



22 November 2017

**COST-SHARING PROPOSAL SUBMITTED BY
THE FEDERATION OF INTERNATIONAL CIVIL SERVANTS' ASSOCIATIONS (FICSA)
IN ACCORDANCE WITH THE RECOMMENDATIONS OF THE JOINT INSPECTION UNIT (JIU)
FOR CONSIDERATION BY THE HIGH LEVEL COMMITTEE ON MANAGEMENT (HLCM)**

Executive Summary

As far back as 1952, when the Federation of International Civil Servants' Associations (FICSA) was created, the former Consultative Committee on Administrative Questions (CCAQ) recognized the importance of staff representation. When it later expanded FICSA's role by granting greater opportunities for FICSA to present the views of staff in the inter-agency bodies of the common system, it affirmed the principle of full-time release from duties for the FICSA President and General Secretary.

The CCAQ decided in 1973 that local associations/unions should raise matters of general importance through FICSA, as it was deemed impossible to expect the individual staff associations/unions to represent staff at the common system level. To facilitate that process, the CCAQ reaffirmed in 1980 the paid full-time release of the FICSA President and General Secretary.

However, such release has always been at the discretion of the employing organizations. Consequently, situations have arisen in both the distant and recent past in which organizations have refused to grant paid release.

To address some of those refusals, the CCAQ established *ad hoc* cost-sharing arrangements under which the costs related to the salary and allowances of any FICSA officer in this position would be shared amongst the organizations having staff associations/unions affiliated to the Federation.

At that time, the CCAQ and former Administrative Committee on Coordination (ACC) had noted that although most of its committee members had favoured the establishment of cost-sharing arrangements, as opposed to the total cost being absorbed by the releasing organization, some did not see the need. In particular, some of the smaller organizations were of the view that they could not afford to grant paid release to staff from their organizations for this purpose. Nonetheless, the CCAQ's *ad hoc* cost-sharing arrangements have occasionally been applied.

More recently, however, even some of the larger organizations have begun to refuse requests for paid release, thus preventing their staff from serving as President or General Secretary of FICSA. The argument of these larger organizations is that they had already met their share of the costs by releasing other staff in the past for this purpose.

As a result, FICSA finds itself in a situation where fewer and fewer potential candidates can obtain the paid release from their respective organizations, leaving FICSA with an ever-decreasing pool of candidates, if any. In fact, due to this very reason, FICSA has recently had to get by without a General Secretary creating an immense void.

As such, it is clear that the ad hoc cost-sharing arrangements are no longer a solution to this growing problem.

Discussions on facilities for staff representation in general date back to at least 1982. More recently, FICSA submitted funding requests to sessions of the HR Network and the HLCM. In this respect, it should be pointed out that the HR Network, following its sessions held from 2002 through 2004, considered that the FICSA proposal and information presented were complete. FICSA recently submitted its request to the HLCM which subsequently created a working group to examine the matter.

It is important to note that in 2012 the Joint Inspection Unit (JIU), in its report entitled *Staff Management relations in the United Nations specialized agencies and common system*, document JIU/REP/2012/10, both recognized and addressed this problem.

The JIU wrote that “Despite the clear recognition of their role in the deliberations of the common system entities, the current practice of having only the employer organization of a SR [*staff representative*] representing a federation to pay entirely for his/her release time while other organizations concerned pay nothing is both unfair and inconsistent, as the federation represents the interests of all staff in its constituent organizations before the common system. Logic holds that if representational functions deserve to be compensated at the organization level – where enabling texts often exist, the same reasoning is fully applicable to staff representation at the common system level”.

Moreover, the JIU highlighted the built-in imbalances of representation, pointing out that the ICSC Secretariat has 48 staff members, whereas FICSA has only one full-time professional staff member (its Information Officer). The JIU report finds that “[*staff*] federations clearly have insufficient staffing capacity to thoroughly review and fully comprehend the full implications of all pertinent documentation, prepare submissions and technical papers, and participate in meetings that are often held back-to-back in diverse duty stations”.

When referring to unequal representation, and the number of representatives participating in each ICSC meeting, the JIU report informs that approximately 25 management representatives from the various common system organizations attend each ICSC meeting, whereas only two FICSA representatives are released full-time by their employing organizations.

The JIU report states that “Such imbalances need to be carefully reviewed and addressed”. The JIU adds that “It is inconsistent to have only some organizations paying for the full time release of SRs [*staff representatives*] who work for federations and thus represent the interests of staff in all organizations of the common system”.

Recommendation 8 of the JIU report reads that priority should be given to the development of a burden-sharing formula and agreement with regard to financing all costs associated with the representational function of officials of staff federations which are recognized in the ICSC statutes and rules of procedures.

Therefore, as a matter of expediency, FICSA respectfully requests HLCM's confirmation that it agrees with the principle as set out above by the JIU and that this JIU recommendation should therefore be implemented. This being the case, FICSA would accordingly request the HLCM to provide the relevant guidance to the organizations having staff associations/unions which are affiliated to FICSA.

It is important to note that this solution recommended by the JIU would not result in an increase in cost to the organizations which are already supporting the funding of the President and General Secretary positions on an individual basis. In fact, if implemented as suggested by FICSA at the July 2015 session of the HR Network, it would reduce the burden on any single organization as the total estimated cost of the positions of President and General Secretary would be distributed across all FICSA-member organizations based on the number of staff represented by FICSA in each participating organization. This would ensure, on the one hand, affordability on the part of the smaller organizations whilst, on the other hand, fair and predictable cost-sharing distribution.

FICSA and its activities

Recognizing the need for a federation of staff unions and associations to provide a unified and collective voice for UN common system staff, staff representatives created the Federation of International Civil Servants' Associations (FICSA) in 1952 as an inter-organizational body of the UN common system. FICSA was subsequently recognized by other inter-organizational bodies which make recommendations and decisions on the conditions of service of international civil servants. Those bodies include, but are not limited to, the United Nations General Assembly (UNGA) and its Fifth Committee, the International Civil Service Commission (ICSC), the former Administrative Committee on Coordination (ACC) which is now known as the Chief Executives Board for Coordination (CEB), the High Level Committee on Management (HLCM), formally the Consultative Committee on Administrative Questions (CCAQ) and the Human Resources Network (HR Network). Over thirty years later, the Coordinating Committee of International Staff Unions and Associations (CCISUA) was also created. Today, FICSA represents 29 staff associations/unions from organizations belonging to the United Nations common system, mainly the specialized agencies, and represents more than 30,000 staff.

Just as the executive heads submit a collective view to the Fifth Committee and the administrations submit a collective view to the ICSC through the HR Network, FICSA and CCISUA correspondingly present the unified view of staff to the UN's Fifth Committee, the ICSC, the HLCM, the HR Network and other inter-organizational bodies.

FICSA's activities, however, go far beyond staff representation in the above-listed bodies. With the ongoing reform of the common system, FICSA is being called upon to participate

in an ever-increasing number of meetings and working groups. In addition, although FICSA has always provided information, assistance and support to its members, the changes within the common system and staff concerns related thereto are creating an unprecedented number of requests. FICSA has also taken a leading, if not exclusive, role in providing training to staff representatives. Although priority is provided to FICSA members, our training activities are also open to members of the other two staff federations, CCISUA and UNISERV. Furthermore, FICSA provides technical assistance to Local Salary Survey Committees when requested.

In accordance with its Statutes, FICSA also promotes, amongst its membership, the exchange of information and views on all questions of common interest and the coordination of their activities.

The importance of effective staff-management relations is well appreciated in public service workplaces. The JIU wrote “that good and effective interaction between the management of the United Nations common system organizations under [the JIU] review and their staff, is critical for the delivery of high-performance services”.

FICSA officers and the issue of paid release

As with any inter-organizational body, FICSA has officers (an Executive Committee) to oversee and implement its activities and the decisions of its highest body, the FICSA Council, which is the general assembly of the Federation. The FICSA Executive Committee is comprised of seven elected officers who, in accordance with the Federation’s Statutes, must come from seven different member staff associations/unions. Only two of those officers (the President and General Secretary) are released on a full-time basis from their respective organization. As such, their salaries and allowances are paid by their releasing organizations while serving as these officers.

Document CCAQ/PER/R.126 dated 7 November 1979 reveals that the practice of the releasing organizations to continue paying the salaries and allowances of the Federation’s President and General Secretary originated some time before 1979, at which time FICSA submitted a request to the fifty-second session of the CCAQ for a formal arrangement whereby the costs of such full-time releases would “... be borne by all the organizations of the common system, rather than by individual organizations, as is the practice at present”.

During the latter CCAQ session it was stated that the current practice was lagging behind the evolution of the common system, that the role of FICSA had expanded considerably, that the administrative and financial consequences of release of the FICSA President and General Secretary, instead of falling upon one or two organizations, should be borne by the common system as a whole, and that the current practice was inhibiting the election of staff members from smaller organizations to run for these two FICSA officer positions. It had thus been decided that the CCAQ would subsequently need to reach agreement on a method of sharing the costs which an organization may incur as a result of releasing a staff member to serve in any of these two full-time officer positions.

At its fifty-second session in February-March 1980, the former ACC noted that “while larger organizations were sometimes able more easily to absorb the consequences of releasing elected staff representatives from their normal duties, this might not necessarily be the case in smaller organizations” and that “While most members favoured the establishment of ... cost-sharing arrangements, others did not see the need to do so. The Committee agreed that it would revert to the question of cost-sharing if and when a problem arose” on an ad hoc basis.

The ad hoc solution is no longer working

That was many years ago. Since then, the issue has arisen on numerous occasions. In some cases, the CCAQ agreed on ad hoc arrangements, it being understood that only those organizations whose staff were represented by FICSA would financially participate in the arrangement in an appropriate proportion.

However, in other cases, some staff representatives have been prevented from serving as President or General Secretary of the Federation. In fact, as mentioned above, the refusal by some organizations has left FICSA without a General Secretary on several occasions, sometimes for periods as long as two years. Consequently, this created hardship for the Federation which was forced to reduce its level of activities during those times. With no permanent resolution to this issue, the problem has only been amplified. It goes without saying that as a growing number of organizations are beginning to refuse to release staff on a full-time paid basis to serve as FICSA President and General Secretary, the right of staff to elect the FICSA officers of their choosing is being infringed upon. This could ultimately result in the silencing of an important staff representative body and the denial of its members to proper representation.

FICSA’s reduced operational budget, not including the salaries and allowances for the positions of President and General Secretary

From the end of the 1990s leading up to the year 2001, FICSA’s annual budget gradually increased to more than CHF 1 million.

However, just as the organizations began to come under pressure to reduce their budgets, FICSA was similarly pressed by its membership to decrease its budget as well. There was an increase in the use of temporary personnel (instead of staff) in some organizations, and as many FICSA member staff associations/unions do not allow for temporary personnel or consultants to be members, the amounts collected in contributions subsequently decreased. Since then, FICSA has made considerable efforts to reduce its budget and is pleased to inform that the current FICSA budget, for the year 2017, stands at approximately CHF 741,530. This amount includes staff costs for the FICSA secretariat, office rent at UNOG, travel costs related to FICSA representation in the various inter-agency bodies such as the Fifth Committee of the UN General Assembly, the UNJSPB, the HLCM, the HR Network, the ICSC (and its working groups and committees) and the IASMN, studies conducted by experts/consultants, training activities as well as IT services and equipment.

FICSA's budget also includes costs associated to the annual meeting of the FICSA Council which: 1) brings together all member associations/unions to discuss and formulate common positions on the common system issues related to employment and working conditions; 2) considers all matters referred to it by its Executive Committee; 3) defines the policy of the Federation and draws up the programme of work of the Executive Committee; 4) approves the admission of new members and can, when necessary, suspend members and/or their rights; 5) recommends specific actions; 6) adopts the Federation's annual budget, approves the scale of membership dues and approves the Federation's accounts; 7) elects the FICSA Executive Committee; and 8) appoints external auditors.

As with any organization, the largest share of the FICSA budget is allocated to the operational costs of its secretariat. This includes the salaries and allowances of one full-time information officer, one administrative assistant working at 80%, one half-time secretary, one half-time clerk and one accounting consultant (working 16 hours a month). The budget does not include the salaries of the FICSA President and General Secretary, which are covered by their respective releasing organization, and which vary according to the grades and steps of the incumbents.

Having reduced its operating costs to the bare bone, FICSA has no possibility of contributing to the salaries of the FICSA President and General Secretary, and without these two full-time elected positions FICSA cannot function properly, as already evidenced when some organizations refused to grant paid full-time release, and thus left the Federation without a General Secretary on several occasions.

Just as it would be inconceivable for the CEB or the ICSC to fulfil its mandate without a secretariat, the situation is no different for FICSA. It would be unrealistic to expect that only two full-time elected officers, supported by an Executive Committee of five additional elected members dispersed around the world and who normally have minimum or no release time, can alone be responsible for and address all the interests of over 32,000 staff. In fact, as pointed out by the JIU, the staff associations of the World Bank and the OECD employ seven and four full-time support staff respectively. The World Bank Staff Association represents somewhere between 7,000 and 10,000 as compared to the 30,000 staff represented by FICSA which has a significantly smaller secretariat.

Solution and recommendation from the Joint Inspection Unit (JIU)

The JIU, in its report on staff-management relations in the specialized agencies and common system (JIU/REP/2012/10), concluded that "It is inconsistent to have only some organizations paying for the full time release of SRs [*staff representatives*] who work for federations and thus represent the interests of staff in all organizations of the common system While there is certainly a need for a burden sharing formula for their full time release, the current practice should continue until such a new mechanism is in place".

The relevant recommendation of the above-referenced JIU report reads as follows:

“Recommendation 8

The legislative or Governing Bodies of the organizations under review should mandate their Executive Heads to prioritize the development of a burden-sharing formula and agreement with regard to financing all costs associated with the representational function of officials of staff federations that are recognized in the ICSC statutes and rules of procedures.”

In line with this JIU recommendation, FICSA hereby respectfully requests the HLCM, in coordination with FICSA, “to prioritize the development of a burden-sharing formula,” amongst organizations having staff associations/unions which are members of the Federation, to finance the two key FICSA officer positions (President and General Secretary). The relevant guidance is sought from the HLCM, following which the Federation will in turn advise its members as to the status of this important matter.

The HLCM may wish to consider applying the methodology used by FICSA in assessing membership dues as it is based on a weighted system in order to proportionally and fairly distribute the costs in accordance with the number of staff represented by FICSA in each member organization.

To ensure transparency, FICSA would suggest that once a cost-sharing formula is agreed upon, a corresponding fund be created and managed by the CEB secretariat.

Annex 1

Possible cost sharing formula to finance two FICSA officer positions (FICSA President and FICSA General Secretary)

Methodology for calculating membership contributions (dues)

The tables on the following two pages provide an example of what each member organization's share would be in financing the two full-time FICSA officer positions by applying FICSA's methodology of assessing membership dues which takes into account the number and category of staff (subsequently weighted) in each organization and distinguishes between staff at headquarters and local staff in field offices with low pay. It should be noted that, although the staffing figures provided by the CEB always reflect figures from the previous year, it is expected that the current numbers vary only slightly.

The total number of regular staff, as provided either by the CEB Personnel Statistics is divided according to category of staff and place of work, as follows:

(a) *Professionals and higher categories*

- i. Working in Headquarters in high-pay countries: **weight: 1**
- ii. Working in Headquarters in low-pay duty stations and in field duty stations: **weight: 0.9**

(b) *General Service staff*

- i. Working in Headquarters in high-pay countries and in high-pay field duty stations: **weight: 0.5**
- ii. Working in Headquarters in low-pay duty stations and in low-pay field duty stations: **weight: 0.01**

Member associations and unions are then assigned to bands according to their weighted number of staff, and each band is accorded a specified number of units of contribution. Therefore, the amount of each member's contribution is the product of the value of the unit of contribution and the number of units.

The tables on the following two pages are based on a scenario in which the FICSA officers occupying these two positions would both be at grade P-4, step 6 (one in Geneva and one in New York), amounting to a total annual cost of US \$ 341,860. It was necessary to prepare table 1 below, which distributes the total cost of the two full-time officer positions across all Full Member staff associations/unions, in order to be able to prepare table 2 below which demonstrates the distribution of the costs per Organization as some Organizations have more than one staff association/union.

A column has been added to both tables to demonstrate, on a percentage basis, the distribution of the total costs.

Table 1 (distributed per Member association/union)				
Scenario: Both FICSA Officers at grade P.4, step 6 (one in Geneva and one in New York)				
FICSA Cost Sharing for Two Officers				
(President and General Secretary)				
Member Association/Union	Weighted Staff	Units	Amounts in USD	Percentage of cost sharing
AP-in-FAO	1362.14	11	36,201	10.6%
FAO/WFP-UGSS	562	5	16,455	4.8%
IAEA	1860.1	11	36,201	10.6%
IARC	158.01	1.5	4,937	1.4%
ICAO	526.59	5	16,455	4.8%
IFAD	442.3	4	13,164	3.9%
ILO/ITC	115.5	1	3,291	1.0%
IMO	202.13	2	6,582	1.9%
IPU	32.5	0.325	1,070	0.3%
ITU	569.2	5	16,455	4.8%
OSCE	187.5	1.5	4,937	1.4%
PAHO/WHO	527.11	5	16,455	4.8%
SCBD	50	0.4	1,316	0.4%
UNAIDS	417.47	4	13,164	3.9%
UNESCO	1208.59	11	36,201	10.6%
UNFCCC	344.3	3	9,873	2.9%
UNGSC	142.5	1	3,291	1.0%
UNRWA/ASA	30	0.3	987	0.3%
UNWTO	69	0.6	1,975	0.6%
UPU	117.5	1	3,291	1.0%
WHO/AFRO	345.62	3	9,873	2.9%
WHO/EMRO	161.2	1.5	4,937	1.4%
WHO/EURO	275.14	2	6,582	1.9%
WHO/GSC	25.07	0.2507	825	0.2%
WHO/HQ	1387.15	11	36,201	10.6%
WHO/SEARO	111.96	1	3,291	1.0%
WHO/WPRO	159.05	1.5	4,937	1.4%
WIPO	881.2	8	26,328	7.7%
WMO	225.69	2	6,582	1.9%
Total			341,860	100.0%

NB. FICSA takes into account the fact that some UNESCO staff are represented by another staff federation. Therefore, UNESCO's share would be updated accordingly.

Table 2 (distributed per Organization)				
Scenario: Both FICSA Officers at grade P.4, step 6 (one in Geneva and one in New York)				
FICSA Cost Sharing for Two Officers				
(President and General Secretary)				
Organization	Member Association/Union	Amounts in USD	Amount per Organization	Percentage of cost sharing per Organization
FAO	AP-in-FAO	36,201		
	FAO/WFP-UGSS	16,455		
Total FAO			52,656	15.4%
IAEA	IAEA	36,201	36,201	10.6%
IARC	IARC	4,937	4,937	1.4%
ICAO	ICAO	16,455	16,455	4.8%
IFAD	IFAD	13,164	13,164	3.9%
ILO/ITC	ILO/ITC	3,291	3,291	1.0%
IMO	IMO	6,582	6,582	1.9%
IPU	IPU	1,070	1,070	0.3%
ITU	ITU	16,455	16,455	4.8%
OSCE	OSCE	4,937	4,937	1.4%
UN	SCBD	1,316		
	UNFCCC	9,873		
	UNGSC	3,291		
	UNRWA/ASA	987		
Total UN			15,467	4.6%
UNAIDS	UNAIDS	13,164	13,164	3.9%
UNESCO	UNESCO	36,201	36,201	10.6%
UNWTO	UNWTO	1,975	1,975	0.6%
UPU	UPU	3,291	3,291	1.0%
WHO	PAHO/WHO	16,455		
	WHO/AFRO	9,873		
	WHO/EMRO	4,937		
	WHO/EURO	6,582		
	WHO/GSC	825		
	WHO/HQ	36,201		
	WHO/SEARO	3,291		
	WHO/WPRO	4,937		
Total WHO			83,104	24.2%
WIPO	WIPO	26,328	26,328	7.7%
WMO	WMO	6,582	6,582	1.9%
Total		341,860	341,860	100.0%

NB. FICSA takes into account the fact that some UNESCO staff are represented by another staff federation. Therefore, UNESCO's share would be updated accordingly.

Annex 2

Discussion points from the HLCM and FICSA's Replies

The 30th session of the HLCM (held on 5 – 6 October 2015) expressed its appreciation of the value of engagement and representation of staff federations in the relevant inter-agency mechanisms, and formulated the following discussion points on the issue of cost sharing.

Discussion points from the HLCM

1. Identification of alternative funding approaches for elected officials' positions, including those based on membership fees;
2. Review of functions and composition of FICSA secretariat, and well as the possibility of providing its services from a low cost duty station;
3. Possibility of providing the services of the General Secretary from the same duty station where his/her organization may be based;
4. Consideration of a new representation structure where candidates for the positions of the President and General Secretary would be selected among the elected officials of FICSA member staff associations; and
5. Identification of solutions for all three Staff Federations for a more cost-efficient collaboration on coordination matters.

FICSA's replies to the points raised

1. Unlike the other UN system staff federations, FICSA has an applied methodology in place for assessing membership dues which fund the following: FICSA's Secretariat including staff costs and office rental; our travel-related expenditures to participate in the UN common system bodies (HLCM, HR Network, ICSC, UN General Assembly, UNJSPB, IASMN and working groups related to these bodies); our annual Council; research and policy analysis; and training activities. The role of the FICSA Secretariat is largely focused on coordinating the involvement of the membership in the various system-wide staff-management consultative bodies (including coordination with the other staff federations), with the understanding that this streamlines the consultative process and is conducive to effective and efficient staff-management relations. The level of the dues assessed to our membership is such that little, if any, room would be left for FICSA to also fund the positions of President and General Secretary. However, should the Administrations be willing to finance the costs associated to the FICSA Secretariat (mainly staff and rental costs), and travel-related costs to attend common system meetings, alternative approaches could be explored. Please note that FICSA's annual costs amount to approximately CHF 700,000, all of which is paid from the dues of our membership.

2. FICSA's Secretariat is hosted at UNOG in Geneva, and as such is co-located with the CEB Secretariat and the headquarters of a number of our member organizations such as ITU, UNAIDS, WHO, WIPO and WMO. Geneva is a practical location in that it is in close proximity to the headquarters of a number of our other member organizations in Europe (Austria, Denmark, France, Germany, Italy, Spain and the UK). In total, approximately 80% of the FICSA membership is located in Europe. Should there be the intention of moving the CEB Secretariat to a low cost duty station, we would be interested in being informed of such plans with a view to discussing possible continued co-location.

3. While FICSA's membership is global and the Federation coordinates much of its work by e-mail and video conference, it is also recognized by our membership that there is benefit to having a critical mass of capacity in our Geneva Secretariat office, with direct day-to-day oversight and guidance from the Executive Committee via the General Secretary who is responsible for managing the staff and the FICSA office. Having the General Secretary in the FICSA Secretariat headquarters in Geneva also provides accessibility, proximity and personal interactivity with the large majority of our membership. It is noted that the President and the other Executive Committee members (excluding the General Secretary) as well as FICSA's regional representatives are already based in their respective duty stations. This amounts to 90% of the FICSA officers who conduct their work for the Federation from their duty stations.

4. We understand that CCISUA's system allows for the positions of President and General Secretary to be selected among the elected officials of CCISUA member staff associations. However, in practice that can only apply when the elected official of a CCISUA member staff association already has paid full-time release, without which s/he cannot serve as CCISUA President or General Secretary. FICSA has always believed in the principle that staff should be allowed to choose their own representatives of the Federation and that competent and qualified staff representatives coming from smaller member organizations should also be allowed to serve as FICSA President and General Secretary. FICSA's elected officials are expected to serve the entire membership, independent of their respective organizations and staff associations. Effectively performing the Federation's core staff representative functions - both in system-wide bodies and vis-a-vis peer support and capacity building to the membership - is a full-time job for both the President and General Secretary. Based on FICSA's experience, it would not be practical to expect Presidents/General Secretaries/Chairs of member organization staff associations to perform their agency-level staff representative functions and also represent the diversity of staff issues at the UN system level.

5. During the past few years FICSA has been actively engaging in dialogue and cooperation with its sister federations, with a view to greater coordination and collaboration. While FICSA believes that we are stronger together, we have found that the burden of coordination typically falls on FICSA as we are the only staff federation with a dues structure that enables us to maintain core staffing for coordination. Based on FICSA's experience, effective and constructive long-term dialogue with UN system senior management requires us to be well-coordinated, with policy analysis capacity and institutional memory that goes beyond the term of any given Executive Committee. This is our goal vis-a-vis the composition of the Secretariat and Executive Committee, and we

would welcome the other staff federations joining us with such a common approach. We have been making steady steps on coordination and cooperation and hope that this increases in the future. This is a matter for the other federations to discuss within their respective memberships, including the practical implications for assessing and assigning dues for system-wide representation issues.

[end of document]