From: Michels, Tom
Sent: Wednesday, May 10, 2023 12:22 PM
To: Mould, David;Cooper, Michael;Matthews, Maria
CC: Kantakevich, Maura;Lynch, Dan;Slutsky, Max
Subject: RE: [EXTERNAL] Re: DCA Perimeter Rule Backgrounder
Attachments: DCA Perimeter Rule Background May 2023v7.docx

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David/Michael/Maria

Here is a revised version of our Virginia Backgrounder on the Perimeter Rule. You can expect further tweaks and changes as we move forward, but feel free to use/borrow as you see fit. Thank you!

Tom Michels
Director, Government Affairs

United | 815 Connecticut Ave. NW, Suite 500 | Washington, DC | 20006

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From: Mould, David <David.Mould@MWAA.com>
Sent: Tuesday, May 9, 2023 5:45 PM
To: Michels, Tom ████████████████████
Subject: [EXTERNAL] Re: DCA Perimeter Rule Backgrounder

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Tom,
    Many thanks and great to see you also. Look forward to working with you on this one.

Thanks,
David

Sent from my iPhone

> On May 9, 2023, at 5:37 PM, Michels, Tom ████████████████████████ wrote:
>
> CAUTION: This email originated from outside of Airports Authority. Do not click links or open attachments unless you recognize the sender and have verified the authenticity of the message.
> David,
>
> Great to see you today. Attached is the backgrounder we threw together for the Governor. We are developing much more but would be grateful to see whatever message points you are using. Thanks so much!
>
>
> **Tom Michels**

Director, Government Affairs

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Please Oppose Any Changes to the DCA Perimeter Rule

History
Since 1986, the Metropolitan Washington Airports Authority (MWAA) has managed Reagan National and Dulles International Airports as a single system with the two airports having complementary roles. When Congress created MWAA, it mandated that Reagan National have a limited number of flights and a perimeter beyond which flights could not fly. This was intended to maintain a stable level of activity at the smaller and geographically-limited Reagan National, ensure access for smaller east coast communities, and allow Dulles to grow into a long-haul, international hub.

Unfortunately, 13 years after Congress delegated management authority of this complex system to the professional oversight of MWAA, it began to reinsert itself in direct system management by poking holes in the perimeter it had set – often by adding long-haul flights found desirable by individual members of Congress. The changes to the DCA perimeter rule that were made between 1999 and 2012 had a significant negative impact on the economic viability of Dulles Airport as traffic shifted back to Reagan National.

Thankfully, the Commonwealth of Virginia has made significant investments in Dulles and Northern Virginia, including infrastructure (e.g., the Silver Line) and the political support needed from local, state, and federal political leaders in defense of the perimeter rule.

We respectfully request that our Virginia leaders continue to support Dulles, the numerous airlines that operate there, and the major corporate headquarters and local businesses that all work together as part of a vibrant Northern Virginia region by asking Congress to *__leave the existing perimeter rule in place without any new exceptions__*.

The Negative Impact of Expanding Beyond the Perimeter
In three separate FAA reauthorization bills passed between 1999 and 2012, Congress created 20 exemptions to the perimeter rule resulting in flights from DCA to 10 cities outside the perimeter. These exemptions have shifted over **7,000 flights per year and over 1 million passengers from Dulles to Reagan National,** disrupting the balance between the two airports and straining capacity for people and planes at Reagan National.
- Since the 2012 FAA reauthorization, the number of beyond the perimeter seats out of Reagan National **has nearly doubled.**
- Between 2005 and 2019, the number of domestic passengers at Dulles **declined by 28%.**
- As of today, the total number of Reagan National passengers is now **14% greater** than those at Dulles, including international travelers.

The rise in traffic at Reagan National and the decline in traffic at Dulles is directly attributable to exemptions to the perimeter rule. The loss of traffic from Dulles is financially destabilizing to the airport and is harmful not only to the Northern Virginia regional economy but to Virginia's smaller airports – all of which are highly dependent on their linkages to a world-class airport.

An unstable Dulles directly undermines the substantial investments made over many years by the Commonwealth of Virginia in both direct and indirect infrastructure in support of Dulles as well as the substantial investment of private sector partners such as United Airlines in a stable and vibrant airport. Dulles is home to one of United Airlines' seven U.S. hubs and United is planning to make additional investments in the airport based, in part, on an expectation that MWAA's management of its system will not continue to be undermined by Congress.

Additional Issues with New Exceptions to the Existing Perimeter Rule

- **Small Communities:** The current perimeter rule ensures many smaller markets in the eastern U.S. continue to have non-stop air service to the nation's capital and the global air network. Changes to the perimeter rule would give airlines a strong economic incentive to substitute more profitable long-haul service to large markets at the expense of cities with current short-haul service. Smaller communities that rely on air service to Reagan National and Dulles for economic development and connections to global travel and trade would be harmed the most by changes to the perimeter rule. Reductions to smaller community service inside the perimeter (as well as larger communities outside the perimeter with existing service from Dulles) have resulted from previous changes to the perimeter rule at Reagan National.

- **Reagan National Limitations:** Reagan National is at capacity on both the land and air side. Additional flights and passengers would create further congestion and aggravation in Virginia communities such as Alexandria and Arlington, longer lines, and longer delays at Reagan. Additionally, Reagan National cannot accommodate wide body aircraft, so any long-haul flights from Reagan are limited to narrow body aircraft only.

- **Local Control:** Congress expressly delegated operational control of Washington Reagan and Dulles to the Metropolitan Washington Airports Authority (MWAA). Just like any other airport authority in the country, MWAA (with a Board of Directors with shared accountability to VA, DC, MD and the federal government) is best positioned to balance the interests of local residents and travelers alike to optimize air travel opportunities, economic development and local concerns such as noise and congestion . Legislators should not put a finger on the scale and substitute narrow personal travel interests over the determinations of the locally-based authority. No airport authority in the country could operate effectively with such intervention.

United's Presence in Virginia

- United currently employs more than 7,200 people in Virginia. In 2022, United hired more than 2000 people in Virginia and plans to hire another 1,100 in 2023 and beyond. This hiring surge is driven both by a strategy of using Dulles as a major north-south connecting hub as well as by the United Next plan to purchase up to 470 new aircraft over the next five years across the country.

- United's posture today is a turnaround from 8 years ago when costs to operate at Dulles were skyrocketing. The combination of the state's $50M investment to lower costs at Dulles and MWAA's disciplined leadership have turned things around. Now, Dulles and Northern Virginia businesses work together to create economic opportunity, growth, and jobs.

- As of March 2023, United operates 211 peak day departures to 110 destinations from Dulles (expected to grow to more than 350 daily departures in the next few years). Over the past two years, United has launched several new international routes, including Accra, Athens, Amman, Berlin, Lagos, and Cape Town.

- In addition to Dulles and National, United serves four other Commonwealth airports: Richmond, Norfolk, Roanoke, and Charlottesville.

- Thanks to a grant from the Infrastructure Investment and Jobs Act (Bipartisan Infrastructure Law) United is working with MWAA to build gates planned for delivery in Summer 2026. The "Tier 2 East" concourse will be built off the current C-train station and will have the ability to flex between 14 narrowbody and 7 widebody gates. Tier 2 East provides a starting point for further expansion (i.e., Terminal C/D replacement.) Securing additional Federal infrastructure funds will be a key factor for the long-term solution.

# # #

From: Michels, Tom
Sent: Wednesday, May 10, 2023 3:40 PM
To: Cooper, Michael
Subject: FW: [EXTERNAL] MWAA Slot/Perimeter Language
Attachments: Perimeter Rule 2023 - FINAL.pdf; DCA Perimeter tlk pts May 2023.docx; Perimeter points May 2023.docx

Tom Michels
Director, Government Affairs

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From: Matthews, Maria <Maria.Matthews@MWAA.com>
Sent: Wednesday, May 10, 2023 2:43 PM
To: Michels, Tom █████████████████████; Fariello, Theresa ███████████████████████
Cc: Mould, David <David.Mould@MWAA.com>; Westerlund, Chryssa <Chryssa.Westerlund@MWAA.com>; Morrissey, Steve ████████████████████>; Kantakevich, Maura ████████████████████████
Subject: [EXTERNAL] MWAA Slot/Perimeter Language

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

Hi Tom and Theresa,

It was great to meet you at yesterday's meeting.

As promised, we wanted to share some of the documents we have pulled together preliminarily on the slot/perimeter rules. I have attached the following items:

1. A one-pager that hits the fundamental high points of this topic.
2. A generic set of talking points
3. A long-form narrative detailing the history and impact of any slot and/or perimeter adjustments.

Items #2 and #3, provided in Word, are works in progress. We are revising and refining each of them as we continue our internal conversations. We welcome your feedback on all of the documents shared and look forward to collaborating with you as the debate continues to unfold.

Maria D. Matthews, CAE
Federal Government Affairs Program Manager

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METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

Preserve Reagan National Airport Slot & Perimeter Rule

Members of Congress have historically used the FAA Reauthorization cycle to relax, or create new exemptions to, the statutory perimeter around Reagan National Airport. A few Members of Congress from districts outside the perimeter are once again pushing for new perimeter exemptions, which cause operational and financial problems for Reagan National and Dulles airports. These efforts are currently supported by a coalition of outside the perimeter businesses led by Delta Air Lines.

What are Slots?	What is the Perimeter?
Slots are permits granted by the Federal Aviation Administration (FAA) to take off or land at an airport. A round-trip flight requires one slot to arrive and one to depart (a "slot pair"). The slot system manages congestion by controlling the frequency of takeoffs and landings and assures safety. Slots are issued to airlines and can then be traded among airlines under FAA guidance.	The **perimeter** is a 1,250-mile radius from Washington, D.C., beyond which nonstop flights to/from DCA are prohibited without a federally granted exception. It limits DCA to shorter flights and smaller aircraft while managing congestion and limiting jet noise in surrounding residential areas. Originally set at 650 miles, the perimeter has been expanded by congressional and regulatory actions. In addition, Congress has legislated 20 daily, beyond-perimeter round trip exceptions.

Protect Inside-Perimeter Air Service and the D.C. Regional Economy

The long-standing slot and perimeter regulatory structure assures the efficient and economical operation of the Metropolitan Washington Airport Authority's two-airport system serving Washington, D.C. In addition to managing congestion and assuring passenger safety, the Perimeter Rule is essential for maintaining the operational and financial balance between the small, space-constrained, and over-crowded Reagan National (DCA) and the much-larger Dulles International (IAD), which is equipped to handle bigger planes and longer flights and designed to be the region's growth airport.

Despite DCA's flight limitations, the D.C. region is well served by IAD, which has no flight restrictions. For passenger convenience, Dulles is served by a special access highway and by the Metrorail public transit system. Additionally, Washington is served by the nearby Baltimore airport, which also has no flight restrictions.

Protect DCA's continued air service to smaller cities, customer-service quality, growth of travel options for the region and the future growth of the National Capital Region's economy by preserving the DCA Slot/Perimeter Rule as it currently exists. Politicians and corporations from other parts of the country should not dictate how the D.C. region's airports operate.

Impact of Relaxing Perimeter Rule

Perimeter exemptions enable airlines to shift long-distance flights from Dulles (IAD), or other airports, to DCA. This adds to DCA's overcrowded conditions and strains its limited facilities. When flights shift away from Dulles, it raises costs for IAD's airlines and passengers and upsets the operational and financial balance of the DCA-IAD airport system, eroding the airports' contribution to the regional economy.

The migration of flights was a key driver of a situation in 2014, when IAD's costs to airlines rose to the highest in the nation, prompting airlines to reduce service or leave IAD entirely. This, in turn, discouraged new airlines – especially international carriers that need domestic connections for their transfer passengers – from serving IAD.

Because DCA operates at capacity during most daytime hours, existing inside-perimeter destinations could be converted to more-profitable beyond-perimeter destinations to accommodate new exemptions. As a result, smaller inside-perimeter cities – including some state capitals – would risk losing their nonstop air connection to DCA.

Recovering From Prior Perimeter Relaxation

To address the economic dilemma caused by the migration of flights from IAD to DCA, the Metropolitan Washington Airports Authority restored balance to the two-airport system through innovations to cut operational expenses, increase non-airline revenue and support airline profitability. Over a five-year period this helped Dulles recover and begin growing again. Should new perimeter exemptions trigger a return to 2014 conditions at Dulles, these initiatives, now in place, cannot be repeated to restore the balance. This would be an economic blow to the National Capital Region's economy and its status as a global gateway for air travel.

If Your Destination is in Red
You are at Risk!

● **At Risk Service**

DCA Perimeter Rule – Key Points

- The Reagan National (DCA) Slot/Perimeter Rule is the long-standing regulatory structure that keeps Washington's two-airport system in operational and financial balance. The Perimeter limits nonstop flights at DCA to 1,250 miles from Washington, unless the government has granted an exception.

- Concerns arising from the introduction of jet aircraft in the 1960s prompted the FAA to introduce the rules to manage congestion and noise at DCA because of its single and relatively short main runway, limited land area and proximity to densely populated communities. Dulles International Airport (IAD) was built to accommodate larger planes and longer-distance flights that would come with the growth of commercial air travel.

- The rules keep airport operations within DCA's limitations by directing most larger planes, and longer flights, to IAD's four long runways and room to grow (Dulles covers 12,000 acres compared with 733 acres at DCA).

- Balancing the two-airport system keeps both airports financially stable, prevents overcrowding and over-stressing of DCA's infrastructure, optimizes the use of DCA and IAD and protects the major airport investments made by the Metropolitan Washington Airports Authority, the airlines and the federal government. It also supports the airport's major contribution to the regional economy (supporting 187,000 jobs, $14 billion in regional GDP, and $1.1 billion in state/local tax revenue).

- The Slot/Perimeter Rule has worked well in keeping the two-airport system in balance to best serve the traveling public in the National Capital Region. Periodically, however, Congress has legislated exemptions to the Perimeter, enabling long-distance flights to move from IAD to DCA, upsetting the balance by causing overcrowding at DCA and stressing its limited facilities while escalating costs to airlines and passengers at IAD.

- Because DCA operates at capacity during most daytime hours, existing inside-perimeter destinations could be converted to more-profitable beyond-perimeter destinations to accommodate new exemptions. As a result, smaller inside-perimeter cities – including some state capitals – would risk losing their nonstop air connection to DCA.

- Perimeter exemptions contributed to a situation in 2014 when a migration of flights gave DCA more passengers than IAD. The resulting higher costs at IAD were driving away airlines and air service endangering the airport system's economic contribution. The Airports Authority initiated innovations including cost management, pursuit of additional non-airline revenue and a plan for the airports to share some revenue to help ease IAD's costs. It took over five years to reverse the negative trends and get the IAD growing again.

- Those seeking new Perimeter exemptions would imperil the stability of the two-airport system. Re-creating the 2014 situation would reverse the new growth at IAD. Because the innovations that solved the 2014 problem are already in place, no additional remedies would be available to fix the problem this time.

- Those seeking new Perimeter exemptions imply that outside-perimeter cities would have no access to Washington without nonstop flights from their airports to DCA. This is a false assertion, because the region's two other major airports – Dulles and Baltimore – can serve any destination with no restrictions. Members of Congress from areas outside the Washington region should not dictate how Washington's airports are managed.

THREATS TO DCA PERIMETER – MAY 2023

The Washington, D.C., region is served by a two-airport system owned by the federal government: Ronald Reagan Washington National, located next to downtown Washington, and Washington Dulles International, 26 miles to the west. The oldest airport, Reagan National (DCA) opened in 1941 on an 800-acre island in the Potomac River. It served the city's needs well until the early 1960s, when the arrival of jet aircraft and the rapid expansion of commercial aviation made it too small to serve the region into the future. In addition, DCA is surrounded by densely populated communities whose residents are disturbed by noisy jet traffic.

To accommodate the region's growth, Dulles International Airport (IAD) opened in 1962. Dulles has many important advantages. It's 12,000 acres and multiple long runways can handle many more flights, many more passengers and much larger airplanes than the smaller DCA, which has only one relatively short main runway (and two even-shorter crosswind runways – one of which is now restricted by a new high-rise building in its flight path) and tightly constrained space for planes and passengers.

To manage the increasing congestion and noise, and to ensure air safety, the DCA slot and perimeter rules were established by agreement of the airlines serving DCA in 1966. The slot rule initially limited the number of takeoffs and landings per hour to manage congestion and safety concerns. The perimeter rule limited nonstop routes to 650 miles from DCA to keep the larger and louder jets at IAD, which had the facilities to accommodate them and was not near noise-sensitive residential areas. The Federal Aviation Administration later, in 1969, promulgated the High Density Rule, imposing operating restrictions (slots) at DCA and other congested airports. The Perimeter Rule was formally implemented in regulations a decade later and eventually codified in the Washington National Airports Transfer Act of 1986, which also established the Metropolitan Washington Airports Authority to operate DCA and IAD on the government's behalf.

By design, Dulles became the region's growth airport, serving international and long-haul domestic flights. The Reagan-Dulles system, managed since the 1980s by the Metropolitan Washington Airports Authority, serves the National Capital Region well, providing about 40,000 jobs at the airports and supporting more than 187,000 jobs across the region, providing over $1 billion in state and local tax revenue, and generating $23.6 billion in economic output, including $14.4 billion in annual GDP with $9 billion in spending by visitors who fly to the region *(according to independent study of 2017 data)*.

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Because of the difference in size and capabilities of the two airports, it is important to their continued operational efficiency, financial health and regional economic contribution to keep them in balance. The DCA slot and perimeter rules are instrumental in maintaining that balance and optimizing the usefulness and economic benefits of these essential transportation assets. When Congress has modified these requirements to increase the number or length of operations in past years – by adding slots or relaxing the perimeter – it has upset the balance of the system and caused problems at both airports.

Adding slots during the busy daytime hours, when the airport is already operating at capacity, could impact safety by increasing congestion in DCA's already-congested airspace. In addition, expanding the perimeter, or legislating exceptions to it, allows airlines to move flights from IAD to the closer-in DCA, which causes overcrowding and flight delays and strains the airport's limited facilities – such as terminal areas, security checkpoints, baggage-handling systems, parking lots and roadways.

This migration of flights and passengers also causes problems at Dulles, because having fewer flights and passengers increases costs to airlines (and, therefore, ticket prices) and the increased cost discourage airlines from adding or expanding service. When flights move away from Dulles, its international airlines -- which need domestic connections for their passengers from abroad – can cut or cancel service or move to other airports, further escalating IAD's costs and reducing travel options for local customers. It also diminishes the airport's contribution to the regional economy.

Federal action through the years has resulted in expansion of the perimeter from its original 650 miles to the current 1,250 miles. Additionally, Congress has legislated exceptions – 20 daily round trips are currently allowed to cities outside the perimeter (including Los Angeles, San Francisco, Denver, Phoenix, Austin, Portland, Las Vegas, San Juan and Salt Lake City).

These congressional modifications to the perimeter were key contributors to a challenging situation in 2014 when the migration of flights from Dulles to the smaller Reagan National resulted in dangerous and costly overcrowding at DCA, additional noise for its surrounding communities, and rising costs for Dulles, which prompted airlines – especially international airlines – to move even more flights to less-costly airports outside the Washington region. The high cost at Dulles caused its main carrier, United Airlines, to consider reducing or eliminating its IAD hub operation, which would have been detrimental to the traveling public and Washington's regional economy.

To repair the financial and operational damage caused by this situation, the Metropolitan Washington Airports Authority launched several major initiatives including:

- Establishing a Revenue Office to pursue additional non-airline revenue to help offset the soaring cost to IAD's airlines and passengers,
- Forging stronger partnerships with airlines to help them optimize their efficiency and profitability at IAD,
- Launching a new Airline Business Development function to aggressively recruit new airlines and destinations,
- Crafting an agreement among airlines at both airports to share some of DCA's growing revenue with IAD to help bring operational costs back into balance,
- Initiating additional cost controls and tighter budgets, and
- Selling a large tract of IAD's unused land to create a fund that can be used to address temporary cost escalations.

These efforts, through much work and innovation over more than five years, helped bring IAD's cost per enplaned passenger (a key metric for airlines in deciding which airports to serve) from among the highest in the nation in 2014 to a competitive level in 2019. This, in turn, has attracted new airlines, destinations and passengers to Dulles (and the return of lost business), restoring its standing in the increasingly competitive airport market.

But this success is now threatened by renewed attempts by some in Congress to legislate additional exceptions to the DCA perimeter through provisions in the Federal Aviation Administration Reauthorization bill currently under consideration. Further relaxation of the perimeter would re-create the problems of 2014. But the initiatives that successfully addressed the situation in 2014 are now in place, and additional innovations are not available if the two-airport system is thrown out of balance again.

Enacting legislation that expands or makes further exceptions to the perimeter would again create difficulties that threaten the financial and operational viability of the system that serves the air transportation needs of the National Capital Region. Those challenges include:

- **Loss of air service to smaller markets**: Because DCA is at capacity, any new beyond-perimeter flights would come at the expense of existing flights. So smaller destinations inside the perimeter would be replaced by larger and more-profitable beyond-perimeter destinations. These smaller inside-perimeter destinations include many state capitals.

- **More noise around DCA**: Planes to more-distant destinations are generally larger than those to destinations within the perimeter. They use more fuel and are heavier – and, therefore, louder – than the smaller aircraft serving inside-perimeter destinations. Longer-distance flights also tend to arrive and depart in early morning and late-evening hours, the most problematic times for aircraft noise disturbance.

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- **Higher costs at Dulles**: Migration of flights and passengers away from Dulles would increase its per-passenger cost, resulting in higher ticket prices and fewer travel options for customers.

- **Loss of service at Dulles**: Higher costs at Dulles would prompt airlines to move flights to other airports, depriving travelers in the National Capital Region of air-service options – especially if a reduction in domestic connections prompts international airports to move their flights to other airports with more abundant domestic flight choices. Relaxation of the perimeter also could allow flights from countries with U.S. Customs pre-clearance (such as Shannon, Dublin, Abu Dhabi and some Caribbean and Canadian points) to land at DCA with smaller aircraft.

- **Overcrowding and loss of customer convenience at DCA**: In the late 1990s, DCA and its facilities were designed to handle about 15 million passengers per year. But the migration of flights from Dulles contributed to annual passenger loads at DCA approaching 24 million a year. This surge in passengers beyond the airport's capacity was a key driver of Project Journey, which added a concourse and new security facilities to accommodate the growth. But DCA's limited runway capacity, with no room to grow, will not allow the airport to become any larger. So DCA's reputation for efficiency and close-in convenience would be diminished. Additionally, roadways on and around the airport are already at capacity (in addition to parking facilities) before additional flights add even more cars.

- **Stress on DCA infrastructure**: Adding additional long-distance flights at DCA, with larger and heavier planes, would result in greater stress on runways and terminal facilities, including ticketing and seating areas, restrooms, screening areas and baggage-handling systems. An increase in flights would require construction of additional gates and new fuel-storage infrastructure within DCA's already limited footprint to accommodate bigger planes flying longer distances.

- **Environmental impacts**: Adding more long-distance flights at DCA could create adverse environmental impacts. These flights would require more de-icing chemicals, which must be kept out of nearby waterways, in colder weather. Larger planes on the airfield, and potentially more planes flying in holding patterns during high-congestion times, would produce more greenhouse gases and other emissions, potentially impacting air and water quality for the airport and surrounding communities.

- **Impact on BWI**: Allowing more beyond-perimeter flights would encourage airlines to move flights from Baltimore to DCA, which many customers near Washington would find more convenient.

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- **Impact on the National Capital Region's economy**: A loss of flights and passengers at IAD – especially the loss or reduction of United Airlines' Dulles hub operation – would significantly diminish the two-airport system's economic contribution to the region. The IAD workforce, currently numbering about 23,000, and the 100,000 other jobs airport operations support, would shrink – along with the number of tourists and other visitors who spend billions of dollars while in the region.

It is important to note that despite DCA's flight limitations, Washington is well served by IAD, which has no flight restrictions. Dulles is served by a special access highway and by the Metrorail public transit system. Additionally, Washington can be served by the nearby Baltimore airport, which also has no flight restrictions.

For these reasons, the Metropolitan Washington Airports Authority strongly opposes any further action by Congress or regulatory agencies to further weaken the DCA slot and perimeter rules beyond their current status. We are grateful for the understanding and support of IAD and DCA's largest airlines (American and United) and solid bipartisan support from our regional congressional delegation, and the support of other business partners, the region's state and local governments and business groups in opposing any proposed modifications in the FAA Reauthorization Bill or any other legislation under consideration in Congress. The quality and stability of the National Capital Region's two-airport system, the transportation services it provides and its significant contribution to the regional economy are at stake.