

Productivity Commission's *New Models of Tertiary Education* (Draft Report):

University of Auckland response

21 November, 2016

Overview

The purpose of this submission is to provide the Productivity Commission with feedback on its draft report “New Models of Tertiary Education” (September, 2016). Overall the University of Auckland questions the Commission’s uncritical and partially-informed rejection of what it takes to be ‘traditional’ models for delivering higher education. In fact, teaching in New Zealand universities has been transformed over the last decade and now provides resources and mixed modes of delivery which are in line with those of peer universities abroad and show no signs of losing their appeal among domestic or international students. In particular, a significant move away from face-to-face learning of a kind the Commission appears to favour would put New Zealand universities at a significant reputational disadvantage and greatly reduce their attractiveness to high quality, full-fee paying international students. The assumption that a move to online provision would reduce costs is inconsistent with research which shows that online learning produces significant learning gains only with intensive staff input.

Overall, the Commission’s recommendations suffer from a failure to distinguish the distinctive pedagogical and related research roles of universities from the learning environment provided by polytechnics and other types of TEOs. Furthermore, the report’s vision for a tertiary system that supports new delivery models, while couched in the language of autonomy, would ultimately subject universities to much more restrictive controls at a national level. The proposed move to a market-driven quality regime based on outcome measures prescribed by industry and government would have a distorting influence on what universities do and how they behave. New Zealand industry has singularly failed to articulate a coherent sense of how universities may contribute to national well-being. With the exception of a few firms and accrediting agencies, it relies on empty shibboleths such as ‘work readiness’. Finally, the proposed dissolution of CUAP and the move to a new audit regime of measurement and monitoring using ex-post tools would elevate rather than reduce risk for students and for the reputation of a multi-million dollar export sector.

1. Policy & regulatory settings that promote ‘innovation’ at the expense of quality world-class higher education

The new regulatory and policy settings proposed by the Productivity Commission appear designed to create maximum destabilization for New Zealand universities which are operating in an already heavily constrained environment.

1.1. Granting of self-accreditation status to TEIs & dissolution of CUAP

Take for example, the proposed move towards self-accreditation (R12.11) and dissolution of CUAP, the University sector's collective self-governing body (R12.12). These changes are allegedly designed to speed up qualification approvals processes. They are also intended to promote fiercer competition between universities at the expense of inter-institution collegiality. The Commission's ill-informed interpretation of CUAP is that it serves primarily as a forum for universities to thwart the innovative proposals of peer institutions, rather than as a forum for universities to engage in constructive critique of the quality of programme design and delivery. The Commission appears to have overlooked an important function of CUAP. The function of peer-review has been an important long-standing dimension of the quality assurance system for the university sector. For example, universities rely heavily on reciprocal arrangements with peer institutions for the examination of masters and doctoral theses and the moderation of undergraduate assessment. Removing CUAP would remove a major national mechanism for peer review and would not promote greater quality of provision. Rather, the Commission's proposals work against quality provision by making reciprocal arrangements more politically fraught and costly for universities and by impeding the kind of inter-provider collaboration that is desired by the Commission to promote flexible pathways and greater choice for students (see Q12.2).

It is apparent from recommendations 12.11 and 12.12 that the Commission seeks to promote 'innovation' at the expense of 'quality'. These terms are taken to be synonymous. Not all 'innovative' programme designs represent 'quality' ideas and the CUAP forum plays an important role in challenging proposals that present a risk to students and to the reputation of New Zealand higher education by falling short of international quality standards. CUAP plays an important function in detecting regulatory and quality weaknesses in programmes *before they are put to market*. This is preferable to leaving students to find out *after the fact* that the programme that they invested in was of inherently poor quality. Losing this quality mechanism would be disastrous for students and for New Zealand universities which would be exposed to unprecedented legal and reputational risk.

The Commission provides no evidence that CUAP "stifles innovation" and plenty of evidence that the design and delivery of programmes are enhanced through processes it manages on behalf of the universities. For example, CUAP played a major

role in overseeing the development of the new Master of Māori and Indigenous Business, a unique postgraduate qualification that will be co-delivered by New Zealand universities to strengthen Māori management, leadership and governance capabilities for the greater good of society.

Furthermore, contrary to the Commission's claims that CUAP serves as a vehicle for vetoing or slowing down innovative proposals of universities, data provided by Universities New Zealand show that CUAP declines very few new programme proposals – 99.7% of proposals put to CUAP in the past three years were approved and 100% of requests put through under urgency were completed through truncated processes. This is not because CUAP is not discriminating, nor an unnecessary step in the process, but because universities are working closely to CUAP's framework which is an interpretation of NZQA's requirements (and which would form the basis of a post-offering audit). There is no second guessing for universities and this is a good thing.

1.2. Increased emphasis on ex-post quality controls & outcome measures

The Commission's suggested disbandment of CUAP and move to ex-post quality controls (R12.2) would elevate rather than reduce financial risk for students, who would in effect become guinea pigs for new provision. The examples of "ex-post controls" provided in the report (such as the use of undercover auditors "posing as students" to conduct covert assessments of aspects of provision) are openly hostile, and convey an unjustified mistrust of the sector. This machinery would also be unproductively expensive and have a detrimental impact on the learning environment of real students.

The introduction and reporting of value-add measures for providers (R12.4) is good in principle, but if these measures are unsophisticated or too narrowly set by the Ministry of Education and the Tertiary Education Commission they would inevitably have a distorting influence on what universities do and how they behave. This goes against the language of autonomy that is pervasive in the report. For example, if society conceptualizes universities as sites for equipping individuals with a broad, critical liberal education for the broader benefit of society (i.e. rather than solely as sites for preparing individuals for immediate employment and addressing industry skill shortages), then it would be difficult to quantify the "value-add" measures for universities in any meaningful way at an institutional level and without full scale social

science research. A better approach would be to provide opportunities for universities to show that they are delivering on their graduate profiles.

To date the outcome measures developed and used by TEC have not been sophisticated or useful. For example, the completion rate measurement has been particularly problematic and while TEC has gone back to using a cohort-based measure it is still not robust as it focuses on absolute percentages rather than variability.

2. Unfounded claims about university strategy & operations

The Commission makes a series of unfounded claims about universities' lack of responsiveness to students and their limited investment in quality teaching comparative to research. These claims form the basis of a series of recommended changes designed to correct this 'inertia', 'protect the interests of students' and increase 'productivity' within the system at large. These changes include the development of a national performance framework for tertiary teaching (R12.16), allowing for easier credit transfer between providers (R12.18) and exploring a student education account (SEA) as an alternative (client-focused) service model for subsidizing the provision of services (F12.12). The University challenges several of the Commission's claims that underpin their proposals.

2.1. Claims about universities' limited incentives to invest in teaching

The report claims that universities have no external incentives to work towards improving the quality of their teaching relative to research (F6.1) and that this conspires to reduce our responsiveness to students and their needs (F8.16). This claim reflects a fundamental misunderstanding by the Commission about how universities are funded and the nature of a university's core business. In common with other New Zealand universities, teaching is at the heart of our mission and our students sustain us. Student fees and government tuition funding account for over half of the University's total revenue¹ and this alone is a strong imperative to maintain the highest possible standards of teaching and learning quality. The University reinvests its student-related revenue directly into teaching.² In addition over half of a

¹ SAC funding and student tuition fees accounted for 54% of the University's total revenue in 2014 and 56% in 2015

² For example income from tuition fees and government subsidies covers 60% of the University's academic staffing costs.

University's PBRF funding is derived from research degree completions (RDC) – a teaching-supported research portfolio.³ That the University of Auckland consistently claims the highest share of PBRF funding derived from RDCs than any other New Zealand university is a direct reflection of our significant investment in high quality, research-informed teaching.⁴

In addition to these strong external incentives to invest in the quality of its teaching, the University enhances teaching capability through investing heavily in teaching and learning infrastructure. For example a large proportion of our new Science Tower and Owen Glenn Building is allocated for teaching and learning purposes. We enhance teaching capability through staff professional development programmes and fostering institutional cultures that value teaching and promote best practice. The University utilizes student survey data, peer review, course completion information and reports from accrediting bodies and academic unit reviews, to monitor the quality of its teaching and student responses to it, and to identify and promote best practice. Since 2013, revised standards for academic performance have been in place for continuation and promotion purposes. These standards provide clear specifications of acceptable levels of performance in teaching, research and leadership/service and are part of a career advancement process where teaching performance is on a par with research performance, and promotion depends upon high levels of performance in all areas. Professional development in teaching is supported by research and training provided by the University's Centre for Learning and Research. The impact of these measures is apparent in student survey data and in the national recognition of teaching excellence. Twenty-five University of Auckland teachers have been awarded a national Tertiary Teaching Excellence Award (TTEA) since they were introduced in 2001 -- a reflection of the University's investment in the quality of teaching.

Significantly, the Commission has not considered the academic unit and programme reviews conducted by NZ universities. These reviews, conducted on a regular basis, provide evaluation of teaching and research by panels which include a range of senior academics from leading international universities. Recent review panels at the University have included senior professors from UCLA (2016), Princeton University (2016), University College London (2016), University of California (Berkeley) (2015, 2016), University of Essex (2015), University of Glasgow (2014), as well as staff from Go8 universities in Australia.

³ Approximately 60.5% according to Uniforum

⁴ For example in 2014 the University claimed 32% of the total national PBRF RDC funding (followed by Otago which claimed 16.5%)

Should a national framework for assessing and rewarding tertiary teaching performance (R12.16) be introduced in New Zealand, it is important for universities like the University of Auckland that such a framework adequately recognize the value of research-informed teaching that is important to research intensive universities like ours competing for international standing. This is a point that we feel is important to make in the context of the Commission's statements about the lack of complementarities between teaching and research in Chapter 6 and the subsequent proposal to relax the statutory requirements for research-led teaching of degrees (R12.7).

2.2. *Claims about universities' inefficient use of assets, including land*

The claim that the Commission's recommendation that Tertiary Education Institutions (TEIs) contribute to their local communities by paying rates (R12.21) would encourage TEIs to use their assets (including land) more productively is unjustified. The Commission's claims about inefficient use of resources, including land are unfounded, and R12.21 would simply impose additional costs on universities without reaping the claimed benefits of increased productivity. Just about every square inch of the University of Auckland's land is utilized heavily and our teaching facilities are so heavily used that it is a challenge to undertake scheduled maintenance of teaching rooms over the summer period.⁵ The University is already actively using technology to maximize existing space.

The University has continued to invest heavily in the development of its key campuses to support the growth of taught and research qualifications and in research activity, particularly in Engineering, Medicine and Science. The University has sold its land associated with the Tamaki Campus to free up funds for new capital initiatives such as the development of the Newmarket Campus, a new Science Tower and approval for a new Engineering building. These developments allow us to accommodate growth in Science and Engineering EFTS in line with national priorities and government investment. We have also signaled an intention to sell the Epsom Campus once we have constructed alternative facilities on the City Campus.

The Commission's recommendation appears to be designed to destabilize the asset base of universities in order to force them into less space-dependent provision, i.e.

⁵ The University of Auckland is occupying 80+% of its available space which is well above international benchmarks

more online provision – the “new model of university education” envisioned by the Commission, and the overarching agenda driving this inquiry.

2.3. *Uncritical belief in the value of online provision*

R12.21 is a veiled attack on campus-based, face-to-face learning. This includes blended learning which requires not less space but in most cases a redesign of existing space to accommodate active learning assisted by technology. Since 2013, ECAR studies⁶ continue to find that the absolute majority of students say they learn best with a blend of face-to-face and online learning, rather than in purely online modes. In 2016 ECAR reported that only 7% of respondents claimed to prefer fully online learning (Brooks, 2016, p. 6). In addition a number of meta-analyses have found that blended learning offers significant pedagogical advantages relative to fully online learning modes (Means, 2009; Tayebinik & Puteh, 2012).

International research highlights that social interaction and a sense of teacher “presence” are integral to the perceptual process. Separation of the instructor from the learning and learners from each other often leads to feelings of isolation on the part of participants and has been a major cause of learner dissatisfaction in the online learning environment (Palloff & Pratt, 2007). Lehman and Conceição-Runlee (2010) note that understanding the concept of ‘presence’ and how to replicate it in an online instructional environment is highly complex and requires sophisticated pedagogical design and significant staff input to ensure that online learning meets quality standards and delivers effective learning outcomes. In light of these findings, it is no surprise that Massey University, New Zealand’s leading university for distance learning, reports the lowest completion and retention rates in the university sector (see Table 1 on page 10). This is not a reflection on Massey’s teaching performance but on the unavoidable challenges of online learning for any provider and the significant implications that distance learning has for student achievement. The Commission’s report does not acknowledge the potential negative impact that extending online provision in New Zealand would have on non-traditional learners (e.g. first-in-family students) who are less well-prepared for tertiary study. These findings highlight the risk in over-investing in purely online delivery formats as a means of reducing costs (by ‘scaling up’ provision) and the need the need for careful consideration of the quality implications of expanding online provision in New

⁶ An large, international longitudinal study of undergraduate students and IT

Zealand. The University is concerned by the notable absence in the report of reflection by the Commission on these critical quality issues.

There is also no evidence to support the claims that leading international universities are moving away from campus-based teaching models, or that those who aspire to attend them would regard off-campus degree-level studies as an acceptable alternative for which they would pay high fees. Feedback gathered from our internal quality processes clearly indicates that international students do not wish to pay high international fees for online-only delivery. The development of a residential campus is central to the University's international student recruitment strategy. Any erosion of the residential learning would have a serious adverse impact on the sustainability of universities and for parts of the domestic economy that rely on international students.

The University of Auckland, like other universities, is actively pursuing the opportunities presented by online education but it is doing so strategically and where there are clear benefits for distinctive constituencies of learners and the University. For example, the University has expanded its Massive Open Online Course (MOOCs) offerings to provide global access to University of Auckland staff expertise in popular curricula areas (e.g. introductory data analysis, academic integrity, and logical and critical thinking). We have repurposed our *Logical and Critical Thinking* MOOC for University of Auckland students and now offer this course in both an enhanced face-to-face mode and online mode to provide flexible access options for students. We also offer a range of niche postgraduate courses in an online mode to cater to the professional needs of more experienced learners. Another innovation in e-learning is the development of a STEM Online School, a joint initiative between the Faculties of Education and Social Work, Engineering and Science which seeks to increase the number of secondary school students successfully completing NCEA studies in Science, Technology, Engineering & Mathematics (STEM) subjects through the provision of online training support to students, teachers and schools particularly in the schools that find it difficult to recruit and retain experienced teachers for those subjects.

Table 1: Relative results across EPIs (Massey University vs. University Sector, 2015)

Cohort-based qualification completion

This measures the number of learners out of a starting cohort who successfully complete at the same level after a given time-frame.

	Name	Rate
	University subsector median	62%
	All of sector median	64%
1	University of Otago	70%
2	University of Auckland	69%
3	University of Waikato	67%
4	Victoria University of Wellington	64%
5	University of Canterbury	60%
6	Auckland University of Technology	57%
7	Lincoln University	46%
8	Massey University	45%

First year retention rate

This rate measures, for longer qualifications, how many learners re-enrolled in the same level in the year after they enter the cohort.

	Name	Rate
	University subsector median	76%
	All of sector median	60%
1	University of Auckland	82%
2	University of Otago	82%
3	Auckland University of Technology	78%
4	Victoria University of Wellington	77%
5	University of Canterbury	76%
6	Lincoln University	76%
7	University of Waikato	74%
8	Massey University	68%

Reference: <http://archive.tec.govt.nz/Reports/2015/Massey-University-Cohort-Based.pdf>

2.4. Claims about universities being 'locked' into predetermined delivery patterns by EFTS funding system

A further claim made by the Commission is that caps on the enrolment of domestic students means tertiary providers are allocated certain number of EFTS for whom they must deliver a certain mix of programmes at specified levels on the NZQF. As a consequence, TEIs are “locked into a predetermined pattern of delivery with limited options to adjust delivery in response to changes in student demand” (F5.7).

On the contrary, the University’s delivery is highly responsive to student enrolments. Our annual forecasting and investment plan processes ensure that the mix of our provision is highly responsive to student enrolments. For example, the University has responded to student demand for increased access to Engineering and Science by students and government, by shifting funding internally to lift intakes to Engineering, Science and Technology and by heavy capital investment to support the programmes. We introduced new programmes in Information Technology (Master of Information Technology and Postgraduate Certificate in Information Technology) to support the development of ‘industry ready’ graduates with both specialist knowledge and skills, and an understanding of the workplace norms.

We also ensure that our mix of provision retains a comprehensive range of disciplines, as expected of a highly-ranked research-led university, which enables students to access interdisciplinary programmes and conjoint undergraduate degrees that provide enhanced employment and postgraduate study outcomes. It is also important for us to maintain the viability of our highly ranked Humanities and Social Sciences subjects that make significant contributions to our overall rankings and to the attractiveness of the University to high quality domestic and international students.

2.5. Claims that universities make it difficult for students to transfer credit between institutions out of reasons of self-interest

The Commission claims that Tertiary Education providers make it difficult for students who seek to transfer credit between institutions part way through a programme of study by imposing ‘high switching costs’ on students (F8.10). The Commission’s assertion is that providers impose “undue barriers to RPL” in order to “lock” learners into their programmes as they do not wish to lose revenue in the form of SAC or EPI funding. The Commission notes a systemic shortage of articulation agreements between providers to facilitate ease of movement between various providers in the

tertiary education system, but is vague about precisely what 'switching costs' universities impose on students. In the absence of any other evidence, this seems to refer to the fact that students might need to add 'make-up' courses when switching providers, and that little effort is made by universities to design their programmes so that that interface with others in the sector.

The Commission's proposed solution is for TEC to adjust the way that qualification completions are measured for funding purposes (R12.5). However changes in funding incentives are unlikely to lead to more transfer opportunities because such decisions made within universities are based entirely on academic rather than financial grounds. Universities have a duty of care to ensure that transferring students are not exposed to risk by entering a programme without sufficient academic preparation. Universities also have a public responsibility to protect the academic integrity and value of their degrees for the ultimate benefit of students who graduate from them (and seek to use these qualifications as leverage in the job market). They also have a positive incentive to attract appropriately prepared students from other institutions. Switch costs are typically imposed by current providers (banks, power companies) not by those to whom consumers wish to join.

2.6. *Claims that a 'mix and match' system of tertiary education will increase student choice*

The Commission envisions a system where learners can accumulate courses across several providers towards a qualification: *"If the tertiary system was truly student-centred, learners would be able to build up qualifications across several providers"* (COMET Auckland, sub. 50 as cited on p. 69). This thinking, expressed in a single submission to the inquiry, appears to be the basis for R12.6 in which the Commission proposes a student-driven 'mix and match' system of tertiary education. This recommendation carries with it the idea that degrees are in effect 'unbundled' - a concept that emerged amid the hype surrounding MOOCs. This vision of 'unbundling' which the Commission appears to have in its sights as a means of catering to student-demand and facilitating greater movement of learners within the sector (particularly between polytechnics and universities) is deeply flawed.

Degree programme are coherent courses of studies not incidental collections of units. Institutions differentiate themselves each other by providing distinctive programmes. 'Unbundling' would undermine this and risk the coherence of qualifications. The concept of 'unbundling' across the sector is premised on the standardization of the

content and structure of tertiary degrees – i.e. a ‘one size fits all’ approach – which, to use the Commission’s own words, is what stifles innovation. It is based on the notion that each provider can contribute a focused module or ‘bite-sized’ piece of a larger qualification that the sector (rather than individual provider) can competently deliver as a collective. The standardization of degree structures and curriculum that would be necessary to make all of these modules ‘fit together’ presents a major barrier to innovation. Universities need to be free to explore new approaches in order to deliver programmes that match relevant graduate profiles in a changing environment. The Commission also fails to acknowledge that the most significant innovation often occurs at the programme not the course level. Take for example, the radical overhaul of the undergraduate degrees at the University of Melbourne, and more recently the University of Sydney. Both are instances of degree level innovation designed to advance the universities’ strategic position within the HE market place through the delivery of ‘signature’ undergraduate degrees designed to meet the changing needs of those institutions’ students (but not necessarily of all students in the sector).

The Commission’s ‘mix and match’ system would be undesirable to domestic and international students seeking a world-class university education as it would erode the University’s ability to deliver distinctive and competitive degrees. A tertiary system without ‘heavy hitting’ research universities such as Auckland and Otago would work against the Commission’s stated objectives for a system that allows for greater provider differentiation and would be disastrous for the reputation of New Zealand’s higher education and economy. Why not support the nation’s leading universities to maximize their advantage? The Commission’s argument that regulatory measures should be put in place to stop the ‘big getting bigger’ requires that success be penalized and goes against the interests of the nation.

3. Increasing transfer / articulation opportunities in the tertiary sector

The Commission invites feedback on the measures that can be taken to encourage providers to enter into articulation agreements to provide pathways for students to study across providers (Q12.2).

Inter-provider collaboration within the tertiary sector is currently made difficult not only by the competitive funding environment but also by the functional overlap between tertiary education providers. While there is broad differentiation of functions

between TEIs which have made some formal partnerships possible,⁷ there are no fixed divisions between the types of courses offered by each provider. The focus is on their ability to offer education to the required quality standards, rather than based on their type. Allowing a deluge of new entrants into the market and granting them university status based on the provider's 'characteristics' (R12.26) in combination with the proposed relaxing of statutory requirements for research-led teaching of degrees (R12.17) is likely to increase the presence of multi-level institutions offering courses at all levels of the NZQF. While the Commission may see this as increasing choice for students, the proliferation of pop-up TEIs would make it even more difficult for providers to co-ordinate their efforts and resources to provide a coherent, single continuum of opportunity for students through tertiary education.

International experience shows that the key to collaborative provision is a properly tiered system of higher education, with mutual recognition of qualifications. Two international models of successful collaboration in the post-secondary sector are the California College System and the VET/HE system in Australia.

California's public system of higher education in the United States introduced in 1960 by the Master Plan of Higher Education is a three-tier system of community colleges, state universities and research institutions that provides a single continuum of educational opportunity, from small private colleges to large public universities. California has invested heavily in a community college system as way of making the bachelor's degree as accessible as possible to a broad range of Californians and has successfully used this model to broaden access to higher education. A key feature of this system is the ability of students to undertake a two-year Associate Degree at and transfer to a four year University degree with two years of credit. This encourages students from diverse socio-economic and ethnic backgrounds to engage in post-secondary education and to gain higher qualifications at less expense. The University of California, the state's premier research university, reports that transfer students who enrol at UC repeatedly demonstrate their ability to succeed, posting high graduation rates comparable to those of freshmen who began college at a UC campus.⁸

Similarly in Australia, there is a strong continuum between the Vocational Education and Training (VET) and Higher Education Sectors. The 'Associate degree' provides a bridge to bachelor degree study. Like the Californian system, an Associate degree is a

⁷ For example, the University of Auckland has partnered with MIT to deliver a selection of undergraduate and postgraduate courses at MIT (Otago Campus) and Massey University collaborates with Unitec to deliver a Certificate of University Preparation at its Albany Campus.

⁸ Preparing California for Its Future: Enhancing Community College Student Transfer to UC (UC, 2014)

two-year qualification with the option to fast-track into further study with credit exemptions for studies completed. An Associate degree can be undertaken after year 12 (final year of secondary school) or following a Certificate III or IV. It provides a solid grounding in a subject area, and good employment outcomes. It is also more academically focused than an Advanced Diploma and therefore a better pathway to degree study for students.

In summary, a focus on streamlining pathways and on providing a continuum for students rather than the 'mix and match' approach advocated by the Commission is the internationally proven way to increase inter-provider collaboration.

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