



Defence Force Remuneration Tribunal

DECISION

Defence Act 1903

s.58H—Functions and powers of Tribunal

SPECIAL FORCES SALARY STRUCTURE

(Matter 9 of 2023)

MS B. O'NEILL, PRESIDENT

MR A. MORRIS, MEMBER

CANBERRA, 7 DECEMBER 2023

MAJGEN G. FOGARTY AO RETD, MEMBER

[1] This decision arises from a listing application received from the Australian Defence Force (ADF) for a determination to be made under Section 58H of the *Defence Act 1903* (the Act). The listing application¹ seeks to re-design the Army Special Forces (SF) employment categories and introduce three new workforce groups. The proposed changes include amendments to salary placements, the nomenclature of existing employment categories, and establishing a new category.

[2] We were assisted in our deliberations in this matter by workforce briefings on 13 September 2023 at Russell Offices, Canberra, followed by an inspection on 14 November 2023 at Holsworthy Barracks. The inspection included displays and information briefs provided by members of the Defence Special Operations Training and Education Centre (DSOTEC); 1st and 2nd Commando Regiments; the Special Air Service Regiment; the Special Operations Engineer Regiment; the Special Operations Logistic Squadron; the ADF School of Special Operations; the ADF Parachute School; and the 6th Aviation Regiment.

[3] We considered this matter in a hearing conducted at Holsworthy Barracks on 15 November 2023. Ms K. Hagan appeared for the ADF and Mr M. Guteridge for the Commonwealth. Four witnesses gave evidence for the ADF. Evidence concerning many aspects of this matter was provided in separate classified materials and will not be reproduced or expanded upon in this decision.

Background

[4] The term ‘special operations’ is used by the ADF to refer to highly specialised and focused military activities. These differ from conventional Army operations in the degree of extreme physical and political risk, operational techniques and modes of employment. Accordingly, SF salary forms the upper benchmark of ADF salary rates. The Tribunal last considered these workforces in-depth in Matter 16 of 2013.²

[5] The Special Operations Forces (SOF) are units of Special Operations Command (SOCOMD). Previously the SOCOMD workforce has been categorised as either SF or Special Forces Support Staff (SFSS), which the ADF now proposes replacing with the nomenclature of SF Operators, SF Integrators and SOF Enablers.

Submissions

ADF

[6] The ADF submits that in October 2020, Army’s Head of Land Capability directed SOCOMD to conduct a Special Forces Workforce Review (SOFWR).³ One of the key findings of the SOFWR was that *‘existing relativities between workforce types internal to SOCOMD are no longer relevant based mainly on changes to capability requirements due to the rapid pace of change in the strategic environment and technology’*.⁴ As a result, SOCOMD was tasked to *‘rapidly generate new and novel capabilities that are able to mitigate the most serious security risks to Government while also achieving significant cultural reform’*.⁵

[7] To meet these challenges SOCOMD intends to contemporise the SF skill grades and amend pay grade placements within the Graded Officers Pay Structure (GOPS) and the Graded Other Ranks Pay Structure (GORPS).⁶ The ADF submits these changes will align the strategic segments of the SOF and allow access to skills recognition pathway options for current and future SOCOMD employees, regardless of Service, trade or rank.

[8] The ADF submission was presented in two parts:

- a. Volume 1 seeks a revision of SF Operator trades, and defines a requirement for three distinct SF Operator categories – Special Reconnaissance (SR), Strike and Recovery (S&R), and Special Warfare (SW) – and sets out the ADF proposal to restructure the SF Operator workforce structure by:
 - i. changing the nomenclature and skill progression requirements applicable to impacted existing employment categories;

- ii. aligning the salary outcomes for Officers (to pay grades 6 to 8) and Operators (to pay grades 8 to 10) in impacted employment categories; and
 - iii. establishing two new employment categories in the Special Forces Operator Workforce.
- b. Volume 2 focusses on the remainder of the workforce previously known as SFSS. The ADF proposes replacing the existing SFSS salary structure with two new skills recognition frameworks by:
 - i. removing the existing SFSS construct;
 - ii. amending the existing liability period from three to four years; and
 - iii. introducing a new Enhanced Technical and Interoperability Skills framework.⁷

Commonwealth

[9] The Commonwealth did not oppose the ADF proposals in either Volume, however did ‘*note several concerns on specific components put forward by the ADF.*’⁸ being concerns, in regard to Volume 1:

- a. the future flexibility of the proposed pay grades for SF Operators noting they sit at the highest pay grades in the GOPS and GORPS and how the salary could be managed should there be a future need to differentiate these categories;
- b. the absence of the affiliated Navy Clearance Diver Tactical Assault Group in the proposal, the relativity impacts, and a suggestion that any proposed restructure of that workforce will now need to stand alone from this proposal;
- c. the previous roll-in of qualification and skills allowance for SAS and Commandos, but not for Air Force Combat Controllers, noting the work groups will now sit at the same pay grade; and
- d. potential dissatisfaction among impacted workgroups, particularly SAS officers and troopers, who have historically been placed at the highest pay grade, will not receive additional remuneration under the restructure, and will no longer be recognised differently to Commandos and Combat Controllers.⁹

And in Volume 2, concerns about:

- e. the extension of the enduring liability (sunset clause) period noting three years was previously chosen to avoid potential skill degradation as well as whether this extension will incentivise longer absences from SOCOMD; and

- f. whether the Tribunal should endorse a 12-month minimum period for which a member must return to SOCOMD prior to being eligible for a further enduring liability period.¹⁰

[10] We will deal with our deliberations of each volume separately.

Witness Evidence

[11] Four witnesses gave evidence for the ADF. Their written and oral evidence is summarised below.

[12] Brigadier (BRIG) N. Juchniewicz DSC and Bar, CSC, Commander Special Forces Group provided evidence regarding the process of the SOFWR, the SOCOMD operating environment, and the impact on the workforce following a range of reviews into cultural and morale challenges, both within the ADF, and across the SOF Workforce.

[13] He described the new SOCOMD SF Operating Model as a *'framework that structures its core activities into four distinct Special Operations outputs, namely: Special Reconnaissance, Strike and Recovery, Special Warfare and Technical Effects'* explaining *'this operating model requires specialised workforce groups to integrate as teams and operate in the highest risk environments, delivering against the most strategically sensitive mission types'*.¹¹

[14] He detailed the need for the ADF to replace the SFSS remuneration structure with a *'more flexible framework that recognises SF interoperability skills where required, and a larger group of ADF trades for the integration of technical skills to enable the delivery of the Special Operations capability'*.¹² Expanding on this, he explained how *'the current structure only recognises a limited number of SFSS Army Other Rank employment categories which means that emerging skills in Army, as well as Navy and Air Force, cannot be recognised through additional remuneration'*. Adding that *'also, the current structure does not recognise SFSS Officers, including the remuneration of those officers commanding technical capabilities within SOCOMD'*.¹³

[15] Warrant Officer Class One (WO1) P. Schwizler, OIC Workforce Cell and SF employment category Manager, DSOTEC gave evidence related, in the most part, to Volume 1 and a key outcome of the SOFWR being *'the redesign of the workforce to be fit for purpose in the current strategic environment and into the future'*.¹⁴ He explained the main changes are the operating concepts, which *'focus on four distinct core activities of Special Reconnaissance, Strike and Recovery, Special Warfare and Technical Effects'* as opposed to the prior *'centralised focus on a specific set of SF mission profiles'*.¹⁵

[16] He explained that a *'new employment category is vital for SOCOMD to recruit, generate, train and employ Special Warfare expertise'* and that this category will provide bespoke skills that involve a blend of SF skills. He stated this has evolved because the *'approach of adding Special Warfare skilling and training to the Commando and SAS workforce worked for previous conflicts'* but now *'dilutes core activity specialisation, creates workforce sustainability issues and does not provide the flexibility and agility required to be effective in a more dynamic and uncertain operating environment'*.¹⁶

[17] WO1 Schwizler supported the proposal to increase the pay grades of the existing Commando and Combat Controller workforces, and set pay grades of the SW category, so that they align with the current SAS workforce. He considered this to *‘reflect a shift in enterprise value as the delivery of SF capabilities are now considered to be of equal criticality to the success of SOCOMD’s mission in a highly dynamic and changing operational environment’*.¹⁷

[18] Warrant Officer (WOFF) K. Meier CSC, Squadron Sergeant Major No.4 Squadron also gave evidence in relation to Volume 1 but with specific reference to the roles and responsibilities of the Air Force Combat Controllers and Combat Control Officers within SOCOMD. He stated that the proposal recognises that the Combat Control workforce generates a *‘peer, contemporary and complementary Special Forces capability’*¹⁸ in part, because there is *‘now a much heavier reliance on Combat Controllers to be self-reliant and survivable at the highest levels of readiness’*.¹⁹

[19] He explained that the Air Force Combat Control capability has *‘evolved through operational need in line with other SF Operator roles’* and that *‘Combat Controllers and Combat Control Officers apply their core skills and capabilities both independently and within Special Forces teams’*.²⁰

[20] WOFF Meier considered the proposal demonstrates *‘an accurate reflection of the contemporary and required skills and capabilities of the Combat Control workforce and sets the precedence of a non-Army SF capability’*.²¹

[21] Warrant Officer Class Two (WO2) G. Warren, SFSS Trade Warrant Officer, DSOTEC gave evidence specific to Volume 2 and the evolution from SFSS to the SF Integrator and SOF Enabler employment categories. He stated that *‘the ability to rapidly delineate or reactively swap these categorisations with a dynamic and complex threat environment has become increasingly challenging and now highly inefficient’*. Further, he has *‘observed (and participated within) the emergence of SOF and SF multi-disciplinary teaming concepts’* which he now considers *‘the most effective, contemporary and futureproofed version of SOCOMD training’*.²²

[22] We are encouraged by his evidence that SOCOMD will have the flexibility to utilise and recognise a wider range of ADF employment categories and agree that *‘elevating the value of technical and trade specialists with SOCOMD is likely to support retention efforts, address cultural issues, improve career management and increase workforce mobility’*.²³

[23] WO2 Warren provided context to the Commonwealth concerns about skill degradation for the Integrators and Enablers, stating *‘concerns around skill atrophy during the proposed four-year period are less relevant as a number of employment categories are now able to utilise the enhanced skills gained with SOCOMD in their parent trades’*. In turn, he considered this *‘brings innovation and increased capability back to broader Army and the ADF’* and is *‘seen as an important consideration in terms of workforce retention’*.²⁴

Volume 1 – SF Operator

[24] In reviewing the evidence submitted in Volume 1, we note that a *‘comprehensive Nature of Work Assessment was conducted to determine the value of all SF Officer and Operators which reviewed qualifications, range of skills, depth of knowledge, range and complexity of actions and of environment’*.²⁵ We also note the outcome of the SOFWR also proved an *‘acknowledged need for a skilled and dedicated workforce focussed on the delivery of Special Warfare, allowing the SAS workforce to focus on Special Reconnaissance and the Commando workforce on Strike and Recovery’*.²⁶

[25] We accept that, as a result, *‘the long standing relativities between SF employment categories are no longer applicable’* because now the *‘proposed SF Operator categories across Special Reconnaissance, Strike and Recovery, Special Warfare and Air Force Combat Controller are selected and trained against a common set of attributes, with the necessary specialisation in training’*.²⁷

[26] The Tribunal last reviewed the Air Force Combat Controller workforce in 2014²⁸ and we accept the evidence that the *‘Combat Controller capability and its workforce are now considered an SF Operator workforce that needs to be managed and remunerated accordingly’*.

[27] We considered the proposed implementation and establishment of a dedicated SW category, which will become a core Operator category alongside SR, and S&R. The ADF submits the category was *‘evaluated against the proposed SF employment category’* and *‘noting the similar complexity of actions and complexity of environment, salary placements are proposed at the same pay grades to the current SR and S&R placements’*.²⁹ We accept that determining a lower placement *‘may not sufficiently incentivise recruitment for the calibre and breadth of skills and experience required of an SW Officer or Operator’*.³⁰

Considerations – Volume 1

[28] We are aware of the recent period of significant scrutiny of the SF workforce, which has clearly been challenging in maintaining workforce assurance and confidence. We have considered the importance of morale, culture, and the long-standing and proud history of SOCOMD, and particularly of the SAS and Commando workforces, in our deliberations. We acknowledge that the alignment of all SF Operator categories is significant and will sometimes be challenging to the workforce. We note the evidence of BRIG Juchniewicz that *‘there is no intention to alter aspects associated with unit naming conventions, associated between the Commando and the SAS, in terms of those workforce employment categories can remain labelled, associated with those structures. And simple things such as their uniform embellishments with those two types of workforces, there is no intention to creating any change to that’*.³¹

[29] We accept that *‘the perception of exceptionalism of one workforce over another, contributed to in part by a pay differential, is no longer desired or required by SOCOMD nor an accurate reflection of the current SF Operator workforce as a whole’*.³² We are encouraged that the ADF *‘recognises retention and morale of all SF Operator trades as equally relevant’*³³ and that it *‘identifies all SF Operator trades as of equal enterprise and capability value and therefore the continuation of pay differentials is no longer desired’*.³⁴

[30] We accept this submission recognises Combat Controllers as generating equivalent work value to other SF Operator categories. We consider this is appropriate noting the evidence that this workforce *‘is now at a density that requires a level of pay and skill group tiering sufficient that provides a sustainable and enduring workforce model that requires the ability to work through, not just recognising rank levels, but has a specific focus on skill remediation’*.³⁵ We accept that recognising this results in an increased pay grade and placement for this workforce.

[31] We agree this model recognises the *‘equal value of all Operator trades’* and that *‘the assessment conducted on the SF Operator employment categories demonstrates a rise in value of the Commando and Combat Controller workforce relative to the existing SAS trades and articulate(s) the value of the new SW Operator category’*.³⁶

[32] We deliberated on the concerns of the Commonwealth that the proposal *‘appears to disproportionately benefit some employment categories over others’* and whether *‘this may give rise to further internal dissatisfaction’*.³⁷ We consider the management of workforce expectations to be a matter for the ADF. Having said that, we agree this is likely to be mitigated through the detailed communications plan. We take seriously the ADF’s intent to *‘focus on ensuring personnel understand in detail the process, nature and implications of change’* through *‘targeted engagement with workforce segments and individuals through the chain of command, the delivery of individual letters and opportunities to discuss issues, queries and concerns’*. We are encouraged that the ADF commits that this engagement will continue to *‘post-transition to ensure changes are embedded, potential issues are addressed and continuous improvement occurs’*.³⁸

[33] We note the proposed changes are, in part, designed to address Command and culture issues identified by reviews into SOCOMD. We agree that *‘by introducing a more centralised command and control structure, adoption of a common SF selection program, and creation of a more aligned trade progression model and deeper training specialisations, it is anticipated that the cultural changes will become normalised into the future as the Command operates a new SOF people system’*.³⁹

[34] We considered that *‘a common application of Special Forces Disability Allowance (SFDA) and Special Forces Sustainability Allowance (SFSA) is sought for the newly established SW Officers and Operators’* and agree with this intent noting the alignment of the workforces and the operating environment.⁴⁰

Volume Two – SF Integrator and SOF Enabler

[35] In Volume 2, the ADF submits the new employment categories *‘provide technical and interoperability skills across all core activities, providing vital capability’*.⁴¹ We accept this has *‘influenced the need for a new model to recognise this workforce, made up of varying trade streams of Officers and Other Ranks’*.⁴²

[36] In considering these workforces, we note the SOFWR identified *‘that the SFSS salary structure had been suitable to support the workforce at the time of the last determination.’*⁴³ However, a number of inconsistencies in the structure have been identified including, *that the current structure recognises a limited number of employment categories with skills well above parent employment category requirements; does not recognise any Officer categories; and does not recognise members outside Army’.*⁴⁴

[37] Of note in Volume 2, the ADF seeks to extend the sunset clause specifically for Integrators and Enablers to *‘address workforce shortfalls by supporting workforce mobility initiatives (allowing members to retain their plus one pay grade for two postings before returning to SOCOMD’.* We considered the evidence that, with the inclusion of Officers, this will provide *‘the ability for members to complete back-to-back postings outside of SOCOMD’ and permit them to reach key career milestones and remain competitive against their peers for progression in their category’.*⁴⁵

[38] We accept the workforce and salary structures provided for SFSS are no longer fit for purpose for SF Integrators and SOF Enablers and constrain their application to a *‘small number of Army Other Ranks’.* This has meant SOCOMD has been *‘unable to recognise equivalent contribution to SOCOMD capability provided by a broader range of Army parent categories, Army Officers, or personnel from Navy or Air Force’.*⁴⁶

Considerations – Volume 2

[39] From the outset, we were encouraged by the evidence of WO1 Schwizler about *‘the support the SF Operator workforce has for the creation of the SF Integrator and SOF Enabler workforce types, due to both the increased capability that this represents and the more equitable recognition of work value across SOCOMD’.* We place value on his view that this *‘will greatly enhance trust and confidence in the capabilities resident across the workforce in addition to the obvious capability benefit of more effective tactical integration in the delivery of technical effects’.*⁴⁷

[40] We agree the salary structure proposed by the ADF for SF Integrators and SOF Enablers recognises the different requirements relating to enhanced technical skills and interoperability skills. We accept the *‘demarcation of these skills across two distinguishable frameworks and improved scalability of recognition’*⁴⁸ will allow SOCOMD to more accurately recognise capability relevant skills, which can then be applied across the broadest range of eligible ADF members.

[41] We accept that extending the sunset clause from three years to four will encourage workforce mobility by allowing members to retain their advanced pay grades for two Army posting cycles. We consider the evidence that this permits them to meet parent company career and promotion milestones and support this approach.

[42] We considered the Commonwealth proposal for us to ‘endorse’ a 12-month period for ‘*which personnel are required to return to SOCOMD before the proposed four year enduring liability resets*’.⁴⁹ However, we accept the evidence of BRIG Juchniewicz that ‘*this is subject to the rank and trade of the individual*’⁵⁰ and that SOCOMD is ‘*not wanting to lock it in to a set timeframe but to actually have the flexibility to make those determinations as needed*’.⁵¹ We note the extant management boards also have the means to assess individual circumstances and therefore decline the suggestion.

[43] As with the SW workforce, the ADF also seeks to pay SF Sustainability Allowances. However, in this case, it simply continues the extant rate to the new workforces, and we agree to that.

Conclusion

[44] In considering the evidence of both volumes, we gave consistent regard to the SOFWR, noting the review ‘*extended for over a 12-month period of time and involved extensive consultation with both the workforce and other stakeholders associated with the Special Operations capability*’.⁵²

[45] We accept that SOCOMD has revised the governance structures regarding screening, selection and service within SOCOMD. This includes how the executive will continue to manage the workforces through the Personnel Capability Management Board (PCMB) and the Employment Category management Board (ECMB). We accept these boards are ‘*responsible for facilitating the SF selection processes and managing training throughputs*’.⁵³ We note the evidence that the PCMB ‘*will continue to be the mechanism utilised by SOCOMD to make decisions about the proposed pay grades placements for SF Integrators and Enablers and will also continue to be the mechanism by which the enduring liability (sunset clause) for Integrators and Enablers is assessed*’.

[46] Specifically in regard to the concerns of the Commonwealth about flexibility at the upper levels of the GOPS and GORPS pay grades; we note the ADF’s intent for any future case to be brought before us ‘*on its own merits*’.⁵⁴ We consider flexibility in the pay structures is not necessarily an issue isolated to this workforce. We note the intention of SOCOMD to ‘*conduct the analysis associated with the disability allowances associated with the adoption of the new Integrator and SOF Enabler*’⁵⁵ and welcome future cases in due course.

[47] We again note that SOCOMD has developed a communication strategy for the internal workforce and the broader ADF to be managed by the DSOTEC. We are supportive of the depth and breadth of that plan to ensure all members are well informed and kept apprised of all impacts – both personally and across their workforce.

[48] We note the ADF intends to implement a five-year non-reduction period to ensure no personnel are disadvantaged because of transition and accept this will be implemented under s.58B of the Act and administered by Defence.

[49] In closing, we ask the ADF to return to us in June 2026 having assessed the progress of the workforce at the halfway point of the non-reduction provisions, and again at the conclusion in February 2029.

[50] Determination 18 of 2023 gives effect to our decision from 1 February 2024.

MS B. O'NEILL, PRESIDENT
MR A. MORRIS, MEMBER
MAJGEN G. FOGARTY AO RETD, MEMBER

Appearances:

Ms K. Hagan for the ADF assisted by Flight Lieutenant L. Hawkett

Mr M. Guteridge for the Commonwealth assisted by Mr. N Doukas.

Witnesses:

Brigadier N. Juchniewicz DSC and Bar, CSC - Commander Special Forces Group;

Warrant Officer Class One P. Schwizler, OIC Workforce Cell and Special Forces Employment Category Manager

Warrant Officer K. Meier CSC Squadron Sergeant Major No 4 Squadron

Warrant Officer Class Two G. Warren, Special Forces Support Staff Trade Warrant Officer

¹ DMR/OUT/2023/19 Listing Application: Special Forces Salary Structure dated 20 September 2023.

² <https://www.dfrt.gov.au/matters/review-special-forces-paratrooper-and-specialist-operations-allowances>

³ ADF Submission - Matter 9 of 2023 – Special Forces Salary Structure Volume 1 Special Forces Operator (ADF1) page 7 paragraph 1.4.

⁴ ADF1 Volume 1 page 11 paragraph 1.11

⁵ ADF1 Volume 1 page 3 Foreword.

⁶ ADF1 Volume 1 page 63 paragraph 5.1.

⁷ ADF1 Volume 2 pages 6 and 7 paragraph 1.9.

⁸ Commonwealth submission Special Forces: Salary Structure (C1) page 1 paragraph 4.

⁹ C1 pages 18 to 20

¹⁰ C1 pages 21 and 22.

¹¹ Affidavit of Brigadier N. Juchniewicz DSC and Bar CSC (ADF2) page 3 paragraph 13.

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- ¹² ADF2 page 5 paragraph 21.
- ¹³ ADF2 page 5 paragraph 23.
- ¹⁴ Affidavit of Warrant Officer Class One P.Schwizler (ADF 3) page 3 paragraph 10.
- ¹⁵ ADF3 page 3 paragraph 10.
- ¹⁶ ADF3 page 5 paragraph 16.
- ¹⁷ ADF3 page 5 paragraph 17.
- ¹⁸ Affidavit of Warrant Officer K. Meier CSC (ADF4) page 3 paragraph 26.
- ¹⁹ ADF4 page 3 paragraph 12.
- ²⁰ ADF4 page 5 paragraph 22.
- ²¹ ADF4 page 7 paragraph 26.
- ²² Affidavit of Warrant Officer Class Two G. Warren (ADF5) pages 2 and 3 paragraph 8.
- ²³ ADF5 page 11 paragraph 36.
- ²⁴ ADF5 page 7 paragraph 24.
- ²⁵ ADF1 Volume 1 page 67 paragraph 5.9
- ²⁶ ADF1 Volume 1 page 9 paragraph 1.6.
- ²⁷ ADF1 Volume 1 page 9 paragraph 1.7
- ²⁸ <https://www.dfrt.gov.au/matters/air-force-combat-controllers>
- ²⁹ ADF Volume 1 page 60 paragraph 4.39a
- ³⁰ ADF1 Volume 1 page 61 paragraph 4.39b
- ³¹ Transcript 15 November 2023 page 33 lines 14 to 19.
- ³² ADF3 page 7 paragraph 22.
- ³³ ADF1 Volume 1 page 59 paragraph 4.32
- ³⁴ ADF1 Volume1 page 59 paragraph 4.32 and 4.33
- ³⁵ ADF4 page 6 paragraph 25a
- ³⁶ ADF1 Volume 1 page 100 paragraph 6.2
- ³⁷ C1 page 20 paragraph 82.
- ³⁸ ADF1 page 109 paragraphs 6.25 and 6.26.
- ³⁹ ADF1 Volume 1 page 100 paragraph 6.3
- ⁴⁰ ADF1 Volume 1 page 11 paragraph 1.10
- ⁴¹ ADF1 Volume 2 page 23 paragraph 4.6
- ⁴² ADF1 Volume 2 page 24 paragraph 4.9
- ⁴³ <https://www.dfrt.gov.au/sites/default/files/2021-02/Determination-11-of-2015-ADF-Allowances-Special-Forces-Amendment.pdf>
- ⁴⁴ ADF1 Volume 2 page 5 paragraph 1.6.
- ⁴⁵ ADF1 Volume 2 page 29 paragraph 4.27c
- ⁴⁶ ADF5 page 4 paragraph 14
- ⁴⁷ ADF3 page 8 paragraph 25.
- ⁴⁸ ADF5 page 5 paragraph 16.
- ⁴⁹ C1 page 21 paragraph 91.
- ⁵⁰ Transcript page30 lines 30 and 31.
- ⁵¹ Transcript page 31 lines 23 to 29.
- ⁵² Transcript page 22 lines 18 to 20.
- ⁵³ ADF1 Volume 1 page 103 paragraph 6.7
- ⁵⁴ Transcript page 74 line 37.
- ⁵⁵ Transcript page 36 lines 22 to 26.