AZSITE Consortium Board Meeting Minutes
January 23rd, 2025
10:02a.m. to 11:30 a.m.

A quorum was obtained.

A. CALL TO ORDER (Jim Watson)

      Meeting called to order at 10:02 a.m.

      Board members present:

            Jim Watson, 2025 Chair, Arizona State Museum (ASM)

            Christopher Caseldine, Arizona State University (ASU)

            Jeff Burns, Museum of Northern Arizona (MNA)

            Mary-Ellen Walsh, Arizona State Historic Preservation Office (SHPO)

      Members of the public present:

            Gabe McGowan (AZSITE Manager)

            Ellie Maria Renteria (AZSITE GIS Technician)

            Grace Keesling (US Air Force)

            Abraham Arnett, City of Mesa Archaeologist

            Cristina Rocha (University of Arizona RII)

            Danny Sorrell (HDR)

            Tim Goddard (ASM ARO)

            Jenni Rich (Logan Simpson)

            Kate Rosenbaum (North Wind Resource Consulting)

            Dan Garcia (Salt River Project)

            Amber Redger (Western Area Power Administration)

            Stephanie Bosch (AZTEC)

            Karl Hoerig (Pascua Yaqui THPO)

B. Introductions

    1. Members of the AZSITE Board were introduced.

C. Agenda Items – The Board may consider or take action on any of the following:

    1. **Discussion and Approval of 4ʳᵈ Quarter 2024 Meeting Minutes** (Watson)

        a. *Motion to approve (Mary Ellen)*

        b. *Seconded (Caseldine)*

        c. *Approved (Unanimous)*

    2. **Finance Report and FY 2026 Draft Budget** (McGowan)

        a. McGowan presents:

            1. University of Arizona Financials FY25 fund summary dated 1/5/2025

                a. Beginning balance: $133,719

                b. Total income: $147,565

                c. Total expense + encumbrances: $184,537

d. Current balance: $208,605

e. Uncommitted cash: $97,016

2. Updated financial numbers from 1/21/2025:

a. Beginning balance: $133,719

b. Total income: $171,435

c. Total expense + encumbrances: $187,732

d. Financial year balance: $(16,297)

e. Uncommitted cash: $117,421

f. Outstanding invoices: $54,200

3. User Applications and Billing (Table 1)

a. McGowan notes that participation looks to have decreased slightly over 2024, possibly due to the final year of fee increases.

4. Fiscal Year 2025 Budget Projected vs Actuals

a. Personnel costs: $162,969 projected; $152,137 actual/remaining projected.

1. McGowan notes this is lower than expected in part because ASM has not been able to rehire a database manager, who in past years has dedicated 5% effort to AZSITE, and because the projections were based on Renteria being full-time for the entire FY, but she did not increase to full-time until October.

b. Operations costs: $37,227 projected; $34,683 actual/remaining projected.

1. McGowan notes that server hosting costs have been lower than projected, and that with turnover at ASU Geospatial Research Solutions (ASU GRS), AZSITE personnel are handling more maintenance tasks, reducing the amount billed by ASU GRS.

2. Watson inquires if ASU GRS bills annually. McGowan states that they bill quarterly.

3. McGowan notes that AZSITE GIS Technician Renteria needs a new workstation due to performance issues, and that they are awaiting a quote from ASM IT. An estimated cost of $4,000 is included in projected operations costs.

c. McGowan notes that overall, it appears FY25 spending will be less than projected.

5. Fiscal Year 2026 Draft Budget

a. Projected personnel costs: $166,723.

1. McGowan notes this assumes ASM will hire a database manager, and that 5% of this person's effort will be paid by AZSITE.

b. Projected operations costs: $44,235.

1. McGowan notes this includes a possible cost to replace his workstation, which will be aging past five years in this time horizon.

2. McGowan notes this also includes roughly $12,000 for possible migration to ArcGIS Enterprise, which will be discussed more in detail during the AZSITE updates agenda item.

c. Total projected spending: $212,458.

1. Accounting for UA fees on spending and revenue, the total amount would be $243,491.

2. Walsh inquires about the UA IDC 2% percent on expenditures and 11% on income.

3. McGowan notes that this is a 2% fee to the University on every dollar AZSITE spends (IDC or indirect costs fee). In addition, the University takes 11% of all revenue. These are accounted for in the draft budget to project how much income is needed to cover personnel and operating costs as well as administrative fees.

4. Walsh inquires if this could be negotiated with UA. Watson notes that these rates are significantly lower than the approximately 50% IDC charged by UA on grants.

5. Walsh inquires if credit card fees, estimated as a $6,000 line item in operating costs, could instead be passed on to the customers.

6. McGowan notes that there are specific compliance issues around explicitly passing these fees on to the users, and that instead AZSITE tries to account for this cost in the overall rate that is charged.

d. Watson invites Rocha (Business Manager in UA Research, Innovation, and Impact Business Office) to address the Board.

1. Rocha stated that, in fact, in FY 2025 the UA is not charging 2% indirect costs on spending or the 11% administrative service fees on income. This was related to the University of Arizona Financial Action Plan but could be subject to change in future years.

2. Watson asked Rocha to clarify the IDC rates for grants.

e. Rocha stated it is currently 53.5% for most grants, and 47% for museum programs.

f. Watson provided general context on the University of Arizona Financial Action Plan implemented in late 2023.

3. **Large Data Clip Request** (McGowan)

a. McGowan noted that the AZSITE Data Clip Policy states: "Fee paying AZSITE users with current annual accounts may request data clips totaling more than 1,000 sites and/or projects. These large requests […] require approval by the AZSITE Consortium Board […] at a quarterly meeting."

b. Jon Shumaker, Archaeologist at Luke Air Force Base, is requesting a data clip on behalf of the United States Air Force.

1. The area of interest is more than 27,400 square miles, including large swathes of tribal reservation land and New Mexico. For these areas, AZSITE will have no or limited data.

2. This AOI intersects 2,604 project features and 6,648 site features in our geodatabase.

3. The reason for this request is the Arizona Airspace Optimization Environmental Impact Statement. Shumaker has provided a detailed written statement about the reason for the request, how the data will be used, and how the data will be stored (Attachment A), which was provided to the Board prior to this meeting.

4. Watson inquired if the Air Force had obtained permission from the relevant tribes to obtain data available to AZSITE the reservation areas within the AOI.

5. McGowan stated that the Air Force had not provided any permissions from Tribes, and that the numbers presented reflected the standard AZSITE data. If permissions are provided for the relevant Tribes, AZSITE can provide any legacy data that are available.

6. The Board recognizes Grace Keesling from the US Air Force to speak about the request.

7. Keesling stated that she is the Environmental Impact Statement Project Manager for the Air Force for the project, and that she is in attendance to answer any questions.

8. Caseldine commented that the project in question may entail significant impacts to archaeology through the deployment of chaff and flares at lower altitudes, and that there has been a problem at Tonto National Monument with jets flying at low altitude.

9. Keesling clarified that the Arizona SHPO had requested the US Air Force to make this request as part of NHPA Section 106 consultation. The SHPO has requested that the US Air Force identify eligible but not listed sites from the AZSITE database to assess the full potential for impact under the proposed action. Keesling stated that the US Air Force has been in consultation with the SHPO, with the National Park Service, and with tribal governments.

10. Walsh noted that there will be a full evaluation under Section 106 and the NHPA. Walsh noted that while there may be concerns about the outcome of the project, providing data to support the Environmental Impact Statement should be considered independent of those potential outcomes.

Approval of Large Data Clip Request (Watson)

11. *Motion to approve (Walsh)*
12. *Seconded (Caseldine)*
13. *Approved (Unanimous)*

4. **Data Sensitivity Training** (McGowan)

   a. McGowan noted that the [AZSITE Access Policy](#) was updated in 2022. The update included a provision allowing AZSITE access for state and federal agencies, NPS-certified local governments (CLGs), other local governments, and public utilities without staff meeting the Secretary of Interior's Professional Qualification Standards where certain conditions are met. One of these conditions is a review from SHPO, and another is the completion of a data sensitivity training to provide context to users that might not have it through their education and professional training. So far, in 2025, there are three individual users from three local governments and state agencies that meet these criteria; in 2024, there were five qualifying individuals in total.

   b. McGowan stated that the AZSITE Ad Hoc Advisory Committee developed a draft AZSITE Data Sensitivity Training in 2022 and 2023. This training is intended to provide specific context about the unique sensitivity of cultural resource data, as well as to provide guidance on what conclusions can be drawn from AZSITE.

   c. McGowan stated that, at the advisement of the board, in the fall of 2023 AZSITE started a tribal consultation effort seeking perspectives from tribes to include in the training, including any multimedia materials or language they would like to see included. Consultation letters were distributed in fall 2023, spring 2024, and fall 2024. The results were a meeting with the White Mountain Apache Tribe Tribal Historic Preservation

Office and presenting about the draft training at the Four Southern Tribes Cultural Resource Working Group meeting in July 2024. Following that, the ASM repatriation office provided feedback on the draft training, including specific language. McGowan noted that, while, the specific contributions and perspectives received from tribes are limited, he recommends moving forward with the training, so that something is in place for the intended audience. He stated that the training can continue to be updated in the future.

d. Walsh inquired if a Tribal cultural sensitivity training could also be required, such as the one available from the Salt River Pima-Maricopa Indian Community (SRPMIC). Walsh stated that this information is much more meaningful when it is heard from tribal members directly. Walsh requested that this also be added as a requirement for AZSITE user organizations lacking professional archaeologists on staff.

e. Watson noted that there is a virtual option for the SRPMIC training.

f. McGowan noted that the draft training attempts to bring to mind the specific sensitivities of site information in AZSITE as it pertains to living communities in our state, but that it is also focused on providing guidance on the specific conclusions can be brought forward by the AZSITE Data.

g. Watson stated that requiring the SRPMIC cultural sensitivity training would be a good addition.

h. McGowan inquired if the Board would like to vote on adding that to the access policy at a future meeting.?"

i. Watson stated yes but noted that doesn't prevent the Board from voting on the draft training if the members are amenable.

j. The Board recognized Karl Hoerig (Pascua Yaqui THPO).

k. Hoerig inquired if the draft AZSITE Data Sensitivity Training was available to be viewed online.

l. McGowan stated that it has not yet been posted or recorded, but it would be pending a vote in this meeting. McGowan noted that he would separately send it to Hoerig and would value any input. Hoerig stated that he would review and provide any input that he could.

m. Watson recommended that the Board move forward with a vote to approve the draft training. Watson stated that any notable changes provided by Pascua Yaqui may require another Board vote, but minor changes provided can be implemented without a vote.

Watson reiterated that tribal input is desired, but that it has taken some time to get to this point and the Board wishes to move forward. Hoerig agreed.

Motion to Approve the Draft Data Sensitivity Training (Watson)

1. *Motion to approve (Caseldine)*
2. *Seconded (Burns)*
3. *Approved (Unanimous)*

5. **AZSITE Updates** (McGowan and Renteria)
   a. McGowan provided a summary table of uploads by calendar year (Table 2)
   b. McGowan noted that uploads have increased with more materials available to AZSITE from ASM and other agencies, and with GIS Technician Renteria joining AZSITE in 2024.
   c. McGowan provided a table summarizing progress on upload of newer ASM materials that have been made available to AZSITE (Table 3). McGowan noted that this was in response to a request from the Board for more information on the status of these newer items.
      1. 1,010 / 1,349 ASM Archaeological Records Office / Permits Office reports uploaded (75%)
      2. 1 / 60 ASM Repository Reports (2%)
      3. 685 / 791 ASM Archaeological Records Office / Permits Office negative surveys uploaded (87%)
      4. 380 / 558 ASM Archaeological Records Office / Permits Office projects with sites (68%)
      5. 378 / 378 original ASM site recordings (100%)
   d. McGowan provided a summary of items in the Newly Recorded ASM Sites GIS layer. This is a provisional layer providing a centerpoint for a site that has not been fully curated at ASM and thus has not been passed to AZSITE for upload or otherwise has not been uploaded by AZSITE. Of the approximately 6,000 sites in this layer, roughly 100 (2%) have a curation status indicating they are available to AZSITE for upload; most of these are lacking enough documentation for AZSITE to upload them.
   e. McGowan noted that Tim Goddard has just started in the position of ASM Archaeological Records Office (ARO) Manager and has expressed that he would like to be on the agenda for future AZSITE Board meetings to provide updates. McGowan noted that ARO workflows are being updated to improve and streamline the flow of data

from ARO to AZSITE. McGowan noted that, in the past, Caseldine has requested information on the length of time that new projects are in review in the ARO before they appear on AZSITE. He stated that the ARO's target is 30 days for report review, that requests for revisions from submitters can extend that, and that, on average, more projects are completed than are received each month.

f.   Watson noted that there has been a lot of flux in the ARO in the past two years including personnel changes, and with the UA hiring freeze there was a long period where the ARO has been functioning without a manager or assistant manager. Watson noted that the ASM Repository Manager Katie MacFarland has been acting as ARO Manager as well.

g.   The Board recognizes ASM ARO Manager Tim Goddard to speak.

h.   Goddard stated that he is in his second week in the role and is getting a sense of where things stand. He noted that the ARO team hopes to revise their workflows and tracking so that materials are submitted to AZSITE in a timely manner.

i.   Watson noted that the ASM ARO and AZSITE were previously one office and were separated in 2018.

j.   McGowan provided a table summarizing uploads of materials from ASU, MNA, and US Fish and Wildlife Service.

  1.   ASU Site Forms: 1,016 / 1,180 non-Tribal uploaded (86%); 699 have GIS boundaries (59%)

  2.   MNA Project Reports: 53 / 970 uploaded (5%)

  3.   USFWS Sites: 179 / 399 uploaded (45%); 171 site forms uploaded (41%)

  4.   USFWS Projects: 14 / 19 uploaded (74%); 10 reports uploaded (53%)

k.   Renteria provided a detailed analysis of AZSITE Data Clip requests.

  1.   See AZSITE Data Clip Requests presentation (Attachment B)

  2.   Requests from 9/5/2024 to 1/13/2025 included

    a.   65 requests by 15 individuals from 13 companies

  3.   On average, roughly 80 site/project features are provided per request. The median number is around 20 features.

  4.   Three companies made 2/3 of the requests: Terracon (22 requests), Tetra Tech (11 requests), and Colliers Engineering (11 requests). However, the total data volume delivered to these companies was smaller than that delivered to other organizations making fewer, larger requests.

5. Tetra Tech was the only organization with users with 30 day accounts requesting data clips. Other requestors had annual accounts. However, the requestors from Tetra Tech do not request more than 30 clips per year.

6. Renteria stated that she estimates she spends approximately 4 hours per week on average processing Data Clip requests. Individual requests commonly take between roughly 10 minutes and one hour.

7. Caseldine noted that 10% of Renteria's time corresponds to roughly $6,000 per year, which is significant. He stated that the Board should consider this is real money being expended beyond the fees that are collected for AZSITE access.

8. Renteria noted that a benefit of a new workstation for her will be less processing time on the data clip requests.

9. McGowan stated that he was interested if this analysis would indicate that some users with 30 day accounts were requesting more than 30 data clips per year, but that this is not the case in the results.

10. Renteria noted that her time in processing data clips can be elevated by errors caused by heterogeneity in the data, but that this has decreased over time as more of these issues are identified and corrected. She noted that this is also a broader benefit to users of the dataset.

11. Watson inquired if the data clip requests are actually helping to clean the entire AZSITE dataset. Renteria and McGowan stated that this was true.

12. Caseldine requested that Renteria and McGowan continue to monitor the resources dedicated to processing data clips.

l. Advisory Committee Updates

1. McGowan stated that all members of the AZSITE Advisory Committee on record with Governor's Boards and Commissions Office are no longer eligible or wish to resign their respective positions. AZSITE has been in communication with Boards and Commissions and will be working to recruit applicants for these positions.

2. Walsh stated that filling these positions is necessary, especially if rate increases need to be considered.

3. McGowan noted that, with the Advisory Committee as a high-level administrative advisory framework, a detailed user feedback survey is also under development to provide another means of advisement to AZSITE from the user perspective.

4. Watson inquired if such a survey has been done before. McGowan stated that these have been done primarily with respect to fee changes, to facilitate budget projections.

m. Data Updates

1. McGowan noted that the ASM Library and Archives digital catalog has moved to a new platform, and that he has obtained the necessary data to crosswalk hyperlinks to the old ASM Library and Archives digital catalog from AZSITE's reference data so that they will point to the new catalog permalinks.

2. McGowan stated that the NPS Data Sharing Agreement approved at the last Board meeting is awaiting final approval and funding on the NPS side.

n. Development

1. McGowan stated that he is investigating moving some of AZSITE's user management and invoicing functions to the QuickBase low-code platform. ASM migrated their quotes and invoicing system to this framework in 2024, and the same service is available to AZSITE via the University of Arizona Cooperative Extension. There are no anticipated costs at this point beyond McGowan's time, but if additional support is required a cost estimate will be brought to the Board.

2. McGowan noted that a round of enhancements to the AZSITE Attribute Search web application were deployed in December 2024, including the partner agency document library module funded by the US Fish and Wildlife Service, a document library for MNA reports, and a data clip delivery mechanism incorporated into this app.

o. ESRI Enterprise Migration

1. McGowan noted that AZSITE currently uses standalone Esri ArcGIS Server (AGS) GIS services, along with an Esri WebAppBuilder Developer Edition (WAB DE) mapping app. McGowan stated that Esri is retiring ArcGIS Desktop in March 2026, and currently most AZSITE GIS services are published from ArcGIS Desktop. He also stated that WAB DE went out of support last July. McGowan noted that neither retirement presents an urgent problem to AZSITE, but it does make it harder to troubleshoot issues when they arise, because Esri support will just say that these products are out of service. Over time, it will become more urgent.

2. McGowan stated that, for these reasons, ASU GRS has recommended migrating AZSITE to ArcGIS Enterprise (AGE). AZSITE would publish services on its own

AGE instance and then develop a new web mapping app using Esri's newer Experience Builder (XB) framework.

3. McGowan stated that there would be several advantages to the move, including more flexibility in app deployment and internal workflows. McGowan noted that AZSITE would not be able to license all AZSITE users on AGE and would instead proxy access to the data along the lines of what is currently done.

4. McGowan noted that only a rough estimate has been provided by ASU GRS, in the amount of roughly $12,000. He stated that he hopes to have a more detailed proposal from ASU GRS at the Board meeting.

5. Walsh inquired if the NPS Preservation and Technology and Training Grant could be a good fit for this project.

6. McGowan stated that AZSITE is looking at that possibility, but that the grant announcement emphasizes innovation and cutting-edge approaches, which may not be a good fit for a migration to AGE.

7. Walsh stated that it may still be worth applying because the value is critical to Arizona. McGowan noted that a migration to AGE may be an opportunity to rethink AZSITE's data structures and enhance things in that way.

8. Goddard commented in the Zoom chat that specific functionality in an XB app could be highlighted in a grant application.

p. Q&A
1. Walsh inquired about the number of sites and projects on private land that are coming in to AZSITE.

2. McGowan stated that no private lands data beyond that arriving via ASM or the USFWS has been received. He confirmed that AZSITE does not charge to put these data online. He noted that it may be necessary to highlight that submissions of this type are an option in a new way.

3. Walsh stated that for planning purposes it would be helpful if people could be convinced to submit that info to AZSITE.

4. McGowan stated that one issue would be that updates to ASM site numbers, even on private land, would still need to go through ASM.

D. **Public Comment**
a. Watson stated that ASM has published a proposal for new fees on the ASM website, and that the Arizona Board of Regents has sent it to be published in the State Register. He noted that once that is complete a 30-day public comment period will be planned, one in Tucson, Phoenix and Flagstaff. He stated that public comment from the last fee increase was incorporated, and

encouraged attendees of this meeting to attend one of the public meetings regarding the new ASM fees.

E. Date and Time of Next Meeting

Proposed Next Open Meeting: April 17th, 2025, time: 10:00am

Location: Zoom (https://arizona.zoom.us/j/84892911228)

F. Adjournment

a. *Motion to adjourn (Watson)*

b. *Seconded (Walsh)*

c. *Approved (Unanimous)*

d. *Meeting adjourned at 11:30am*

Table 1: AZSITE User Applications and Billing

	2021	2022	2023	2024	2025
User Organizations	109	114	117	132	89
Users	331	356	373	431	357
Mercator Users	218	237	259	281	226
$ Invoiced	$126,075	$138,350	$145,900	$233,555	$200,910
$ Not Yet Paid	-	-	-	-	$54,200

Attachment A: USAF Data Clip Request Justification

AZSITE Request to Support National Historic Preservation Act Consultations associated with the Environmental Impact Statement for Regional Special Use Airspace Optimization to Support Air Force Missions in Arizona

The Department of the Air Force (DAF) is proposing to alleviate training shortfalls and address evolving training needs for aircrews stationed at Davis-Monthan Air Force Base (AFB), Luke AFB, and Morris Air National Guard Base in Arizona by requesting that the Federal Aviation Administration implement modifications to existing DAF-managed military operations areas (MOAs) and air traffic control assigned airspace (ATCAAs). Much of the DAF-managed MOAs available to aircrews in this region were first charted decades ago and minimal improvements have been made over time in response to changes to the DAF aircraft inventory, new training requirements, or expanded missions. Thus, there is a need to optimize existing MOAs and ATCAAs by modifying the published times of use to align with existing training times; volume, including lowering the minimum operational floors for some MOAs to as low as 100 feet above ground level (ft AGL); minimum altitude for supersonic flight to 10,000 or 5,000 ft AGL depending on alternative, use of chaff in MOAs where use is not already authorized, and lowering the release altitude for flares to align with proposed lower operational floors. These modifications would ensure the availability of appropriate airspace to accomplish essential training requirements for aircrews stationed in Arizona. Ten (10) MOAs/ATCAAs overlying Arizona are proposed for optimization – additional details can be found on the EIS project website: https://www.arizonaregionalairspaceeis.com/.

During consultation with the Arizona State Historic Preservation Office (SHPO) on the Environmental Impact Statement (EIS) for this action, as required by Section 106 of the National Historic Preservation Act (NHPA), the Arizona SHPO requested that DAF expand our identification of historic properties to include eligible, non-listed properties and districts within the area of potential effect (APE) from AZSITE. This data would be used to ensure a thorough analysis of potential effects of the EIS proposed action on historic properties, to support identification of appropriate measures to mitigate or minimize any potential impacts identified, and ultimately to support the NHPA Section 106 consultation with the Arizona SHPO.

Data would be reviewed by DAF, Arizona SHPO, and DAF's contractor personnel for this EIS. Relevant data would then be summarized in the EIS analysis, as well as in the NHPA Section 106 assessment of potential effect to historic properties. Specific locations of properties identified would not be shared with the public and no figure will be published to depict these locations. Neither the DAF nor the DAF's contractor personnel for this EIS will utilize this data for any effort outside of this current EIS. Data would be stored and managed to prevent unauthorized access from within the DAF and DAF's EIS contractor, or from external actors. Data would not be transmitted, stored, or backed up on personal cloud storage accounts. In accordance with the Administrative Procedures Act, this data would be maintained in the DAF's EIS Administrative Record. The Administrative Record is not publicly releasable, and DAF will include this data in a protected portion of the Administrative Record along with all other data that is not approved for public release (e.g. attorney/client privilege information, information on Traditional Cultural Properties received from the tribes, etc.).

Table 2: Summary of Data Uploads by Year

Mean Annual (past) Total Annual (current)	2004-2014	2015-2019	2020	2021	2022	2023	2024	2025
Projects	951	109	452	2,225	172	220	421	52
New Sites	1,497	194	1,084	4,087	1,663	696	387	18
Site Updates	-	-	752	5,033	299	360	578	101
ASM PRFs	-	-	335	231	257	361	400	-
New/Updated ASM Site Cards	-	-	322	511	405	743	169	56
ASM Reports	-	-	-	-	4	3,975	2,401	54
ASU Site Cards	-	-	-	-	117	56	810	33
MNA Reports	-	-	-	-	-	-	53	-
USFWS Site Forms	-	-	-	-	-	-	171	-
USFWS Survey Reports	-	-	-	-	-	-	10	-
SHPO Site Info Entries	-	-	-	-	-	872	982	-
SHPO Project Info Entries	-	-	-	-	-	1,266	1,456	-
SHPO NRHP Eligibility Dets.	-	-	-	-	-	806	812	-

Table 3: Summary of Upload Progress, ASM New Fee Structure

Type	Total Available to AZSITE	Uploaded	Outstanding
ARO/PO Reports	1,349	1,010 (75%)	339 (25%)
REPO Reports	60	1 (2%)	59 (98%)
ARO/PO Negative Surveys	791	685 (87%)	106 (13%)
ARO/PO Projects w/ Sites	558	380 (68%)	178 (32%)
Original Site Recordings	378	378 (100%)	0 (0%)

Attachment B: Analysis of Data Clip Requests