# Testimony of the Neighborhood Voices Coalition Committee of the Whole Subcommittee on Redistricting Public Hearing April 7, 2022

My name is John Barlow Weiner, and I am speaking on behalf of the Neighborhood Voices Coalition, a coalition of neighborhood organizations from throughout Ward 3.<sup>1</sup> We appreciate this opportunity to explain our concerns with the Ward map proposed by the Ward 3 Redistricting Task Force and to present our map proposal for addressing them.

#### I. Introduction.

The redistricting process is a strenuous and exacting one as you all well know. However, redistricting for Ward 3 has proven remarkably challenging and needlessly and inappropriately acrimonious. It should go without saying that personal attacks and derision of those participating in the process are simply unacceptable. The Neighborhood Voices coalition has worked to engage in good faith on the merits of how to draw a sound map. The issue for today is to focus on those merits not the messenger, to find a path forward. We hope we can help; we have a map.

Essentially, the Ward's redistricting task force decided to propose more radical changes than necessary and stayed on its course in the face of increasingly strong community calls to change direction. The primary objection was and remains that the task force approach was ignoring a core tenet—to strive to keep neighborhoods intact rather than split them across ANCs.

As you know, the ANC system was created to ensure neighborhoods a voice in DC government affairs, and the residents of those neighborhoods a voice before their neighborhood's ANC. As reflected in DC law and the guidelines for the 2022 redistricting, a core objective is to keep identifiable neighborhoods intact. Redistricting can essentially be seen as an exercise in adjusting SMDs in light of population change, adjusting ANC boundaries if needed, consistent with this core principle.

The Ward 3 Task Force embraced a different core principle, specifically, that ANCs should be configured around major avenues or "corridors," and that population "clusters" should be kept near the center of the ANC, whether such avenues or clusters are, in fact, at the center of actual, existing neighborhoods or not, and regardless of whether a corridor might be important to more than one neighborhood that abuts it.

The Task Force seemed to have its own vision for how it thought the Ward should be configured and what ANCs should look like. It sought to realize that vision, rather than looking at how to draw ANCs to fit actual neighborhoods and ensure their residents can be heard on their shared interests and issues. In an effort to stay on this course (which remains the expressed foundation for its report), the Task Force

<sup>&</sup>lt;sup>1</sup> While the coalition has worked with various other neighborhood organizations in developing its proposals, we list only those who have formally joined the coalition to date. Other organizations have or will be submitting letters of support. Current members are: American University Park Neighbors, Cleveland Park Citizens Association, Cleveland Park Historical Society, Foxhall Community Citizens Association, Glover Park Citizens Association, Neighbors for a Livable Community, Spring Valley Wesley Heights Citizens Association Tenleytown Neighbors Association, and Westover Place Homes Corporation.

ignored recommendations and ever-increasing protest from Ward communities' residents and organizations.

The result of this extraordinary circumstance was an unprecedented coming together of neighborhood organizations from communities across the Ward, to form the Neighborhood Voices coalition, to try to help the task force understand and address the concerns being raised. Despite being presented with a rational alternative map, significant deficiencies remain in the task force's recommended map, splitting neighborhoods and interfering with the ability of communities within the Ward to engage on issues and interests important to them.

Luckily, the solution remains relatively simple, to return the Ward map to a state closer to its current configuration, making adjustments as needed, including to ensure SMDs are compliant and, where possible, improve the alignment between ANC and neighborhood boundaries. As will be explained, this largely means correcting problematic boundaries of the new ANC3A proposed by the Task Force.

#### II. Neighborhood Voices Proposal.

The Neighborhood Voices map presented today proposes a series of reasonable, measured adjustments to address the problems with the task force map. These adjustments are further explained below in sections for each ANC to which we will refer in presenting the map. Some key points:

Making a viable ANC 3A—Keeping neighborhoods intact. While we accept that a new ANC may be appropriate, the process of configuring a new ANC, like the redistricting in general, should be one of restraint, working to keep existing neighborhoods intact and ensuring that residents retain the ability to be heard on their neighborhood's shared issues and interests.

The task force approach unnecessarily splits neighborhoods across ANCs, including at Tenleytown, Cleveland Park, and along Massachusetts Avenue in Wesley Heights/Spring Valley. Most dramatically, the Task Force's proposed ANC 3A, recommends a new SMD 3A05 running north-south for 1.6 miles through much of the center of the Ward, cutting a swath through diverse areas and taking in portions of communities that have little or no relation to each other, splitting residents from neighborhoods of which they are part and with which they share issues and interests.

Nothing in the circumstances of Ward 3 called for pursing such a disruptive approach. Between 2010 and 2020, Ward 3 grew at a significantly slower rate than the rest of the District. According to Census data, more than half of the Ward's population growth in this period is attributed to a surge of young children and teenagers – not an influx of new residents. The Ward's boundaries did not need to change. A radical rethink of its ANCs and SMDs was not demanded. As the Neighborhood Voices map demonstrates, SMDs and ANCs can be drawn for Ward 3 that do not cause such disruption.

The Neighborhood Voices map reconfigures ANC 3A to keep neighborhoods together and also to enable communities with shared interests and issues to be together in the same ANC. This is not only consistent with the principles of the ANC system and of redistricting, but also consistent with overwhelming community input from across the Ward in support of keeping neighborhoods together, not splitting them across ANCs.

Returning American University and Wesley Seminary to their neighborhood. The Task Force also recommends placing American University and Wesley Seminary in ANC 3E rather than 3D, separating them from the Wesley Heights/Spring Valley neighborhood in which they are geographically located. Consistent with community input, including of neighborhood organizations, the Neighborhood Voices map keeps AU and the Seminary in their neighborhood, allowing essential neighborhood engagement and cooperation.

## IV. Addressing an extraordinary circumstance

We appreciate that the Council generally gives special weight to the recommendations of the appointed Ward redistricting task force. In Ward 3, however, the task force process broke down, as reflected in the task force's meeting transcripts and "chat" records, comments posted to the redistricting website, postings to public listservs from community members and from Council Member Cheh's office, and correspondence sent to her and other Council members. The Neighborhood Voices coalition came together out of necessity, to develop a map that keeps neighborhoods together and that reflects the community input provided via these channels.

If the Task Force had embraced community engagement from the start, there would have been opportunities to work through issues and complete the map-making process in accordance with proper principles and reflective of community input. Instead, we must make our case to you.

Further, it might have been possible just to recommend a few adjustments to the task force map, but a final factor forced the Neighborhood Voices coalition to propose its own map. That factor was the Task Force's decision to include the large, north-south SMD mentioned above, which precludes the Subcommittee from merely shifting an SMD from one ANC to another to keep neighborhoods intact and address other community concerns. Accordingly, we have developed and present an alternative map of the Ward for your consideration, showing both ANC and SMD boundaries.

#### V. Summary

Perhaps needless to say, the redistricting process should not be used to reimagine the ANC system, to replace the principle that ANCs exist to speak for neighborhoods with a principle that the ANC system is how they are defined. Each neighborhood has a right to be heard on all of its interests and issues, and its residents have a right to be heard by their ANC. Redistricting can pose challenges, and no map is perfect, but the goal is clear.

The Neighborhood Voices coalition came into being and has worked together to prepare an alternate map that is consistent with the purposes for which ANCs were established, consistent with redistricting guidelines, and consistent with community input. We appreciate the opportunity to present the Neighborhood Voices map to you and would welcome the opportunity to work with you to ensure the Ward has a compliant map under which neighborhoods and their residents can be heard

# VI. Explanation of ANC adjustments

Following are brief explanations for the changes the Neighborhood Voices coalition proposes as compared to the task force's map. In addition to adjusting some ANC boundaries to better reflect neighborhood boundaries, we also tried to keep SMDs similar to current ones where possible, to comport with geographic boundaries and ensure that smaller communities are retained within a single

SMD, among other factors, as applicable, which redistricting instructions identify as appropriate in defining SMDs.

#### A. Alternative approach to 3A

The task force approach to the new ANC 3A is the central issue. The Neighborhood Voices coalition accepts that a new ANC may be appropriate, and acknowledges that a new ANC in the middle of the Ward is a tenable solution. How that ANC is drawn is critical however, with a core goal of keeping neighborhoods intact and ensuring that their residents retain the ability to be heard on their shared issues and interests.

Unfortunately, the Task Force took a more disruptive approach. Its proposed 3A splits existing neighborhoods, like Cleveland Park, and brings into 3A communities, like Massachusetts Avenue Heights, that have stronger ties to communities and issues within the jurisdiction of their current ANCs. As will be explained more fully in relation to each affected ANC, the Neighborhood Voices map corrects these problems by better reflecting true neighborhoods within the ANC.

Further, we believe that our approach is better for a new ANC 3A, enabling it to start smaller, with a sharper geographic focus, and enabling it to grow as it matures and as new residents move into the area.

New SMD 3A05 starkly illustrates the problem created by the Task Force's version of 3A:

- The Task Force's proposed 3A05 runs north-south/southeast for 1.6 miles, includes only a single block at the north end and spans at least four distinct neighborhoods (Cleveland Park, Massachusetts Avenue Heights, Observatory Circle, Woodland-Normanstone) and four different elementary school catchment areas (Hearst, John Eaton, Oyster Adams, and Stoddert).
- The Task Force's SMD 3A05 essentially creates a corridor of portions of communities that have
  no relation to each other, cutting them off from neighborhoods of which they are part and with
  which they share actual issues and interests. SMD 3A05 runs contrary to the core purpose of
  the ANCs by interfering with and unnecessarily complicating or outright impairing the ability of
  neighborhoods within the Ward to engage on issues and interests important to them.
- To take one example of its implications, Quebec Street NW from Connecticut to Wisconsin currently is within a single SMD in ANC 3C. The Task Force map divides it, such that just one block of Quebec from 34th to 35th Streets would span two ANCs and three different SMDs, making simple neighborhood requests such as for speed humps on a single block needlessly cumbersome.

In contrast, the Neighborhood Voices map proposes an ANC 3A that is reasonably compact and more coherently composed of communities that share issues and interests, facing onto Wisconsin and Massachusetts Avenues, respectively. It is new, and there will be changes over the next decade, but the Neighborhood Voices approach makes far better sense of the new ANC while correcting serious problems posed by the Task Force version.

We note that alternative approaches might be viable to create new ANCs among other neighborhoods. Neighborhood Voices offered to work with the Task Force on such concepts, but they would have

required further and deeper engagement with communities across the Ward, and time was not sufficient for Neighborhood Voices to conduct such further coordination on its own.

# B. Alternative approach to 3B

ANC3B is formed around the densely settled neighborhoods of Glover Park and Cathedral Heights with five SMDs in an area of about one-half square mile. This area has for decades been the site of the most consistently dense residential development in Ward 3, with blocks of row houses or semi-detached homes as well as 4-unit apartment buildings and larger condo/apartment buildings. In contrast, the surrounding areas of Massachusetts Avenue Heights to the east and Wesley Heights to the west are among the lowest density residential neighborhoods in Ward 3.

- 1. The proposed boundaries of ANC3B in the Neighborhood Voice Map
- Are compact, symmetrical, and consistent with the existing identity of residents of Glover Park and nearby Cathedral Heights.
- Follow the emphasis on serving neighborhoods, by being built around the recognized neighborhoods and consideration of where people live, walk, socialize, and carry on their activities.
- Respect the natural geographic boundaries on three sides created by federal and National Park Service properties on three sides of ANC3B: Whitehaven Park on the south, Rock Creek Park and the U.S. Naval Observatory on the east, and Glover Archbold Park on the west.
- Bring together areas that share interests and issues, including the local elementary school,
   Stoddert; the local commercial area on Wisconsin Avenue in Glover Park; two election precincts,
   28 and 11, and Police Service Area 204.
- Follow the geography ridge lines and valleys and activity patterns that also run north and south in the Glover Park area. The blocks, utility systems, key Metrobus public transportation service, and tiers of development of different types at different periods all follow a north-south line.

# 2. The Task Force map

- Breaks the natural boundary created by Glover Archbold Park to add three Census blocks to ANC3B along New Mexico Avenue west of the park. The Neighborhood Voices map respects the Glover Archbold Park boundary for ANC3B.
- Does not fit the stated emphasis on defining ANCs by shared interests and issues, extending ANC3B into neighborhoods that do not identify with Glover Park or Cathedral Heights and are in fact the core of the Sutton Place commercial area that serves Wesley Heights.
- Does not respect the local school boundaries or the election precinct boundaries, which the law mentions explicitly as considerations in redistricting. The residents of the 3 blocks west of Glover

Archbold Park that would be assigned to ANC3B are in the Mann Elementary School boundaries, and area also in a different Police Service Area 205, which serves the entirety of ANC3D and the areas west of Glover Archbold Park. PSA 205 has a different lieutenant and a different set of officers, separate community meetings and a long-standing relationship with the area it serves, which does not include ANC3B.

- Does not reflect the geography or the way people live in Glover Park, where almost all key
  elements run north and south, instead following a zig zag pattern that cuts across blocks and
  divides people with similar issues and interests. When residents are concerned about traffic
  calming, paving and sidewalks, utilities, stormwater problems, street trees, patterns of crime,
  they are looking at entire stretches of a street. Issues do not run for a block or two and then
  shift over to the next street.
- Describes the proposed SMD boundaries as keeping "like with like"; however, the Task Force's
  boundaries in Glover Park do not adhere to that principle. By cutting across north-south
  divisions, the map draws one SMD that combines a few blocks of garden apartments and a few
  blocks of row houses, and then cuts off those blocks and creates another SMD that combines
  neighboring garden apartments with row homes. If the emphasis is on effective representative
  for renters and residents in multi-family units, the task force map falls short.
- Calls for four SMDs in Glover Park to border or at least touch the Stoddert School grounds or playfield, based on the argument that all four Commissioners would therefore have a stake in what happens to Stoddert. In comparison, the Neighborhood Voices Map calls for three SMDs to border the Stoddert School grounds, and the fourth SMD would be one block away. That is not a significant difference. The reality is that Glover Park is a very compact area and every Commissioner in ANC3B has constituents who send their children to Stoddert, so every Commissioner has a stake in Stoddert, even if their closest boundary is one block away, two blocks away, or three blocks away from the Stoddert campus.

# C. Alternative approach to ANC 3C

For ANC 3C there are two fundamental issues, keeping Cleveland Park within one ANC and retaining communities in 3C that share interests with neighborhoods in the ANC.

1. Cleveland Park is an identifiable neighborhood with clear interests in Wisconsin Avenue

Cleveland Park is clearly an identifiable neighborhood with many established institutions and interests of shared concern for its residents, including along both Connecticut and Wisconsin Avenues and throughout the rest of its geographic area.

Cleveland Park residents have a clear, legitimate, and longstanding interest in the Wisconsin Avenue corridor, along which are located, for example, the neighborhood's supermarket and beloved family restaurants, and vital public transportation lines. The Task Force report acknowledges as much, noting Wisconsin as a boundary on both the Cleveland Park Citizens Association (CPCA) and the Cleveland Park Historic District (CPHS) maps. CPCA and CPHS have played an active role in relation to Wisconsin Avenue, including commercial development, residential housing, public transit, and community events.

The Task Force map excludes from ANC 3C many neighborhood residents who live west of 34th Street. These Cleveland Park residents excluded from 3C would no longer have the right to representation in 3C or to be heard on neighborhood matters which would remain within that ANC's jurisdiction. Instead, they would be grouped with communities across and up and down Wisconsin Avenue which they have little connection other than with respect to the Avenue.

Those Cleveland Park residents remaining in 3C would be stripped of their voice on important public matters pertaining to Wisconsin Avenue. Further, they would also lose voice on institutions and interests within Cleveland Park west of 34<sup>th</sup> Street, such as the Macomb Park, playground, and community center, to just one example, a focal point for family life in the neighborhood.

## 2. The Task Force ignored strong community opposition

Despite overwhelming public comment opposing its proposal to divide Cleveland Park, the Task Force never prepared, proposed, or considered an approach for it to be intact. Having requested that neighborhood associations from across the Ward provide input, the Task Force ignored the comments of CPCA, CPHS and individual neighborhood residents (Contrary to the description in the Task Force report and statements of its chair at Task Force meetings, comments posted by the Task Force overwhelmingly supported keeping CP intact).

Even after Neighborhood Voices came together to take the extraordinary step of developing a full map demonstrating how to reconfigure 3A to keep Cleveland Park and other neighborhoods intact, and expressly offered to work with the task force, no outreach to CPCA or CPHS was ever made. Instead, the Task Force focused on avoiding having "population clusters" at the edge of ANCs, and also avoiding having more than one ANC abut the same Avenue, even as the Task Force ultimately departed from these concepts elsewhere in the Ward.

#### 3. Cleveland Park is intact in the Neighborhood Voices map

Under the Neighborhood Voices map, Cleveland Park is intact within 3C with no deleterious effects for other communities. In addition, by creating more rational boundaries for 3A and its SMDs, to remove the Task Force's proposed 1.6-mile SMD 3A05, the Neighborhood Voices map retains and keeps intact within 3C other communities, such as Mass Ave Heights and Woodland-Normanstone, that share institutions and interests with neighborhoods to their east.

The Task Force notes that it extended the northern boundary of 3C to include more of Cleveland Park, which Neighborhood Voices supports, but the Neighborhood Voices map makes further adjustments to capture this area more fully by retaining area currently within 3C. The Task Force's rationale for proposing at the same time to exclude other Cleveland Park residents, however, is not sound. Simply put, the Cleveland Park neighborhood can be intact in 3C and should be.

## D. Alternative for ANC 3D

Major Differences between the Task Force and Neighborhood Voices map are that the Neighborhood Voices map keeps AU and Wesley Seminary in 3D (Task Force has them in 3E) and keeps Westover Place in 3D with the rest of Wesley Heights (The Task Force map splits the neighborhood by placing Westover Place in 3A).

#### 1. Keeping AU and Wesley Seminary in their neighborhood

Keeping AU in 3D reflects the strong preference of the neighbors that they remain in the same ANC as AU, as they have been for at least the past 20 years. Neighborhood Voices offered to engage the task force on AU, as the Task Force had been debating whether to place AU in 3A, 3D or 3E, but the offer was not accepted. Keeping Wesley Seminary in 3D similarly comports with community wishes. See further discussion under 3E.

#### 2. Keeping Westover Place in 3D--correcting Wesley Heights neighborhood split

The Neighborhood Voices map proposes keeping Westover Place in 3D, keeping the neighborhood intact as requested by its neighborhood organization. Its residents shop, dine and live in Wesley Heights and Spring Valley. The majority of children attend school across the street at the local neighborhood elementary school, Horace Mann.

In addition, like the rest of Spring Valley and Wesley Heights, Westover Place is on the fence line of AU, which has major impacts on its residents. Westover shares the same concerns as Spring Valley and Wesley Heights neighbors and have long worked together on issues. The Task Force did not address requests to correct this neighborhood split.

#### 3. SMD corrections

The Task Force map makes major changes to current boundaries without providing reasons.

The Neighborhood Voices map, which aligns much more with current boundaries, is based on input from a number of neighborhood organizations (all of which were ignored by the Task Force) and does the following:

- Keeps the GW Mt Vernon campus in the same SMD as surrounding neighborhoods (3D06)
- Unlike the Task Force, does not put census blocks west of Battery Kemble Park in the same SMD as census blocks east of the park (3D01); these two areas are physically separated by the substantial geographic divide created by the park.
- Keeps Sibley Hospital in the NW Palisades SMD 3D04 (Task Force has it in a Spring Valley SMD)
- Keeps the lower MacArthur/Foxhall Road neighborhood in the same SMD (3D09). The Task Force map splits the neighborhood at Foxhall Road.

#### E. Adjustments for ANC 3E

In several respects, the map approved by the Task Force for ANC3E falls short of meeting the needs of 3E residents and the task force's own guiding principles. These problems are listed below. We note, however, that, as a result of the Neighborhood Voices coalition efforts, the Task Force map retains Massachusetts Avenue boundary for the border between ANC3D and ANC3E as requested by most living in American University Park and Fort Gaines. This is an improvement over an earlier proposal from the Task Force (though it departs from the task force's asserted principle of not having major corridors be borders of ANCs).

## 1. Correcting Tenleytown and Friendship Heights neighborhood splits

Task Force proposal would assign residents living behind the Tenleytown firehouse on Wisconsin (basically within the triangle bounded by Nebraska, Van Ness and Wisconsin) from ANC3E to the new ANC3A. These residents have always considered themselves part of Tenleytown and share interests with other residents of Tenleytown. Moving them to the new ANC would aggregate them mostly with those living in large apartment complexes (including those living in the over 1400 units soon to open at City Ridge and under construction at Upton Place, who will have entirely different needs, as residents of essentially new communities with their own amenities (stores, restaurants, gyms) distinct from Tenleytown. The Task Force ignored the requests of residents of this area to remain in 3E. The Neighborhood Voices map corrects this neighborhood split.

The Task Force map moves the upper boundary of ANC3E and ANC3G west to 42nd Street (from 41st Street). Those residing between 41st and 42nd Streets view themselves as part of Friendship Heights rather than Chevy Chase, and most would prefer to be within ANC3E. Residents voiced this request to the Task Force. Moving the boundary to 41st Street would create a natural extension of the boundary further south along Reno Road, could be accommodated without affecting the compliance of the affected Single Member Districts. This suggestion was made to the Task Force which indicated it could make the adjustment but in the Final Report, the boundary remained at 42nd Street.

## 2. Returning AU and Wesley Seminary to their neighborhood

In the Task Force proposal, the two AU Single Member Districts (one of which is new) and Wesley Seminary are located within ANC3E, instead of ANC3D where the AU SMD is currently located. Keeping them in ANC3D makes far more sense, since 3D surrounds the main campus.

With regard to AU, the residents of Spring Valley and Wesley Heights have a strong interest in engaging on impacts of the large university that they border, including matters relating to the 13 new or expanded buildings proposed for construction as part of AU's 2021-2022 campus plan.

The current ANC Commissioner representing AU students wrote to the Task Force in support of placing AU within ANC3E, saying few students have deep connections to the area surrounding the campus. That could be attributable to the short time that most students live on campus (generally two years). Still, students living at AU deserve a voice in the community where they live. Also, many move into apartments in the 3D area for their final years at AU and can become even more a part of the community.

The Subcommittee should also keep in mind that the communities around AU and Wesley Seminary have a deep connection to those institutions, and this relationship is long lasting. Further, looking ahead, ANC3E's plate will be overflowing given the expected redevelopment in Friendship Heights and Tenleytown. The additional responsibilities relating to the further processing of AU's proposed expansion will likely overwhelm ANC3E.

While the redistricting guidance notes that ANCs can acceptably vary widely in size, one of the goals of the Task Force is to reduce the number of SMDs in ANC3D, and this would still be reduced (from the current ten to nine). Keeping neighborhoods intact and in the same ANC as institutions and interests important to them clearly is the greater priority in any case.

## F. Alternative approaches for 3F and 3G

We focus on ANCs 3A, B, C, D, and E, because the more substantial changes from the Task Force map are made in relation to them. With respect to ANCs 3F and G, we note first that, to the extent the Neighborhood Voices map differs from the task force proposed map, the differences serve to return their configurations closer to their current ANC boundaries.

- 1. 3F in the Neighborhood Voices map
- Boundaries largely match the boundaries proposed in the Task Force map, with the exception of
  the southwestern corner, where residents in blocks between 37th Street and Reno Road south
  of Upton Street indicated that they identify more with UDC/Van Ness in ANC3F than with
  Wisconsin Avenue. The Task Force map assigned those blocks to the new 3A rather than to 3F.
  The Neighborhood Voices map proposes boundaries that more closely match residents'
  perceptions of their neighborhood.
- Recognizes the ridge line that creates a geographic boundary on the north side of Rodman Street between 37th Street and Reno Road. The short line of homes and residents in that block identify more with Cleveland Park than with the neighborhoods to the north, so the Neighborhood Voices map suggests that those homes be assigned to 3C. That change should bring the SMD 3F06 [shown as 2107 residents] into the target range.
- Proposes shifting from 3F to 3G one triangular block formed by Military Road, Nebraska Avenue, and Nevada Avenue, at the eastern edge of Ward 3. That change is designed to recognize that many of the homes and residents in that block are oriented more to the area along and north of Military Road, and the perception of Nebraska Avenue as the dividing line between neighborhoods northeast of Nevada Avenue. This called for some adjustments in the SMDs in 3F, and some SMDs are slightly over the target.
- 2. Regarding 3G, the Neighborhood Voices map proposes
- For the upper western boundary between 3E and 3G, to use 41st Street as the dividing line rather than 42nd Street as the Task Force map adopted, as discussed under 3E above.
- Shifting from 3F to 3G one triangular block formed by Military Road, Nebraska Avenue, and Nevada Avenue, at the eastern edge of Ward 3, to correspond to people's identification with the neighborhood to the north of Military Road.

The changes called for some adjustments in the SMDs in 3G, but the basic outlines of the SMDs are very close to the same.