A seat belt use study for the Bedford fire department

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A proposed research project submitted to the Ohio Fire Executive Program

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## **CERTIFICATION STATEMENT**

I hereby certify that the following statements are true:

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### **ABSTRACT**

An issue that is poised to cause a physical, financial and legal pain to the Bedford fire department (BFD) is the less than 100% compliance to seat belt usage. Whether the staff is responding to an emergency call or attending to a detail that requires the fire department's response, the members of the fire department do not always use the restraints. This descriptive research project asked questions of personal use and attitudes surrounding the use of vehicle restraints. These included a) Are the BFD employees aware of the seat belt policy? b) To what extent does the Bedford fire department wear seat belts? c) What are the reasons our members chose not to wear a seatbelt? d) What could the BFD do to increase seat belt usage? Information was compiled with an anonymous survey as well as documenting incidents of non-compliance to the employer's policy for several weeks to answer most of these questions. A literature review outlined the great strides our federal department of transportation has made to change our civilian culture as it pertains to seat belt usage, and provided insight on how to effect change within the fire department. Sources such as the National Fire Protection Agency, National Highway Transportation Safety Agency, and the Ohio revised code bolstered the need for a behavioral change by the Bedford firefighters. The fire service has also moved towards this end with policies and pledges; however there still exists some perceptions that do not prioritize seat belt use as highly as it should. This is the case within the Bedford fire department as the results of an anonymous survey prove. If the fire service and specifically the BFD would follow the example set by the civilian movement, they both could be closer to the 100% compliance of seat belt use. There is equipment and technologies available to further augment a conscious effort to attain the goal of 100% compliance. These in addition to policy changes and training could make a difference.

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## INTRODUCTION

Statement of the Problem

The problem this study will address is the failure of firefighters to use seatbelts which exposes the Bedford fire department membership to a serious injury or death. Beyond the tragedy of this kind of injury is the catastrophic financial burden to the individual firefighter's family, the fire department as well as the municipality. The interruption of service due to the immediate loss of staffing also would have an impact on the city of Bedford. This applied research project was conducted with observations, notations, and reflections that yielded conclusions. These conclusions helped to form the author's recommendations.

One of the first priorities of the Bedford fire department is to arrive safely to the scene of an emergency, according to fire department rules and regulations (Nagy, Bedford Fire Department Rules and Regulations, 2013). Utilization of seatbelts have been proven to keep occupants of emergency vehicles from being ejected, thus reducing the chances of injury and death according to National Highway Traffic Safety Administration (NHTSA "Traffic safety facts" 2016). In total for the year of 2014 the NHTSA reported in the 2014 data that seatbelts saved 12,802 lives. In the previous year nine firefighters were killed in motor vehicle crashes, and the NFPA 2014 (Rita Fahy, 2014) report listed five of these as preventable due to the lack of seat belt usage. This startling statistic was not enough evidence to change the behavior of some firefighters to wear a safety belt when responding or returning from an emergency. A 2010 study done in Oklahoma revealed that 40% of firefighters did not wear a seatbelt when going to a structure fire (McNabbIn, 2010). In a NIOSH report released in 2013, (Research, 2013) a volunteer fire fighter was ejected from the right front seat and killed when the fire engine left the

road and crashed into trees. The summary of that incident included the lack of seat belt use as well as the lack of department S.O.P.s regarding seat belt use.

A survey was conducted for this research paper and the admitted problem is that most of the personnel do not use a seat belt in the rear of the ambulance and some do not use one in the back of the fire apparatus. In both settings multiple firefighters admit to not always using the vehicle restraints.

Purpose of the Study

The purpose of this descriptive research was to identify the reasons a Bedford firefighter may not use a seat belt and to recommend changes to the fire department policy so as to effect a change in the culture as it pertains to seat belt use. The research questions to be answered included:

- 1. Are the Bedford fire department employees aware of the seat belt policy?
- 2. To what extent does the Bedford fire department wear seat belts?
- 3. What are the reasons our members chose not to wear a seatbelt?
- 4. What could the Bedford fire department do to increase seat belt usage?

#### BACKGROUND AND SIGNIFICANCE

The Bedford fire department is a career fire department employing 29 members. Currently there are 3 shifts of 9 fire medics and 2 administration personnel. The department provides fire suppression, prevention as well as paramedic transport service. Operating out of 1 station, a single fire engine and 2 ambulances are in service daily with personnel cross staffing both the ambulances as well as the suppression vehicle. The department responded to 2409 incidents in 2014 including 36 structure fires and 1893 calls for emergency medical service (Nagy, 2014 Annual report, 2015). The shift work is split into three with each being designated as either "A" "B" or "C" shift. The staffing level can vary from 5 to 8 on duty per day due to vacation days, compensatory time off, or sick time use. The average age of the personnel is 43 years old and consists of 28 males and 1 female.

In the department's rules and regulations there were no provisions to not use a seatbelt (Nagy, Bedford Fire Department Rules and Regulations, 2013). The fire department's rules and regulations were published and available at any time to the membership. This policy was known to all the employees yet there was admitted and witnessed violations of policy which is jeopardizing the staff to injury and the employer to financial consequences. This author had observed Bedford firefighters not consistently using seatbelts while responding to an alarm (Appendix 1). This proved noncompliance from the rule of seat belt use. This was significant in the fact that firefighters were taking their safety for granted in a scenario that has proven to be a hazardous activity, and justified this study. There has not been a traffic accident resulting in injury with a BFD vehicle in the last 20 years, however as the total volume of runs increases the probability also increases.

Dr. B. Clark has been an outspoken advocate for changing the fire service culture on more than one type of firefighter behavior. His research on seat belt usage was worth noting here. In a recent article he states "If the fire service wants behavioral health to help ensure everyone goes home, somebody needs to look at spirit as a way to significantly reduce our occupational risks, injuries and deaths." (Clark, 2013) He was speaking to the attitude change that resulted in behavioral changes. Challenging the fire service traditional behaviors has been difficult to do. This particular behavior has been easily over looked as non- essential perhaps, due to the low percentage of the total amount of organizations that have suffered a casualty to this phenomenon.

In this effort to study the culture of the BFD, one of the survey questions pertained to the individual's personal safety behaviors. Question number eight: Putting on the SCBA after arrival to the scene would be an unacceptable delay for me and/or my supervisor. Agree or Disagree?

38 percent of the workforce believes speed over safety as it pertains to responding to an alarm.

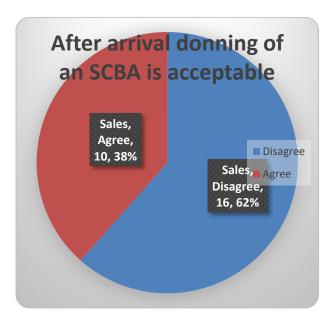


Figure 1. The culture of speed over safety

The future impact to the organization is not only financial should there be a tragic incident and seat belts were not used. If only one person were to be injured or killed when not using this simple preventive measure, the emotional and psychological costs would also be great. Surely an investigation would occur and other surrounding factors could costs the fire department a humbling experience on top of a tragedy. This research project could influence the leadership to make changes to policy and thus get the staff to 100% compliance to the rule.

The aging demographics will also play a factor in this project. If the newer generations coming into the BFD are taught from the beginning that seat belts are a priority, then the culture change will be cemented. The near future is vital to this recognition of risk mitigation.

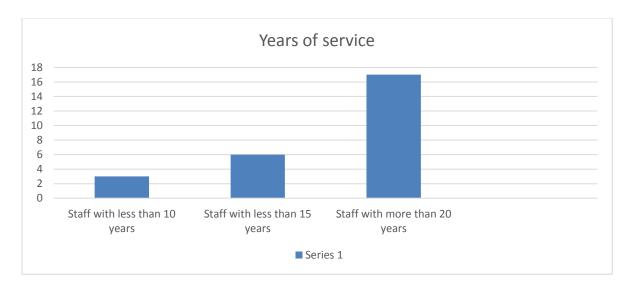


Figure 2. Years of service at the Bedford fire department

#### LITERATURE REVIEW

There is a substantial amount of data regarding seat belt usage from the NHTSA, the CDC as well as fire service related text. Review of the Ohio seatbelt law, and the department policy provided the basis to relate the research problem. (Nagy, Bedford Fire Department Rules and Regulations, 2013) The Ohio revised code 4513 exempts only postal and newspaper carriers from using a seat belt (R.C. 4513) In the State of Ohio, the BWC has devoted an entire chapter in its Ohio Administrative Codes (OAC) to Fire Fighting and has established safety requirements that each fire department is to follow. The OAC mentions in Chapter 4123: 1-21, Section 4 (5) (a) (b) that seat belts are to be provided and utilized by each apparatus occupant (R.C. 4513). The code also states that all employees are required to be seated and belted while the apparatus is in motion. In Ohio, if a firefighter is injured due to non-enforcement of the seat belt rule, he/she may file a Violation of Specific Safety Requirements (VSSR) with the BWC. (Ohio Bureau of workers compensation Rules, Statutes, Executive Orders and Public Hearings, 2016)

The Bedford fire department rules and regulations (Nagy, Bedford Fire Department Rules and Regulations, 2013) requires all personnel to be belted if driving or riding in any city vehicle. This is consistent with the NFPA (National Fire Protection Agency, 2012) 1901 recommendation which mandates the use of a seatbelt while any vehicle is in motion, even if donning breathing apparatus.

NHTSA.Gov report 45-12 (U.S. DEPARTMENT OF TRANSPORTATION National Highway Traffic Safety Administration, 2012) demonstrated the most recent seat belt usage data. 86% of those surveyed were buckling up. According to DOT HS 8112 246 (NHTSA's National Center for Statistics and Analysis, 2016) the trend towards increased usage of seat belts was related to the decline of passenger vehicle occupant fatalities. Even though there were more

traffic accidents from the previous years, there were more reports of only property damage with no personal injury.

The National culture change document published by FEMA (U.S. Fire Administration, 2015) listed the identified behaviors that keep firefighters from using seat belts on page 21. With these behaviors identified, each can be addressed with a policy, training or directive.

- The belief that the urgency of emergency response requires donning protective clothing and equipment en route.
- The belief that a fastened seat belt will delay the firefighter's ability to exit the vehicle upon arrival at the scene of the emergency.
- The difficulty of manipulating inadequately designed seat belts in the limited seating space that is available and in the presence of breathing apparatus straps.
- The sense of personal invincibility that comes from riding in a vehicle that is larger and heavier than most other vehicles on the road.
  - The fear of being viewed as nonconforming when others are not using their seat belts.
- The failure to enforce officially adopted policies creates the impression that compliance is not a high priority for managers and supervisors.

The NFPA has published a directive for all ambulance personnel to be restrained even if treating a patient in the back of the ambulance. These are technical solutions designed to address the cultural reasons firefighter/paramedics have for not using a seat belt in an ambulance.

Although NFPA 1917 (NFPA, 2013) does not address patient restraints on the cot, sections 6.21.3.2, 6.21.3.8 and 6.21.10 address ambulance personnel restraint and seatbelt warning systems in detail.

A previously published applied research project on seat belt use was used as a model to aid in compiling information. (Mims, 2011) "An Assessment of seat belt use by Tuscaloosa firefighters". In the study the author concluded that the obstacle keeping firefighters from buckling up was an attitude of arriving quickly and being ready to get to work at an emergency as soon as possible. This author concluded "Urgency should not justify unreasonable risk" and that "Enhanced enforcement is working for the public; it may work for the fire service as well." page 23. This statement of enforcement was backed up by her research and could be translated to the fire service by breaking with the past practice of only softly enforcing seatbelt usage.

In summary this review outlined the great strides our federal department of transportation has made to change our civilian culture as it pertains to seat belt usage, and thus provided insight on how to effect change within the fire department. The above sources bolstered the need for a behavioral change by the Bedford firefighters. If the fire service and specifically the BFD would follow the example set by the civilian movement, they both could be closer to the 100% compliance of seat belt use

## **PROCEDURES**

Using the descriptive research model, a literature review of department policy, professional journals, the Ohio revised code as well as articles and texts were compiled for an overview. Previously published research projects by the national fire academy were also studied via the World Wide Web for inspiration on the project. The writer studied the present situation and the surrounding attitudes of the Bedford firefighters with a recording of witnessed seat belt infractions as well as an anonymous survey (Appendix 1) (Appendix 2). Trends were identified in the results of tabulated data (Appendix 3).

The purpose of the survey was to gain insight on the personal attitudes on using seat belts and perhaps identify where and why the staff are not using seat belts 100% of the time. To provide anonymity on the answer sheet, only job descriptions and query numbers were used. An instrument of data collection was created by the author and was approved by Assistant Chief Shawn Solar. The Assistant Chief personally distributed the survey to each shift officer with instructions to have their entire shift members fill it out and return them in a sealed envelope to him the week of August 14th through the 21st. From the 29 employees of the Bedford Fire department, 26 self-surveys were returned. Six of the surveys were not completely filled in.

The author also documented witnessed examples where Bedford firefighters did not put on a seat belt until challenged to do so. These incidents where recorded from May 30th through July 29th.

Data from the survey was uploaded into a Microsoft excel spread sheet after identifiers such as handwriting and date of completion were removed.

## **Limitations of the Study**

It should be understood that even though the survey (Appendix 2) was designed to be as anonymous as possible, some reluctance remained to participate fully. The evidence for this declarative statement was the lack of completed surveys. Some of the questions could have been interpreted as an admission of guilt for not following department procedures, and the question "I have been serving the public as an emergency service person for \_\_\_\_\_\_ years" could have been interpreted as an identifier due to this smaller organization. Future studies should avoid or further clarify these details. It is important to note that a vehicle leaves the station several times per shift for reasons other than emergency calls. These incidents have not been tabulated for this study, however it is recognized that each time a vehicle is on the road there is a risk of being involved in a vehicle crash. Future studies should include an average of daily occurrences when a Bedford fire vehicle leaves the station for any reason.

The observations made by the author (Appendix 1) were done while he was assigned to the Engine as the officer. The time frame was somewhat limited in length and did not include two of the three shifts that operate at the fire department. A collective effort from all of the department officers could yield a bigger picture of the department's seat belt culture.

## **Definition of Terms**

Pumper driver - A person charged with the duties of driving the fire suppression vehicle and operating the pump at a fire.

DNA – Did Not Answer. A notation in appendix 3 that shows a question that was not answered.

Rear jump seat - A seated position on the fire suppression vehicle where a firefighter is seated behind the officer and pumper driver.

Auto aid alarm – An alarm of smoke/fire/explosion within the 4 cities that Bedford fire department has an agreement to respond on the initial alarm.

Automatic alarm – An alarm called into the Bedford fire department that is with in Bedford city limits usually via an alarm company. Automatic alarms do not get a multiple city alert.

## **RESULTS**

The results of researching this subject were that the members of the Bedford fire department were not using seatbelts in all cases even though all answered that there was a policy in place that demands 100% compliance of seat belt usage. The evidence is contained in the admitted answers of the survey and specifically answered the first research question. There was no one specific group within the department that was choosing to not buckle up. Some of the firefighters, paramedics, senior staff and company officers report to have not used a seat belt in at least some examples. The second research question was also answered via the survey as well as witnessed occurrences. The evidence supports the fact that Bedford firefighters are not wearing seat belts.

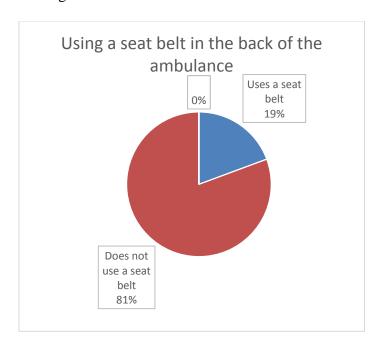


Figure 3. Seat belt use at the Bedford fire department

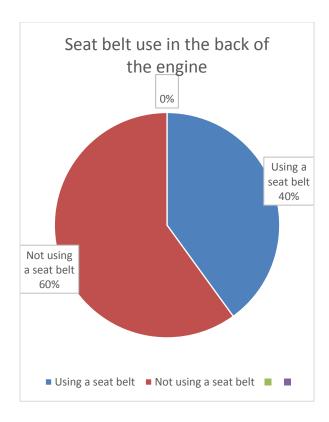


Figure 4. Seat belt use at the Bedford fire department

All of the 26 respondents acknowledged the presence of the policy but eight answered that they did not wear a belt while riding in the back of the engine, and 19 said they do not wear a seat belt while in the back of the ambulance. The prevailing attitude of who was responsible for their compliance to the policy was noted in question number nine of the survey which read, "It is only my responsibility to use the seat belt". Of the 26 respondents, 14 "disagreed" revealing a mindset that someone else had the responsibility to make them safer.

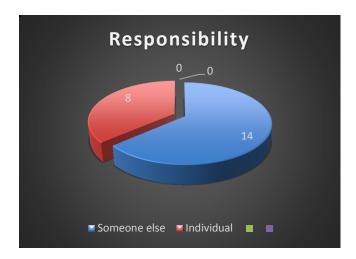


Figure 5. The perceived role of responsibility

In addition, question number eight detailed the associated attitude of speed over safety.

Of the 26 surveys returned, seven "agreed" that putting on the scba after arriving on the scene was an unacceptable delay for themselves or their supervisor and three chose not to answer at all.

The latter can only be recorded as neither "agree" nor "disagree". As a total for this question, only 16 of the 26 would prioritize the seatbelt over the breathing apparatus when responding.

The survey revealed that reasons for not wearing a belt 100% of the time is our traditional culture of taking a risk to satisfy a perceived need for speed and not prioritizing individual personal safety. This result specifically answered the third research question for the reasons why belts are not used.

The literature review reasoned that seat belts do save lives. The more difficult part of obtaining this goal of 100% usage has been the enforcement element. An anonymous questionnaire was used to collect admitted data regarding the personal use and attitude of seat belt use (Appendix 2). Further corroboration of the survey was a record of witnessed violations of the seat belt policy (Appendix 1). The answers from the questionnaire were rendered anonymous and aggregated into a spread sheet (Appendix 3).

As the background and significance section stated, the Bedford fire Chief has made the case for using a seat belt in any moving vehicle by establishing a policy that was clearly understood by all of the staff, which is evident by the 100% agreement of question number one. However, what also was clear was that the membership was not meeting the 100% compliance goal that the policy was intended to achieve. The enforcement element also was not specified in the policy (Nagy, Bedford Fire Department Rules and Regulations, 2013). There have been many examples of state governments adopting enhanced enforcement of seat belt laws which have proven to increase usage. A similar approach to emergency responders would have the same effect. It was the author's conclusion that this zero tolerance approach could work for the BFD and answer the fourth research question of, what could the BFD do to increase usage of seat belts.

Information gathered from the survey as well as documenting witnessed occurrences was encouraging. Every member of the Bedford fire department that participated in the survey acknowledged the rules in place to wear a seat belt. Their honesty in the rest of the survey was also encouraging. A few incomplete surveys showed some reluctance to admit policy violations but a positive discussion resulted. The discussion was the first step to changing the firefighter's behavior for the better. Should the department leadership choose this research could provide a starting point to reach 100 percent compliance to the goal of vehicle restraint use.

### DISCUSSION

Awareness of the policy has been established by the 100% agreement with question numbered one of the survey. Within the next few questions 81 percent admitted to not wearing the seat belt in the back of the ambulance and 30 present admitted to not using a seat belt in the back of the engine. If the members of the Bedford fire department knew there is a 100% usage policy in place but did not use the seat belt all of the time, one must ask why not? Further into the survey the author inquired to each person's interpretation of personal safety and responsibility. When asked if they were safer while riding in a fire engine, 61 percent agreed. This was a misconception that should be addressed in the future. Another data point worth considering was the answers given when asked "Who is responsible for each person to use a seat belt?" 57 percent answered that someone else was at least partly responsible. This neglect of personal responsibility has not been supported in the current policy and should also be addressed through a future policy review. The prevailing attitude of being ready for the fire was still evident in the answers of the questionnaire as well. When asked if a delay for putting on breathing apparatus was acceptable versus a seat belt, 62 percent disagreed which demonstrated the traditional scba over safety belt mindset. This can be addressed through training and discussion. The soft enforcement could literally be hurting the membership of the department.

### RECOMMENDATIONS

The current policy could be amended to make seat belt use a higher priority by explicitly listing its use as a policy rather than a line item under "Apparatus Respond and Returning". By doing so it would bring the discussion to the membership as a matter of fact and training. A stand-alone policy leaves no room for misinterpretation.

The administration could work with the labor union and implement the IAFF suggestions of having both the driver and company officer verbally confirm that all riders are belted before responding. This would also include a personal accountability component as the riders are required to verbalize their position and status of being belted.

Enhanced enforcement as cited in the literature review shows positive results for the public use of seat belts. It is reasonable to believe that a strict discipline procedure would do the same for firefighter/paramedics at the Bedford fire department. This culture change should start with an open dialog between management and the local union to reach an understanding that the past practice of a seat belt policy being only softly enforced is being phased out. This would accomplish the mission of prioritizing the effort as well as setting the rules from this point forward while avoiding any past practice grievance.

The culture of speed and efficiency must be weighed against personal safety as it pertains to the two second procedure of clicking the belt on. Training on how to put on the scba while seat belted will help to re-align the department's cultural needs as well as its strategic ones. The job must still be done efficiently but it must also be done safely.

The Bedford fire department is committed to a safe and aggressive work force by maintaining modern tools, equipment and PPE while also training the membership daily. It

should also revisit the seatbelt policy as the fastest way to mitigate a risk by adopting a zero tolerance for not using the seat belt.

Utilizing current technology would help to modify behaviors. Making the seat belt easier to use by adding extension cables to the female buckle would make it easier to make the connection while wearing the bulky PPE. Having the male end of the seat belts within reach would also support the effort. A simple hook to stow the buckle when not in use would satisfy this ergonomic problem. Currently the seat belt is ten to twelve inches behind the seat, and this makes it very difficult to reach once the firefighter has sat down. A green light dash board indicator light could be installed to make the front passenger and driver aware of a rear passenger not using their seat belt. This would be an answer for the collective responsibility mindset.

A rigorous training program could be rolled out to every member of the fire department which would include how to don an SCBA while seat belted. This could be the key towards changing the attitude of choosing speed over safety.

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# Appendix 1

Seat belt observation 2016

This document was assembled to illustrate the less than 100% compliance to the fire departments regulation to wearing a seat belt. The observations were done between May 27th and July 15th of 2016.

Date ---- Type of alarm --- Seat Assignment -- Statement of Firefighter "We were going to be here in 1 minute." 5/27 automatic alarm rear jump seat "I can't wear while doing patient care" 5/27 medical medic "I wanted to get my air pack on." 5/27 smoke in house rear jump seat "The air pack is locked in so I'm good." 6/2 auto aid alarm rear jump seat "unrealistic while treating a patient" 6/2 medical medic "Sorry, I will use it next time." 6/14 automatic alarm rear jump seat

# Appendix 2

Confidential survey regarding the use of seatbelts while on duty in

The Bedford fire department

There is no intent on identifying your participation in this survey. There is no right or wrong answer. This survey is an instrument to gather data on the reality of our department's use of seat belts at the Bedford fire department.

Directions – Check ALL that apply to you, and then add any additional comments at the bottom of the form. You may use the typewriter in the lieutenant's office if you wish to keep your handwriting out of the process.

My da	ily positions include:FirefighterPumper driverParamedic											
Shift Off	icerOther											
1.	The Bedford fire department has a seatbelt policyagreedisagree											
2.	I wear my seat belt in any moving city vehicleagreedisagree											
3.	I wear my seat belt in the cab of the ambulance 100% of the timeagree											
disagree												
4.	I wear my seat belt while working in the rear of the ambulanceagree											
disagree												
5.	I wear my seat belt while driving/riding in the front of the engineagree											
disagree												
6.	I wear my seat belt while in the rear of the engine 100% of the timeagree											
disagree												
7.	The height and weight of the engine makes us saferagreedisagree											

8.	Putting on the SCBA after arrival to the scene would be an unacceptable delay for
me and/or	my supervisoragreedisagree
9.	It is only my responsibility to use the seat beltagreedisagree
10.	I have been in a vehicle accident while riding in or driving an emergency vehicle
in my caree	eragreedisagree
11.	I have been serving the public as an emergency service person for years.
Any	y additional comments would be appreciated. Write in your comments or attach a
printed doc	rument.

# Appendix 3

	А	ВС	D	E	F	G	Н	I	J	K	L	M	N	0	Р	Q	R	S
1	Seat belt Q	uestionare results																
2																		
3	Daily Job	<u>#1</u>	<u>#2</u>	<u>#3</u>	#4	<u>#5</u>	<u>#6</u>	<u>#7</u>	#8	<u>#9</u>	<u>#10</u>		Addition	al comment	ts_			
4	FF/Medic	Α	A	Α	D	Α	D	D	D	D	D							
5	P.D./FF	Α	D	D	D	Α	D	D	Α	D	Α							
6	P.D./FF	Α	Α	Α	D	Α	D	D	DNA	D	Α							
7	FF/Medic	Α	DNA	D	D	DNA	D	D	DNA	Α	Α							
8	FF/Medic	Α	Α	Α	D	Α	Α	D	D	Α	Α		"Buckle u	p for safety	<b>/</b> "			
9	SHIFT OIC	Α	Α	Α	D	Α	DNA	DNA	D	Α	Α							
10	FF/Medic	Α	Α	Α	Α	Α	Α	D	D	Α	D							
11	FF/Medic	Α	Α	Α	Α	Α	Α	D	D	Α	Α							
12	FF/Medic	Α	Α	Α	D	Α	Α	Α	D	Α	D							
13	FF/Medic	Α	Α	Α	Α	Α	Α	Α	D	Α	D							
14	SHIFT OIC	Α	Α	Α	D	Α	Α	Α	D	D	Α							
15	FF/Medic	Α	Α	Α	Α	Α	Α	DNA	D	D	Α		"#9 - driv	er too"				
16	PD/FF	Α	Α	DNA	DNA	DNA	DNA	D	DNA	Α	DNA							
17	SHIFT OIC	Α	Α	Α	Α	Α	Α	Α	D	D	D							
18	FF/Medic	Α	Α	Α	Α	Α	Α	D	Α	D	Α							
19	FF/Medic	Α	Α	Α	D	Α	Α	D	D	D	Α							
20	FF/Medic	Α	Α	D	D	Α	Α	D	D	D	D							
21	PD/FF	Α	Α	Α	D	Α	Α	Α	D	Α	D							
22	FF/Medic	Α	A	Α	D	Α	D	D	Α	Α	D							
23	FF/Medic	Α	Α	Α	D	Α	Α	D	A	D	D							
24	FF/Medic	Α	Α	Α	D	Α	D	D	D	D	D							
25	SHIFT OIC	Α	Α	Α	D	Α	D	D	D	D	D							
26	PD/FF	Α	Α	Α	D	Α	D	Α	Α	D	D							
27	FF/MEDIC	Α	Α	Α	D	Α	Α	D	Α	Α	D							
28	PD/FF	Α	Α	Α	D	Α	Α	Α	D	Α	D							
29	SHIFT OIC	Α	Α	Α	D	Α	Α	DNA	Α	D	Α							
30																		