SUN COUNTRY TOURS

EMERGENCY ACTION PLAN

Revision History

<table>
<thead>
<tr>
<th>Revision</th>
<th>Date</th>
<th>Description of Change</th>
<th>Initiator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft</td>
<td>April 2005</td>
<td>Draft</td>
<td>Dennis Oliphant</td>
</tr>
</tbody>
</table>
SUN COUNTRY RAFT TOURS EMERGENCY ACTION ACTION PLAN

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INTRODUCTION TO THE PLAN

Purpose

This Emergency Action Plan describes a set of pre-selected activities, intended to guide the response to an accident, which has been pre-approved by the managers of Sun Country Raft Tours.

The Emergency Action Plan does the following:
1. Assigns responsibilities for action.
2. Preplans actions to be taken in different potential emergencies.
3. Identifies resources for responding to an emergency.

Definition of an Emergency

The circumstances that might trigger use of this Emergency Action Plan are when any staff or guests become:
- Lost.
- Seriously, or fatally ill or injured.
- Involved in criminal activity, a natural disaster, or any other situation likely to attract media attention.

Triggering the Plan

Any time a call is placed to 911 or anticipated to be placed, or a call is placed, or anticipated to be placed to law enforcement or emergency personnel:
- A Trip Leader or designated Guide calls the SCT office and where possible speaks directly to the General Manager or owner.
- The SCT response to any emergency may involve co-ordination or interaction with county sheriffs, search and rescue teams, and land management agencies. The initial liaison is through the on-scene Guide (Trip Leader) managing the on-scene response.
EMERGENCY ACTION PLAN

Version: Draft
Released:
Next Review: Feb 2006

Number _______ of _________

Major Tasks within the Plan

The Plan includes a check list:

- organizing and managing an initial response
- internal communications and managing the media
- handling next of kin
- incident investigation/review
- post incident follow ups and conclusion

Assigning Responsibilities for Action

Responsibilities may be combined. There is a rationale for assigning responsibilities along Incident Command System lines. This is given in the appendix “Incident Command System”, and more is given in the AO management disk.

<table>
<thead>
<tr>
<th>Responsibility</th>
<th>Function and Required Skills</th>
<th>Who</th>
</tr>
</thead>
<tbody>
<tr>
<td>Command</td>
<td>Responsible for leadership, decision-making, and oversight of the entire operation. This responsibility requires management experience, knowledge of Search and Rescue operations, diplomacy skills, and a broad sensitivity to organizations’ interests. This is usually the most senior executive, but may be his nominee.</td>
<td>Owner - Dennis</td>
</tr>
<tr>
<td>Planning</td>
<td>Responsible for gathering relevant data about the incident and developing strategies for successfully concluding it. The General Manager or senior staffer nominated by the owner.</td>
<td>GM - John Cramp</td>
</tr>
<tr>
<td>Operations</td>
<td>Responsible for conducting Search and Rescue operations in the field/organizing the response in the field. This may be the Trip Leader or a nominated SCT person in the field.</td>
<td>Trip Leader</td>
</tr>
<tr>
<td>Logistics</td>
<td>Supports the Search and Rescue operations with vehicles, food, equipment, and facilities. The Owner, GM or MOD may perform this function.</td>
<td>See emergency contact list</td>
</tr>
<tr>
<td>Finance</td>
<td>This function regulates expenses for services used on major incidents. Typically the Owner or GM.</td>
<td>Owner/GM</td>
</tr>
</tbody>
</table>

Acknowledgement

Much of this Plan is based on resource material provided by America Outdoors. This material is gratefully acknowledged.
THE EMERGENCY ACTION PLAN

Emergency Contact Numbers are:

- **John Cramp**  
  (cell) 541-610-2181  
  (home) (541) 389-6230
- **Cate Bernard**  
  (cell) 541-610-2182  
  (home) (541) 390-4557
- **Dave Sims**  
  (cell) 541-610-2182  
  (home) (541) 312-8302
- **Dennis Oliphant**  
  (cell) (541) 410-1126  
  (home) (541) 389-9100

Management Procedures (Command and Planning)

Check Lists For Command (Dennis) and Planning (John)

A. The Immediate Response

1. What is this Emergency? Where is this Emergency?

IF THERE HAS BEEN A FATALITY:

Is the scene safe for everyone?

**HAS 911 BEEN CALLED**

Are the guests AWAY from the dead body? (Except Family Member, perhaps)

Is the scene stable and safe for law enforcement?

Are all guests and staff accounted for?

- **Get a manager on scene.**

  Confirm exact identity of deceased. (Generate list of ALL trip participants and staff with contact details)

  Can we move the guests out of there?

  Do we need to Replace any staff?

  Instruct photographer to document scene, as appropriate
Notify next of kin – deceased, injured, non-injured. See “Contacting next of kin”, or red file in admin office BUT FIRST

Activate “Media Response Plan”, in Admin offices risk management folder, before commencing these calls

Immediately address post trip psychological and emotional needs of guests and staff

2. Which trip?

3. Who is in charge at the scene? Trip Leader?

4. What phone are they on?

5. How many injured persons?

6. What kind of injuries do people have?

7. Has 911 been called? Time? **Ask the caller to call 911 if needed**

8. Who is involved? COPY TRIP MANIFEST FOR PARTICIPANT NAMES (at the same time have copies made of participant releases).

9. Which drivers/guides are on this trip?

10. Are ALL the guests and staff safe and accounted for?

11. What is being done? What care has been given?

12. What plan is being made for the injured?

13. What plan is being made for other guests?

14. What more is needed? Are additional resources needed? (Hospital/Doctor phone numbers, directions to hospitals)
B. The ongoing response

Assign responsibilities

| Responsibility | Function and Required Skills | FOR THIS INCIDENT
| Who |
|----------------|------------------------------|----------------------|
| Command        | Responsible for leadership, decision-making, and oversight of the entire operation. This responsibility requires management experience, knowledge of Search and Rescue operations, diplomacy skills, and a broad sensitivity to organizations’ interests. This is usually the most senior executive, but may be his nominee. **Owner - Dennis** | |
| Planning       | Responsible for gathering relevant data about the incident and developing strategies for successfully concluding it. The General Manager or senior staffer nominated by the owner. **GM- John Cramp** | |
| Operations     | Responsible for conducting Search and Rescue operations in the field/organizing the response in the field. This may be the Trip Leader or a nominated SCT person in the field. **Trip Leader** | |
| Logistics      | Supports the Search and Rescue operations with vehicles, food, equipment, and facilities. **The Owner, GM or MOD may perform this function.** | |
| Finance        | This function regulates expenses for services used on major incidents. Typically the **Owner or GM.** | |

<table>
<thead>
<tr>
<th>Time</th>
<th>Action</th>
<th>Who</th>
<th>Contact#</th>
<th>Task Status and Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Provide first aid, rescue and evacuation services for injured party(s)</td>
<td></td>
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<tr>
<td></td>
<td>Clearly identify incident response roles and responsibilities</td>
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<tr>
<td></td>
<td>Run Procedures by <strong>Department</strong></td>
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<td></td>
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<tr>
<td></td>
<td>Contact company management/other response team members</td>
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<tr>
<td></td>
<td>Dispatch Manager to scene, if needed. Take clothing, if needed</td>
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<tr>
<td></td>
<td>• Manager should stay with group through conclusion. Directive by phone/radio is inappropriate unless the only option</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Implement <strong>media plan</strong> Internal communications to:</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>• Staff</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>• Resort where trip originated</td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td>• Attorney</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>• Insurance rep</td>
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</tr>
</tbody>
</table>
**External communications to:**
- Next of kin
- Law enforcement
- Permitting agencies
- Media

Inform all staff Media Plan is in place – refer all calls to designated person

Media Response Person is

Media Guide on site is

Communicate with staff – PIRF posted

**Emotionally stabilize and make decisions on trip outcome for all other guests**
- Reorganize operational logistics if necessary – cancel, continue, replace staff for this and subsequent trips

Dispatch staff member to ER, if needed
Take clothes, if needed

Determine needs of other trip guests
- Transportation, dry clothes etc

**Instruct TL witness reports are essential**

Contact family of injured party, log all contact (template similar to media contact worksheet). Read Guidelines

Notify friends or relatives who might be concerned about guest welfare, as appropriate

Contact company’s critical incident stress facilitator

Contact attorney D.O.

Contact insurance company D.O.

**Paperwork:**
- Assemble incident and witness reports and photos – drafts need to be available almost immediately
- Have staff pull the waiver and release forms - COPY THEM
- Relevant staff bios pulled

**B. POST INCIDENT**

Provide ongoing open, supportive
<table>
<thead>
<tr>
<th>Communication with family and key relationships of injured party.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DESIGNATE FAMILY RELATIONS COORDINATOR</strong> (see <a href="#">Guidelines for communicating with Next of Kin</a>)</td>
<td></td>
</tr>
<tr>
<td>• Ongoing psychological and emotional needs</td>
<td></td>
</tr>
<tr>
<td>Ensure reports and documentation are complete:</td>
<td></td>
</tr>
<tr>
<td>• Water temperature/flows, weather, equipment/site documentation including photography</td>
<td></td>
</tr>
<tr>
<td><strong>Internal</strong> and/or <strong>External Review?</strong></td>
<td></td>
</tr>
<tr>
<td>External review is triggered by fatality, near drowning, hospitalization, transport requiring ALS, spine or head injury, other severe trauma</td>
<td></td>
</tr>
<tr>
<td>Determine if attorney needs to order external review</td>
<td></td>
</tr>
<tr>
<td>Post trip psychological and emotional needs of staff. Perform critical incident stress debriefs with participating staff and whole company.</td>
<td></td>
</tr>
<tr>
<td>Continue with <a href="#">Media Plan</a></td>
<td></td>
</tr>
<tr>
<td>Manage ongoing legal issues</td>
<td></td>
</tr>
<tr>
<td>Re-analyze and update Risk Management and Emergency Response Plan</td>
<td></td>
</tr>
<tr>
<td>Evaluate and update insurance policy</td>
<td></td>
</tr>
<tr>
<td>Provide ongoing emergency response training with field and office staff</td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**
Procedures by Department

Emergency Procedures - Guides

IF THERE HAS BEEN A FATALITY:

• Make the scene safe for everyone.
• Get the guests AWAY from the dead body. (Except Family Member, perhaps)
• Confirm exact identity of deceased

CALL SCT 541.382.6277, or 800.770.2161, John (cell) 541-610-2181 (home) 541-389-6230; Cate (cell) 541-610-2182 (home) 541-390-4557; Dave Sims (cell) 541-610-2182 (home) 541-312-8302; Dennis (cell) 541-410-1126 (home) 541-389-9100

• Organize and communicate with the guests the FACTS and tell them you are making a plan.
• Make the scene stable and safe for law enforcement.
• Get the guests out of there.
• Instruct photographer to document scene, as appropriate

1. Provide CARE--designate two guides: one to direct FIRST AID and one for COMMUNICATIONS

• Call Emergency Services IF REQUIRED--Tell them if Injured is ON SHORE, if ON SHORE
  • Any emergency: 911, expect minimum 15 minute response time
• Treat injuries
• Communicate sympathy for their misfortune
• DO NOT COMMUNICATE LIABILITY OR APOLOGY (i.e. "I shouldn’t have taken that line.")

2. CALL SCT

• Bend office 382-6277, (800) 770-2161 Dispatch (541) 610-2183
• John Cramp (cell) 541-610-2181 (home) (541) 389-6230
• Cate Bernard (cell) 541-610-2182 (home) (541) 390-4557
3. Complete INCIDENT REPORT--In First Aid Kit

4. ORGANIZE
   • All Trip Participants
   • Continuation of trip, or transport of all guests
   • Transport/Evacuation of Injured

5. CONTAIN
   • Any statements you make regarding the incident need to be basic, boring statements
     • i.e. (a boat flipped and one person received a head wound from contact with a rock, first aid has been applied, victim is being transported to medical care)
     • DENNIS IS MEDIA CONTACT--DIRECT ALL MEDIA INQUIRIES TO DENNIS
     • Guides are unable to comment on the situation.

J:\Administration\Risk Management\Emergency Resources\Emergency Procedures per Department\Emergency Procedures - Guides.doc
Emergency Procedures - Drivers

**IF THERE HAS BEEN A FATALITY:**

1. Make the scene safe for everyone.

2. Call 911

3. Get the guests AWAY from the dead body. (Except Family Member, perhaps)

4. **Confirm exact identity of deceased**

   CALL SCT 541.382.6277, or 800.770.2161, John (cell) 541-610-2181 (home) 541-389-6230; Cate (cell) 541-610-2182 (home) 541-390-4557; Dave Sims (cell) 541-610-2182 (home) 312-8302; Dennis (cell) 541-410-1126 (home) 541-389-9100

5. Organize and communicate with the guests the FACTS and tell them HELP IS ON THE WAY

6. Make the scene stable and safe for law enforcement.

**IF THERE HAS BEEN AND INJURY OR INCIDENT**

6. **Provide CARE**

   - Call Emergency Services IF REQUIRED--Tell them if Injured is ON SHORE, if ON SHORE
     - Any emergency: 911, expect minimum 15 minute response time
     - Treat injuries
     - **COMMUNICATE SYMPATY** for their misfortune (i.e. I'm sorry you've been injured--we'll do our best to take care of you."
     - **DO NOT COMMUNICATE LIABILITY** (i.e. "I shouldn't have turned so fast".)

7. **CALL SCT**

   - Bend office 382-6277, 800.770.2161 Dispatch (541) 610-2183
   - **John Cramp** (cell) 541-610-2181 (home) (541) 389-6230
   - **Cate Bernard** (cell) 541-610-2182 (home) (541) 390-4557
   - **Dennis Oliphant** (cell) 541-410-1126 (home) (541) 389-9100
   - **Dave Sims** (cell) 541-610-2182 (home) (541) 312-8302

8. **Complete INCIDENT REPORT--In First Aid Kit**
9. ORGANIZE
   • All Trip Participants
   • Transportation of Guests and Injured

10. CONTAIN
   • Any statements you make regarding the incident need to be basic, boring statements
   • i.e. (bus rolled off the road, four persons suffered head wounds from contact with inside of the bus, first aid has been applied, victims are being transported to medical care)
   • DENNIS IS MEDIA CONTACT--DIRECT ALL MEDIA INQUIRIES TO DENNIS
   • Drivers are unable to comment on the situation.

J:\Administration\Risk Management\Emergency Resources\Emergency Procedures per Department\Emergency Procedures - Drivers.doc 5/8/04
Emergency Procedures – Photographers

1. Work as DIRECTED

- Trip leaders are trained in emergency procedures. Do what they say.

- **You may be asked to give up your phone or get assistance.**

- If you're asked to call 911 . . .
  - Tell them the victims are ON SHORE if they are ON SHORE. Follow the dispatcher’s prompts.

- Where is the incident

- Give them your phone number

- Stay online with 911 till they tell you to hang up

- Call Dispatch (541)610-2183, or the office: (541) 382.6277 : if you can do so without leaving the scene. If you cannot reach Dispatch,

  **Call:**  
  John Cramp (cell) 541-610-2181 (home) (541) 389-6230  
  Cate Bernard (cell) 541-610-2182 (home) (541) 390-4557  
  Dennis Oliphant (cell) 541-410-1126 (home) (541) 389-9100  
  Dave Sims (cell) 541-610-2182 (home) (541) 312-8302

2. Stay CONNECTED

- Standby a radio

- Monitor the situation

- Relay information, if asked

- Don't be an active rescuer, if possible.

- Take photos of the scene (with discretion)
• Take notes (boring facts: Time, Location, Injuries, Witnesses) Do not speculate on how and why

3. Stay CONTAINED

• Dennis—ONLY—Talks to the Media, or to the Public about the situation.
• The rest of us “are unable to comment on the situation”. Period.
• NOTES

J:\Administration\Risk Management\Emergency Resources\Emergency Procedures per Department\Emergency Procedures - Photographers.doc
Emergency Procedures – Office Staff

4. Get INFORMATION

- Where is the emergency?

- What Radio or Phone are they on?

- GET JOHN, CATE, DAVE, OR DENNIS, NOW

- How many injured persons?

- What kinds of injuries do people have?

  (ANY BREATHING PROBLEMS, bleeding, unconsciousness, broken bones)

- Has 911 been called?

  Ask the caller to call 911 if needed.

5. Get ASSISTANCE

- Connect the caller to John, Cate, Dave, or Dennis

- If John, Cate, Dave, and Dennis are not in the office, try to call them:

<table>
<thead>
<tr>
<th>Name</th>
<th>Cell Phone</th>
<th>Home Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Cramp</td>
<td>(cell) 541-610-2181</td>
<td>(home) (541) 389-6230</td>
</tr>
<tr>
<td>Cate Bernard</td>
<td>(cell) 541-610-2182</td>
<td>(home) (541) 390-4557</td>
</tr>
<tr>
<td>Dennis Oliphant</td>
<td>(cell) 541-410-1126</td>
<td>(home) (541) 389-9100</td>
</tr>
<tr>
<td>Dave Sims</td>
<td>(cell) 541-610-2182</td>
<td>(home) (541) 312-8302</td>
</tr>
</tbody>
</table>

- If John, Cate, Dave, or Dennis is still not available, assign someone to track them down!

3. Stay CONNECTED

- Ask them: What can we do in the office to help you?
Standby a radio/phone to monitor the situation and continue to assist.

4. **Stay CONTAINED**

- *Dennis—ONLY—Talks to the Media, or to the Public* about the situation.

- The rest of us “are unable to comment on the situation”. Period.

NOTES

J:\Administration\Risk Management\Emergency Resources\Emergency Procedures per Department\Emergency Procedures - Office.doc
Media Plan Procedures and Work Sheets

1. HAVE ACCURATE INFORMATION

- What is the nature of the emergency?______________________________________________________

- Where is the emergency?_______________________________________________________________

- How many injured persons?________ Nature of injuries:__________________________________

- What is being done________________________________________________________________________

- Pull the Red File “Media Response Plan” in Admin office/risk Management

- Is media at the scene?___________________
  Who?_____________________________________

- Who is the “Media Guide”?_____________________________________________________________

2. Set ROLES

- Remind the “Media Guide” how to handle inquiries--
  - Dennis is designated contact, I'm unable to comment
  - Describe only the most basic facts
- Remind other guides to instruct guests to refer the media to “media guide”
- Remind staff to ask trip participants to not let themselves be quoted
- NEVER assume a conversation is “off the record”
- Remind phone staff how to handle inquiries
  - Dennis is designated contact, I'm unable to comment
- Set up media monitoring, broadcasts and newspapers
3. Assemble PIRF (Public Incident Report Form)

- SCT Contact ___________________________ SCT Contact Phone ______________________

- What happened

- Where did it happen

- When did it happen

- Who was involved

- What has been done with the victims (affected parties)

VERIFY THESE FACTS WITH STAFF, OR AGENCY PERSONS WHO WERE ON SCENE

4. Making CONTACT

List all contact- fax, phone, in-person, on work sheets

High Priority
- Submit PIRF to Law Enforcement (Public Information Officer (PIO) and other agencies so they have something to work with when the media calls.
  - Request Media Protection.
  - Request Media inquiries to agencies be directed to designated SCT Contact
  - Request copies of any releases they prepare

- Contact permitting agency and fax PIRF

- Provide PIRF to Press requesting information

- Contact resort where trip originated, use PIRF

- List recipients of PIRF and all Media contacts on Media Contact Worksheet (Red file, Admin office, Risk Management)
• If appropriate, prepare a Press Release (see Guidelines for Dealing with the Media)
  • Factual.
  • Communicate care and compassion.
  • Do not use a statement that can be construed as an admission of negligence (Attorney review if necessary).
  • Send Press Release (or “PIRF”) via fax, email

Other priority
• Contact other river/area outfitters and fax PIRF
• Respond to other business contacts, inquiries, use PIRF
• List recipients of PIRF and all Media contacts on Media Contact Worksheet (Red file, Admin office, Risk Management)

5. FOLLOW UP

• Make follow up calls to Press Release/PIRF recipients. Use the media contact worksheet
• Respond to media inquiries and if necessary set times to follow up
• Assess potential promotional damage. Decide whether to take pro-active media outreach

NOTE

The guide who activates EMS can serve as on site spokesperson until a manager arrives . . .

  Provided:
  • They do not talk about the details of the incident!
  • They do not speculate!
  • They are boring!
  • Say “at this time I do not wish to be quoted. Please contact Dennis Oliphant at (541) 382-6277 or 800-770-2161, he has the best information on the incident and can help you with the information you need.”

The "Media Guide" is helpful to the media but should stick to as few facts as possible, should not speculate, should not try to promote the company or make excuses and should be as boring as possible (should not try to tell an interesting account of the incident)
### INTERNAL COMMUNICATIONS CONTACT LIST

<table>
<thead>
<tr>
<th>Time</th>
<th>Action</th>
<th>Task Owner</th>
<th>Contact #</th>
<th>Task Status and Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Inform staff:</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>• PIRF</td>
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<tr>
<td></td>
<td>• Remind staff that all contact is through media person only</td>
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<td></td>
<td>Inform Resorts, use PIRF:</td>
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<td>• SRR</td>
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<td>• ECR</td>
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<td>• BBR</td>
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<tr>
<td></td>
<td>Attorney</td>
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<tr>
<td></td>
<td>Insurance Representative</td>
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</tbody>
</table>

### MEDIA CONTACT LIST

<table>
<thead>
<tr>
<th>MEDIA</th>
<th>PRIORITY</th>
<th>SCT CONTACT</th>
<th>PHONE</th>
<th>FAX</th>
</tr>
</thead>
<tbody>
<tr>
<td>KTLV Channel</td>
<td>High</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bend Bulletin</td>
<td>High</td>
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</tr>
</tbody>
</table>
MEDIA CONTACT WORKSHEET

**Media Contact Worksheet**

**Media Contacts:**
- The Bulletin--
- KTVZ News, Bend--
- Bend/Fort Rock District of Deschutes National Forest--
- McKenzie District of Willamette National Forest--
- North Umpqua District of Umpqua National Forest--

1. Media Contact________________________________________________________________________
   Address______________________________________________________________________________
   Contact Name____________________________________________
   Phone__________________________

   Record of Conversation--"facts and information provided"
   ___________________________________________________________________________________
   ___________________________________________________________________________________
   ___________________________________________________________________________________
   ___________________________________________________________________________________
   ___________________________________________________________________________________

2. Media Contact________________________________________________________________________
   Address______________________________________________________________________________
   Contact Name________________________________________
   Phone______________________________
Record of Conversation--"facts and information provided"

_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________

J:\Administration\Risk Management\Emergency Resources\Media Response Plan\Media Contact Worksheet.doc
RESOURCES FOR RESPONDING TO AN EMERGENCY
Medical Contact Numbers and Location of Medical Help

Upper Deschutes River

- **Phone Locations:** Boat trucks, Photographer, Buses, Passers By
- **Medical Help:** 911 Activates Ambulance
  - **For Stitches:** Immediate Care Center, 1302 NE 3rd St, (541) 388-7799
  - **Hospital:** St. Charles Hospital, 2500 NE Neff Rd., (541) 382-4321. **Emergency Room** ext. 7100

Lower Deschutes River (There is currently no cell phone access in the canyon)

- **Phone Locations:** Oasis, Imperial Lodge, Maupin City Park, Photographers at Box Car and Oak Springs, BLM River Rangers, State Patrol, Passers By
- **Medical Help:** 911, or Maupin Local Fire/Ambulance (541) 395-2500
  - **For Stitches:** Local dentist Dr. Lee Ballantyne (541) 395-2636 (office), (541) 395-2594 (home).
  - **Hospitals:** Mid Columbia Medical Center, The Dalles, (541) 296-1111 (45 Miles from Maupin)
  - Mountain View Hospital, Madras, (541) 475-3882, or Bend St. Charles (see above, Upper Deschutes)

McKenzie River (Give location as McKenzie River Highway, not Highway 126)

**Phone Locations:** Belknap Hot Springs, mile marker 242 McKenzie River Highway, river left, 5 miles downstream of Ollalie turnoff), Ranger station – 7.9 miles down river from the Ollalie turn off, Jeanne B Harris wayside – 10.1 miles down river from Ollalie turnoff, Harbick’s market and gas station – 13.4 miles down river from the Ollalie turn off, Private residences/Businesses, and Passers By

**Medical Help:** 911 activates EAS at McKenzie Bridge and EMT's from Eugene/Springfield (50 miles)

**For Stitches,** McKenzie River Clinic (M-F, 9-5, Closed Noon hour), Blue River (541) 822-3341, 20 Miles Down from Ollalie, opposite the Forest Glen Boat Launch, and Bend Memorial Clinic, Sisters (M-F, 8:30-5), (541) 549-0303 (On Hwy 20, By bakery and drug store)

**Hospitals,** McKenzie Willamette Hospital, Springfield (47 Miles) (541) 726-4400 and Sacred Heart, Eugene (53 Miles) (541) 686-7300, and Bend St. Charles (directions and phone listed above, see Upper Deschutes)

North Umpqua River (No Cell Phone Access in the Canyon)

- **Phone Locations:** Along Highway 138, Diamond Lake Resort, Diamond Lake Ranger Station, off the highway at milepost 59 (i.e 59 miles upriver from Roseburg, several miles upriver from the put in), Dry Creek Store – 6 miles down river from Boulder Flat, Steamboat Inn at milepost
39, Idylyld, Glide, ODFW, BLM and Forest Service Personnel, Private Residences/Businesses and Passers By

- **Medical Help:** 911 activates EAS at Glide (milepost 19). Minimum response time is 30 minutes. Glide Fire Department (541) 496-0224

  **For Stitches:** Glide/Umpqua Community Health Center MAY be able to help, (541) 496-3504

  **Hospital:** Mercy Medical Center, Roseburg, (541) 673-0611 (20 Mi. from Glide; from I-5 take Exit 127)
Resources by River
Single page sheets included in the First Aid kit

Upper Deschutes River—Big Eddy Thriller

Any Emergency:  911  Tell 911 Patient is ONSHORE if they are ONSHORE
Bend office  (800) 770-2161  Dispatch  (541)610-2183
John Cramp  (cell) (541) 610-2181  (home) (541) 389-6230
Cate Bernard  (cell) (541) 610-2182  (home) (541) 390-4557
Dennis Oliphant  (cell) (541) 410-1126  (home) (541) 389-9100
Dave Sims  (cell) (541) 610-2182  (home) (541) 312-8302
Inter-agency Fire Dispatch  (541) 416-6800 (For Fires in BET or ADA areas)

Phone locations--Boat trucks Vans  Big Eddy Photographer  Bus drivers  Passers By

Evacuation points
Aspen, Big Eddy, Lava Island, and Forest Service fire road running from behind Big Eddy to Lava Island Falls

Location of Shore Based Equipment
Backboard onshore, river-left just below old stogie. Combination is the 6277, last 4 digits of SCT phone number

Qualified personnel--Fellow Guides

Medical Help:  911 Activates Ambulance
For Stitches:  Immediate Care Center, 1302 NE 3rd St, (541) 388-7799
Hospital:  St. Charles Hospital, 2500 NE Neff Rd., (541) 382-4321.  Emergency Room ext. 7100

Fatality
Ensure safety of other participants, do not move the body
Call 911 and secure the scene for law enforcement

Medical Emergencies
Call 911, response time may be lengthy
Tell 911 Patient is ON SHORE if PATIENT IS ON SHORE, otherwise boats/helicopters are dispatched

River Emergencies
Call 911, response time could be lengthy.

Fire
Call 911
Call Inter-agency Fire Dispatch  (541) 416-6800  
MOVE AWAY FROM FIRE--UPWIND. Fire can move quickly and jump roads and rivers. Notify others who may be affected AND Be prepared to cancel trip and evacuate.

**Vehicle**
Call 911

**Weather Emergencies** (lightning)
Be aware!
Reduce exposure and Evacuate and cancel trip if necessary

**FOR ANY EMERGENCY**
Call Bend office dispatch by radio or 800 770 2161
Fill out incident report completely and take witness statements  
Refer the Media to Bend Office--Dennis is designated media contact
We have sent for assistance, they will be here as soon as they can.
We are sorry for your injury--DO NOT admit guilt or wrong-doing

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Lower Deschutes River--All Day Adventure

Any emergency   911    Maupin Local Fire and Ambulance (541) 395-2500
Bend office    800-770-2161    Dispatch (541) 610-2183
John Cramp      (cell) (541) 610-2181    (home) (541) 389-6230
Cate Bernard    (cell) (541) 610-2182    (home) (541) 390-4557
Dennis Oliphant (cell) (541) 410-1126    (home) (541) 389-9100
Dave Sims       (cell) (541) 610-2182    (home) (541) 312-8302

Note: If Maupin ambulance is busy, transport will come from Dufor or The Dalles, lengthening response time. (Don't use ambulance to baby sit guests during trip). Ambulance can transport to The Dalles or Madras.

Phone locations (There is currently no cell phone access in the canyon)
Oasis, Imperial Lodge, Maupin City Park, BLM and State Patrol, River Photographers. And Passers By

Evacuation points--Lower river access road.

Location of Shore Based Equipment--Unavailable

Qualified personnel--Fellow Guides. Other river companies’ personnel, BLM personnel and passers by

Medical Help: 911, or Maupin Local Fire/Ambulance (541) 395-2500
For Stitches: Local dentist Dr. Lee Balentine (541) 395-2636 (office), (541) 395-2594 (home).
Hospitals: Mid Columbia Medical Center, The Dalles, (541) 296-1111 (45 Miles from Maupin)
           Mountain View Hospital, Madras, (541) 475-3882, or Bend St. Charles (see above, Upper Deschutes)

Fatality
Ensure safety of other participants, do not move the body
Call 911 and secure the scene for law enforcement

Medical Emergencies
Call 911, response time may be lengthy
Tell 911 Patient is ON SHORE if PATIENT IS ON SHORE, otherwise boats/helicopters are dispatched
River Emergencies
Call 911, response time could be lengthy.

Fire
Call 911
Call Inter-agency Fire Dispatch (541) 416-6800
MOVE AWAY FROM FIRE--UPWIND. Fire can move quickly and jump roads and rivers.
Notify others who may be affected AND Be prepared to cancel trip and evacuate.
Vehicle
Call 911

Weather Emergencies (lightning)
Be aware!
Reduce exposure and Evacuate and cancel trip if necessary

FOR ANY EMERGENCY
Call Bend office dispatch by cell (541) 610 2183 or 800 770 2161
Fill out incident report completely and take witness statements
Refer the Media to Bend Office--Dennis is designated media contact
We have sent for assistance, they will be here as soon as they can.
We are sorry for your injury--DO NOT admit guilt or wrong-doing

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Emergency Resources.doc
McKenzie River

Any emergency 911  Bend office 800-770-2161  Dispatch (541) 610-2183

John Cramp  (cell) (541) 610-2181  (home) (541) 389-6230
Cate Bernard  (cell) (541) 610-2182  (home) (541) 390-4557
Dennis Oliphant  (cell) (541) 410-1126  (home) (541) 389-9100
Dave Sims  (cell) (541) 610-2182  (home) (541) 312-8302
McKenzie Ranger District Office (541) 822-3381

Phone locations--Give your location as McKenzie River Highway, not Highway 126
Belknap Hot Springs, mile marker 242 McKenzie River Hwy, 5 miles downstream of Ollalie, Ranger
station – 7.9 miles down river from Ollalie, Jeanne B Harris wayside – 10.1 miles down river from
Ollalie, Harbick’s market and gas station – 13.4 miles down river from the Ollalie turn off, Private
Residences/Business, Passers By

Evacuation points--McKenzie River Highway runs the length of the river.

Location of Shore Based Equipment--Unavailable

Qualified personnel--Fellow Guides, Forest Service Personnel, Other river companies’ personnel and
passers by

Medical Help: 911 activates EAS at McKenzie Bridge and EMT’s from Eugene/Springfield (50 miles)
For Stitches, McKenzie River Clinic (M-F, 9-5, Closed Noon hour), Blue River (541) 822-3341, 20
Miles Down from Ollalie, opposite the Forest Glen Boat Launch, and Bend Memorial Clinic, Sisters (M-
F, 8-30-5), (541) 549-0303 (On Hwy 20, By bakery and drug store)
Hospitals, McKenzie Willamette Hospital, Springfield (47 Miles) (541) 726-4400 and Sacred Heart,
Eugene (53 Miles) (541) 686-7300, and Bend St. Charles (directions and phone listed above, see Upper
Deschutes

Fatality
Ensure safety of other participants, do not move the body
Call 911 and secure the scene for law enforcement

Medical Emergencies
Call 911, response time may be lengthy
Tell 911 Patient is ON SHORE if PATIENT IS ON SHORE, otherwise boats/helicopters are dispatched

River Emergencies
Call 911, response time could be lengthy.

Fire
Call 911
Call Inter-agency Fire Dispatch (541) 416-6800
MOVE AWAY FROM FIRE--UPWIND. Fire can move quickly and jump roads and rivers. Notify others who may be affected AND Be prepared to cancel trip and evacuate.

Vehicle
Call 911
WeatherEmergencies (lightning)
Be aware!
Reduce exposure and Evacuate and cancel trip if necessary

FOR ANY EMERGENCY
Call Bend office dispatch by cell or 800 770 2161
Fill out incident report completely and take witness statements
Refer the Media to Bend Office--Dennis is designated media contact
We have sent for assistance, they will be here as soon as they can.
We are sorry for your injury--DO NOT admit guilt or wrong-doing

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EMERGENCY ACTION PLAN

North Umpqua River

Any emergency 911  Bend office 800-770-2161  Dispatch (541) 610-2183
John Cramp (cell) (541) 610-2181 (home) (541) 389-6230
Cate Bernard (cell) (541) 610-2182 (home) (541) 390-4557
Dennis Oliphant (cell) (541) 410-1126 (home) (541) 389-9100
Dave Sims (cell) (541) 610-2182 (home) (541) 312-8302
N. Umpqua Ranger District Office (541) 496-3532

Phone locations--Currently no cell phone access in Canyon
Along Highway 138: Diamond Lake Resort, Diamond Lake Ranger Station, Milepost 59 (59 from Roseburg, several miles up from put in), Dry Creek Store – 6 miles down river from Boulder Flat, Steamboat Inn at milepost 39, Idyllyld, Glide, Residences/Business, Passers By, ODFW, BLM and Forest Service Personnel

Evacuation points--Highway 138 runs the length of the river.

Location of Shore Based Equipment--Unavailable

Qualified personnel--Fellow Guides, Forest Service/BLM Personnel, Other river companies and passers by

Medical Help: 911 activates EAS at Glide (milepost 19). Minimum response time is 30 minutes.
Glide Fire Department (541) 496-0224
For Stitches: Glide/Umpqua Community Health Center MAY be able to help, (541) 496-3504
Hospital: Mercy Medical Center, Roseburg, (541) 673-0611 (20 Mi. from Glide; from I-5 take Exit 127)

Fatality
Ensure safety of other participants, do not move the body
Call 911 and secure the scene for law enforcement

Medical Emergencies
Call 911, response time may be lengthy
Tell 911 Patient is ON SHORE if PATIENT IS ON SHORE, otherwise boats/helicopters are dispatched

River Emergencies
Call 911, response time could be lengthy.

Fire
Call 911
Call Inter-agency Fire Dispatch (541) 416-6800
MOVE AWAY FROM FIRE--UPWIND. Fire can move quickly and jump roads and rivers.
Notify others who may be affected AND Be prepared to cancel trip and evacuate.

Vehicle
Call 911

Weather Emergencies (lightning)
Be aware!
Reduce exposure and Evacuate and cancel trip if necessary

FOR ANY EMERGENCY
Call Bend office dispatch by cell or 800 770 2161
Fill out incident report completely and take witness statements
Refer the Media to Bend Office--Dennis is designated media contact
We have sent for assistance, they will be here as soon as they can.
We are sorry for your injury--DO NOT admit guilt or wrong-doing

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Other Resources

- **The following sections require completion**
- **Sheriff responsible for search and rescue in each area used.** While it would be ideal to meet the sheriff and the key people likely to be managing a search and rescue this may not always be possible. You can at least send a copy of your Press Kit and Emergency Action Plan, invite their comments, and call to follow-up. In the follow-up call find out what kind of Resources they have available e.g. search dogs, trackers, fixed wing and helicopter units, etc. This lets them know you are a professional organization.

  Upper Deschutes – Deschutes County Sheriff  
  Les Stiles, Sheriff  
  Search and Rescue  541-388-6502

  Lower Deschutes – Wasco County Sheriff's Office - South County  
  541-395-2214

  North Umpqua – Douglas County Sheriff  
  Chris Brown, Sheriff  
  541-440-4450

  McKenzie – Lane County Sheriff  
  John Miller - Search and Rescue Coordinator  
  541-682-8544

- **Land managers of each area used by your organization.** Again, if you can’t meet them in person at least send them information and give a follow-up call.

  - Upper Deschutes – Forest Service – Bend / Fort Rock Ranger District  
    Rick Wessler  
    (541) 383-4000

  - Lower Deschutes – Bureau of Land Management – Prineville District Office  
    Dale Johnson  
    (541) 416-6700

  - McKenzie River – Forest Service – McKenzie Ranger District  
    Kathy Keable  
    (541) 822-3381

  - North Umpua – Forest Service – North Umpqua Ranger Distric  
    Jerry Harriman or Dana Croll
• **The Critical Incident Stress Foundation.**
  This organization has trained debriefing teams all over the country and can be reached at 410 750 9600. They can provide an invaluable service to those affected by the stress of the accident.

• **Medical advisers.**
  Specialist physicians may be useful in on-site treatment of some conditions e.g. snakebite, altitude illness or in providing advice on follow-up care.

  [need to insert name, resources available and contact #’s]

• **Your insurance representative.**
  The Insurance Mart
  Chris Walston
  (541) 475-2249

• **Legal advisers.**
  It is important to get legal advice that represents the long-term interests of your organization not just your insurance company.
  Terrence O’Sullivan
  1070 NW Bond Suite 303
  Bend, OR 97701 - 2047
  (541) 389-1770

• **Public relations professionals.**
  People who specialize in crisis management would be particularly appropriate.

  [need to insert name, resources available and contact #’s]

• **External Investigator**
  Through AO.

  [need to insert name, resources available and contact #’s]
APPENDICES

Incident Command System
The Incident Command System uses a team that performs five management functions:

1. Command
2. Planning
3. Operations
4. Logistics
5. Finance

Early in an incident these functions may be combined under one person, the Incident Commander, however different Section Heads may be added for any or all of the five functions as the scope of an Incident expands. When multiple agencies are involved representatives from each agency will be part of the Command Team so the Incident Commander can use their knowledge and capabilities as a Resource.

Ideally a senior person from your organization would be part of the Command Team to represent your interests, contribute Resources, and stay abreast of developments. This is more likely to happen if you use an Incident Command System approach internally as it makes it easier to transfer control of the operation to appropriate authorities in a way they will view as professional.
Preplanned Scenario

**Missing person or group, with or without staff supervision.**

**Response**
- Assess safety of available search staff
- Gather all pertinent data to assist search
- Determine urgency
- Notify SCT
- Determine Point Last Seen and Direction of Travel
- Confine the search area
- Conduct hasty search with immediately available staff
- Notify agency with jurisdiction for Search and Rescue
- Add appropriate search resources
- Execute internal and external communication plan
- Prepare for incident demobilization
Guidelines and Suggestions for Dealing with Next of Kin

Responding to Next-of-Kin

This is an immediate task and the owner is generally the best person to make this notification. If he is not available the General Manager will make the calls.

[ In some situations it may be desirable for someone outside SCT to make the initial call but try and avoid having a sheriff or search and rescue person call.]

This entire section contains valuable guidance, and should be read prior to placing any calls.

After immediate notification, the owner will designate one person to take primary responsibility for ongoing relations with the family, a task that might continue for many months. This family relations coordinator might be a different person than the initial spokesperson.

Each incident will have seemingly unique circumstances, but the following are some general guidelines and suggestions:

1. Sensitivity to the feelings of the family is the foremost consideration. Think through what you will say before you make contact. Have your facts organized and accurate, and be sure to convey whatever personal condolences might be appropriate, without seeming to admit liability. Try to anticipate possible responses and prepare yourself accordingly.

2. Remember that the next-of-kin have a right to all factual information pertaining to a serious accident, but as the initial notification will be received with surprise and shock don't expect to convey all the details until a follow-up call. Make certain they know how to reach you at any time they wish to speak.

3. Promptness is important. Delays will almost certainly lead to suspicions or other bad feelings. Don’t delay calling if all the details are not yet known. Once the sheriff or search and rescue radios are talking about a fatality the news media are not far behind.

4. Be conscious of the timing of your call and try to think through where the recipient might be; at work, home, vacation, etc. Consider the value of speaking to all next-of-kin listed as emergency contacts at the same time, perhaps through a conference call. Also think through what to do if you have difficulty contacting next-of-kin, if another family member answers the phone, etc.

5. Conclude the call by asking what support the next-of-kin need immediately form relatives, neighbors, friends, etc. and help procure it if appropriate.

6. Ensure the Next of Kin know how to reach you ---at any time
7. Invite family representatives to come to the accident site at your expense if they wish. Offer to make all travel and hotel arrangements for the next-of-kin.

8. Consider having a staff member who has firsthand knowledge of the accident make a follow-up call, coached by a legal counsel.

9. Consider having a representative of your organization visit the family at their home.

10. Arrange for others (Board Chair, other staff who know the family, etc.) to reinforce your communication. Coordinate with the designated family relations coordinator to avoid redundant or conflicting messages being given.
Guidelines for Handling the Media

Responding to the Media

One designated spokesperson should be the only person responsible for communicating with the news media. This should be a senior executive who is comfortable in front of the media but might not be the most senior executive. This allows the spokesman to defer questions they might not be ready to answer to a later statement by the senior executive. Other people in the organization must be aware of the single spokesperson policy and refer all inquiries to this person.

Media may include:

1. Print media, primarily local and national newspapers.
2. Radio and TV stations, primarily local.

Priority

The priority for contacting different media groups depends on their potential interest in the incident and their past relationship with the School.

1. **High** Priority – Those who will definitely want to cover the story and those who have a positive relationship with the SCT from previous media contacts.
2. **Lower** Priority – Those who may cover the story but will learn of it from a wire service or other media.

Timing of Contacting Media

It is usually advisable to notify the media just before the situation will become visible through the involvement of law enforcement or search and rescue authorities. The media can easily learn of an emergency situation, and it is preferable that your organization releases information rather than appearing defensive.

Goal of Communication with Media

The objective is to have a one-day story, avoiding a continuing series of headlines and features dragged out over a period of days or weeks. To this end, provide the news media with as much detail as possible, within the constraints detailed below. Make sure that new information is relayed promptly to the media to allow them to conclude coverage of the incident.
Methods of Communication

Prepare and fax a press release to high priority media. Use a summary structure: open the statement with key facts (who, what, when, where, why), and then add more details. Write the release the way you would like to have it appear in print media so the reporter has little editing to do. \textbf{SCT has prepared a representative example.}

After faxing out the initial press release consider calling media representatives you hope will be sympathetic. Rather than reading a "canned story", the spokesperson should have a written list of key points for reference, and tell the story in their own words. The image projected by the spokesperson of concern and caring may have an important effect on the eventual tone of the story that appears.

Try to avoid press conferences until you are ready with a full factual statement you know is correct.

Restrictions on Dealing with the Media

No one, including the Executive Director or Incident Commander will release any information that identifies responsibility for an accident without consulting legal counsel.

Specific problems arise when:

- Assessment of fault or criticism of conduct, school policy, or equipment is made public without a full explanation of the circumstances of the accident, developed through the complete SCT Internal and External investigation process.

- Medical information is released prior to diagnosis by a licensed physician regarding the nature of injury or illness.

- Names of victims are revealed prior to notification of Next of Kin.

- Estimates of property damage are released.

Engaging with the Media

Any particular incident will have its own characteristics so these guidelines are an aid, rather than a substitute, for thoughtful response during the incident.

The overarching communication goals are to show that the organization

1. Cares deeply about the tragedy.
2. Plans an independent investigation to establish the causes and learn how to prevent future incidents.
3. Is engaged in work of social value that many people regard highly despite the tragedy.
WHAT THE MEDIA WILL WANT TO KNOW

- What happened?

- Where did it happen?

- When did it happen?

- Who many people were involved?

- Who was involved? Ages- and hometowns or states can be given prior to notification of relatives and subsequent release of names. Identify rescuers as well as staff and students.

- Have their relatives been notified?

- What emergency response efforts have been made to date? What additional emergency response efforts are planned?

- Information on conditions in the field, equipment, training, and safety of the group.

- Background on SCT, including the safety training of students.

- Provide accurate and appropriate disclosure of the facts and cooperate to every extent possible with the news media.

- Explain why certain information cannot be released, e.g. Next of Kin have not yet been notified, doctor’s orders prevent interview of survivor, etc. Withholding the name of a victim pending notification of Next of Kin is appropriate and will be respected by the media. However, do not deny that the accident itself occurred.

- Do not speculate. When the answer to a query is not known, say so. Also, avoid responding with “no comment”, which can imply either a lack of cooperation or that we have something to hide.

- It is important to impress upon the media any kind of humanitarian, thoughtful acts taken by SCT e.g. Chairperson flies to the scene, President visits family, etc.

- When questions come in from the media before a statement is ready, then let them know when and how information will be made available. Control the information flow as opposed to just responding. Prompt, accurate follow up is essential.

- Keep statements as brief and simple. Avoid over-explaining. Beware of the sound bites that may
be extracted for use from long statements.

- Communicate care and compassion.
- Do not give out information on matters under current litigation.
- Do not speculate or admit liability.
- It is desirable to let the media know of the independent External Review being conducted and that can be made available to them.
- It is acceptable to say that we have improved our safety policy as we have found the need and learned from experience.
- If included, background material about SCT, including a history, philosophy, and safety statement, are appropriate.

- Arrange for monitoring of news reporting. Listen to broadcasts and check newspapers.
- When a reporter prints or broadcasts erroneous information, inform the reporter, not his or her superior, and provide correct information as soon as possible.
- Keep the Executive Director informed of media reporting, and of any situations that might involve reflect adversely upon SCT.
- Provide accurate and appropriate disclosure of the facts and cooperate equally to every extent possible with the news media.
- Periodically remind staff and trustees to refer all inquiries to the spokesperson.
- Do not allow outsiders, or the media, to overhear discussions about the emergency situation.
Checklist for Internal Accident Investigation

Name, Time and Date of Trip
Time of Incident

Names of Trip leader and guide crew
Trip leader qualifications
Guide whose guest was injured
Qualifications

Injured Guest’s Name, age and gender
Full Mailing Address, Phone #’s and email
Social Security Number
Have Insurance? Yes  No

Was EMS called?
First Aid Performed By
Injured guest complained of
What Care Was Given?
Relevant past medical history if available

Final medical doctor conclusion and diagnosis
What treatments were necessary?

Describe location and accident site
Weather
Air Temp
Water Temp
Any Unusual Conditions
Any Other Contributing Factors

What Happened, who did it happen to and who was involved? NOTE THE AVAILABILITY OF AN AO RESOURCE ON INFORMATION GATHERING AND INCIDENT INTERVIEW TECHNIQUE ON THE AO CD. [Self Assessment Support Materials\A5A Wilderness Incident Investigative Interview]

What were the events leading up to the accident including the actions of guides and passengers
Events of Accident in Injured’s own words
Events of accident in Guide’s own words
Events of accident in Trip Leader’s own words
Events of accident according to witnesses (other staff, guests, public)
What were the actions following the accident?
Were sufficient warnings, instructions, and information provided
Were Warnings or Instructions NOT Heeded

Did the Injured Contribute to the Accident?
Did the Injured State any Contribution to the Accident
Did Another person Contribute to the Accident?

Were Photos Taken: Yes No

In what ways can this type of accident could be avoided in the future?
Is this one off, or does review of incidents reveal a pattern of increased risk
How can the risk be mitigated?
  • List of remedial actions, with completion dates
  • Training – specific individuals/ department manuals
  • Procedures
  • Has everyone been informed who needs to know

Re-analyze and update Risk Management Manual and Emergency Response Plan

Communicate information on the accident, investigations and trends to all staff, and table it at management meetings.

What else needs to be improved?
  Did the internal systems work adequately, and was the accident, response and follow up well managed?
  Was all reporting and paperwork timely and complete?