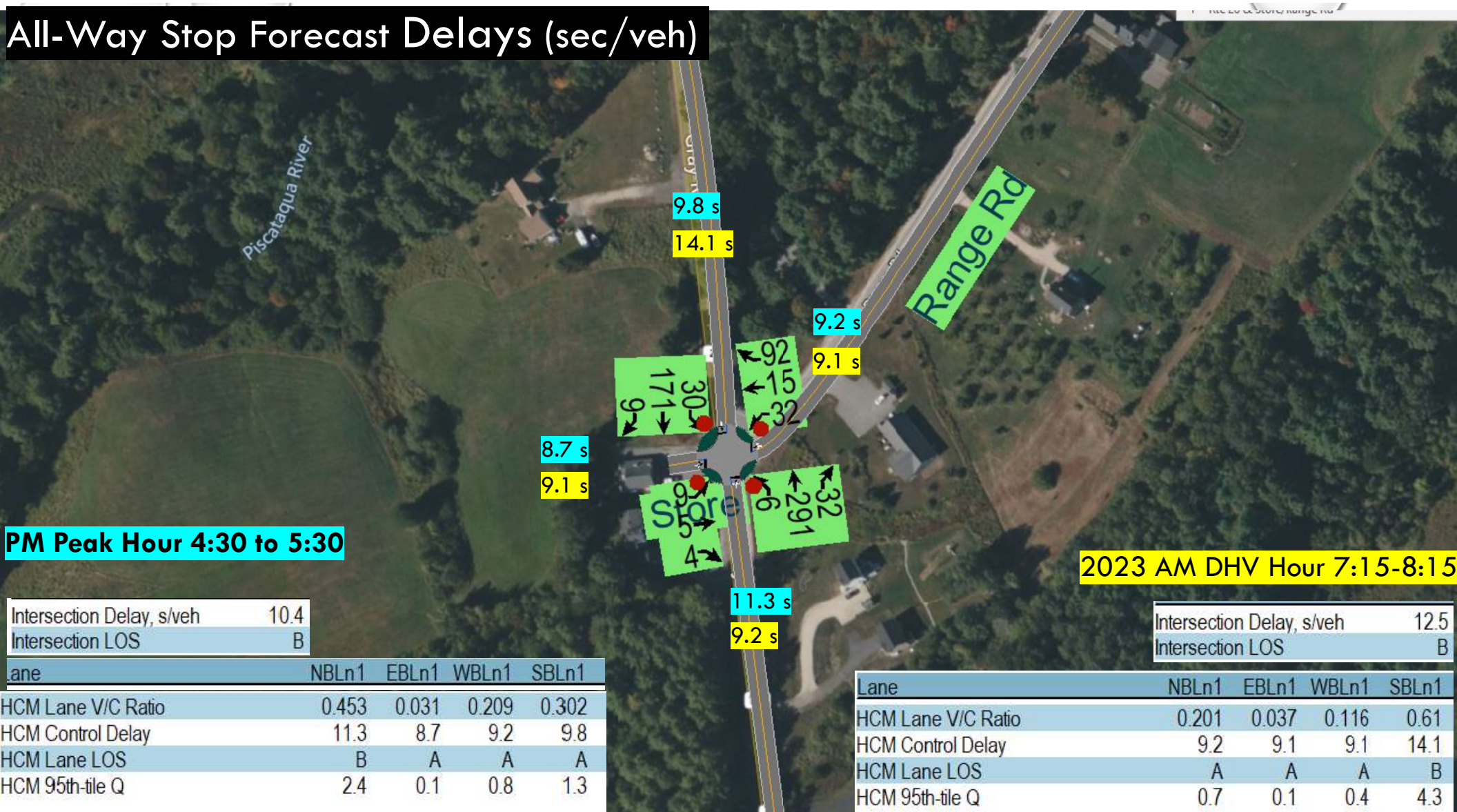
PM Peak Hour 4:30 to 5:30



Intersection	
Int Delay, s/veh	3.6

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1389	-	-	383	558	1219	-	-
HCM Lane V/C Ratio	0.005	-	-	0.052	0.272	0.027	-	-
HCM Control Delay (s)	7.6	0	-	14.9	13.8	8	0	-
HCM Lane LOS	A	A	-	B	B	A	A	-
HCM 95th %tile Q(veh)	0	-	-	0.2	1.1	0.1	-	-

All-Way Stop Forecast Delays (sec/veh)



PM Peak Hour 4:30 to 5:30

Intersection Delay, s/veh	10.4			
Intersection LOS	B			
Lane	NBLn1	EBLn1	WBLn1	SBLn1
HCM Lane V/C Ratio	0.453	0.031	0.209	0.302
HCM Control Delay	11.3	8.7	9.2	9.8
HCM Lane LOS	B	A	A	A
HCM 95th-tile Q	2.4	0.1	0.8	1.3

2023 AM DHV Hour 7:15-8:15

Intersection Delay, s/veh	12.5			
Intersection LOS	B			
Lane	NBLn1	EBLn1	WBLn1	SBLn1
HCM Lane V/C Ratio	0.201	0.037	0.116	0.61
HCM Control Delay	9.2	9.1	9.1	14.1
HCM Lane LOS	A	A	A	B
HCM 95th-tile Q	0.7	0.1	0.4	4.3

Cumberland Route 26 & Range Road B/C Analysis

Benefit-Cost Analysis

Alternative	Analysis Duration	Safety Benefit	Mobility Benefit	Net Benefit	Cost Estimate	Net Benefit-Cost
AWS	10 Years	\$2,892,280	-\$175,450	\$2,716,830	\$20,000	135.84

BENEFITS OF AN ALL-WAY STOP

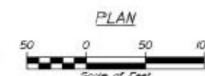
- SIGNIFICANT REDUCTION IN TOTAL CRASHES.
- SIGNIFICANT REDUCTION IN INJURY CRASH SEVERITY.
- ZERO FATAL CRASHES AT AWS SINCE 2003.
- HIGH SAFETY BENEFIT / COST RATIO.
- VEHICLES ENTER THE INTERSECTION AT LOW SPEEDS.
- MINIMAL DELAY WITH EACH CONVERSION.

Concept Plan Gray Rd & Range Rd Cumberland, ME

GENERAL NOTES:
RED REFLECTIVE VERTICAL STRIPS WILL BE PLACED ON EACH STOP SIGN POST FACING TRAFFIC ON
YELLOW INTERACTIVE VERTICAL STRIPS WILL BE PLACED ON EACH STOP AHEAD SIGN POST FACING
TRAFFIC ON
SIGHT LINE CLEARING MAY BE NEEDED SO MOTORISTS CAN ADEQUATELY SEE THE TRAFFIC CONTROL DEVICES.
ALL NEW SIGNS INDICATING THE CHANGE TO STOP TRAFFIC ON GRAY ROAD SHALL BE KEPT COVERED UNTIL NEW
GRAY ROAD FLASHING STOP SIGNS ARE ACTIVATED. STOP SIGNS AND STOP AHEAD SIGNS ON THE BRANCH ROAD
APPROACHES DO NOT NEED TO BE COVERED.
THE ADVANCED WARNING SIGN LOCATIONS SHOWN ON THIS PLAN ARE APPROXIMATE. THE APPROPRIATE
DISTANCES THESE SIGNS ARE PLACED FROM THE INTERSECTION SHOULD BE DETERMINED IN THE FIELD
BASED ON ENGINEERING JUDGEMENT.
NEW TRAFFIC PATTERN AHEAD SIGNS ARE TEMPORARY AND THEY WILL STAY IN PLACE FOR APPROXIMATELY
18 MONTHS.
PORTABLE CHANGEBLANK MESSAGE SIGNS SHALL BE INSTALLED ON GRAY ROAD APPROACHES AT LEAST
14 DAYS BEFORE NEW SIGNS ARE UNCOVERED AND SHALL REMAIN IN PLACE FOR AT LEAST 14 DAYS AFTER THE
PENS MESSAGE SIGNS ARE REMOVED.

FIRST SCREEN	BEFORE CHANGE	AFTER CHANGE
	NEW TRAFFIC PATTERN	NEW TRAFFIC PATTERN
SECOND SCREEN	STARTING	STOP AHEAD

SIGN INVENTORY			
SIGN	SIGN DESCRIPTION	SIZE	QUANTITY
STOP AHEAD (FLASHING)	R1-1	30" x 30"	6
STOP AHEAD (FLASHING)	R1-1	30" x 30"	5
STOP AHEAD (STATIC)	R1-1	30" x 30"	1
STOP AHEAD (STATIC)	R1-1	30" x 30"	1
ALL WAY PLANE	R1-2	30" x 42"	0
NEW TRAFFIC PATTERN AHEAD TEMPORARY	R2-12	30" x 30"	2



7-5-20



Crash Costs and Benefits of Intersection Alternatives

Intersection Alternative	Intersection Type	All-Way Stop?	Major road speed limit (mph) (If observed speeds are high, this can be increased to rounded 85th percentile speed minus 10)	Total Crashes per Year			Crash Estimate to Compare	Crashes per Year for Comparison				Unit Crash Costs (\$)		Crash Costs (\$)		Benefits (\$)	
				Observed	Estimated Predicted	Expected		Total	Injury %	FI (fatal and injury)	PDO (property damage only)	FI	PDO	Annual	Pres Worth (based on 10 years)	Present Worth	Present Worth
Baseline	4ST	No	50	2.60	1.23	1.54	Expected	1.54	38.1%	0.59	0.95	\$391,162	\$10,600	\$239,663	\$1,763,938	-	-
All Way Stop	4ST	Yes	50	2.60	0.21	0.33	Expected	0.33	28.6%	0.09	0.24	\$154,416	\$10,600	\$17,061	\$125,572	\$0	\$0
				-			Expected	0.00	0.0%	0.00	0.00	\$0	\$10,600	\$0	\$0	\$0	\$0
				-			Expected	0.00	0.0%	0.00	0.00	\$0	\$10,600	\$0	\$0	\$0	\$0
Worksheet Source				3A	3A	3A				3B	3B			Discount Rate		6%	

dropdown menu inputs

manual inputs

final results

HSM Analysis

Baseline Present Worth	\$ 1,763,938
All Way Stop Present Worth	\$ 125,572
Safety Benefit	\$ 1,638,366

10-Year Analysis

(See details on sheet named "Intersection Alts (10-year)")

Baseline Present Worth	\$ 2,980,407
All Way Stop Present Worth	\$ 88,127
Safety Benefit	\$ 2,892,280

Recommended Analysis:

10-Year

Baseline Present Worth	\$ 2,980,407
All Way Stop Present Worth	\$ 88,127
Safety Benefit	\$ 2,892,280

Safety Benefit-to-Cost Evaluation

Do you have a cost estimate for the proposed alternative?	Yes
Enter proposed alternative cost	\$20,000
Safety Benefit to Cost Ratio	144.61

CMF ID: 9656

CHANGE INTERSECTION SIGHT DISTANCE

DESCRIPTION:

PRIOR CONDITION: INTERSECTIONS WITH A BASE SIGHT DISTANCE

CATEGORY: INTERSECTION GEOMETRY

STUDY: SAFETY EVALUATION OF GEOMETRIC DESIGN CRITERIA: INTERSECTION SIGHT DISTANCE AT UNSIGNALIZED INTERSECTIONS, HIMES ET AL., 2018

Star Quality Rating:	★★★★ [VIEW SCORE DETAILS]
Rating Points Total:	90

Crash Modification Factor (CMF)	
Value:	$CMF_{T_i} = \frac{\exp(-0.021 \times PSL + \frac{7.194 \times PSL}{ISD_i} + \frac{-243.009 \times LowAADT_{maj}}{ISD_i} + \frac{-177.826 \times MidAADT_{maj}}{ISD_i})}{\exp(-0.021 \times PSL + \frac{7.194 \times PSL}{ISD_{base}} + \frac{-243.009 \times LowAADT_{maj}}{ISD_{base}} + \frac{-177.826 \times MidAADT_{maj}}{ISD_{base}})}$
	where:
	PSL = Posted speed (in mph).
	$LowAADT_{maj}$ = 1 if major road AADT $\leq 5,000$; otherwise 0.
	$MidAADT_{maj}$ = 1 if $5,000 < \text{major road AADT} \leq 15,000$; otherwise 0.
	ISD_i = Proposed or existing available intersection sight distance for the condition of interest i (where $i = 1$ for proposed condition and $i = 2$ for existing condition) (in feet).
	ISD_{base} = Base intersection sight distance for an approach direction (in feet). For practical applications, this value is assumed to be 1,320 feet.

Cumberland Route 26 / Range Road		
Based on Posted Speed of 50		
Increasing Sight Distance from 30 mph to 50 mph		
		0.621
		37.9% Crash Reduction
Posted Speed Limit	50	
Proposed Sight Distance	555	
Low AADT	0	
Mid AADT	0	
Existing Sight Distance	320	

Crash Costs and Benefits of Intersection Alternatives

Intersection Alternative	Intersection Type 3ST (3-leg, 1-stop) 4ST (4-leg, 2-stop) 4SG (4-leg, signal)	All-Way Stop?	Major road speed limit (mph) (If observed speeds are high, this can be increased to rounded 85th percentile speed minus 10)	Total Crashes per Year			Crash Estimate to Compare	Crashes per Year for Comparison				Unit Crash Costs (\$)		Crash Costs (\$)		Benefits (\$)
				Observed	Estimated Predicted	Expected		Total	Injury %	FI (fatal and injury)	PDO (property damage only)	FI	PDO	Annual	Pres Worth (based on 20 years)	Present Worth
Baseline	4ST	No	50	2.60	1.23	1.54	Expected	1.54	38.1%	0.59	0.95	\$391,162	\$10,600	\$239,663	\$2,748,912	-
Improve ISD (320 ft to 555)	4ST	No	50	2.60	0.76	1.05	Expected	1.05	38.1%	0.40	0.65	\$391,162	\$10,600	\$162,869	\$1,868,091	\$0
				-			Expected	0.00	0.0%	0.00	0.00	\$0	\$10,600	\$0	\$0	\$0
				-			Expected	0.00	0.0%	0.00	0.00	\$0	\$10,600	\$0	\$0	\$0
Worksheet Source				3A	3A	3A				3B	3B			Discount Rate		6%

dropdown menu inputs

manual inputs

final results

HSM Analysis

Baseline Present Worth	\$ 2,748,912
Improve ISD (320 ft to 555) Present Worth	\$ 1,868,091
Safety Benefit	\$ 880,821

10-Year Analysis

(See details on sheet named "Intersection Alts (10-year)")

Baseline Present Worth	\$ 4,644,650
Improve ISD (320 ft to 555) Present Worth	\$ 3,156,386
Safety Benefit	\$ 1,488,264

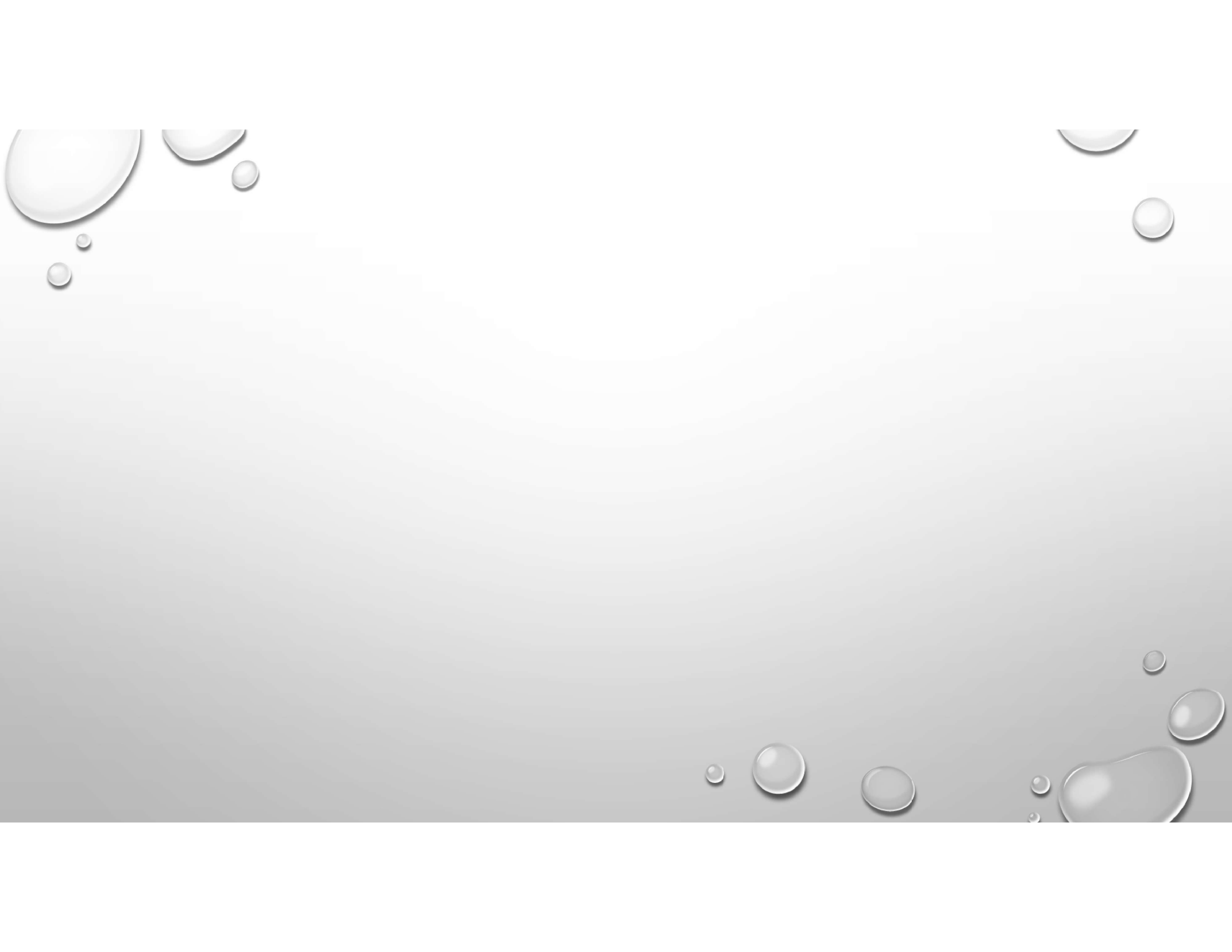
Recommended Analysis:

10-Year

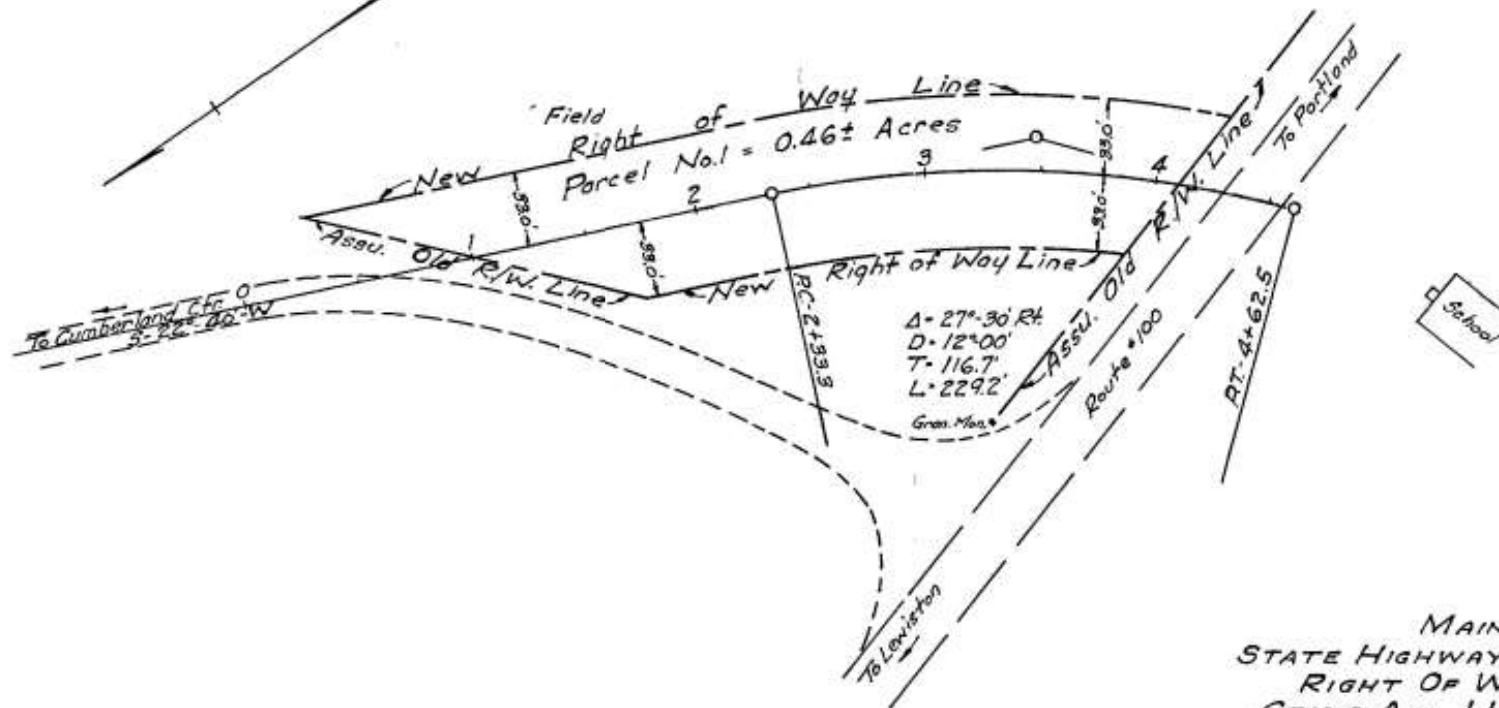
Baseline Present Worth	\$ 4,644,650
Improve ISD (320 ft to 555) Present Worth	\$ 3,156,386
Safety Benefit	\$ 1,488,264

Safety Benefit-to-Cost Evaluation

Do you have a cost estimate for the proposed alternative?	Yes
Enter proposed alternative cost	\$1,200,000
Safety Benefit to Cost Ratio	1.24



Howard L. Winslow



MAINE
STATE HIGHWAY COMMISSION
RIGHT OF WAY PLAN
STATE AID HIGHWAY No. 3
CUMBERLAND
CUMBERLAND COUNTY
Across Land of
Howard L. Winslow
Scale 1 in. = 50 ft. Feb. 1941

SEE REVISED
SHEET 1 FOR
ROW FILE
NUMBER ADDED
02-10-15

Alfred D. Bannery
Chief Engineer

No Record of Conveyance to be Filed

6 2 50