



# USAID | BELARUS

FROM THE AMERICAN PEOPLE

Amendment Issuance Date: May 20, 2020

Closing Date and Time for Full Application Closing: June 8, 2020 by 16:00 Kyiv Local Time

Subject: **NOTICE OF FUNDING OPPORTUNITY (NOFO)  
NUMBER: 72011320RFA00001**

Program Title: Innovation-Based Economic Development and Private Sector Growth in Belarus (INNOVATE) Activity

The purpose of Amendment No. 01 is to provide answers to the questions received to the Notice of Funding Opportunity Number: 72011320RFA00001.

Thank you for your interest in USAID projects.

Sincerely,  
/s/  
Daniel E. Harter  
Regional Agreement Officer

## QUESTIONS AND ANSWERS

- Q.1 In the course of studying the application submission requirements a question emerged regarding technical process of grant receiving. Will it be one time grant for one principal awarded applicant with subsequent transfer of sub-awards to pre-selected and approved local NGO's and the private sector? Or there will be various grants for several awarded applicant? Or there will be various grants for different entities listed in Implementation Plan from submission documents?
- A.1 Per the NOFO, USAID anticipates awarding one (1) Cooperative Agreement with a total estimated amount up to \$10,000,000 over a 5-year period. The proposed Program will dictate how many grants will be provided. All subawards (sub-grants/contracts) anticipated under this Program will be provided by the Recipient at the implementation stage. Please note, the USG regulatory and policy preference for the selection of subawardees is through a competitive process, but how a subawardee is selected is dependent on the Recipient's policies and procedures, and the circumstances.
- Q.2 Page 3 of the NOFO: The actual funding amount is "subject to availability of funds". In which cases could the funds not be available, fully or partly? Do such cases happen frequently?
- A.2 USAID can only obligate the funds that have been appropriated by U.S. Congress, approved and allowed to the Mission for the activity's specific purpose. USAID's standard practice is to provide the funds that it has been given for the year for program implementation and therefore obligates incrementally (upon funds availability). USAID makes every attempt to fully fund its activities/programs, however, sometimes factors beyond its control occur, impacting our ability to do so.
- Q.3 Page 12 of the NOFO: "At least 50% of the activity budget should be spent on partnering through sub-awards (sub-grant and sub-contracts) or other formats with multiple committed local NGOs and the private sector" Do private sector sub-contractors have to be local (Belarusian)? Example: Norwegian company... Do NGOs have to be local? Example XXX Tech registered in France.
- A.3 NOFO, Section I, page 3 states: "In line with USAID's New Partnerships Initiative, at least 50% of the activity budget should be spent on partnering through sub-awards or other formats with committed local NGOs and the private sector to help them build their capacity and implement their ecosystem development initiatives." Private sector sub awardees could be any localized organizations who will meet NPI and programmatic criteria and who will benefit the program.
- Q.4 page 13 of the NOFO: "The INNOVATE activity will be implemented in close collaboration with other Belarus private sector support activities, including the Facilitating Access to Venture Funding in Belarus (AIDVENTURE) activity, implemented by the Belbiz Group of Companies; and Delivering Regional Instruction Vital to Entrepreneurial Success (DRIVES), managed by PYXERA Global and the local IPM Business School." Are the organizations associated to existing USAID activities in the country (Belbiz, Pyxera, IPM) allowed to apply to INNOVATE? If so, how does USAID ensure equal chances for all applicants?
- A.4 This is New Activity. This is not a follow-on of existing programs. This full and open opportunity is equally open for any eligible organizations.

Q.5 Page 19/B of the NOFO: Registration as a Private Voluntary Organization (PVO). Does this concern only the applicant? Or any sub-contractor as well?

A.5 This applies to the NGOs seeking to apply to this opportunity that meet the definition of a Private Voluntary Organization (PVO) as defined in 22 CFR 203.

Q.6 Page 19/D of the NOFO: "Any one entity may submit one application for funding in response to this NOFO." Can a sub-contractor be involved in more than 1 application?

A.6 Yes, as stated in NOFO, on page 29: "Exclusivity arrangements with potential sub-partners are not required."

Q.7 Page 25 of the NOFO: "Discussion of the proposed coordination with other USAID activities, stakeholders and other donor activities. Applicants should provide specific examples of how they will capitalize on possible synergies with other implementing partners and other USAID activities in this area" Does the NOFO include all the information on potentially relevant USAID activities?

A.7 Please, refer to NOFO, SECTION I – PROGRAM DESCRIPTION Sub-section VII. Coordination with Other USAID Activities on p.13 of the NOFO.

Q.8 Page 31 of the NOFO: Cost Share is defined as "the resources a recipient contributes to the total cost of an agreement. It is the portion of project or program costs not borne by the Federal Government." Does this mean that the recipient itself (the applicant) is suggested to contribute? If so, can these contributions be in cash and/or other forms? (intellectual properties, some services provided for free, office space provided for the program...)

And/or, does this refer to contributions brought by other parties, e.g. the recipient plans to enrol a local government agency, or a private player, or an international government program, to co-fund with USAID any part of INNOVATE?

A.8 Please read Section IV.C.3. on p. 31. Cost Share "although not required for this NOFO, it is encouraged." However, if proposed, it is up to the Applicant which methodology to apply for the cost share. If cost share is proposed, it will be analyzed by USAID for applicability. It is up to USAID whether to accept any proposed cost-share.

Q.9 The section "Staffing and Management Plan" envisages that the we shall provide specific information on our staff and project team ("provide résumés for the candidates proposed for all Key Personnel positions").

XXX implements projects with the help of a dedicated project teams. The personnel is recruited only upon the signed commitment and starts working after national approval and registration of the project – no resumes are available at the application stage. XXX following its rules and regulations and the disclosure policy is not able to provide all required personal information. Can this requirement be waived? We can provide the team structure, the XXX Country Office structure, core duties and responsibilities, but not the personal data. Will that be acceptable?

Does this call allow for renovation/modernization works to be financed? For example, if we want to develop acceleration labs/co-working spaces at the universities and we will need to do some renovation and equip them to create such a lab/co-working space, will that be considered eligible?

Substantial Involvement – XXX rules and procedures will pose some limits on the applicability of this requirement. In particular, the following areas cannot be part of "substantial involvement":

Review and approval of key personnel; Approval of all subawards including extensions. Are these requirements negotiable at some point later?

- A.9 All Applications must be in compliance with the NOFO requirements. No exemptions will be considered. Proposed Key Personnel should be named including all information reflected in the NOFO. Non-key personnel are not required to be named but the Applicant must present a staffing and management plan per the NOFO requirements. As stated in the NOFO, PIOs may apply for funding under this NOFO. However, please note the type of award will be Cooperative Agreement, including Substantial Involvement and other requirements. Standard Provisions for PIOs will be based on ADS 308, including any other required special provisions necessary for program implementation. Does this call allow for renovation/modernization works to be financed? The PD and the NOFO do not envision support to renovation, restoration or construction initiatives.
- Q.10 Please explain in more detail the financial criteria and the status of the grant applicant. For example, what should be a authorized fund, turnover or assets, guarantees, etc. In your opinion can our Society be an applicant
- A.10 Eligible organizations interested in submitting an application **are encouraged** to read this NOFO thoroughly to understand the type of activity and requirements. Specifically please read:
- ✓ Section III, ELIGIBILITY INFORMATION
  - ✓ Section IV, 3. COST/BUSINESS APPLICATION FORMAT AND CONTENT, sub-sections:
    - D. RISK ASSESSMENT PRIOR TO ANY AWARD
    - E. DUN AND BRADSTREET UNIVERSAL NUMBERING SYSTEM (DUNS) NUMBER AND SYSTEM FOR AWARD MANAGEMENT (SAM)
    - F. FUNDING RESTRICTIONS
    - G. POTENTIAL REQUEST FOR ADDITIONAL DOCUMENTATION
- Q.11 Is there local coordinators in Minsk to help with our application?
- A.11 No. It is Applicant's responsibility to develop its Application in response to this NOFO.
- Q.12 Is there local assistance or contacts?
- A.12 No. It is Applicant's responsibility to develop its Application in response to this NOFO. This is Assistance mechanism. USAID anticipates awarding one (1) Cooperative Agreement.
- Q.13 Is the grant given to one entity or awarded to multiple applicants?
- A.13 The NOFO anticipates one Cooperative Agreement to be issued to one Implementing Partner (Prime Recipient), however IP/Prime Recipient may propose major sub-partners.
- Q.14 Is there need to find US partner for activity or USAID takes this role?
- A.14 It is up to the Applicant how to develop its Application. USAID's role is a donor role in this case.
- Q.15 Is having DUNS & SAMS #s a condition to submit our technical and financial application? Or required to receive an award, e.g., post-decision? Perhaps if the #s are not received by the deadline, we can submit screen shots of confirmations that all was done, to prove compliance, i.e., so we can submit and our proposal will be accepted?

- A.15 Please include your screenshot into the Cost Application to demonstrate evidence. SAM registration is a must prior to award for the Apparently Successful Applicant.
- Q.16 Herewith XXX, a law firm based in XXX, expresses its sincere interest in a new USAID Program...We thoroughly examined the NOFO to understand the type of activity sought... We would be glad to know from you how XXX may help on implementation of INNOVATE in Belarus.
- A.16 Through the NOFO, USAID is looking for a Recipient to implement the INNOVATE Activity. If your organization meets the criteria described in the NOFO, you may submit your Application to participate in the competitive process.
- Q.17 Pages 23 and 24 -Length of Executive summary: Executive Summary (not included in page limitations; should not exceed 2 pages). Page 24. ... however the executive summary should not exceed 3 pages. Page 23 Please clarify page limitation for the Executive Summary.
- A.17 USAID apologizes for the error. The Executive Summary should not exceed **2** pages and is not included in the page limitations.
- Q.18 Page 30, Budget Narrative provides detailed budget explanations and supporting justification of each proposed budget line item. It must briefly describe programmatic relevance and clearly identify the basis of estimate (i.e. how the budget number was determined fair and reasonable) for each cost element. Page 30 Is reference to organizational “personnel policy on file”, sufficient to serve as supporting justification for proposed salary of the Key and other categories of Personnel? In addition to letters of availability and commitment for key personnel, is it USAID/Belarus intention to not expect signed and dated documentation from key personnel: (i.e: Biographical Data Sheet (Form OMB-1420)?
- A.18 The Cost Application must include narrative descriptions/justifications for all proposed estimated costs including compensation. It is up to the Applicant how to justify the proposed compensation. Biographical Data Sheet is not required under assistance mechanisms, but may be provided as part of the narrative. At the negotiation stage with the Apparent Successful Applicant, USAID may request additional information, as needed.
- Q.19 Does USAID/Belarus foresee direct or indirect participation or involvement of GOB and or any entity within the government at the capital or at the level of oblasts?
- A.19 Please, refer to SECTION III - ELIGIBILITY INFORMATION (p. 18) for the types of entities eligible to apply for funding under this NOFO. INNOVATE activity is open for public-private dialogue and participation of GOB in activity events.
- Q.20 ...utilization of local professionals for country staff. Pages 26 and 27 Salaries for locally employed staff should correspond to the local market averages for similar positions. Applicants are expected to conduct their own market research for determining the salary scale for locally hired positions in Belarus. Page 32

Because of COVID-19 pandemic and ensuing travel restrictions, fielding of staff for in-country proposal support became difficult if not impossible. To level the playing field for eligible and interested organizations, will USAID/Belarus consider providing the US Embassy/Belarus local compensation plan or a similar document to facilitate preparation of a more accurate cost proposal?

- A.20 No. Please be advised that Applicants are expected to conduct their own market research for determining the salary scale for locally hired positions in Belarus.
- Q.21 Fringe benefits should be accounted in accordance with local labor law. P.31. Will USAID/Belarus provide an estimate or a customary (if any) F.B. rate for local compensation?
- A.21 Please check local legislation and practices for applicable fringe benefits. USAID/Belarus does not provide such estimates. Information on taxes is publicly available in Belarus, e.g. on the Government of Belarus webpages. This information is also available on the webpages of international auditing and consulting firms.
- Q.22 Branding and Marking: Is the Mission requesting that Branding/Marking plan be submitted with initial proposals, or will only the apparent selected applicant be asked to submit the plan at a later date?
- A.22 NOFO, page 47 states: “The Apparently Successful Applicant will be required to submit a branding strategy and marking plan for the Agreement Officer approval prior to award.”
- Q.23 Clarification of online tools: Page 16 of the NOFO states, “The implementer will also be encouraged to use online tools, both in activity management and program implementation, where required, feasible, and possible without any loss in the quality of assistance, in keeping up with global trends and developments, and optimizing activity costs.” Are there any specific online tools that USAID is referring to in this statement?
- A.23 No specific tools are recommended. It is up to the Applicant to select relevant approaches for using online tools for communication, management, and activity implementation.
- Q.24 Can USAID confirm, does the activity budget refer to total budget for INNOVATE or does it refer to non-management costs?
- A.24 USAID/Belarus will provide up to \$10,000,000, subject to the availability of funds, for the five-year activity. \$10M is the total budget including all estimations per SF-424.
- Q.25 The Applicant requests confirmation of an active bilateral agreement between USAID and the Government of Belarus.
- A.25 There is no active bilateral agreement between USAID and the Government of Belarus.
- Q.26 In the absence of a bilateral agreement, the Applicant respectfully requests confirmation that International NGOs implementing USAID-funded projects will be exempt from income tax, income tax on expats salaries, VAT, custom fees and duties and other such benefits that are normally granted under bilateral agreements.
- A.26 USAID/Belarus is not in a position to provide this confirmation. Please refer to relevant legislation on this matter.

The overview of International Technical Assistance program registration for entities registered in Belarus, including tax exemptions, is available on the webpage of the Ministry of Economy of Belarus: <https://www.economy.gov.by/en/itc-en/>

Q.27 In the absence of a bilateral agreement, the Applicant respectfully requests clarification regarding the mechanism for obtaining tax exemptions for international NGOs.

A.27 USAID/Belarus is not in a position to provide such clarification. Please refer to the relevant legislation on this matter.

The overview of the International Technical Assistance program registration for entities registered in Belarus, including tax exemptions, is available on the webpage of the Ministry of Economy of Belarus: <https://www.economy.gov.by/en/itc-en/>

Q.28 The Applicant respectfully requests clarification from USAID if individual grants awarded to local NGOs and private sector stakeholders will require approval by the Government of Belarus.

A.28 Please refer to the overview of the International Technical Assistance registration requirements on the webpage of the Ministry of Economy of Belarus: <https://www.economy.gov.by/en/itc-en/>

Q.29 Page 12, Section I.I, Implementing Principles, states: “At least 50% of the activity budget should be spent on partnering through sub-awards (sub-grant and sub-contracts) or other formats with multiple committed local NGOs and the private sector to help them build their capacity and implement their ecosystem development initiatives. Objective 1 of the activity is expected to help inform on and identify such potential sub-awardees.”

The Applicant respectfully requests confirmation from USAID that the expected 50% of budget to be spent with local organizations is inclusive of local partnering organizations (subawards or subcontracts) with whom the prime Applicant intends to co-implement the Activity, as well as proposed grants and contracts to local organizations, whose capacity the Activity will be building.

A.29 This amount is exclusive of local partnering organizations with whom the prime Applicant intends to co-implement the Activity. At least 50% of the budget spent on the sub-grants or sub-awards is the minimum required but applicants are welcome to further increase the share of the total budget going towards local entities including local co-implementers’ costs.

Q.30 Page 12, Section I.I, Implementing Principles, states: “At least 50% of the activity budget should be spent on partnering through sub-awards (sub-grant and sub-contracts) or other formats with multiple committed local NGOs and the private sector to help them build their capacity and implement their ecosystem development initiatives. Objective 1 of the activity is expected to help inform on and identify such potential sub-awardees.”

The Applicant respectfully requests confirmation from USAID that local organizations within the implementor’s consortium will be eligible to receive grants under this award.

A.30 Local organizations within the implementer’s consortium will not be eligible to receive sub-grants under this award. At least 50% of the budget spent on the sub-grants or sub-awards is the minimum required but applicants are welcome to further increase the share of the total budget going towards local entities including local co-implementers’ costs.

Q.31 Page 22, Section IV, C.1, General Application Format, states: “All materials and supporting documentation must be submitted in English.”

The Applicant respectfully requests confirmation that the audited financial statements used by local partners as the basis of their indirect rate can be provided to USAID in Belarusian or Russian.

A.31 For non-U.S organizations the audited financial statements may be provided in any language other than English. All other documentation must be submitted in English only.

Q.32 Page 30, Section IV, C.3, Cost/Business Application Format and Content, states: “Any proposed salary increase must be sufficiently justified and supported with the organization’s personnel policies (to be provided as annex to the cost application).”

The Applicant respectfully requests USAID confirmation that the organization’s personnel policies need not be submitted to USAID in instances where the organization has prior Federal implementation experience.

A.32 No. Any proposed salary increase must be sufficiently justified and supported with the organization’s personnel policies (to be provided as annex to the cost application).

Q.33 Page 32, Section IV, C.3, Cost/Business Application Format and Content, states: “Provide annual salary history for at least the three most recent years for all proposed key personnel.”

The Applicant respectfully requests confirmation from USAID that consistent with Agency-wide procurement reform, salaries should be based upon current market values and justification provided for each proposed rate rather than provide historical salary data.

A.33 It is up to the Applicant as to how to develop its Cost Application. Please note, at the negotiation stage, for cost realism and cost analysis purposes, USAID reserves the right to request any additional information related to the proposed estimations, including personnel compensations and annual salary history .

Q.34 Page 45, Section IV, C, Program Evaluation, states: “USAID/Belarus intends to conduct at least one evaluation of the INNOVATE Activity. A mid-term program performance evaluation will inform the Mission on overall activity progress towards higher-level outcomes as well as any necessary course-correction in the second half of activity implementation. The Mission may elect to conduct a final performance evaluation.”

The Offeror respectfully requests confirmation from USAID that the costs of these evaluations does not need to be accounted for by the applicant in its budget.

A.34 Confirmed.

Q.35 We are unable to understand one important feature of the proposed project design – Does the USAID expect that some portion of the project funds could be spent directly as grants for SMEs under component 3, or not? The project is supposed to facilitate the expansion of funding for innovative companies, including the one based on PPP principles. But does it mean that some portion of project proceeds could be channeled through grants to SMEs? If yes, would USAID expect some co-financing from local partners/ government budget? It is somewhat important. Allowing a considerable portion of project proceeds to be spent as grants would give the project much bigger leverage in the country.

A.35 USAID/Belarus expects to provide funding for developing infrastructure for the innovative economy. It's up to the Applicant to propose how best to utilize the activity budget. The specifics of assistance will be worked out in collaboration with USAID at the activity implementation stage.

Q.36 Section IV.C.2(g) requires offerors to “propose two key leadership positions which will be



designated as key personnel positions.” Later in the same section, USAID states that “Applicants may propose additional non-key personnel positions.” Earlier in the same section, the NOFO requests identification of “key personnel and long-term staff positions, including their technical and managerial roles and responsibilities and qualifications, experience in international technical assistance projects, and abilities of proposed key personnel relevant to successful implementation of the proposed technical approach.” Can applicants assume that for non-key personnel positions for which candidates are not proposed at the application stage, applicants can include technical managerial roles and responsibilities and propose required qualifications and experience levels, rather than describe the qualifications and experience of individuals for the non-key positions? If so, kindly revise Section IV.C.2(g) accordingly.

- A.36 USAID is not on the position to revise NOFO. Non-key personnel positions are not required to be named, however identification of positions and their roles for implementation are part of Applicant’s Cost Application and Technical Approach. Please see the requirements for the Applicant’s staffing and management plan.
- Q.37 In the introduction to Section I., USAID notes that “at least 50% of the activity budget should be spent on partnering through sub-awards or other formats with committed local NGOs and the private sector.” In section IV.C.2(g), USAID states that “local organizations and private sector firms receiving sub-awards or technical assistance from the project would be considered recipients, and therefore should not be included in the proposal.” Can USAID please clarify what “not included in the proposal” means in this context? Is USAID requesting that we not name potential sub-awardees, that we do not include them in our consortium, that we do not delineate their specific activities under INNOVATE, or another interpretation?
- A.37 Local organizations and private sector firms receiving sub-awards or technical assistance from the program will be identified at the implementation stage through a competitive process. This will be identified by the INNOVATE Recipient. At the Application stage, the Application should provide the Prime Applicant’s approach and proposed sub-partners (if any) with whom Prime Applicant plans to implement Activity/PD objectives, not sub-grants.
- Q.38 In Section IV.C.2(h), as part of the instructions for the CLA and MELP, USAID asks applicants to include “appropriateness and clarity of an implementation plan for efficient start-up and meeting objectives during the project period.” Since this information would typically already be included in the implementation plan per Section IV.C.2(f), would USAID consider removing it from the requirements for the CLA and MELP?
- A.38 No.
- Q.39 In Section IV.C.2(j), USAID requests past performance information for the applicant and any partnering organization, and then, later in the section, for the applicant and for the applicant and any *major* partnering organization. Can USAID please clarify if past performance information is requested for any partnering organization or just major partnering organizations, and define the criteria for what it considers a “major partnering organization” in this case? Also, can major partnering organizations be U.S.-based, international, or local?
- A.39 The NOFO does not provide a definition of a “major partner.” Whether an organization is a “major partner” should be based on the Applicant’s approach, relative roles and responsibilities, policies and procedures, and proposed costs. If the Prime Applicant submits an Application together with major partnering organization, then Past Performance and other information reflected in the NOFO should be submitted for both the applicant and any major partnering organization(s).

- Q.40 In Section IV.C.2(j), USAID asks applications to present annual amounts received for each of the contracts/grants that it features. If an applicant's contracts/grants are multi-year, is it sufficient to include the total amount received rather than annual amounts?
- A.40 No.
- Q.41 Section II.4 stipulates that, "The AOR will be substantially involved in approval of subawards and contracts, in accordance with 2 CFR 200.308 (c)(6)." Would a sub-award to a consortium partner ("major partnering organization") be considered approved when the award decision is made, or would it require further approval during implementation?
- A.41 The decision to approve a sub-award to a major partnering organization will be made by the Agreement Officer, in consultation with the relevant technical office, prior to award depending on the accuracy and sufficiency of the information provided by the Apparently Successful Applicant.
- Q.42 In Section IV.C.3(3), USAID asks applicants to "provide annual salary history for at least the three most recent years for all proposed key personnel." Can USAID confirm that bidders shall follow their established written policies and procedures in relation to personnel compensation as outlined by and in accordance with 2 CFR 200.430? Given that the current biodata form (AID 1420-17) does not include a requirement of three years of salary history, would USAID consider removing the requirement and allow applicants to follow their established written personnel policies and procedures?
- A.42 All USAID Recipients shall follow their established written policies and procedures in relation to personnel compensation as outlined by and in accordance with 2 CFR 200.430. Please note salary history is requested as part of the Budget Narrative to justify an Applicants' approach to the proposed salary rates/compensations.
- Q.43 Section VI.B.2.B of the NOFO indicates that the MELP will include a "Learning Section." Does this mean that the draft MELP should include a section that describes how the program will learn from monitoring and evaluation data and analysis, or are the requirements in that section specific to the implementation-stage MELP rather than the draft MELP that applicants are to include with their applications?
- A.43 Yes, the draft MELP should include a section that describes how the program will learn from monitoring and evaluation along with other NOFO requirements.
- Q.44 The latest uploads we see on the Development Experience Clearinghouse (DEC) for Belarus are from 2017. We would like to request that the quarterly or annual performance reports, workplans, and any other project deliverables deemed appropriate from Facilitating Access to Venture Funding in Belarus (AID-VENTURE), USAID Delivering Regional Instruction Vital to Entrepreneurial Success (DRIVES), Creating Sustainable Infrastructure to Support Startups and Small Business Development in the Regions of Belarus (CSISS), and any other relevant USAID/Belarus programming be uploaded to DEC to facilitate applicants' ability to describe a plan to coordinate with the initiatives listed above.
- A.44 All relevant reports from USAID activities have been added to the DEC. It includes information required by Standard Provision SUBMISSIONS TO THE DEVELOPMENT EXPERIENCE CLEARINGHOUSE AND PUBLICATIONS (JUNE 2012). USAID recommends searching relevant programmatic reports through an advanced search, using country name and IP name.

- Q.45 In Section IV.C.3, pg. 31 the NOFO states that “all the information required herein for the applicant” is also required from any partnering organizations. Does this language refer only to the cost breakdown information, or does USAID require all supporting documentation required from the applicant (e.g., from subsection D, a NICRA, evidence of fiscal responsibility, and statutory and regulation certifications, and from subsection E, DUNS and SAM registration) from all partnering organizations as well?
- A.45 Yes, per the NOFO, the same requirements are for major partnering organization(s) (*if proposed*).

[End of Amendment No. 01]