# **UPowerWAD**

# METHODOLOGICAL TOOLKIT



How to capture and categorise feedback from users in the context of web accessibility



#### **PROJECT**

UPowerWAD: Involving, empowering and training end users with disability to fully participate in the Web Accessibility Directive objectives

#### **PROJECT ID**

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Methodological toolkit on how to capture and categorise feedback from users in the context of web accessibility

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# 1. INTRODUCTION

The project developed the present methodological toolkit on how to capture and categorise feedback from users in the context of web accessibility. More project results will complement this toolkit.

The project UPowerWAD: "Involving, empowering and training end-users with a disability to fully participate in the Web Accessibility Directive objectives" aims to raise awareness, engage, empower, and train People with Disabilities to participate actively in the implementation of the Web Accessibility Directive by providing constructive feedback regarding accessibility issues of the public sector websites and mobile applications across Europe.

#### The users

This will help tapping into the knowledge of people with disabilities and to engage them to actively participate in improving the accessibility of public sector websites and mobile applications. Apart from supporting public sector bodies in becoming more accessible, users will also have better possibilities to participate in society, better access to higher levels of education and better preparation for new employment opportunities.



### The toolkit and other project results

The UPowerWAD project developed the present methodological toolkit for how to capture and categorise feedback from users in the context of web accessibility. An interactive repository of best practices for structuring and reporting web accessibility issues is also part of the project.



The toolkit and the repository will facilitate building a model curriculum on how to set vocational education and training (VET) courses to train persons with disabilities to be more independent and provide relevant and actionable feedback on web accessibility issues. The curriculum will be developed in English, and translated, localised and piloted in France, Germany, and Sweden.

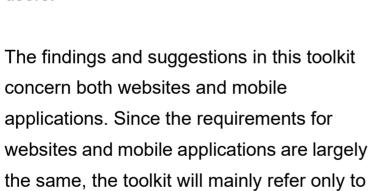


Finally, the consortium will produce practical guidelines on how to scale up the curriculum to different contexts and member states across Europe, facilitating the production of specialised VET courses in the field. VET courses will enable the actual training of a wide range of ICT skills and web accessibility to empower them to provide feedback regarding the accessibility issues of public websites.

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This toolkit and the curriculum aim to identify expertise and needs that influence feedback, raise awareness, create technical knowledge, and to improve the quality and increase the volume of feedback the users give.

This toolkit is aimed at Disabled Persons
Organisations and VET providers. Its
objective is to assist them in categorising the
users' competences in providing constructive
feedback for public websites and to support
them to identify training needs. At the same
time, it helps public sector bodies that want to
enhance their communication with users, and
it also provides a practical overview for the
users.



The toolkit has been created as a direct collaboration between the UPowerWAD consortium members: the European Blind Union, Funka, SYNTHESIS Center for Research and Education and TU Dortmund University.

websites.



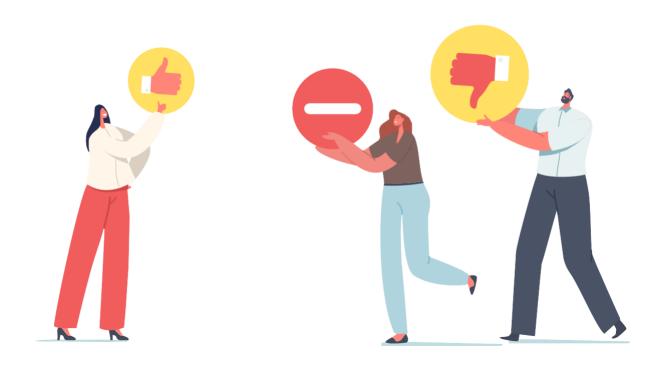


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## 2. BACKGROUND

The overall idea of the project is to empower and engage users with disabilities to provide relevant feedback regarding accessibility issues, to make them more independent and participative in society.

The Web Accessibility Directive ensures the right to give feedback on accessibility: public sector bodies must set up a feedback mechanism for their websites and mobile applications. This is based on the right of persons with disabilities to express their opinion as set in Article 21 of the Convention on the Rights of Persons with Disabilities.



The Web Accessibility Directive (WAD) is one of the EU laws concerning accessibility, which entered into force in December 2016. The WAD requires public sector bodies' websites and mobile apps to be accessible to users, mainly persons with disabilities, and to document and monitor their accessibility. The WAD has set up three primary means that help document and improve accessibility:



an accessibility statement that public sector bodies have to publish for all of their websites and mobile apps;



a feedback mechanism so users can flag accessibility problems or request information published in a non-accessible content;



regular monitoring of public sector websites and apps by Member States, and reporting on the results.

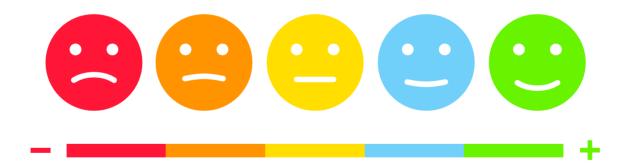
Constructive feedback from users can help website owners to focus on relevant problems, which in turn may improve the experience and the services offered by public sector bodies to all citizens, with or without disabilities. Public services' feedback mechanisms are a direct line of communication with the citizens, facilitating their feedback on the accessibility of the websites and mobile applications. How public sector bodies react and respond to citizens' feedback can affect how the feedback mechanisms will be used. If they see user feedback on accessibility as constructive, it can become a driving force that will help considerably improve a public website and the services offered to the citizens.

#### How often is the feedback mechanism used?

In 2019 the European Disability Forum published the results of a <u>survey</u> about the awareness and perception of the early impacts of the WAD.

Most respondents did not know which is the responsible body for implementing and monitoring the WAD and they found that the feedback mechanism was absent on many government webpages.

The European Commission's <u>Study on Implementation of the Web</u> <u>Accessibility Directive</u>, from 2019, shows that at the early stage of implementation accessibility statements were available on 46% of the analysed websites. However, none contained all the (mandatory and optional) content items defined by the draft model statement, one of which is the link to the feedback mechanism. The user survey findings show that users with disabilities regularly use public sector bodies' websites and apps. Most respondents used public sector bodies' online channels to find information.

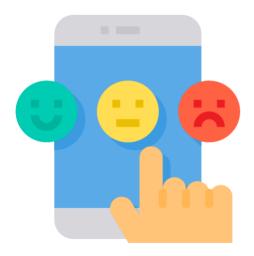


Websites and apps are also used to contact public sector bodies or apply for services by filling in online forms. User satisfaction with these public sector bodies' websites and apps was neutral. One-third of the users were not yet familiar with the existence of accessibility statements, while feedback and enforcement channels were often being used.

In 2021 the European Commission evaluated the implementation of the WAD. The consultations during the evaluation showed that awareness and the frequency of using of the feedback mechanism still has room for improvement. The recent reports of the National Enforcement Agencies clearly show that there is almost no feedback on the still existing barriers on the websites of public sector bodies.

The UPowerWAD project conducted a series of interviews with end-users on the WAD feedback mechanism (see following Chapter for information on the methodology). These were our main findings:

68% mentioned that they face barriers on public websites, although 35% of those would manage to get the information they need.





Only 38% of the interviewees provided formal feedback regularly. Even though at least 84% of them commented on somebody on accessibility barriers they faced.



It needs to be mentioned that the relatively high number of users that provided feedback, shown in these surveys, is influenced by the respondents' profile: many of them had already been interested in the topic, were engaged in Disabled Persons Organisations, etc. Data on feedback received by public sector bodies shows that the percentage of persons using the feedback mechanism is much lower in the general population. During the 2021 evaluation of the WAD implementation, most of the Member States reported a lack of accessibility statements and that very little to almost no feedback was received from users.



It is clear that more information and effort is needed to spread awareness among persons with disabilities to exercise their right to give feedback on public websites. At the same time, public services need to facilitate user feedback and act on it when received, so that end users find it worth their while to contribute.

# 3. METHODS USED TO CREATE THE TOOLKIT

The research to develop this toolkit was carried out in cooperation with persons with disabilities and Disabled Persons' Organisations. The consortium also considered previous research by the European Commission and other organisations.

As a first step, we interviewed users with disabilities about their experiences and user expertise. Using the partners' existing contacts and the network of associated partners, the Consortium interviewed 37 end users, covering a wide range of user needs. User needs were related to:

- usage without vision,
- usage with limited vision,
- usage without perception of colour,
- usage without hearing,
- usage with limited hearing,
- usage with limited cognition,
- usage with limited manipulation or strength, and
- usage with speech impairment





The interviews inquired about the needs, preferences, and expectations of the users regarding feedback mechanisms and about their ICT and web accessibility expertise.



For me, web accessibility means that I can easily find the information I need and look for, and the navigation and design of a website/app is simple. (Interviewee from Sweden)

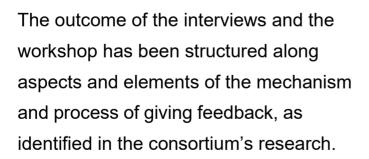




Websites often do not use the correct coding for specific information (e.g. tables, figures). It takes too much time to find the area you want to access. (Interviewee from Estonia)



The second step was to organise a workshop to test and validate the interview results. The online workshop took place on the 10<sup>th</sup> of June 2022, with 75 participants.





This toolkit presents those aspects and elements, offering a structured way to look at the feedback mechanism and helping to categorise the expertise of the users giving feedback, as well as providing some reasonable guidance and suggestions that public sector bodies and users can use.

## 4. FEEDBACK FRAMEWORK

#### What might influence feedback from the user side?

- The barriers they perceive
- The quality of the feedback channel, like
  - findability
  - o accessibility and ease of use
  - o probability of response
  - style

### The barriers they perceive

One of the things that influences the feedback process from the user side is the perception of barriers that the user has. According to the UPowerWAD interviews, Users provide feedback on accessibility barriers based on their own experience, the specific actions they often do, and what they find difficult when visiting a public website and searching for information. This might directly affect the feedback they give and what barriers they perceive as critical enough to report.

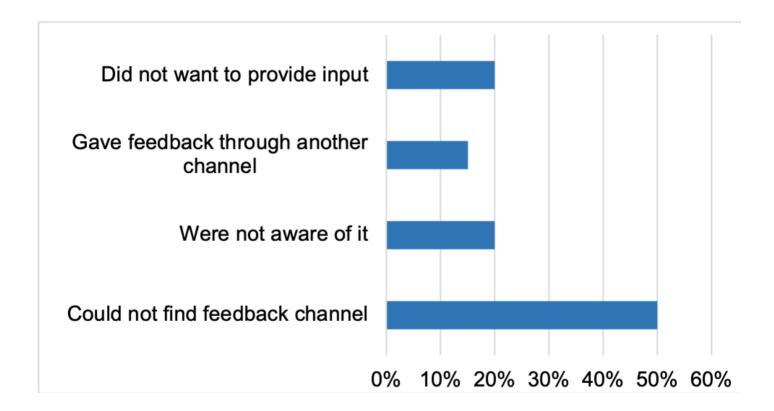


Nevertheless, reporting barriers is essential even when the barrier was not hindering the user getting the information they needed. Reporting a small obstacle – including those that are not covered by the legal requirements – can help other users with less ICT skills or accessibility knowledge.

### The quality of the feedback channel

Another factor is the quality of the feedback channel: whether it is accessible and easy to use. In our research:

- Most of the users that didn't give feedback were hindered by not finding the feedback channel (50%).
- 20% of users were not aware of the possibility to give feedback using a feedback mechanism.
- 15% of the users gave feedback through another channel that was not connected to the accessibility statement.
- Another 20% did not want to provide input.





If the feedback channel is accessible, easy to find, clear and straightforward, it's more likely for the citizens to use it and provide comments on their experience.

The format of the feedback channel can vary, and alternative means can be available such as a form to complete with options to choose e-mail, chat/video chat, or phone/video call. Providing alternative ways makes it possible for more users to act and use the feedback mechanism.



The user's previous experience providing feedback can also influence their willingness to use a feedback mechanism. If the feedback given is being considered and a response is sent to the user, it is more likely that the user will give constructive feedback again, in another case. An approach focusing on the user increases the likelihood that they will seek the feedback mechanism and share their suggestions for the public websites and mobile apps they use.



Because of that, it is important how the accessibility statement is formulated. It sends a message about how the public service provider considers the needs of the users and whether it is genuinely interested in including all users.



# 5. CLASSIFICATION OF END-USERS WITH DISABILITY KEY EXPERTISE

Users have different user needs and different expertise. We have grouped the characteristics we found into three areas, relevant to providing accessibility feedback.

#### **Knowledge/Experience**

Users may differ in

the level of ICT knowledge and usage (beginners to experts),

the level of accessibility knowledge,

the knowledge and experience with providing feedback,

their experience with accessibility barriers and use of assistive technologies.

The more knowledge users have on web accessibility, the higher the possibility of giving actionable feedback.

Users with higher ICT level and web accessibility knowledge might provide technical details, even if not asked, while users with lower-level knowledge may give more generic feedback.

ICT knowledge can indicate the skill level to explain an accessibility problem well. Nevertheless, feedback from persons who claim to have a lower ICT knowledge level is still useful for website owners, as it can highlight the accessibility problems such a user group faces, even if not using the web accessibility terminology.

#### **Motivation**

Regarding the motivation to use the feedback mechanisms, users have different levels of general willingness to give feedback. Some will seek the feedback mechanism to exercise their right to express their opinion. On the other hand, some users will avoid giving feedback. There can be various reasons for that. Among other things, it can happen because:

they feel they lack the knowledge to provide feedback,



- they do not consider it worthwhile,
- previous negative experiences and difficulties in the process that had discouraged them from repeating the effort (no answer or confirmation provided, no improvement, discouraging answer or communication style),



even fear of contacting the authorities.



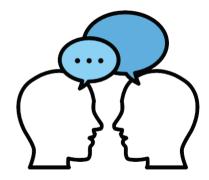
#### Communication

People express themselves in different ways and use different means. What is easy or preferred for some, might be difficult or disliked for others. This affects the preferences for feedback channels and format (e.g. structured forms, open-ended questions, chat, phone). The type of disability the user might have plays a significant role in their preferences. For example, deaf users might prefer using sign language in a video call instead of writing feedback, and users with visual impairments might choose a phone call.

All these aspects should be kept in mind when receiving and processing feedback, as well as during communication with the user.







# 6. CHALLENGES TO PROVIDING FEEDBACK

This chapter maps the main challenges and barriers users face in providing feedback. After each challenge, suggestions are provided that can help public sector bodies to avoid the challenges by satisfying the users' needs and expectations; as well as some tips for the users who want to use the feedback mechanism.

# Challenge 1: The user is not aware of the feedback mechanism



Some users are unaware of their right to give feedback on public websites or that there is a feedback mechanism they can use.

### Addressing the challenge

- Raise awareness of the right to give feedback and its usefulness for public sector bodies. Publicise information about the accessibility statement and the feedback mechanism.
- Present the feedback option in a prominent way (e.g., using a barrier feedback button).
   It does not only increase the possibility that the user finds it but it can also inform users about the existence of a feedback mechanism



# Challenge 2: The user cannot find the feedback mechanism



Some users cannot find links to the accessibility feedback mechanism. They end up using other "generic" feedback channels or they end up not giving feedback at all.

### Addressing the challenge

- Make the accessibility statement visible and easy to identify and find.
- Add direct alternative access to the feedback mechanism from other parts of the website, not only from the accessibility statement.



## > Tips for the user

Look for the accessibility statement. If you cannot find it, search for the words "accessibility statement" or "accessibility" in the search box.



If you find it tiresome or annoying to chase the accessibility feedback mechanism, use a generic feedback channel (usually e-mail or phone). It is often called "Contact" or "Contact us", and you can often find it in the header or the footer. Mention in the e-mail subject or in the beginning of your message that you give feedback on accessibility.

CONTACT US

# Challenge 3: The feedback mechanism is difficult to use



The feedback form's complexity and size can discourage some users from completing it and submitting it to the website owners. It can mean that the feedback form has too many questions, questions that are complex or require technical knowledge that users might not have, or complicated questions.

## > Addressing the challenge

- Make sure the feedback mechanism is easy to use
- If feedback is given using a form, provide an understandable structure.
- lt is useful if the form offers automation for filling in certain technical details, e.g., the operating system and browser used, the page about which the feedback is given. In that case, make sure the user knows about it.
- If you use a complex feedback form, offer also simpler feedback possibilities to the user.
- For forms aiming for detailed feedback, provide the possibility of giving details in an additional field/section, encouraging expert users.
- Offer alternative channels to support different user needs and preferences. E.g., phone for users preferring voice communication, form or e-mail for users who want to give written feedback.

## > Tips for the user



Look for the easiest and most convenient way for you to give feedback. Provide the details that you can communicate easily and aim to share information about what is described in Chapter 7: Actionable feedback content.

# Challenge 4: The user does not know how to give feedback

Some users do not feel they have the technical knowledge to provide feedback and don't feel confident in trying.



## > Addressing the challenge

- Provide guidance on the process of giving feedback and on what details the user is encouraged to provide in their feedback.
- Make the guidance easy to understand and provide practical instructions and examples (e.g., to identify the webpage with the error, the user can copy the URL address from the address bar, at the top of the browser).
- In case of a feedback form, provide instructions and help linked to the different form fields.
- Show a welcoming approach. Reassure the user that any feedback is welcome— even though the more details they provide, the easier it is to solve the issue.

## > Tips for the user

Don't be afraid of the technical details. If you don't know them, and you cannot find them using the instructions provided in the feedback mechanism, you simply don't include them in your feedback. Or you can write that you don't know them. Not everybody is an expert!

# Challenge 5: The user is uncertain about their knowledge

When they face a barrier, some users are unsure if they should report it because it might not violate a legal accessibility requirement. So, they might choose not to report it in the end.



## > Addressing the challenge

- Do not restrict the possibility to give feedback, e.g., by referencing the scope of the law. It can deter that are not familiar with or do not understand the legislation and the standards.
- Welcome any feedback, including broken links, comments on usability, etc. It can lead to a better user experience for all.

## > Tips for the user

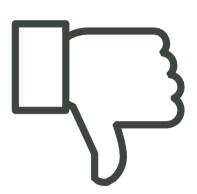
If you face a barrier and you are not sure whether it is covered by the accessibility regulations, it is always better to report it. The owner of the website should know how to handle it.



## Challenge 6: The user is not motivated to give feedback

As mentioned in Chapter 5, users have different levels of motivation to give feedback. Some users might not be motivated. Some of the reasons for that can be:

- >>> Previous negative experience,
- Being "afraid" of authorities,
- Not considering it important,
- Not considering it the user's responsibility.



## Addressing the challenge

- Assure the users through the accessibility statement and the feedback page that their feedback is welcome, important and that it will be answered.
- The language should never suggest that it is the users' duty to find the accessibility issues and provide feedback. It is the responsibility of the owner to make the website accessible.
- Set up adequate procedures to ensure that feedback is acted upon, and that the user is informed about it. This can be done in many ways and steps: from confirming receipt of the feedback to contacting the user for further details and/or providing updates on the progress or setting up a system where the users can follow up on the status of their feedback, and possibly the feedback of other users. All this increases the confidence of the users that their feedback is welcome and valuable.

It is also useful to mention the possibilities for giving anonymous feedback, or explain why the user cannot give anonymous feedback, if that is the case. It should be kept in mind and explained though, that anonymous feedback can create difficulties with the feedback and complaint process of the WAD: it can restrict the possibilities to ask for more details from the user or inform them that the issue has been solved. And it can also prevent the user from using their right to complain to a supervisory body.

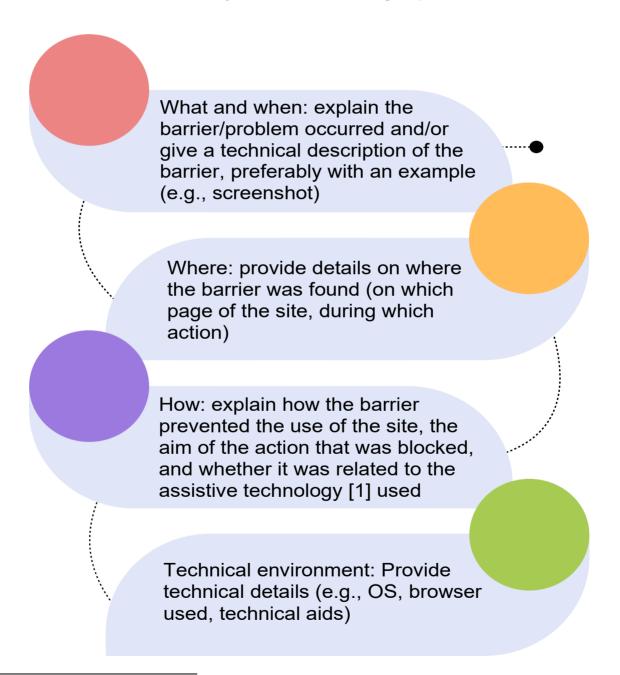
## > Tips for the user

With some feedback mechanisms you can decide not to provide your name or contact details. But it has its benefits to share those details. That way the owner of the website can contact you to ask for some details they need to solve the accessibility issue. It can also be important if you would like to formally complain about the answer received, or about not receiving a reply: in some countries it is necessary to show that you first gave your feedback directly to the website owner.



# 7. ACTIONABLE FEEDBACK CONTENT

The content of the individual feedback is also crucial. If the user provides the necessary basic information when describing their experience, the feedback will be actionable. Users may detail the following aspects in their feedback.



<sup>[1]</sup> Products or systems that support and help individuals with disabilities, restricted mobility or other impairments to perform functions that might otherwise be difficult or impossible. These devices support individuals to improve or maintain their daily quality of life by easing or compensating for an injury or disability. [Assistive technology: definition and safe use - GOV.UK (www.gov.uk)]

The website owner can facilitate getting the necessary information in different ways. Along the same questions as above, the following aspects should be asked and considered.

#### What happened and when

There are various sways to describe an accessibility issue, and to remediate different kinds of problems, different levels of detail might be necessary.

The user doesn't need to know the accessibility terminology to describe their experience. It might be enough that the user provides a simple description of the difficulty faced and refer to which part of the website and during which action this difficulty appeared.

If the description is not detailed enough for the website owner to understand the issue or take action, the website owner can ask the user via the appropriate communication channel about the complementary information.

In order to receive the necessary information in the feedback, the website owner can provide guidance to the user on how to describe the reported issue.

#### Where was the issue found?

The website owner needs to be able to identify where the accessibility issue occurred on the website or in the mobile app. Therefore, the feedback needs to provide details on where the user found the barrier. In order to get this information, the website owner may:



ask for it specifically in a feedback form or in the instructions to the feedback mechanism,



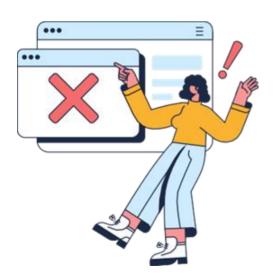
provide guidance on how the users can identify the relevant webpage,



provide feedback opportunities on each webpage,



automatically detect the webpage on which the feedback was given, informing the user about it or asking their permission to detect it.





#### How does the issue create a barrier for the user?

An accessibility barrier can be related to how the user uses a website, for example, whether they use assistive technology.





It helps to learn how the barrier blocked or complicate user's action, and what the user could not achieve because of the difficulty faced. The user may be guided to give a simple description with words or screenshots so the website owners can understand how the issue affects the users' effort to access the service.



The feedback mechanism or a follow-up question to the user may inquire about whether and what assistive technology the user was using when the issue occurred, e.g. type, name, version number, relevant setting.

#### What is the technical environment?

It is often important for the website owner to understand what platform, browser, etc. the user is using, in order to be able to fix an issue. At the same time, not all users are aware of what version of the operating system they are using. In addition to asking for these details, the website owner can also:

- Provide information and instructions on how the users can find the technical details (OS, browser used).
- Set up a mechanism that can auto-detect these details, asking the permission of the user to detect those details.
- Ask the user via the appropriate communication channel about the relevant technical details that are needed to reconstruct and fix the problem.
- The owner should always use engaging language in order to ensure an open and cooperative interaction.

# 8. WAYS TO CAPTURE FEEDBACK

Concerning the ways to collect feedback, the principal characteristics of the various feedback mechanisms that have been identified or proposed are listed below. These features allow for the classification of individual feedback mechanisms.

## **Channel types**



**Form** 



E-mail



Phone



Live chat



Live video chat

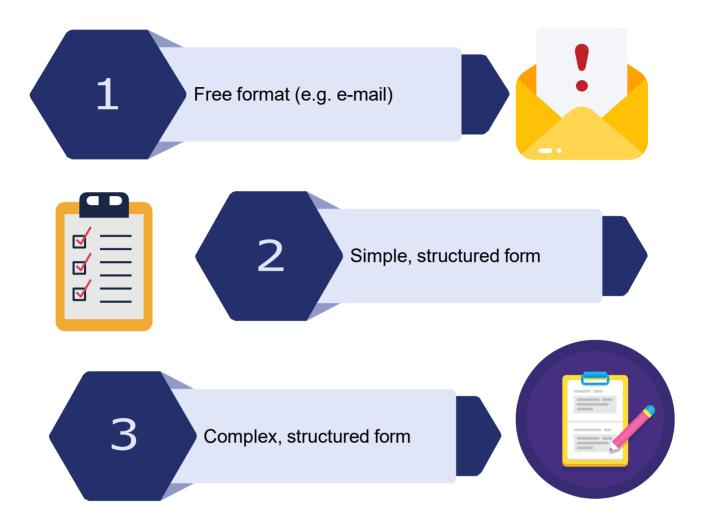


Voice/video message



A combination of the different channel types could facilitate addressing the needs of users with various disabilities.

#### **Structure**



## Specific or generic mechanism

The feedback mechanism (be it a form, an e-mail etc.) might be dedicated to accessibility or use a generic channel where feedback can be given on various issues. In any case, is crucial that the feedback gets to the right person or team.

- Feedback mechanism dedicated to accessibility.
- Generic feedback mechanism with the possibility to mark the area accessibility.
- Generic feedback mechanism

#### Level of guidance

- Guidance can take different forms and depth: from simple indications on what is expected, to detailed instructions and help to identify the details that are relevant for actionable feedback.
- Guidance and instructions may consider different usage needs (e.g. they are also provided in easy-to-read or sign language versions).



#### **Access**

- From the Accessibility statement only.
- Global access (e.g., in the footer, header or similar, on each webpage).



### Response

- What response is given: automated confirmation of receipt / personalised / further follow-up communication.
- The style of communication used in the response.



# 9. EXAMPLES OF FEEDBACK MECHANISMS

Here you can find some of the relevant findings presented in three feedback mechanism types:

#### Feedback mechanism using e-mail and phone



Alternative feedback channels (e-mail and phone) are offered.
Clickable links are offered to the user to these channels, for easy access.

The links to the accessibility statement use the correct wording so users can find it when searching.

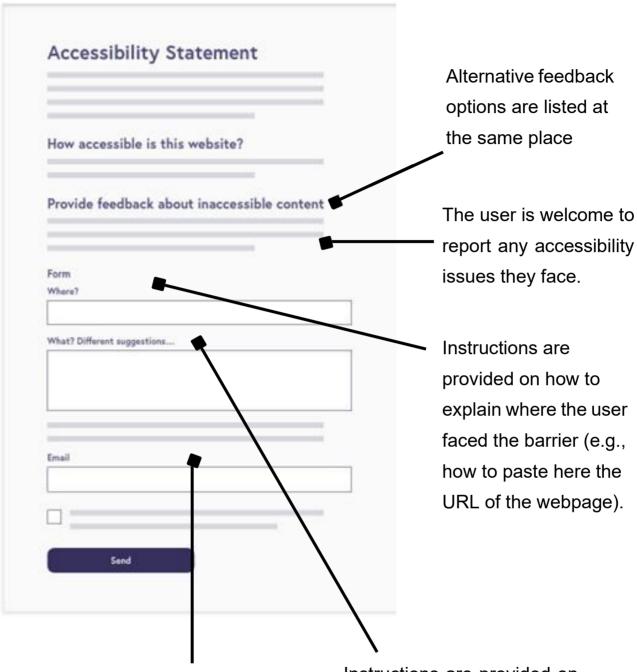
The accessibility statement is written in an understandable way and explains the shortcomings of the website, instead of listing requirements in a highly technical language.

The feedback opportunity is easy to identify.

Instructions are provided for the user, on what to include in their feedback, and how to obtain technical details.

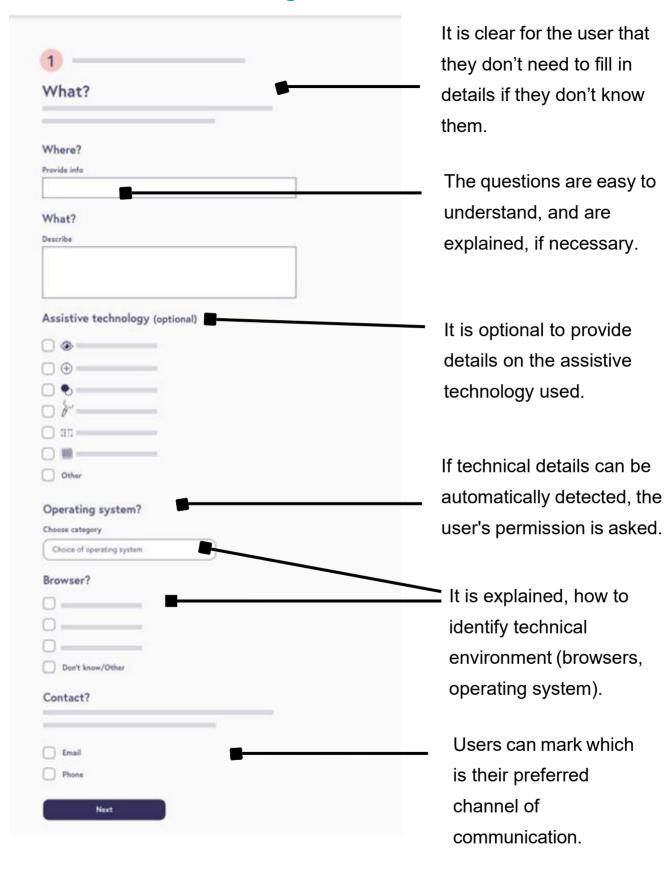
Any feedback on accessibility is welcome.

### Feedback mechanism using a simple form



It is clear whether the user can give anonymous feedback, and what are the advantages of providing contact details. Instructions are provided on what details the user should share about the accessibility issue.

#### Feedback mechanism using a detailed form



# 10. TRAINING ABOUT FEEDBACK

One of the obligations in Article 9(2) of the UN Convention on the Rights of Persons with Disabilities is to provide training on accessibility to "stakeholders". Accessibility issues should be part of university and professional/VET education and offered to current professionals and manufacturers as a component of continuing professional development. Moreover, persons with disabilities and the Disabled Persons Organisations should also receive training on how to best use feedback mechanisms on public websites and demand that such mechanisms are offered for all users and public websites' visitors. Feedback mechanisms should be seen as part of their right to express their needs as citizens.



What aspects should we consider when organising an accessible training? You can find useful tips in the <u>Manual for trainers</u> developed by the Entelis+ project.

### Universal design for learning

Universal design for learning (UDL) is a teaching methodology that respects the needs and abilities of all learners and removes unnecessary obstacles in the learning process. It creates a flexible learning experience, where information is offered in various ways, and learners are provided with multiple forms of expressing their learning, perceiving, and comprehending new knowledge. UDL facilitates the creation of an inclusive environment in a classroom where learners feel that they are respected, encouraged, and valued. The core notion in UDL is that barriers to learning are in the environment's design, not in the learner. If these barriers are removed, the learning outcomes will be maximised for a broader range of learners

The <u>UDL Principles</u> are very useful when you design a lesson plan. In the one-page print with the principles you will find helpful examples of how to apply them with your learners.



# 11. THE ORGANISATIONS BEHIND THE TOOLKIT



#### **European Blind Union**

EBU is a non-governmental, non-profit-making European organisation founded in 1984. One of the six regional bodies of the World Blind Union, it represents the interests of 30 million blind and partially sighted persons at European level EBU aims to protect and promote the interests of all blind and partially sighted persons in Europe and works towards an accessible and inclusive society with equal rights and opportunities for them to fully participate in all aspects of social, economic, cultural and political life.



#### **Funka**

Funka was started in the 1990s as a joint, non-profit initiative among all disability organisations in Sweden. The knowledge, staff and technology of the non-profit was turned into a privately owned company in 2000. Today, Funka is market leader in the field of accessibility and enjoys a close relationship to end user organisations, ensuring a unique level of quality control.



#### **SYNTHESIS Center for Research & Education**

SYNTHESIS Center for Research and Education is a pioneering organisation which initiates and implements projects of social impact, with a focus on social inclusion and integration of people with fewer opportunities. SYNTHESIS is the leading organisation in Cyprus in the fields of social entrepreneurship and social innovation.



### **TU Dortmund University**

TUD participates in the project with the Department of Technology in Rehabilitation, which is part of the research cluster Technology, Inclusion, Participation. Research and teaching focus on new technologies, digitalization processes, assistive technologies and accessibility and their use to support people with disabilities.

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