

Legal Implications of Local Legal Products Formed Without a Problem Inventory List (DIM)

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Abstract: This research is motivated by problems within the local legislative system in Indonesia, where the Problem Inventory List (DIM), a crucial quality control instrument at the central level, loses its regulatory footing at the regional level. This study aims to analyze the institutionalization of DIM in lawmaking and the legal implications of its absence in drafting Local Regulations. Employing a normative juridical method with a statutory approach, the results indicate that at the central level, DIM is an imperative requirement regulated hierarchically (Law No. 12/2011, MD3 Law, and DPR RI Regulation No. 2/2020), where its absence automatically halts deliberations. Conversely, a regulatory vacuum exists at the regional level since Government Regulation No. 12/2018 and Minister of Home Affairs Regulation No. 80/2015 do not mandate it. Consequently, while its absence does not formally invalidate Local Regulations, methodologically it eliminates structural discipline during sessions. Implicatively, this absence triggers substantive issues like policy smuggling, redundant terminology, and fragile considerations clauses, leading to massive corrections by central ministries during evaluations and declining legislative functions within the Regional House of Representatives (DPRD).

Keywords: DIM, Problem Inventory List, Local Legal Products, Local Regulations.

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1. Introduction

Lawmaking refers to the creation of legislation encompassing the stages of planning, drafting, discussion, ratification or enactment, and promulgation, as regulated under Law of the Republic of Indonesia Number 12 of 2011 concerning the Formation of Legislation (Fadli, 2018). . The formation of Local Regulations (Perda) stands as one of the primary pillars in implementing regional autonomy, aimed at providing legal certainty, regulatory effectiveness, and responsiveness to local community needs. Based on Law Number 12 of 2011 concerning the Formation of Legislation, local regulations constitute a form of legislation hierarchically positioned below National Laws (Hasani, 2020). Consequently, their formulation mechanism must ensure quality, consistency, and alignment with the principles of good legislation.

Consequently, its formulation mechanism must ensure quality, consistency, and alignment with the principles of good legislation (Nopliardy, 2017). Consequently, its formulation mechanism must ensure quality, consistency, and alignment with the principles of good legislation (Sulaeman & Gustiadi, 2023). Fundamentally, there is no difference between the formation of National Laws and Local Regulations as both encompass the same five stages (Asshiddiqie, 2020).

The process of forming National Laws (UU) in Indonesia must go through two levels of discussions, where the First-Level Discussions require the deliberation of a Problem Inventory List (DIM) as a mandatory instrument that reflects the principle of checks and balances; thus, without it, legislative deliberations cannot proceed due to the loss of the subject matter of discussion (Dalimunthe, 2018). However, this condition differs from the formulation of Draft Local Regulations (Raperda), which is more general and experiences a regulatory vacuum because the DIM has not been adopted as a mandatory and binding instrument in regional regulations, such as in Government Regulation Number 12 of 2018 and Minister of Home Affairs Regulation Number 120 of 2018. This regulatory asynchrony ultimately creates legal uncertainty regarding the status of the DIM at the regional level whether it is imperative as a formal prerequisite for procedural validity or merely facultative and eliminates the standard baseline that serves as the intellectual foundation for formulating strategic issues and proposed norm changes in a structured manner between the DPRD and the Regional Government (Syam et al., 2025).

Based on data obtained on December 1, 2025, from the Legal Bureau of Jambi Province, it is revealed that provisions regarding the Problem Inventory List (DIM) are almost entirely un-regulated within the Internal Regulations (Tata Tertib) of the Regional House of Representatives (DPRD). Although the realization rate of forming Local Regulations in several regions, such as Jambi City and other regencies, reached 100%, all of these legal products were finalized without a discussion mechanism based on a Problem Inventory List (DIM). This phenomenon demonstrates a significant gap between quantitative legislative achievements and qualitative procedural compliance. The absence of DIM in local parliamentary rules indicates that local legislative functions prioritize administrative targets over structured substantive debates, potentially compromising the comprehensive scrutiny of local policies.

The phenomenon occurring in Jambi Province indicates a significant gap in local legislative practices due to the legal ambiguity surrounding the position of the Problem Inventory List (DIM) in the formation of local regulations. This condition raises a fundamental question regarding the ideal coordinates for the DIM's position: should it function from the outset as a pre-legislative instrument accompanying the Academic Paper (Naskah Akademik) during the planning stage (needs analysis), or is it an

independent working tool that must be available as an absolute prerequisite during the First-Level Discussions at the Special Committee (Pansus) level? This positional uncertainty creates procedural ambiguity, if placed too early, clause-by-clause discussions with the executive risk becoming unfocused, whereas if omitted from the First-Level Discussions, the DPRD loses its primary control instrument to exercise checks and balances over proposed norms. Consequently, this structural ambiguity not only complicates the legislative workflow but also weakens the institutional capacity of local parliaments. Without a clear and binding procedural framework, the debate over draft regulations prone to shifting from a systematic legal assessment into political transactions, ultimately undermining the substantial quality of the enacted local legal products.

Such ambiguity ultimately triggers a profound disharmony between legislative mechanisms at the central level and regulations at the regional level. While the deliberation of a DIM in National Draft Bills at the central level is viewed as an essential prerequisite to guarantee the quality of legal norms, the absence of a similar mechanism at the regional level is feared to have a detrimental impact on the quality of the resulting legal products. Furthermore, it raises critical questions as to whether this absence potentially leads to procedural defects in the formation of Local Regulations. Ironically, amidst these significant potential legal impacts, many regions have not regulated the inclusion of a DIM in drafting Local Regulations, and there remains a lack of extensive studies or in-depth understanding regarding the exact and proper legal position of the DIM within the regional legislative framework.

Based on the aforementioned problem context, this study is intended to focus on a normative analysis to elaborate on the legal standing of the Problem Inventory List and its juridical consequences. If the Problem Inventory List is an instrument that supports a participatory and accountable legislative process, then ignoring this mechanism in Local Regulations could be considered a violation of the principles of good legislation. Specifically, the research questions of this study are as follows: 1) What is the legal standing and discussion mechanism of the Problem Inventory List (DIM) in the Formation of Local Legal Products? and 2) What are the legal implications for the validity of local legal products formed without going through a Problem Inventory List (DIM) mechanism?.

2. Method

This research employs a normative juridical method, a legal research methodology focusing on normative steps and legal concepts to explain, discover meaning, and evaluate the law. According to Bahder Johan Nasution, this type of research does not require social data or empirical facts; rather, it relies entirely on legal materials as its primary object of study (Nasution, 2008). The research approaches applied in this study

are the statutory approach and the conceptual approach. The primary legal sources utilized include the 1945 Constitution of the Republic of Indonesia; Law Number 12 of 2011 concerning the Formation of Legislation, as amended by Law Number 13 of 2022 concerning the Second Amendment to Law Number 12 of 2011 concerning the Formation of Legislation; Law Number 23 of 2014 concerning Regional Government, as most recently amended by Law Number 6 of 2023; Government Regulation Number 12 of 2018 concerning Guidelines for Drafting Internal Regulations of Provincial, Regency, and Regional Houses of Representatives; Minister of Home Affairs Regulation Number 80 of 2015 concerning the Formation of Local Legal Products, as amended by Minister of Home Affairs Regulation Number 120 of 2018; House of Representatives (DPR RI) Regulation Number 1 of 2020 concerning Internal Regulations, as amended by DPR RI Regulation Number 1 of 2025; and DPR RI Regulation Number 2 of 2020 concerning Procedures for Law Drafting. Additionally, secondary legal materials comprise legal and non-legal opinions obtained from books, journals, internet sources, previous research findings, legal principles, doctrines, legal facts, and other relevant sources.

3. Result & Discussion

3.1. The Legal Standing and Discussion Mechanism of the Problem Inventory List (DIM) in the Formation of Local Legal Products

The theory of the rule of law, *rechtsstaat*, *nomocracy*, or *negara hukum* is a concept of state governance based entirely on law. Every action taken by state administrators must be grounded in the applicable laws. In other words, whatever is to be executed within the context of state governance must be based on the rules of the game (Manurung et al., 2025). The procedural law of lawmaking in Indonesia is strictly designed to institutionalize a substantive dialectic of thoughts between state institutions and to minimize substantive defects in legal products resulting from rushed or merely formalistic processes. Within this framework, the Problem Inventory List (DIM) occupies a central position as a roadmap containing responses, views, and proposed amendments from both the government and factional caucuses within the House of Representatives (DPR), while simultaneously embodying the principle of an equal, reciprocal working relationship between the DPR, the President, and the Regional Representative Council (DPD). In addition to serving as the primary instrument for inter-institutional legislation, the institutionalization of the DIM also functions as a channel for civil society contributions such as community organizations, mass media, pressure groups, and affected public figures to convey meaningful participation by submitting written texts in the form of counter-drafts or the DIM itself regarding the draft regulation being discussed (Toloh, 2024).

The legal standing of the Problem Inventory List (DIM) at the central level is underpinned by a strong and imperative hierarchy of legislation. The regulation

governing the institutionalization of the DIM is hierarchically binding, spanning from statutory-level provisions such as Law No. 12 of 2011 (as amended by Law No. 13 of 2022) and the MD3 Law, down to internal parliamentary rules such as DPR RI Regulation Number 1 of 2020 and Number 2 of 2020. The provision of Article 68 of Law Number 12 of 2011 reaffirms the operation of the principle of reciprocity that binds the checks and balances function among state institutions, wherein the drafting institution is not permitted to evaluate its own text but must instead be assessed in writing by its partner institution through the reciprocal submission of a DIM.

Although Law Number 12 of 2011 does not explicitly contain a suspension sanction clause, in positive legal practice, the absence of this document can automatically paralyze all stages of parliamentary deliberation (Pshk.or.id, 2019). Pursuant to Article 50 paragraph (2) of Law Number 12 of 2011, there is a 60-day deadline for the President to submit the Presidential Letter (Surpres) along with the DIM upon receiving the DPR's initiative draft. If the DIM document fails to be submitted, the substantive deliberation of the Draft Bill is bound to stagnate due to the loss of a shared comparative object between institutions, which positions the DIM as an absolute prerequisite for the legality of continuing legal deliberations in parliament (Syam et al., 2025).

Technically, the rigid matrix format of the DIM is not regulated in the appendix of the Law on the Formation of Legislation (UU P3) but has instead evolved within legislative practice and was subsequently adopted into the Internal Regulations of the DPR. Based on DPR RI Regulation Number 2 of 2020, this format is designed to direct deliberations immediately toward the substance of the draft regulation in a sequential manner, from the Title down to the clause-by-clause Explanation. The feedback contained within the DIM matrix encompasses a comprehensive mapping of positions, ranging from approvals of original formulations, proposed textual revisions, recommendations for adding articles or paragraphs, rejections, to requests for clarification regarding ambiguous clauses (Syam et al., 2025).

The institutionalization of this DIM-based mechanism methodologically transforms boardroom debates from being merely ceremonial-political into substantive, focused, and structured discussions. This phase constitutes the heart of the legislative process (Sugiman, 2017). Through this mechanism, the dynamics of legal arguments and political compromises are accountably documented, which not only guarantees public transparency regarding the logical ratio behind the formation of a norm but also serves as a foundation for knowledge development (Syam et al., 2025).

To reaffirm its legal standing, a methodological critique is directed at previous literature that failed to define the DIM independently, instead conflating it with early research documents or Academic Papers (Syam et al., 2025). An Academic Paper is a scientific research-based document utilized during the planning phase to ground sociological

and philosophical urgency, whereas the DIM holds a specific legal standing that only arises during the deliberative stage. The existence of the DIM as a deliberative instrument places it as an inseparable part of substantive procedural law that must be executed in the First-Level Discussions (commission or Special Committee meetings) through introductory consultations, DIM deliberations, up to the submission of minifaction opinions, before proceeding to the Second-Level Discussions in the plenary session.

Overall, the core essence of institutionalizing the Problem Inventory List (DIM) within the legislative system lies in its standing as an imperative, independent, and absolute substantive procedural law that guarantees the viability and validity of lawmaking procedures. Unlike an Academic Paper, which serves as a research baseline during the planning stage, the DIM is a deliberative working document utilized during the discussion phase that institutionalizes substantive dialectics, maintains the balance of power (checks and balances), and provides a channel for meaningful public participation. Consequently, the absence of explicit and binding regulations governing the DIM at the regional level not only triggers a regulatory vacuum and legal uncertainty but also has the potential to produce local legal products that suffer from procedural defects and lack a structured intellectual foundation.

The absence of standardized regulations regarding the mandatory use of a Problem Inventory List (DIM) in the deliberation of Draft Local Regulations (Ranperda) triggers a significant juridical contradiction between central and regional legislative practices. This regulatory vacuum extends from umbrella legislations, such as Law Number 12 of 2011 and Law Number 23 of 2014, down to the complete omission of the phrase "DIM" within Government Regulation Number 12 of 2018 concerning Guidelines for Drafting Internal Regulations of the DPRD, as well as its technical implementing regulations, namely Minister of Home Affairs Regulation (Permendagri) Number 80 of 2015 jo. Permendagri Number 120 of 2018. Theoretically, viewed through Hans Kelsen's Stufentheorie as developed by Hans Nawiasky concerning the hierarchy of legal norms, the lack of an institutional anchoring for the DIM at the central level automatically replicates a similar vacuum at the regional level (Attamimi, 1990). Consequently, the majority of Regional Houses of Representatives (DPRD) in Indonesia lack a compelling national standardization, thereby treating the deliberation phase within the Special Committees (Pansus) and the Local Legislation Bodies (Bapemperda) merely as mechanical and ceremonial formal forums (Syam et al., 2025).

3.2. The Legal Implications for the Validity of Local Legal Products Formed Without a Problem Inventory List Mechanism

The absence of a Problem Inventory List (DIM) mechanism within the procedural law of local lawmaking does not merely transform courtroom atmospheres into ceremonial events; rather, it carries destructive legal implications for the substantive quality of the enacted norms. The quality of a local regulation's material content is heavily determined by the precision of lawmakers in scrutinizing philosophical, juridical, and sociological aspects from the moment the initial draft is formulated. The lack of a mandatory DIM document at the regional level results in the loss of an early filtering instrument capable of identifying potential substantive defects, regulatory overlaps, and technical drafting errors. Consequently, the DPRD and the Regional Government frequently pass fragile draft regulations that contain highly fatal substantive flaws.

The first legal implication of the absence of a DIM targets the most fundamental part of a regulation's anatomy, namely the imprecise drafting of the "Bearing in Mind" (Mengingat) Legal Basis. The legal basis serves as an anchoring of legality that determines whether a Local Regulation possesses a valid delegation of authority from superior national laws. Without the discipline of compiling a DIM by DPRD factions, drafting teams tend to include all laws non-selectively merely to fulfill administrative formalities. The tangible impact of this lack of filtering is clearly affirmed in the Discussion Matrix Document of the Draft Local Regulation concerning the Provision of Incentives and/or Conveniences to the Community and/or Investors. In the initial draft, the region included up to 30 legislative provisions within the "Bearing in Mind" legal basis. This high regulatory inflation proves that at the pre-discussion stage, there was no critical instrument like the DIM to compel factions to filter the vertical relevance of regulations. Consequently, upon entering joint discussions, this legal basis had to be drastically reduced to only 4 provisions, as the other 26 laws were deemed to have absolutely no direct connection with the delegation of investment authority in the region.

As fulfillment of authentic state evidence regarding how the absence of a DIM produces massive substantive defects that are subsequently overhauled by the Ministry of Home Affairs, the following section highlights 4 Local Regulations (Perda) that demonstrate the low quality of regional legislation due to the lack of a filtering document at the local level. In the case of Jambi Province, the redundant terms found in Article 1 of the General Provisions reflect how draft regulations are compiled without the logical legal discipline required in lawmaking. At the central level, this model of definitional error would certainly be eliminated during the First-Level Discussions because every political party faction is obligated to fill out the DIM response column to question the operationalization of a legal term. However, because the Jambi Province DPRD does not recognize a mandatory DIM mechanism, the draft containing the redundant definitions passed without any special committee members noticing the internal

inconsistency of the text, until it was ultimately and embarrassingly expunged by the central ministry.

A far more dangerous impact resulting from the absence of a DIM is vividly illustrated in the facilitation document for Jakarta Province. The smuggling of a new policy in the form of financial relaxation within the second amendment draft constitutes a severe violation of legal drafting techniques. An amendment regulation is strictly restricted to modifying pre-existing clauses intended for refinement, rather than serving as a vehicle to introduce massive, new policies. The Jakarta DPRD Special Committee meetings lost the ability to detect this legal smuggling because it was not filtered by a screening mechanism like the DIM.

Meanwhile, the cases of Aceh Province and West Sulawesi Province confirm deep-seated structural issues within the methodological aspect of drafting the juridical foundation within the "Considering" (*Menimbang*) clauses. The failure of both regions to precisely formulate points (a) and (b) which consequently required the Ministry of Home Affairs to take over and completely rewrite them demonstrates that the quality of regional legislation lacks robust legal reasoning and methodological discipline. While the formal validity of these local regulations remains technically intact because regional positive law has not yet explicitly mandated a DIM as a procedural prerequisite, their substantive validity is heavily compromised and deemed legally weak based on the four aforementioned examples. This disparity underscores a dangerous conceptual separation in local lawmaking, where a legal product can be deemed legally binding merely by fulfilling superficial administrative checklists, despite harboring severe intellectual flaws in its normative construction. The fact that the central government must repeatedly intervene to correct basic legislative formulations indicates that without a structured instrument like the DIM to force early internal debate, local lawmakers are prone to producing legally fragile regulations that fail to meet the rigorous standards of comprehensive jurisprudence.

Another legal implication of the absence of a DIM is the occurrence of bureaucratic inefficiency and the squandering of regional financial resources. When a draft Ranperda which has consumed months of deliberation and absorbed significant regional budgets to fund hotel meetings and special committee comparative studies ultimately faces total rejection, a complete overhaul of its considerations, or radical clause revocations by the Ministry of Home Affairs, the entire regional legislative process becomes redundant. Regions are forced to reschedule legislative sessions or even restart the drafting process from scratch to comply with the central government's facilitation decree. These administrative and financial losses arise solely because regions lack an independent screening mechanism, such as a DIM document, capable of resolving substantive issues within their own domestic governance.

In line with the ideas presented by Fauzi et al., the implication of the absence of a DIM is the collapse of internal quality control functions at the regional level. Because Ranperda deliberations are largely dominated by ceremonial and unstructured processes, lawmakers fail to meticulously detect the substantive defects inherent in the initial executive drafts. Consequently, documents with congenital flaws such as non-selectively included legal bases, redundant general provisions, and policy distortion practices that violate jurisdictional boundaries can slip through to the joint approval stage without ever being filtered in regional boardrooms. The absence of a DIM for draft Perda also results in special committees never producing Meeting Minutes (which must contain the main points of discussion, conclusions, and/or decisions made during the meeting) or Special Committee Brief Reports (which must summarize the meeting's conclusions and/or decisions).

Ultimately, this weakness implies that the burden of quality control is systematically taken over by the Central Government, as the lack of an early filter like the DIM forces the Ministry of Home Affairs, through its e-Perda facilitation mechanism, to act as a highly repressive sole filter. This phenomenon demonstrates that regional legislative autonomy remains fundamentally fragile and dependent, given that regions lack a rational anchor to resolve substantive problems within their own domestic affairs. Consequently, this structural reliance effectively reduces the constitutional essence of regional autonomy which should inherently grant local governments the independence to govern and regulate their own affairs into a mere administrative extension of central authority. By allowing the central government to continuously overhaul local drafts due to internal procedural failures, local legislative bodies unwittingly surrender their normative sovereignty. Over time, this dynamic not only stifles legal innovation at the regional level but also perpetuates a paternalistic pattern of governance that undermines the democratization of local lawmaking in Indonesia.

4. Conclusion

The institutionalization of the Problem Inventory List (DIM) at the central level holds an imperative status and is strictly regulated through a tiered legal hierarchy, spanning from Law No. 12 of 2011 and the MD3 Law down to DPR RI Regulation No. 2 of 2020, wherein its absence automatically halts legislative deliberations to safeguard the principle of checks and balances. Conversely, a regulatory vacuum exists at the regional level because Government Regulation No. 12 of 2018 and Minister of Home Affairs Regulation No. 80 of 2015 fail to mandate the DIM; thus, from a formal-juridical standpoint, the absence of this document does not invalidate the legality of Local Regulations (Perda). Instead, it collapses the methodological structure and procedural discipline of DPRD sessions, reducing them to mere ceremonial-administrative exercises. Consequently, the elimination of this internal quality control allows various

substantive material defects to slip through such as the smuggling of unauthorized new policies, redundant terminology, and fragile "Considering" (*Menimbang*) clauses which ultimately forces the central government to conduct massive corrections and overhauls during the final evaluation phase. This systemic failure accentuates that without a binding local mechanism to replicate central legislative discipline, regional autonomy inadvertently breeds normative degradation. The absence of a regional DIM effectively shifts the burden of rigorous legal scrutiny entirely onto the central executive, thereby undermining the democratic essence of local co-legislation and transforming regional lawmaking into a highly dependent and legally flawed process.

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