Dr Edina Harbinja, University of Hertfordshire[i] – written submission
NSW Law Reform Commission - Access to digital assets upon death or incapacity

I. The concept of digital assets

1. Digital assets have become significantly valuable to users around the world. As early as in 2013 PwC conducted a survey and found that the users value their digital assets at £25 billion.[ii] Given the exponential growth in digital usage between 2013 and 2018, this figure would be even higher now. However, to my knowledge, there is a lack of recent empirical data to evidence this properly. It is therefore important to at least gather anecdotal evidence from the legal practice in the course of this reform and valid quantitative data, if possible.

2. Despite the growing and recognised importance, the area and the applicable laws are far from clear around the globe. Users, practitioners and service providers struggle to navigate through the complex laws around property law, wills and succession, trusts, intellectual property, data protection, contracts, criminal law, jurisdiction. All these areas are relevant when discussing digital assets and their transmission on death as you rightly note in your brief.[iii] It would certainly be welcomed by practice and good for consumers in NSW and elsewhere to have some legislative clarity on the matter.

3. Conceptually, the notion of digital lacks a proper legal definition, and legislative attempts to define it have been more or less successful (see the US RUFADAA s. 2(10) focusing on electronic records and interests, or Canadian UADAFA s. 1 providing a more suitable definition but again using the inappropriate term 'record', the English and Welsh Law Commission maintains that 'a comprehensive formal definition' is not needed.[iv]

4. From a layman's perspective, digital assets could be anything valuable online, any asset (data, account, file, document, digital footprint) that has a personal, economic or social attachment to an individual. The legal meaning, however, needs more precision. Determining its legal definition and nature would enable an adequate legal treatment and regulation. So far, in scholarship, there have been a few attempts to define and classify them. Most of the definitions are, however, inductive and try to theorise starting from the existing assets online, trying to make appropriate generalisations and classifications.[v] Prof Edwards and I also attempted to define it in our early work in the area.[vi]

5. I believe that a legislative attempt to define digital assets would be welcome. As suggested in our submission to the English and Welsh Law Commissions consultation on wills, Prof Lilian Edwards and I propose that digital assets are defined as **any intangible asset of personal or economic value created, purchased or stored online. These assets could fall within existing institutions of property, rights under contract, intellectual property, personality right or personal data. Another element should be to *exclude* from the definition the infrastructure of hosts, social media sites and websites which they create and maintain e.g. cloud storage, as opposed to the accounts and assets created and occupied by users.** This is for the reason that the infrastructure is owned or protected by their property and intellectual property rights and only serves as an enabler for the creation and storage of assets that are physically and logically placed above that layer of the internet.[vii]

II. Key legal issues – property and copyright

6. Some of the key issues in the area relate to the question whether the content and/or user's account can be considered property or not. Property is also the first legal concept anyone refers to when they think about what they think they 'own'. Thus users might refer to owning their Facebook account, emails, iTunes or Spotify library, YouTube channel, gaming and MMOPG (massively multiplayer online playing games) account etc. Ownership in all of these cases, however, far from what users might expect it to be. It is not property in the sense of their physical possession such as their house, their car or even their poem, composition or novel. This is much more complex during the user's life, and the complexity of law increases once a user passes away. I have examined these on examples of emails,[viii] social network accounts[ix] and virtual worlds.[x] Some authors have argued for propertisation claiming that emails or social network accounts and other assets are clearly users' property.[xi] However, this is not as simple as it sounds and legal and normative arguments in most common as well as civil law countries go against this solution.[xii] Digital object do not fit squarely within these traditional legal concepts of property and ownership.[xiii] Personal data, in particular, cannot be owned and many authors have argued against its propertisation, mainly European,[xiv] whereas the US scholarship has been historically more inclined towards this concept.[xv]

7. User accounts are created through contracts between service providers and users, and the account itself and the underlying software is property/intellectual property of the service provider.

8. However, the legal nature of the content itself is not as clear. If the content is an object of property, then the answer is simple for most jurisdictions, including NSW: it transmits on death, through one's will or intestate succession. Conversely, if the content is not property *stricto sensu*, then it can be protected by copyright and, arguably transmits on death. This matter is crucial to clarity in the powers of administrators to access and collate digital assets when settling an estate.

9. In terms of users' copyright, it is slightly more straight-forward, as a lot of assets would include copyrightable materials, especially when it comes to user-generated content.[xvi] In most copyright statutes, in the NSW as well, copyright subsists in original literary, dramatic, musical or artistic works, sound recordings, films and the typographical arrangement of published editions. Thus, for instance, user posts, notes, poems, pictures and some videos would fall into these categories. In addition, they would to a great extent meet copyright requirements of fixation and originality in the many countries.[xvii] This content would pass on after one death to their heirs for 70 years post-mortem in these jurisdictions and this is not debatable in terms of an entitlement.

III. Contracts and in-service solutions

10. Every 'intermediary' (service provider, platform) such as Facebook and Google, purports to regulate access to and ownership of user-created digital assets on its platforms according to its own terms of service. Therefore, most issues of ownership and access to digital assets are determined at least at first by contract. This is not ideal but in relation to this review, what is key is the impact on transmission of digital assets on death. This is a matter partly governed by contract but also inherently by the law of succession and so part of the concern of the Commission. In particular a

new phenomenon which has the potential to generate uncertainty and litigation in the field of succession has just emerged which we have termed “in-service solutions” or sometimes “social media wills”.

11. In 2013, Google introduced Inactive Account Manager (IAM), as the first in-service solution to address the issue of the transmission of digital assets on death. IAM enables users to share ‘parts of their account data or to notify someone if they’ve been inactive for a certain period of time’. According to the procedure, the user can nominate trusted contacts to receive data if the user has been inactive for the time chosen by him (3 to 18 months). The trusted contacts are after their identity has been verified, entitled to download data the user left them. The user can also decide to only notify these contacts of the inactivity and to have all his data deleted. There is a link directly from the user’s account settings (Personal Info and Privacy section) to the IAM. In addition, the options Google offers the following options if a user does not set up the Inactive Account Manager: closing the account of a deceased user; a request for funds from a deceased user's account, and obtaining data from a deceased user's account. The process is, however, discretionary and Google does not promise that any of the requests will be carried out.[xviii]

12. Facebook’s solution in its terms of use and privacy policy (known as the Statement of Rights and Responsibilities and the Data Use Policy) provides for three main options for dealing with assets on its site (accounts, containing posts, pictures, videos etc.): memorialization, deletion/deactivation, and Legacy Contact. The effects of memorialization are that it prevents anyone from logging into the account, even those with valid login information and password. Any user can send a private message to a memorialized account. Content that the decedent shared, while alive, remains visible to those it was shared with (privacy settings remain ‘as is’). Depending on the privacy settings, confirmed Friends may still post to the decedent’s timeline. Accounts which are memorialized no longer appear in the ‘people you may know’ suggestions or other suggestions and notifications. Memorialization prevents the tagging of the deceased in future Facebook posts, photographs or any other content. Unfriending a deceased person’s memorialized account is permanent, and a friend cannot be added to a memorialized account or profile. Facebook provides for the option of removal of a deceased’s account, but with very general statements and vague criteria. The option is available only to ‘verified immediate family members’ or an executor and the relationship to the deceased needs to be verified. Facebook only promises that it will ‘process’ these requests, without giving a firm promise of fulfilling special requests. Similar works for Instagram, owned by Facebook.

13. As of 12 February 2015, Facebook allows its users to designate a friend or family member to be their Legacy Contact (LC) who is akin to a ‘Facebook executor’, who can manage their account after they have died. The LC has a limited number of options: to write a post to display at the top of the memorialized Timeline; to respond to new friend requests and to update the profile picture and cover photo of a deceased user. In addition, a user ‘may give their legacy contact permission to download an archive of the photos, posts and profile information they shared on Facebook.’ The Legacy Contact will not be able to log into the account or see the private messages of the deceased. All the other settings will remain the same as before memorialization of the account. Finally, an option is that a user decides to permanently delete his/her account after their death.[xix]

14. These in-service solutions are in my view partial and sometimes problematic, but positive. They empower users and foster their autonomy and choice. They are a start towards what may become a

much more comprehensive system of "social media wills" both in terms of the number of platforms offering such, and the number of options they present. For example, it is not hard to imagine a future where such systems might direct assets earned or collected in popular online games to be directed towards chosen legatees. It is well known that young people in the main do not make wills and that a majority of the population dies intestate. It is possible that these in-service solutions may encourage young people (and older!) to think about their future and make decisions about their digital assets. As digital assets created on platforms increase in number, value and emotional and financial significance, this is socially useful, as Prof Lilian Edwards and I argued in our submission to the English and Welsh Law Commission.

15. The main problem with them is that these in-service provisions might clash with a will (possibly made much later in life), or the rules of intestate succession and heirs' interests. To illustrate this, a friend can be a beneficiary for Google or Facebook services, but they would not be heirs and next-of-kin, who would inherit copyright in one's asset for instance. I elsewhere suggests that the law should recognise these service as 'social media wills', and provide for legal solutions embraced by the US Uniform Law Commission in the Revised Uniform Fiduciary Access to Digital Assets Act (RUFADAA).[xx] The terms of service are also intrinsically unclear and contradictory and service providers need to make more effort to clarify them and make them more solid and coherent. Finally, we have no idea how far NSW or any other users are making use of these services, and it would be useful if the Commission could ask these providers to supply the statistics. Researchers have tried to access the data, but in spite of the service provider's transparency in other areas, they have not been very responsive so far. Anecdotally, but also having in mind some unpublished research overseas, I would argue that most users are not familiar with the in-service options. Therefore, users should be made aware of these and service providers need to make more effort in this regard too.

IV. Post-mortem privacy

16. A separate issue surrounding digital assets and death is post-mortem privacy, i.e. the protection of deceased's personal data. Many digital assets include a large amount of personal data (e.g. emails, social media content), and their legal treatment cannot be looked at realistically if one does not consider privacy laws and their lack of application post-mortem.

17. NSW law, like many legal systems, does not protect post-mortem privacy. This is similar in many other countries, both common and civil law ones.[xxi] In English law, for example, the principle has traditionally been *actio personalis moritur cum persona*, meaning personal causes of action die with the person, (see *Baker v. Bolton*).[xxii] This principle has been revised by legislation mainly in many contexts for reasons of social policy, but it persists in relation to privacy and DP.

18. In the EU, The General Data Protection Regulation in recital 27 permits member states to introduce some sort of protection for the deceased's data, and some states have already provided for this protection.[xxiii] The lack of harmonisation is, therefore, is not an ideal situation and does not contribute to the legal certainty for service provider and users.

19. In the Digital Republics Act 2016, France has adopted a solution quite similar to the RUFADAA

(see below).[xxiv] Article 63(2) of the Act states that anyone can set general or specific directives for preservation, deletion, and disclosure of his personal data after death.[xxv] These directives would be registered with a certified third party (for general ones) or with the service provider who holds the data (e.g. Facebook and their policy described above). This is quite a surprising development that brings the US and French approaches to post-mortem privacy closer. This is even odder if we consider conventional and extremely divergent approaches of these jurisdictions to protecting personal data of the living individuals.[xxvi]

20. I argue that post-mortem privacy deserves legal consideration in NSW, drawing an analogy with testamentary freedom, where individuals are permitted to control their wealth pre-mortem and their autonomy is extended on death. They, however, are not entitled to do the same for their online 'wealth', identities and personal data.[xxvii] **It is important to do this in the context of the data protection law reform as well. The Commission should consider if the possible rights of administrators to obtain the contents of social media accounts may infringe unreasonably upon post-mortem privacy: this problem has already been observed in US[xxviii] and German[xxix] jurisprudence and resolved in the US legislation (RUFADAA).**

V. Legal profession

21. Anecdotally, speaking to many European lawyers and notaries in Europe, I have found that most of them do not come across these issues often and they have not been proactive in asking their clients about their digital assets when they are thinking about making a will. I am not aware of examples from NSW, however. A widespread practice in the UK now is that the testators are advised to list their accounts and passwords for their heirs to use after his death. This solution, however, it is in breach of most user agreements (ToS) which could conceivably lead to premature termination of the account. Passwords should change over time and testators may not remember to update the list that they prepared at the time they made their will. Leaving a list like this is also very insecure and leaves users vulnerable for security breaches. Therefore, although these suggestions and advice may be practical, they do not overcome the issues discussed above.

22. Digital estate planning is a developing area, with many tech solutions being developed over the years. Given the lack of regulation and law, this was perceived as a quick solution to deal with digital assets on death.[xxx] They aim to shift the control of digital assets to users by enabling designation of beneficiaries who will receive passwords/content of digital asset accounts. Lamm *et al.* categorise these solutions somewhat differently, focusing on the character of actions they promise to undertake on death. They find four categories: services offering to store passwords; services facilitating administration of digital assets; services performing specific actions (e.g. removing all the data on behalf of a deceased person), and services that currently do not exist, but hypothetically provide their services through partnerships with service providers of the deceased's accounts.[xxxi] This categorisation is very similar to the one I used earlier, with the slight difference that it focuses on actions rather than on business models.[xxxii]

23. In our earlier work, Prof Edwards and I evaluated some of the 'code' solutions and concluded that 'these are not themselves a foolproof solution'[xxxiii] for five main reasons: 1. they could cause a breach of terms of service (due to the non-transferable nature of most assets, as suggested above); 2. There is a danger of committing a criminal offence (according to the provisions of the anti-

interception and privacy laws); 3. The services are inconsistent with the law of succession/executry (they do not fulfil requirements of will formalities; conflicts with the interests of heirs under wills or laws of intestacy may arise; jurisdiction issues etc.); 4. There are concerns over the business viability and longevity of the market and services; 5. the issues of security and identity theft (the services store passwords and keys to valuable assets and personal data).[xxxiv] Beyer and Cahn, and Lamm *et al.* identify most of these problems as well.[xxxv] Öhman and Floridi criticise these from a philosophical perspective as well, submitting that these services commercialise death and dying and violate dignity of the deceased.[xxxvi]

24. It is thus not recommended that the services are used in their current form and with the law as it stands now. However, with improvements in the services and their recognition by the law, they do have a potential to be used more widely in the future. In principle, the services are more suitable for the digital environment, as they recognise the technological features of digital assets and enable an automatic transmission on death. However, due to the issues surrounding them as suggested above, the author does not envisage their legitimate reception in the near future, at least not outside the US.

VI. RUFADAA and UADAFA

25. The US RUFADAA (Revised Uniform Fiduciary Access to Digital Assets Act 2015) includes important powers for fiduciaries regarding digital assets and estate administration. These powers are limited by a user's will and intent expressed in his choice to use online tools to dispose of his digital assets (e.g. Google Inactive Account Manager). User's choice overrides any provisions of his will. If the user does not give direction using an in-service solution, but makes provisions in an estate plan for the disposition of digital assets, the RUFADAA gives legal effect to the user's directions. If the user fails to give any directions, then the provider's terms of service (ToS) governing the account will apply. The Act also gives the service provider a choice of methods for disclosing digital assets to an authorised fiduciary, in accordance with their ToS (i.e. full access, partial access and a copy in a record). Finally, the Act gives personal representatives default access to the "catalogue" of electronic communications and other digital assets not protected by federal privacy law (i.e. the content of communication which is protected and can only be disclosed if the user consented to disclosure or if a court orders disclosure).[xxxvii] I believe that this is a balanced solution, as it respects post-mortem privacy and testamentary freedom, on the one hand, but also provides for solutions when terms of service conflict with wills or privacy and interception laws.

26. The Canadian Uniform Access to Digital Assets by Fiduciaries Act (2016) (UADAFA), as you note in the background information, provides a stronger right of access for fiduciaries than the RUFADA. There is a default access to the digital assets of the account holder, which the fiduciary does not own or otherwise engage in transactions with the asset. In UAFADA, the instrument appointing the fiduciary determine a fiduciary's right of access, rather than the service provider. The Canadian Act indeed has a "last-in-time" priority system, whereby the most recent instruction takes priority over an earlier instrument. A user who already has a will, but nominates a family member to access their social media account after their death, restricts their executor's rights under the will. This is similar to the US RUFADA in that the deceased's will takes priority in any case, the difference is in the mechanism. However, it is true that the RUFADA is more restrictive in honouring ToS in the absence of a user's instruction. Service providers are obliged only to disclose the catalogue of digital assets, and not content. I believe that this solution is more suitable for the online environment, in particular where assets are intrinsically tied to one's identity (communications, social networks, multiple account with one providers such as Google, where these create a unique profile and identity of a user etc.).

VII. Conclusion

27. I, therefore, argue that the Commission should consider digital assets carefully, in order to forestall confusion and legal uncertainty. Digital assets reform as part of the law of wills and succession is already well underway in France (The Digital Republic Act 2016)[xxxviii] and the US or Canada (RUFADAA, UADAFA).

28. I suggest a law equivalent to that in the US providing powers to administrators in relation to digital assets should be included in NSW law, perhaps through a separate act. In addition to fiduciary access, the act should address all the other issues related to property, copyright, criminal law and privacy, so to offer a comprehensive solution. Ideally, there will be amendments to the NSW privacy laws as well, at least in order to broaden the definition of personal data and provide for an option of protecting deceased's data post-mortem through specialised legislation ('lex specialis'), such as an act that would regulate fiduciary access to digital assets.

29. I am happy to provide further assistance and advice to the Commission if required.

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[ii] PwC, 'Digital lives: we value our digital assets at £25 billion', (*PWC*, 2013) available at https://www.pwc.co.uk/issues/cyber-security-data-privacy/insights/digital-lives-we-value-our-digital-assets-at-25-billion.html accessed 10 November 2017

[iii] E. Harbinja, *Legal Aspects of Transmission of Digital Assets on Death* (PhD thesis, University of Strathclyde, 2017), 13-18.

[iv] The US *Revised Uniform Fiduciary Access to Digital Assets Act* (2015); Canadian *Uniform Access to Digital Assets by Fiduciaries Act* (2016); The Law Commission, Making a will, Consultation paper, para 15.55, available at https://s3-eu-west-2.amazonaws.com/lawcom-prod-storage-11jsxou24uy7q/uploads/2017/07/Making-a-will-consultation.pdf

[v] Ibid 18-25.

[vi] L Edwards & E Harbinja 'What Happens to My Facebook Profile When I Die?': Legal Issues Around Transmission of Digital Assets on Death' in C Maciel & V Pereira (eds.) *Digital Legacy and Interaction: Post-Mortem Issues* (Springer, 2013)

[vii] E Harbinja, *Legal Aspects of Transmission of Digital Assets on Death*
(PhD thesis, University of Strathclyde, 2017), 121, 220-225, 245 – 268.

[viii] Harbinja, Edina 'Legal Nature of Emails: A Comparative Perspective' (2016) 14 Duke Law and Technology Review 227, available at: http://scholarship.law.duke.edu/dltr/vol14/iss1/10

[ix] Harbinja, Edina 'Social media and death' in Lorna Gillies and David Mangan (eds) The Legal Challenges of Social Media (Edward Elgar Publishing, 2017).

[x] Harbinja, Edina 'Virtual Worlds – a Legal Post-Mortem Account' (2014) 10(3) SCRIPT-ed 273, available at https://script-ed.org/article/virtual-worlds-a-legal-post-mortem-account/

[xi] F G Lastowka and D Hunter, 'Virtual Worlds: A Primer' in J M Balkin and B Simone Noveck eds *The State of Play: Laws, Games, And Virtual Worlds* (NYU Press 2006) 13-28, 17-18; W Erlank *Property in Virtual Worlds* (December 1, 2012, PhD thesis at Stellenbosch University) 22-23, http://ssrn.com/abstract=2216481; J Darrow and G Ferrera 'Who Owns a Decedent's E-Mails: Inheritable Probate Assets or Property of the Network?' (2006) 10 N.Y.U. J. Legis. & Pub. Pol'y Vol. 281, 308; or J Atwater 'Who Owns Email? Do you have the right to decide the disposition of your private digital life?' (2006) Utah L.Rev 397, 399; J Mazzone, 'Facebook's Afterlife' (2012) 90 N.C. L. Rev. 1643; Banta, Natalie, Property Interests in Digital Assets: The Rise of Digital Feudalism (February 10, 2017). 38 Cardozo L. Rev. 1099 . Available at SSRN: https://ssrn.com/abstract=3000026

[xii] Harbinja PhD

[xiii] See E Harbinja *Legal Aspects of Transmission of Digital Assets on Death,* (PhD thesis, University of Strathclyde, 2017) 121, 220-225, 245 – 268

[xiv] 0 J Litman, "Information privacy/information property" (2000) 52 Stanford Law Review 1283-1313, at 1304; J E Cohen, "Examined Lives: Informational Privacy and the Subject as Object" (2000) 52 Stanford Law Review 1373-1426; N Purtova "Private Law Solutions in European Data Protection: Relationship to Privacy, and Waiver of Data Protection Rights" (2010) 28 (2) Netherlands Quarterly of Human Rights 179-198, or conversely see C Cuijpers, "A private law approach to privacy; mandatory law obliged?" (2007) 24(4) SCRIPT-ed 304-318; Does the EU Data Protection Regime Protect Post-Mortem Privacy and What Could Be the Potential Alternatives?

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[xv] A F Westin, Privacy and freedom (New York: Atheneum, 1967). 40 K C Laudon, "Markets and privacy" (1996) 39 (9) Communications of the ACM 92-104, at 96. 41 P M Schwartz, "Property, privacy, and personal data" (2003) 117 Harvard Law Review 2056-2128. 42 P Mell, "Seeking Shade in a Land of Perpetual Sunlight: Privacy as Property in the Electronic Wilderness" (1996) 11 Berkeley Technology Law Journal 1-79. 43 T Z Zarsky, "Desperately seeking solutions: using implementation-based solutions for the troubles of information privacy in the age of data mining and the internet society" (2004) 56 Maine Law Review 13-59. 44 L Lessig, Code, version 2.0 (New York: Basic Books, 2006).

[xvi] Harbinja, Edina 'Social media and death' in Lorna Gillies and David Mangan (eds) The Legal Challenges of Social Media (Edward Elgar Publishing, 2017)

[xvii] Ibid

[xviii] E Harbinja, 'Post-mortem Privacy 2.0: Theory, law and technology' (2017) 31(1) *International Review of Law, Computers & Technology*, 26-42, 35-37.

[xix] E Harbinja, 'Post-mortem social media: law and Facebook after death' in Gillies, L. & Mangan, D. (eds.). *The Legal Challenges of Social Media* (Cheltenham: Edward Elgar Publishing, 2017) 180-188.

[xx] Harbinja, 'Post-mortem Privacy 2.0: Theory, law and technology' (n 7), 34-35.

[xxi] L Edwards and E Harbinja, 'Protecting Post-Mortem Privacy: Reconsidering the Privacy Interests of the Deceased in a Digital World', (2013) 32(1) *Cardozo Arts & Entertainment Law Journal*, 83-129.

[xxii] (1808) 170 Eng. Rep. 1033.

[xxiii] France and Hungary have already introduced some sort of protection of post-mortem privacy in their legislation. See L Castex, E Harbinja and J Rossi, 'Défendre les vivants ou les morts? Controverses sous-jacentes au droit des données post-mortem à travers une perspective comparée franco-américaine', 2018, forthcoming, Réseaux

[xxiv] LOI n° 2016-1321 du 7 octobre 2016 pour une République numérique

[xxv] For more see Castex, L., Harbinja, E. & Rossi, J. 'Défendre les vivants ou les morts ? Controverses sous-jacentes au droit des données post-mortem à travers une perspective comparée franco-américaine', Revue Réseaux, forthcoming

[xxvi] Ibid

[xxvii] Harbinja, 'Post-mortem Privacy 2.0: Theory, law and technology' (n 7).

[xxviii] *In Re Ellsworth* No. 2005-296, 651-DE (Mich. Prob. Ct. Mar. 4, 2005); *Ajemian v. Yahoo!, Inc.* SJC-12237

[xxix] Kammergericht, Urteil vom 31. Mai 2017, Aktenzeichen 21 U 9/16 https://www.berlin.de/gerichte/presse/pressemitteilungen-der-ordentlichen-gerichtsbarkeit/2017/pressemitteilung.596076.php

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[xxxi] J Lamm et al. et.al. 'The Digital Death Conundrum: How Federal and State Laws Prevent Fiduciaries from Managing Digital Property' (2014) 68 U. MIAMI L. REV., 408.

[xxxii] E Harbinja, *Legal Aspects of Transmission of Digital Assets on Death* (PhD thesis, University of Strathclyde, 2017)

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[xxxiv] Ibid.

[xxxv] N Cahn, 'Probate Law Meets the Digital Age' (2014) 67 Vand. L. Rev. 1697, 1706; J D Lamm et.al. (n 25), 400–01.

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[xxxviii] Loi n° 2016-1321 du 7 octobre 2016 pour une République numérique https://www.legifrance.gouv.fr/eli/loi/2016/10/7/ECFI1524250L/jo