



February 3, 2020

Mark Adams, Procurement Analyst I
Port of San Diego
1400 Tidelines Avenue
National City, CA 91950

Regarding: **Bid Protest Deadline Extension** letter dated January 31, 2020
Specification No. 2019-15: Pavement Improvements at Shelter
Island Parking Lots, San Diego, California

Mr. Adams,

TC Construction Company, Inc. (TC) is protesting the Port of San Diego's (Port) decision to award this contract to MVC Enterprises, Inc. (MVC) bid was non-responsive for failing to achieve the 4% SBE goal and failing to submit a Good Faith Effort prior to the bid deadlines.

The Port has stated that MVC notified the Port (AFTER THE BID DEADLINES) that they were using "Supply Patriot Construction Materials", a SBE Supplier, to supply Slurry, Tools & Equipment in the amount of \$39,485.00, in order to achieve the 4% SBE goal. Has the Port seen an actual quote or proposal from Supply Patriot? Has the Port verified that Supply Patriot is performing a commercially useful purpose as a SBE regular dealer or are they simply a broker? The Contract Documents are clear that to be a regular dealer, the firm must engage in, as its principal business, and in its own name, the purchase, and sale of the products they are claiming to provide on this contract. Dealers are not regarded as regular dealers under the District's SBE Plan. If Supply Patriot is not a manufacturer of any of the products they are claiming to provide, they cannot be used toward obtaining the SBE goal.

Bidders were required to submit an electronic bid on January 14, 2020, @ 2:00 pm, then deliver the original documents to the Port's office by January 15, 2020, @ 4:00 pm. MVC's electronic and original bid package did not list any subcontractors on the "Subcontractor Listing Information" page 9 of the Bid Documents, claiming they were self-performing 100% of the work. Since MVC is not a SBE company, they were required to achieve the 4% SBE goal or submit a Good Faith Effort, they did neither.



The cover page of the bid package specifically states **“NOTE: BIDDERS ARE TO COMPLETE AND ATTACH THE DOCUMENTS CONTAINED IN THE BID PROPOSAL PACKAGE AS INSTRUCTED IN SECTION 2.0 OF THIS PACKAGE AND SUBMIT THE COMPLETED BID PROPOSAL PACKAGE IN ITS ENTIRETY ELECTRONICALLY PRIOR TO THE BID DEADLINE. BIDDER IS REQUIRED TO SUBMIT THE ORIGINAL BID PROPOSAL PACKAGE WITHIN THE TIME STATED ON THE CONTRACT DOCUMENTS COVER PAGE.”**

BID FORMS PAGE 3, SECTION 2.0 – Specifically states **“The following forms should be filled out and returned to the District in the Bid Proposal Package. A Copy of the required forms shall accompany the electronic bid; the original Bid Proposal Package must be submitted with the time stated on the Contract Documents cover page.”**

Form 11. Subparticipation Form*** was included in MVC’s bid package BLANK and listed only N/A (Non Applicable). MVC should have listed Supply Patriot, Inc. on this form as a material supplier in their bid package, **MVC DID NOT**. All Certified SBE’s either 1st Tier, 2nd Tier, _ Tier Subcontractors, Material Suppliers and Truckers needed to be listed on this form at Bid Time, **not afterwards**. The bottom of the form specifically states **“SUBMIT THIS FORM WITH THE ORIGINAL BID PROPOSAL PACKAGE (SEE CONTRACT DOCUMENTS COVER PAGE).”**

SECTION 01 13 00 Page 12 Item D.1. Specifically states **“All bidders will be provided a Sub-Participant Form in the Bid Package to fill in with their proposed SBE subcontractors, SBE material suppliers, and SBE truckers. This form shall be submitted with the original Bid Proposal Package.”** MVC DID NOT FILL IN THIS FORM. There is nothing in the technical specifications which allows for MVC, or any other bidder, to submit any change or additional information which is required to be furnished at the time bids are submitted, doing so is illegal and in direct violation of the California Subletting and Subcontracting Fair Practices Act.


SECTION 01 13 00 Page 13 Item 9. The sentence that **“The bidder SBE Participation information is required prior to the award of the Contract to the apparent low bidder”** has nothing to do with the **SUBMISSION** of the SUBPARTICIPATION FORM, this sentence only deals with verification of the information provided on the form. This sentence allows the Port to request back-up information, SBE status verification or obtain an actual copy of the SBE’s proposal or quote as verification. The Port should not simply rely upon a bidders verbal statement that they are utilizing an SBE company.

Lastly, on Tuesday January 21, 2020, I received an email from one of the subcontractors TC listed to perform a portion of the work, they stated that they had received an email from MVC requesting a quote claiming that they were awarded the job. They declined to provide MVC a quote after the fact. Allowing MVC to submit any information or make any changes after the bid deadlines provided MVC an unfair advantage to solicit quotes after the bid opening.

MVC failed to achieve the SBE goal at bid time, and they failed to submit documentation demonstrating that they made a good faith effort. Award of the contract is conditioned on meeting the requirements of the Equal Opportunity Contracting Requirements section. Based on the foregoing, TC respectfully requests that the Port deny MVC's unlawful and inappropriate attempt to change or alter their bid after the fact.

If you have any questions or require additional information please call me.

Sincerely,



Arthur Hernandez, Jr.
Senior Estimator/Project Manager.

cc: Matthew Earle, Director of Procurement/CPO Port of SD
Austin Cameron, President TC
Elan Schier, Chief Estimator TC
file



January 31, 2020

TO: ALL BIDDERS

Subject: **Bid Protest Deadline Extension**
 Specification No. 2019-15: Pavement Improvements at Shelter Island
 Parking Lots, San Diego, California

San Diego Unified District Staff had indicated on the eBid system for the subject Specification that the low bidder, MVC Enterprises Inc., was non responsive and therefore rejecting their Bid, due to a failure to meet the Equal Opportunity Contracting Requirements of SECTION 01 13 00 – SUPPLEMENTARY REQUIREMENTS of the technical specifications.

MVC Enterprises Inc. has since notified the District of an SBE supplier in excess of the 4% SBE goal prior to the award of the Contract as allowed by the technical specifications referenced above. Therefore, the District is accepting the Bid from MVC Enterprises Inc. and will recommend award of contract to said company at the Board of Port Commissioners Meeting on February 11, 2020. Any Bidder wishing to do so may attend the meeting, which begins at 1:00 PM at the District Administration Building, located at 3165 Pacific Hwy, San Diego, CA 92101.

The time for filing a Bid Protest as indicated in Spec. Section 4.2.3 has expired. However, **the District is extending the time allowed to submit a Bid Protest to Monday, February 3 at 5:00 PM.** If any Bidder decides to submit a Bid Protest, please do so by email to Matthew Earle, Director of Procurement/CPO, at mearle@portofsandiego.org and cc: myself at madams@portofsandiego.org by the date and time indicated above.

If you have any questions regarding this notice, please contact the undersigned at (619) 686-6247.

Sincerely,

/s/

Mark Adams
 Procurement Analyst I

By email

cc: Simon Kann
 Ernesto Medina
 Cid Tesoro
 Christopher McGrath
 Perla Goco
 William Melton
 Shirley Hirai
 Matthew Earle
 Angelica Leos
 Ryan L. Harris

TC CONSTRUCTION COMPANY, INC



**A copy of this package must be attached
to the electronic bid**

BID PROPOSAL PACKAGE

SPECIFICATION NO. 2019-15

PAVEMENT IMPROVEMENTS AT SHELTER ISLAND
PARKING LOTS
SAN DIEGO, CALIFORNIA

**BID DEADLINE:
January 14, 2020 BY 2:00 p.m.**

Business Name: Please Print Clearly
TC Construction Company, Inc.

Address: 10540 Prospect Ave Santee CA 92071

Authorized Rep. Austin Cameron, President

**NOTE: BIDDERS ARE TO COMPLETE AND ATTACH THE DOCUMENTS
CONTAINED IN THIS BID PROPOSAL PACKAGE AS INSTRUCTED IN
SECTION 2.0 OF THIS PACKAGE, AND SUBMIT THE COMPLETED BID
PROPOSAL PACKAGE IN ITS ENTIRETY ELECTRONICALLY PRIOR TO
THE BID DEADLINE. BIDDER IS REQUIRED TO SUBMIT THE ORIGINAL
BID PROPOSAL PACKAGE WITHIN THE TME STATED ON THE
CONTRACT DOCUMENTS COVER PAGE. (SEE INSTRUCTIONS TO
BIDDERS, SECTION 4, ARTICLE 4.1)**

SECTION 2.0 – BID FORMS

The following forms should be filled out and returned to the District in the Bid Proposal Package. A copy of the required forms shall accompany the electronic bid; the original Bid Proposal Package must be submitted within the time stated on the Contract Documents cover page.

1. Proposal
2. Contractor's License Information/Status
3. Noncollusion Affidavit*
4. **Bid Schedule****
5. **Subcontractor Listing Information****
6. Bidder's Statement of Experience
7. Questionnaire for Bidder's Statement of Experience
8. Bidder's Certificate of Worker's Compensation
9. False Claims Certification
10. Respondent's Certificate of Compliance with Americans with Disabilities Act
11. Subparticipant Form***
12. Bid Bond (Form supplied by Contractor's Surety)****

ASTERISK NOTES:

* Form must be subscribed and sworn to before Notary Public or other Officer.

** **These forms will be filled out electronically only.**

*** This form does not have to accompany the electronic bid. It will need to be submitted with the original Bid Proposal Package as stated on the Contract Documents cover page.

**** The signature of the Surety must be acknowledged by a Notary.

PLEASE NOTE:

These forms are designed to contain essential information concerning the Bidder and the bid, and must be legible. If any of the completed forms are illegible, the District, at its option may declare the entire bid unresponsive.

In the case of a discrepancy between the electronic bid and the original Bid Proposal Package, the electronic bid will be the accepted bid.

SUBPARTICIPATION FORM

Project Number:
Project Description

Submitted By: _____

Company Information (Please print)		Certified SBE (Yes/No)	Check Appropriate Category	Work Subcontracted	Total Contract \$ Amount	Percentage of Total Contract
Company			<input type="radio"/> 1 st Tier Subcontractor			
Contact			<input type="radio"/> 2 nd Tier Subcontractor			
Address			<input type="radio"/> ____ Tier Subcontractor			
City/State/ Zip			<input type="radio"/> Material Supplier		\$	%
Phone/Fax			<input type="radio"/> Trucker			
Email			To:			
Company			<input type="radio"/> 1 st Tier Subcontractor			
Contact			<input type="radio"/> 2 nd Tier Subcontractor			
Address			<input type="radio"/> ____ Tier Subcontractor			
City/State/ Zip			<input type="radio"/> Material Supplier		\$	%
Phone/Fax			<input type="radio"/> Trucker			
Email			To:			
Company			<input type="radio"/> 1 st Tier Subcontractor			
Contact			<input type="radio"/> 2 nd Tier Subcontractor			
Address			<input type="radio"/> ____ Tier Subcontractor			
City/State/ Zip			<input type="radio"/> Material Supplier		\$	%
Phone/Fax			<input type="radio"/> Trucker			
Email			To:			
Company			<input type="radio"/> 1 st Tier Subcontractor			
Contact			<input type="radio"/> 2 nd Tier Subcontractor			
Address			<input type="radio"/> ____ Tier Subcontractor			
City/State/ Zip			<input type="radio"/> Material Supplier		\$	%
Phone/Fax			<input type="radio"/> Trucker			
Email			To:			

PLEASE FILL IN ALL SUB CONTRACTORS AND THE PERCENTAGE (%) OF SUBCONTRACTED WORK
 SUBMIT THIS FORM WITH THE ORIGINAL BID PROPOSAL PACKAGE (SEE CONTRACT DOCUMENTS COVER PAGE)

4. Objects that sink to the bottom of the bay shall be periodically removed during the execution of the Contract. Any object, which in the opinion of the Engineer might constitute a nuisance or a dangerous obstruction to navigation or cause pollution to the bay water, shall be removed immediately. During the final inspections, the District may inspect the bay bottom in the vicinity of the work to assure complete cleanup and removal of all debris.
- B. Upon completion of Work, and prior to final acceptance, the Contractor shall remove from the vicinity of work and dispose of off Tidelands all surplus materials and equipment used by the operations and completes all the cleaning and removal of rubbish and debris.
- C. The Contractor shall submit documentation to demonstrate the disposal site for all materials, equipment and debris is in compliance with all federal, state, and local regulations.

1.10 WARRANTIES

- A. General.
 1. Refer to Article 5.3.6 "GUARANTEE" of the General Conditions for additional information.
 2. All Warranties including standard one-year warranty shall start at date of Final Completion of the Contract, or when work of an area is substantially completed, accepted and taken over for use by the District. Ensure that all warranties comply with this stipulation prior to submission of same.
 3. The District shall give prompt notice in writing to the Contractor of any defects noted during the warranty periods(s) promptly requesting Contractor to remedy such defects.
 4. During the month prior to the end of the standard one-year warranty period, the District's Engineer or its representative and the Contractor, shall conduct an inspection of the project, the Contractor shall promptly remedy any defects due to faulty materials or workmanship.
 5. At the expiration of the standard one-year warranty period the Contractor shall formally submit to the District all extended warranties, if any, given by Subcontractors for their work on the project and such Subcontractors for their work on the project and such Subcontractors shall be formally advised of the assignment.

1.11 EQUAL OPPORTUNITY CONTRACTING REQUIREMENTS

This project is subject to the San Diego Unified Port District's Small Business Enterprise (SBE) Plan, approved by the Board of Port Commissioners on April 22, 2003 and on file in the offices of the District Clerk.

- A. Policy Statement
 1. It is the policy of the San Diego Unified Port District (District) that all businesses be provided equal opportunity to participate in the performance of District contracting and leasing opportunities; and to ensure that workers on public works projects of one thousand dollars (\$1,000) or more are paid the general prevailing rate of per diem wages for regular, holiday, and overtime work as provided by California Labor Code Section 1771.
 2. The District is committed to take all necessary and reasonable steps to increase its utilization of small businesses for a positive economic impact to the region. District policy prohibits discrimination against any person because of age (over 40), ancestry, color, disability (mental

and physical), gender (including identity, appearance, or behavior, whether or not that identity, appearance, or behavior is different from that traditionally associated with the person's sex at birth), marital status, medical condition, military status, national origin, pregnancy, race, religion, sexual orientation, genetic information, or veteran status, in the award or performance of District contracts or leases.

3. The District will create a level playing field on which small businesses can compete fairly for District contracts. This policy will help remove barriers to the participation of small businesses in District contracts and assist in the development of firms to compete successfully in the marketplace outside the District's Equal Opportunity Contracting Program.

B. Americans with Disabilities Act (ADA) Policy

1. The San Diego Unified Port District (District) does not discriminate on the basis of disability in employment and complies with the ADA, and all other applicable federal, state, and local laws, regarding barrier-free access to all District services, programs, and activities.
2. In conjunction with BPC Policy No. 361, it is the District's policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment.
3. An individual with a disability, who can be reasonably accommodated for a job, without undue hardship to the District, will be given the same consideration for that position as any other applicant. Additionally, the District will engage in an interactive process to attempt to reasonably accommodate qualified individuals with disabilities, so they can perform the essential functions of a job. All employees are required to comply with safety standards.
4. The District is committed to ensure all services, programs, and activities are accessible and usable by all individuals except where to do so would result in a fundamental alteration in the nature of the service, program, or activity, or in undue financial and administrative burdens.
5. To ensure high visibility, the District will participate in community outreach events, report on activities that further enhance accessibility, and consider the use of Universal Design, which is the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design, to support and include people with disabilities in all services, programs, and activities as appropriate.
6. In conjunction with BPC Policy No. 361, the District will promptly investigate all complaints of employment discrimination and barriers to services, programs, and activities, and when appropriate, take effective remedial action to address and remedy any complaints.
7. The Executive Director will designate person(s) responsible for developing and implementing the District's ADA program and ensuring that District employees, agents, lessees, and Contractor's adhere to the provisions of the ADA program. The ADA program will be implemented at the same priority as compliance with all other legal obligations incurred by the District.

C. Small Business Enterprise Program

1. The District's Small Business Enterprise Program utilizes external resources in their search for small businesses to participate on contract opportunities. The information is maintained and updated by those sources and their registered clients. Businesses that are registered within these data sources claim they meet the federal or state size standards to qualify as a small business.

2. Please be aware that the District's Small Business Enterprise Program does not control or guarantee the accuracy, or completeness of this outside information. Questions regarding a small business size protest should be addressed with the outside source.
3. The resources that are used to search for available certified small businesses are:
 - a. State of California Department of Transportation (CALTRANS)
 - b. System for Award Management (SAM)
 - c. California Department of General Services (DGS)

D. Small Business Enterprise (SBE) Goal:

1. The bidder shall make good faith efforts, as defined in the District's SBE Plan, to subcontract **4 percent** of the dollar value of the prime Contract to small business (SBE) concerns. In the event that the bidder for this solicitation qualifies as an SBE, the Contract goal shall be deemed to have been met. **All bidders will be provided a Sub-Participant Form in the Bid Package to fill in with their proposed SBE subcontractors, SBE material suppliers, and SBE truckers. This form shall be submitted with the original Bid Proposal Package.** This requirement in no way relieves the Contractor of the requirements of California State Law to list required subcontractors at the time of bidding on the Subcontractor Listing Information Form.
2. Bidders should be fully informed regarding the requirements of the District's Small Business Enterprise Plan. Particular attention is directed to the following matters:
 - a. SBE eligibility is based on economic size standards determined by number of employees or gross receipts. The SBE Plan recognizes both federal and state size standards.
 - b. An SBE qualifies as such by any of the following methods:
 - i. Being certified **prior to bid opening** as a Disadvantage Business Enterprise (DBE) by the State of California Department of Transportation (CALTRANS).
 - ii. Being certified **prior to bid opening** by the U.S. Small Business Administration and registered as such in the System for Award Management (SAM) database.
 - iii. Being certified prior to bid opening by the California Department of General Services (DGS) Small Business database.
3. An SBE may participate as a prime contractor, subcontractor, or a joint venture with a prime or subcontractor, or as a vendor of materials or supplies or provider of trucking services. An SBE that is a party of a joint venture must be responsible for a clearly defined position of the work to be performed, in addition to satisfying requirements for ownership and control. The SBE joint venture must submit District Form No. 163.
4. An SBE must perform a commercially useful function (i.e., must be responsible for the execution of a distinct element of the work; and must carry its responsibility by actually performing, managing, or supervising the work).
5. The District and the bidder will count toward the SBE goal **100 percent** of expenditures for materials and supplies required under a Contract and obtained from an SBE regular dealer. A regular dealer is a firm that owns, operates, or maintains a store, warehouse, or other establishment in which the materials or supplies required for the performance of the Contract are brought, kept in stock, and regularly sold to the public in the usual course of business.

To be a regular dealer, the firm must engage in, as its principal business, and in its own name, the purchase, and sale of the products in question. Brokers and packagers will not be regarded as regular dealers under the District's SBE Plan.

6. The District and its bidders will count toward the SBE goal **100 percent** of such expenditures obtained from an SBE manufacturer.

A manufacturer is a firm that operates or maintains a factory or establishment that produces on the premises the materials or supplies obtained by a contractor. Brokers or packagers will not be regarded as manufacturers.

7. Credit for trucking by SBEs may be credited toward goal achievement if the fees charged for the services required on the job site when the hauler, trucker, or delivery service is not also the manufacturer of or a regular dealer in the materials and supplies. Credit for trucking will be the amount paid to the truckers.

Before credit is allowed toward the SBE goal, an SBE must be certified by the date bids for the project is opened.

8. All bidders, including the apparent low bidder, are required to submit the following information concerning and SBE; (1) the name and address of each SBE; (2) a description of the work to be performed by each named firm; and, (3) the dollar value of the work of the subcontract. If the apparent low bidder fails to achieve the Contract SBE goal stated herein, bidder is required to submit supporting documentation demonstrating that it made good faith efforts in attempting to do so. Award of the contract will be conditioned on meeting the requirements of the Equal Opportunity Contracting Requirements section.
9. **The bidder SBE participation information is required prior to the award of the Contract to the apparent low bidder;** provided however, nothing herein is intended to allow any change or addition to the information regarding subcontractors, which is required to be furnished **at the time bids are submitted** pursuant to the California Subletting and Subcontracting Fair Practices Act.
10. If the Contract goal specified in the solicitation is not met, the apparent low bidder shall submit information and documentation of the actions taken to actively and aggressively achieve the SBE goal. **If the apparent low bidder fails to meet the SBE goal, such information and documentation regarding their good faith efforts shall be delivered to the District with the original Bid Proposal Package.** The District will then determine whether a good faith effort was made in compliance with the following requirements:
 - a. Whether the bidder accomplished one of the following below (i, ii, or iii), documentation shall include verification of pre-bid attendance or verification of advertisement, and/or verification of contact with community organizations such as telephone records, fax or email transmittal. Good faith efforts must be specific to each contract opportunity.
 - i. Attended any pre-solicitation or pre-bid meetings that were scheduled by the recipient to inform contractors of contracting and subcontracting opportunities,
 - ii. Advertised in general circulation, trade association, and minority-focused media concerning the subcontracting opportunities,
 - iii. Effectively used the services of available community organizations; contractors' groups, local, state, and federal business assistance offices; and other organizations that provide assistance in the recruitment and placement of small businesses.

- b. Whether the bidder accomplished one of the following below (i, ii, iii or iv), documentation shall include verification of any of the above actions such as listed areas of subcontracted work along with verification of telephone records, fax or email transmittal and other confirming documents. Good faith efforts must be specific to each contract opportunity.
 - i. Selected portions of the work to be performed by subcontractors in order to increase the likelihood of meeting the SBE goal (including, where appropriate, breaking down contracts into economically feasible units to facilitate subcontractor participation),
 - ii. Provided interested businesses with adequate information about the plans, specifications, and requirements of the contract,
 - iii. Made efforts to assist interested businesses in obtaining bonding, lines of credit, or insurance required by the District or contractor; and,
 - iv. Made efforts in establishing delivery schedules, where the requirement permits, which encourage participation by small businesses.
 - c. Whether the bidder provided written notice to at least three (3) businesses in each subcontracted portion of work, or can demonstrate that none exist, and that their interest in the Contract was solicited within five (5) days of the contract advertisement to allow the businesses to participate effectively.
 - d. Whether the bidder followed up on initial solicitations of interest prior to three (3) days before bid opening by contacting businesses to determine with certainty whether the SBEs were interested.
 - e. Whether the bidder negotiated in good faith with interested businesses, not rejecting businesses as unqualified without sound reasons based on a thorough investigation of their capabilities.
11. The following applies to good faith efforts determinations:
- a. Good faith efforts are those that could reasonably be expected to result in goal attainment by a bidder who aggressively and actively seeks to obtain SBE participation. The previous list of efforts (a through e) are required by the District for compliance to demonstrate that a good faith effort to attain the SBE participation goal was conducted. It does not represent an exhaustive checklist since other factors or efforts may be relevant in appropriate instances. The District will make a determination of compliance by confirming that bidder conducted steps a through e above.
 - b. The San Diego Unified Port District requires prime contractors to make good faith efforts to replace an SBE that is unable to perform the Contract successfully with another SBE. The District must approve substitutions of SBE during Contract performance. In these instances, the District reviews good faith efforts made to replace SBEs with another SBE and verifies the eligibility of the substitute firm.
 - c. The San Diego Unified Port District SBE Information is provided for you on our website, www.portofsandiego.org. Click on; "Business Tab", which takes you to the "Doing Business" page. The "Doing Business" page contains websites that will provide you with small business sub-participants to contact in your good faith efforts for sub-contracting opportunities on specific work categories pertaining to this project, a list of Outreach Organizations and Good Faith Effort Documentation forms. If you do not have access to the Internet, please contact Equal Opportunity Contracting at (619) 686-7245.

E. Equal Employment Opportunity Program Information

1. As prescribed under BPC Policy No. 358, the District requires all service providers, vendor, contractors and lessees to comply with all applicable Federal, State, and local law or regulation relating to equal employment opportunity and nondiscrimination, including any such law, regulation, and policy hereinafter enacted for the promotion of equal employment opportunities and nondiscrimination.
2. Questions regarding Americans with Disabilities Act Requirements, and, Equal Opportunity Program Requirements of this opportunity should be directed to:

Shirley Hirai, Manager, Equal Opportunity
Human Resources
Phone: (619) 686-7245, Fax: (619) 686-6408
E-mail: shirai@portofsandiego.org

PART 2 - PRODUCTS (NOT USED)

PART 3 - EXECUTION (NOT USED)

END OF SECTION