Brig. Gen. Carl W. Reddel, USAF (Ret.) Executive Director Dwight D. Eisenhower Memorial Commission Testimony on "Proposed Dwight D. Eisenhower Memorial" March 19, 2013

The Commission in 2012 and 2013

Since our last hearing, the Commission has been busy completing the memorial design phase. The memorial site, which was approved by Congress on May 5, 2006 (PL 110-220) is a disparate parcel which must be combined into a whole site prior to it becoming a unified square fitting of a presidential memorial. This site, through it is listed in the top three to be developed in National Capital Planning Commission's Memorials and Museums Master Plan, is a difficult site for a memorial. The design developed by Frank Gehry and approved by the Commission masterfully met the design challenges of the site while creating an appropriate, permanent national memorial to General and President Eisenhower, as mandated by the Commission's authorizing legislation.

In 2012, the Commission planned to take the preferred memorial design to the National Capital Planning Commission (which along with the Commission of Fine Arts is responsible for approval of the design) for preliminary approval. Due to opposition that surfaced in the public domain during the latter part of 2011 and early 2012, the Commission directed the design team to meet with individuals who had expressed reservations, including members of the Eisenhower family and members of Congress.

In meetings throughout 2012, including private meetings with designer Frank Gehry, Senator Pat Roberts, a member of the Commission's Executive Committee, and Interior Secretary Ken Salazar, the Eisenhower family had several opportunities to provide direct input regarding potential changes in the memorial design. Mr. Gehry made a number of modifications to the design in response to comments he received, such as the portrayal of Eisenhower in statuary of historic size within the Memorial core. Senator Roberts, along with other key members of the Commission, made extensive efforts to mediate concerns of the Eisenhower family.

Concurrently, the Commission sought to use its available federal funds wisely, and the design team continued developing the memorial's construction documents, which are now over 90 percent complete. In addition, the Commission staff made progress, along with the General Services Administration, in construction procurement developing the electronic memorialization, pursuing the private fundraising campaign, and meeting with Commissioners on memorial quotations. These actions were intended to avoid the prospect of significant delays and attendant expense that would inevitably arise from stopping development activity while further feedback was sought on the memorial design.

About the Eisenhower Memorial Commission (EMC)

The Dwight D. Eisenhower Memorial Commission is a bipartisan Commission created by Congress. It is charged with establishing a national, permanent memorial to Dwight D. Eisenhower to perpetuate his memory and his contributions, specifically his service as Supreme

Commander of Allied Forces in World War II and as 34th U.S. President. This memorial will be of the highest caliber, joining other Washington, D.C. landmarks such as the Washington, Jefferson, Lincoln, Roosevelt and World War II Memorials. It will honor Eisenhower's memory and celebrate his achievements, inspiring and educating all who visit. All of the Commission's activities contribute to realizing this goal.

The Commission was created on October 25, 1999 by Public Law 106-79. As amended, the law states, "The Commission may establish a permanent memorial to Dwight D. Eisenhower on land under the jurisdiction of the Secretary of the Interior in the District of Columbia...."

The Commission consists of twelve members, including eight Members of Congress.

Appointed by the President:

- Rocco C. Siciliano, Chairman (Beverly Hills, CA)
- Alfred Geduldig (New York, NY)
- Susan Banes Harris (Potomac, MD)
- Vacant (Previously filled by David Eisenhower, 2001-2011)

Appointed by the President Pro Tempore of the Senate

- Vacant (Previously filled by Daniel K. Inouye, 2001-2012)
- Jack Reed (D/Rhode Island)
- Pat Roberts (R/Kansas)
- Jerry Moran (R/Kansas)

Appointed by the Speaker of the House:

- William (Mac) Thornberry (R/Texas)
- Vacant (Previously filled by Leonard Boswell, 2001-2012)
- Michael Simpson (R/Idaho)
- Sanford Bishop, Jr. (D/Georgia)

These Commissioners, from New York to California, Rhode Island to Texas, and of course from Kansas, are charged with carrying out the mission to construct the memorial. Commissioners are appointed by either the Speaker of the House or President Pro Tem of the Senate, in consultation with the Majority and Minority Leaders of their respective bodies; or by the President of the United States. All twelve of these individuals were chosen by the government to carry out the public mission of memorializing General and President Eisenhower.

Senior Leadership

Chairman Rocco Siciliano is a World War II combat-decorated infantry veteran who served as Special Assistant to President Eisenhower for Personnel Management.

Senator Daniel K. Inouye was Vice Chairman from 2001 until his death in late 2012. He was a World War II Medal of Honor recipient for valor and continuously represented Hawaii in the United States Congress since President Eisenhower signed its statehood into law in 1959. Senator Inouye, former Chairman of the FDR Memorial Commission, modeled the EMC's

legislation on that previous Commission. Having served on that Commission for over four decades, Senator Inouye drew on his background and expertise on presidential memorialization throughout his service as Vice Chairman of the Eisenhower Memorial Commission

Commission Staff

Executive Director Brig. Gen. Carl Reddel, USAF (Ret.), served as President and CEO of the Eisenhower World Affairs Institute (EWAI) following his retirement from the United States Air Force, where among other responsibilities he was a Professor and Head of the Department of History at the United States Air Force Academy. Gen. Reddel joined the Commission in June 2001.

The Commission is staffed by temporary federal employees in accordance with legislation passed in May 2008 (P.L. 110-229). Brig. Gen. Reddel, the Commission's Executive Director, leads the core staff of eight full-time temporary federal employees and one full-time (the Commission's Executive Architect) and two part-time contract consultants.

Site Selection

In 2005, the Eisenhower Memorial Commission (EMC) completed its review of 26 potential sites for the National Eisenhower Memorial. During this process, at the request of Senator Ted Stevens, the Commission pursued the possible joint development of the memorial with existing plans for a new headquarters of the United States Institute of Peace. Ultimately a proposed joint development arrangement negotiated by the Commission and its Special Counsel, in consultation with the Eisenhower family, was deemed not acceptable by the family and the Commission pursued other possible sites. In November 2004, following a request of the Eisenhower family, the Commission pursued establishing the memorial inside the Yates Building (the Auditor's Building) at the corner of Independence Avenue and 14th St. NW. However, when the matter came before the Commission in March 2005, Commissioner David Eisenhower stated it was not appropriate to put a memorial for one person inside a building named for someone else and that site was no longer pursued.

In June of 2005, after exhaustive investigation, the EMC selected its preferred location—a potentially remarkable four-acre site at the base of Capitol Hill and one of the top twenty sites in Washington, D.C. designated by the National Capital Planning Commission (NCPC) for a future memorial. This site at the intersection of Maryland and Independence Avenues, SW, between 4th and 6th Streets, is prominent, accessible, and has strong thematic connections with Eisenhower.

All of the neighboring institutions were influenced by Eisenhower's presidency. He created the precursor to the Department of Education, immediately adjacent to the site's southern border. He also created the National Aeronautics and Space Administration, whose work is highlighted at the National Air and Space Museum across the street to the north of the site. The site also boasts a stunning view of the U.S. Capitol along the Maryland Avenue view corridor, reflecting Eisenhower's exceptional respect among all Presidents for the authority of Congress.

In May 2006, Congress and the President approved P.L. 109-220, selecting Eisenhower as an appropriate subject for a memorial within Area I, the prominent area of the Capital reserved for memorials of pre-eminent historical and lasting significance to the Nation. In September 2006, both the National Capital Planning Commission and the Commission of Fine Arts voted on and approved the Commission's preferred location as the future site of the Eisenhower Memorial. The site has been informally named "Eisenhower Square."

In 2007, the EMC contracted with Skidmore, Owings and Merrill LLP (SOM) to create the Pre-Design Program to communicate to the prospective designer what the National Eisenhower Memorial should be, including goals, requirements, constraints, and opportunities. This effort included interviews with Commissioners, scholars, authors, Eisenhower family members, Eisenhower contemporaries, and many others.

Selection of Frank Gehry and the Preferred Design Concept

In 2008, the Commission engaged with the General Services Administration's Design Excellence Program for design team procurement. As agreed to by the Commission, the competition was open to any U.S. citizen with a design portfolio. The initial request for proposals garnered forty-four submissions, with four design teams advancing to final consideration.

Following the GSA design team procurement recommendation, on March 31, 2009, the Eisenhower Memorial Commission unanimously selected world-renowned architect Frank Gehry of Gehry Partners LLP as the designer for the National Eisenhower Memorial. Frank Gehry is one of the world's most celebrated architects, and has won the American Institute of Architects (AIA) Gold Medal, the Pritzker Prize, Britain's Royal Gold Medal, Japan's Praemium Imperiale, the Order of Canada, and the National Medal of Arts.

In January 2010, the Commission announced its selection of the Gilbane Building Company for design and construction management services. Gehry Partners and Gilbane's contracts were finalized at the outset of 2010, marking the official beginning of the design process.

On March 25, 2010, the Commission chose the preferred design concept for the National Eisenhower Memorial out of four possible options. The design selected encompasses a world-class memorial and civic space including time-honored memorial elements of sculpture, bas reliefs, tapestry, and quotations in materials which will endure through the ages. From the outset, these included large representations of the General and President.

During the design phase, Frank Gehry immersed himself in General and President Eisenhower's life, traveling to Abilene, Kansas for a first-hand education on the life of his subject at the Eisenhower Presidential Library and Museum. The design team also worked with Eisenhower historians and the senior co-editor of the Eisenhower papers, Professor Louis Galambos, of Johns Hopkins University, to ensure that the design elements were historically accurate and true to their subject.

Memorial Design Phase: 2010-2012

On March 25, 2010, the Commission convened to unanimously choose the preferred design concept for the Memorial out of four possible options. This design encompasses a world-class memorial and civic space combining stunning, never-seen-before elements and time-honored elements of stone and statuary.

In 2010 and 2011, the Commission and design team successfully completed several rounds of meetings with federal review agencies - the U.S. Commission of Fine Arts (CFA), the National Capital Memorial Advisory Committee (NCMAC), and the National Capital Planning Commission (NCPC) (see Appendix I). The design team continued to refine the preferred design concept and alternatives throughout this time, culminating in the endorsement by the Eisenhower Memorial Commission of Frank Gehry's progress on their preferred design in July 2011.

Throughout much of 2011, the design team conducted significant research and testing on potential materials and vendors for the memorial's stunning tapestries, to great positive effect. In late summer 2011, Eisenhower Memorial Commission and CFA and NCPC Commissioners and staff viewed and evaluated tapestry samples from three separate vendors. The Commission hung the best of the tapestry 'mock-ups' on-site in late August and again in September, receiving near-universal acclaim for their transparency and beauty, along with respect for the determination of the design team to get this important feature of the design correct.

In September of 2011, the Commission of Fine Arts unanimously approved the memorial's design concept, noting that the scale was correct, and expressing great enthusiasm for the development of the design and the artistic quality of the tapestry mockups. They further noted that the sophistication of the design and the proposed artistic treatment "will transform the site and the context of adjacent federal buildings."

The stunning tapestry mock-ups also earned admiration from the U.S. Secretary of Education, who welcomed the memorial as a new neighbor in a letter wholeheartedly endorsing the memorial design in October 2011. The Architect of the Capitol also expressed its support for the design in a letter that same month, applauding the Commission's "decision, courage, and commitment of time" to work within the Section 106 process to better the design.

The Commission and design team participated in a series of NEPA/Section 106 meetings throughout 2010 and 2011, named for the section of the National Historic Preservation Act of 1966 (NHPA), which requires federal agencies to take into account the effects of their undertakings on historic properties. The 106 process concluded with a Memorandum of Agreement (MOA) in March 2012, which outlines agreed-upon measures that the agency will take to avoid, minimize, or mitigate adverse effects on historic attributes. A parallel process also addressed the impact of the memorial design on the environment through the Environmental Assessment (EA). The Memorandum of Agreement is necessary before the National Park Service (NPS), the memorial's sponsoring agency, can issue a Finding of No Significant Impact (FONSI), which is the result of the EA. This must occur before NPS can issue a construction permit for the memorial, and before NCPC can approve the memorial's design. This process enables public comment provided by any interested parties, including memorial neighbors, the

government of the District of Columbia, and the public, whose comments were considered carefully by the design team.

In March 2012, the FONSI was issued. This issuance of the FONSI allowed the National Park Service, the memorial's sponsor, to take the Commission's preferred design concept to NCPC to obtain preliminary approval. Throughout the design phase, the Commission and design team worked to mitigate potential obstacles in attaining design approval, keeping Commissioners, their staff, and the staff of the House and Senate Appropriations Subcommittee on the Interior and the Committee on Natural Resources informed during this process.

Although extensive testing on the durability of the materials used for the memorial was always a requirement, this testing was moved up in the design and construction schedule to respond to requests made by the NCPC. The design team performed these tests in consultation with the National Park Service and NCPC staff and at the request of NCPC. The initial study of tapestry engineering and testing data has found that the stainless steel materials are satisfactory. The next stage of testing on the welds will be presented to NCPC prior to final approval.

As a Congressional commission, EMC and design team staff have met with and been particularly responsive to members of Congress, responding to formal and informal requests for information, including a Committee on Natural Resources-Subcommittee on National Parks, Forests, and Public Lands hearing in March 2012. Throughout 2012, the Commission provided fulsome responses to inquiries regarding its activities and the evolution of the memorial design, and has welcomed every opportunity to meet with interested parties, hear comments on the proposed memorial, and address issues that have arisen.

Congressional and Presidential Commissioners played a direct and important role during this time, and EMC staff continues to work in concert with them and their staff to enable communication and feedback. In a May 2012 meeting, the Commissioners endorsed moving forward with the preferred design that was unanimously agreed-upon in 2011. As an on-going process which commenced in 2012, Commissioners have also provided input to staff on the initial stages of determining quotations for the memorial.

The Commission intends to continue its constructive and positive engagement with District of Columbia leaders, including Eleanor Holmes Norton, the Deputy Mayor for Planning and Economic Development Victor Hoskins, and Councilman Tommy Wells, who represents the district within which the Memorial site is located. In 2013, an economic impact report was prepared which estimated the financial gain for the District as a result of the memorial. The report, prepared by Dr. Stephen Fuller and Agnes Artemel of George Mason University's Center for Regional Analysis, concluded that the memorial will generate \$30.1 million in annual visitor spending in the District that would not have been spent in the District in absence of the memorial. This would generate \$39.1 million a year to the District Gross State Product.

The Commission also continues to cooperate with agencies at the federal level, including its ongoing partnership with the Department of Education (DoEd) to establish an attractive and useful promenade between the memorial and the main entrance of the neighboring Lyndon B. Johnson building. Commission staff has maintained coordination with officials from Secretary Duncan's office and GSA in order to enhance and activate the area adjacent to the memorial. This work builds on the letter the Commission received from Secretary of Education Arne Duncan in

October 2011, which expressed his pleasure at the memorial design and "the great potential for public engagement that the memorial will bring" to the DoEd, including enhancements such as space and facilities for new exhibits, meetings, events, and even retail. In 2013 and throughout the construction phase, the Commission will continue to work with the DoEd to bring this plan to reality.

The Commission also works in partnership with the National Archives and Records Administration and the Eisenhower Presidential Library and Museum in Abilene, Kansas. This relationship enables the Commission to benefit from established federal resources in order to ensure that the memorial is an authentic representation of the Eisenhower historical legacy.

Over the years, taxpayers have created a superb data base in the Eisenhower Library. Eisenhower's national memorialization will enable the sharing of this existing resource with the nation and the world. This partnership continues to be particularly useful as the Commission develops the E-Memorial, which is the on-site and off-site electronic memorialization of the president and general. The Commission expects that, once the memorial is completed, its prominent presence in the nation's capital will draw further attention to the library, cementing the reciprocal relationship between both entities. E-memorial development was a priority for the Commission in 2012, and the first phase of the E-memorial, focusing on the Commission's website, has already been completed.

The National Park Service, the memorial's sponsor, continues to play a key role in completing the design phase of the memorial and moving onto the construction phase. The completion of the FONSI in 2012 and the attainment of preliminary and final approval from NCPC in 2013 are necessary prior to ground-breaking. NPS and the Secretary of the Interior have played an active role in moving the National Eisenhower Memorial closer to fruition. In 2012, the NPS commissioned a Total Cost of Facility Ownership report which concluded that the expected cost of memorial operations and maintenance is comparable to the Martin Luther King, Jr. Memorial. NPS' leadership in sponsoring the memorial at NCPC and CFA approval reviews will ensure that memorial construction continues without delay in 2014 and 2015.

Description of the Memorial Design

The National Eisenhower Memorial in Washington, DC uses the traditional memorial forms of sculpture, bas relief, tapestries, realistic images and quotations, to honor Ike's unparalleled achievements in behalf of his country. For over 1,000 years, societies have employed these classic elements to recognize and memorialize their great leaders. In the design for this first presidential memorial to be built in our 21st century, Frank Gehry, America's foremost architect, has designed a memorial which speaks to Ike's great achievements while recognizing his humanity.

Unlike other presidential memorials in Washington, DC, the Eisenhower Memorial will be located within a new urban park space, flanked by District streets. The Eisenhower Memorial is set within four acres of new parkland directly across from, and south of, the National Air and Space Museum. The memorial honors Eisenhower's achievements as the Supreme Allied Commander in World War II and as the 34th U.S. President in heroic-scale free standing bronze

sculptures and bas reliefs on monumental stone blocks. Quotations from some of his most memorable speeches will be inscribed on nearby walls. Completing the powerful sculptural composition, a human-scale realistic statue of Eisenhower as a young man will be looking out to the images of the great military leader and president he will become. The setting for the memorial is elegantly created by an 80-foot tall limestone-clad columns supporting woven, stainless steel tapestries, which depict the Kansas plains where he grew up and where he developed the values and character which helped guide him to greatness.

Pedestrians will arrive at the site from all four corners of Eisenhower Square, entering by passing under one of the tapestries, and converging in the center at the memorial itself. The positioning of the stone sculptures and bas reliefs and the quotations wall create an area for quiet contemplation within, but separate from, the more active urban civic space. The memorial visitors will be able to talk to National Park Service rangers to learn more about Eisenhower. Group seating areas are provided throughout the site for school groups to gather and participate in presentations and discussions with their teachers.

The memorial is separated from its nearest neighbor, the U. S. Department of Education, by the 50-foot wide LBJ Promenade. This pedestrian promenade design provides an unprecedented enhanced opportunity for the Department to engage with the public through interactive exhibits and other forms of outreach. An overlook at Promenade level provides a large, elevated gathering space for the Department and for visitors to view the memorial.

The memorial design masterfully creates an allee of trees along the portion of Maryland Avenue which formerly traversed the site. The commanding vista along the allee to the east directs the memorial visitor's eye to the dome of the Capitol, in part to recognize Eisenhower's extraordinarily collaborative and productive relationship with Congress.

E-Memorial

In March 2004, the Commission adopted a formal resolution in which it declared that the Eisenhower Memorial would be composed of both a physical memorial and a living memorial. The living memorial was described as including "sponsored historical or policy research, publications, public presentations, commemorations or programs that will advance and perpetuate the legacy of Dwight D. Eisenhower and his contributions to the United States of America." In an effort to further define this latter concept, the Commission authorized a grant of up to \$400,000 to the Eisenhower World Affairs Institute, then headed by Susan Eisenhower, with a mandate to coordinate with the existing Eisenhower legacy organizations and to develop a proposal suitable for adoption by the Commission. The report produced by the Eisenhower World Affairs Institute reflected a lack of consensus of the legacy organizations and did not embody actionable recommendations for Commission as to how its objective of a living memorial might be achieved.

In 2007, the six legacy organizations jointly agreed that their existence represents the Living Memorial to Dwight Eisenhower and they unanimously supported the idea of electronic representation of themselves and their work within the physical elements of the memorial. This concept, which we refer to as the E-Memorial, is presently being developed.

The National Eisenhower Memorial will be the first national presidential memorial of the 21st century and the first to incorporate an electronic companion memorial. The Commission has selected the New York City-based, award-winning media design firm, Local Projects, to design the E-Memorial.

The E-Memorial consists of an on-site component and an off-site (website) component. Through a downloaded app, visitors will use their personal mobile devices to enhance the visit to the physical memorial. This app will provide a superior educational experience. There will also be resources available for teachers planning a visit. National Park Service Ranger commentary will be available for those who choose not to use their personal electronic devices. This technology is flexible enough to be updated. The Commission is coordinating with the Eisenhower Library in Abilene, Kansas, and the National Archives and Records Administration, to ensure that these already-established federal resources have a role in the continued interpretation of the E-Memorial, to ensure that the information remains accurate and interesting.

Federal Contracting and Oversight

The U.S. General Services Administration-National Capital Region (GSA-NCR) Public Buildings Service is the contracting agent for the Eisenhower Memorial Commission for the above work. The National Capital Region GSA office is designated to assist public commissions such as the EMC in the procurement and management of the above types of contracts. The Commission's Design and Construction Management Consultant directly serves GSA staff in executing these responsibilities.

Funding

At the outset of the Commission's activities, a study was undertaken of Presidential memorials in Washington DC. It was determined that there are six national Presidential memorials, to Washington, Jefferson, Lincoln, Franklin Roosevelt, Theodore Roosevelt, and John F. Kennedy. These memorials were principally funded by the government, the most recent of which was the FDR memorial which was 89 percent federally funded. Members of the Eisenhower family have expressed concerns since the initial days of the Commission that any private fundraising for the Memorial could negatively impact the fundraising of the legacy organizations. Initially, it was intended that there be no private fundraising for the Eisenhower Memorial.

As the Commission is a member of the Legislative branch, as opposed to a private initiative, it has been entirely funded by federal funds. In 2008, the House Appropriations Subcommittee on the Interior advised the Commission that it was expected that there be a private funding component for the Memorial. No specific amount was given. In 2011, the Commission hired Odell, Simms & Lynch, a firm with fundraising experience for memorials and other public projects, to lead a private fundraising effort.

The estimated cost for the construction of the memorial, including operating the Commission, site preparation, construction of the memorial, GSA fees, and a construction management firm, is \$114.8. The Commission has requested 80 percent federal funding, approximately \$90 million.

For FY2012, the Commission received one third of its request, \$32.9 million to begin construction of the memorial. Because preliminary approval from NCPC is delayed until later this year, the EMC does not need FY 2013 construction funds.

Conclusion

In conclusion, we at the Commission – both our Commissioners and staff – are appreciative of the opportunity to come before you today for this discussion of the memorial. As you can see, the Commission has been working for well over a decade in a sincere and dedicated effort to memorialize one of our Nation's great Presidents of the 20th century.

The commission has been faithful to the proscribed GSA processes for both the design competition and contracting protocols. It is important to note that in terms of both time and money, a large investment has been made. The selection process yielded the premier designer and architect of the 21^{st} century to lead this landmark effort.

This has been a deliberative and extensive process from the beginning, with over 23 public meetings that provided a forum for public comment. The Commission has greatly benefitted from the participation of the Eisenhower family via David Eisenhower's participation as a Commissioner for a decade. As well, members of the family have appeared at Commission meetings and Frank Gehry has held several meetings with the family, particularly over the last year, to obtain their input, and has made changes to the design as a result.

The Commission of Fine Arts has unanimously given its concept approval of this design, citing the beauty of the tapestries and the appropriateness of the memorial's scale. As we stand today, the design stage is near completion.

It is time to build this memorial.

APPENDIX I PUBLIC MEETINGS HELD FOR THE EISENHOWER MEMORIAL DESIGN

PUBLIC MEETINGS

<u>Date</u>	Meeting	Location
2/19/2010	Soft Launch	NPS, 1100 Ohio Drive
4/21/2010	Scoping	Old Post Office
5/21/2010	Section 106	NPS, 1100 Ohio Drive
3/1/2011	Section 106	NPS, 1100 Ohio Drive
3/30/2011	Section 106	Old Post Office
6/20/2011	Section 106	Dept. of Ed. (LBJ Bldg)
8/31/2011	Section 106	GSA ROB
10/4/2011	Section 106	NPS, 1100 Ohio Drive
10/19/2011	Section 106	NPS, 1100 Ohio Drive
11/16/2011	Section 106	NPS, 1100 Ohio Drive

TOTAL: 10

AGENCY MEETINGS Open to the Public

<u>Date</u>	Agency
3/25/2010	Eisenhower Memorial Commission – preferred design concept
4/20/2010	National Capital Memorial Advisory Commission (NCMAC)
5/20/2010	U.S. Commission of Fine Arts (CFA) - info
6/3/2010	National Capital Planning Commission (NCPC) - info
1/20/2010	CFA – concept approval
2/3/2011	NCPC – concept comments
2/16/2011	NCMAC
7/12/2011	Eisenhower Memorial Commission – revised concept approval
9/14/2011	NCMAC
9/15/2011	CFA – revised concept approval
10/6/2011	NCPC - info
5/15/2012	Eisenhower Memorial Commission – presentation of design
	development

TOTAL: 12