

AUTOMOBILE STATISTICAL PLAN 2008

QUICK REFERENCE GUIDE

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General Information

On April 1, 2006, the General Insurance Statistical Agency (GISA) was appointed as a statistical agent by the participating insurance regulatory authorities to provide governance, accountability and oversight of the mandated statistical plans. GISA has a service agreement with Insurance Bureau of Canada (IBC) such that IBC provides statistical plan services under specified terms and conditions and receives from insurers the information prescribed by the plan.

GISA has approved new data elements for the Automobile Statistical Plan to be reported by insurers to IBC commencing January 2008.

This reference guide contains information to assist you in implementing the changes to the statistical plan. The “Frequently Asked Questions” section is updated from time to time. The most recent additions or modifications to the questions and answers are marked with vertical lines at the left of the text.

New Data Elements

The following table contains the new data elements included in the 2008 Automobile Statistical Plan.

DATA	DESCRIPTION OF CHANGE
Conviction History	Reporting of this information is required for all provinces.
Deductible Amounts	New fields to report deductible amounts replace deductibles embedded in the coverage codes. New coverage codes have been created as a result.
Driving Record Codes	For Policy Effective Dates on or after January 1, 2008: <ul style="list-style-type: none"> ❑ Code '7' is redefined to mean a driving record rating instead of 'Trailer'. ❑ Code '9', Fleet Rated and Miscellaneous Risks, is not required.
FA Clean Driver Indicator	New field for Facility Association to identify that the driver was rated as having a clean driving record.
Group Marketing Indicator	New field added to indicate that a policy was written under a group marketing plan.
Kind of Loss Code	New Kind of Loss codes have been added for Comprehensive kinds of loss. The new codes are effective with Accident Dates on and after January 1, 2008, regardless of Policy Effective Date.
Liability Limit Amounts <i>and</i> Underinsured Motorist Limit Amounts	New fields to report Third Party Liability Limit Amounts and Underinsured Motorist Limit Amounts.
Number of Years Claim Free	Field expanded from one character to two to accommodate the reporting of actual number of years.
Number of Years Licensed	Field expanded from one character to two to accommodate the reporting of actual number of years.
Record Format Version	Field added to the Premium and Claim Record format to identify the version of the record format.
Third Party Liability (New Brunswick)	Third Party Liability Coverage must be reported as split across BI, PD and DCPD for New Brunswick as well as Ontario.

DATA	DESCRIPTION OF CHANGE
Trailer Indicator	New field identifying the risk as an attached trailer.
Vehicle Location Postal Code	New field to report the first 3 characters of Postal Code (FSA).
Vehicle Rate Groups	Vehicle rate groups have been added as a future requirement.
Vehicle Rate Group Types	Vehicle rate group types have been added as a future requirement.

NOTE: Outstanding Losses must be reported quarterly instead of semi-annually. Facility Association Servicing Carriers (Plan 9) are still required to report Outstanding Losses monthly.

Expanded Fields

The following fields have been expanded:

FIELD	COMMENT
Claim Identification	These fields have been expanded to accommodate the actual policy and claim identifiers used by insurers. For policies with Policy Effective Dates prior to January 1, 2008, data in these fields MUST be reported in the current format.
Policy Identification	
Third Party Accident Driver Policy Identification	
Exposure	These fields have been expanded to accommodate larger numbers.
Premium Amounts	
Kind of Loss	These fields have been expanded for future use.
Vehicle Code	
Accident Date	These date fields have been expanded to include the century.
Endorsement/Cancellation Date	
Entry Date	
Policy Effective Date	
Policy Expiry Date	
Rated Operator Year of Birth	
Vehicle Model Year	

Eliminated Data Elements

These data elements have been eliminated; they do not appear in the new 600-byte record format of the 2008 Automobile Statistical Plan.

DATA	REASON FOR CHANGE
Bill 59 Optional Benefits	These fields are no longer required.
FA Policy Identification	This information on the Claim record is redundant with the ASP Policy Identification.
OMPP Benefits	These fields are no longer required.
Submission Number	Submission Number is no longer required in the Premium and Claim records.
Vehicle Validation Type	This field is no longer relevant because VIN and RIN are now reported in separate fields.

Impact of New Processing

The situations noted below are brought to your attention because either the content or the processing of these fields may have changed.

FIELD(S)	ISSUE
All fields: Default values	Specified default values MUST be used in all fields where data is not supplied. Except for premium and claim amount fields and premium exposures, the default value is blank. For the amount and exposure fields (premiums and claims), the default is zero, however, blank may also be used as the default value.
Date-specific fields	Fields that require data ONLY between specific dates MUST be left blank outside of these dates.
Excluded Driver	This is required ONLY for Individually Rated Private Passenger Vehicles in Ontario and MUST be left blank in all other situations.
First Party Vehicle Total Loss Indicator	This field is applicable ONLY to Kind of Loss codes for physical damage coverages.
Garage Policies	Transactions reported with Type of Use 8x MUST be reported with Type of Business Code 3.
Provincially specific fields	Fields that are required ONLY for specific jurisdictions MUST be left blank for other jurisdictions.
Rated Operator Information	Rated Operator Information, including Number of Years Claims Free and Number of Claims, are required ONLY for private passenger vehicles and other personal use vehicles according to the Statistical Plan; for all other vehicle classes, these fields MUST be left blank.
Reserved fields	Both the premium and claim records contain fields that have been reserved for future use. These fields MUST be left blank.
UITS Transaction Type	UITS Transaction Types 'R' and 'S' (Recovery and Salvage) are applicable ONLY to Kind of Loss for physical damage coverages.
Vehicle Code	Vehicle codes are required ONLY for private passenger vehicles, motorcycles, ATVs and snow vehicles; for other vehicle classes this field MUST be left blank. For attached trailers, three options are available: <ul style="list-style-type: none"> <input type="checkbox"/> Report the vehicle code of the towing vehicle; <input type="checkbox"/> Leave the field blank; or <input type="checkbox"/> Report a special trailer code (T followed by three numeric)
VIN and RIN	The existing VIN field has been split into separate fields for VIN and RIN. The RIN field MUST be left blank outside of Ontario.

Implementation

Automobile submissions can be reported in either the current 450-byte record format or the new 600-byte record format, as outlined in the following table:

Entry Dates Oct. 2007 and prior

Policy Effective Date	Received at IBC		
	< Jan. 1, 2008	Jan. 1, 2008 – Mar. 31, 2008	≥ April 1, 2008
< Jan. 1, 2008	Current 450	Current 450	New 600 OR Current 450
≥ Jan. 1, 2008	Current 450	Current 450	New 600 OR Current 450

Entry Dates Nov. 2007 – Dec. 2007

Policy Effective Date	Received at IBC		
	< Jan. 1, 2008	Jan. 1, 2008 – Mar. 31, 2008	≥ April 1, 2008
< Jan. 1, 2008	Current 450	Current 450	New 600 OR Current 450
≥ Jan. 1, 2008	New 600 ¹	New 600	New 600

Entry Dates on and after Jan. 1, 2008

Policy Effective Date	Received at IBC		
	< Jan. 1, 2008	Jan. 1, 2008 – Mar. 31, 2008	≥ April 1, 2008
< Jan. 1, 2008	New 600 ²	New 600 ²	New 600 ²
≥ Jan. 1, 2008	New 600	New 600	New 600

More detailed information about the dates, reporting formats and transmission methods is available in the *Data Submission Requirements Manual*.

¹ IBC will hold these files until the system is ready in Jan. 2008. See also FAQ section 5.

² See FAQ section 5 for exceptions regarding run-off companies.

Documentation

To assist insurers with the new requirements, a number of documentation pieces have been prepared.

Automobile Submission Format 2008 - Transition Guide

This document was published in July 2006 to provide insurers with advance information regarding the upcoming changes. This document is no longer current and should be referenced with caution.

Automobile Statistical Plan

The *Automobile Statistical Plan* was published in December 2006 by GISA, and subsequently by IBC with all UITS requirements incorporated. This document is the authoritative source regarding requirements for reporting data to GISA.

Note that the only difference between the GISA and IBC versions is the incorporation of UITS requirements in the IBC publication. The IBC version is also fully integrated with the *Edit Rules Documentation*.

The *Automobile Statistical Plan* is available for download from either GISA's website (www.gisa-asag.ca) or IBC's website (www.ibc.ca).

Edit Rules Documentation

The *Edit Rules Documentation* includes all validity and consistency error codes and their corresponding editing procedures. It also includes direct links to the field codes in the *Automobile Statistical Plan* when downloaded from IBC's website in accordance with the specific instructions provided.

Data Submission Requirements Manual

This document defines all technical reporting requirements, including naming conventions, headers and trailers, and file transmission methods. The *Data Submission Requirements Manual* was published in March 2007.

Frequently Asked Questions

1. EDITING PROCEDURE

1.1. *Is FSA validated against Statistical Territory?*

No; FSA is checked against Province (which is derived from Statistical Territory).

1.2. *What happens if we continue to report data that has a stop date?*

Data that has a stop date associated with either the value or the field can no longer be reported and affected fields MUST be left blank. Reporting data after the stop date will result in an error.

1.3. *Is there a summary of hard and soft errors in the 2008 reportings?*

All errors are hard errors, with the following exceptions:

- VIN algorithm errors for Ontario non-Private Passenger Vehicles
- VIN algorithm errors outside Ontario
- VIN and Vehicle Code/Model Year consistency errors for Ontario non-Private Passenger Vehicles
- VIN and Vehicle Code/Model Year consistency errors outside Ontario
- RIN algorithm errors
- Driver License Number algorithm errors for Third Party Accident Driver.

1.4. *What happens when data is reported in fields where such data is not required according to the ASP?*

Reporting data or values where such data is not required will result in an error, because otherwise it would result in unintended consequences in various downstream processes, such as regulatory exhibits, CLEAR and various fraud detection and underwriting tools used on a daily basis by the industry in serving the consumer.

Both the *Automobile Statistical Plan* and the *Edit Rules Documentation* identify all the situations where data is required and the valid values. Acceptable default values of blank or zero are also noted. Reporting data or values not specifically noted in the documentation will result in an error.

2. ERROR PROCESSING

2.1. *What happens to the old errors on EEC in the old format?*

Eventually you will be given a deadline to clean up all outstanding errors; the EEC system on the old record format will be phased out.

2.2. *When will the errors from the new record format be available on EEC?*

The new error correction facility will be available during the industry test period in the fall of 2007 and will be available in the production environment on the “go-live” date – January 1, 2008.

2.3. *Do we still have 30 days to correct errors?*

Yes; although the requirement to report the original submission was changed some time ago to 15 days after the end of the month being reported, 30 days are still allowed for correction of errors. Refer to Bulletin AU-2005-01.

3. FIELD FORMATS AND DEFINITIONS

3.1 *What is the difference between a standard and a non-standard deductible?*

Deductibles are used for physical damage coverages (including DCPD) and are reported as the actual dollar values used in rating the risk. Distinctions are made between “standard” and “non-standard” deductibles; this distinction is related to the type of the deductible and NOT to the amount of the deductible.

A **standard deductible** is one with a fixed dollar value that is the same whether one is rating the risk or adjusting a claim. Waiving of the deductible in certain claim situations does not make an otherwise standard deductible into a non-standard deductible.

Whether or not a deductible is standard is NOT related to the amount of the deductible; for example, both a fixed-dollar \$500 deductible and a fixed-dollar \$650 deductible would be considered standard deductibles. A deductible calculated as a percentage of the price of the vehicle is a standard deductible and must be expressed as a dollar amount for reporting purposes.

A **non-standard deductible** is any deductible that cannot be categorized as a standard deductible, which is the same whether one is rating the risk or adjusting a claim. Examples of such deductibles include disappearing deductibles, which vary with the size of the claim, and discounted deductibles, where the actual deductible on claims would vary according to the claimant’s driving experience.

3.2 *How is “group marketing” defined?*

Referred to in subsection 16(5) of the Ontario Insurance Act, a “group marketing plan” is an arrangement made in writing between an insurer and a sponsor to market automobile insurance to members of an organized group.

3.3 *What is the definition of Years Licensed, including when there has been a suspension?*

Report the number of years the operator has been legally permitted to operate a vehicle in Canada or the United States (i.e., excluding any amount of time the license was suspended).

3.4 *How do we report the number of years claim-free?*

If the rated operator is the principal operator, report the number of years of claim-free private passenger vehicle, moped or on-road motorcycle operation of the operator with the least number of years of claims-free experience, excluding any separately rated occasional operators.

If the rated operator is a separately rated occasional operator, report the number of years of claim-free private passenger vehicle, moped or on-road motorcycle operation of the operator with the least number of years of claim-free experience of all occasional operators on the policy to whom the separate rate applies.

3.5 *The documentation states that we will need to provide the G2 license date, but the MVR abstracts provide only the G1 license date. Therefore, won't it be difficult to obtain and provide the G2 date?*

The definition in the ASP is meant to standardize the definition of Number of Years Licensed at the request of industry representatives. It should be the number derived from the application form and used by the insurer in rating the risk.

3.6 *We will have to begin reporting the postal code of where the vehicle is garaged or "primarily used." Can you clarify what will be considered "primarily used?"*

An insurer may rate the vehicle using a location that is different from the garaging location because it is the location where the vehicle is driven or primarily used. Both the Statistical Territory and Postal Code FSA reflect the location the company uses to rate the risk. Therefore, the definition of "primarily used" for the purposes of Postal Code FSA is identical to its definition for the purposes of Statistical Territory in the current Statistical Plan.

3.7 *What is meant by "clean" in the FA Clean Driver indicator?*

It varies by province. Companies should check FA Rule 102.B, which in Ontario reads as follows:

"Clean Driver Discount

Where a risk meets the following requirements, a 10% discount shall be applied to the Liability, Accident Benefits, UA, DCPD and Collision or Collision portion of All Perils premiums.

- No regular or frequent driver of the vehicle has had any major, minor or serious convictions in the 36 months immediately preceding the commencement of the insurance.
- No at fault accidents have been assigned to the vehicle or its substitute within the 60 months preceding the commencement of the insurance.
- No cancellations for non-payment have been assigned to the Applicant within the 36 months immediately preceding the commencement of the insurance.
- All drivers of the vehicle hold a valid Canadian driver's license."

3.8 *Does the new field "FA Clean Driver indicator" apply to Risk Sharing Pool policies?*

Not at this time; the Automobile Statistical Plan does not collect information for the Risk Sharing Pools.

3.9 *My interpretation of the Trailer Indicator is as follows: The indicator is 'Y' when type of use = 65, and is 'N' in all other cases. Is this correct?*

No. The Trailer Indicator is used to signify that the reported information reflects an attached trailer (e.g., utility trailer, tent trailer, snowmobile trailer, etc.). Type of Use 65 signifies an unattached trailer home, which is NOT considered an attached trailer.

3.10 *What is the format you are expecting for the reporting of deductible amounts?*

Deductible amounts are numeric and are reported right-justified and zero-filled.

3.11 *How do we report a 4-character vehicle code in the new 6-character field?*

The Vehicle Code field has been expanded for future use. Report the existing 4-character vehicle codes left-justified and blank-filled.

4. FIELD REPORTING REQUIREMENTS

4.1 GENERAL

4.1.1 *Do we report a deductible value for a non-standard deductible?*

Yes; report the value used in rating the applicable physical damage coverage.

4.1.2 *We don't have the conviction information for the premium transaction until we collect the MVR later, so how do we report this?*

Report the conviction information used to rate the risk. If any new information is obtained after the data is submitted, use an offset/onset transaction to report the change. This is the same procedure used to report a change in location and a change of vehicle.

Please remember that the information on any claims transaction must match the information on the premium transaction.

4.1.3 *How do we report Retiree Discount, where we don't offer such a discount?*

The Retiree Discount field must be filled in only for individually rated private passenger vehicles in Ontario; outside Ontario and for other classes of vehicles in Ontario, this field MUST be left blank.

4.1.4 *Can we continue to report New Brunswick Third Party Liability as one coverage?*

No; for transactions with Policy Effective Dates on or after January 1, 2008, the Third Party Liability premium must be reported split across BI, PD and DCPD (similar to Ontario).

4.1.5 *How do we report optional Accident Benefits fields in the new 600-byte format?*

These fields have been eliminated in the 600-byte format. This applies to all policies and claims regardless of Policy Effective Dates.

4.1.6 *For some fields, it is written "Prior to 2008 only." Does that mean that we don't have to fill in those fields for January 2008? And the implementation date has changed to January 7, 2008; so is this now the "before and after" date for everything in the transition guide?*

Third Party Liability limit codes and certain other fields are not to be used for transactions with Policy Effective Dates on and after January 1, 2008; the "prior to 2008" qualifier refers to Policy Effective Dates, NOT to the implementation date of the new system. The fields are provided in the new 600-byte format to allow for reporting of transactions with Policy Effective Dates prior to January 1, 2008. For transactions with Policy Effective Dates on and after January 1, 2008, these fields MUST be left blank.

4.1.7 *What would be the Driving Record value for type of use '65' now that we are no longer reporting the value '7'?*

Report the Driving Record value used in rating the risk for the applicable coverage.

4.1.8 *How should the sign (positive or negative) be reported in amount fields?*

The sign applicable to amount fields will be indicated by the Transaction Type.

Inclusion of positive or negative signs in amount fields will result in an error.

4.1.9 *The Automobile Statistical Plan available on the GISA website does not include the UITS fields and indicates all these as "reserved fields." Are the UITS fields still required?*

The scope of the GISA Automobile Statistical Plan does not include UITS fields, which are mandated under the Facility Association Plan of Operation. All UITS fields remain mandatory and can be found in the Automobile Statistical Plan available on IBC's website.

4.1.10 *Please clarify the reporting of new codes/values related to policies having Endorsement transactions in 2008.*

All new codes/values apply for transactions with a Policy Effective Date of January 1, 2008 or later, except for the new Kind of Loss codes, which are effective for transactions with an Accident Date of January 1, 2008 or later.

4.1.11 *How do we report conviction information if we receive additional information mid-term?*

If new information becomes available mid-term, report that information upon renewal. However, if a claim occurs within the current policy term you must report the same conviction information which you reported on the premium transaction.

4.2 FLEETS

4.2.1 *What should be reported in the Driving Record field for fleets?*

Driving Record is not required for fleets and MUST be left blank.

4.2.2 *What should be reported in the Vehicle Location Code field for fleets?*

This is similar to reporting of Statistical Territory and MUST reflect the garaging or principal use of the vehicle; in the case of a multi-location fleet it should reflect the head-office location.

4.2.3 *What should be reported in the Collision/All Perils/Comprehensive Deductible Amount field for fleets?*

Report the specific deductible amount used in rating the risk. Refer to the definition of deductibles in question 3.1.

4.3 ATTACHED TRAILERS

4.3.1 *Is operator information required for trailers?*

No; operator information is not required for trailers and the fields MUST be left blank.

4.3.2 *What Driving Record value must be reported for attached trailers?*

Report the Driving Record value used in rating the risk for the applicable coverage.

4.4 FACILITY ASSOCIATION**4.4.1 *How do we report FA fields if we are not a servicing carrier?***

If you are not a Facility Association Servicing Carrier, these fields MUST be left blank.

4.4.2 *What do we report in the Insurance Fraud Convictions field?*

This applies to individually rated policies for Facility Association Servicing Carriers only and MUST be left blank in other situations.

4.5 UITS**4.5.1 *In regard to the requirement to report both the VIN and the RIN: When a vehicle is leased, the RIN on the vehicle portion of the ownership is different than on the plate portion. Do you know which RIN should be reported?***

The RIN field is required ONLY on fleet transactions and ONLY in Ontario. For individually rated vehicles - Type of Business = 0, 1, 2, 8 or 9 - this field MUST be left blank. If Type of Business is 4, you have the option to report the RIN or the VIN if the fleet is reported on a per-car basis. When reporting the VIN, the RIN field could have either the RIN value or be left blank. If Type of Business is 3 (including bulk-rated fleets), the VIN field should always be NOT APPLICABLE and the RIN MUST be reported (see exceptions in the *Statistical Plan*).

4.5.2 *Will the RIN be required for all vehicles or just new business?*

RIN has been required for transactions since 2001 and is required for all fleet-rated vehicles in Ontario.

4.5.3 *When are we supposed to fill in the Registrant Identification Number (RIN) field or the Vehicle Identification Number (VIN) field or both?*

For individually rated vehicles, VINs MUST be reported. For fleets, the RIN MUST be reported if VINs are not available. For fleets rated on a bulk basis, the RIN MUST always be reported.

4.5.4 *Do we have to report VINs on vehicles that are unplatd and unregistered?*

Yes; for individually rated vehicles, VINs must be reported whether the vehicle is plated/unplated or registered/unregistered. Refer to question 4.5.3 above.

5. IMPLEMENTATION

5.1 *How do we report 2008 renewals (or new business), which would normally be reported in 2007?*

IBC's new data collection system will not be ready until January 2008. The preferred approach is for companies to hold these transactions and report them in 2008 in the new format with the Entry Dates appropriately reflecting when the business was entered in your accounting system. You may also report them in a separate file in the new 600-byte format, and IBC will hold the transactions until the system is ready.

You may also choose to use these files in the test environment (see Section 7, below) to get an early indication of the quality of the data.

For supplementary information, please refer to the chart in the "Implementation" section of this guide.

5.2 *What is the impact on submission balancing if 2008 renewals are held and not processed?*

To ensure balancing with your financial system, advance new business and renewals should always be reported with the Entry Date that corresponds to the date the transaction was recorded in your company's books; for example, advance new business/renewals for 2008 booked in November 2007 should be reported with November 2007 Entry Dates.

Submission balancing will be affected, and you should consult with your designated Data Quality Analysts during this period regarding the "out-of-balance" situations. You will not be penalized for these types of situations.

5.3 *If a company is ready to report in the 600-byte format in November 2007, can it send in all transactions in the 600-byte format regardless of the Policy Effective Date?*

No. In order to minimize impact on 2007 year-end exhibit production, the transition strategy requires that 2007 transactions with Policy Effective Dates prior to January 1, 2008 be reported in the current 450-byte record format.

For supplementary information, please refer to the chart in the "Implementation" section of this guide.

5.4 *What is the impact if we are not ready for 2008 reportings?*

As directed by GISA, all current rules for timeliness and accuracy of data will apply.

5.5 *What about run-off companies? They have no data with Policy Effective Dates in 2008.*

Because run-off companies will not have new policies in 2008 and later, the new data requirements do not apply to them. Run-off companies may continue to report in the existing 450-byte record format. However, starting in April 2008, their files must be submitted using the new naming convention and file transfer mechanisms.

5.6 *Can we report old claims in the new 600-byte format?*

Yes; in fact, starting with January 2008 Entry Dates, all claims data MUST be submitted in the new record format, regardless of Policy Effective Date.

6. SUBMISSION REQUIREMENTS

6.1 *If the Secure File Transfer option does not work, can we use one of the other options?*

Yes; there are three options for data submission. Please consult the *Data Submission Requirements Manual* for details on the methods.

6.2 *If IBC receives the same file twice, how will IBC handle the second file?*

The procedure is the same as today; that is, if the batch trailer information is identical to that of a previously reported batch, the file will be placed on hold for confirmation with the company.

6.3 *How do I add the Plan and Kind to the header?*

The last qualifier of the dataset name identifies the Plan and Kind. Detailed information about the naming convention and submission requirements can be found in the *Data Submission Requirements Manual*.

6.4 *Will there be one FTP site?*

There will be two FTP sites. A new FTP site will accept the new automobile submissions. The existing FTP site will remain available to accept non-automobile submissions.

6.5 *How do we identify a “test” submission?*

“Test” submissions will be reported on a separate file from production submissions and will be identified by a qualifier in the file name, as defined in the *Data Submission Requirements Manual*.

6.6 *What is the required frequency of submissions in the new format for the different files – Premium, Paid Losses and Outstanding Loss Reserves? I believe that the latter changed from bi-annually to quarterly, but did the others change?*

The submission frequency for Outstanding Loss Reserves has changed to quarterly; all others remain unchanged.

6.7 *The Data Submission Requirements Manual does not specify where the sign for the dollar amount in the Trailer record is to be reported. How should this be reported?*

The sign of the dollar amount in the Trailer record must be placed following the amount (i.e., in position 34). The acceptable values for the sign position are “+” or blank for positive amounts and “-” for negative amounts. The *Data Submission Requirements Manual* will be updated to specify this requirement.

7. TESTING

7.1 *How do we test data submissions? What happened to PRIME?*

PRIME will be replaced with a new test environment incorporated in IBC’s new data collection system.

The *Data Submission Requirements Manual* contains detailed information about submitting test data to IBC.

7.2 *When will we be able to test our premium and claims records?*

The new test environment will be available for industry-wide testing in October 2007.

7.3 *Can we test advance premium transactions?*

Yes; you can use the new test environment to test your November and December advance premiums transactions being held for processing in January.