



Legislation Details (With Text)

File #: Ord 21-65 **Version:** 1

Type: Ordinance **Status:** Passed

In control: City Council

Final action: 12/22/2021

Title: Amending Chapter 310.18 of the Legislative Code pertaining to Uniform License Procedures as it relates to License Fee Schedule.

Sponsors: Amy Brendmoen

Indexes: Budget, License, Ward - all

Code sections:

Attachments:

Date	Ver.	Action By	Action	Result
12/28/2021	1	Mayor's Office	Signed	
12/22/2021	1	City Council	Adopted	Pass
12/15/2021	1	City Council	Laid Over to Final Adoption	Pass
12/8/2021	1	City Council	Laid Over to Second Reading	

Amending Chapter 310.18 of the Legislative Code pertaining to Uniform License Procedures as it relates to License Fee Schedule.

SECTION 1

WHEREAS, in support of Mayor Carter's 2022 budget, the Department of Safety and Inspections (DSI) seeks to increase all building permit, plan review, and business licensing fees by 1.5%; and

WHEREAS, Chapter 310.18 of the Saint Paul Legislative Code (SPLC) contains the fee schedules for business licenses and certain permits; and

WHEREAS, the fee increases proposed more accurately reflect the cost of providing licenses, permits and related services; and

WHEREAS, DSI continues to experience substantial growth in personnel costs such as health care and wages; and

WHEREAS, General Fund pressures create the need to decrease the gap between licensing fee revenue and program expenses. Now, therefore be it

RESOLVED, that the Council of the City of Saint Paul does hereby ordain:

SECTION 2

Section 310.18 of the Saint Paul Legislative Code is hereby amended to read as follows:

Sec. 310.18. - License fee schedule.

Notwithstanding the provision of any other ordinance or law to the contrary, the following fees are hereby provided for all the licenses listed herein. These fees supersede all inconsistent provisions, including, but not limited to, graduated fee provisions, in these chapters and in other ordinances and laws, and include the fee for the license application as part of the license fee; provided, however, that this section does not amend or modify sections 310.09(a) or 310.09(d) of the Legislative Code with respect to exempt organizations or late fees. Pursuant to section 310.09(b) of the Legislative Code, these schedules shall be posted in the office of the director. These fees shall be effective for license renewals and new license applications occurring on and after January 1, 1995, or on the effective date of this section, whichever is later; provided, however, that with respect to all licenses whose renewal dates occur after the effective date of this new schedule, there shall be no increases in, nor offsets or refunds of, the existing fees paid, or due and owing.

(a) ENFORCEMENT LEVEL 1

<u>Chapter/Section</u>	<u>License Description</u>	<u>Fee</u>
<u>No.</u>		
165	Agricultural Vehicle Parking Permit	\$ 20.00
<u>\$ 21.00</u>		
316.02	Animal Foods Manufacturing and Distribution	78.00
<u>79.00</u>		
317.01	Amusement Rides	78.00 79.00
323.02	Christmas Tree Sales	78.00 79.00
325.02	Close Out Sale	78.00 79.00
327.03	Laundry Dry Cleaning Pickup Station	
78.00	<u>79.00</u>	
332.03	Liquid Fuel Vehicle	
78.00	<u>79.00</u>	
333.03	Solid Fuel Vehicle	
78.00	<u>79.00</u>	
340.04	Mercantile Broker	
78.00	<u>79.00</u>	
345.04	Peddler (Solicitor/Transient)	
78.00	<u>79.00</u>	
346.03	Mobile Retail Vehicle	
78.00	<u>79.00</u>	
348.01	Animal Day Care	
76.00	<u>77.00</u>	
348.01	Animal Boarding	
76.00	<u>77.00</u>	
350.02	Rental of Hospital Equipment	
78.00	<u>79.00</u>	
350.02	Rental of Hospital Equipment Vehicle	
78.00	<u>79.00</u>	
351.03	Rental of Kitchenware	
78.00	<u>79.00</u>	
353.02	Roller Rinks	
78.00	<u>79.00</u>	
355.02	Secondhand Dealer-Single Location	
78.00	<u>79.00</u>	
357.03	Solid Waste Hauler-Each Vehicle Over One	
78.00	<u>79.00</u>	
359.03	Sound Trucks and Broadcast Vehicles	
78.00	<u>79.00</u>	
371.02	Finishing Shop	
78.00	<u>79.00</u>	

361.01		Tow Truck/Wrecker Vehicle
78.00	<u>79.00</u>	
362.02		Tree Trimmer-Additional Vehicle
78.00	<u>79.00</u>	
372.02		Tire Recapping Plant
78.00	<u>79.00</u>	
377.03		Lawn Fertilizer and Pesticide Application
78.00	<u>79.00</u>	
382.03		Pet Grooming Facility
78.00	<u>79.00</u>	
409.05(b),		Liquor-Outdoor Service Area (Patio)
78.00	<u>79.00</u>	
410.07(c)		
424.02		Gas Stations
402.00	<u>104.00</u>	

(b) ENFORCEMENT LEVEL 2

<u>Chapter/Section</u>	<u>License Description</u>	<u>Fee</u>
<u>No.</u>		
320.03	Bituminous Contractor	
\$ 191.00		<u>\$ 194.00</u>
322.02(a)	Pool Halls	
191.00		<u>194.00</u>
322.02(b)	Bowling Centers	
191.00		<u>194.00</u>
326.06	Building Contractors	
191.00		<u>194.00</u>
327.03	Laundry/ Dry Cleaning Plants	
191.00		<u>194.00</u>
332.03	Fuel Dealers-Liquid	
191.00		<u>194.00</u>
333.03	Fuel Dealers-Solid	
191.00		<u>194.00</u>
334.03	Pest Control	
191.00		<u>194.00</u>
338.02	House Sewer Contractors	
191.00		<u>194.00</u>
342.02	Bulk Oil Storage	
191.00		<u>194.00</u>
347.03	Pet Shop	
191.00		<u>194.00</u>
352.03	Rental of Trailers	
191.00		<u>194.00</u>
355.02	Secondhand Dealer-Exhibitions	
191.00		<u>194.00</u>
356.02	Sidewalk Contractors	
191.00		<u>194.00</u>
362.02	Tree Trimming (with One Vehicle)	
191.00		<u>194.00</u>
364.02	Veterinary Hospital	
191.00		<u>194.00</u>
365.02	Window Cleaning	

191.00	<u>194.00</u>	
401.02		Motorcycle Dealer
191.00	<u>194.00</u>	
405.02		Dance or Rental Hall
293.00	<u>297.00</u>	
406.04		Game Room
191.00	<u>194.00</u>	
408.03		Recycling Collection Center
191.00	<u>194.00</u>	
415.04		Theaters and Movie Theaters
191.00	<u>194.00</u>	
416.03		Motion Picture Drive-in Theater
191.00	<u>194.00</u>	
426.04		Cabaret (Class A and B)
191.00	<u>194.00</u>	

(c) ENFORCEMENT LEVEL 3

<u>Chapter/Section</u>	<u>License Description</u>	<u>Fee</u>
<u>No.</u>		
225.04(a)	Firearms	
\$ 369.00	<u>375.00</u>	
324.04	Cigarettes	488.00 <u>495.00</u>
354.02	Sanitary Disposal Vehicle	
369.00	<u>375.00</u>	
355.02	Secondhand Dealer-Multiple Dealers	
369.00	<u>375.00</u>	
357.03	Solid Waste Hauler and Vehicle	
369.00	<u>375.00</u>	
360.03	Public Swimming Pools	
369.00	<u>375.00</u>	
360.03	Whirlpools	
369.00	<u>375.00</u>	
361.13	Tow Truck/Wrecker Operator	
369.00	<u>375.00</u>	
383.03	Vehicle Immobilization Service	
369.00	<u>375.00</u>	
376.04	Taxicabs	
428.00	<u>434.00</u>	
376.05	Taxicabs (Reciprocity Event)	
33.00	<u>34.00</u>	
379.02	Short-term Rental Platform License	
10,200.00	<u>10,353.00</u>	
379.02	Short-term Rental Host License	
41.00	<u>42.00</u>	
381.02(d)	Currency Exchanges	
369.00	<u>375.00</u>	
401.02	New Motor Vehicle Dealer	
369.00	<u>375.00</u>	
401.02	Secondhand Dealer Motor Vehicle Parts	
462.00	<u>469.00</u>	
401.02	Secondhand Motor Vehicle Dealer	
462.00	<u>469.00</u>	

407.03		Hotel/Motel-To 50 rooms	
369.00	<u>375.00</u>		
407.03		Hotel-Each additional room over 50	
12.00	<u>13.00</u>		
409.07.1(a), 410.04(c)		Liquor-Extension of Service Hours	
369.00	<u>375.00</u>		
412A.03		Massage Center-Adult	
369.00	<u>375.00</u>		
412A.03		Environmental Plan Review Massage CenterAdult	407.00
413.00			
413.04		Conversation/Rap Parlor (A and B)	
369.00	<u>375.00</u>		
415.04		Mini-Motion Picture Theater-Adult	
369.00	<u>375.00</u>		
417.04		Parking Lots and Parking Garages	
369.00	<u>375.00</u>		
417.04		Parking Garages (Government)	
0.00			
417.04		Parking Garages (Private)	
362.00	<u>367.00</u>		
422.02		Motor Vehicle Salvage Dealer	
369.00	<u>375.00</u>		
423.02(b)		Auto Body Repair Garage	
462.00	<u>469.00</u>		
423.02(a)		Auto Repair Garage	
462.00	<u>469.00</u>		
427.04		Health/Sports Clubs	
369.00	<u>375.00</u>		
427A.04		Health/Sports Club (Adult)	
369.00	<u>375.00</u>		
428.04		Steam Room/Bath House (Class A and B)	
369.00	<u>375.00</u>		
423.02(b)		Auto Body Repair/Painting Shop	
462.00	<u>469.00</u>		

d) ENFORCEMENT LEVEL 4

<u>Chapter/Section</u> <u>No.</u>	<u>License Description</u>	<u>Fee</u>	
331A.04	Catering-Limited	\$ 326.00	
331A.04	Environmental Plan Review-Catering-Limited		380.00
331A.04	Catering	570.00	
331A.04	Environmental Plan Review-Catering		625.00
331A.04	Catering-Add on	250.00	
331A.04	Environmental Plan Review-Catering-Add on		380.00
331A.04	Customer Appreciation-Food Sales		55.00
331A.04	Day Care Food	109.00	
331A.04	Food Give-Away	55.00	
331A.04	Food Processing/Packaging/Distributing		217.00
331A.04	Environmental Plan Review-Food Processing/ Packaging/Distributing	380.00	
331A.04	Food Vehicle	92.00	

331A.04; 363.02(a)	Food Vending Machine	16.00	
331A.04: 363.02(a)	Food Vending Machine Operator		136.00
331A.04	Food/Boarding Facility	353.00	
331A.04	Environmental Plan Review-		
	Food/Boarding Facility	380.00	
331A.04	K-12 School Food Service	217.00	
331A.04	Environmental Plan Review -		
	K-12 School Food Service	272.00	
331A.04	K-12 School Food Service-Limited		109.00
331A.04	Environmental Plan Review-K-12		
	School Food Service-Limited	136.00	
331A.04	Mobile Food Vehicle	244.00	
331A.04	Mobile Food Cart-Limited	110.00	
331A.04	Mobile Food Cart-Full	217.00	
331A.04	Environmental Plan Review-Restaurant (1)		381.00
331A.04	Environmental Plan Review-Restaurant (2)		381.00
331A.04	Environmental Plan Review-Restaurant (3)		625.00
331A.04	Environmental Plan Review-Restaurant (4)		625.00
331A.04	Environmental Plan Review-Restaurant (5)		625.00
331A.04	Restaurant (D)-Add-On	272.00	
331A.04	Environmental Plan Review Restaurant (D)		
	Add-On	381.00	
331A.04	Restaurant (D)-Add-on (Bar Only)		109.00
331A.04	Environmental Plan Review Restaurant (D)		
	Add-On (Bar Only)	190.00	
331A.04	Restaurant (E)-Extension	164.00	
331A.04	Environmental Plan Review-Restaurant (E)-		
	Extension	136.00	
331A.04	Environmental Plan Review-Restaurant (L)-		
	Limited	381.00	
331A.04	Restaurant (L)-Limited	272.00	
331A.04	Restaurant (1)-no seats	435.00	
331A.04	Restaurant (2)-1-12	478.00	
331A.04	Restaurant (3)-13-50	580.00	
331A.04	Restaurant (4)-51-150	631.00	
331A.04	Restaurant (5)- 151 and over	673.00	
331A.04	Retail Food Establishment (A)-1 to 100 Sq. Ft.		82.00
331A.04	Environmental Plan Review-		
	Retail Food Establishment (A)	36.00	
331A.04	Retail Food Establishment (B)-		
	101 to 1000 Sq. Ft.	109.00	
331A.04	Environmental Plan Review		
	Retail Food Establishment (B)	272.00	
331A.04	Retail Food Establishment (C)-		
	1001 to 3000 Sq. Ft.	408.00	
331A.04	Environmental Plan Review Retail		
	Food Establishment (C)	408.00	
331A.04	Retail Food Establishment (D)-		
	3001 to 6000 Sq. Ft.	652.00	
331A.04	Environmental Plan Review		
	Retail Food Establishment (D)	516.00	
331A.04	Retail Food Establishment (E)-		
	6001 to 10,000 Sq. Ft.	978.00	

331A.04	Environmental Plan Review		
	Retail Food Establishment (E)	652.00	
331A.04	Retail Food Establishment (F)-		
	over 10,000 Sq. Ft.	1,413.00	
331A.04	Environmental Plan Review		
	Retail Food Establishment (F)	816.00	
331A.04	Retail Food Establishment-Farmers' Market		164.00
331A.04	Retail Food Establishment-Temporary		65.00
331A.04	Retail Food Establishment-Nonprofit		27.00
331A.04	Environmental Plan Review-		
	Retail Food Establishment-Nonprofit	55.00	
331A.04	Retail Food Establishment-Secondary Facility		82.00
331A.04	Environmental Plan Review		
	Retail Food Establishment-Secondary Facility		381.00
331A.04	Retail Food Establishment-		
	Restricted Food Service	79.00	
331A.04	Special Event Food Sales-		
	1 to 3 days (up to 150 sq. feet)	190.00	
331A.04	Special Event Food Sales-		
	4 to 10 days (up to 150 sq. feet)	217.00	
331A.04	Special Event Food Sales-		
	Up to 3 events (up to 150 sq. feet)	217.00	
331A.04	Special Event Food Sales-late fee		
	50% of special event food sales fee		
331A.04	Special Event Food Sales (Nonprofit)		
	(up to 150 sq. feet)	55.00	
331A.04	Special Event Food Sales-Extension		
	(up to 150 sq. feet)	109.00	
331A.04	Special Event Food Sales-Each additional 150 square feet		
	Portion thereof 25% of special event foods sales fee		
331A.04	Special Event Food Sales-		
	Each additional location fee	85.00	
331A.04	Nonprofit 1 Day Special Event-		
	1-10 Stands	275.00	
331A.04	Nonprofit 1 Day Special Event-Each Additional		
	10 Stands or Portion of 10 Stands	275.00	
331A.04	Seasonal Temporary Food Stand		244.00

(e) ENFORCEMENT LEVEL 5

<u>Chapter/Section</u>	<u>License Description</u>	<u>Fee</u>
<u>No.</u>		
409.27	2:00 a.m. closing	
\$ 54.00	<u>\$ 55.00</u>	
409.05(i)	Intoxicating Liquor-Fee waived for government	
	Agencies	0.00
409.01(c)	Liquor Catering Permit-Annual	
175.00	<u>178.00</u>	
409.02	Off-Sale Microdistillery	
187.00	<u>190.00</u>	
409.05(b)	Liquor Catering Permit-Temporary	
54.00	<u>55.00</u>	
409.05(b)	On-Sale-100 seats or less	

4,891.00	<u>4,964.00</u>			
409.05(b)		On-Sale-101-180 seats		
5,416.00	<u>5,497.00</u>			
409.05(b)		On-Sale-181-290 seats		
5,802.00	<u>5,889.00</u>			
409.05(b)		On-Sale-291 or more seats		
5,882.00	<u>5,970.00</u>			
409.05(b)		On-Sale-Theater		
1,746.00	<u>1,772.00</u>			
409.25(b)		Temporary Liquor		
54.00	<u>55.00</u>			
409.05(f)		On-sale Club-Under 200 members		
300.00				
409.05(f)		On-sale Club-201-500 members		
500.00				
409.05(f)		On-sale Club-501-1,000 members		
650.00				
409.05(f)		On-sale Club-1,001-2,000 members		
800.00				
409.05(f)		On-sale Club-2,001-4,000 members		
1,000.00				
409.05(f)		On-sale Club-4,001-6,000 members		
2,000.00				
409.05(f)		On-sale Club-6,000+ members		3,000.00
409.05(h)		Additional family members		
56.00	<u>57.00</u>			
409.02		Brewpub/Off-sale (Growler)		
187.00	<u>190.00</u>			
409.02		Off-Sale Brewery		
187.00	<u>190.00</u>			
409.05	Off-Sale	1,377.00	<u>1,398.00</u>	
409.07(b)(2)	Sunday On-Sale	200.00		
409.11(b),	Extension of Service Area-Temporary		62.00	
63.00				
410.07(a)(8)				
409.15(b)	Wine On-Sale	2,000.00		
409.25	Temporary Wine	54.00	<u>55.00</u>	
409.25	Wine Licenses for Festivals	54.00		<u>55.00</u>
409.15(d)	On-Sale Malt (Strong)	649.00	<u>659.00</u>	
409.28	Brewery Taproom	649.00	<u>659.00</u>	
409.31	Microdistillery Cocktail Room	649.00	<u>659.00</u>	
410.02	On-Sale Malt (3.2)	649.00	<u>659.00</u>	
410.02, 410.11	On-Sale Malt-Fee waived for municipal			
golf courses		0.00		
410.02	Off-Sale Malt	205.00	<u>208.00</u>	
410.10(a)	Temporary Malt	54.00	<u>54.00</u>	
411.03	Entertainment-Class A	253.00	<u>257.00</u>	
411.03	Entertainment-Class B	613.00	<u>622.00</u>	
411.03	Entertainment-Class C	2,911.00	<u>2,955.00</u>	
411.05	Entertainment Temporary	31.00	<u>32.00</u>	
409.08	Live Music Event-18 and Up	31.00	<u>32.00</u>	
409.15(e)	Culinary On-sale	233.00	<u>236.00</u>	
409.01	Private Event-Restaurant/Liquor Caterer		31.00	<u>32.00</u>

(f) ENFORCEMENT LEVEL 6

<u>Chapter/Section</u>	<u>License Description</u>	<u>Fee</u>
<u>No.</u>		
329.02	Alarm Permits	
\$ 39.00		<u>\$ 40.00</u>
317.01	Amusement Rides-Temporary	
29.00		<u>30.00</u>
106.01(b)	Sidewalk Café-Food Only	
36.00		<u>37.00</u>
106.01(b)(4)	Sidewalk Café-Liquor	
36.00		<u>37.00</u>
127.04	Courtesy Benches	
24.00		
127	Courtesy Benches Transfer	
45.00		<u>16.00</u>
293.09	Noise Variance	
175.00		<u>178.00</u>
368.02	Wrecking of Buildings	
59.00		<u>60.00</u>
369.03	Building Trades Business License	
171.00		<u>174.00</u>
370.09	Building Trades Certificates of Competency	
22.00		
370.17	Trade Worker-Tier 1	
33.00		<u>34.00</u>
370.17	Trade Worker-Tier 2	
64.00		<u>65.00</u>
278.03	Gambling Hall	
402.00		<u>412.00</u>
318.02	Mechanical Amusement Device	
19.00		
318.02	Music Machine	
19.00		
318.02	Amusement Rides	
19.00		
318.02	T.V. Units	
19.00		
344.02(a)	Pawn Shops	
2,911.00		<u>2,955.00</u>
344.02(b)	Pawn Shop Billable Transaction Fee	
3.00		
373	Transportation Network Companies	
37,506.00		<u>38,069.00</u>
374.3	Commercial Pedal Car Driver	
46.00		<u>47.00</u>
374.3	Commercial Pedal Car Vehicle	
107.00		<u>109.00</u>
374.3	Commercial Pedal Car Business	
321.00		<u>326.00</u>
375.2(a)	Pedicab Vehicle	
103.00		<u>105.00</u>

375.2(b)		Pedicab Driver
46.00	<u>47.00</u>	
376		Taxicab Vehicle-Duplicate Sticker
19.00		
376		Taxicab Replacement Vehicle Sticker
51.00	<u>52.00</u>	
376.05		Taxicab Driver (Reciprocity Event)
33.00		
376.16(d)		Taxicab Driver (new)
46.00	<u>47.00</u>	
376.16(i)		Taxicab Driver Renewal
46.00	<u>47.00</u>	
376		Taxicab Driver Duplicate Identification Card
6.00		
376.17(d)		Taxicab Driver (provisional)
46.00	<u>47.00</u>	
391.02		Soliciting Funds-Tag Days
24.00		
402.08		Temporary Gambling (3 types)
54.00	<u>55.00</u>	
403.03		Bingo Halls
209.00	<u>212.00</u>	
409.05(g)		Gambling Location
77.00	<u>78.00</u>	
409.08(11)		Modification of Parking
438.00	<u>445.00</u>	
359.03		Sound Trucks and Broadcast Vehicles (Nonprofit Organizations)
29.00		
380.04		Tanning Facility
97.00	<u>98.00</u>	
380.04		Environmental Plan Review Tanning Facility
175.00	<u>178.00</u>	
414.02		Therapeutic Massage Practitioner-One Location
97.00	<u>98.00</u>	
414.02		Therapeutic Massage Practitioner-Each Additional Location
29.00		
412.04		Massage Center (Class A)
239.00	<u>243.00</u>	
412.04		<u>Therapeutic Massage Practitioner-Temporary</u>
45.00	<u>46.00</u>	
412.04		Environmental Plan Review Massage Center (Class A)
431.00	<u>437.00</u>	
412.04		Massage Center (Class B)
97.00	<u>98.00</u>	
412.04		Environmental Plan Review Massage Center (Class B)
175.00	<u>178.00</u>	
357.03		Solid Waste Transfer Station
1,745.00	<u>1,771.00</u>	
408.03		Recycling Processing Center

874.00	<u>887.00</u>		
429.03		Infectious Waste Processing Facility	
1,745.00	<u>1,771.00</u>		
198.04(c)		Keeping of Animal (includes more than	
		three (3) chickens)	<u>76.00</u>
198.04(c)		Keeping of Animal-Renewal	<u>77.00</u>
28.00			
198.04(c)		Tier 1 Chicken Permit	
26.00			
198.04(c)		Tier 1 Chicken Permit Renewal	
15.00	<u>16.00</u>		
198.04(c)		Tier 2 Chicken Permit	
75.00	<u>77.00</u>		
198.04(c)		Tier 2 Chicken Permit Renewal	
20.00	<u>28.00</u>		
198.04(c)		Keeping of More than Three (3) Cats	
75.00	<u>77.00</u>		
198.04(c)		Keeping of More than Three (3) Cats (Renewal)	20.00
28.00			
200.03		Dog License- <u>Annual Altered</u>	
12.00	<u>20.00</u>		
200.03		Dog License- <u>Annual Intact</u>	
58.00	<u>81.00</u>		
200.03		Dog License- <u>Annual Altered Reduced</u>	
10.00			
200.03		Dog License-Lifetime (microchip and altered)	
100.00	<u>142.00</u>		
200.03		Dog License-Reduced Rate, Lifetime	
		(microchip and altered)	
18.00	<u>71.00</u>		
200.03		Dangerous or Potentially Dangerous	
		<u>Declared Animal</u> (microchip and altered)	
140.00	<u>142.00</u>		
		Dangerous or Potentially Dangerous	
200.03		Declared Animal (microchip and unaltered)	
280.00	<u>284.00</u>		
200.04		Dog License-Replacement	
10.00			
200.07		Impounding Fee	
35.00	<u>36.00</u>		
200.02(a)		Unlicensed Dog	
58.00	<u>59.00</u>		
200.121(e)		Dangerous Dog Registration	
300.00	<u>305.00</u>		
200.07		Boarding Fee-Per Day	
19.00			
		Animal Adoption-St. Paul Resident	
50.00	<u>51.00</u>		
		Animal Adoption-Nonresident	<u>228.00</u>
		Rabies Vaccination for impounded dogs, cats, ferrets	<u>30.00</u>
		Microchipping for impounded animals	<u>30.00</u>
		Delinquent License Renewal fee (per month)	<u>5.00</u>
376.17		Taxicab Service Company	416.00
			<u>422.00</u>

SECTION 3

This Ordinance shall take effect and be in force thirty (30) days following its passage, approval, and publication.