

Snapshot: Civil Rights, AI, and Privacy

Acknowledgments



This brief is the beginning of a *Snapshot* series, an initiative of the Center for Civil Rights and Technology (Center) meant to educate and empower civil and human rights organizations looking to engage on technology policy issues.

The Center is a joint project of The Leadership Conference on Civil and Human Rights and The Leadership Conference Education Fund. The Center, launched in September 2023, serves as a hub for advocacy, education, and research at the intersection of civil rights and technology policy. Our experts dive into the most pressing policy issues in three key areas: AI and privacy, voting and platform accountability, and broadband access.

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Snapshot: Civil Rights, AI, and Privacy was born from a convening of civil rights, technology policy, consumer protection, and labor leaders led by the Center on May 30, 2024. Civil society advocates discussed the state of civil rights in technology law and policy, focusing on federal comprehensive data privacy legislative efforts, as well as federal efforts to build guardrails around AI and related products, systems, and tools. The *Snapshot* outlines the conversations held that day, serving as a mile marker of the data privacy and AI federal policy dialogue at that time as well as a look forward.

The author and publisher are solely responsible for the accuracy of statements and interpretations contained in this publication.

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I. Overview

The political and policy landscape and appetite for meaningful action at the federal level on artificial intelligence (AI) and data privacy governance is rapidly evolving. Just a few months ago, Congress seemed poised to move a comprehensive privacy bill through the legislative process while Senate Majority Leader Chuck Schumer's release of the bipartisan AI Roadmap appeared to spur interest by lawmakers to advance robust AI governance proposals.^{i,ii}

Progress on both quickly fizzled out as Congress broke for August recess this year. Further, while holding federal government agencies accountable to the Executive Order on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence (AI Executive Order or EO) remains a critical priority for many civil rights organizations, President Joseph R. Biden's decision to end his re-election bid creates uncertainty about what agency obligations may look like under a future administration.

It will be important for civil society organizations, including members of The Leadership Conference on Civil and Human Rights, to be ready when the next opportunity to advocate for critical civil rights protections in governance around AI and data privacy arises. This *Snapshot* identifies a number of civil society demands and recommendations for privacy and AI regulation, as well as on potential tactics groups may take in their advocacy.

II. Background



On May 30, 2024, the Center for Civil Rights and Technologyⁱⁱⁱ convened civil rights, technology policy, consumer protection, and labor leaders to discuss the state of civil rights in technology law and policy. The convening focused on federal comprehensive data privacy legislative efforts, as well as federal efforts to build guardrails around AI and related products, systems, and tools. Participants represented a diverse range of constituencies and interests who engage in the policymaking ecosystem from a variety of perspectives, including civil rights advocacy organizations, digital rights groups, think tanks, litigators, and researchers. This *Snapshot*, like the convening itself, is organized around four topics: Foundation Setting; Deep Dive: Comprehensive Privacy Legislation; Deep Dive: Congressional AI Agenda; and Deep Dive: AI and Agency Accountability.

The May 2024 convening built on learnings from a February 2024 public forum with leading civil rights experts, who discussed the top civil rights issues intersecting with the proliferation of AI.^{iv} The subsequent May closed-door meeting of advocacy, litigation, and research groups deepened those conversations and facilitated the exchange of additional information and learnings. The participants explored strategic steps to advance civil rights protections in emerging technology policy discussions, including policies being crafted by the Biden administration, within federal agencies, and in Congress. The group also discussed activities at the state level. Participants engaged under Chatham House rules and received a draft copy of this report before publication. Some participants opted out of being listed in the appendix.

This *Snapshot* shares collective insights raised throughout the May 2024 discussion about the issues within the AI and comprehensive privacy governance debates that are of greatest importance to civil rights organizations and their allies in the digital rights space. While this *Snapshot* does not reflect a shared agenda of all participants, it does consolidate a variety of comments and considerations for policymakers seeking a civil rights analysis of the proposals before them. Overall, the following represents high-level, common themes articulated during the convening:

- **Need for safeguards: Civil rights must be protected in the face of harms caused by AI across sectors. This is a critical step in any design, development, and deployment process, not a hurdle to overcome.**
- **Engagement with those who are impacted: Community engagement is needed. Those who are closest to the problems are also closest to the solutions.**
- **Protect privacy: A strong comprehensive federal privacy law that includes civil rights safeguards is critical; privacy rights are civil rights.**
- **Recognition of potential benefits: Positive use cases of AI can only occur if developers and deployers are intentional in ensuring AI is rights-preserving.**

III. Timeline of Major Regulatory and Legislative Efforts

August 2022:

Federal Trade Commission Advanced Notice of Proposed Rulemaking (ANPR) on Commercial Surveillance and Data Security published.

May 2023:

Equal Employment Opportunity Commission (EEOC) AI and Employment Selection Procedures Under Title VII of the Civil Right Act released.

March 2024:

Office of Management and Budget (OMB) Memo to Agencies on AI Governance, Innovation, and Risk Management released.

April 2024:

House Energy and Commerce Committee Chair Cathy McMorris-Rodgers and Senate Commerce Committee Chair Maria Cantwell announce bipartisan comprehensive privacy legislation, the American Privacy Rights Act (APRA), which contains many provisions of the ADPPA.

June 2024:

The Leadership Conference's Media and Telecommunications Task Force urges the House Energy and Commerce Committee to delay markup of APRA after news that civil rights provisions were stripped out.

June 2018:

California Consumer Privacy Act passes. Many argue this sets off a race at federal and state levels to pass comprehensive privacy legislation.

July 2022:

H.R. 8152, the America Data Privacy and Protection Act (ADPPA) passes the House Committee on Energy and Commerce,

October 2022:

White House Office of Science and Technology Policy Blueprint for an AI Bill of rights released.

October 2023:

EO 14110, Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence released.

April 2024:

National Institute of Standards and Technology (NIST) AI Risk Management Framework released.


May 2024:

Senate Majority Leader Chuck Schumer releases bipartisan AI Roadmap.

June 2024:

House Energy and Commerce Committee Chair Cathy McMorris-Rodgers cancels markup of APRA.

IV. Deep Dive: Comprehensive Privacy Legislation



During this session, participants focused on the American Privacy Rights Act (APRA), which at the time of this discussion still contained civil rights provisions, as well as requirements for covered entities to conduct impact assessments,^v in addition to privacy protections. An impact assessment is, “[a systematic examination of] the effects on society that may occur when a technology is introduced, extended, or modified.”^{vi}

As several participants noted, the APRA is in many ways a traditional data protection regime, reflecting privacy governance frameworks adopted both internationally and in some states. Like these frameworks, the ARPA would secure individual rights, require minimization, and mandate reasonable security practices.

However, during the discussion, many organizations raised areas where they wanted to see stronger language in a federal data privacy bill. For example, several groups wanted to ensure that the bill clearly prohibited cross-contextual behavioral advertising (otherwise known as targeted advertising), believing it to be the primary driver of bad data practices, including those that have civil rights impacts. This type of advertising is accomplished through, “the tracking of an individual’s activities across websites, applications, and services to identify and present advertisements tailored to their behavior. Typically, this involves the use of third-party cookies.”^{vii} Other groups raised concerns around preemption issues, including preemption of more protective state laws.

Participants also questioned the underlying definitions in the bill and whether they could be interpreted narrowly to avoid enforcement. How responsibility was divided between covered entities and service providers was one such example. Some participants were concerned that, with the current definitions, service providers could design discriminatory or privacy-invading products without recourse.

Most of the discussion focused on two proactive civil rights provisions in APRA as reported by the House Committee on Energy and Commerce’s Innovation, Data and Commerce Subcommittee in May of 2024.^{viii} The first of these provisions states:

A covered entity or a service provider may not collect, process, or transfer covered data in a manner that discriminates in or otherwise makes unavailable the equal enjoyment of goods or services on the basis of race, color, religion, national origin, sex, or disability.

A participant noted that this language is broadly consistent with federal and state public accommodation laws, although overarching federal protection is still necessary to fill large gaps. This section clarifies that companies may process data to ensure nondiscrimination and promote inclusion.

It expressly states that “(i) self-testing by a covered entity or service provider to prevent or mitigate unlawful discrimination; (ii) expanding an applicant, participant, or customer pool; or (iii) solely determining participation of an individual in market research” is permitted.

The second provision requires companies to conduct assessments of covered algorithms that assist companies in making “consequential decisions.” Large data holders^x must conduct more thorough impact assessments. Other covered entities and service providers must conduct algorithmic design evaluations if they “knowingly develop” such products. All companies within the scope of this section must either engage a certified independent auditor or share the evaluation with the National Telecommunications and Information Administration. Many advocates are encouraged by these new auditing requirements, but are concerned that they will be removed in response to corporate pressure. Auditing new and existing technologies can expose potential harms before they occur.

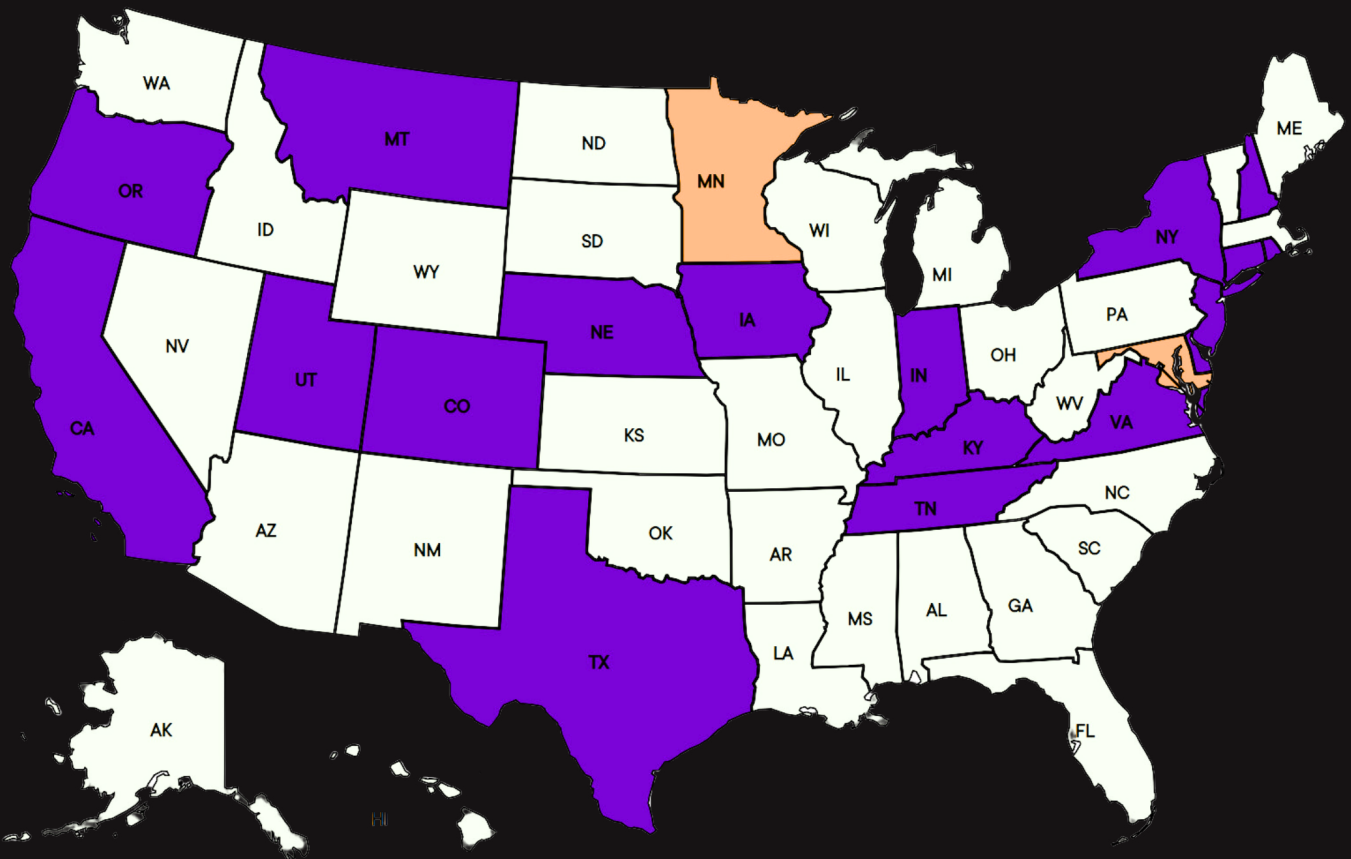
On June 25, 2024, the APRA was formally introduced, with a House Energy and Commerce Committee markup scheduled for later that week. Following introduction but before markup, provisions around civil rights protections and assessments of algorithmic designs to determine discriminatory impacts were struck from the bill.^x The Leadership Conference’s Media/Telecommunications Task Force swiftly protested the removal of these important protections and demanded their inclusion in the final version of the bill coming out of the committee’s markup.^{xi} The bill was pulled from the committee’s agenda at the last minute, reportedly due to opposition from both advocacy groups and corporations alike.ⁱⁱ

On the topic of AI regulation in comprehensive privacy legislation, the following activities were identified as important steps for civil rights groups and allies:

- **Advocate for the inclusion/return of explicit civil rights protections in any comprehensive privacy bill with bill sponsors and congressional leadership.**
- **Garner stronger support from Tri-Caucus offices and other interested members to heighten the need for strong civil rights protections.**
- **Collaborate with organizations for strategizing, education, and materials development.**
- **Develop further research and resources that emphasize the need for civil rights protections in comprehensive privacy legislation.**



State Data Privacy Laws & Civil Rights Protections




The Center released a survey of states showing a lack of comprehensive data privacy laws leave 132.59 million people of color unprotected. Out of 19 states with data privacy laws, only two only two states include explicit civil rights protections.

Learn more here:

<https://civilrights.org/state-data-privacy-laws/>

VI. Deep Dive: Congressional AI Agenda



The second conversation that day focused on Congress' more general AI agenda. The Roadmap for AI, published by a bipartisan group of senators in May 2024, was top of mind for participants,^{xiii} who were disappointed in the Roadmap's failure to take a strong position on protecting civil rights. Groups discussed the need to engage with Senate offices to advocate for the inclusion of such protections in AI legislation. A few participants felt that the tech industry's interests were clearly represented in the final document given their disproportionate presence during the AI Insight Forums that influenced the final content of the Roadmap.

The group also discussed whether AI regulation should be pursued comprehensively or by sector. The International Association of Privacy Professionals (IAPP) defines "comprehensive" data privacy legislation as: "work[ing] backward from what isn't comprehensive... [A] bill is not considered comprehensive if 'it does not qualify due to its scope, coverage, or rights.'"^{xiv} To be considered comprehensive, a data privacy law must cut across sectors and issues, and not simply be limited to health care data, for example. The consensus view was to take both approaches. A comprehensive approach will catch products or services that fall through the cracks of a sectoral approach. However, a comprehensive approach may be further down the road and important protections can be gained sector-by-sector in the meantime. To that end, one group published model legislation that can be adapted by congressional committees to update regulations within their jurisdiction.^{xv}

The impact of AI on voting and the elections was one of the most urgent topics identified for congressional action. Many organizations predict that the continued and growing use of AI to create deep fakes, spread misinformation, and discourage voting, especially targeting people of color. For example, one speaker pointed to robocalls targeting Spanish speakers.^{xvi} While the Senate Rules Committee has advanced several related bills the Protect Elections from Deceptive AI Act,^{xvii} AI Transparency in Elections Act,^{xviii} and Preparing Election Administrators for AI Act^{xix} – all bills endorsed by The Leadership Conference – out of committee, several advocates noted that passage was unlikely this Congress due to lack of bipartisan support. These bills have been the only major legislative step this Congress advanced to discourage the harmful tactics outlined above.

Many participants also had significant concerns about the ways in which AI will displace, discriminate against, or exploit job applicants and workers. Civil rights, tech policy, and labor organizations have called for more transparency and accountability, and are looking to Congress for help. It is important to highlight that several representatives noted they do not categorically oppose the use of AI in hiring or the workplace, but see a lack of transparency, care in design, and accountability for its impact.

On the topic of AI and workforce impacts, participants shared areas where congressional oversight and intervention would be important:

- **Ensuring that policymakers consider the impact of AI policy on workers and that worker representatives are meaningfully included in policy design; participants shared disappointment that many recent roadmaps and policy directives do not mention workers or unions at all.**
- **Ensuring a just transition for workers who will be displaced by AI, which may include education and training on how to shift to new roles using AI and wrap-around supports like cash and housing assistance.**
- **Explicitly prohibiting the use of AI tools that have a disparate impact on women, pregnant people, people of color, and other protected classes and historically marginalized groups. This includes hiring tools, and other products like productivity monitoring software that is more often used in fields with a disproportionate number of women and people of color.**
- **Encouraging products, services, and features to be offered in languages other than English.**
- **Investing in education and worker training to ensure participation of the workforce of the future.**

Finally, the group discussed whether the appropriations process could be leveraged to cement pro-civil rights executive branch policies that could otherwise change with a new administration. It was noted that influencing government procurement not only impacts government systems, but downstream commercial products as well, considering that the U.S. federal government is the largest consumer in the world. If tech companies have to adapt their products to fit government procurement rules, they are also likely to adapt their products for all their customers.


Groups pointed to the AI in Government Act^{xx} and Advancing American AI Act^{xxi} as models for such an approach. The AI in Government Act directed the OMB to issue guidance promoting the use of AI in government system while “protecting civil liberties, civil rights, and economic and national security” and to “identify best practices for identifying, assessing, and mitigating any discriminatory impact or bias on the basis of any classification protected under Federal nondiscrimination laws.” As discussed below, the resulting OMB memo included crucial protections to address potential harms.

Notably, some felt congressional floor schedules and shrinking number of moving bills meant it was prudent to consider other options, such as seeking the inclusion of safeguards in “must pass” appropriations packages.

On the topic of AI regulation, the following activities were identified as important steps for civil rights groups and allies:

- Encourage relevant committees to continue consideration of legislation on specific use cases like voting rights protections.
- Develop and provide accessible training materials for policymakers and the public on AI technology and its implications.
- Support funding for agency and private sector actions that protect civil rights in AI system development and deployment.
- Develop materials explaining how certain sectors can be affected by AI use in civil rights contexts.
- Highlight personal stories of AI harm.
- Encourage diverse community participation in AI policy discussions, particularly advocating for the inclusion of the most affected communities, such as people of color, in decisionmaking processes.
- Organize “boot camp” sessions to educate community advocates on AI governance and civil rights issues.

VII. Deep Dive: AI and Agency Accountability



Over the last several years, there has been a surge in substantive, sector-specific regulation and guidance, including those related to the use of data and technology. The civil rights, tech policy, consumer protection, and labor organizations at the May 2024 convening contributed to many of these pioneering proposals. At this session, these advocates agreed on the need to strongly encourage agencies to continue developing policies in more detail or take the steps necessary to finalize their regulations or guidance.

Much of the conversation focused on October 2023's Executive Order on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, the subsequent OMB AI Guidance memo, and agency actions. Among the policy developments that participants either contributed to or are actively monitoring are:

- **OMB's M-24-10: Memo to Agencies on Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence;**^{xxii}
- **Department of Justice's Request for Information on the use of AI in the criminal justice system;**^{xiii}
- **National Institute of Standards and Technology's Risk Management Framework;**^{xxiv}
- **Department of Homeland Security's Establishment of the Artificial Intelligence Safety and Security Board;**^{xxv}
- **National Science Foundation's National Artificial Intelligence Resource Research pilot;**^{xxvi}
- **Department of Housing and Urban Development Guidance on the Applications of Artificial Intelligence;**^{xxvii}
- **Department of Education's Office of Educational Technology Guidance on Designing for Education with Artificial Intelligence;**^{xxviii}
- **Department of Labor's Artificial Intelligence and Automated Systems in the Workplace under the Fair Labor Standards Act and Other Federal Labor Standard.**^{xxix}

The Biden administration published an 180-day update declaring completion of some of the EO's requirements; however, some important deadlines stretch later into this year and 2025.^{xxx} For example, the Attorney General will publish a report on the use of AI in the criminal justice system, including recommended best practices, in October 2024.^{xxxi}

The one-year anniversary of the EO in October 2024 will also prompt Department of Labor guidelines for preventing discrimination in hiring by federal contractors and guidance on the use of AI in education from the Department of Education.

Participants noted several other promising actions taken by agencies independent of the EO. The Federal Trade Commission (FTC) issued an advanced Notice of Public Rulemaking in 2022 regarding commercial surveillance and data security.^{xxxii} It reflected the scope of a comprehensive data protection or privacy regime and included questions about automatic decisionmaking and algorithmic discrimination. Specifically, the FTC sought information on the benefits, risks, and harms of these systems, whether and how to regulate them, and any legal or constitutional considerations in doing so. A diverse group of advocacy organizations filed comments,^{xxxiii} participated in public roundtables, and are now eager to see this process move forward. In the meantime, the FTC continues to issue guidance through its blog and set precedent through its enforcement actions.

The Equal Employment Opportunity Commission (EEOC) also issued technical guidance on “Assessing Adverse Impact in Software, Algorithms, and Artificial Intelligence Used in Employment Selection Procedures Under Title VII of the Civil Rights Act of 1964.”^{xxxiv} The EEOC guidance confirmed that longstanding non-discrimination laws and guidance apply to algorithmic decisionmaking tools and discussed what that means for selection tools.

And finally, the Consumer Financial Protection Bureau has twice clarified that consumers are entitled to explanations for adverse credit actions under current law, even if AI or algorithms make or inform those decisions. Creditors cannot avoid those explanations nor use outdated forms to disclose inaccurate reasons.^{xxxv}

One area for improvement for the federal government is consultation with public interest organizations and impacted constituencies. Several people mentioned the lack of appointments to Federal Advisory Committee Act (FACA) committees and other formal advisory positions that inform internal agency policymaking. Representatives of such committees spoke of their appointments and noted they are often the only or one of a few civil society participants. They reported that other appointees were largely from industry. Raising outside perspectives in those appointments has been a herculean effort, and as people commented, an unnecessarily difficult one, given the availability of policy experts and impacted people who can contribute.

On the topic of AI and agency accountability, the following activities were identified as important steps for civil rights groups and allies:

- **Submit comments to official rulemakings and requests for information.**
- **Engage with agency staff to share civil rights impacts of certain tools or services.**
- **Engage with key federal agencies to provide civil rights perspectives and to hold them accountable in implementing comprehensive and effective AI regulations.**
- **Push for effective operationalization of AI guidance, especially in procurement.**
- **Join advocacy letters and other coalition materials prepared by The Leadership Conference’s Center for Civil Rights and Technology.**

VIII. State Action

While the May 2024 convening focused on federal policy, participants did touch on the role of state action to address privacy and emerging technology. Most organizations at the convening indicated that they do not engage at the state level, and those that do noted the need for more support. One participant stressed that public interest advocates are even more overpowered in the states by industry and that extensive corporate lobbying is resulting in weak laws.

Several participants shared how state and federal proposals now regularly borrow from each other in the privacy and AI context. For example, there are similarities in Maryland and Minnesota's comprehensive data privacy laws and provisions from ADPPA.^{xxxvi} This seems to be a growing trend as states pass their own comprehensive privacy laws before congressional action. For example, 19 states have passed comprehensive privacy laws,^{xxxvii} and many of them have provisions affecting AI or algorithmic decision making. Only Maryland and Minnesota, however, have comprehensive privacy laws with explicit civil rights protections. Unfortunately, lobbying from the tech industry has successfully watered down or stymied state data privacy efforts.^{xxxviii} In a promising development, however, following passage of legislation, some states like California and Colorado have gone further to conduct extensive AI rulemaking.^{xxxix} It was therefore recommended by many to be aware of this iterative relationship even if groups do not intend to directly engage at every level.

Finally, as discussed above, beyond privacy laws and regulations, some states are beginning to tackle AI regulation.^{xi} Finally, as discussed above, beyond privacy laws and regulations, some states are beginning to tackle AI regulation.^{xii} Other states are considering or have passed laws targeting certain sectors or services such as social media, voting rights, government procurement, and more.^{xiii}

IX. Looking Forward

With the lightning-fast development of AI products, tools, and services, the importance of having strong data privacy protections to ensure that communities of color and other historically marginalized groups are protected from discrimination or exploitation remains critical. Likewise, the ubiquitous adoption of AI systems in ways that impact people's lives necessitates implementing measures to mitigate potential harms and ensure that technology benefits everyone.

While the political and policy winds are not always ideal for civil rights organizations engaging in the tech policy arena, the values and principles discussed throughout this *Snapshot* remain important to consider when the next opportunity for robust civil society engagement arises. In the meantime, civil rights organizations and their allies must continue to ensure that principles around equity and bias-free technology are enshrined in sectoral or standalone regulatory and legislative discussions when they occur.

X. Appendix

We had robust participation across the tech policy and civil society ecosystem at the Center’s May 2024 convening on the status of civil rights in federal technology policy, which informed this legislative brief. Participants included the following organizations. Further resources on the issues discussed can be found on each of their websites:

- [American Civil Liberties Union \(ACLU\)](#)
- [Asian Americans Advancing Justice | AAJC](#)
- [Center for American Progress](#)
- [Center for Democracy and Technology](#)
- [Color of Change](#)
- [Electronic Privacy Information Center \(EPIC\)](#)
- [Lawyers’ Committee for Civil Rights Under Law](#)
- [National Women’s Law Center](#)
- [NETWORK Lobby for Catholic Social Justice](#)
- [Public Knowledge](#)
- [Public Citizen](#)

ⁱ U.S. Representative Cathy McMorris Rodgers Congressional Website. “Committee Chairs Rodgers, Cantwell Unveil Historic Draft Comprehensive Data Privacy Legislation.” April 7, 2004. <https://mcmorris.house.gov/posts/committee-chairs-rodgers-cantwell-unveil-historic-draft-comprehensive-data-privacy-legislation>.

ⁱⁱ Perano, Ursula. “Bipartisan group of senators unveil long-awaited guidance on AI bills.” Politico. May 15, 2024. <https://www.politico.com/live-updates/2024/05/15/congress/schumers-roadmap-on-ai-bills-00157828>.

ⁱⁱⁱ Launched in September 2023 as a joint project of the The Leadership Conference Education Fund and The Leadership Conference on Civil and Human Rights, the Center for Civil Rights and Technology is a hub for advocacy, education, and research at the intersection of civil rights and technology policy.

^{iv} “Regulatory Code: AI, Civil Rights, and the Future of Our Democracy.” February 18, 2024. <https://civilrights.org/ccrt-convening/>.

- ^v American Privacy Rights Act. Section 113. Civil rights and algorithms (as reported by subcommittee.) https://d1dth6e84htgma.cloudfront.net/PRIVACY_04_xml_d1d6b82f10.pdf.
- ^{vi} International Association for Impact Assessment. “Technology Assessment.” <https://www.iaia.org/wiki-details.php?ID=26>
- ^{vii} Osano. “Marketing & the CPRA: What do you need to know?” <https://osano.com/articles/cpra-marketers>
- ^{viii} American Privacy Rights Act. Section 113. Civil rights and algorithms (as reported by the subcommittee.)
- ^{ix} Covered entities or service providers who have \$250 million in annual revenue and process either the covered data of 5 million people or sensitive data of 200,000 people. Sec 2(21) Definitions.
- ^x HR. 8818. American Privacy Act. 118th Cong., 2024 https://d1dth6e84htgma.cloudfront.net/H_R_8818_American_Privacy_Rights_Act_of_2024_a265f50b54.pdf (as Introduced June 25, 2024).
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- xx 40 U.S.C. 11301 note (Consolidated Appropriations Act of 2021, Pub. L. 116-260, Division U (2020)). <https://www.congress.gov/116/plaws/publ260/PLAW-116publ260.pdf>.
- xxi 40 U.S.C. 11301 note (James M. Inhofe National Defense Authorization Act for 2023, Pub. L. 117-263, title LXXII, Subtitle B (2022)). <https://www.congress.gov/117/plaws/publ263/PLAW-117publ263.pdf>.
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- ^{xxix} Department of Labor. “Artificial Intelligence and Automated Systems in the Workplace under the Fair Labor Standards Act and Other Federal Labor Standards.” https://www.dol.gov/sites/dolgov/files/WHD/fab/fab2024_1.pdf.
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