

Written evidence submitted by Laura Aade, Thales Bertaglia, Sophie Bishop, Hayleigh Boshier, Angèle Christin, Daniel Ershov, Catalina Goanta, Giovanni De Gregorio, Gemma Newlands, Christine Riefa, Jerry Spanakis, Jeremy Yang and Isabelle Wildhaber

Attention: UK Parliament, Digital, Culture, Media and Sport Committee

7 May 2021

Re: Influencer culture inquiry

Written evidence submitted by (in alphabetical order):

[Laura Aade](#) (M.Sc. in Public Policy and Human Development, Maastricht University)

[Thales Bertaglia](#) (PhD Candidate, Maastricht University)

[Sophie Bishop](#) (Lecturer in Digital Marketing and Communication, King's College London)

[Hayleigh Boshier](#) (Senior Lecturer in Intellectual Property Law, Brunel University London)

[Angèle Christin](#) (Assistant Professor of Communication and Sociology, Stanford University)

[Daniel Ershov](#) (Assistant Professor of Economics, Toulouse University)

[Catalina Goanta](#) (Assistant Professor in Private Law, Maastricht University)

[Giovanni De Gregorio](#) (Postdoctoral Researcher, Oxford University)

[Gemma Newlands](#) (PhD Candidate, University of Amsterdam/BI Norwegian Business School)

[Christine Riefa](#) (Reader in Consumer Law, Brunel University London)

[Jerry Spanakis](#) (Assistant Professor in Data Mining and Machine Learning, Maastricht University)

[Jeremy Yang](#) (PhD Candidate, Massachusetts Institute of Technology)

[Isabelle Wildhaber](#) (Full Professor in Private and Business Law, University of St. Gallen)

This is a response to the public inquiry on Influencer Culture launched by the UK Digital, Culture, Media and Sport Committee. The authors of this policy brief are academic scholars from nine universities located in six countries (United Kingdom, Netherlands, Norway, France, Switzerland, United States), and representing five different scientific disciplines (computer science, media and communication, law, sociology and business). This written evidence is the result of a focus group on consumer harms and content monetization convened by Dr Catalina Goanta and Dr Christine Riefa (assisted by Laura Aade) in early May 2021 that considered a selection of the inquiry questions. All authors of this brief are experts and have a track record of publications in the field of social media and influencer marketing. The team includes academics from around the world because influencer marketing is a phenomenon that goes way beyond the geographical borders of the UK and needs to be thought of globally.

1. How would you define 'influencers'?

It is important to highlight that **defining the term 'influencer' is very challenging. It is not defined in law.** However, the CMA in its Guidance (2019) explained: 'Popular bloggers, vloggers, celebrities and social media personalities (also referred to as 'influencers') can have a lot of influence over people's buying decisions if they promote a product or service in their posts.' This approach suggests that the focus is on the influence exercised on buying decisions.

However, **defining influencers is** a lot more **complex**. Indeed, terminology may vary when referring to influencers. The implications of business models such as influencer marketing have to a certain degree tainted the connotation of the term ‘influencer’, which is gradually being replaced with broader terms such as ‘content creator’ or platforms-specific terms such as ‘Youtuber’ or ‘TikTokker’. In addition, while influencers may be more associated with some business models (e.g. influencer and affiliate marketing, barter), it is noteworthy that content monetization business models on social media can be much broader, and also include e.g. crowdfunding (e.g. reward-based income fundraising on platforms such as Patreon), direct selling (e.g. merchandise) and platform ad revenue (e.g. advertising via Google AdSense). Moreover, the industries where influencers are active vary widely. Influencers are not necessarily consumeristic. One prominent example is knowledge influencers who create educational content, who use advertising business models, but for social entrepreneurship. Lastly, there is broad consensus that a lot of uncertainty exists regarding legal personhood (e.g. are influencers consumers, freelancers, incorporated businesses). Some influencers also are AI generated and thus questions surround their legal personality, which would have implications with regards to allocating liability.

To cut through this complexity, there are **two proposed approaches to defining who an influencer is**:

- **Determining** instead **what an influencer does**, and whether these activities are or should be considered tasks that lead to a clear occupational profile, by performing a functional, ILO-inspired analysis of the tasks at hand, as well as associated competencies. This approach allows a task-based occupational definition, as opposed to a more identity-based concept.
- A **general definition** loosely based on influencer activities on social media can be ‘anyone that seeks to make money from their social media content production’.

2. Is it right that influencers are predominantly associated with advertising and consumerism, and if not, what other roles do influencers fulfil online?

While influencer marketing has been in the spotlight, other types of influencing are clearly on the rise, such as B2B influencing (whereby influencers focus on business audiences instead of consumers) or political influencing (which may entail different business models). There are many emerging cases of influencer marketing that raise questions about the boundaries between commercial speech and political speech.

3. How are tech companies encouraging or disrupting the activities of influencing?

The term ‘tech company’ can cover a wide range of platforms, including social media companies (e.g. Facebook, Instagram, TikTok), music platforms (e.g. Spotify) or crowdfunding platforms (e.g. Patreon). The focus on different categories and/or examples of ‘tech companies’ may entail a diverse range of visibility for influencer activity. Some platforms, such as Spotify, may monetize content creator work in a more secretive way (e.g. by paying them for curated playlists) compared to other platforms.

In general, platforms (tech companies) encourage the activities of influencing. Influencers are the creators of content, platforms are the distributors. Platforms can benefit from advertising and/or selling to the users attracted by influencers. Because of this, it is in the interest of platforms to maximize influence and exposure. However, they are instances of disruption and control exercised on content and activities that are seen as disruptive by content creators, including:

- **Content moderation:** Deplatforming and demonetization disrupt existing business models. Platform discretion in deciding who and what content can be deplatformed or demonetized creates an unstable business environment. Creators may be in danger of being removed from the platform or being barred from gaining revenue at a moment's notice and without real transparency. Platforms may take such measures unilaterally, based on their opaque interpretations of community guidelines. Besides, creators depend on algorithmic visibility, and there are instances where not all content creators are treated equally due to the fact that visibility can be based on a predilection of audiences to consume sensationalistic, controversial or radical content.
- **Supply chains:** Platforms and influencers are only a part of the supply chains emerging around content monetization. Other actors such as talent agencies, social media companies, multi-channel networks (MCNs), manufacturers, advertising agencies exist in this landscape, and questions arise regarding their role in sharing responsibility towards consumers. A particularly noteworthy dimension of this discussion is reflected by data supply chains. Influencers attract and base their economic activity on algorithmic measurements of popularity, such as engagement, impressions or reach. Data resulting from their activity (e.g. demographic data) is handled by an opaque supply chain, and it is unclear under which legal standards this data is being processed.
- **Exclusivity:** Many influencers advertise and monetize without the platform's direct involvement: they contract with brands directly or through third party marketing agencies, post ads directly in their feeds, and receive money through platforms like Patreon. But as the influencer market becomes bigger, social media platforms' upstream market power should raise concerns. Platforms are likely to encourage influencers and brands to monetize and advertise through the platforms directly. YouTube's ban on Patreon links is one example. The increased prominence of platform-provided advertising (as opposed to ads in influencers' feeds) is another. Future concerns could include restricting the flow of data on engagement and reach that is essential for independent influencers and third party agencies.
- **Business volatility:** Business models are unstable due to the fast paced changes in demand and supply. Influencer professionalization may contribute to the stabilization of this industry, and in turn may lead to multi-platform practices and strategies (e.g. using a social media platform to gain initial exposure, and redirecting economic activity to other platforms, such as own websites, or other platforms).

There is a need for greater clarity in the legal obligations that fall on influencers alongside all actors in the supply chain and an urgent need to scrutinise the control of platforms in this ecosystem. The current legislative changes regarding big tech at EU level (notably the Digital Market Act) and in the UK with the creation of the Digital Market Unit within the CMA to enforce a code of conduct for large online platforms are unlikely to be sufficient to control behaviours in this area.

4. How aware are users of the arrangements between influencers and advertisers? Should policymakers, tech companies and influencers and advertisers themselves do more to ensure these arrangements are transparent?

There is strong agreement amongst experts that users of social media platforms are likely to have little understanding of the 'influencer economy'. However, using **transparency as public policy, although welcome, is unlikely to be sufficient** to tackle consumer issues arising out of the activity of influencers on social media.

- **Disclosure rules for advertisers (including influencers):** more research is necessary to determine the usefulness of disclosures on social media, as well as the digital literacy of consumers with respect to influencer business models. Consumer disclosure regulation already exists, but challenges arise out of the problematic interpretation of current standards to business practices which are not sufficiently clear for regulators, authorities or courts (e.g. images that are retouched with body or face filters may contribute to unfair commercial practices, but are currently not interpreted as such). It should also be clarified how responsibility is shared in the supply chain for the disclosure of advertising.
- **Digital enforcement:** even if disclosure rules become more clear, it is not clear how public authorities are and ought to be dealing with the scaling of monitoring. The interpretational issues referred to above also spill over into enforcement, making it difficult to determine what exactly should be monitored (e.g. would consumers behave differently if they knew a post was sponsored). In any event, the CMA has given ample guidance (2019) on how to be transparent and yet would need to devote large resources to monitoring and eliminating unfair practices given their volume.
- **Consumer behaviour:** Recent theoretical and empirical economics research finds that when intermediaries (influencers) are not directly compensated by their followers, disclosure or transparency regulations can backfire, increasing the amount of advertising on the platform at the expense of organic content and potentially reducing user/follower welfare.

As a result the authors of this response would like to encourage Parliament to review other regulatory frameworks, which could include:

- **Self-regulation:** A lot of self-regulation exists (e.g. in media law), but depending on how these rules are enforced, there may be silos of expertise that do not communicate.
- **Fair business practices:** Depending on their expertise, influencers may be vulnerable from an informational perspective, and often not be aware of business practices. This leaves them vulnerable to predatory practices that exploit their economic activity. Different levels of support and awareness (e.g. governmental information or rules on disclosures for contracting parties) may be necessary to avoid abusing influencers who do not have sufficient legal literacy or bargaining power.
- **Labor law:** To the extent that influencers are guided by talent agencies representing them, a discussion similar to that governing gig-workers may arise (e.g. Uber drivers as employees). This can be particularly relevant for child influencers as well. In France, the Labor Code was modified to better protect children in entertainment through new substantive and procedural rules.
- **Content regulation:** Platform governance frameworks must be updated to include the mandatory limits of freedom of contract arising out of fields of law such as consumer protection.

The members of this group are open to further elaborating on the points mentioned in this written evidence and welcome additional information requests. Please contact: Dr Catalina Goanta and/or Dr Christine Riefa.

Bibliography

1. **Books, chapters in books and academic articles**

- Abidin, C., Hansen, K. S., Hogsnes, M., Newlands, G., Nielsen, M. L., Nielsen, L. Y., & Sihvonen, T. (2020).** A review of formal and informal regulations in the Nordic influencer industry. *Nordic Journal of Media Studies.*, 2(1), 71-83.
- Arriagada, A., & Ibanez, F. (2020).** “You Need At Least One Picture Daily, if Not, You’re Dead”: Content Creators and Platform Evolution in the Social Media Ecology. *Social Media + Society*.
<https://doi.org/10.1177/2056305120944624>
- Bannigan, M. K., & Shane, B. (2019).** Towards truth in influencing: Risks and rewards of disclosing influencer marketing in the fashion industry. *New York Law School Law Review*, 64(3), 247-264.
- Bosher H., (2020)** Key Issues Around Copyright and Social Media: Ownership, Infringement and Liability 15(2) *JIPLP*, 123–133.
- Bosher H., (2020)** Legal Issues of Social Media and Influencer Marketing in Costello J. and Yesiloglu S. (eds) *Influencer Marketing: Concepts and Cases for Building Brand Communities and Engagement* (Routledge).
- Bosher H., and Yesiloglu S., (2018)** An Analysis of the Fundamental Tensions Between Copyright and Social Media: The Legal Implications of Sharing Images on Instagram *IRLCT*, 164-186.
- Bishop, S. (2019).** Managing visibility on YouTube through algorithmic gossip. *New Media & Society*, 21(11–12), 2589–2606. <https://doi.org/10.1177/1461444819854731>
- Bishop, S. (2020).** Algorithmic Experts: Selling Algorithmic Lore on YouTube. *Social Media + Society*, 6(1).
- Caplan, R., & Gillespie, T. (2020).** Tiered Governance and Demonetization: The Shifting Terms of Labor and Compensation in the Platform Economy. *Social Media + Society*, 6(2).
- Christin, A., & Lewis, R. (2021).** The Drama of Metrics: Status, Spectacle, and Resistance Among YouTube Drama Creators. *Social Media + Society*, 1-14.
- Lombana Bermudez, A., Cortesi, S., Fieseler, C., Gasser, U., Hasse, A., Newlands, G., & Wu, S. (2020).** Youth and the digital economy: Exploring youth practices, motivations, skills, pathways, and value creation. *Youth and Media*, Harvard University Berkman Klein Center for Internet & Society. Available at: <https://dash.harvard.edu/handle/1/42669835>
- De Cock Buning, M. (2020).** Life after the European Audiovisual Media Services Directive: social media influencers through the looking-glass. In Goanta, C. and Ranchordás, S. (eds.). *The Regulation of Social Media Influencers*. Edward Elgar.
- De Gregorio, G., & Goanta, C. (November 4, 2020)** The Influencer Republic: Monetizing Political Speech on Social Media. Available at SSRN: <https://ssrn.com/abstract=3725188>
- De Gregorio, g
- De Veirman, M., Hudders, L., & Nelson, M. R. (2019).** What Is Influencer Marketing and How Does It Target Children? A Review and Direction for Future Research. *Frontiers in Psychology*, 10. <https://doi.org/10.3389/fpsyg.2019.02685>
- Ducato, R. (2020).** One Hashtag to Rule Them All? Mandated Disclosures and Design Duties in Influencer Marketing Practices. In Goanta, C. and Ranchordás, S. (eds.). *The Regulation of Social Media Influencers*. Edward Elgar.
- Ershov, D., & Mitchell, M. (2020).** The Effects of Influencer Advertising Disclosure Regulations; Evidence From Instagram. In *Proceedings of the 21st ACM Conference on Economics and Computation (EC’20)*. Association for Computing Machinery, New York, NY, USA, 73-74.
- Fainmesser, I., & Galeotti, A. (2021).** The Market for Online Influence. *American Economic Journal: Microeconomics*, forthcoming.
- Goanta, C. (2021, March 29).** *Monetizing philanthropy: First findings*. Web Monetization Community. <https://community.webmonetization.org/philanthropy/monetizing-philanthropy-first-findings-3m4b>
- Goanta, C. & Ranchordás, S. (2020).** *The Regulation of Social Media Influencers*. Edward Elgar.
- Goanta, C. & Wildhaber, I. (2019).** In the Business of Influence: Contractual Practices and Social Media Content Monetisation. *Swiss Review of Business and Financial Market Law*, 4, 346-357.
- Kopf, S. (2020).** “Rewarding Good Creators”: Corporate Social Media Discourse on Monetization Schemes for Content Creators. *Social Media + Society*, 6(4). <https://doi.org/10.1177/2056305120969877>
- Leerssen, P. & Ausloos, J. & Zarouali, B. & Helberger, N. & de Vreese, C. H. (2019).** Platform ad archives: promises and pitfalls. *Internet Policy Review*, 8(4). <https://doi.org/10.14763/2019.4.1421>
- Leszczynska, M., & van Dijck, G. (2020).** Assessing the Methodological Quality of Empirical Research on Social Media Influencers. In Goanta, C. and Ranchordás, S. (eds.). *The Regulation of Social Media Influencers*. Edward Elgar.
- Liu, Y.-H., Ren, Y., & Dew, R. (2009).** Monetising user generated content using data mining techniques. *Proceedings of the Eighth Australasian Data Mining Conference*, 101, 75–81.

- Mathur, A., Narayanan, A., & Chetty, M.** (2018). Endorsements on Social Media: An Empirical Study of Affiliate Marketing Disclosures on YouTube and Pinterest. *Proceedings of the ACM on Human-Computer Interaction*, 2, <https://doi.org/10.1145/3274388>
- Micklitz, H. W.** (2014). Unfair Commercial Practices and Misleading Advertising. In Reich, N., Micklitz, H. W., Rott, P. and Tonner, K. (eds.), *European Consumer Law*. Intersentia.
- Mitchell, M.** (2020). Free Ad(vice). Internet Influencers and Disclosures Regulations. *RAND Journal of Economics*, forthcoming.
- Newlands, G., & Fieseler, C.** (2020). # dreamjob: navigating pathways to success as an aspiring Instagram influencer. In Goanta, C. and Ranchordás, S. (eds.). *The Regulation of Social Media Influencers*. Edward Elgar.
- Pavlopoulos, J., Malakasiotis, P., & Androutsopoulos, I.** (2017). Deeper Attention to Abusive User Content Moderation. *Proceedings of the 2017 Conference on Empirical Methods in Natural Language Processing*. <https://www.aclweb.org/anthology/D17-1117>.
- Perel, M., Elkin-Koren, N., & De Gregorio, G.** (February 10, 2021). Social Media as Contractual Networks: A Bottom Up Check On Content Moderation. Available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3797554
- Postigo, H.** (2016). The socio-technical architecture of digital labor: Converting play into YouTube money. *New Media & Society*, 18(2), 332-349.
- Riefa, Christine** (2019). Consumer Protection on Social Media Platforms: Tackling the Challenges of Social Commerce' in T. Synodinou, Ph. Jouglex, Ch. Markou., Th. Prastitou, *EU Internet Law in the Digital Era* Springer.
- Riefa, Christine** (2020) C. Riefa, Beyond e-commerce: some thoughts on regulating the disruptive effect of social (media) commerce (Além do comércio eletrônico: algumas reflexões sobre a regulação dos efeitos maléficos do comércio social (mídia)), *Revista de direito do consumidor RDC* (Brazil) 127 (Jan-Feb 2020), 281-304.
- Riefa, C., & Clausen, L.** (2019). Towards Fairness in Digital Influencers' Marketing Practices. *Journal of European Consumer and Market Law*, 8(2), 64-74.
- Roberts, A.** (2020). False Influencing. *Georgetown Law Journal*, 109(1), 81-139.
- Ranzini, G., Newlands, G. E., & Lutz, C.** (2020). Sharenting, Peer Influence, and Privacy Concerns: A Study on the Instagram-Sharing Behaviors of Parents in the United Kingdom. *Social Media+ Society*, 6(4), 2056305120978376.
- Roberts, A.** (2020). False Influencing. *Georgetown Law Journal*, 109(1), 81-139.
- Siciliani, P., Riefa, C. & Gamper, H.** (2019). *Consumer Theories of Harm: An Economic Approach to Consumer Law Enforcement and Policy Making*. Hart Publishing.
- Smit, C. R., Buijs, L., van Woudenberg, T. J., Bevelander, K. E., & Buijzen, M.** (2020). The Impact of Social Media Influencers on Children's Dietary Behaviors. *Frontiers in Psychology*, 10. <https://doi.org/10.3389/fpsyg.2019.02975>
- Susser, D., Roessler, B. & Nissenbaum, H.** (2019). Online Manipulation: Hidden Influences in a Digital World. *Georgetown Law Technology Review*, 4, 1-45.
- Tananbaum, A.** (1988). "New and Improved": Procedural Safeguards for Distinguishing Commercial from Noncommercial Speech. *Columbia Law Review*, 88(8), 1821-1848. <https://doi.org/10.2307/1122605>
- Wilson, E. J., & Sherrell, D. L.** (1993). Source effects in communication and persuasion research: a meta-analysis of effect size. *Journal of the Academy of Marketing Science*, 21, 101-112. <https://doi.org/10.1007/BF02894421>
- Witt, A., Suzor, N., & Huggins, A.** (2019). The rule of law on instagram: An evaluation of the moderation of images depicting women's bodies. *University of New South Wales Law Journal*, 42(2).
- Wojdowski, B. W., & Evans, N. J.** (2016). Going native: effects of disclosure position and language on the recognition and evaluation of online native advertising. *Journal of Advertising*. 45, 157-168. <https://doi.org/10.1080/00913367.2015.1115380>

2. News articles

- Alexander, J. (2021, January 26). *YouTube has paid more than \$30 billion to creators, artists, and others over the last three years*. The Verge. <https://www.theverge.com/2021/1/26/22249329/youtube-susan-wojcicki-letter-creators-monetization-transparency-policy-covid-misinformation>
- Bosher H., (2019) *Instagram Influencers: No, Having 30,000 Followers Does Not Make You a Celebrity*, The Conversation <https://theconversation.com/instagram-influencers-no-having-30-000-followers-does-not-make-you-a-celebrity-120686>

- Bosher H., (2018) *10 things you should know about Instagram Terms and Conditions*, The Conversation <https://theconversation.com/ten-things-you-should-know-about-instagrams-terms-of-use-102800>
- Broderick, R. (2018, November 23). *YouTubers Will Enter Politics, And The Ones Who Do Are Probably Going To Win*. BuzzFeed News. <https://www.buzzfeednews.com/article/ryanhatesthis/brazils-congressional-youtubers>
- DiResta, R. (2021, March 15). *Right-Wing Propagandists Were Doing Something Unique*. The Atlantic. <https://www.theatlantic.com/ideas/archive/2021/03/right-wing-propagandists-were-doing-something-unique/618267/>
- Lorenz, T. (2019, May 31). *The real difference between creators and influencers*. The Atlantic. <https://www.theatlantic.com/technology/archive/2019/05/how-creators-became-influencers/590725/>
- Martineau, P. (2019, December 4). *What's an Influencer? The Complete WIRED Guide*. Wired. <https://www.wired.com/story/what-is-an-influencer/>
- O'Neil-Hart, C., & Blumenstein, H. (2020, September 3). *Why YouTube stars are more influential than traditional celebrities*. Think with Google. <https://www.thinkwithgoogle.com/marketing-strategies/video/youtube-stars-influence/>
- Roose, K. (16 July 2019). *Don't Scoff at Influencers. They're taking over the World*. New York Times. <https://www.nytimes.com/2019/07/16/technology/vidcon-social-media-influencers.html> (accessed on 16 July 2019).
- Saldanha, N. (2019, November 19). *In 2018, an 8-year-old made \$22 million on YouTube. No wonder kids want to be influencers*. Fast Company. <https://www.fastcompany.com/90432765/why-do-kids-want-to-be-influencers>
- SignalFire's *Creator Economy Market Map*. (2020, November 29). SignalFire. <https://signalfire.com/blog/creator-economy/>
- Suciu, P. (2020, February 14). *Is Being A Social Media Influencer A Real Career?* Forbes. <https://www.forbes.com/sites/petersuciu/2020/02/14/is-being-a-social-media-influencer-a-real-career/>
- ThinkwithGoogle. (2014, September 3). *Blurred Lines Between Branded Video Content and Ads*. Think with Google. <https://www.thinkwithgoogle.com/marketing-strategies/video/youtube-insights-stats-data-trends-vol8/>
- Why popular YouTubers are building their own sites*. (2021, March 6). BBC News. <https://www.bbc.com/news/technology-55349255>

3. Policy documents

- Advertising Standards Authority. (2020). *Influencers' guide to making clear that ads are ads*. ASA | CAP. <https://www.asa.org.uk/resource/influencers-guide.html>
- CMA (2019) *Guidance: Social Media Endorsements: being transparent with your followers*, <https://www.gov.uk/government/publications/social-media-endorsements-guide-for-influencers>
- European Commission, *Behavioural Study on Advertising and Marketing Practices in Online Social Media (June 2018) Final Report*, https://ec.europa.eu/info/files/advertising-and-marketing-practices-online-social-media-final-report-2018_en
- Federal Trade Commission. (2019, November 5). *Disclosures 101: New FTC resources for social media influencers*. <https://www.ftc.gov/news-events/blogs/business-blog/2019/11/disclosures-101-new-ftc-resources-social-media-influencers>
- Stichting Reclame Code. (2020, December 10). *Advertising Code for Social Media & Influencer Marketing (RSM) 2019*. <https://www.reclamecode.nl/nrc/advertising-code-for-social-media-influencer-marketing-rsm-2019/?lang=en>
- UK Parliament. (2021). *DCMS Committee to examine the power of influencers - Committees - UK Parliament*. Digital, Culture, Media and Sport Committee. <https://committees.parliament.uk/work/1126/influencer-culture/news/153483/dcms-committee-to-examine-the-power-of-influencers/>

4. Other sources

- Amazon. (2021) *Amazon Influencer Program*. Amazon. <https://affiliate-program.amazon.com/influencers>
- Statista. (2021 February 12). *Global influencer marketing value 2016–2021*. <https://www.statista.com/statistics/1092819/global-influencer-market-size/>
- <https://news.mit.edu/2021/tik-tokking-all-about-science-malik-miles-george-0308>

