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AN INVENTORY OF CRITICAL POINTS FOR DISCUSSION:

Proposed U.S. Federal legislation to be based on the "Federal Policy Blueprint" as presented by the U.S. Carbon Capture Coalition re 45Q

EXECUTIVE SUMMARY: Six categories of engagement relative to this Blueprint need addressing to develop an economically, socially and engineering-wise level of practicability whilst meeting the Blueprint's objectives:

A) jurisprudential so as to prevent the U.S. power plant industry being leveraged "outside the box" by IPCC policy-based strategies into a form of global I.G. Farben 2.0

B) reviewing real-world factors respecting U.S. power plant construction practice & project financing especially as it relates to tax-free loans called tax credits

C) providing alternatives to the unwarranted emphasis of 45Q on strictly pipelines and enhanced oil recovery rather than focusing on true carbon conversion to a non-reactive yet readily marketable group of commercial & industrial products

D) pricing structure guidelines which are non-monopolistic and

E) conclusions respecting the need for reconfiguration of the "Federal Policy Blueprint".

F) Remaining tasks to make of 45Q a fiscally and scientifically credible undertaking

A) Jurisprudential concerns

To put matters respecting the principal concerns of the US Department of Justice's Anti-Trust Division into both attitudinal and procedural context, it helps to read this document first which is entitled "Electricity Restructuring: What Has Worked, What Has Not, and What is Next" by Jeff Lien of the Economic Analysis Group, USDOJ Anti-Trust Division, Document EAG 08-4 dated April 2008. An IT-based social media "template overlay disruptive innovation" new business/governmental partnership structure is not going to fly with the Federal government, a state government, an NGO or a multinational corporation installing 20,000 to 30,000 retrofit or newbuild carbon capture units onto America's power generation facilities. There would already be 3,000 or 4,000 units operational now with the first units up and running in 2004 or so if that were lawfully possible.

To save the reader time, the best way to obtain clearance for 45Q from the U.S. Department of Justice's Anti-Trust Division is to request a formal Business Review by them before any type of CCS/CCUS Federal level regulating policy is proposed. Here is where you request one: https://www.justice.gov/atr/business-reviews

The proposed legislation framework's efficacy in its present form is based upon the wholesale abandonment of the existing laws preventing illegal government competition with the private sector whilst likewise predicated upon engaging in Federally-sponsored price fixing, bid rigging and market allocation. Nowhere is this made more plain than in noting the gross disparity between the commodity CO2 price index for May 2019 pegged by the

St. Louis Federal Reserve bank's FRED indexing service at $355.40/metric tonne put against the price at which a carbon dioxide offset is offered for sale which typically is pegged at as low as 20 cents per metric tonne.

The risk of the Federal Policy Blueprint morphing into a dictatorial commissariat as it is currently written is very high as it will be difficult for this policy to function on any other level than as a functional monopoly. For guidelines on how to identify how monopolies work, please refer to the online document as supplied by the USDOJ's Anti-Trust Division:

https://www.justice.gov/atr/herfindahl-hirschman-index

The overt expression of the management mechanism for enforcing this proposed strategy likewise predicates its effectuality upon mandatory vertical integration, again at the behest of and managed by the U.S. Federal government. It therefore risks being nullified by the Supreme Court as unconstitutional for the same reasons as was the NIRA (National Industrial Recovery Act) in the 1930's.

The Supreme Court ruled that the NIRA law was void for vagueness because of the critical term "fair competition"[53] was nowhere defined in the Act.[54] Second, Hughes found the Act's delegation of authority to the executive branch unconstitutionally overbroad.

https://en.wikipedia.org/wiki/National_Industrial_Recovery_Act_of_1933

It is also useful to refer to the original paradigm of unlawful vertical integration in the form of Carnegie Steel's original iron and gas processing mill complexes which also incorporated "recovery of waste gases" using the off-gases from its onsite production of coke (which is essential for steel production) from Carnegie Steel coal processing plants to light with gas the City of Pittsburgh. Carnegie Steel then collected gas lighting bill payments from consumer and industry alike. There is no difference between that and using captured carbon from power plants to make chemical products in principle, but more importantly, a Federal agency functioning as one economic unit serving as a combined marketing and regulatory axle for the spokes of a wheel of individual carbon suppliers violates anti-trust rules.

Even and especially Henry Ford's original River Rouge "iron ore in, automobiles out" manufacturing facility was required to pay and paid special attention to not crossing the line into vertical integration territory and thus triggering Sherman Antitrust Act-motivated actions by the US Department of Justice's Anti-Trust Division.

For reference purposes, please consult the following online documents:

Vertical Mergers and Merger Enforcement

https://www.justice.gov/atr/merger-enforcement

An alternative and legally-acceptable structure for the enabling process of the Federal Policy Blueprint may be the horizontal merger. Please review the following online documents for a description of how horizontal mergers work.

Modernizing the Merger Review Process

https://www.justice.gov/opa/speech/file/1096326/download

Horizontal Merger Guidelines

https://www.justice.gov/atr/file/810276/download

It should be emphasized that there is no obstacle to setting up individual franchises based on establishing independent CCS/CCUS modules with oversight provided by the licensor of the said franchise independent licensees localized to each CCS/CCUS client power plant's

service region. In dealing with municipal waste management, this marketing and operations strategy has a very well-established and profitable precedent which exists without benefit of government subsidies.

To reiterate, the major operational obstacle from a physical plant point of view is that the Federal Policy Blueprint indicates that the Federal government shall have control of the CCS/CCUS equipment which is in physical reality one of the principal control parameters for the day-to-day operation of the power plant itself. To set up business according to the Federal Policy Blueprint is to make of every thermal power station in the U.S. electrical grid a metaphorical automobile with two steering wheels and two drivers: the power plant and the onsite Federally-controlled CCS/CCUS service provider.

For an astute and useful article concerning how adding a gas capture and processing module installation is conducted on a "bump-free" basis to a working and uninterruptible refinery process, please refer to the following article:

https://www.hydrocarbonprocessing.com/magazine/2018/april-2018/process-optimization/enhancing-refinery-profitability-with-a-novel-offgas-conversion-technology

The only way this proposed plan is going to work is with all of the CCS/CCUS equipment "outside the fence" and owned and operated by an independent subcontract service supplier or suppliers who are instantly responsive to fluctuations and interruptions in the main powerplant's operational cycle. This in and of itself is another legal quagmire.

Other potential legal morasses inherent in the proposed policy include the reality that this Federal centrally-directed commissariat as currently offered oversteps existing Federal law not only through violating current CFTC, international and Federal Reserve rules governing physical commodity price indexing "significant price discovery" or SPD which is the only lawful basis for "pegging" price indeces but also serves as the thin edge of the wedge for reducing the present U.S. chemical manufacturing and hydrocarbon processing industries to a new incarnation of I.G. Farben but under the direction of the IPCC. It is not the Federal government's mandate nor charter to fix pricing except in wartime and then only by Executive Order nor is it the Federal government's charter to delegate its regulatory duties to a foreign government.

Unless it is wartime, there will never be a day when the U.S. Federal government will be authorized to fix commodity pricing *a priori* to bend the market in response to their taxation planning shortfalls or to punish industry for its success. As with everything else, a defensible case for justifying a pricing structure has to be made lawfully in order for the U.S. Federal government to enforce it.

Commodity pricing pegged artificially either on a command economy-style "dartboard" or on a market-constraining basis renders this strategy easily exploitable which is why to do so violates Federal CFTC and US Justice Department anti-trust regulations. These considerations are apart from potential and inevitable accusations of such a proposed policy facilitating and actually executing market allocation schemes, price fixing and bid rigging.

For reference purposes, please consult the USDOJ's online publication "Price Fixing, Bid Rigging, and Market Allocation Schemes: What They Are and What to Look For"
https://www.justice.gov/atr/price-fixing-bid-rigging-and-market-allocation-scheme

The proposed carbon policy legislation mirrors the thankfully ill-fated attempt earlier on in the 21st century of the Joint System Planning Committee to impose billions in costs for new electric distribution systems to support their 20/20 wind power program (20% wind power by 2020) by bureaucratic fiat on the entire Eastern seaboard all the way to the Midwest while grossly violating individual state-level Independent System Operators' authority and the Federal and state laws governing the powers of eminent domain. The U.S. Department of Justice's Anti-Trust Division regulations make crystal clear what dismal fate

awaits combinatorial manipulators of the present free market.

Please see Table 2 page 9 of this document to grasp the size and scope of this "outside-the-box template overlay" of proposed new wind power-related transmission trunklines which construction costs would have bankrupted a huge sector of the US electric power industry whilst parasitically centralizing political control of that grid without recourse:

https://legalectric.org/f/2013/07/JCSP_Report_Volume_2.pdf

The authors of the Federal Policy Blueprint need also to recognize that there are already two highly competent and experienced Federal agencies which by charter and by law are responsible for the Federal Policy Blueprint concerns: the EPA and the Federal Energy Regulatory Commission. As well, in all of the 50 states & all U.S. dependent U.S. territories, there are both environmental and utility regulatory agencies. Another "template overlay" is both redundant and unnecessary as well as a Constitutional violation of the charter of responsibilities delegated to the States & Territories.

Remedies to the above include meeting due diligence requirements which by law must be executed by granting each U.S. State its longstanding Constitutional prerogative to choose or not to choose implementation of the proposed Federal policy as submitted by the Carbon Capture Coalition in consultation with each State's constituent governments, firms and individuals to be affected by this policy. That consultation process must be conducted as utility regulation on this level is the express charter of individual state utility regulators in compliance with FERC and EPA regulations.

Regarding international law and the sovereignty of nations, the Federal Policy Blueprint re Q45 also very much emulates how I.G. Farben took control of all chemical industries in the nations Germany invaded and subjugated during the years 1939 to 1945 in terms of relegating foreign control of a critical U.S. domestic government responsibility and critical U.S. private-sector enterprise category, in this instance, to the IPCC. The Third Reich's incentive for cooperation beside sheer brute force was the sweetener of tax breaks to the defeated nations' chemical industries.

As to the doors to corruption such management practice can open, in the case of I.G. Farben, using Standard Oil of New Jersey patents respecting coal pyrolysis-related Fischer-Tropsch process design and paying royalties for usage to Standard via the Gasification Company based in Belgium from 1938 until the end of the Second World War, I.G. Farben extended that conflict by several years through sub rosa interlocking technology-sharing and market-allocation agreements with the United States under provisions of FDR's Executive Order 8389 conditionally amending the Trading With The Enemy Act. Please see "Trading With The Enemy" by Charles Higham.

In my opinion the Federal Policy Blueprint, using commodity carbon dioxide marketing regulation, global price-fixing and contractual agreements as the levers (with Q45 as the thin edge of the wedge), will force the U.S. hydrocarbon processing industry to comply with cynical and sovereignty-crushing IPCC gameplay rules and thus be subjugated exclusively for the benefit of EU industrial interests.

Please see "The Crime And Punishment of I.G. Farben" by Joseph Borkin and "Industry and Ideology: I.G. Farben During The Nazi Era" by Peter Hayes, as well as Ladislas Farago's vastly entertaining and primary-sourced "The Game of the Foxes."

If the reader of this document believes the above is unduly alarmist, it is useful to note that this has happened twice in American history. The first event of this nature took place in suburban Detroit's Downriver District, America's first "Silicon Valley" but with steel refining integrated with chemical manufacture which functioned de facto as a single economic unit. This included the communities of, from north to south, River Rouge, Ecorse, Wyandotte (home of Wyandotte Chemical—now BASF Wyandotte—and Monsanto), Riverview, and Trenton. This industrial espionage continued from 1920 until 1945 under the

German Army General von Schleicher's direction and was known as the Abwehr.

Through the penetration of the engineering and production communities therein later by Canaris's Abwehr and most effectively after 1938 by Heydrich's and Schellenberg's Allgemeine S.S. Amt V-Ht foreign technical intelligence bureau, every industrial secret was passed on to the Third Reich. This accumulated industrial knowledge was the prototype for designing both I.G. Farben's combined chemical and steel complexes and today's Federal German Republic's three "Chempark" complexes (which to be fair, all now comply with European anti-trust regulations and have for over 70 years, the proof being that all three Chemparks each have more than 500 independent suppliers of goods & services which in turn compete with each other for their fair share of the Chemparks' business). The second event of this type is ongoing now as part of a hauntingly similar battle of wits in America's present Silicon Valley.

To provide a tip-of-the-iceberg sample of the massive extent to which fascist intelligence activities looted Detroit's industrial knowhow within the context of that era's American *Zeitgeist*, here are links to Dr. Sase's two-part article on Nazi espionage in the Motor City during the dark days of the Third Reich to provide insight into how foreign governments sought and still seek control over American industrial assets for the sake of their own enrichment as leverage to achieving ideological and political dominance:

www.saseassociates.com/images/**Treason_in_Detroit**_r_Pt_1.pdf

http://www.legalnews.com/detroit/1375988/

The above section is provided in loving memory of Technical Sergeant Richard Oppegard, U.S. Army Counterintelligence Corps, Military intelligence Service Section, Senator Nancy Kassenbaum, Federal field agent and case officer Ron Garibetto, and two exemplary American immigrants and former engineering slaves of the Third Reich Mr. Sigfried Keuther and Mr. Heinrich von Wimmersperg.

B) design, costing, permitting, construction "build" timelines, workforce size, training, permitting and routing of pipelines, cash requirements & financing et al.

From my review of the Carbon Capture Coalition's membership, it seems incomprehensible to me that the Edison Electric Institute, the American Public Power Association, the U.S. Energy Association, the U.S. Army Corps of Engineers to address water supply and waterway-related issues, the American Gas Association, the American Institute of Chemical Engineers, the National Board of Piping and Pressure Vessel Inspectors, the American Society of Mechanical Engineers, the Federal Energy Regulatory Commission, the American Petroleum Institute, the DOE's National Energy Technology Laboratory, the American Fuel and Petrochemicals Manufacturers, and the various firms which actually build and operate acid-gas removal modules (which are in fact of that which carbon capture equipment consists with minor modifications) such as ProTek and UOP are all excluded from membership.

These firms, trade associations and agencies are not an ominous and ruthless cabal of predatory 1890's Robber Barons out to fleece an innocent public of their hard-earned money whilst deliberately destroying the environment for their own amusement. Nor are the various state Independent System Operators or ISO's who are apparently "disinvited" to the table as well.

All of the excluded with few exceptions above are to be the actual facilitators, operators and/or regulators of any and all carbon capture equipment. They are needed as participants during the policy planning phase as the private-sector firms will finance and carry the cost of setting up carbon capture equipment and ancillary structure, including marketing implementation. They also will be required to determine the following before a single

welding torch is lit for the conduct of piping for these CCS/CCUS projects:

1. Design
2. Costing
3. Permitting
4. Construction "build" timelines
5. Workforce size & type requirements
6. Training needs for operations staff
7. Cash requirements & financing
8. Carbon capture & storage module siting, pipeline routing and surveying
9. Procurement and purchase of rights of way
10. Market size, assessment and sales contract structuring

Just as electric utilities operate our electrical grid through distribution management and demand matching to ensure our lighting does not flicker, so can the above firms and associations provide the expertise in practical flow systems management they have acquired over the past 150 years to keep utilization of commodity carbon dioxide sales, marketing and fulfillment as smooth and bump-free as possible. That capability is above all else what makes carbon capture and utilization bankable, self-financing and taxpayer subsidy-free.

C) very large market placements for industrial-grade commodity carbon dioxide

Concrete additive

http://www.carboncure.com

Water purification through pH balancing

https://www.praxair.com/industries/water-and-wastewater-treatment/ph-control

Fischer-Tropsch reforming process-derived product manufacturing

https://www.uop.com/products/catalysts/reforming/

https://en.wikipedia.org/wiki/Fischer%E2%80%93Tropsch_process

https://www.linde-engineering.com/en/process_plants/hydrogen_and_synthesis_gas_plants/index.html

https://www.linde-engineering.com/en/innovations/flex-asu/index.html

Precision horticulture

https://agfundernews.com/what-is-precision-agriculture.html

https://www.ishs.org/

Electric arc furnaces, as CO2 + steam used in iron reduction as well as steel and aluminum recycling functions as supplemental fuel which carbon then is sequestered in the metal. In basic oxygen furnaces, this supplemental fuel method works as well to control slag formation and to control fuel consumption economics:

https://steelnet.org/who-we-are/sma-history/

https://www.steelsustainability.org

https://www.aluminum.org/industries/production/primary-production

https://www.steel.org/

https://steeluniversity.org/learn/3d-interactive-models/bos/

D) Pricing structure guidelines which are non-monopolistic

The only agency in the Federal government licensed and chartered to post a price index of commodity carbon dioxide is the FRED system of the U.S. Federal Reserve Bank in St. Louis. This is because they use CFTC-approved methods of SPD (Significant Price Discovery) according to present very strict and time-tested guidelines.

https://fred.stlouisfed.org/series/WPU06790302

Why this cannot be used as a price index pointblank and overall is because actual industrial price points are contingent upon the quality and purity of the product supplied.

The ideal scenario would be to make a case for the FRED to develop a set of pricing indeces which correspond to individual grades of commodity carbon dioxide quality based on SPD for the market, not the Federal government, to enforce.

In all cases but the above, no government agency without direct approval of Congress is authorized nor will be authorized to impose levies or fashionably renamed forms of taxation on either a private individual or a corporation.

E) Conclusions

With the above associations onboard and onside with the existing Carbon Capture Coalition team, a detailed and comprehensive market survey for captured commodity carbon dioxide needs in the industrial sector then can be metricated and quantified accurately. As well, those associations excluded at present are the sole repositories of the expertise, experience and research needed to make this national effort a success: conversely, to dictate to rather than participating with the above listed associations will result in the usual government-sponsored protection racket tactics used to extort punitive revenues from utility enterprises and industries which typically operate on a net margin of less than 2 to 3% after the shareholders and taxes are paid.

The ethical obligation of such a program as the Carbon Capture Coalition proposes is entirely contingent on proving that such a subsidy-free market exists through detailed and tangible proof before a dime of taxpayer money is spent on design, construction and implementation. Otherwise the U.S. taxpayer is doomed to throwing their hard-earned tax dollars on this presently nebulous and directionless Babylon tower of bureaucratic feather-nesting forever. This is first and foremost an engineering and chemical concern to be solved by engineers and chemists and by those who pay them: the market.

Worst of all, no power plant utility or industry will buy into the Federal Policy Blueprint solely on the basis of tax incentives AKA interest-free loans or subsidies which punish the taxpayer. The only incentive needed to move forward is for the proposed policy to make economic sense. No lender will finance a process which is uneconomic from the start.

At the present juncture, the carbon capture advocacy community can neither confirm nor deny whether present industrial customers can absorb the present level of carbon dioxide emissions as they have no clear grasp of how reliant the industrial sector is on commodity carbon dioxide. No one has ever conducted a proper market survey in depth. This re-

quires visiting refineries first and foremost, as nearly all have for-purpose engineered carbon dioxide generators onsite for process usage.

F) Remaining tasks

From an engineering and scientific point of view, two other uncomfortable yet necessary tasks need to be performed before any of the above goes forward:

The greenhouse effect has to be proven to exist in a controlled laboratory environment under strictly enforced and standards-compliant experimental conditions. This, usefully enough, is a very straightforward and relatively simple task as the United States Federal government owns and maintains many atmospheric simulation chambers which function as primarily test cells for aerospace vehicles and hardware, both public and private.

Here is a list of several large atmospheric simulation chambers which are available for civilian research and testing applications:

https://www1.grc.nasa.gov/facilities/sec/#using-our-facilities

https://www.nts.com/services/testing/environmental/space-simulation/

https://apps.dtic.mil/dtic/tr/fulltext/u2/1000521.pdf

https://www.arnold.af.mil/Units/Test-Division/

The second task is somewhat more complex but soluble: how to draw the causal link which may exist between the greenhouse effect—if it exists—and the influence of anthropogenic carbon dioxide on upper-atmosphere chemistry and how both create specific weather events.

One can state that the flutter of a butterfly's wing in Nigeria can generate a fractal that causes a hurricane in the Gulf of Mexico but any commercial airline pilot would reply that if such an event occurred, the growth of turbulence between Nigeria and the Gulf of Mexico would show up on his aircraft's turbulence sensing radar. Were he yet alive, Professor Ilya Prigogine who won the Nobel Prize in 1977 for his work in chaos theory would state "Prove it."

How this can be crafted according to generally-accepted experimental principles is through applying and building on existing principles of computational compressible-fluid dynamics. Here is a library of free know-how in that discipline:

https://www.intechopen.com/search?term=computational%20fluid%20dynamics%20weather

From there, the dynamic of forming cause-and-effect linkages between weather events and their points of initiation (which also have to take into consideration Earth's gravitational waves which are the drivers of all wind) has to metricated. This is a problem of a specific category known as "semantic logic." Intechopen has a solid library addressing state-of-the-art development in this arena.

https://www.intechopen.com/search?term=semantic%20logic

With the development of a strict and empirically defensible methodology for describing the relationship between the butterfly's wing and the formation of hurricanes and, most importantly, where those resultant weather events occur owing to a specific anthropogenic carbon dioxide source, then shall a straightforward method for litigating such cases for suing for damages in a court of law be made, thus avoiding the embarrassment experienced by the plaintiffs in pursuing a class-action lawsuit against the energy majors and the utilities in reference to Hurricane Katrina.

My personal recommended "dream team" members to take on the above challenges are

Professor Kulikov:

https://ui.adsabs.harvard.edu/abs/2019ApJS..243....4K/abstract
https://arxiv.org/abs/1812.04321
https://arxiv.org/abs/1812.05873
https://arxiv.org/abs/1812.03287
https://ui.adsabs.harvard.edu/abs/1985RaF....28...11K/abstract

Professor Prettyman:

https://arxiv.org/abs/1705.05556
https://arxiv.org/abs/1601.03713
https://arxiv.org/abs/1401.6152

Professor Langlands' massive army of faithful mathematical acolytes:

https://arxiv.org/abs/1907.08562
https://arxiv.org/abs/1904.10491
https://arxiv.org/abs/1812.11879

Professor Zelmanov:
https://arxiv.org/abs/1907.01777
https://arxiv.org/abs/1707.06614
https://arxiv.org/abs/1703.08733

Professor Branover:
http://mhd.sal.lv/authors/Branover_H.html

Dr. Rachel Rosen:
https://arxiv.org/abs/1507.06705
https://arxiv.org/abs/1403.6509
https://arxiv.org/abs/1307.0517

Two different and unrelated Professor Bishops to build the needed predictive Granger causality chains which (to my knowledge) for some odd reason are primarily used only in economic and marketing research:

https://tind-customer-agecon.s3.amazonaws.com/93e9350d-3c38-43b8-896c-6ccac9e177e8?response-content-disposition=inline%3B%20filename%2A%3DUTF-8%27%272Bishop_31_4.pdf&response-content-type=application%2Fpdf&AWSAccessKeyId=AKIAXL7W7Q3XHXDVDQYS&Expires=1564571625&Signature=GxpLXoaEBuuABLAPkCzirW14kgM%3D

https://arxiv.org/abs/quant-ph/0210058

Professor Ilya Prigogine's lifelong labors as respects chaos theory seems to have fallen out of fashion academically but it is worth the time to take a look at what it might contribute to sorting out how climates and the weather work. A large portion of the complete answer for forming a proof-based climatological model resides there, to include validating the model's baseline calibration mechanism which IMO is the whole ball game.

This team structure is chosen based on the principle that what constitutes the behavior and causative elements of weather phenomena is a simultaneous intersection of solar radiation, stellar radiation (for instance, muons are a form of cosmic radiation created by distant supernovae which create clouds in our atmosphere), gravity waves and related magnetohydrodynamic phenomena to include resonant frequencies not limited only to Earth.

The two tasks given above need doing if for no other reason than to save climate alarmists and their backers the horror of their grandchildren ultimately bearing the humiliation of their ancestors having supported what has the potential to be remembered as the silliest cosmological construct since the creation of that group of theories as promulgated by Madame Blavatsky, Schopenhauer, von List and Jörg Lanz von Liebenfels during the 19th and early 20th century.

In the meantime, industrial-grade commodity carbon dioxide is a good investment, especially if it is being used in a manner which furthers making of our environment and most importantly, our quality of life, a better proposition. This holds true whether or not the anthropogenic global warming mechanism is true or false.

It costs $20.00 to $30.00 per metric tonne to capture CO2 stack emissions and from $60.00 to $150.00 less your margin per metric tonne in post-capture processing to make of CO2 suitably standards-compliant for chemical, pharma and food grade processing. The spot price on the FRED for this commodity is pegged at almost $360.00 less your margin. So do the math. Life is good.

Hoax or reality, there is good money to be made in the commodity carbon dioxide capture-to-process industrial gas industry. Play by the rules and every day is a nice day if you invest the elbow grease to get the job done right. Q45 is not necessary to achieve that happy state of affairs.

Respectfully submitted,
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