

From: [Denley Loge](#)
To: [Fox, Susan](#)
Subject: [EXTERNAL] amendments
Date: Wednesday, September 23, 2020 9:04:33 AM

I support amendment joint rule 30-70 but not before the election. This is poor timing and should be talked about for our next session.

30--90 do not favor

60--05 against because this could backfire on public sentiment toward legislators and republicans

60-10 60-40 50-05 10-180 Need more details please

Thanks, Rep. Loge

--

Representative Denley M. Loge
House District 14
St. Regis, Mt.

Legislators are publicly elected officials. Legislators emails sent or received involving legislative business may be subject to the right to know provisions of the Montana constitution and may be considered a "public record" pursuant to Montana law. As such, emails sent or received, it's sender or receiver, and the emails contents may be subject to public disclosure except as otherwise provided by Montana law.

From: [Fred Anderson](#)
To: [Fox, Susan](#)
Subject: [EXTERNAL] proposed rules changes
Date: Wednesday, September 23, 2020 9:38:44 AM

Dear Executive Director Fox:

I have reviewed the proposed rules changes and feel that while there is merit in some of the proposed changes, the timing is ill advised. The proposed changes excepting those focused on the emergency declaration would be more appropriately addressed during a legislative session.

Fred Anderson

From: [Russ Tempel](#)
To: [Fox, Susan](#)
Subject: [EXTERNAL] Re: Joint Rules Committee proposals
Date: Tuesday, September 22, 2020 8:59:13 PM

Susan, I can not support any of these suggested rule changes. This is something that should be done though the legislature. Sen. Russ Tempel

Sent from my iPhone

On Sep 21, 2020, at 7:50 AM, Fox, Susan <sfox@mt.gov> wrote:

Dear Senators,

Please find attached four proposed rule amendments along with a cover memo. These documents have been mailed to you as well.

Susan Fox

<JTPoll1exofficiomembership.agendaitem1.FINAL.pdf>
<JTPoll2masonsandamendmentbypoll.agendaitems2and4.FINALpdf.pdf>
<JTPoll4proclamation.agendaitem5.FINAL.pdf>
<JTPoll3remotemailout.agendaitem3.FINAL.pdf>
<DirectorFoxMemo.pdf>

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From: geraldine.custer@mtleg.gov
To: [Fox, Susan](#)
Subject: [EXTERNAL] Rules Comments
Date: Wednesday, September 23, 2020 10:43:25 AM

Dear Susan

First I do not see the need to rush on the rules, as we operate fine doing the rules like we have in the past. I do not see how we can do rules that bind another legislature, as some of the folks on the committee won't be in the next legislature. How are we going to vote or amend these rules remotely? Should current legislators be voting or the legislators elected Nov 3?

I could support a rule about voting remotely but it needs fleshed out as to when it would be allowed and it should be narrow. Voting remotely should have some security with a pin or something the tech folks could use to assure the legislator is voting unless it is going to be zoom with video and one can see the lips moving on a voice vote that is recorded with video.

I see value for rule 30-70 in regular session as it would apply to breaking a tie about Administrative Rules, but I do not see it applying in an emergency so not in favor right now.

I see 30-90 as making it political so not in favor it should be in favor of employee if a tie and maybe that needs added for tie breaker in the current rule for the next session not right now.

I hate 60-05 it makes us appear above the law and I seriously don't think it would stand up in court. The Administrative rules are below Constitution, Case Law, and Statute, so why would our rules and procedure be any different. Not in favor.

Rule 60-10 needs tons of work on how. Not in favor in current form.

Rule 60-40 not in favor without getting polling fleshed out so there is discussion that is noticed and a way the public can weigh in.

Rule 50-05 not in favor of proclamation without having discussion could cause lots of negative publicity.

Rule 10-180 needs work and narrowing down to have folks present if at all possible unless a health issue is too risky. Constituents voted to be represented and have their voices heard with public participation. Could support with sideboards.

Thank you for letting me comment and for all you do to keep us informed and out of trouble!

Happy Fall,

Geraldine Custer

From: [Tom Welch](#)
To: [Fox, Susan](#)
Cc: [Tom Welch](#)
Subject: [EXTERNAL] Rules Committee proposals
Date: Wednesday, September 23, 2020 1:22:07 PM

Thoughts on the proposed rules under consideration:

I feel it is good to look at such matters and I do realize that there are perhaps some changes/updates needed. Having said that, following are my general thoughts at this time:

Amend Joint Rule (JR) 30-70

Has nothing to do with current emergency and with Interim ending, should be handled as part of upcoming Session

Appears to conflict with current Statute(s)

Add JR 30-90

See above comments

Amend JR 60-05

Question relevance to current emergency

Change may seem to imply that Legislature holds itself above the Law

Amend JR 60-10

Who requests and process involved—much better side boards needed

How are amendments handled—process could linger for prolonged period of time

Interim ending shortly – best handled in 2021 Session process

Insert JR 10-180

Is intent that this only applies in a declared emergency or at all times?

No sideboards reflected---way too general

Insert 50-05

Why needed

No sideboards as to topics, how many etc.

List of parties who are allowed to propose a Proclamation may be too limited

No relationship to current emergency

General questions/thoughts—

--Can we 'poll' before the rules are approved to allow for 'polling'?

--Many of these proposals have little or no relevance to the current emergency so best be addressed as part of the upcoming regular Session

Thanks for your efforts and the opportunity to provide some general feedback!

Rep Tom Welch

MT HD 72

Sent from [Mail \[go.microsoft.com\]](mailto:Mail[go.microsoft.com]) for Windows 10

From: [John Fuller](#)
To: [Fox, Susan](#)
Subject: [EXTERNAL] Amendments to the Joint Rules
Date: Tuesday, September 22, 2020 12:07:09 PM

Dear Ms. Fox,

Please disregard my earlier email.. I misunderstood what was being requested. Since only comments were being requested, not votes, please delete my earlier email. As for comments for the committee, I support the proposals and am looking forward to the collective wisdom of the committee being announced.

I apologize for my misunderstanding, and the subsequent waste of your time.

Sincerely,
John Fuller
House District 8

Sent from [Mail \[go.microsoft.com\]](mailto:go.microsoft.com) for Windows 10

From: [Keith Regier](#)
To: [Fox, Susan](#)
Subject: [EXTERNAL] rules
Date: Monday, September 21, 2020 9:05:08 PM

Joint Rules Committee,
I agree with all four rule proposals.
Thanks,
Keith Regier, SD#3

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From: [Fox, Susan](#)
To: ["Sen. Scott Sales"](#); ["Sen. Mark Blasdel"](#); ["Rep. Casey Schreiner"](#); ["schreinerforlegislature@gmail.com"](#); ["Rep. Seth Berglee"](#); ["Rep. Shane Morigeau"](#); ["Shane Morigeau"](#); ["Fred Thomas"](#); ["Fred Thomas"](#); ["Sen. Jon Sesso"](#); [JP Pomnichowski](#); ["Abbott Kim"](#); ["Greg Hertz"](#); ["Rep. Greg Hertz"](#); ["Rep. Kim Abbott"](#); ["Margie MacDonald@mtleg.gov"](#); ["macmargaret@gmail.com"](#); [Rep. Wylie Galt](#); ["wyliegalt@gmail.com"](#); ["Derek.Skees@mtleg.gov"](#)
Cc: [Everts, Todd](#); [Coles, Jaret](#); [Burkhardt, Julianne](#); [Johnson, Julie](#); [Spencer, Nadine](#)
Subject: FW: Dunwell Legislative Complaint re Joint Rules mtg
Date: Friday, September 18, 2020 1:04:00 PM
Attachments: [Dunwell_LeqComplaint_9-17-20.pdf](#)

Dear Legislative Council,

I received this email and attachment from Rep. Dunwell. As we do not have a formal complaint process, I spoke with Rep. Dunwell and asked her how to handle this. She asked me to send this to you and to enter it as an exhibit for the upcoming 9/24 Joint Rules Committee meeting.

Thank you, Susan

Susan Byorth Fox
Exec Dir, Legislative Services
(406) 444-3066
sfox@mt.gov

From: Dunwell Mary <maryann.dunwell@mtleg.gov>
Sent: Thursday, September 17, 2020 2:29 PM
To: Fox, Susan <sfox@mt.gov>; Everts, Todd <teverts@mt.gov>; Coles, Jaret <JColes@mt.gov>
Cc: Abbott Kim <kim.abbott@mtleg.gov>; Schreiner Casey <casey.schreiner@mtleg.gov>; Dunwell Mary <maryann.dunwell@mtleg.gov>
Subject: [EXTERNAL] Dunwell Legislative Complaint re Joint Rules mtg

To: Susan Fox, Montana Legislative Services Administrator
Todd Everts, Montana Legislative Chief Legal Counsel
Jaret Coles, Montana Legislative Services Attorney

As a member of the Montana State Legislature, I would like to file an official complaint regarding what I believe was an illegally held convening of the Joint Rules Committee of the 66th Legislative Session, 2019, by Republican members of this obsolete committee. The meeting took place on Thursday, September 17, 2020, at 11 a.m.

I use terms like illegal and obsolete because the Joint Rules Committee is exclusively a session committee, not interim or administrative committee. Session committees can't meet after legislative session concludes. What's more, these Republican



Big Sky Country
MONTANA HOUSE OF REPRESENTATIVES

Representative Mary Ann Dunwell
House District 84

DURING THE SESSION
State Capitol Building
PO Box 200400
Helena MT 59620-0400
Phone: (406) 444-4800
leg.mt.gov

COMMITTEES
Legislative Administration, Vice Chair
Human Services
Taxation

HOME ADDRESS
PO Box 4656
Helena MT 59604
Phone: (406) 461-5358
maryann.dunwell@mtleg.gov

To: Susan Fox, Montana Legislative Services Administrator

Todd Everts, Montana Legislative Chief Legal Counsel

Jaret Coles, Montana Legislative Services Attorney

As a member of the Montana State Legislature, I would like to file an official complaint regarding what I believe was an illegally held convening of the Joint Rules Committee of the 66th Legislative Session, 2019, by Republican members of this obsolete committee. The meeting took place on Thursday, September 17, 2020 at 11 a.m.

I use terms like illegal and obsolete because the Joint Rules Committee is exclusively a session committee, not interim or administrative committee. Session committees can't meet after legislative session concludes. What's more, these Republican legislators who convened were obviously refusing to wear masks, thus violating state emergency mandate. It's ironic that they're rule makers, yet breaking the rules. In addition, they apparently required a legislative attorney to sit just arms-length away, if that, to the committee chair who was continuously speaking and not wearing a mask. I believe this endangered the staff attorney, who had no choice but to do what's required.

This meeting was outrageous political posturing, pure and simple, and a misuse of public airwaves, staff time, and an abuse of Majority leadership power. In an apparent sneaky manipulative move on the part of these Republicans, they evidently waited until Chief Legal Counsel Todd Everts was away for a wedding to pull this political stunt.

I'd like to refer to a public email of Sept. 11, 2020, written by the chief counsel to some Republican legislators advising against this morning's proceedings, that legislators do not have authority to pass joint resolutions via polling during the interim, and the legislature must be convened in legislative session to adopt joint resolutions or bills.

Democrats boycotted this illegal meeting of Sept. 17, which was the right thing to do.

Thank you for your consideration of this official complaint.

Regards,

Rep. Mary Ann Dunwell

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Democrats boycotted this illegal meeting of Sept. 17, which was the right thing to do.

Thank you for your consideration of this official complaint. Please see attached for signed copy on letterhead.

Regards,
Rep. Mary Ann Dunwell

Mary Ann Dunwell

House District 84, Helena/East Helena

State of Montana

maryann.dunwell@mtleg.gov

(406) 461-5358 cell/text

<https://www.facebook.com/maryannandunwellforhd84> [facebook.com]

@MTMaryAnn

PO Box 4656

Helena, MT 59604

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From: webmaster@localhost.legmt.gov
To: [Fox, Susan](#)
Subject: Public Comment Submission for Leg Council
Date: Saturday, September 19, 2020 9:17:23 AM

Comments for the Legislative Council

Date: 19th September 2020 09:17

Full Name:

Representative Frank Fleming

Email Address:

fleminglor5@gmail.com

Subject Line:

Proposed rule amendments

Your Comment:

I am in support of the four proposed rule amendments.

Sent via leg.mt.gov/committees/admincom/lc/meeting-info/

From: webmaster@localhost.legmt.gov
To: [Fox, Susan](#)
Subject: Public Comment Submission for Leg Council
Date: Friday, September 18, 2020 4:32:29 PM

Comments for the Legislative Council

Date: 18th September 2020 16:32

Full Name:

Sue Vinton

Email Address:

sue.vinton@mtleg.gov

Subject Line:

Agenda item #3: Amendment (Thomas) to Joint Rule 10-180

Your Comment:

Dear Committee Members: I represent House District 56 and will be starting my 3rd term in the upcoming Legislature. I believe that Legislators already have the ability to vote absentee via proxy in Committee meetings and on 2nd reading in the House. It is my opinion that Legislators must be physically present to vote on 3rd reading. After listening to the presentation to this Committee by Ms. Fox, and with my own experience with technology throughout this Interim, I do not believe that voting electronically is 100% secure. Again, I believe that all 3rd reading votes should be "present and voting". Thank you.

Sent via leg.mt.gov/committees/admincom/lc/meeting-info/

Comments on Proposed Rule Amendments

General Comments:

The Joint Rules (SJ1), passed in the 2019 Legislative session, are still in effect. My understanding is that our Code Commissioner has indicated that modification of these rules linked to challenges of safe successful governance under the Covid 19 emergency would be allowed under the provisions for continuation of governance of the legislature. He has also indicated that rule proposed changes beyond this could result in a successful court challenge. As such, my intention is twofold. 1) Respond with my thoughts on the rule change generally, and 2) to speak to the nexus of the emergency linkage.

JTR POLL 01.AJC

1. Amend Joint Rule 30-70. Appointment of interim committees.

This proposal would strengthen legislative oversight of agency rule making and thus would help balance power between the executive and the legislature.

- a) I support this concept and I have requested a bill draft to do so in statute. However, this has no linkage I can see to governance under this emergency.

2. Insert new Joint Rule 30-90. Administrative committees.

This proposal seeks to de-politicize personnel actions regarding our bipartisan legislative staff. The genesis is the challenges of rehiring the Legislative Auditor. I support this concept, but not this method. As drafted our non-partisan hiring would become partisan. A poor choice for a non-partisan legislative staff. Moreover, the Auditor, the Lead Fiscal Analysis, and the Legislative Service Lead would be subject to undue influence of the majority, again a problem in a non-partisan staff scenario,

- a. A better solution might be to stipulate that a tie vote yields a favorable action for the employee in question in a rehire situation. This would have resolved the Auditor rehire challenge, and not risk enhanced partisan challenges elsewhere.
- b. As drafted, I am opposed. This also has no linkage to the Covid 19 emergency and is not necessary now.

Comments on Proposed Rule Amendments

JTR POLL 02.AJC

1. Amend Joint Rule 60-05. Source and precedent of legislative rules . . .

The 2017 legislature made a rule that asserts that legislative rules take precedence over “statutory provisions.” This change would drop statutes to the lowest level in the order of precedence. It has been asserted that the precedence structure in the joint rules would then be parallel to that in *Mason’s Manual of Legislative Procedure*.

- a) I have never been supportive of the concept that the legislature is above the very laws or statutes they pass. This is a continuation of a current thought being pushed that the legislature can ignore the law and do as it wishes via rule, Masons, and now parliamentary procedure. If a legislature does not like a statute impacting operation, propose a change to the statute in the light of day and change it. I oppose. And this has nothing to do with the Covid 19 emergency.

2. Amend Joint Rule 60-10. Suspension of joint rule – change in rules.

This proposal would allow rule changes to be made by polling the legislature rather than by the deliberate process of passing a joint resolution.

This polling process lacks definition. One would expect it to be substantially more rigorous than those already in place, given the fact that it would be used in place of the process used to pass a bill. This moves the legislature away from transparency, not toward it. Potentially, with strict sideboards linked to an emergency, there could be some merit.

- a) As drafted, I oppose.

3. Amend Joint Rule 60-40. Tenure of Joint Rules

This proposal reinforces the change proposed for Joint Rule 60-10.

Oppose for reasons stated above.

Comments on Proposed Rule Amendments

JTR POLL 03.AJC

1. Insert new Joint Rule 10-180. Members present physically or by electronic means.

This proposal would facilitate a “hybrid” session.

Concern: Effective legislating requires personal interaction among legislators and the public. This proposal, as written, is too broad. This needs sideboard, such as it can only be used during an emergency that risks legislator safety or when a legislator is subject to serious health risks.

- a) This is linked to the emergency and does need to be flushed out appropriately given the current situation. I support this concept with sideboards.

JTR POLL 04.AJJ

1. Insert new Chapter 50. “Proclamations”
 - a. Montana does not need this. Leadership can always get to a microphone, and there is already a huge amount of political speak filling the media. There is not a media access problem that this will solve, but it will generate more noise. I am opposed.
2. Insert new Joint Rule 50-05. Legislative proclamations – polling procedure.
 - a. Opposed for reasons stated above.

From: webmaster@localhost.legmt.gov
To: [Fox, Susan](#)
Subject: Submission from Joint Rules Committee
Date: Wednesday, September 23, 2020 3:15:38 PM

Submit Information to the Joint Rules Committee

Date: 23rd September 2020 15:15

Your Full Name:

Senator Steve Hinebauch

Email Address:

steve.hinebauch@mtleg.gov

Subject Line:

Proposed Rule Amendments

Your Comment:

I support the proposed rule amendments put forth by the Joint Rules Committee September 17, 2020.

Sent via leg.mt.gov/committees/other-groups/joint-rules-committee/jrc-pc-form/

From: webmaster@localhost.legmt.gov
To: [Fox, Susan](#)
Subject: Submission from Joint Rules Committee
Date: Wednesday, September 23, 2020 10:06:14 AM

Submit Information to the Joint Rules Committee

Date: 23rd September 2020 10:06

Your Full Name:

Representative Steve Gunderson HD1

Email Address:

steve.gunderson@mtleg.gov

Subject Line:

Support for amendments

Your Comment:

Rules Committee members, I would like to take a few moments to make public comment to the committee. I fully support the following agenda items: Agenda item #1: Amendment (Ellsworth) to Joint Rule 30-70. Appointment of interim committees. (Allows Speaker and President to be ex officio members to be able to break certain ties.) - Updated 9/18. Agenda item #2 and #4: Amendment (Thomas) to Joint Rules 60-05, 60-10, 60-40 . Source and precedent of legislative rules of the Montana Legislature (to parallel Mason's Manual of Legislative Procedure and amendment to Rules by Polling) - Update 9/18 Agenda item #3: Amendment (Thomas) to Joint Rule 10-180 . Members present physically or by electronic means - No changes from 9/17 version. Agenda item #5: Amendment (Thomas) creating Joint Rule 50-5 . Legislative proclamations -- polling procedure -- No changes from 9/17 version The above amendments have my full support and unless further amended by the author or the author accepts a friendly amendment, I fully support these amendments in their current form.

Sent via leg.mt.gov/committees/other-groups/joint-rules-committee/jrc-pc-form/

From: webmaster@localhost.legmt.gov
To: [Fox, Susan](#)
Subject: Submission from Joint Rules Committee
Date: Wednesday, September 23, 2020 12:22:23 PM

Submit Information to the Joint Rules Committee

Date: 23rd September 2020 12:22

Your Full Name:

Jim Hamilton

Email Address:

Jim.Hamilton@mtleg.gov

Subject Line:

Ideas for rules changes

Your Comment:

I would like to treat these ideas in the same vein as they were offered, hopes from a Republican get together. At the joint rules committee does not exist, by code, in the interim there is really no other way to entertain the ideas. Generally these are not reasonable proposals designed to make the legislature function better. Further their shortcomings are made worse by not being part of a full rules package. These proposed ideas can be looked at in appropriate depth when they are presented, as envisioned by code, after election day when leadership has been nominated, rules committee members appointed and an official meeting is held.

Sent via www.leg.mt.gov/committees/other-groups/joint-rules-committee/jrc-pc-form/



The Treasure State

MONTANA HOUSE OF REPRESENTATIVES

Representative David Bedey
House District 86

September 23, 2020

Representative Derek Skees, Chairman
House Rules Committee
66th Legislature
P.O. Box 201706
Helena, MT 59620

Re: Comments on Proposed Rule Changes

Dear Chairman Skees,

Below is my response to your request for comments on the proposed changes to the legislature's joint rules that are scheduled to be discussed when a joint meeting of the House and Senate Rules Committees is convened on September 24, 2020.

I support the general concept behind several of the proposed changes. For example, increasing the power of the legislature's interim committees as they exercise oversight of executive agency rulemaking is long overdue. But I have substantive concerns about some of the proposed changes.

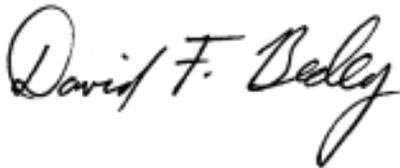
The amendments to Joint Rules 60-10 and 60-40 proposed in JTR POLL 02.AJC would allow joint rules to be adopted, amended, or repealed by "polling" instead of by means of a joint resolution, which is the traditional way rule changes are effected. Joint Rule 40-60(3) dictates that joint resolutions are to be treated as bills. There are sound reasons for this requirement. Subjecting proposed rule changes to the arduous process of bill passage ensures that all legislators have the opportunity to meaningfully participate in the process and inhibits the proliferation of mischievous change requests. Polling should be designed to preserve the sidebars inherent in the joint resolution process. Unfortunately, the changes under consideration provide no details about how polling is to be accomplished. Furthermore, there is no indication as to when polling might be appropriate: Would it be allowed when the legislature is in session, or might it only be available when a state of emergency or disaster is in effect? Given these ambiguities, I cannot support the proposed changes to Joint Rules 60-10 and 60-40.

The new Joint Rule 10-180 proposed in JTR POLL 03.AJC would allow legislators to be present either physically or by electronic means. Effective legislating requires personal interaction among legislators and between legislators and members of the public. This proposal would formalize de-personalization of the legislature, which would likely have negative long-term consequences for good governance of our state. While this rule might be appropriate when a state of emergency or disaster is in effect, no such limits are included in the draft. Therefore, I cannot support this proposed rule.

The two rule changes proposed in JTR POLL 01.AJC appear to conflict with several statutes. While a change to the legislature's joint rules first made in 2017 states that rules take precedence over statute, this assertion has not been tested in court. Legislative counsel has pointed out that in two pre-2017 cases the Montana Supreme Court found that statute takes precedence over rules. If these two proposed changes are made and acted upon, the legislature will surely find itself in court. The decision as to whether to pursue this course of action ought be in the hands of the incoming 67th Legislature, which might determine that the prudent course of action is to amend or repeal the offending statutes rather than going to court.

Is it imperative that the eight rule changes under consideration be made immediately? That case has not yet been made. If urgency cannot be demonstrated, the proposed rule changes should be left for the incoming legislature, which can put them through the deliberative process by which joint rules are traditionally adopted, amended, or repealed by the Montana legislature. This is a conservative approach to change that I would hope we both share.

Respectfully,

A handwritten signature in black ink that reads "David F. Beley". The signature is written in a cursive, flowing style.

cf: Susan Fox, Executive Director, Legislative Services Division