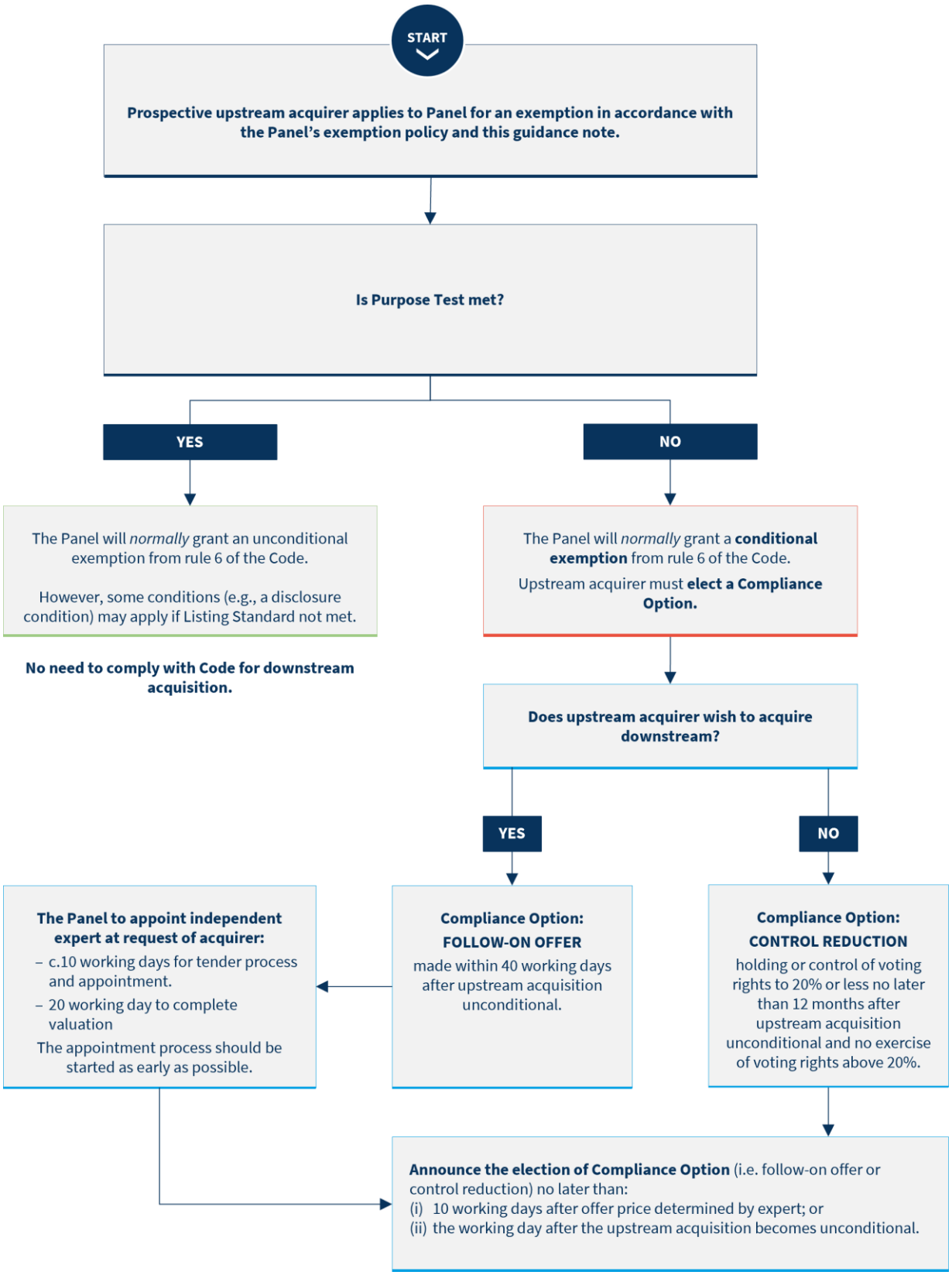APPENDIX A
THE PANEL'S UPSTREAM EXEMPTION POLICY