

3.1 Duty to Comment.

- A. The Council on Environmental Quality's (CEQ) National Environmental Policy Act (NEPA) regulations (40 CFR 1503.2) require Federal agencies to review and comment on environmental impact statements (EIS) for proposed actions within their expertise or jurisdiction. Throughout another agency's NEPA process, Fish and Wildlife Service (Service) review activities should focus on clear, meaningful analysis of significant environmental issues. The Service should assist a lead agency in making a reasoned decision consistent with the purpose, objectives, and goal of NEPA. Better EISs, in and of themselves, are not the goal of NEPA nor of Service involvement in the NEPA process. The goal of NEPA is better environmental decisions.
- B. Other Federal agencies should provide the Department of the Interior's (DOI) Office of Environmental Policy and Compliance (OEPC) with sufficient copies of environmental and other project review documents to allow distribution of the documents to the Service and other DOI bureaus being requested to participate in the review. When necessary, Service reviewing offices may remind other Federal agencies or State offices which prepare and distribute environmental documents to provide appropriate copies to OEPC. Normally, other Federal agencies should provide the following number of copies to OEPC.
 - (1) Twelve copies of a draft and six copies of a final document for projects in the Eastern United States, including Minnesota, Iowa, Missouri, Arkansas, and Louisiana. The same number of copies should be provided for projects in America Samoa, Guam, Hawaii, Puerto Rico, and the Virgin Islands.
 - (2) Eighteen copies of a draft and nine copies of a final document for projects in the Western United States westward of the westward boundaries of Minnesota, Iowa, Missouri, Arkansas, and Louisiana.
 - (3) Eighteen copies of a draft and nine copies of a final document for review requests which are national in scope, such as agency regulations, scientific reports, special reports, program plans, and other interagency documents.
 - (4) Sixteen copies of a draft and eight copies of a final document for projects in Alaska.
- C. When Service field offices receive other agency environmental documents directly from that agency instead of through transmittal from OEPC, they should advise the Service's Division of Habitat Conservation (DHC) (Attention: Environmental Review Technician) and OEA staff to ensure the document will be distributed by the Department for formal review. Service field offices should reply, in most cases, through formal Departmental review channels and not directly to the other agency.

- D. Service reviews and comments on other agency environmental documents should accomplish the following objectives.
- (1) Encourage agencies to contribute to the maintenance and enhancement of fish and wildlife values during their actions.
 - (2) Assure that all potential beneficial and adverse effects of a proposed action are recognized by the lead agency, and are understandably presented to the general public and decision makers.
 - (3) Assure that practicable alternatives less damaging to fish and wildlife resources are adequately described, realistically evaluated, and adopted where feasible.
 - (4) Assure that mitigation measures to offset unavoidable losses are adequately developed and included as part of the preferred alternative. Service mitigation recommendations and comments on other agency mitigation plans should be consistent with 501 FW 2, Service Mitigation Policy.

3.2 Administrative Procedures.

- A. Department's Office of Environmental Policy and Compliance (OEPC)
- (1) OEPC, under the Assistant Secretary for Policy, Management, and Budget (AS/PMB), is responsible for managing and coordinating DOI review of environmental documents and other project reviews (112 DM 4). One of OEPC's primary responsibilities is to ensure that a consolidated, single, consistent DOI response is prepared for Departmental signature. In addition to the Washington Office staff, OEPC has Regional Environmental Officers (REO) that handle many regional problems, serve on interagency task forces and regional commissions, and are authorized to sign DOI NEPA comment letters to other agencies on items of mainly regional concern. OEPC receives draft final EISs from Federal agencies outside DOI and assigns them for review to those DOI bureaus having jurisdiction or special expertise regarding a proposed action and its impacts.
 - (2) OEPC also receives and distributes for review various other environmental documents, such as environmental reports, proposed regulations, and Department of Transportation section 4(f) statements. OEPC does a preliminary review of the documents and determines which bureau, by virtue of jurisdiction or special expertise, will be "lead," that is, will have the responsibility of consolidating bureaus' comments into a single response for signature of either the REO or OEPC. In some cases the lead is retained by OEPC, and bureau comments are consolidated in Washington by OEPC staff for OEPC or AS/PMB signature.

B. Service Environmental Coordination Activities. Specific Service redelegations to the Assistant Directors and Regional Directors are described in 032 FW. DHC has been delegated the responsibility for assigning lead

within the Service for review and comment on OEPC-controlled documents. If it appears that an error in assignment has been made, or that another Service office has more expertise and should have been assigned lead, DHC should be contacted immediately. DHC will make all to reassignments.

Reassignments will be coordinated with the Service's Regional Environmental Coordinators (REQ and other appropriate Service entities. OEPC-controlled documents received in DHC will normally be processed and mailed to the Region and field office within one working day's time. Environmental documents which require a response in less than two weeks are normally transmitted to the Region and field offices by "overnight" mail, fax, or by an appropriate form of electronic transmission.

C. Lead Bureau.

- (1) The DOI bureau having either greatest expertise or jurisdiction by law for an action proposed by another Federal agency is designated lead bureau. The lead bureau is determined by OEPC. When OEPC designates the Service as lead bureau, it has responsibility for preparing DOI's response. Either the Regional Office or the Director of the Fish and Wildlife Service (Director) can be responsible for collating-comments, as described in 505 FW 3.2. This responsibility is indicated in the OEPC memorandum and/or the Ecological Services (ES) transmittal. The ES transmittal will provide the necessary instructions. DHC or another designated Division will collate bureau comments when the Director is assigned lead by OEPC.
- (2) If conflicting bureau positions cannot be resolved on a proposed project, resolution will be made by either the Department's REO or by OEPC, in consultation with the Service and the other involved bureau(s). When the Service, as lead bureau, prepares the collated DOI response for the REO's or OEPC's signature, the original of each bureau's comments and/or notes of phoned comments or "no comments must accompany the letter.

D. Lead Service Region. When projects cross Regional boundaries or otherwise involve more than one Region, the Assistant Director - Ecological Services (through DHQ will collate and submit the Service's response. If a proposed action has potential site-specific impacts, the document is sent for review to the responsible Region and Service field office. If two or more field offices are involved, lead is assigned to the one responsible for the geographic area in which the greatest potential impact may occur. Unresolved differences on the Service position between Regions will be resolved by the Director.

E. Programmatic or National Reviews. For proposed actions having national impacts or for programmatic statements, DHC will assign review and comment responsibility to the Service's Washington Office division or unit with the necessary expertise.

F. Noncontrolled Reviews. Environmental documents and other project reviews prepared by other DOI bureaus may be received by Service field

offices directly from the preparing bureau or from DHC. If the preparing bureau sends a copy to DHC, DHC will control it with an "EC" number. Other site-specific bureau-prepared environmental documents received directly by Service field offices may be commented on directly from the field level or as per Regional Office instructions. Copies of noncontrolled review comments should be sent to DHC. OEPC does not control bureau-prepared environmental documents and other project reviews, with the exception that it has review and approval responsibilities over all non-delegated EISS. DOI Environmental Statement Memorandum 85-2 describes these procedures (refer to Service NEPA Reference Handbook).

G. Advance Copies. Regional and field offices often receive courtesy or advance copies of official draft or final EISs, project plans, section 4(f) statements from non-DOI agencies, or other documents which are being circulated for formal review. The advance copy will allow additional review time between receipt of the official controlled copy and transmittal from DHC. ES transmittal instructions for review and comment should come from DHC in approximately one week (to allow for OEPC and DHC processing and mail delay). If such instructions are not received, or if the reviewer has reason to believe the action agency has failed to submit the document to DOI for review, DHC should be notified immediately. The field and Regional Office review should continue and the comments should be processed as if they were controlled.

H. Technical Assistance.

- (1) Other agencies and bureaus are encouraged to consult with Service field offices during early planning for technical assistance to help ensure full consideration of fish and wildlife resources. Requests for technical assistance and planning documents received as part of cooperating or scoping efforts are to be reviewed at the field level with comments sent directly to the agency. This includes review of preliminary or working draft EISs, other draft environmental documents, and other draft project reviews. DHC should be advised, by copy, of significant or controversial issues.
- (2) When reviewing documents that may become part of an EIS or project plan, the agency should be reminded that such informal coordination is rendered as technical assistance, and does not represent the final position of DOI. Some requests for technical assistance are routed through DOI and controlled by OEPC. These requests are generally responded to directly by the Service field office.

I. Processing Environmental Review Documents.

- (1) Environmental documents received by OEPC from other Federal agencies are processed in the following manner.

- (a) OEA assigns an "ER" control number to the document and routes it to DOI bureaus, via an OEPC memorandum.
 - (b) DHC receives the OEPC memorandum and prepares an ES environmental Review Distribution transmittal and routes the transmittal and the document to reviewers, with information copies, as appropriate.
 - (c) ES field office (or other appropriate office) does site specific review and prepares a comment letter for Regional Director's signature (unless otherwise directed by ES transmittal).
 - (d) Regional Directors review field office comments, sign comment letters, and forward comment letters to lead bureau, REO, OEPC, or Service Washington Office, as indicated in the ES transmittal, with copy to DHC.
 - (e) DHC coordinates comments directed through the Washington Office with other appropriate Service entities.
 - (f) Lead bureau prepares consolidated DOI letter for REO's signature.
 - (g) OEA prepares consolidated DOI letter for OEPC or A/S PMB signature.
 - (h) Lead Federal agency receives DOI comments.
- (2) Service comments on DOI (bureau) environmental documents received by DHC are generally signed at the Regional or field office level and are processed as follows.
- (a) DHC assigns an "EV control number, prepares ES transmittal, and routes to the Service reviewer.
 - (b) ES field office (or other appropriate office) prepares site-specific review and prepares a comment letter for the Regional Director's signature, unless otherwise instructed.
 - (c) Regional Directors review field office comments, sign comment letters, and forward comments directly to lead bureau, with copy to DHC.
 - (d) Lead bureau receives Service's comments.

J. Signature Levels. In general, OEPC's instructions for processing review comments are duplicated on the ES transmittal. Unless instructed otherwise by the Department, signature levels are consistent with 032 FW and 505 FW 1.6.

K. Review Deadlines/No Comments.

- (1) EISs and some other environmental documents have time periods set by law or regulation during which other agencies and the public may provide comments. CEQ's NEPA regulations (40 CFR 1506.10) require a minimum of 45 days for review and comment on draft EISs and a 30-day waiting

period following release of final EISs. However, Federal agencies may choose to adopt longer, but not shorter, routine time periods. The time period is calculated from the date the Notice of Availability (NOA) is published by the Environmental Protection Agency (EPA) in the Federal Register. The comment due date is provided in these notices. Time periods for draft and final revised or supplemental EISs are calculated the same as for draft EISs and final EISs. CEQ's NEPA regulations require agencies with jurisdiction by law or special expertise to comment or reply that they have no comments, within the time period specified (40 CFR 1503.2). The action agency is under no legal obligation to consider comments received after the established time period expires. To ensure that other agencies give full consideration to Service concerns and comments, reviewers must meet the deadlines given in the ES transmittal.

- (2) If the Service is a cooperating agency, or if the Service has otherwise been a participant in the scoping process for a proposed action, review of the draft EIS is needed only to the extent that it ensures our concerns have been correctly addressed.
- (3) When controlled documents arrive for review, they should be quickly scanned to determine deadlines and relative priority, and the review should be assigned immediately. If the immediate determination indicates a low priority and a potential for a "no comment" response, the reviewer should follow through with a quick reply.
- (4) "No Comments" on draft EISs and on proposed Chief's Reports must be made in writing.
- (5) Field office review schedules should ensure that intermediate offices such as the Regional Office, lead collating bureau, REO, OEPC, DHC, and other appropriate Washington Office entities are allowed adequate time to briefly review proposed comments. Potential mail delays and holiday and weekend "down time" should be factored in both DHC's mail schedule and the reviewer's schedule, to the extent possible. DHC shall ensure that the most expeditious mailing system is used, to include routine use of daily bulk "overnight" mail to the Regions, faxed copies, and other appropriate electronic mail transmission, as warranted.

L. Extensions of Time. Organizational responsibilities for meeting deadlines and for requesting extensions of time are described in 505 FW 1.6.

- (1) Extensions of review deadlines will occasionally be needed because of unusual routing or mail delays, required field studies, necessary coordination with other Federal or State

agencies, or the discovery of unforeseen problems with the proposed action. The need for any extension must be determined early in the review process and should be requested not later than three days after receipt of the controlled document. The nearer the deadline, the more difficult it is to obtain extensions. An extension should be requested only when it is expected that substantive comments will be made, or substantive field inspection or coordination is needed. It is usually not appropriate or possible to get an extension on a final EIS unless needed in an attempt to avoid CEQ referral.

- (2) Extensions of time on OEPC-controlled documents must be made in a request to the lead Federal agency. Unless otherwise directed, this is done by DOI (OEPC or REO, as appropriate).
- (3) Extensions of time will be negotiated by the REC with OEPC or the REO, as appropriate. Extensions of one week or less can generally be requested and confirmed verbally. Requests for extension in excess of two weeks must be made in writing for DOI confirmation to the action agency. This letter request will be prepared and processed by DHC. However, the requesting field office must be prepared to offer explicit justification for lengthy extensions. Some examples of good reasons are the need to attend public meetings scheduled after the comment due date or the need for additional coordination with State resource agencies. The Washington Office Environmental Coordinator will notify the REC as soon as the extension has been granted or denied.
- (4) To obtain an extension of the date due to a DOI lead bureau, such as the National Park Service, the REC should request an extension directly from the lead bureau.
- (5) The REC will negotiate extensions through the REO when the Regional Office has the lead in collating bureau's comments for the REO's signature.

M. DOI Comment Letters. DOI review comments are signed by OEPC or AS/PMB in the Washington Office or by the appropriate REO.

- (1) Copies of signed letters are forwarded to DHC. DHC provides the appropriate Regional and field offices with copies of Departmental letters signed at the Secretarial level in Washington. It is important that Service offices retain these letters for future use, as they indicate the Service and/or DOI position on the project. DHC maintains the Service's administrative record of all Service responses to DOI and Federal agencies on controlled environmental reviews. Regional and field offices should maintain similar

files for controlled environmental reviews within the scope of the Region.

- (2) Service personnel should compare these letters with the comments submitted. The preparer and/or REC should question any substantial changes in Service comments made by OEPC or a lead bureau that were not coordinated.

3.3 How to Review Environmental Documents.

- A. Service personnel responsible for reviewing an environmental document will normally have had previous experience with the proposed action by participating in the scoping process, representing the Service as a cooperating agency, authoring planning aid letters or formal Fish and Wildlife Coordination Act (FWCA) Reports, or through consultation under the Endangered Species Act.
- B. Service reviewers must be extremely careful not to foreclose future options by declining to review and comment on environmental documents. Failure to review and comment on other agencies' draft EISs and other environmental documents can be interpreted by those agencies as meaning the Service has no concerns or believes that the proposed action will not have significant impacts on fish and wildlife resources. It can further be interpreted to mean that the Service will have no objections to issuance of any permits required for project construction.

C. Major Areas of Concern to be Addressed in Service Reviews of Environmental Documents.

- (1) Service comments and advice on environmental documents should be confined to items of Service jurisdiction and expertise and should be based on facts, published research, or professionally supported opinion.
- D. **Tiering.** CEQ's NEPA regulations (40 CFR 1502.20) encourage tiering EISs. Tiering, however, is not a substitute for the adequate assessment of site specific environmental effects. For example, a programmatic EIS must consider cumulative, direct, and indirect impacts; however, this may result in less detailed assessments of impacts than would be addressed on a site specific EIS.
- E. **Discussion of Inconsistencies with State and Local Plans.** CEQ's NEPA regulations [40 CFR 1506.2(d)] require an EIS to discuss any inconsistencies the proposed action may have with an approved State or local plan or law, and to address the extent to which the lead agency plans to reconcile its proposed action with the plan or law. Service comments on EISs should address key State and local planning efforts which have Service involvement in development, review, and/or approval. Some of these are listed below.

- (1) Management and habitat acquisition plans funded by Dingell-Johnson (D-J) and Pittman-Robertson (P-R),

Land and Water Conservation Act, section 6 (Endangered Species Act) cooperative agreements, or through other grant programs.

- (2) Coastal Zone Management Plans.
- (3) State and local wetland and flood plain management plans.
- (4) Coastal Barriers Resources Act, as amended.
- (5) Habitat conservation planning under section 10(a)(1)(B), recovery plans, and recovery actions, pursuant to the Endangered Species Act.
- (6) State water quality standards.

F. Service Reviews should be Total and Comprehensive.

- (1) EIS reviews should include consideration of total, long-term ecological impacts, including any direct and secondary (or indirect) impacts. Also, Service reviewers should consider any cumulative effects, or possible project segmentation which could mask cumulative effects.
- (2) The Service should provide consistent positions. Do not contradict earlier statements unless project alternatives, impacts, or conditions have substantially changed; or significant new data are available. Any significant change in Service position must be substantiated (justified) in writing.
- (3) Service reviews must represent the views of all Service program areas. Any uncompleted or unresolved reviews or consultations under other statutes must be indicated/summarized in the Service's comments.

3.4 Comments on Draft EISs. The Service should review and comment on an agency's draft EIS to ensure that fish and wildlife resources are adequately considered in their programs and plans. A sample DOI letter commenting on a draft EIS is found in the Service NEPA Reference Handbook. The following points should be considered.

- A. If a draft EIS is so inadequate as to preclude meaningful analysis, but it appears that there may be significant adverse effects on fish and wildlife resources, Service comments should state explicitly what would be required to make the document adequate. The action agency should be requested to prepare and circulate a revised draft EIS, in accordance with 40 CFR 1502.9(a).
- B. The Service should indicate which alternative is environmentally preferred from a fish and wildlife standpoint. The Service should make recommendations regarding each alternative to ensure that, whichever is selected, the lead agency is aware of necessary fish and wildlife measures that should be incorporated therein.

- C. Service comments on a draft EIS may request the action agency to prepare a supplement to the EIS if such an analysis will help to satisfy Service concerns. Requests for supplemental documents must be consistent with the criteria set forth in 40 CFR 1502.9(c).
- D. If there is any possibility that the Service may refer a project to CEQ (40 CFR 1504), that fact must be pointed out to the agency at the earliest possible time in their planning process. This normally occurs within the comment period for the draft EIS. 505 FW 4 provides specific guidance on CEQ referrals.
- E. Submit all comments to the appropriate collating office. Do not bypass DOI by submitting comments directly to the requesting Federal or State agency.
- F. Service comments should not be released prior to DOI's release of the official Departmental position.

3.5 Comments on Final EISs. CEQ's NEPA regulations [40 CFR 1502.9(b)] require lead agencies to respond to comments made on the draft EIS-and require discussion of responsible opposing views at appropriate points in the final EIS rather than merely appending comments to the document.

- A. The Department does not normally comment on final EISs. In other words, the quality review of the document itself should be completed prior to release of the final EIS. "No Comment" responses are not normally required, unless requested on the ES transmittal. The Service comments on final EISs when there are major, unresolved issues about the project itself. For example, the Service may oppose the project or a feature of major importance relative to fish and wildlife resources. A sample DOI letter commenting on a final EIS is found in the Service NEPA Reference Handbook. Generally, comments on a final EIS are justified when one or more of the following criteria occur.
 - (1) The Service strongly objects to the selected alternative because it is environmentally unacceptable from the Service's expertise or jurisdictional standpoint, or it fails to incorporate Service recommendations for mitigation or monitoring requirements as an integral part of the project.
 - (2) Project modifications proposed since the draft EIS require further comment. This is especially important if the modifications significantly affect the impacts or the analysis of those impacts on fish and wildlife resources, will effect endangered species, or if new permit activities could be involved.
 - (3) There is a need to correct the record because there has been a serious failure on the part of the action agency to understand significant Service comments on the draft EIS and that failure is the basis for our opposition to the project or specific project features.

- (4) Important new information which would be consequential to the decision making process is available, or erroneous or obsolete data are presented in the final EIS which could significantly affect fish and wildlife resources.
- B. If DOI's comments on the draft EIS included "may refer to CEQ" language, but the Service/DOI decided not to refer, DOI's comments on the final EIS should address the reasons for not referring (e.g., major issues were resolved).
- C. Service comments on a final EIS should state what the Service specifically wants the lead agency to address in its Record of Decision to rectify the Service's concerns. For example, the Service could ask that specific mitigation measures or the results of section 7 consultation be addressed in the Record of Decision, if not previously included in the selected alternative.

3.6 Format for Comments on Draft and Final EISs.

- A. Service comments should be organized to reflect the different statutory review requirements on the document being reviewed. For example, Service comments should be separated as follows: "Environmental Impact Statement Comments," "Section 4(f) Statement Comments," "ENDANGERED Species Act Comments," "Fish and Wildlife Coordination Act Comments." The latter two sets of comments should only address statutory requirements, such as section 7 consultation or the FWCA report.
- B. Regarding Service comments on a draft EIS, the comments should generally be organized in two sections: "General Comments" and "Specific Comments." A "Summary Comments" section may also be included when the review comments are lengthy. When commenting on final EISs, these sections are usually not indicated since the comments generally address only major unresolved issues regarding the project. The sections are described below.
- C. General Comments.
 - (1) This section should summarize Service concerns with the adequacy and accuracy of the document and present comments of a general nature. The comments in this section should concentrate on the recommended or selected alternative and its impacts. Any previous technical assistance, reports, or planning aid letters provided by the Service on the project should be noted in this section (and attached), if appropriate. For example, Service comments should note any potential reviews that it may make in conjunction with section 10/404 Corps of Engineers permits, any further consultation requirements under section 7 of the Endangered Species Act, and whether the Service may refer the project to CEQ. Other project reviews are addressed in 505 FW 4. CEQ referrals are discussed in 505 FW 5.

- (2) If the document is complete in its analysis of potential impacts on fish and wildlife resources of the proposed action and reasonable alternatives, and if the proposed action is acceptable, a simple statement of that fact should be made.

D. Specific Comments.

- (1) Specific comments should support each of the major concerns raised in the "General Comments." In other words, the action agency should be able to locate and identify the specific justifications for the major problems addressed in the "General Comments" section. Other comments to rectify inadequacies on how fish and wildlife resources are addressed in the EIS are also covered in this section.
- (2) The format of this section should follow the organization of the document being reviewed. Page and paragraph numbers should be cited to improve the usability of the comments. The comments should be written in a constructive tone to help the author of the document modify the next draft or final work. State the problem with specificity rather than a general description of inadequacy. Most importantly, specifically state what needs to be done to rectify the deficiency. Give your precise recommended additions and deletions. As 40 CFR 1503.3 points out, when we choose to criticize a lead agency's predictive methodology we should describe not only the methodology we prefer, but why.
- (3) Comments should address significant impacts of the proposed action that may have been overlooked or downplayed. The comments should also be made to assure that alternatives that would benefit or have fewer adverse impacts on fish and wildlife resources be included and adequately presented. Comments on the description of the environment or environmental setting should be made only if a particular component of the environment that will be significantly impacted is not described.

E. Summary Comments. When the review comments are lengthy, it may be useful to summarize the Service's major concerns and recommendations for rectifying those concerns in this section. Whenever appropriate, this section should close with an offer by the Service to meet with the agency to discuss the Service's comments and concerns. This offer of continued cooperation and assistance is especially important if significant resources are involved or if there are extensive Service comments too difficult to

thoroughly describe in a letter. Specific contacts by titles, addresses, and telephone numbers should be provided.

- F. **Collated Responses.** The above format should be used when collating' comments from other bureaus into a Departmental response. However, if lengthy comments are provided by more than one bureau, the comments by the other bureaus can be presented separately within the Departmental response, as long as there are no inconsistencies or differing positions. Differing positions should be resolved between the bureaus. Unresolved issues between bureaus will be resolved at the RED or OEPC level, as appropriate. The Departmental response should be a unified, single consistent response.

3.7 Style for Comments on Draft and Final EISs. Service comments must be clear, specific, succinct, and based on facts, published literature, and expert opinion. Literature sources should be referenced when possible.

- A. Presenting a complete, factual analysis is important to convincing the action agency to adopt the Service's recommendations. The tone of the comments should be constructive, objective, and professional. Comments should not contain extraneous information or excessive quotes from the document, have unnecessary descriptions of the proposed action, or give detailed descriptions of the affected environment, or offer unsupported conclusions. Further studies or information should only be requested when necessary for adequate evaluation of the proposed action or alternatives.
- B. Do not use a question when commenting. Instead, clearly state the problem and the recommended solution.
- C. If the comments are to be ultimately signed by the Secretary, RED, or another official in DOI, do not refer to the Service in the first person. Never use the word "I." You may use phrases such as "The Service suggests," "the Service has advised the Department," etc. Also, be careful not to preempt the Secretary's signature prerogatives. Be clear as to whose position you are referring to. For example, state whether it is a DOI position or a Service position. If you are unsure, assume the latter.