

Citizen Participation and Public Petitions Committee

14th Meeting, 2023 (Session 6), Wednesday
4 October 2023

PE1984: Introduce the C100 form for child arrangement orders in Scotland

Lodged on 28 November 2022

Petitioner Amy Stevenson

**Petition
summary** Calling on the Scottish Parliament to urge the Scottish Government to reduce the financial barriers that prevent parents from having contact with their children by introducing a Scottish equivalent to the C100 form, with a fixed fee, for making applications for child residence or child contact orders.

Webpage <https://petitions.parliament.scot/petitions/PE1984>

Introduction

1. The Committee last considered this petition at its meeting on [22 February 2023](#). At that meeting, the Committee agreed to write to the Scottish Government, the Law Society of Scotland, the Family Law Association, Relationships Scotland, the Scottish Legal Aid Board, the Scottish Courts and Tribunals Service, and the Family Law Committee of the Scottish Civil Justice Council.
2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
3. The Committee has received new responses from the Scottish Courts and Tribunals Service, the Scottish Government, the Scottish Civil Justice Council, Relationships Scotland, the Scottish Legal Aid Board, and the Law Society of Scotland, which are set out in **Annexe C**.
4. Written submissions received prior to the Committee's last consideration can be found on the [petition's webpage](#).

5. Further background information about this petition can be found in the [SPICe briefing](#) for this petition.
6. The Scottish Government's initial position on this petition can be found on the [petition's webpage](#).
7. Every petition collects signatures while it remains under consideration. At the time of writing, 144 signatures have been received on this petition.

Action

The Committee is invited to consider what action it wishes to take.

Clerk to the Committee

Annexe A

PE1984: Introduce the C100 form for child arrangement orders in Scotland

Petitioner

Amy Stevenson

Date lodged

28 November 2022

Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to reduce the financial barriers that prevent parents from having contact with their children by introducing a Scottish equivalent to the C100 form, with a fixed fee, for making applications for child residence or child contact orders.

Previous action

I have had a face-to-face meeting with Claire Baker MSP. I have also had a meeting with Cllr David Graham.

My previous petition about providing legal aid for parents PE1917 also had support from Relationship Scotland and Shared Parenting Scotland, who all support the fact that financial barriers are having an impact on a child being able to see both of their parents after they break up.

Background information

The C100 form, available in England and Wales, asks for a family court to make a judgement, under Section 8 of the Children's Act 1989, on the parenting arrangements. Having a similar provision in Scotland would support quick resolutions on the contact arrangements for a child and would reduce financial barriers coming in between a child seeing both parents.

I previously submitted a petition to get the Legal Aid Bill changed to include parental responsibilities, but I am aware this would have an impact on the budgets. Having a C100 form in Scotland would still mean that people pay for the service but it wouldn't financially cripple people to the point where they give up and don't get to see or have a relationship with their child/children. It would also cut out the middle-man, saving time and money and supporting the children's needs.

There are too many children growing up without having the love from both parents and we should try to make the process of child contact a little more bearable for the alienated parent.

Annexe B

Extract from Official Report of last consideration of PE1984 on 22 February 2023

The Deputy Convener: Our next new petition is PE1984, on introducing the C100 form for child arrangement orders in Scotland, which has been lodged by Amy Stevenson.

The petition calls on the Scottish Parliament to urge the Scottish Government to reduce the financial barriers that prevent parents from having contact with their children by introducing a Scottish equivalent to the C100 form, with a fixed fee for making applications for child residence or child contact orders.

Members may recall that we previously considered a petition from Amy Stevenson, which focused on the provision of legal aid to parents fighting for access to their children. Amy has followed up on that petition with this call for the introduction of a form similar to the C100 form used in England and Wales when applying to the court for a child arrangement order. Amy suggests that introducing a similar form in Scotland, along with a fixed fee for submitting it, would help to reduce the financial burden on parents seeking child residence or contact orders.

In responding to the petition, the Scottish Government set out the current process for applications to the court for child residence and contact orders, and the fees associated with that.

While accepting that the current procedures for lodging writs and defences in Scotland are viewed as difficult to understand, the Scottish Government highlights a range of issues that it would require to consider before moving to a forms-based system, including criticisms that the C100 form is too lengthy and can be difficult for vulnerable applicants to complete without assistance; the fact that the form may not capture all the relevant issues for the court to consider; and concerns that a forms-based approach may not be focused on the best interests of the child. It is also noted that a forms-based process may reduce costs at the initial application stage but would not rule out the need for applicants to access legal advice at other stages of the process.

The committee has also received submissions from Shared Parenting Scotland and Claire Baker MSP, copies of which are included in our meeting papers. I briefly highlight that Shared Parenting Scotland has suggested that the introduction of a C100 form, or something similar, would remove some barriers for parents who are trying to restore or establish a schedule of contact with their children, but that wider improvements are necessary to provide support to parents in those circumstances.

Do members have any suggestions or comments?

Alexander Stewart: This is a very important issue. We have heard about some areas in the submissions that we have already received, but we need to get more information. We should write to the Scottish Government highlighting the online systems that have been introduced in Australia and in the Netherlands and seek information on what considerations have been given to developing a similar service in Scotland for parents who have separated. It would be very useful for us to collate information on other countries that have put that in place.

It might be quite useful for us to seek the views of some of the organisations that we have here in Scotland, such as the Law Society of Scotland, the Family Law Association, the Scottish Legal Aid Board, the Scottish Courts and Tribunals Service, Relationships Scotland and the family law committee of the Scottish Civil Justice Council, to find out where we can take the petition. Those are my suggestions, convener.

The Deputy Convener: Do members agree with those suggestions?

Members *indicated agreement.*

Annexe C

Scottish Courts and Tribunals Service submission of 31 March 2023

PE1984/D: Introduce the C100 form for child arrangement orders in Scotland

Thank you for your email of 8 March 2023 seeking the views of the Scottish Courts and Tribunals Service (“the SCTS”) on the above petition.

The response is submitted by the SCTS acting in its role to provide efficient and effective administration to the courts and tribunals and does not include the views of the Judiciary.

Whilst the introduction of a C100 form or an equivalent in Scotland is a policy matter for the Scottish Government, we have detailed some of the potential impacts the proposals may have on the SCTS below.

- There may be an impact on court time and court programming, particularly as these cases will require views of the child to be considered.
- Changes to court rules and forms will need to be considered, particularly with a view to making them more accessible to members of the public. This would be a matter for the Scottish Civil Justice Council to consider.
- IT system changes will likely be required and there will be costs associated with these.
- Changes in procedure will require the preparation of guidance and training resources for SCTS staff and the judiciary.

We hope this is of assistance to the Committee.

Scottish Government submission of 3 April 2023

PE1984/E: Introduce the C100 form for child arrangement orders in Scotland

I am grateful to the Committee for the letter of 8 March 2023 in relation to Public Petition PE1984. You highlighted the Uitelkaar.nl and AMICA online systems that have been developed in the Netherlands and Australia respectively, and asked for information on what consideration the Scottish Government has given to developing a similar service for parents who have separated in Scotland.

Current position in Scotland

The Scottish Government view is that, generally, it is better if separating parents can agree about what is best for their child. We recognise that there are advantages in resolving cases outwith court as it can be more flexible, quicker, less stressful, and can be less costly than attending court. However, there are cases where dispute resolution other than court may not be appropriate, most notably where there is evidence of domestic abuse.

In many cases couples who are in dispute about parental responsibilities and rights will be able to reach agreement, either through direct discussions, or through discussions conducted on their behalf by solicitors, without resort to contentious proceedings. In Scotland there are also a number of other existing (or planned) resources and services available to help separating parents resolve disputes and make arrangements outside of court:

- The [Your Parenting Plan](#) is a guide produced by the Scottish Government for parents on making voluntary practical arrangements for their children when living apart or separating. To make a formal commitment to reflect the agreement parents can ask a solicitor to help draw up and register a Minute of Agreement in the Books of Council and Session.

- Services such as family mediation and “parenting apart” classes can help parents reach agreement. The Scottish Government gives funding to [Relationships Scotland](#) who are a provider of these services.
- The Scottish Government gives funding to Shared Parenting Scotland to support their online [New Ways for Families](#) training programme to help separated families by teaching the skills necessary to effectively resolve co-parenting disagreements and protect their children from the conflict.
- The Scottish Government is progressing implementation of section 24 of the [Children \(Scotland\) Act 2020](#) to establish a pilot of mandatory information meetings on alternatives to court in child contact and residence cases. We plan to take steps to set up the pilot later this year.

The Scottish Government has also committed in Part 7 of the [Family Justice Modernisation Strategy](#) (published when the Children (Scotland) Act 2020 was introduced to Parliament) to produce guidance for individuals who are considering seeking a contact or residence order on alternatives to court. We plan to progress this later this year and will consult key stakeholders on the draft guidance and the best ways to make that guidance easily available and accessible.

Uitelkaar.nl and AMICA

We understand that the aim behind both of these online systems is primarily to try and keep couples who are divorcing or separating out of court as far as possible. The systems are not therefore directly comparable to the C100 form (or equivalent), which is a means of applying to court online in England and Wales to raise an action.

Uitelkaar.nl

The Uitelkaar.nl system in the Netherlands is an online platform aimed at making the divorce process more accessible. It is designed to help couples “break up well” and to make a personalised parenting plan or divorce plan. A personal case manager offers support through the process and the system is also supported by lawyers and mediators. The system takes couples through three stages: preparation (with

support of a case manager), feedback from a lawyer (to both couples), and court (to make plans official where necessary).

We understand that in 2020, 478 couples finalised the Uitelkaar.nl process and that in 2022 there were between 40 - 50 finalised cases per month. We also understand that Uitelkaar.nl is a financially sustainable service based on the fees charged. The costs range from €38 to €595 depending on which type of divorce settlement and/or parenting plan is processed and whether parents are eligible for a subsidised rate.

The Uitelkaar.nl system is a more recent version of the previous Rechtwijzer pilot project set up by the Dutch Legal Aid Board and others. It was also an online self-help tool for divorce that assisted separating parents in formalising their divorce and parenting agreements. The Rechtwijzer scheme stopped running in 2017 with a view that it should be left to the market to take up. Uitelkaar.nl is a private enterprise that works in cooperation with the government/judiciary/legal aid board.

The Rechtwijzer system was publicised in Scotland at that time. One of the issues identified as a potential barrier to being introduced here was that in Scotland a lawyer shall not act for two or more parties whose interests conflict. Even where the clients say they are in agreement about what they want to do, a conflict of interest could be said to exist if the lawyer would give different advice to each client on that same matter.

AMICA

Launched in June 2020, the Australian AMICA system is a secure digital platform designed for desktops and mobiles, which uses artificial intelligence to take account of various factors and help parents make their own separation arrangements. Agreements are recorded on the system and can be downloaded. Any point where there isn't agreement can be discussed directly between the parties on the system, or progress can be saved while they seek assistance from the legal helpline.

AMICA is backed by the Australian Government (we understand with A\$3 million funding) and is free to use for couples if one person is receiving income support. For anyone else, the process of entering

information to agree arrangements is without charge, then there is a fee payable to finalise and download a written agreement. The fee for a parenting agreement is A\$250.00. We understand that over 10,000 user accounts have been created so far.

Where AMICA is not suitable for a couple, the website can refer to legal assistance or other support services. There is an initial checklist step to identify such cases (e.g. where there is “family violence”, existing court orders, complex financial arrangements). AMICA is not a replacement for legal advice, and it cannot be used to obtain a divorce. However, it is designed to empower couples and reduce disagreement, lowering legal bills and pressure on the family courts.

Introduction of an online system in Scotland

If we were to consider an on-line dispute resolution system here, we would need to assess what would work best in the Scottish context. This would be informed by considering further data and evidence on how the processes in other countries are working and if they are improving outcomes for children and families.

Online dispute resolution systems for family cases are not a priority for the Scottish Government at the present time. Our priority in relation to contact and residence cases is to implement the Children (Scotland) Act 2020 and to carry out outstanding actions in the Family Justice Modernisation Strategy, including raising awareness of existing alternatives to court. In addition, we would need to consider whether there are any set up costs for on-line systems which might need to be met through the public purse. However, we would be interested to consider evaluations of the Uitelkaar.nl and AMICA systems and will keep this area under review when carrying out future work.

Family Law Policy Unit

Scottish Civil Justice Council submission of 3 April 2023

PE1984/F: Introduce the C100 form for child arrangement orders in Scotland

Thank you for your e-mail of 08 March 2023 inviting the Family Law Committee of the Scottish Civil Justice Council to provide views on 'Petition PE1984: Introduce the C100 form for child arrangement orders in Scotland'. This Petition calls on the reduction of financial barriers that prevent parents from having contact with their children by introducing a Scottish equivalent to the C100 form, with a fixed fee, for making applications for child residence or child contact orders.

The Family Law Committee has considered the Petition and provides the following views:

Procedure in England and Wales

- The C100 procedure is only available in England and Wales where parties have first attended a Mediation Information Assessment Meeting ("MIAM") and have either been deemed unsuitable for mediation or the mediation process is unsuccessful. There are associated costs with this process. Only once that process has concluded can applicants lodge a C100 form. However, as highlighted at the Citizen Participation and Public Petitions Committee ("CPPP"), the form used in England and Wales is not without difficulty with many people who have no prior legal experience requiring assistance to fill in the form.
- Whilst the lodging of a C100 carries a fixed fee, applications within proceedings are also chargeable so the overall costs for the whole process can be higher, significantly so if there is legal representation.

Costs and Legal Aid

- Legal aid remains available to those eligible in Scotland for family cases. The situation is not the same as in England following the introduction of the 'Legal Aid, Sentencing and Punishment of

Offenders Act 2012'. Therefore, any perceived financial barriers to obtaining a judicial determination are not the same between the two jurisdictions.

- The proposal of a fixed fee system seems to be unworkable within the present system of court fees. Given the nature of an action (relating to the welfare of children) where the procedure required can be impossible to predict, it would be difficult to arrive at an appropriate fixed fee suitable in all cases. Presumably the introduction of a fixed fee system would have to apply to all actions concerning parental responsibility. Therefore, any fixed fee would require to be at a level sufficient to cover child welfare hearings and any proof.
- It is often of assistance to parents to have impartial advice before they embark on a court action to resolve arrangements for the care of children. Many solicitors in Scotland operate fixed fee systems to enable advice to be given in advance of court actions being initiated.

Court Procedure

- As highlighted previously by the CPPP, even if the court action was initiated by a form, the procedures thereafter would need to furnish the court with sufficient information to form a view on orders conducive to the welfare of the child. We operate in an adversarial system where that information is ultimately provided through evidence before the court. Any form based system would need to give sufficient notice of the arguments of both parties.
- The use of a form to initiate a court action would not relieve the court of the obligation to give the child an opportunity to express their view in relation to the application. The F9 procedure (in the sheriff court) would continue to apply. The Family Law Committee spent a considerable period of time developing rules to ensure that forms were prepared in advance so the sheriff has the ability to approve or amend forms before they are sent to children. Compliance with those rules would be required even where a form initiated the court process.

General Observations

- It is always be better for parties if they are able to reach agreement on reasonable arrangements for the care of children without resorting to judicial determination. A form based system may encourage people to attempt to go straight to court without considering alternative routes first and without having advice on their position.
- The Children (Scotland) Act 1995 effectively creates a presumption that children will have the benefit of direct contact and personal relations with both of their parents where those parents are separated. The Scottish Government has not adopted the policy of creating a presumptive regime for separated parents (as has been adopted in other jurisdictions beyond the United Kingdom). Where parents cannot agree, the Scottish system is for judicial determination. Any other approach would require a change in primary legislation.

Overall, it is the Family Law Committee's view that the introduction of a form similar to the C100 would be a significant innovation in relation to the Scottish system for initiating a court action in relation to children, which may be beyond the scope of its remit. It is tentatively suggested, however, that should such an innovation be considered desirable, it would require a significant policy shift to create a system similar to that used in civil simple procedure cases in relation to the care of children. However, before even considering such a course, a review of the present system (including legislation) would be required. Proper funding would also be necessary to facilitate this. Unless such a review takes place, together with the resolution of the issues mentioned, the Committee has considerable reservations about the introduction of a form based initiating document or for the introduction of a fixed fee system.

Whilst currently the Family Law Committee does not see the benefit in the introduction of such a form, information on work done by the Committee which may reduce any financial barriers experienced by parties can be provided.

The Family Law Committee spent a significant period developing new rules in respect of family and civil partnership actions in the sheriff court. The overall policy aim of these rule changes is to improve the progress of family actions, with particular regard to preventing undue delay in proceedings relating to the welfare of children. These rules are designed to ensure consistent and effective case management of actions while also providing a clear, streamlined structure to the Court process. It is hoped that this new process will also reduce overall costs and the time taken to reach a final decision. These rules commence in September 2023.

Finally, the Family Law Committee has developed draft rules to support the Scottish Government's proposal on extending the use of Simplified Divorce and Dissolution. This would result in parents of children under the age of 16 who have reached agreement about the arrangements for the child(ren) being eligible to use that process. Once commenced by the Scottish Government, it is expected that this would result in considerable savings for relevant parties.

Relationships Scotland submission of 4 April 2023

PE1984/G: Introduce the C100 form for child arrangement orders in Scotland

This petition has been under consideration by the Citizen Participation and Public Petitions Committee since November 2022. At the Committee meeting of 22 February 2023 it was suggested that the views of Relationships Scotland, and others, be sought.

The petitioner previously submitted petition PE1917 '*Calling on the Scottish Parliament to urge the Scottish Government to provide full legal aid to all parents who are fighting for access to their child/children regardless of their income.*' Relationships Scotland submitted a response to that petition, noting support for the principle within the petition that money should not come in-between a child having a relationship with their parents. We are aware of many families where finance is a barrier, children are losing out and the stress is contributing

to serious mental health issues. The current system is failing many children and their families.

Response from Relationships Scotland to Petition PE1984

Relationships Scotland welcomes this opportunity to comment further on the issue of reducing the financial barriers that prevent parents from having contact with their children.

Relationships Scotland is a network of 21 Member agencies providing a range of support to families with relationship difficulties across Scotland. In the context of family law, we work with families with issues arising from separation and divorce, parenting, contact and residence disputes. This is primarily through family mediation, which helps parents to discuss and agree arrangements for the care of their children, and through Child Contact Centres that support children to have a relationship with a parent or carer who they are not living with. We also offer counselling for adults, children and young people and separated parenting information sessions (Parenting Apart).

The current petition calls for the introduction of a Scottish equivalent to the C100 form, with a fixed fee, for making applications for child residence or child contact orders. The hope being that this would support quick resolutions of the contact arrangements for a child and reduce the financial barriers coming in between a child seeing both parents.

Relationships Scotland supports the principle of quick, and importantly child focussed, resolutions of contact and parenting disputes that minimise financial burdens. Our understanding of the use of the C100 form in England is that mediation needs to be considered first, where appropriate, and that the form lays out the issues to be considered in the initial hearing.

We have noted the submission to the Committee from Shared Parenting Scotland of 6 December 2022 and in addition to the financial barriers we agree that the current process for raising court actions in Scotland is difficult to understand and hard to use.

We suggest a review of the current process in Scotland for making applications for child contact or residence orders be undertaken. This could consider options to attend to the financial barriers, as well as accessibility issues and help parties to identify the most appropriate route to resolve their disputes as effectively as possible. The introduction

of a C100 type form, appropriate for the specific Scottish legal system, may be part of the solution but a new form alone is unlikely to deliver the outcome that the petitioner is seeking to achieve.

Guidance for the public using clear, easy to understand, accessible language would help significantly with some of the difficulties. This was a key area identified in the Family Justice Modernisation Strategy of 2019 which is well overdue.

Mandatory information sessions on alternative dispute resolution options would help parents to understand and explore the best process for them to use. These sessions are also an opportunity for parents to find out about other support that is available for them. A pilot of these sessions was included in the Children (Scotland) Act 2020 and although we understand some of the reasons, we are disappointed with the slow progress on the implementation of this pilot. ([Children \(Scotland\) Act 2020 \(legislation.gov.uk\)](#))

We are aware of recent initiatives in England to encourage separating parents to use mediation and attend co-parenting programmes. ([Plans to protect children under new mediation reforms - GOV.UK](#)). In addition, there has been investment in the Separated Parents Information Programme (similar to Parenting Apart sessions) to make this accessible online and connect it with Parenting Plans and mediation services.

We propose that investment is made in Scotland to make the support available for separated families more obvious and joined up, so that parents know where to look for help when they split up. This would support accessibility, the effective resolution of disputes and minimise financial barriers. One option could be an online portal or webpage that:

- explains the court process in clear language
- includes information about legal aid funding that is available
- identifies the various routes for resolving disputes, including mediation, and the cost implications of each
- highlights the Scottish Government Parenting Plan materials
- signposts other resources for parents who live apart, and support such as Parenting Apart information sessions
- collates information on the range of agencies that can help

In summary, we agree with the intent of the petition, to reduce financial barriers and support effective resolutions to contact arrangements. A

number of initiatives have been suggested above to deliver that positive outcome for children and families.

Scottish Legal Aid Board submission of 6 April 2023

PE1984/H: Introduce the C100 form for child arrangement orders in Scotland

Thank you for your letter of 8 March 2023 seeking the views of the Scottish Legal Aid Board on the action called for in the above petition.

Whilst we consider the petition is of more significance and relevance to the Scottish Courts and Tribunal Service, we offer the following observations to the committee.

It seems the petition before the committee seeks to provide opportunity for party litigants to have cases heard in court without the requirement to instruct a solicitor. This would be advantageous to citizens who don't qualify for legal aid, but who might struggle to pay for a solicitor on a private basis.

We agree with the observation in the notes of the Committee that whilst the use of the C100 has potential to simplify proceedings at the start of the case, it won't necessarily do so. The C100 is a complicated form, which may still present a barrier to some, although there may be scope for an improved and simplified form to be devised, if this approach is considered to be worth pursuing.

However, the current or any amended form may not always give all the information necessary to allow the court to determine the best interests of the child in relation to any dispute and cases may still become more complex or involved as they progress. This might result in parties seeking advice and representation from a solicitor as the case progresses.

Should a citizen wish to seek assistance from a solicitor to complete the C100 itself (or similar form), its introduction is unlikely to bring about any savings to the Legal Aid Fund. However, it would potentially be of assistance to those who have difficulty finding a solicitor to represent

them, to the extent that they are able to complete the form without assistance.

An increase in party litigants could also potentially have cost implications, as our experience suggests that costs are likely to be greater in a case involving a party litigant opponent. For example, there tend to be more hearings, which are often longer than those involving parties represented by solicitors.

Finally, any change to the way cases are initiated would require a wider overhaul of the court rules, which are framed around the current procedure involving the use of initial writs.

We hope that this information is helpful and if we can be of any more assistance, please do not hesitate to get back in touch.

Law Society of Scotland submission of 29 July 2023

PE1984/I: Introduce the C100 form for child arrangement orders in Scotland

Thank you for your letter seeking views on the above petition.

Though we would not necessarily support the introduction of the C100 form, the petition raises wider issues around affordability and accessibility for parents and children in organising and maintaining child contact, which are important to consider.

While Scotland maintains legal aid provision for child contact, unlike England and Wales, there are many families that find themselves outside the financial scope of this system. Also, the financial eligibility for legal aid has not kept pace with inflation, resulting in fewer and fewer people being eligible for legal aid over time, an issue that we have raised separately in terms of future legal aid reform.

A necessary step prior to seeking a child arrangement order in England and Wales is the completion of a Mediation Information and Assessment Meeting (MIAM). Where a party is eligible for legal aid in England and Wales, there are not separate costs for this meeting. The Children

(Scotland) Act 2020 introduced a mediation pilot for family cases in Scotland, with an evaluation pending. Following the MIAM, however, there is not legal aid available for any court proceedings (though there is a scheme for fee remission depending on a party's financial eligibility).

Ensuring that any process for seeking court determination of child contact needs to be accessible and further consideration could be given to the current forms and guidance. The petition also notes the fixed fee element of the C100 form in England and Wales, which is currently £232. There is not a fixed fee element in Scotland, with fees charged instead for a party to lodge a writ (£135) and the other party to lodge defences (£134). There can be additional court fees in the event of proceeding to an evidence hearing, though this is usually rare in child contact cases (and if eligible for legal aid, that scheme meets the cost of all court fees applicable). A fixed fee for court fees might offer greater predictability, and reduce the cost of court fees in more complex cases, though would follow that court fees would increase (at least marginally) in less complex cases.

Issues around support through technology have also been raised, and these merit further exploration. Whether interactive forms of guidance, or more directly facilitated through online dispute resolution, there may be benefits in terms of accessibility.

We hope that this information is helpful and if we can assist further in consideration of this petition, we will be very happy to do so.