

Shared Special User Facility for  
Innovation & Entrepreneurship  
(SSUFIE)  
Pilot Program  
Review

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**2019 July 15**

## **Introduction**

The Shared Special User Facility for Innovation & Entrepreneurship (SSUFIE) pilot program enables early-stage startups that are affiliated with UC Berkeley (UCB) to conduct commercial R&D in UCB faculty labs - under rigorous oversight. For an overview of the SSUFIE program (including a checklist of questions and corresponding approvals), go to [ipira.berkeley.edu/ssufie](http://ipira.berkeley.edu/ssufie).

Enabling a startup to share the specialized R&D capabilities of a professor's lab can be pivotal to launching the company (as documented in this review's survey results). However, allowing commercial R&D in US university research labs under faculty management is radical – and for good reasons. This for-profit activity introduces numerous issues for the university. The SSUFIE program enables this startup capability while addressing numerous issues including (but not limited to):

- Maintaining oversight of campus facilities;
- Prioritizing research and education over commercial use;
- Ensuring compliance with environmental, health and safety standards as well as insurance and visitor best practices;
- Preserving the university's non-profit tax status;
- Managing conflicts of interest related to potential misuse of university personnel and facilities for private gain;
- Establishing appropriate IP rights;
- Determining fair market value fees, indirect cost overhead, and allocation of funds; and
- Addressing public and government perception (especially for a public university).

UCOP and UCB approved the SSUFIE program in July 2017 for a 2-year pilot period. Now that the pilot is coming to an end, the objective of this review is to recommend whether the program should continue; and if continued, then explore ways to improve the program.

The core data for this review is a written survey of the SSUFIE program's constituents: SSUFIE entrepreneurs (e.g. startup founders and CEOs) and UCB faculty who have participated in the program. Exhibit A is an unedited collation of the survey results.

## **Status**

Here are general metrics for the SSUFIE program covering the approximate 2-year period ending 2019 June 15:

- 47 startups inquired about the program;
- 12 startups implemented the program in 12 different faculty labs;
- 2 SSUFIE startups graduated after 1-year, and 2 are pursuing 1-year renewals (and the remainder are still in their initial 1-year term);
- At least 8 SSUFIE startups (67%) have an active IP rights agreement with UCB;
- About 25 Visiting Entrepreneurial Fellows (VEFs) came to the campus under the program (averaging about 2 VEFs per SSUFIE);
- About \$0.5 million in aggregate revenue will be invoiced to the 12 startups during their 1-year terms (averaging about \$4K per month per startup), and reinvested back into UCB research;
- No SSUFIE inventions were disclosed to UCB (but 1 disclosure is expected in a few months from GenEdit in the Murthy BioE lab);

The program currently has 5 startup applications in its pipeline. For details on SSUFIE inquiries, applications, and implementations, go to [tinyurl.com/ssufie-tracking-sheet](http://tinyurl.com/ssufie-tracking-sheet).

## Recommendations

The SSUFIE survey results overwhelming indicate that the SSUFIE program provides a unique and valued capability that fosters: (1) UCB startups, (2) the commercialization of (licensed) technology developed at UCB, (3) the UCB innovation & entrepreneurship ecosystem, and (4) the mission of the university.

Furthermore, the SSUFIE program has been a catalyst for maturing UCB's perspective on how to manage the activities of startups on the campus. This maturation includes augmented risk management as well as improved transparency and corresponding oversight of the use of UCB facilities by startups.

Based on the results summarized above, this report recommends the continuation of the SSUFIE program – but with the following conditions: (1) Each SSUFIE implementation continues to require comprehensive review and approval (because it's inherently an anomalous campus activity); and (2) The SSUFIE program continues to be surgically used only for special (and time-limited) opportunities such that the amount of SSUFIE activity remains a small fraction of the total amount of research and education activity at the university. Note that from a risk-management perspective, approval to continue the SSUFIE program merely means that we will continue to consider the capability on a case by case basis, because: (a) each new SSUFIE is individually approved, and (b) UCB can immediately terminate any (and all) active SSUFIEs with or without cause. Therefore, we can halt the program at practically any time.

## Other Considerations

From its onset, the SSUFIE program has been undergoing periodic refinements (e.g. the establishment of a template for SSUFIE COI management plans). In addition to the overall recommendation to continue the SSUFIE program, this review provides the opportunity for the campus to consider the following 8 aspects of the program:

### 1) Streamlining the Application and Approval Processes:

Some survey results indicate that the SSUFIE application and approval process is straightforward and reasonable; other feedback indicates that the process seemed complicated and slow. Some of the complications could be attributed to getting the first few SSUFIEs approved – especially approval for COI and animal use. Also, some of the slowness could be attributed to that fact that this program is adding workload to UCB staff without adding commensurate work capacity.

Currently, after the completion of a SSUFIE application (and SSUFIE COI form), it typically takes about 2-3 weeks to get the 5-8 approvals (PI, chair, dean/VCR, SACI, Capital Projects + EH&S, COI, CARSA). The longest steps in the process are reviews and management plans for COI and CARSA because they involve committees that meet monthly.

While there are ongoing incremental opportunities to streamline the SSUFIE application and approval process, the reality of the situation is that each SSUFIE should have a rigorous review and approval process in order to ensure that the university is maintaining oversight of this atypical activity on the campus.

### 2) Finance and Accounting Administration:

The finance and accounting (F&A) administration of the SSUFIE program has been challenging. At the time of this report, CGA is rejecting responsibility for SSUFIE F&A (because a SSUFIE isn't sponsored research). Furthermore, some departments have wanted to administer the F&A for SSUFIEs in their departments – but that has had mixed results (such as difficulty invoicing some SSUFIEs).

The VCRO is exploring a UCB guidance document that would rationalize putting SSUFIE F&A under CGA. An alternate approach (albeit a hack) is to have IPIRA do the F&A (note that IPIRA already has responsibility for aspects of licensee F&A, such as payment compliance).

### **3) Fair Market Value (FMV) Fee Determination:**

FMV fee determination is among the most laborious steps of the SSUFIE application process – especially for the use of equipment that is custom-built (and consequently doesn't have comparable commercial pricing).

In comparison to FMV determination for an IP rights license agreement, the FMV determination for a SSUFIE agreement is more objective (especially when comparable commercial pricing is available). Nonetheless, there is frequently some leeway in the FMV determination; and while UCB doesn't want to gouge startups, we want to ensure that this program isn't merely a cheap way for startups to use university resources. As a result, we can't expect all startups to be 100% delighted with their SSUFIE FMV fees.

### **4) Indirect Cost Overhead:**

During its pilot phase, the SSUFIE program applied 20% IDC overhead to the SSUFIE fees. We might want to increase the rate to around 30%. Furthermore, it's not clear that IDC is getting distributed to the offices that administer the SSUFIE program. Therefore, as an alternative (or in addition) to increasing the IDC rate, we could consider adding separate surcharges for SSUFIEs that require a review, approval and management plan from EH&S, COI, and CARSA (as well as IPIRA).

### **5) Individual SSUFIE Renewals Beyond Initial 1-Year Term:**

Now that the SSUFIE program is 2 years old, individual SSUFIEs have been coming to the end of their 1-year initial terms. To date, 2 SSUFIE startups have graduated, and 2 are requesting 1-year renewals.

Out of an abundance of caution and oversight, SSUFIE renewals are being put through the full review and approval process. However, we should consider lowering / streamlining the approvals for the 1-year renewal process, and also consider what should be the maximum duration of a SSUFIE (e.g. 2 or 3 years). Note that if many individual SSUFIEs extend beyond their initial 1-year term, then it's likely that within a year, we'll have double the number (~24) of active SSUFIEs on the campus.

### **6) More than 1 SSUFIE Startup in a Lab Under the Same PI:**

As of the date of this report, two faculty labs (Murthy and Dueber) inquired about having a second SSUFIE startup in their lab overlapping with the current SSUFIE startup in their lab (resulting in 2 startups concurrently in the same lab under the same PI). We should consider what is the maximum number of SSUFIEs in a single lab space (and correspondingly, when does a lab effectively become a startup incubator). The answer might depend on the size of the lab, and the activities of the multiple startups in the lab.

### **7) Allow UCB GSRs and Postdocs to Also be VEFs under a SSUFIE:**

One of the most common reasons for startups that inquired about a SSUFIE, but didn't pursue the program is that some startups wanted their VEFs to be people who were also concurrently employed by UCB as GSRs or postdocs. Currently, we don't allow this situation due to potential conflicts of employment, and IP agreement (i.e. the SSUFIE VEF IP agreement is different from the UC employee IP agreement). However, we could explore ways to manage those conflicts and allow this situation.

### **8) IP Rights:**

Several startups that inquired about a SSUFIE, objected to the (non-negotiable) IP joint-ownership provisions of the program. Some of those objections were due to ignorance about the details, and subsequently resolved. This review doesn't recommend changing the IP terms.

## Exhibit A

Exhibit A is an unedited collation of the SSUFIE survey results from SSUFIE constituents: (a) SSUFIE lab PIs, and (b) SSUFIE startup founding CEOs / Visiting Entrepreneurial Fellows (VEFs). The collation is organized in alphabetic order by the startup company's names.

This exhibit also includes the unedited feedback from a co-chair of the UCB campus Conflict of Interest Committee.

For more information about each SSUFIE, go to [tinyurl.com/ssufie-tracking-sheet](http://tinyurl.com/ssufie-tracking-sheet).

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## BioInspira in BioE under Prof John Chris Anderson

Location: Donner 261

Notes: This SSUFIE was atypical in that it uses a lab room dedicated to the startup (not shared space and equipment).

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Feedback from SSUFIE lab PI: Prof John Chris Anderson

----- Forwarded message -----

From: **John Anderson** <jcanderson@berkeley.edu>

Date: Fri, May 24, 2019 at 1:56 PM

Subject: Re: Should UCB Continue the SSUFIE Program? Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Hi Michael,

**Yes, it is a good program to have, and it has been helpful to me in getting my wetlab research rebooted. It is a good solution to the sporadic problem of extra lab space. It also strikes me as legally complex, and I imagine you wrestle with these issues. Specifically, faculty housing companies in which they have equity in their own labs; accuracy of rent/cost assessments; access to university licenses such as software and journals by for-profit company employees; cost to EH&S and other UCB bureaucracy.**

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Feedback from SSUFIE VEF and startup co-founder: Ray (Po Jui) Chiu

----- Forwarded message -----

From: **Po Jui Chiu** <raychiu@bioinspira.com>

Date: Wed, May 8, 2019 at 5:47 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Benson Fan <bensonfan@bioinspira.com>, Tiff Dressen <tddressen@berkeley.edu>, Lynne HOLLYER <lhollyer@berkeley.edu>

Hello Mike,

Below is our feedback in blue to SSUFIE program for your reference.

1) OVERALL: To what extent is/was your SSUFIE beneficial to your startup?

**The program is really helpful. It is crucial to the survival of the startup, and providing a space that fits our needs as an early-stage company where we are still working on proving the technology and figuring out a go-to-market strategy.**

2) APPLICATION: To what extent were you satisfied with application process for your SSUFIE - including the pace, FMV determination, etc?

**It was a long process, but finally came to an agreement between both parties. So from 1-10 in satisfaction, I would give it a 6 or 7. I think it'd be a lot helpful if the rent could be more affordable as non-software startups usually have limited fundings at the beginning, plus the cost of running business is a lot higher too. Perhaps a deferred payment structure would also be very helpful. For example like 30-40% of the total rental could be deferred to a point when the company raises over a certain amount of funding.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of your SSUFIE - including the execution of your scope of work, and interactions with other people in the lab?

**This part is great. Everything works out pretty well.**

4) Do you have any other feedback?

**In general, it is a very good program and I hope it would continue to help student entrepreneurs bring their innovations to benefit human society.**

## EZNome in MCB under Prof Lin He

Location: LKS B122, B126, B330F

Notes:

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Feedback from SSUFIE lab PI: Prof Lin He

----- Forwarded message -----

From: **Lin He** <lhe@berkeley.edu>

Date: Tue, May 28, 2019 at 2:43 PM

Subject: Re: VCR Review of SSUFIE Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Hi Mike, here are my 2 cents.

Here are some questions for you to consider in your response:

1) OVERALL: To what extent are/were you satisfied with hosting the SSUFIE?

**I have not truly started hosting the SSUFIE yet. We just got approval and have not been able to place orders. We have gone through the application process, which are by in large smooth. I am quite satisfied with the application process, except that things could be a bit more streamlined and faster.**

2) APPLICATION: To what extent are/were you satisfied with the application process for your SSUFIE - including the help, pace, FMV determination, etc?

**I am very satisfied with the help, guidance and advice we obtained during the application process. I think the process is a bit slow understandably, but hopefully, as the program continues, things will be more streamlined when more admin staffs are familiar with this program.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of the SSUFIE - including interactions with people in the lab, sharing of equipment, etc?

**We have not started this process.**

4) We welcome any other feedback.

**It would be nice to have a staff training about this process. While Mike Cohen and Lynne Hollyer are fantastic, other accounting staff are less familiar with the program and may not know how to accommodate this. But overall, this is an exciting program, and I hope to see it continue to flourish.**

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Best regards



Lin He  
Thomas and Stacey Siebel Distinguished Chair Professor  
Molecular Cell Biology Department  
University of California at Berkeley  
Berkeley, CA 94720

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Feedback from SSUFIE VEF and startup co-founder & CEO: Sean Chen, PhD

----- Forwarded message -----

From: **Sean Chen** <seanchen@eznome.com>  
Date: Tue, May 28, 2019 at 3:57 PM  
Subject: RE: UCB Review of the SSUFIE Program / Re: Final Steps EZNome SSUFIE  
To: Michael COHEN <mcohen@berkeley.edu>  
Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Hi Michael,

**Thanks for the notice. To be honest, we haven't been able to accomplish anything within the last month, we are still stuck trying to set up an accounting fund for me to purchase animals through OLAC. Been going back and forth with Quig Driver and Sue Logan for weeks now, and I still unfortunately do not have the means to start working on projects. I would love to provide feedback on the SSUFIE once we actually begin doing work. I will keep you updated on our progress.**

Best

Sean Chen, Ph.D.  
CEO and Founder  
EZNAME  
Phone: 847-533-1673

## GenEdit in BioE under Prof Niren Murthy

Location: HMB #140

Notes: This SSUFIE approval process was initially slowed by the COI committee because, at that time, the committee was divided on how to handle SSUFIE COI.

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Feedback from SSUFIE lab PI: Prof Niren Murthy

----- Forwarded message -----

From: **Niren Murthy** <nmurthy@berkeley.edu>

Date: Wed, Apr 24, 2019 at 9:39 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Hi Mike, here are the answers to your questions

(1) OVERALL: To what extent are/were you satisfied with hosting the SSUFIE?

**Answer. The SSUFIE program is outstanding and absolutely necessary. GenEdit would not have survived without it. More importantly, faculty seem to be using their labs for start-ups already (without SSUFIE), and the SSUFIE program brings everything out in the open and makes it transparent.**

2) APPLICATION: To what extent are/were you satisfied with the application process for your SSUFIE - including the help, pace, FMV determination, etc?

**(2) Determining the cost of everything was complicated, and perhaps can be simplified. I would suggest a flat 3,000\$-5000\$ fee to participate in SSUFIE.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of the SSUFIE - including interactions with people in the lab, sharing of equipment, etc?

**(3) SSUFIE worked very well in my case. The GenEdit people were former members of my lab, they helped mentor people in my lab and also were also an important intellectual resource.**

4) We welcome any other feedback?

**(4) Overall a great program, the COI issue is difficult to deal with, but can be easily avoided by not having equity.**

Niren Murthy

Professor of Bioengineering

University of California at Berkeley

Lab website: <http://murthylab.berkeley.edu>

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Feedback from VEF and co-CEO: Kunwoo Lee, PhD

----- Forwarded message -----

From: **Kunwoo Lee** <lee@genedit.com>

Date: Wed, Apr 24, 2019 at 12:45 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Hyo Min Park <park@genedit.com>, Tiff Dressen <tddressen@berkeley.edu>

Hello Mike,

Hope everything is going well.

Glad to hear from you.

Below is my comment.

1) OVERALL: To what extent is/was your SSUFIE beneficial to your startup?

**I believe that SSUFIE is certainly beneficial to startups including GenEdit.**

2) APPLICATION: To what extent were you satisfied with application process for your SSUFIE - including the pace, FMV determination, etc?

**I think it was great. FMV determination was very clear because there are many facilities around and they tell what's FMV. IPIRA team was very supportive.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of your SSUFIE - including the execution of your scope of work, and interactions with other people in the lab?

**I think implementation was good. Scope was good and everything was good.**

4) Do you have any other feedback?

**I think that SSUFIE will facilitate technology translation a lot.**

**In our case, I and colleagues developed a technology, CRISPR-Gold, and published a good paper. We thought that translation of technology will be easy. However, it was very challenging. Every company that we talked raised many concerns and we realized that a lot of experiments are needed to be conducted to address the concerns. It would be very challenging for most of startups to conduct those experiments. Therefore, I think that SSUFIE will help technology developed at Berkeley to be proved for industrial scale up.**

Best,

Kunwoo

## Iota Biosciences in EECs under Prof Jose Carmena

Location: Northwest Animal Facility 120a / 122a

Notes: This was the first SSUFIE to get COI approval and a management plan. It also was the first SSUFIE to have animal-use. Those two breakthroughs impeded the approval process.

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Feedback from SSUFIE lab PI, and startup co-CEO: Prof Jose Carmena

----- Forwarded message -----

From: **Jose M. CARMENA** <jcarmena@berkeley.edu>

Date: Thu, May 2, 2019 at 3:18 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>, Michel Maharbiz <maharbiz@berkeley.edu>

Hi Mike,

Apologies for the delay getting back to you. We happy to provide feedback for the SSUFIE program. Please see below our answers to your questions.

Best,

Jose

> 1) OVERALL: To what extent is/was your SSUFIE beneficial to your startup?

**Our SSUFIE has been fundamental for Iota as it allowed us to start the pre-clinical physiology lab from the beginning of our series A in May 2018 (which is when the SSUFIE was approved), as opposed to waiting several months until establishing an animal facility elsewhere. Given the short length of our series A (~2 years) this has been very beneficial for our startup.**

> 2) APPLICATION: To what extent were you satisfied with application process for your SSUFIE - including the pace, FMV determination, etc?

**Overall satisfied. The review process required several COI committee iterations was cumbersome. But this was compensated by the proactive and helpful role of the VCR and IPIRA offices. In particular Randy Katz and Mike Cohen were a huge help providing insight and feedback on COI committee deliberations and ways to move forward.**

> 3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of your SSUFIE - including the execution of your scope of work, and interactions with other people in the lab?

**Extremely satisfied. From the beginning we put significant effort in avoiding any potential COI with our labs. The fact that the lab space under the SSUFIE is in a different location (NAF) than the rest of our laboratories (LKS and Cory Hall) makes things easier. As such, no one from our academic labs has any knowledge of the**

**activities of the startup.**

**The execution of the scope of work has been optimal given the prior knowledge of the IOTA personnel on animal protocol writing and submission, interactions with OLAC, purchasing supplies and animals in the NAF, etc.**

> 4) Do you have any other feedback?

**It would be great to have some guidelines about the termination process for the SSUFIE, other than the established 1 year renewal cliff + possible renewal for 1 more year. For instance, having flexibility for n months after the extra year/s renewal would be necessary as closing financial rounds and moving to other facilities not only take time but there is an intrinsic uncertainty factor that can span several months.**

**Finally, we would like to reemphasize how positive our SSUFIE experience has been and continues to be, and we are grateful to Berkeley and IPIRA.**

## Kepler Computing in MS&E under Prof Ramesh Ramamoorthy

Location: HMB 100

Notes: This was the first SSUFIE in the Material Science & Engineering department

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Feedback from SSUFIE lab PI: Prof Ramesh Ramamoorthy

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Feedback from SSUFIE VEF: Debo Olaosebikan

----- Forwarded message -----

From: **Debo Olaosebikan** <debo@keplercompute.com>

Date: Tue, Jun 4, 2019 at 7:21 AM

Subject: Re: UCB Review of SSUFIE Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

OVERALL:

**The SSUFIE has been extremely beneficial to Kepler. It allows us leverage Berkeley facilities and a core faculty member that is a world class expert in our technology. It also has the optimal point of view on IP.**

APPLICATION:

**The amount of paperwork involved in the SSUFIE was not overbearing. The application itself was fairly straightforward. It would be great for the process to move faster though. Understand that there are many approvals that need to happen and that there ends up being a queue of SSUFIE applications to be processed in some cases but it would be great to streamline the approval process for future applicants. We appreciate that the people we worked with directly like Michael Cohen were always extremely helpful in moving the process along.**

IMPLEMENTATION:

**We are at the start of our SSUFIE and so far our interactions have been great and we are extremely satisfied.**

OTHER:

**Without the SSUFIE, Kepler would not have had a local home base for prototyping, measurement, testing and world class research. Overall, it's an extremely important program and I strongly recommend that Berkeley continues to support it in the future.**

## Serinus Labs in EECS of Prof Ali Javey

Location: Cory 188

Notes:

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Feedback from SSUFIE lab PI: Prof Ali Javey

From: **Ali Javey** <ajavey@berkeley.edu>

Date: Tue, Apr 23, 2019 at 8:07 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Mike,

**This is a great program in my opinion. It has helped our startup tremendously; they have been able to secure two SBIRs as a direct result of it. It's an effective path towards enabling Berkeley students/postdocs/faculty to take their technology from the lab and transition them to industry. I hope the program can continue in the future.**

Ali

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Feedback from SSUFIE VEF and startup founding CEO: Hossain Fahad, PhD

**April 25, 2019**

**To: UC Berkeley Vice Chancellor for Research,**

**On behalf of Serinus Labs, I am providing this letter as feedback on UC Berkeley's SSUFIE program. Serinus Labs is a chemical sensors start-up that is spinning off technology developed at the Berkeley Sensor and Actuator Center (BSAC), to address critical emerging needs in a wide variety of industries spanning energy to healthcare. It is a deep semiconductor technology company that is currently engaged in R&D to further de-risk the technology before any commercialization can take place. We take great pride in being recognized as the first EECS-SSUFIE.**

**The SSUFIE program is continuing to be extremely important for Serinus Labs's survival, where temporary access to shared facilities through the program helped secure two SBIR phase 1 grants from the NSF and NASA. This has allowed Serinus Labs to hit the ground running, by providing a path to conduct necessary technology de-risking work. Overall, without the SSUFIE program, Serinus Labs would not exist today.**

**From start to finish, applying to the SSUFIE program was fast, considering that many unknowns such as individual fair market values/usage fees had to be worked out.**

Furthermore, getting all necessary departmental approvals was also rapid and enabled Serinus Labs to dive quickly without delays, which is vital for any early stage startup. We are also extremely satisfied with the implementation of our SSUFIE program. In particular, the well-defined descriptions of the tasks to be performed and clear distinctions between academic and commercial R&D, enabled quick and easy execution of our scope of work.

I cannot stress enough on the importance of the SSUFIE program for early stage Berkeley startups. It is a very unique opportunity and without which, it would have been impossible for Serinus Labs to secure seedfunding; where a major award criterion is the access to necessary R&D facilities. From the perspective of a small startup, this is a huge challenge in and of itself, especially with no funding. I sincerely hope that UC Berkeley continues the SSUFIE program as it will maximize the chances of success for early-stage deeptech startups and help foster the introduction of new and impactful technologies.

Please do not hesitate to contact me, should you need more information in support of the SSUFIE program.

Thank you.

Sincerely,

Hossain Fahad, Ph.D.  
Founding CEO  
Serinus Labs, Inc.



## Sonera Magnetics in EECS under Prof Sayeed Salahuddin

Location: Cory 144 & 355

Notes:

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Feedback from SSUFIE lab PI: Prof Sayeef Salahuddin

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Feedback from SSUFIE VEF: Dominic Labanowski, PhD

----- Forwarded message -----

From: **Dominic Labanowski** <dlabanowski@gmail.com>

Date: Wed, Jun 12, 2019 at 9:29 AM

Subject: Re: VCR Review of the SSUFIE Pilot Program / Re: SACI Approval of Sonera SSUFIE in Salahuddin Lab / Fwd: COE Dean's Office Approval of Sonera Magnetics SSUFIE in Salahuddin Lab / Fwd: Divison Chair Approval of Sonera Magnetics SSUFIE in Salahuddin Lab

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Tiff Dressen <tddressen@berkeley.edu>, Lynne HOLLYER <lhollyer@berkeley.edu>

Mike,

Please find my answers inline below!

Thanks,  
-Dom

On Tue, Jun 11, 2019 at 2:27 PM Michael COHEN <[mcohen@berkeley.edu](mailto:mcohen@berkeley.edu)> wrote:  
Dom,

The Vice Chancellor for Research (VCR) is conducting a review of the SSUFIE Pilot Program. The objective of the review is to determine whether Berkeley should continue the program; and if yes, then are there ways to improve it.

Sonera Magnetics was among the first SSUFIEs in EECS to be approved - congratulations!

Please provide written feedback via a reply-all to this email about your experience with the SSUFIE program.

Note that as described [here](#), the SSUFIE program is, by definition, not intended to become a large program on the campus (because the campus's priorities are research and education, not new product commercial R&D; and too much commercial activity would threaten UC's non-profit status).

Instead, the SSUFIE program is intended to address surgical opportunities in which temporarily leveraging the campus's special resources will foster the commercialization of innovations that solve societal problems or address technological opportunities.

Here are some questions for you to consider in your response:

1) OVERALL: To what extent is your SSUFIE beneficial to your startup?

**The SSUFIE provides us with access to resources otherwise not available in shared user facilities that are critical to the success of our startup. Sonera Magnetics was spun out of Sayeef Salahuddin's lab, and the core technology requires very specific tools and purity standards that cannot be found anywhere else. For example, while some similar tools exist in the Berkeley Nanolab, the fact that they are shared among many users doing many different things makes them too contaminated for our needs. Without the SSUFIE program we would have needed to purchase these tools ourselves even though we only need to use them occasionally, dramatically increasing the cost (and thus decreasing the likelihood) of completing our prototype.**

2) APPLICATION: To what extent were you satisfied with application process for your SSUFIE - including the pace, FMV fees determination, etc?

**Generally the SSUFIE process was quite straightforward. The contract was clear, and the FMV fees determined were reasonable. The FMV process, however, displayed how difficult it is to price certain custom pieces of equipment. I do not know that there is an easier way to do this, but it was the only hiccup in an otherwise easy process. I only stress this because I think getting access to custom equipment is one of the biggest strengths of the program, as many other commonly-used tools can be found in some sort of user facility somewhere.**

**Getting the SSUFIE put together took some time, but I think only some of it was due to procedural reasons (ie. waiting on committee meetings) and most was due to the fact that we decided to start the process knowing it would be several months before we would need the facilities, and so we were not pushing for speed.**

3) IMPLEMENTATION: To what extent are you satisfied with the implementation of your SSUFIE - including the execution of your scope of work, and interactions with other people in the lab?

**We do not foresee any issues, but we have not yet actually gotten into the lab due to some slowdowns with insurance on our end. We hope to get into the lab soon, however.**

4) Do you have any other feedback?

**Nope! Just to reiterate that without the SSUFIE program I am not sure how we would have obtained access to the resources we needed, and knowing that Berkeley had such a program was actually in our minds even as we were deciding to found the company.**



## Synvitrobio (now Tierra Biosciences) in EBI under Prof John Coates

Location: Energy Biosciences Building (prior to the EBI's move to Koskland Hall)

Notes:

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Feedback from the startup founding CEO: Zach Sun, PhD (conducted via phone)

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Feedback from Shelley Brozenick (the lab manager) on behalf of Prof John Coates

----- Forwarded message -----

From: **Shelley Brozenick** <sbrozenick@berkeley.edu>

Date: Wed, Apr 24, 2019 at 11:40 AM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Dr. John Coates <jdcoates@berkeley.edu>, Lynne HOLLYER <lhollyer@berkeley.edu>,  
Tiff Dressen <tddressen@berkeley.edu>

Dear Mike,

Please see our responses below each question.

1) OVERALL: To what extent were you and Shelley satisfied with hosting the 2 SSUFIEs?

**The EBI was very satisfied with the experience and support offered by IA0.**

2) APPLICATION: To what extent were you and Shelley satisfied with application process for your SSUFIEs - including the help, pace, FMV determination, etc?

**I don't recall specifics of the application process but in general most aspects of the program seemed to work very smoothly for us as hosts and for the companies.**

3) IMPLEMENTATION: To what extent were you satisfied with the implementation of the SSUFIEs - including interactions with people in the lab, sharing of equipment, etc?

**There were a few hiccups here and there with Visolis adding new employees and not always informing the EBI, exceeding allocated space, and ignoring standard lab protocol (not wearing lab coats, etc.). However, these issues were dealt with in a positive, professional, and constructive manner by all parties involved.**

4) Do you have any other feedback?

**I have high regard for the SSUFIE program and would absolutely recommend it to other campus departments. My only complaint is related to financial management. Because the incubator companies were set up as research projects in the system CGA did not view or manage them as revenue accounts. Therefore, the funds paid by SVB**

**and Visolis for space and equipment usage are still not accessible to the EBI. Although, Lynne contacted CGA several weeks ago to explain what happened and authorize modifications to these funds CGA has not yet resolved the problem.**

Thank you,  
Shelley

## Valitor in Chemistry under Prof Matt Francis

Location: Latimer 726

Notes: This was the first SSUFIE in the College of Chemistry

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Feedback from the SSUFIE lab PI: Prof Matt Francis

----- Forwarded message -----

From: **Matthew B. Francis** <mfrancis@berkeley.edu>

Date: Thu, May 23, 2019 at 12:49 PM

Subject: Re: Should UCB Continue the SSUFIE Program? Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Hi Mike-

Sorry I missed the request earlier. Here are my comments:

**We have been very satisfied with the SSUFIE Program and with our specific user (Valitor, a company with which I have no affiliation). This is a very nice way to help cover maintenance and upkeep costs for expensive equipment items in our labs. The users have been very polite and hosting them has not been a disruption in any way. I think the approval process was particularly lengthy in our case, but that was understandably because we were (as I understand it) the first ones. In short, this is a great way to benefit both academic labs and the local industrial community with next-to-no effort. I hope this program can continue into the future.**

I am happy to answer any additional questions you may have-

Matt

*Matthew B. Francis*

*UC Berkeley Chemistry*

[mbfrancis@berkeley.edu](mailto:mbfrancis@berkeley.edu)

510-643-9915

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Feedback from SSUFIE VEF and startup founding CEO: Wes Jackson, PhD

----- Forwarded message -----

From: **Wesley Jackson** <>wjackson@valitorbio.com>

Date: Tue, Apr 30, 2019 at 1:01 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Hi Mike: I was able to type up some responses on the plane last night. Let me know if you'd like to discuss any of these comments by phone for additional context.

Best,  
Wes

1) OVERALL: To what extent is/was your SSUFIE beneficial to your startup?

**The SSUFIE program enabled us to access an instrument that was critical to characterizing our drug products. We were not able to identify an equivalent instrument within a reasonable distance from Berkeley, but I was able to identify one in Prof. Francis's lab. He indicated it was currently underutilized, and we would be able to perform our key experiments without impacting his lab.**

2) APPLICATION: To what extent were you satisfied with application process for your SSUFIE - including the pace, FMV determination, etc?

**The application process was extensive given the number of approvals and verifications that were required. However, the \*pace\* of the application approval exceeded my expectations given that everyone involved the process was clearly invested in the program and wanted to minimize any delays to our progress. I appreciate everyone's effort to make this program possible.**

**I felt that the FMV determination was overly conservative out of concern for under-evaluating the value of the services provided. In our case, there was bias to match the hourly rate of the closest available equivalent equipment with less emphasis on the additional services/maintenance at that site relative to other core facilities that were a better comparable to walk up instrumentation, which reflects the status of the instruments covered under our SSUFIE. As a result, our pricing probably ended up getting set above FMV.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of your SSUFIE - including the execution of your scope of work, and interactions with other people in the lab?

**Overall execution went very well, with the only exception being the process for setting FMV. Our interactions with IPIRA were universally positive and everyone was helpful to facilitate the process. Prof Francis was highly supportive and engaged in the process and appreciated that the excess capacity of their instrument could be used by investigators outside of his lab in a way that could bring funding into his lab. The personnel in the laboratory have been gracious hosts to my personnel in the lab, and hopefully their interaction with the Valitor team has provided some insight into operations within a biotech startup.**

4) Do you have any other feedback?

**It seems like the program is currently best suited for small virtual companies that need access to a variety of resources that are primarily concentrated within a specific PI's lab space. At our stage, we already have our own dedicated lab space.**

**Our needs would be best served by a “virtual core facility,” (i.e., we might use a specific pieces of equipment that are scattered in different PIs labs across the University). It would be amazing if there was an instrument-only “SSUFIE-lite” process that would enable access specific pieces of equipment via a set recharge rate. It might be effective reduce the approvals process since there would be substantially less impact on lab resources apart from the specific equipment use.**



## Visolis Bio in EBI under Prof John Coates

Location: Energy Biosciences Building (prior to the EBI's move to Koshland)

Notes:

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Feedback from CEO: Deepak Dugar, PhD

----- Forwarded message -----

From: **Deepak Dugar** <dugar@visolisbio.com>

Date: Mon, May 27, 2019 at 9:40 PM

Subject: Re: Should UCB Continue the SSUFIE Program / Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Hi Mike,

Sorry for the late reply, I just got back from long international trip.

**I would highly recommend continuing the program. It was very helpful for us in terms of being able to have a stable location for two years of early development work. Happy to get on a call and talk more if that's helpful.**

Best,  
Deepak

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Feedback from Shelley Brozenick (the lab manager) on behalf of Prof John Coates

----- Forwarded message -----

From: **Shelley Brozenick** <sbrozenick@berkeley.edu>

Date: Wed, Apr 24, 2019 at 11:40 AM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Dr. John Coates <jdcoates@berkeley.edu>, Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Dear Mike,

Please see our responses below each question.

1) OVERALL: To what extent were you and Shelley satisfied with hosting the 2 SSUFIEs?  
**The EBI was very satisfied with the experience and support offered by IAO.**

2) APPLICATION: To what extent were you and Shelley satisfied with application process for your SSUFIEs - including the help, pace, FMV determination, etc?

**I don't recall specifics of the application process but in general most aspects of the program seemed to work very smoothly for us as hosts and for the companies.**

3) IMPLEMENTATION: To what extent were you satisfied with the implementation of the SSUFIEs - including interactions with people in the lab, sharing of equipment, etc?

**There were a few hiccups here and there with Visolis adding new employees and not always informing the EBI, exceeding allocated space, and ignoring standard lab protocol (not wearing lab coats, etc.). However, these issues were dealt with in a positive, professional, and constructive manner by all parties involved.**

4) Do you have any other feedback?

**I have high regard for the SSUFIE program and would absolutely recommend it to other campus departments. My only complaint is related to financial management. Because the incubator companies were set up as research projects in the system CGA did not view or manage them as revenue accounts. Therefore, the funds paid by SVB and Visolis for space and equipment usage are still not accessible to the EBI. Although, Lynne contacted CGA several weeks ago to explain what happened and authorize modifications to these funds CGA has not yet resolved the problem.**

Thank you,  
Shelley

## Water Harvesting in Chemistry under Prof Omar Yaghi

Location: Latimer 606, 626, 633, 640

Notes:

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Feedback from SSUFIE lab PI: Prof Omar Yaghi

----- Forwarded message -----

From: **Omar Yaghi** <yaghi@berkeley.edu>

Date: Mon, Jun 3, 2019 at 12:07 PM

Subject: Re: VCR Review of SSUFIE Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: laura <laura@berkeleycatalystfund.com>, Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Dear Mike,

Thank you for your email and for giving me a chance to comment on the program. I have attached some comments to the questions you listed that summarize the essentials of the feedback.

\* \* \* \* \*

Omar M. Yaghi

James and Neeltje Tretter Chair Professor of Chemistry  
University of California, Berkeley

Faculty Scientist  
Lawrence Berkeley National Laboratory

Co-Director:  
Kavli Energy NanoSciences Institute at Berkeley  
California Research Alliance by BASF

<http://yaghi.berkeley.edu/>

On Thu, May 23, 2019 at 11:54 AM Michael COHEN <[mcohen@berkeley.edu](mailto:mcohen@berkeley.edu)> wrote:  
Omar,

The VCR is reviewing the 2-year SSUFIE Pilot Program.  
The objective of the review is to  
determine whether Berkeley should continue the program; and  
if yes, then are there ways to improve it.

Now that the WHI SSUFIE has been underway for about a month,  
please provide written feedback via a reply-all to this email  
about your experience with the SSUFIE program.

Note that as [described here, the SSUFIE program](#) is, by definition, not intended to become a large program on the campus (because the campus's priorities are research and education, not new product commercial R&D; and too much commercial activity would threaten UC's non-profit status).

Instead, the SSUFIE program is intended to address surgical opportunities in which temporarily leveraging the campus's special resources will foster the commercialization of innovations that solve societal problems or address technological opportunities.

Here are some questions for you to consider in your response:

1) OVERALL: To what extent are/were you satisfied with hosting the SSUFIE?

**I am satisfied with hosting the SSUFIE program. I think it's an important step in addressing technological opportunities and making sure we are at the forefront without taking away from academic basic research.**

2) APPLICATION: To what extent are/were you satisfied with the application process for your SSUFIE - including the help, pace, FMV determination, etc?

**I think it worked fine. It seems the application process was delayed at the department/Dean level for some reason (not dealing with the merit of the case). It could have been dealt with more expeditiously.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of the SSUFIE - including interactions with people in the lab, sharing of equipment, etc?

**So far this has worked seamlessly. My group members are helpful and supportive in this regard,**

4) We welcome any other feedback.

**This is a very useful program and it is set up also very well.**

-----  
Feedback from SSUFIE VEF and startup CEO: Bruno Marchon, PhD

----- Forwarded message -----

From: **Bruno Marchon** <bmarchon@gmail.com>

Date: Tue, Jun 4, 2019 at 3:38 PM

Subject: Re: SACI Approval for WHI SSUFIE in Yagi Lab / Fwd: COC Approval of WHI SSUFIE in Yaghi Lab / Fwd: Dept Chair Approval of WHI SSUFIE in Yaghi Lab / Fwd: Yaghi SSUFIE COI Letter

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Dear Mike: here are some replies (in blue) to your questions

1) OVERALL: To what extent are/were you satisfied with hosting the SSUFIE?

**Very satisfied**

2) APPLICATION: To what extent are/were you satisfied with the application process for your SSUFIE - including the help, pace, FMV determination, etc?

**Process took a bit longer than initially expected, but good communication and single point of contact with the UC side was a great help. We always felt confident that the process was progressing positively. We thought that the FMV determination was fair.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of the SSUFIE - including interactions with people in the lab, sharing of equipment, etc?

**The help with are getting from Prof. Yaghi's lab, his staff and students is great.**

4) We welcome any other feedback. We are very happy with this agreement.

**The help we get from UC Berkeley and the SSUFIE program is invaluable.**

----- Forwarded message -----

From: **Michael COHEN** <mcohen@berkeley.edu>

Date: Tue, Jun 4, 2019 at 3:43 PM

Subject: Re: SACI Approval for WHI SSUFIE in Yagi Lab / Fwd: COC Approval of WHI SSUFIE in Yaghi Lab / Fwd: Dept Chair Approval of WHI SSUFIE in Yaghi Lab / Fwd: Yaghi SSUFIE COI Letter

To: Bruno Marchon <bmarchon@gmail.com>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Bruno,

Thanks for your feedback.

It will be included in the VCR review.

In #3 you state that you're getting help from the Yagi lab's staff and students.

Please describe this help.

We are not asking this question to police the situation.

Instead, we want to know how staff and students perceive SSUFIE startups in the lab.

Thanks,

Mike

On Wed, Jun 5, 2019 at 2:31 PM Bruno Marchon <[bmarchon@gmail.com](mailto:bmarchon@gmail.com)> wrote:

**Mike: in Eugene's case, since he is a former student from that lab, he still has a lot of connections with the students, postdocs etc.. With his visiting scholar status, he is more than a "user" of the facilities, and he still enjoys academic discussions with the entire staff. Everyone is obviously well aware of the "firewall" restrictions for IP, trade secrets etc., and this adds some limitation to a free and open scientific exchange. But the scholarly discussions and the mutual assistance from his former friends and colleagues are still very useful.**

## ZestBio in BioE under Prof John Dueber

Location: EBB 542 & 2151

Notes:

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Feedback from SSUFIE lab PI: John Dueber

----- Forwarded message -----

From: **John Dueber** <dueber@gmail.com>

Date: Sun, Jun 23, 2019 at 8:06 PM

Subject: Re: Should UCB Continue the SSUFIE Pilot Program / Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

**Hi Mike,**

**I profusely apologize for my late reply, it's been an incredibly hectic period and I'm still digging out.**

**I think the SSUFIE program is fantastic in filling the growing need on campus for students to leverage IP they generate in their university studies towards the difficult initial stage of exploring commercial viability. It has been the perfect opportunity for Ryan to use the equipment he is familiar with to get his company off to a good start. My only constructive feedback from my end was that the paperwork required wasn't clear (at least at the PI level). It would be good to have a checklist to go through so it is straight forward what needs to be done. I completely understand that this was the first offering, and this is likely already upgraded.**

**If you have any specific questions, don't hesitate to ask.**

**John**

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Feedback from SSUFIE VEF and startup CEO: Ryan Protzko, PhD

----- Forwarded message -----

From: **Ryan Protzko** <rprotzko@berkeley.edu>

Date: Wed, Apr 24, 2019 at 1:09 PM

Subject: Re: VCR Review of SSUFIE Pilot Program

To: Michael COHEN <mcohen@berkeley.edu>

Cc: Lynne HOLLYER <lhollyer@berkeley.edu>, Tiff Dressen <tddressen@berkeley.edu>

Please consider these responses below and reach out if you have any questions!

1) OVERALL: To what extent is/was your SSUFIE beneficial to your startup?

**The SSUFIE program has been integral to realizing the commercial potential of the intellectual property and basic research established here at UC Berkeley during my PhD work. While we are still far from commercialization of the technology, this past year in the SSUFIE program has allowed our company to establish important industrial contacts, build a commercial model of the process and incubate the industrial goals of what was previously very academic research.**

2) APPLICATION: To what extent were you satisfied with application process for your SSUFIE - including the pace, FMV determination, etc?

**The SSUFIE process was fairly meticulous, but we understood that it was a new pilot program and there were boards worth considering our eligibility for the program. In the future, it would be great if there was a pamphlet or outline describing the application and approval process for SSUFIE agreements.**

3) IMPLEMENTATION: To what extent are/were you satisfied with the implementation of your SSUFIE - including the execution of your scope of work, and interactions with other people in the lab?

**We have been satisfied with the implementation of our SSUFIE and our scope of research has not changed. We believe our presence has fostered further innovation within the lab. We do not meet formally with our host lab, but when they have questions about commercialization of lab-scale processes we can act as in-house experts for those questions. Furthermore, it has opened up awareness of on-campus accelerators and programs, such as Skydeck and Big Ideas, to the academics we work beside. These programs would otherwise not be explicitly exposed to them.**

4) We welcome any other feedback.

**Further interaction with other SSUFIE companies would foster more of a community for startups participating in the program.**

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## Feedback for Co-Chair of the UCB Campus Conflict of Interest Committee

----- Forwarded message -----

From: **David Graves** <gravesdav@gmail.com>

Date: Sat, Jul 6, 2019 at 3:24 PM

Subject: Re: COI Chair SSUFIE feedback request

To: Michael COHEN <mcohen@berkeley.edu>

Cc: John WAWRZYNEK <johnw@berkeley.edu>, Carol MIMURA <carolm@berkeley.edu>, Pat Schlesinger <pschlesinger@berkeley.edu>, Alaisha Hellman <amhellman@berkeley.edu>

Hi Michael,

I will respond just for myself since I have not spoken with John or other committee or staff colleagues after reading the comments you attached.

First, it seems people who use it are quite happy with the program for the most part. That is a big plus and congrats to all those (you included I'm sure) who have made this work so far.

The main issues with the COI committee are always the same: first, identify when a financial conflict exists for a PI and second, help the PI manage it. Our only real tool is communication - between PI and students (and associated ad hoc department committees) and between PI and the public and the scientific community. Of course, we recognize we will never avoid all problems but we hope we can help minimize them.

I think the main concern of the COI (and certain members felt more strongly than others) was that SSUFIE would represent a constant temptation on the part of the PI to use lab equipment/expertise and other resources to favor the company at the expense of other projects and group priorities, thus potentially compromising UCB values and educational objectives.

My own view has been that, while potential abuses can be imagined, many advantages can be imagined as well, as the PI testimony you have collected indicates.

I learned some things - I did not realize, for example, that some PIs have no equity in the companies. Niren Murthy wrote:

"Overall a great program, the COI issue is difficult to deal with, but can be easily avoided by not having equity."

I'm not sure exactly what he really meant, I should note! Maybe he, like Matt Francis, was simply 'renting' equipment. Matt wrote:

"We have been very satisfied with the SSUFIE Program and with our specific user (Valitor, a company with which I have no affiliation). This is a very nice way to help cover maintenance and upkeep costs for expensive equipment items in our labs."

In any case, the COI committee is primarily trying to make sure that if a PI does anything (SSUFIE or not) that could affect her/him financially, then this connection is publicly acknowledged and known to his/her students who should have the option of not being involved with the activity if they feel it is not in their educational/career interests. In principle, this objective can be successfully attained through the SSUFIE program as well as the other activities the PIs might engage in, assuming we maintain our current system of oversight.

So, it seems to me things are reasonably well on track.

But of course, others have their views as well!

Regards,

David