

Gainesville.

Citizen centered

People empowered

Keeping Our Neighborhoods Invested in Safe Housing Ordinance

**An update to Gainesville's Housing Ordinance -
Recommendations to address recurring issues
regarding rental properties in Gainesville**

**Proposed by Commissioner Adrian Hayes-Santos
May 10th, 2018**

Summary

The goal of this policy paper is to provide a starting point for the city commission to discuss solutions to the many rental housing issues in Gainesville. Effective rental policies at the local level will help increase the supply of affordable rental housing in Gainesville. While there are some large and long term solutions to affordable housing, the recommendations outlined here focus on quicker and cost effective solutions to the rental property issues in our community. The paper is separated into three different sections: Energy Efficiency Standards, Landlord Licenses, and Landlord/Tenant Issues. I want to thank Rachel Muller for her hard work in researching and helping with this policy paper.

Table of Contents

Energy Efficiency Standards	3
Landlord Licenses	8
Landlord-Tenant Issues.....	12

Part 1: Energy Efficiency Standards

Summary of the Issue

Many low-income renters face barriers to standards of living that homeowners in our city never need to consider. A study done by researchers at the University of Florida and the University of Central Florida to look at Florida Multifamily Efficiency Opportunities, found that, cost burdened households (those that make no more than 60% of the area's median income) paid more than 40% of their total income in housing expenses. More than three quarters of these low-income households live in multifamily rental units.

Over half of all multifamily rental units were built prior to 1980, before the first energy codes were enacted to Florida Law, making these units inherently less efficient. Cooling and hot water consumption are the largest portion of electricity consumption for multifamily rentals. Specifically, older rental units use about 5,000 gallons of water per month compared to 2,000 gallons of water in the newer units.[1]

Here in Gainesville there are plenty of opportunities for homeowners to make their properties more energy efficient. GRU offers free Home Surveys, as well as a Low-income Energy Efficiency Program designed to assist customers with home improvements that lower their electric bill and reduce energy usage. However, there are not any actions renters can take to improve the energy efficiency in their unit. Instead, they must go through their landlord for improvements.

GRU has conducted landlord focus group studies in the past and have found that landlords will only make improvements if appliances break or tenants complain about energy bills (many low-income tenants fear complaining). Landlords do not pay the energy bill and are unaware of the costs tenants pay. Further, landlords will only make improvements if they believe they will improve their bottom line. They find the rebate process confusing and too burdensome to make improvements to their units.

As wages continue to stay stagnant and rental prices continue to increase, it has become increasingly challenging for low-income renters to pay excessively high utility bills. Between the 2002 and 2013 the city commissions has worked on a energy efficiency ordinance but never fully executed an ordinance to provide for minimum energy efficiency in rental properties. The

necessity of this ordinance is still needed within the City of Gainesville and is why we are reproaching the city to reconsider this ordinance.

What is Energy Efficiency?

Energy Efficiency Requirements are requirements imposed with the purpose of maximizing the output per energy unit consumed. This would include insulation or structural elements of the structure such as, ceilings, walls, and doors, as well as equipment such as, air conditioning/heating systems and water heaters among others.[2]

Energy is considered a basic need in modern industrialized societies. Further, low income households bear a disproportionate share of the cost burden for utilities. These households tend to spend a greater percentage of their household income on energy expenses and face challenges like whether to spend money on food or energy. In addition to disproportionately burdening poor tenants, energy inefficiency is a contributor to environmental concerns.[3]

Specifically, low income household types have a median energy burden of 7.2% compare to a 2.3% median energy burden for non-low income household types.[4] When low income households and renters spend a larger proportion of their income on utility bills, they often face fears of losing electricity, water, and gas services. These practices enforce the cycle of poverty and cause mental and physical health problems.

Challenges that need to be addressed with Energy Efficiency Standards:

Split-Incentive Problem: Neither landlords nor tenants have sufficient incentive to invest time, money and effort to make improvements that are energy efficient.

Vacancy Rates: low vacancy rates force tenants to pay higher rent prices and to accept housing of inferior quality. With constrained supply, landlords are under little pressure to improve their properties' efficiency and renters become cautious asking for improvements in fear of retaliation.

Shaping landlord attitudes: three important variables to capture include building metering type – dictates impact of the split-incentive problem, size of the landlord's holding – landlords with significant holding have better access to capital and more interest in participating compared to those with less access, and finally investment time horizon – landlords that hold on to their buildings for longer times have higher interest than those seeking to increase property capital value.

Information barriers: the time it takes to search for information is discouraging for individuals to pursue energy efficiency. Landlords lack information and usually what they do know about energy efficiency is incorrect.

High transaction costs: difficulty in finding a good contractor, dealing with utility company, even having the work done is strenuous enough.

Case Studies

Wisconsin

The State of Wisconsin outlines minimum standards and procedures for energy efficiency across the whole state for rental units that was enacted in 1999. These standards include proper insulation, storm windows and doors, and moisture control. The Statute also outlines energy efficiency inspections and evaluations.[5]

Boston, MA

The City of Boston found that three quarters of Boston's emissions contributing to climate change were the result of energy use in buildings. To keep up with their Boston Climate Action Plan, the city adopted a building energy report and disclosure ordinance. This helps building owners, including residential, make cost effective energy efficiency investments. Each building subject to reporting is required to complete an energy assessment within five years of the first reporting and every five years subsequently.

Houston, TX

Created a provision for their construction code that would make any new permit applying for a residential permit to comply with an additional performance objective. New construction must meet a minimum 15 percent improvement in efficiency above the minimum provisions of the code.

Memphis, TN

The City of Memphis, in an effort to reduce electricity use per household as well as in an effort to help tenants of rental properties paying high utility bills updated their housing code to redefine "residential rental unit" to mean a rented or leased single-family residential building or a rented or leased residential dwelling unit within a single-family or multi-residential building. It also includes an amendment so that each rental unit has proper envelope, heating and cooling, plumbing, and all existing equipment should function according to manufactured standards. Finally, it includes an amendment for the city utility company to be able to perform inspections of units and charge a fee up to \$25 if the unit is not in accordance with the housing ordinance.

Cambridge, MA

Cambridge updated an ordinance entitled "Municipal Code of the City of Cambridge" to include a Building Energy Use Disclosure Ordinance. The purpose of this ordinance is to encourage efficient use of energy and to reduce the emissions of greenhouse gases. It requires owners of covered properties (including all residential) to measure and disclose energy usage and allows the city to collect energy usage data to enable more effective energy and climate protection planning. The ordinance also includes a provision that allows for amendments to the ordinance based on benchmark performances.

Local Analysis

As our knowledge of energy efficiency improves and as the quality of rental units diminishes in the City of Gainesville it has become apparent that Gainesville's Housing

Ordinance needs to be updated to protect renters and continue the City's efforts to become more sustainable.

The overall goal of COG's Housing Element is to: encourage a sufficient supply of adequate, decent, safe, sanitary, healthy, and affordable rental and owner-occupied housing for all income groups.[6] However, without a strong enforcement mechanism the quality of rental units has significantly decreased in recent years making housing for many of Gainesville's residents unsafe, unsanitary, unhealthy, and unaffordable.

Measures to improve energy efficiency will not only lower electricity use throughout the city but will also improve the safety of rental units. Within the last year, a renter was trapped inside his own home after a lit candle in another unit started a fire. The man in the unit attempted to escape but could not because his front door was equipped with a deadbolt lock. This is just one of many stories of unsafe conditions in rental units.

Earlier this year Mayor Poe wrote a leader to the editor "Making Gainesville a Complete Community". In the LTE, the Mayor discusses one of the ways to improve housing is through energy efficiency standards, especially in rental units.[7] Back in 2002, the City Commission recommended that GRU implement an energy efficiency program in multi-family complexes.

Implementing energy efficiency standards for rentals would be the most cost efficient and short term way to make housing in Gainesville more affordable.

Recommendations

The primary recommendation of this proposal is for the City Commission to reevaluate the legislative efforts made within the last 20 years to improve energy efficiency within the city and to pass an ordinance to provide for minimum energy efficiency in rental properties.

1. **Minimum Energy Efficiency Standards for Rental Units** - Continuing the efforts of previous commissions, the city of Gainesville should implement energy efficiency standards for rental units. Improving the energy efficiency of rental properties would have a huge impact in making lower income homes more affordable by lowering utility bills. Minimum energy efficiency standards should focus on upgrades that would reduce water and electrical consumption. As it may be difficult to retrofit older rental units, some flexibility may be needed in how the minimum standards are met for older units. There should also be grace period to allow landlords to upgrade the housing units to meet new energy efficiency standards. It is recommended that the commission to look at the City of Boulder's Rental Housing energy efficiency program for a starting point.
2. **Energy Efficiency Inspections** - To ensure that rental units meet city energy efficiency standards, it is recommended that rental units be inspected at the start of the energy efficiency program and at regular intervals (~5 years). New construction could be exempt for ~5 years from energy efficiency inspections as they would already met current building codes for energy efficiency. To manage program costs and to provide faster

service to landlords, private inspectors that have been approved by the city could be used for these inspections.

3. **Energy Efficiency Rating Program** - To improve the transparency of utility costs to renters, an Energy Efficiency Rating Program could be created. This program would be a quick and easy way for renters to understand the energy efficiency of a rental unit. To increase transparency, renters should be provided with the energy efficiency inspection report and rating by the landlord before a lease is signed. The rating should also be given to potential renters when a property is shown for a viewing to help with the renters housing decision. The rating and efficiency report for rental units should also be available on a city rental web portal for easy lookup for renters. Advertisements should also include the energy efficiency rating. An energy efficiency rating program will also incentivize landlords to upgrade their rental properties as the energy efficiency of a rental unit will now be part of a renters housing decision.
4. **Affordable Energy Efficient Rental Loan Program** - Gainesville continues to have a problem of not enough landlords accepting “Section 8” or other similar federal/state housing program applicants. To help increase the number of affordable rental properties available on the market and to help lessen the burden on landlords, it’s recommend the city look into a low-cost financial loan program for landlords to help pay for energy efficiency updates of rental units that meet city code. If a landlord accepts a loan from the city, then the landlord would have to accept renters who are having their rent subsidized by federal/state housing programs.

Part 2: Landlord Licenses

Summary of the Issue

The incentive of any business is to make as much profit as possible and the same is true for landlords. Landlords rent out properties in the hopes that it will provide them with a source of income. Just like businesses in Gainesville are regulated and require a license so should landlords. Without proper licensing, landlords have little incentive to keep properties up to code nor fix complaints made by tenants. Mandating that units are inspected protects tenants, neighborhoods, and the community at large.

Many landlords who do not keep their properties up to code rent to low income households. These households pay upwards of 50% of their income on housing and often live paycheck to paycheck. They accept living in subpar conditions because they feel as if they have nowhere to go. Many times, when these citizens do complain or attempt to make issues known to their landlord they are met with ignoring calls or threats of eviction. However, no member of our community should feel unsafe in their own home and minimum standards should be kept in all rental units to ensure this.

Renters have rights and deserve to be protected, just like in any other industry. The problem of code compliance is an issue faced by cities all around the United States and many cities are beginning to take the steps to ensure that the health, safety, and welfare of low income citizens are also met.

Importance of Landlord Licenses

Across the country, local governments are experiencing difficulties ensuring that rental housing is safe, properly operated and maintained. Local governments, thus have the responsibility to regulate property for the health, safety and welfare of their residents; not with the goal of punishing landlords, but rather to keep landlords responsible and heighten the quality of rental housing stock. The American Bar Association states that the culture of how we view renting as a type of residential use needs to be changed – instead rental properties need to be seen

as a business and like many other businesses that need to pass health and safety inspections, rental properties should be licensed to assure housing quality within the community.[8]

Under a licensing system, a rental property is not eligible for registration unless it follows key health and safety standards and allows for periodic re-inspection.[9] There are two main types of licensing programs:

1. **Universal Rental License:** All rental properties are treated equally under Universal Rental Licenses. That means all landlords would have to re-apply for a license, pay the associated fees, and undergo the same inspections.
2. **Target Rental License:** Properties are categorized based on code violations in order to differentiate between compliant and non-compliant property owners. Under Target Rental Licenses there are incentives to pay reduced licensing fees and undergo less frequent inspections.

Case Studies

Daytona Beach, FL

Last year the City of Daytona passed a Landlord’s Responsibilities and Tenants Rights Act, requiring Landlords to hold a City of Daytona Beach Rental Property License. As well as requiring inspections of properties every two years and placing an annual rental property license fee of \$90. This license allows tenants to expect: presentable and maintained exteriors, maintenance and repair of structures inside and outside the unit. [10]

Minneapolis, MN

Minneapolis uses a tiered rental license billing structure, starting at \$70 for 1-3 units in tier 1 and increasing up to \$175 for 16 or more units in tier 1. There are three tiers in this system, with a landlord falling under tier 3 paying a \$700 license fee for 16 or more units. Tiers are based on rental history and focuses on the condition and maintenance of the property. The ordinance was passed to promote health, safety, and welfare of the general public, maintain property values, eliminate substandard and deteriorating housing, as well as maintain a living environment that contributes to healthful individual and family living.[11]

Philadelphia, PA

In the City of Philadelphia, each and every property owned must have a rental license. The fee is \$50 per unit. Along with the license, landlords are required to provide tenants with a copy of the “City of Philadelphia Partners for Good Housing” brochure. The tenant must also be provided with a certificate of rental suitability, stating that properties have obtained all required licenses and do not have critical code violations. Finally, the Lead Paint and Disclosure Certification law requires landlords to ensure the property rented to families with children 6 years and younger that the property is lead safe.[12]

Boulder, CO

Starting this year, Boulder Colorado requires a \$105 application fee per single dwelling unit or per building for multi-unit buildings. In addition to the application fee, landlords face a \$50 fee if the property is not SmartRegs compliant. The city adopted this ordinance to preserve

public safety by establishing minimum standards for basic equipment and facilities associated with rental properties (including: lighting, ventilation and heating; fire safety amount of space for human occupancy; and safe and sanitary maintenance of dwellings). The SmartRegs ordinances requires all rental housing in Boulder to meet a basic energy efficiency standard by 2019.[13]

Local Analysis

In a 2018 report conducted by the University of Florida Bureau of Economic Business Research (BEBR) titled *Understanding Racial Inequality in Alachua County*, it was found that over 40% of all households within the Gainesville Core Based Statistical Area (CBSA) have at least one problem with the quality and condition of their housing. A CBSA is a geographical area that consists of one or more counties attached by an urban center of at least 10,000 with neighboring counties that are socioeconomically tied to the urban center. [14]

In 2017, three people were injured in Holly Heights neighborhood when a balcony collapsed. The tenants had all reported making complaints to the landlord and the reality company stated they did not even know the problems were so bad.[15]

Reporter, Bailey LeFever, covered *The High Cost of Renting* for tenants here in Gainesville. The report states “part of the problem is poorly maintained rental properties. Code Enforcement Division violation records for the past five years show a strong statistical relationship between these kinds of problems and the city’s lowest-value properties.” However, many renters never even place complaints against landlords out of fear of retaliation and losing an inexpensive place to live.[16]

Recommendations

It is recommended that the City of Gainesville consider implementing an ordinance that will update Sec.14.5-1 to include a targeted mandatory landlord license program for all rental housing units with a focus on Life and Safety issues

1. **Yearly Life-Safety Self Compliance Inspections** - All rental housing in the city would need to be self-inspected to ensure the life-safety of rental units. Landlords would self-inspect and report to the city that smoke detectors, carbon monoxide, and fire extinguishers are working and that the unit is safe for occupancy. The landlord would also need to self-report that the unit meets the city occupancy limits in single family zoned neighborhoods. It is recommended that the commission to look at the City of Boulder’s Rental Housing License program for a starting point.
2. **Targeted Mandatory Rental License** - The city should consider a targeted rental license program that covers all rental housing units in the city. Properties are categorized based on code violations in order to differentiate between compliant and non-compliant property owners. Under Target Rental Licenses there are incentives to pay reduced licensing fees and undergo less frequent inspections. With the expansion of the current landlord license program, the fees for a landlord license should be reduced.

3. **Minimum Housing Standards and Rental Unit Inspections** - To ensure that rental housing in Gainesville is safe and is at minimum basic quality level, the city should implement minimum housing standards and rental unit inspections.

The inspections would ensure that all rental housing in Gainesville meets a minimum standard that includes that the exterior and interior of buildings, lighting and ventilation is in safe working order. Occupancy limitations should also be a part of the inspection process. To incentivize landlords to keep rental units above the minimum housing quality standard, units that score highly would not be inspected as frequently. New construction could be exempt from inspections for a period of time as it would already meet building code. If a rental unit does not meet the minimum housing standards and the landlord does not make fixes to the property in a reasonable amount of time, the landlord would lose their landlord license for that property and not be able to rent the property until it was brought up to the city's minimum housing standard.

To manage program costs and to provide faster service to landlords, private inspectors that have been approved by the city could be used for these inspections. It is recommended that the commission to look at the City of Boulder's Rental Housing License program for a starting point.

Part 3: Landlord-Tenant Issues

Summary of the Issue

Often, tenants do not know what their rights are and enter agreements or have cases settled that are not in their favor. Many times, tenants face housing code violations but do not have the proper knowledge to know how to raise their defense in court against an attorney. Further, most court actions often result in hours of wasted time and excessive expenses on both parties that could easily be prevented. When looking at the statistics for Gainesville, over 18% of residents are below the poverty rate, 62.3% of residents rent homes, and 38% are rent burdened.[18] These three statistics are all higher than average for the State of Florida. In a city that has over half of the population renting and more than two-thirds considered rent burdened it is important that we use our unique situation to create a tangible solution that protects both landlords and tenants.

The Florida Bar provides an online pamphlet that allows both Tenants and Landlords to know their rights as equal parties under the law. However, many Landlords and Tenants alike do not know this service has been provided for them or cannot readily access a computer to understand their rights. That is why it is important that with every lease agreement a landlord should provide their tenants with both a Renter's Bill of Rights and a Welcome Packet that provides renters with the proper information on all the services provided in the community.

Case Studies

Washington, D.C.

The District of Columbia, as of 2014 began providing its residents with a "Tenants Bill of Rights". Landlords in the District are required to provide rental applicants with a copy of the TBR. The landlord must provide the TBR along with other disclosure documents that are also required under the Rental Housing Act.

New York City, NY

The City of New York has a department for Housing Preservation and Development (HPD) and under their jurisdiction they have provided for the residents a manual called the "ABCs of Housing". The guide provides information about owners' and tenants' rights and responsibilities, staying in your apartment safely, resources for new affordable housing or rental

assistance, and useful contact information for other housing related issues. As the HPD website states “Owners and tenants have legal responsibilities to each other. HPD is one of many city and state agencies that enforce those responsibilities. This booklet is designed to help owners and tenants gain an understanding of the rules and regulations affecting housing, and to provide information about how to receive assistance.”

Chicago, IL

The City of Chicago in partnership with tenant-landlord organization created a Rents Rights campaign to educate residents, 60% of which live in rental housing about the legal responsibilities and rights of both renters and property owners. Rents Right provides mediation for landlords and tenants to resolve disputes in an informal and non-adversarial manner.

Boulder, CO

Boulder provides its residents with an extensive handbook that outlines all the rights and responsibilities of both Landlords and Tenants. By providing this information it is meant to avert trouble before a lease is signed, during the duration of the lease, or upon termination of the lease. Along with the handbook, parties can use the City of Boulder Community Mediation Service. This a neutral third party service designed to assist in resolving disputes between landlord and tenants as well as roommates. The fee charged by these services is minimal but could even be waived for those with low income.

Santa Barbara, CA

Under the Housing and Human Services division of the City of Santa Barbara is program known as the Rental Housing Mediation Program (RHMP). The program has the purpose of resolving rental housing disputes by offering mediation services, and information on residential Landlord-tenant rights and responsibilities. The specific services provided include: mediation, information on rights and responsibilities, staff consultation, referral to social services agencies, and outreach and education. Santa Barbara has used this program since 1976 and is composed of a staff and board of 15 volunteers appointed by the city council.

Local Analysis

As a college town, many renters enter the Gainesville community not knowing much about the neighborhood they are moving into and the local laws that govern them. Even further, they do not know the rights and benefits they have living in this community. In order to be a landlord in the City of Gainesville, one must provide their tenants with a pamphlet prepared by the city containing guidelines for rentals in residential neighborhoods. The last time this pamphlet has been updated was in October of 2007 and often landlords do not even know that providing this pamphlet is one of their responsibilities to their tenants.

Recommendations

It is recommended to the City Commission to implement the following recommendations:

1. **Gainesville Mediation program** - To help provide a level playing for rental disputes and to find solutions to rental issues outside of the courts, it's recommended that the city of Gainesville create a rental mediation program. The Mediation Program would include all the proper resources for Landlords, Tenants, Roommates, Sublessors, etc.. to use during disputes. This will include:
 - Affordable access to a mediator staff over telephone
 - Affordable access to in person mediation conducted by a mediation panel
 - Education and outreach of landlord tenant laws that govern Florida and local city and county ordinances including a Renters Bill of Rights
 - Providing a Guideline for Rentals in a Residential Neighborhood that addresses the different services provided and how to handle neighborhood issues
 - Staff Consultation
 - Referrals to Social Service Agencies

 2. **Renters Bill of Rights and Welcome to Gainesville** - When a lease is signed a renters bill of rights should be provided to the tenant. This bill of rights would address in clear language the most common issues between renters/landlords and how renters can deal effectively with the issues. Also, with a highly transient population in Gainesville, it can be difficult for residents to know what amenities and services are available to them. A short welcome packet from the city given to renters, when they sign a lease, could be effective way to involve more residents in our community.

 3. **Student Community Relations Advisory Board Recommendations** - Study the recommendations from the board and implement recommendations that could improve tenant/landlord issues.

 4. **Landlord Training Program** - In cooperation with local partners, the city should look into hosting Landlord Training Programs to help educate landlords on city, state and federal rental unit housing programs and ordinances.

 5. **Occupancy Limits Disclosure** - Require that when a lease is signed that the renter must also sign that they will abide by the occupancy limits in the applicable zoning districts. Also, advertisements for applicable zoned rental units should also include a statement about occupancy limits.

 6. **Rental Unit Sample Lease** - It can be difficult for small landlords to know what to put into a lease. It's recommended the city provide a simple sample lease that meets city, state and federal housing laws.

 7. **Protecting against rental discrimination** - Look into having "income source" and "immigration status" as a protected classes under the city's human rights ordinance.
-

- [1] https://www.freshfromflorida.com/content/download/60388/1263496/MFEOpportunities_FinalReport_1-9-15.pdf
- [2] [050761_200609181730.pdf](https://www.freshfromflorida.com/content/download/60388/1263496/MFEOpportunities_FinalReport_1-9-15.pdf)
- [3] <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4819257/>
- [4] http://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden_0.pdf
- [5] <http://docs.legis.wisconsin.gov/code/register/1999/525b/insert/comm67.pdf>
- [6] http://www.cityofgainesville.org/Portals/0/plan/2014%20Web%20Update/HOUSING%20ELEMENT_Printable.pdf
- [7] <http://www.gainesville.com/opinion/20180209/lauren-poe-making-gainesville-complete-community>
- [8] <https://www.mayorsinnovation.org/images/uploads/pdf/BinderHotTopicsinLandUse4416.authcheckdam.pdf>
- [9] <http://www.communityprogress.net/tool-1---rental-registration-lincensing-pages-207.php>
- [10] http://beachsideneighborhoodwatch.org/docs/LANDLORD_RESPONSIBILITIES.pdf
- [11] <http://www.minneapolismn.gov/inspections/rental/index.htm>
- [12] <http://www.phila.gov/li/pages/tenantlandlord.aspx>
- [13] https://www-static.bouldercolorado.gov/docs/Rental_License_+_SmartRegs_Handbook_December_2017_FINAL2-1-201801051352.pdf?_ga=2.222504347.1047897288.1522944289-326979806.1518717900
- [14] https://www.bebr.ufl.edu/sites/default/files/Research%20Reports/ri1_baseline_report.pdf
- [15] <http://www.wcjb.com/content/news/Tenants-injured-after-balcony-collapsed-in-Holly-Heights-456479263.html>
- [16] <https://www.wuft.org/news/energy-burden/deficient-dwellings/high-costs-of-renting/>
- [17] <https://www.nytimes.com/2012/11/30/opinion/tipping-the-scales-in-housing-court.html>
- [18] <https://evictionlab.org/map/#/2016?geography=counties&bounds=-89.407,25.594,-78.096,32.235&locations=1225175,-82.343,29.681%2B12,-84.824,29.679%2B12001,-82.396,29.682>
- [19] <http://www.stetson.edu/law/lawreview/media/38-3hipler-pdf.pdf>