

## CONSUMER PROTECTION ACT: COGNIZANCE AMONG MEDICAL AND DENTAL PROFESSIONALS

<sup>1</sup>Dr. Gunjan Kumar, <sup>2</sup>Dr. Payal Dash, <sup>3</sup>Dr. Rajeev Raina, <sup>4</sup>Dr. Alok Kumar Sethi,  
<sup>5</sup>Dr. Md. Jalaluddin, <sup>6</sup>Dr. Samikshya

<sup>1</sup>MDS, Department of Public Health Dentistry, Kalinga Institute of Dental Sciences, KIIT deemed to be  
University Bhubaneswar – 751024, Odisha., India

<sup>2</sup>Department of Public Health Dentistry, Kalinga Institute of Dental Sciences, KIIT deemed to be  
University Bhubaneswar – 751024, Odisha., India

<sup>3</sup>Professor Department of Prosthodontics Institute of Dental Sciences, Seohra, Jammu

<sup>4</sup>Department of Oral & Maxillofacial Surgery, Kalinga Institute of Dental Sciences, KIIT deemed  
to be University Bhubaneswar – 751024, Odisha, India

<sup>5</sup>Department of Periodontics and Oral Implantology Kalinga Institute of Dental Sciences, KIIT deemed  
to be University Bhubaneswar – 751024, Odisha, India

<sup>6</sup>Department of Public Health Dentistry, Kalinga Institute of Dental Sciences, KIIT deemed to be  
University Bhubaneswar – 751024, Odisha., India

### Abstract

**Background:** Consumer Protection Act (CPA) aims to protect the interests of the patients in case of any unethical treatment rendered by a medical or a dental health professional. The present study was conducted to assess awareness of CPA among medical and dental professionals in Bhubaneswar city.

**Materials and Methods:** A cross-sectional study was conducted among 269 private medical and dental professionals in Bhubaneswar. A close-ended self-structured questionnaire was administered which contained 20 questions on awareness regarding CPA. Statistical analysis was done using chi square test. The p value was set at  $p > 0.05$ .

**Results:** The number of male subjects (145, 54%) were comparatively more as compared to the female subjects (124, 46%). Approximately, 85.5 % of total professionals had heard about the consumer protection act out of which 121 (45%,  $p$  value = 0.008) were dentists.

**Conclusion:** The results of the present study showed that only one third of the subjects were aware of the existence of CPA. Therefore, dental professionals need to keep them updated of various rules and latest amendments to save themselves from any litigation.

**Key words:** Ethics, healthcare professionals, Consumer protection, Dentists

### **1.1 Introduction**

The practice of medicine is popularly understood as the applying of medical or surgical agencies for the intention of preventing, relieving, or curing disease, or aiding natural functions, or changing, removing the outcomes of physical injury [1]. It is considered as the most sanctimonious profession worldwide. A doctor is worshiped next to Almighty God in our society [2]. It is a service-oriented, liberal profession, having a self-regulating code of ethics [3]. Today, we witness a fast pace of commercialization and globalization on all spheres of life and the medical profession is no exception to these phenomena [4].

According to WHO, more than 138 million patients are harmed every year due to doctors' errors [5]. In India, the Consumer Protection Act (CPA) of 1986 was enacted for better protection of the interests of consumer grievances which was done through quasi-judicial mechanisms set up at three distinct levels at district, state, and national levels. These consumer forums have been licensed to award compensation to aggrieved consumers for the misfortune they have endured [6]. On 13th November 1995, the honorable supreme court of India delivered judgment on application of consumer protection act, 1986 to the medical/dental profession, hospitals, dispensaries, nursing homes and other related services [2]. More than three decades of working in the Consumer Protection Act, 1986 necessitated a paradigm shift in the post globalization and digitization phase of India. All the services rendered by any medical or dental health care professional are covered under CPA except when the service is provided free of cost, especially in charitable or governmental dispensaries and hospitals and primary health centers [7, 8, 25].

The Consumer Protection Act (CPA) was essentially imagined to cover business and trade and to protect the interest of the buyer of goods and user of the services. In the Supreme Court Judgment of

Indian Medical Association (IMA) versus V. P. Shanta and others III (1995) (CPJ) SC, the court clearly stated that professional services rendered by professionals such as doctors and dentists fall in the definition of section 2 (0) of the CPA[9].

The new Consumer Protection Act, 2019, passed and accepted the presidential agreement on 9th August 2019, repealing the Consumer Protection Act, 1986, to strengthen consumer rights and dispensing consumer justice. It ideates a robust grievance redressal mechanism in the circumstance of e-commerce and e-governance. The slew of legal measures entails the inclusion of e-commerce, Central Consumer Protection Authority (CCPA), alternative dispute resolution (ADR), suo moto action against unfair trade practices, pecuniary jurisdiction, amplifying of grounds of complaints, penalties to deceptive advertisements and product safety and liability. From the standpoint of the medical profession, it is worthwhile to inquire that the new law has excluded the health care system[10,11].

## 1.2 Methods

A cross-sectional questionnaire survey was carried out among the private medical and dental students in Bhubaneswar using Snowball sampling technique from December 2020 to February 2021. A self-structured questionnaire comprising 20 questions was devised. The questionnaire was validated and modified following a Pilot study. The Cronbach's alpha of the questionnaire was good (0.85). The questionnaire was divided into two sections—Section A containing socio-demographic details of the participants. Section B comprised of 19 close-ended questions. The content validity index was 1. Written informed consent was obtained from the participants before data collection. Questionnaire was handed over to all the respondents by the investigator and later on collected from them. Incomplete questionnaires were excluded from the study. The present study conducted descriptive statistical analysis. Number and percentages were used to compute results on categorical measurements. Results were statistically analyzed using SPSS package version 21.0 and the p value was set at  $p > 0.05$  and chi square test was performed.

## RESULTS

After the exclusion of incomplete survey forms, a total number of 269 participants gave consent. The details of the participants regarding gender, level of education and type of degree are mentioned in Table 1. The number of male subjects (145, 54%) were comparatively more as compared to the female subjects (124, 46%). There were total 160 (59.4%) students under the graduation course out of which 85 (31.5%) students belonged to Bachelor of Medicine and Surgery (MBBS) and 75 (27.88%) students pursued Bachelor of Dental Surgery (BDS). Only 45 (16.72%) students pursued Masters in Dental Surgery followed by 64 (23.8%) students of Masters in Surgery/Medicine.

**Table 1 .Sociodemographic details of participants**

Characteristics		Number (n)	Percentage(%)
Gender	Male	145	54
	Female	124	46
Education Level	Graduate	160	59.4
	Post graduate	109	40.5
Type of degree	MBBS	85	31.5
	BDS	75	27.88
	MS/MD	64	23.8
	MDS	45	16.72

**Table 2. Relationship between professionals and knowledge regarding CPA**

		Medica l	Dental	p value
Have you heard about consumer protection act?	Yes	109	121	0.008
	No	6	15	
	Don't Know	14	4	
Are you aware of medical indemnity act?	Yes	108	59	<0.000**
	No	19	48	
	Don't Know	13	22	
CPA was passed in parliament in year	1986	50	80	0.005
	1988	30	41	

	1992	26	20	
	1995	7	15	
<b>Who is not liable under CPA</b>	private hospitals charging all	8	5	<0.000**
	Hospitals having free as well as paying patients	14	24	
	Hospitals offering free services to all	75	82	
	don't know	30	31	
<b>Consumer dispute redressal forum is at</b>	District level	13	43	<0.000*
	State level	25	72	
	National level	25	45	
	Don't Know	12	34	
<b>State commission has pecuniary jurisdiction to grant compensation of</b>	20 lakhs	13	36	<0.000*
	20 lakhs to 1crore	24	84	
	more than 1crore	12	38	
	Don't know	20	42	
<b>Time limit for appeal at various level is</b>	30 days	13	24	<0.000*
	45 days	15	34	
	60 days	31	40	
	90 days	25	33	
	Don't know	20	34	
<b>The doctor patient relationship is</b>	A professional contract	20	26	<0.001
	An implied contract	25	80	
	A written contract	25	60	
	Don't know	11	22	
<b>If a doctor fails to comply in a CPA compensation cases then punishment is in the form of</b>	Imprisonment	2	14	<0.001
	Fine up to 10,000/-	34	24	
	Both a & b	33	30	
	None of above	12	17	
	Don't know	55	48	
<b>National commission consist of ----- members</b>	Two	4	24	<0.001
	Three	26	25	
	Four	25	50	
	one	58	57	
<b>Who can file a complaint for compensation under CPA</b>	Patient	12	25	<0.001
	Lawyer of patient	13	13	
	State/Central Govt	22	60	
	All of above	24	100	
<b>Following are defenses against Professional Negligence EXCEPT</b>	Contributory negligence	2	9	<0.001
	Therapeutic Misadventure	27	24	
	Medical Maloccurance	25	30	
	Res IpsaLocutor	85	65	
	Don't know	1	1	
<b>A doctor need not inform the patient or get his consent incase</b>	If the information provided would not be processed rationally	4	11	<0.003
	Where delay in	23	43	

	consent may result in death			
	both a & b	46	65	
	Don't know	24	52	
<b>Negligence is a tort and the basic element of the tort is</b>	An act or omission on the part of the defendant	9	6	<0.004
	Breach of a strict duty on the part of the defendant	21	24	
	Both a and b	45	45	
	Don't know	63	50	
<b>IPC for Criminal Negligence is</b>	304- A	8	16	<0.05
	304- B	20	30	
	300	47	20	
	302	11	10	
	Don't know	57	50	
<b>Time limit to dispose off compensation cases at a level of Dist. Forum is</b>	Within 01 yr	12	24	<0.000
	Within 02 yr	12	42	
	Within 03 yr	54	51	
	None of above	23	50	
<b>If a surgeon operates upon a patient &amp; leaves behind an instrument in abdomen, the lapse will be termed as</b>	Personal injury to the patient	9	9	<0.000
	Professional liability	23	35	
	Professional negligence	70	71	
	Criminal negligence	22	30	
<b>All the cases coming under the CPA should be filed within</b>	2 years of its incidence	11	20	<0.001*
	3 years of its incidence	25	70	
	Anytime after the incidence	35	19	
	None of the above	42	46	
<b>Supreme Court of India included medical services under the ambit of CPA in</b>	1986	2	6	<0.000*
	1988	8	20	
	1995	31	30	
	1999	26	20	
	Don't Know	66	60	

\*\*-highly significant

The relationship between the students and the knowledge regarding CPA is depicted in Table 2. Approximately, 85.5 % of total professionals had heard about the consumer protection act out of which 121 (45%) p value =0.008 were dentists (Figure 1). About 62 % (p value=<0.000) of the participants were aware of medical indemnity act (Table 2). Amongst it, 108 (40.1%) belonged from medical profession in comparison to 59 (22%) dental professionals. 48.3 % professionals knew that CPA had passed in the year 1986. Only 26% of the practitioners were aware of consumer dispute redressal forum at National level. Around, 105 (39%) of the students were aware that the doctor patient relationship is an implied contract 94 (Table 3).

About 30 dentists knew about defenses against professional negligence and only 80 dental professionals were aware of the year in which Consumer Protection Act (CPA) was passed. (Figure 1)

**Table 3. Knowledge and responses of participants regarding CPA**

Variables	Frequency	Percentage
-----------	-----------	------------

		(n)	(%)
<b>Total Sample (n)</b>		269	100
<b>Have you heard about consumer protection act</b>	Yes	230	85.5
	No	21	7.8
	Don't know	18	6.7
<b>Are you aware of medical indemnity act</b>	Yes	167	61.7
	No	67	24.9
	Don't Know	35	13.0
<b>CPA was passed in parliament in year</b>	1986	130	48.3
	1988	71	26.4
	1992	46	17.1
	1995	22	8.2
<b>Who is not liable under CPA</b>	private hospitals charging all	13	4.8
	Hospitals having free as well as paying patients	38	14.1
	Hospitals offering free services to all	157	58.4
	don't know	61	22.7
<b>Consumer dispute redressal forum is at</b>	District level	56	20.8
	State level	97	36.1
	National level	70	26.0
	Don't Know	46	17.1
<b>State commission has pecuniary jurisdiction to grant compensation of</b>	20 lakhs	49	18.21
	20 lakhs to 1crore	108	40.1
	more than 1crore	50	18.6
	Don't know	62	23.0
<b>Time limit for appeal at various level is</b>	30 days	37	13.8
	45 days	49	18.2
	60 days	71	26.4
	90 days	58	21.6
	Don't know	54	20.1
<b>The doctor patient relationship is</b>	A professional contract	46	17.1
	An implied contract 94	105	39.0
	A written contract	85	31.6
	Don't know	33	12.26
<b>If a doctor fails to comply in a CPA compensation cases then punishment is in the form of</b>	Imprisonment	16	5.9
	Fine up to 10,000/-	58	21.6
	Both a & b	63	23.4
	None of above	29	10.8
	Don't know	103	38.3
<b>National commission consist of ----- members</b>	Two	28	10.4
	Three	51	19.0
	Four	75	27.9
	one	115	42.8
<b>Who can file a complaint for compensation under CPA</b>	Patient	37	13.8
	Lawyer of patient	26	9.7
	State/Central Govt	82	30.5
	All of above	124	46.1
<b>Following are defenses against Professional Negligence EXCEPT</b>	Contributory negligence	11	4.1
	Therapeutic Misadventure	51	19.0
	Medical Maloccurance	55	20.4
	Res IpsaLocutor	150	55.8
	Don't know	2	.7
<b>A doctor need not inform the patient or get his</b>	If the information provided would not be processed	15	5.6

<b>consent incase</b>	rationaly		
	Where delay in consent may result in death	66	24.5
	both a & b	111	41.3
	Don't know	76	28.3
<b>Negligence is a tort and the basic element of the tort is</b>	An act or omission on the part of the defendant	15	5.6
	Breach of a strict duty on the part of the defendant	45	16.7
	Both a and b	90	33.5
	Don't know	113	42.0
<b>IPC for Criminal Negligence is</b>	304- A	24	8.9
	304- B	50	18.6
	300	67	24.9
	302	21	7.8
	Don't know	107	39.8
<b>Time limit to dispose off compensation cases at a level of Dist. Forum is</b>	Within 01 yr	36	13.4
	Within 02 yr	54	20.1
	Within 03 yr	105	39.0
	None of above	73	27.1
<b>If a surgeon operates upon a patient &amp; leaves behind an instrument in abdomen, the lapse will be termed as</b>	Personal injury to the patient	18	6.7
	Professional liability	58	21.6
	Professional negligence	141	52.4
	Criminal negligence	52	19.3
<b>All the cases coming under the CPA should be filed within</b>	2 years of its incidence	31	11.5
	3 years of its incidence	95	35.3
	Anytime after the incidence	54	20.1
	None of the above	88	32.7
<b>Supreme Court of India included medical services under the ambit of CPA in a</b>	1986	8	3.0
	1988	28	10.4
	1995	61	22.7
	1999	46	17.1
	Don't Know	126	46.8

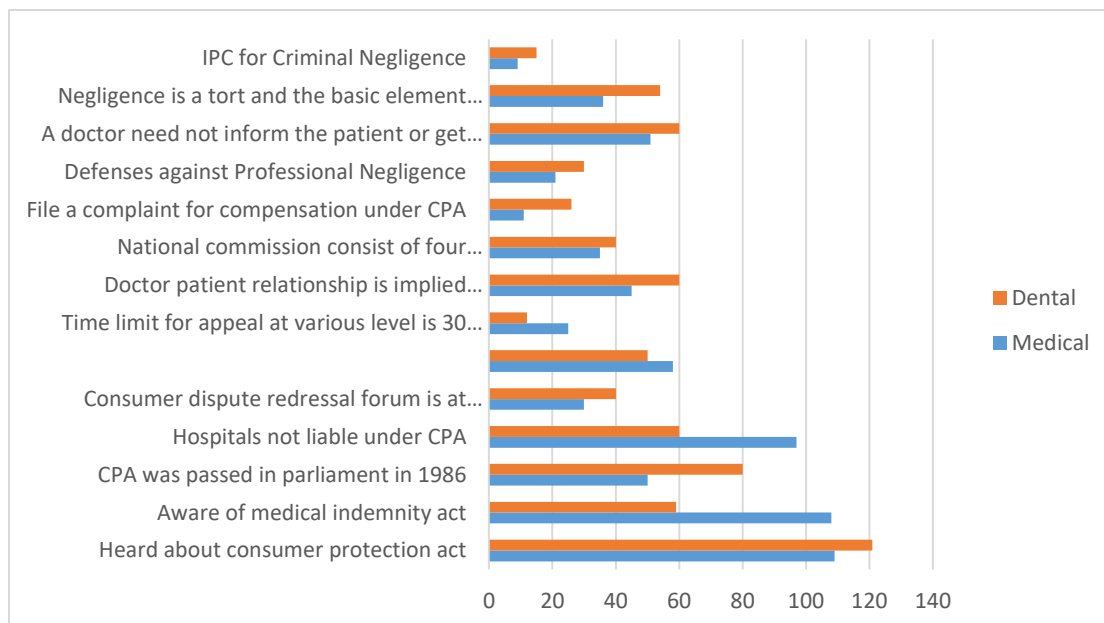


Figure 1 : Students response of various questions regarding CPA

### Discussion

The Consumer Protection Act, enforced in 1986, gives simple and accelerated compensation to consumer grievances. It precautions and supports consumers to speak against inadequacy and defects in goods and services. On July 20th, 2020, the new Consumer Protection Act, 2019 came into force in India, replacing the previous enactment of 1986. The new Act overhauls the administration and settlement of consumer disputes in India. It provides for strict penalties, including jail terms for adulteration and for misleading advertisements. The term “healthcare” was abstracted from the list of services. Despite the fact that it grants unsusceptibility to doctors from facing cases filed by discontented patients in consumer courts, the Indian Medical Association (IMA) was disgruntled with it. The removal of “healthcare” means consumers can no longer approach a consumer court for addressing issues of medical negligence or file complaints against doctors. However, they can approach High court or Supreme Court, seeking penalization or compensation for misdemeanor of Right to Life or any other fundamental right”[12]. Any matter in medical negligence on the part of the service provider will be considered as deficiency under section 42(11) of the new Consumer Protection Act, 2019[22].

In the present study, awareness regarding CPA was 34%, which is lesser than previous studies (67%–86.85%) conducted among dental practitioners[13-17]. Regarding knowledge of CPA, 13.8% practitioners, said patients can lodge a complaint without the presence of lawyer that is the patient himself can file the complaint. Similar responses were given by participants in previous studies.[13,18]

In other health-care fields, sometimes unexpected accidents occur despite our foremost efforts. Therefore, it is obligatory for all healthcare practitioners to obtain informed consent from their patients before every procedure. In our study, about 41.3 % of practitioners agreed that they would not inform the patient or get his consent in case if the information provided would not be processed rationally or where delay in consent may result in death. In previous studies,[19,20] practice of prevailing consent extended from 5.3% to 51.9% among dental practitioners who always took consent from the patients.

In the present study the awareness about the indemnity act was found significant among the medical and dental participants. Studies have also been conducted to know the knowledge and attitude of health care ethics among medical, dental and nursing students. It was significantly found to be more in medical postgraduates than in the medical interns and showed significant differences in nursing students[26].

However, there are also certain limitations. First of all, the study is a cross-sectional research with relatively small sample size and hence it is challenging to extrapolate the findings for the whole country. Since it was a questionnaire study, knowledge and awareness regarding CPA among respondents may or may not be predicted, reflecting the integral limitations of such studies. Further studies are warranted to investigate the awareness pertaining to the CPA by some better tools.

## Recommendations

The Bombay High Court on 11<sup>th</sup> of June 2021 suggested that the Maharashtra government considered creating a special cell of well-trained police officers to deal with registering FIRs against doctors over complaints of medical negligence during Covid 19 pandemic[21]. As the cases of doctors being attacked unnecessarily despite sticking to the protocol as much as possible has increased, its mandatory for the healthcare professionals to have professional indemnity insurance. It will protect against litigation and provide security to them. Studies have shown that 63% dental practitioners were aware and 35% held professional indemnity insurance, than the study done among dental practitioners in Mumbai city which was high.[18]

Written or digital records, including medical and dental history, chart notes, radiographs, photographs, and models are the only existent guiding principles, which are crucial in a delinquent lawsuit and must be carefully preserved. All records must be synchronous and must be signed and dated. The foremost defensive measure is avoiding the allegation in the first place. Hence, health professionals need to update their perceptive on CPA and its amendments to be legally prudent[24].

## Conclusion

There is an inequality regarding knowledge of CPA and practicing it. However, awareness regarding the CPA, among health professionals, was inadequate. Utilization of the professional indemnity insurance should be implemented in accordance to higher age, year of practice, and gender.

In this current pandemic era, doctors are increasingly facing legal challenges from dissatisfied patients. With this changing scenario, doctors have to adapt to the situation and may have to face such legal tangles, which is intangible and disturbing sometimes. It is insistent that all clinicians and practitioners should be aware of the medicolegal aspects of the field.

## Competing interest

None

## Funding

Nil

## Authors Contributions

GK designed the survey used in this study. PD prepared the manuscript and collected the data. AS, MJ and AJ were responsible for the conceptualization of the study, designed the survey and reviewed this manuscript for contextual content. GK assisted in data analysis and critically reviewed the manuscript. All authors have read and approved the manuscript

## Acknowledgments

Authors would like to thank the participants of the study for their cooperation without whom this work would never have been accomplished.

## Research Quality and Ethics Statement

The authors of this manuscript declare that this scientific work complies with reporting quality, formatting and reproducibility guidelines set forth by the EQUATOR Network. The authors also attest that this clinical investigation was determined to require Institutional Review Board / Ethics Committee review of Kalinga Institute of Medical Sciences, Bhubaneswar.

## REFERENCES

1. Hutchins, Harry B. "What Is the Practice of Medicine?" Mich. L. Rev. 4 (1906): 373-9.
2. Haripriya A, Haripriya V. Knowledge about Medical Law and its Negligence among Doctors: A Cross-Sectional Study. *Int J Sci Res Publ.* 2014;4:1–3.
3. Potdar RD. Consumer protection law and the pediatrician. *Indian Pediatr.* 1997;34:283–6.
4. Singh K, Shetty S, Bhat N, Sharda A, Agrawal A, Chaudhary H. Awareness of Consumer Protection Act among Doctors in Udaipur City, India. *J Dent (Tehran).* 2010 Winter;7(1):19-23. Epub 2010 Mar 31.
5. Assessed from <https://www.indiatoday.in/world/story/medical-mistakes-cause-2-6-million-deaths-yearly-who-1599019-2019-09-14> Assessed on 14.06.2021
6. Assessed from [http://ncdr.nic.in/bare\\_acts/Consumer%20Protection%20Act-1986.html](http://ncdr.nic.in/bare_acts/Consumer%20Protection%20Act-1986.html) Assessed on 14.06.2021
7. Shrivastava SR, Shrivastava PS, Ramasamy J. Scope of consumer protection act in medical profession in India. *J Clin Sci* 2014;11:25



8. Singh G, Gambhir RS, Singh S, Talwar PS, Munjal V. Knowledge and awareness of the Consumer Protection Act among dental professionals in India: A systematic review. *Indian J Dent*. 2014;5(3):146-151.
9. Ramachandrappa S, Sathyanarayan V. Awareness of consumer protection act, among medical and dental professionals a cross-sectional study from Davangere, Karnataka, India. *J Biomed Sci* 2015;1:14-9
10. Consumer Protection Act, 2019 and Its Implications for the Medical Profession & Health Care Services in India. *J Indian Acad Forensic Med*. 2019 Oct-Dec; 41(4)
11. Assessed from <https://theprint.in/health/healthcare-isnt-a-service-in-new-bill-but-ima-says-doctors-not-fully-protected-yet/260655/> Assessed on 14.06.2021
12. Assessed from <https://egazette.nic.in/WriteReadData/2019/210422.pdf> Assessed on 14.06.2021
13. Kumari HA. Knowledge of legal issues and consumer protection act among dentists in Coorg district, Karnataka. *Int J Dent Health Sci* 2015;2:14-21.
14. Prasad S, Menon I, Dhingra C, Anand R. Awareness of consumer protection act among dental health professionals in dental schools of Ghaziabad, India. *Oral Health Dent Manag* 2013;12:262-8.
15. Singh K, Shetty S, Bhat N, Sharda A, Agrawal A, Chaudhary H. Awareness of consumer protection act among doctors in Udaipur City, India. *J Dent (Tehran)* 2010;7:19-23. .
16. Mathur K, Deolia SG, Kalghatgi S, Suthar P, Sharma S, Khandelwal N. Knowledge, attitude and behavior of consumer protection act, among oral health professionals in Jodhpur, Rajasthan. *Int J Prev Clin Dent Res* 2014;1:15-9.
17. Yashoda R, Puranik MP, Kumar V, Farhanaz F. Dental practitioners' perspectives about the Consumer Protection Act, informed consent, and professional indemnity insurance in Bengaluru city: A cross-sectional study. *J Indian Assoc Public Health Dent* 2017;15:225-9
18. Dental Indemnity Insurance Survey. Assessed from: <http://www.gcdfund.org/news/charity-news/dental-indemnity-insurance-survey>. Assessed on 24.5.2021 .
19. Alagesan A, Vaswani V, Vaswani R, Kulkarni U. Knowledge and awareness of informed consent among orthodontists and patients: A pilot study. *Contemp Clin Dent* 2015;6:44-7.
20. Singh A, Bhardwaj A, Jindal R, Mithra P, Siddique A, Rajesh DR. A cross-sectional study of the patient's awareness and understanding of legal nature of informed consent in a dental hospital in rural Haryana. *J Educ Ethics Dent* 2012;2:25-7.
21. Assessed from <https://www.ndtv.com/india-news/maharashtra-bombay-high-court-suggests-special-police-cell-for-medical-negligence-cases-2461604> Assessed on 12.06.2021
22. Assessed from <https://www.mondaq.com/india/dodd-frank-consumer-protection-act/1062944/medical-negligence-india> Assessed on 10.6.2021
23. Gupta D, Thomas S, Dagli R, Solanki J, Bhateja GA, Mahajan R. Professional indemnity insurance used among graduated and post graduated dental surgeons in Mumbai city, India. *J Health Res Rev* 2014;1:44-8
24. Swapna LA, Koppolu P, Basil T, Koppolu D, Baroudi K. Awareness of Consumer Protection Act among the dental fraternity in India. *J Orofac Sci* 2016;8:27-33.
25. Gambhir RS, Dhaliwal JS, Anand S, Bhardwaj A. Knowledge and awareness of Consumer Protection Act among private dentists in Tricity, Punjab. *J Family Med Prim Care* 2015;4:347-51.
26. Pratyusha CH, Vineela P, Kumar SP, Nagarjuna P, Karishma J, Adithya P. Knowledge, Attitude and Practice of Health Care Ethics Among Medical, Dental and Nursing Colleges Students and Faculty in Visakhapatnam: A Questionnaire Study. *Int Healthc Res J*. 2020;4(5):126-135.