# ON THE SHIFT FROM DEFINED BENEFIT TO 

## DEFINED CONTRIBUTION PENSION PLANS

By<br>Ms. I. M. Kasalu<br>REG NO: I40/P/8195/05

A Research Project Submitted in Partial fulfillment of the requirement for the award of the Post Graduate Diploma in Actuarial Science in the School of Mathematics, University of Nairobi

Supervisor;
Prof. R. O. Simwa

I here by declare that this research project is my original work and has not been presented in any learning institution for academic award or otherwise.

Signature $\qquad$
Kasalu Irene Muthoni
This research work has been submitted for examination with my approval as the university supervisor

Signature.

$$
22 \mid 1!120.12
$$

Prof. R. O. Simba

## ACKNOLEDGEMENT

It is with this great pleasure that I convene the most profound gratitude to the following good people, who without their assistance and cooperation this piece of work could not have been made possible

Mrs. Angeline K. Kasalu my mother and a great friend you have made me whom I am by taking me to school. Your enormous support in almost every aspect of my life is the answer to my success. May God bless you for being such a wonderful Mother.
My beloved husband Dr. Benjamin M. Mang'ara and lovely sons Joshi and Dani. You have all given me a new meaning in life, am very greatful for yuor understanding and encouragement to carry on with this research work.

Prof. J A.M Otieno, Prof. Ongana, Mr. A. Achola lecturers and men of great wisdom and knowledge. You have natured my brain and I would like to record my appreciation for your academic or otherwise support.

Prof. Richard Simwa, lecturer and my supervisor. I am grateful for the helpful Discussions that we held out of your busy schedule, your encouragement made my work possible.

Prof. Patrick Weke, lecturer. I am sincerely thankful for the enormous and priceless assistance that have received from you not forgetting that you where always there, when we needed you most. In summary you are a good lecturer and a good person.

## ACRONYM

| $D B-$ | Defined Benefit |
| :--- | :--- |
| $D C-$ | Defined contribution |
| $P V-$ | Present Value |
| $F V-$ | Future Value |
| $a_{n}-1-$ | Present Value of an annuity |
| $V-$ | Discounting Factor |
| P.a - | Per Annum |


#### Abstract

Traditional DB pension plans are gradually losing their dominance in Kenya like many other occupational pension systems of many countries. Over the past few decades there has been a gradual shift towards DC pensions and, in some countries, DC plans now account for the majority of invested assets in private sector occupational pension plans. The most frequently quoted reasons are: Cost control, in the sense that an employer's obligation to a DC plan can be predicted up front, based on the contribution formula used, easier administration for DC plans, and difficulty in communicating the benefits provided by a DB plan. While all these are legitimate reasons, they are all reasons from an employer's perspective. Traditionally, the employer makes all decisions concerning retirement benefit arrangements. The ultimate choice of benefits often reflects the interest of the employer, even though Employee Retirement Income Security Act and the Pension Benefits Acts stress that retirement plans are solely for the benefit of the employees.

DB and DC plans have significantly different characteristics with respect to their cost and the benefits offered to the employees. How well they succeed must be judged in the context of their cost effectiveness and the benefit they provide to the employee. In this paper, we intend to approach the subject from both the perspective of the employee and employer welfare. We shall focus on the cost involved in DB Plan and DC Plan. We will then also compare the values of benefits they will provide to an employee.


Table of contents
Title ..... i
Declaration ..... ii
Acknowledgment ..... iii
Acronym ..... iv
Abstract ..... v
Chapter 1
1.0 Introduction ..... 1
1.1 Background ..... 1
1.2 Research objectives ..... 2
1.3 Research Hypothesis ..... 2
Chapter 2
2.0 Literature Review
2.1 DC plans ..... 3
2.2 Db plans ..... 5
2.2.1 Flat dollar Plans ..... 6
2.2.2 Career Average pay plans ..... 6
2.2.3 Final Average Pay Plan ..... 7
Chapter 3
3.0 Methodology, Application and Results ..... 8
3.1 Model Assumptions ..... 8
3.2 Modeling the cost of DB Plan and DC Plan ..... 10
3.2.1 A model of DB plans ..... 10
3.2.2 A model of DC plans ..... 11
3.3 A Comparison of DB and DC plans ..... 13
Chapter 4
Summary of results and conclusions ..... 15
References ..... 16
Appendix ..... 17
Appendix II ..... 18

## Chapter 1

### 1.0 INTRODUCTION

### 1.1Background

Although employer pension programs vary in design they are usually classified into two broad types: defined contribution and defined benefit. Under a defined contribution (DC) plan each employee has an account into which the employer and, if it is a contributory plan, the employee make regular Contributions. Benefit levels depend on the total contributions and investment earnings of the accumulation in the account. Often the employee has some choice regarding the type of assets in which his accumulation is invested and can easily find out what its value is at any point in his working career. Defined contribution plans are in effect tax deferred savings accounts in trust for the employees, and are by definition fully funded.

In a defined benefit (DB) plan the employee's pension benefit entitlement is determined by a formula which takes into account years of service for the employer and, in most cases, wage or salary.

### 1.1 Objectives

DB and DC plans have significantly different characteristics with respect to their cost and the benefits offered to the employees. How well they succeed must be judged in the context of their cost effectiveness and the benefit they provide to the employee. In this paper, we intend to approach the subject from both the perspective of the employee and employer welfare. We shall focus on the cost involved in the arrangements as a percentage of the payroll. We will then also compare the values of benefits they will provide to an employee.

### 1.2 Research Hypothesis

Our research hypothesis is that DB plan is more cost effective and for a given level of contribution the DB Plan can yield better benefits than a DC Plan.

## Chapter 2

### 2.0 LITRATURE REVIEW

### 2.1 Defined Contribution Plans

The DC arrangement is the conceptually simpler retirement plan. According to Scott(1999), The employer, and sometimes also the employee, make regular contributions Into the employee's retirement account. The contributions are usually specified as a predetermined fraction of salary, although that fraction need not be constant over the course of a career.

Contributions from both parties are tax deductible, and investment income accrues tax free. Often the employee is given a choice as to how his account is to be invested. In principle, contributions may be Invested in any security, although In practice most plans limit investment options to various bond, stock and money market funds. At retirement, the employee either receives a lump sum or an annuity, the size of which depends upon the accumulated value of the funds in the retirement account. The investment risk and investment rewards are assumed by each individual/employee/retiree and not by the Sponsor/employer, and these risks may be substantial (Cannon Ian -2012) The employee thus bears all of the investment risk; the retirement account is by definition fully funded, and the firm has no obligation beyond making its periodic contributions.

Valuation of the DC plan is straightforward: simply measure the market value of the assets held in the retirement account. However, as a guide for personal financial planning, the DC plan sponsor often provides workers with the indicated size of a life annuity starting at retirement age that could be purchased now with the accumulation in their account under different scenarios. The actual size of the retirement annuity will of course, depend upon the realized investment performance of the retirement fund, the interest rate at retirement, and the ultimate wage path of the employee.

Examples of DC plans include United States Individual Retirement Accounts (IRAs) and $401(\mathrm{k})$ plans, the UK's personal pensions and proposed National Employment Savings Trust (NEST), Germany's Riester plans, Australia's Superannuation system and New Zealand's KiwiSaver scheme. Individual pension savings plans also exist in Austria, Czech Republic, Denmark, Greece, Finland, Ireland, Netherlands, Slovenia and Spain (Economic Policy Committee and the European Commission -2006)

### 2.2 Defined $B$ enefit $P \mid a n s$

According to Scott (1999), a traditional defined benefit (DB) plan is a pension plan in which the benefit on retirement is determined by a set formula, rather than depending on investment returns. In the US the internal revenue code (1939) specifies a defined benefit plan to be any pension plan that is not a defined contribution plan (see above) where a defined contribution plan is any plan with individual accounts. These retirement plans are sponsored by the employers. For each year of service, the employer promises to provide a definite benefit to the employee, which commences upon the employee's retirement, and continues as long as he/she lives. The plan usually also provides some ancillary benefits such as early retirement subsidies, death, disability, and termination benefits. It may also provide cost of living increases for benefits after retirement. There are different types of DBs. However, the benefits are all designed to reflect the economic environment at the retirement age. The amount of retirement benefits is intended to replace a certain percentage of earnings immediately before retirement. The three major types of DB plans are:

### 2.2.1 Flat Dollar Plans

These plans provide a fixed amount of retirement benefits for each year of service. The benefit rate reflects the current economic situation only (Micheal - 2009). Thus, nominally, the benefit is not tied to the situation at retirement. However, through union negotiations or otherwise, the benefit rates are continually updated to the new economic situations. Consequently, the final retirement benefits are related to the situation at retirement.

### 2.2.2 Career Average Pay Plans

These plans provide retirement benefits each year based on the pay for that year (Micheal - 2009). Again, nominally these plans do not fully reflect the economic situation at retirement. However these plans usually get career average updates at regular intervals. At each update, benefits for all past service are increased to reflect pay close to the date of the update. However, if the career average pay plan is never updated, the retirement benefits provided by the plan will be inadequate.

### 2.2.3 Final Average Pay Plan

The majority of non-union plans are final average pay plans. Each year the participant earns retirement benefits which reflect pay close to the retirement date (Micheal - 2009). The retirement benefits provided by such plans are explicitly tied to the economic conditions at the retirement age, unlike the implicit schemes of the other types of DB plans.

Consider an hypothetical employee who starts working at age 25 with an initial pay of $\$ 40,000$. The DB pension plan provides a benefit of $1.5 \%$ of final pay for each year of service. Normal retirement age is 65 . If the employee stays with the same employer throughout entire career and his/her pay increase at $5.5 \%$ each year, the pay increases from $\$ 40,000$ at age 25 to $\$ 323,000$ before retirement, and the retirement benefit accumulates to $\$ 194,000$ at retirement.

## Chapter 3

### 3.0 METHODOLOGY, APPLICATION AND RESULTS

### 3.1 Model Assumption

Our model is based on a hypothetical newly-hired female aged 30 on the starting date of her employment with an initial pay of $\$ 1,5400$. She continues working until age 60.

Thus, the length of the career is 30 years.
We make the following assumptions;

- She dies at the age of 80 years
- She never marries
- Her salary increases at the rate of $4 \%$ p.a
- We define investment returns to be $8 \%$ net of fees.
- We shall use the final average pay plan as the representative of DB plans providing a benefit of $1.5 \%$ of final pay for each year of service.
- The DC Plan provides a lump sum benefit which our employee splits to equal 30 annual amounts.

By their final year of work, her salary has reached $\$ 50,000$, having grown by about 4\% percent each year as shown below.
$F V=\left((1+i)^{n}\right)^{* P V}$

Where:

- $F V=$ Future Value ( Final salary after 30 years)
- PV $=$ Present Value ( Starting Salary)
- $\mathrm{i}=$ Ratc of salary increase
- $\mathrm{n}=$ number of periods ( 30 years)

Next, we define a target retirement benefit that, combined
with Social Security benefits, will allow her to achieve generally accepted standards of retirement adequacy. The plan provides a benefit in retirement equal to $\$ 26,684$ per year or $\$ 2,224$ per month. A cost of living adjustment is provided to ensure the benefit maintains its purchasing power during retirement. Thus, the nurse will receive a benefit equal to $53 \%$ of her final year's salary that adjusts with inflation, which we estimate at $2.8 \%$ per year. With this benefit and Social Security benefits, each nurse can expect to receive roughly $83 \%$ of her pre-retirement income - a level of retirement income that can be considered adequate, but not extravagant.

### 3.2 Modeling the cost of DB Plan and DC Plan

### 3.2.1 A model of DB Plans

Then, on the basis of all these inputs, we calculate the contribution that will be required to fund our target retirement benefit through the DB plan over the course of her career. We calculate as shown below the amount required at age 60 that would be required to be set aside for the our employee, to provide a modest
retirement benefit of about $\$ 2,224$ per month cost to fund the target
retirement benclit under the DB Plan is about $\$ 272,000$.
$a_{n^{-}} \mid=\left(1-v^{n}\right) / i$
There fore,

$$
\text { PVOrdiriary Arirititg }=C *\left[\frac{1-(1+i)^{-n}}{i}\right]
$$

Where;
$C=\$ 2,224$
$\mathrm{i}=1.08^{1 / 12}-1=0.00643403$
$\mathrm{n}=12 \times 20$

We express this amount as a level percent of payroll over a career (Appendix 1). We get it is $10 \%$ of payroll each year as shown figure 1 .

### 3.2.2 A model of DC Plans

Modeling the cost of the target retirement benefit in the DC plan requires some adjustments based on what we know about how DC plans differ from DB plans. First, because employees are not provided with an annuity benefit at retirement under the DC plan, we determine the size of the lump sum amount that an individual would need to accumulate by their retirement date in order to fund a retirement benefit equivalent to that provided by the DB plan (including inflation adjustments).

We calculate as shown below the amount required at age 60 that would be required to be set aside for our employee to provide a modest retirement benefit of about $\$ 2,224$ per month cost to fund the target retirement benefit under the D( Plan is about $\$ 534,000$

## Monthly retirement benefit $\times 12 \times 20$

We then calculate the contribution that will be required
to fund this benefit through the DC plan over the course of a career, and express this as a level percent of payroll (Appendix I). We find that the cost to fund the target retirement Benefit, smoothed over a career, comes to $19.6 \%$ of payroll each year as shown ligure 1 .

Figure 1 Showing Amount Required at Age 60 to be set aside for our employee for each type of Plan to provide a benefit of $\$ \mathbf{2 , 2 0 0}$ per month; as a $\%$ of Payroll


From figure1 we found that to achieve roughly the same target retirement benefit that will replace $53 \%$ of final salary, the DB plan will require contributions equal to $10 \%$ of payroll, whereas the DC plan will require contributions to be almost twice as high - $19.6 \%$ of payroll

### 3.3 A Comparison of DB and DC plans Benefits

Let us now compare the values of yearly benefits provided by the DB and the DC plans for the same sample employee. A DB plan which provides $1.5 \%$ final pay for each year of service is compared to a DC plans which provide annual contribution rates of $10 \%$ and $19.6 \%$ respectively. We use investment returns of $8 \%$ p.a and $12 \%$ p.a.

The Value of benefit under DC Plan is calculated as follows and is shown in Appendix II;
$\sum_{n=0}{ }^{30} 1,540(1.04)^{n}(r / 100)(1+i / 100)^{30-n}$

Where; $r$ is the contribution rate at $10 \%$ and $19.6 \%$ $i$ is the investment returns rate of $8 \%$ p.a and $12 \%$ p.a We find that at retirement the amount of benefit under DC plan which provide annual contribution rates of $10 \%$ and $19.6 \%$ is approximately $\$ 273,000$ and $\$ 535,200$ respectively which translate to a yearly benefit of \$ 13,650 and \$ 26,760 respectively as shown in figure 2 .

Figure 2 Showing Yearly Values of benefits; DB Plan Vs DC Plan


Form figure 2 we find that for our employee to receive the same yearly benefit as in DB Plan the DC Plan will have a high contribution rate of $19.6 \%$ when the investment return is $8 \%$ or offer a contribution rate of $10 \%$ when the investment return is $12 \%$.

## Chapter 4

## Conclusion and Recommendations

In our analysis on the cost to provide our employee with a target monthly benefit of $\$ 2,200$, we find that DB plans are more cost-effective than DC plans.

Our findings show that a DB plan can provide the same level of retirement income for our employee at almost half the cost of a DC plan.

We also found that for a DC Plan to provide the same benefit as a DB Plan it has to offer a high contribution rate or ensure its investment returns are high.

Hence, the shift from DB plans to DC Plans would not be beneficial to our employee and her employer as the former is more cost effective and can yield better returns.

## References

1. Cannon, Edmund; Ian Tonks (2012). "The Value and Risk of Defined Contribution Pension Schemes: International Evidence". Journal of Risk and Insurance.
2. Chirchir, Salome (2010) "Conversion of DB schemes to DC" http://www.rba.go.ke/publications/research-papers/category/2-research-reports-2009-2010?download=4\%3Aconversion-of-defined-benefits-schemes-to-defined-contributions-schemes
3. Economic Policy Committee and the European Commission (2006). The impact of ageing on public expenditure. EU.
4. Micheal, Sze (2009) " DB vsDC, which is better to the participants?" http://www.szeassociates.com/dbvsdc.html
5. Scott, W.F. (1999) Life Insurance Mathematics
6. US Internal Revenue Code of 1939, Title 26 Section 414
http://www.law.cornell.edu/uscode/text/26/414

## Appendix I

|  |  | DB 1.5\% Final |
| ---: | ---: | ---: |
| Period end | salary | Pay |
| 1 | 16016 | 240.24 |
| 2 | 16656.64 | 499.6992 |
| 3 | 17322.91 | 779.530752 |
| 4 | 18015.82 | 1080.949309 |
| 5 | 18736.45 | 1405.234102 |
| 6 | 19485.91 | 1753.73216 |
| 7 | 20265.35 | 2127.861687 |
| 8 | 21075.96 | 2529.115605 |
| 9 | 21919 | 2959.065258 |
| 10 | 22795.76 | 3419.364298 |
| 11 | 23707.59 | 3911.752757 |
| 12 | 24655.9 | 4438.06131 |
| 13 | 25642.13 | 5000.215742 |
| 14 | 26667.82 | 5600.241632 |
| 15 | 27734.53 | 6240.269247 |
| 16 | 28843.91 | 6922.538684 |
| 17 | 29997.67 | 7649.405246 |
| 18 | 31197.57 | 8423.345071 |
| 19 | 32445.48 | 9246.961033 |
| 20 | 33743.3 | 10122.98892 |
| 21 | 35093.03 | 11054.3039 |
| 22 | 36496.75 | 12043.9273 |
| 23 | 37956.62 | 13095.03368 |
| 24 | 39474.88 | 14210.95829 |
| 25 | 41053.88 | 15395.20481 |
| 26 | 42696.03 | 16651.45353 |
| 27 | 44403.88 | 17983.56981 |
| 28 | 46180.03 | 19395.61307 |
| 29 | 48027.23 | 20891.84608 |
| 30 | 49948.32 | 22476.74474 |


| Contribution r $10 \%$ | $\begin{aligned} & \text { Benefit i } \\ & 8 \% \end{aligned}$ | Contribution r 19.6\% | Benefit i 8\% |
| :---: | :---: | :---: | :---: |
| 1601.6 | 14922.54748 | 3139.136 | 29248.1931 |
| 1665.664 | 14369.86053 | 3264.70144 | 28164.9266 |
| 1732.29056 | 13837.64348 | 3395.289498 | 27121.7812 |
| 1801.582182 | 13325.13816 | 3531.101078 | 26117.2708 |
| 1873.64547 | 12831.61453 | 3672.345121 | 25149.9645 |
| 1948.591288 | 12356.36954 | 3819.238925 | 24218.4843 |
| 2026.53494 | 11898.72623 | 3972.008482 | 23321.5034 |
| 2107.596338 | 11458.03266 | 4130.888822 | 22457.744 |
| 2191.900191 | 11033.66108 | 4296.124375 | 21625.9757 |
| 2279.576199 | 10625.00697 | 4467.96935 | 20825.0137 |
| 2370.759247 | 10231.48819 | 4646.688124 | 20053.7169 |
| 2465.589617 | 9852.544185 | 4832.555649 | 19310.9866 |
| 2564.213201 | 9487.635141 | 5025.857874 | 18595.7649 |
| 2666.781729 | 9136.241247 | 5226.892189 | 17907.0328 |
| 2773.452998 | 8797.861941 | 5435.967877 | 17243.8094 |
| 2884.391118 | 8472.015203 | 5653.406592 | 16605.1498 |
| 2999.766763 | 8158.236862 | 5879.542856 | 15990.1442 |
| 3119.757434 | 7856.079941 | 6114.72457 | 15397.9167 |
| 3244.547731 | 7565.114017 | 6359.313553 | 14827.6235 |
| 3374.32964 | 7284.924609 | 6613.686095 | 14278.4522 |
| 3509.302826 | 7015.112587 | 6878.233539 | 13749.6207 |
| 3649.674939 | 6755.293602 | 7153.36288 | 13240.3755 |
| 3795.661936 | 6505.097543 | 7439.497395 | 12749.9912 |
| 3947.488414 | 6264.168004 | 7737.077291 | 12277.7693 |
| 4105.38795 | 6032.161782 | 8046.560383 | 11823.0371 |
| 4269.603469 | 5808.748382 | 8368.422798 | 11385.1468 |
| 4440.387607 | 5593.609554 | 8703.15971 | 10963.4747 |
| 4618.003112 | 5386.438829 | 9051.286099 | 10557.4201 |
| 4802.723236 | 5186.941095 | 9413.337543 | 10166.4045 |
| 4994.832165 | 4994.832165 | 9789.871044 | 9789.8710 |


| Period end |  | $\begin{aligned} & \text { Contribution r } \\ & 10 \% \end{aligned}$ | Appendix II |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Benefit i | Benefit i 12\% | $\begin{aligned} & \text { Contribution r } \\ & 19.6 \% \end{aligned}$ | Benefit i <br> 8\% |
|  | salary 16016 | 10\% 1601.6 | 8\% 14922.54748 | $42842.68863$ | 19.6\% 3139.136 | 29248.15 |
| 2 | 16656.64 | 1665.664 | 14369.86053 | 39782.49659 | 3264.70144 | 28164.9 |
| 3 | 17322.91 | 1732.29056 | 13837.64348 | 36940.88969 | 3395.289498 | 27121.78 |
| 4 | 18015.82 | 1801.582182 | 13325.13816 | 34302.25471 | 3531.101078 | 26117.2 |
| 5 | 18736.45 | 1873.64547 | 12831.61453 | 31852.09366 | 3672.345121 | 25149.9 |
| 6 | 19485.91 | 1948.591288 | 12356.36954 | 29576.94411 | 3819.238925 | 218 |
| 7 | 20265.35 | 2026.53494 | 11898.72623 | 27464.30525 | 3972.008482 | 23321.5 |
| 8 | 21075.96 | 2107.596338 | 11458.03266 | 25502.56916 | 4130.888822 | 2457. |
| 9 | 21919 | 2191.900191 | 11033.66108 | 23680.95708 | 4296.124375 | 1625.9 |
| 10 | 22795.76 | 2279.576199 | 10625.00697 | 21989.46014 | 4467.96935 | 0825.0 |
| 11 | 23707.59 | 2370.759247 | 10231.48819 | 20418.78442 | 4646.688124 | 20053.7 |
| 12 | 24655.9 | 2465.589617 | 9852.544185 | 18960.29982 | 4832.555649 | 19310.9 |
| 13 | 25642.13 | 2564.213201 | 9487.635141 | 17605.99269 | 5025.857874 | 859 |
| 14 | 26667.82 | 2666.781729 | 9136.241247 | 16348.42178 | 5226.892189 | 907 |
| 15 | 27734.53 | 2773.452998 | 8797.861941 | 15180.67737 | 5435.967877 | 3.8 |
| 16 | 28843.91 | 2884.391118 | 8472.015203 | 14096.34327 | 5653.406592 | 16605.1 |
| 17 | 29997.67 | 2999.766763 | 8158.236862 | 13089.46161 | 5879.542856 | 15990.1 |
| 18 | 31197.57 | 3119.757434 | 7856.079941 | 12154.50006 | 6114.72457 | 15397.9 |
| 19 | 32445.48 | 3244.547731 | 7565.114017 | 11286.32149 | 6359.313553 | 14827.8 |
| 20 | 33743.3 | 3374.32964 | 7284.924609 | 10480.15567 | 6613.686095 | 14278.4 |
| 21 | 35093.03 | 3509.302826 | 7015.112587 | 9731.57312 | 6878.233539 | 13749. |
| 22 | 36496.75 | 3649.674939 | 6755.293602 | 9036.460754 | 7153.36288 | 13240 . |
| 23 | 37956.62 | 3795.661936 | 6505.097543 | 8390.999272 | 7439.497395 | 2749 |
| 24 | 39474.88 | 3947.488414 | 6264.168004 | 7791.642181 | 7737.07729 1 | 12277. |
| 25 | 41053.88 | 4105.38795 | 6032.161782 | 7235.096311 | 8046.560383 | 11823. |
| 26 | 42696.03 | 4269.603469 | 5808.748382 | 6718.303717 | 8368.422798 | 138 |
| 27 | 44403.88 | 4440.387607 | 5593.609554 | 6238.42488 | 8703.1597 入 | 963.1 |
| 28 | 46180.03 | 4618.003112 | 5386.438829 | 5792.823103 | 9051.28609 ¢ | 557. |
| 29 | 48027.23 | 4802.723236 | 5186.941095 | 5379.050024 | 9413.337543 | 0166 |
| 30 | 49948.32 | 4994.832165 | 4994.832165 | 4994.832165 | 9789.87104 A | 9789.8 |

