



Setting out innovation guidelines in business: road map towards a fully innovating culture

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Good progress of our companies and organisations does not only require good day-to-day management but also developing a capacity to innovate on a permanent basis and in many areas of management. In the last ten years an important task of awarenessraising for innovation has been made and it is now time to devote our best efforts to implement innovation in an effective manner. Those not convinced that this is a top priority for any senior management team and board of directors should leave the task of forging the future of their company or organisation in somebody else's hands who has the commitment and the courage this urgent task requires.

Introduction

Over years, our companies have been implementing procedures and structures to improve what they had been doing so far. Important progress has been achieved as to regularity, efficiency and productivity. In a global setting this is currently not enough anymore. A quantum leap towards new methods in the key result areas of each company is now necessary. Besides, since the pace of competitive, social, economic and technological change is turning obsolete many patterns that were valid up to recently, it is necessary to renew periodically this key area (product, service, productivity, processes or the business model), which means a need to innovate in different areas of management within our companies and organisations.

The challenge lies in increasing our capacity to innovate and, if possible, to do it on an ongoing basis and in different management areas strengthening each other.

The challenge is to set up an orderly way of innovating, making headway towards a future of our choice that shall allow us to overcome current weaknesses – in the words of Luis Lara, chairman of Aranco, a Valencia packaging company that systematised innovation recently, «it is time now to innovate with method». Besides, it needs to be done without forsaking the results originated in good short-term management, keeping day-today business efficiency.

Innovating culture

Innovating means to introduce new ideas to add value for clients, society and the company itself. To many companies, relevant innovation is not the mere introduction of yet another new product

or service. As it is an important subject, especially for companies manufacturing consumer goods, this is not enough as this kind of innovation yields temporary results and advantages that quickly erode on the market. The challenge lies in increasing our capacity to innovate and, if possible, to do it on an ongoing basis and in different management areas strengthening each other. This rationale means that it any company or organisation intending to stay successful needs to push for a fully innovating culture.

When we think of widely recognised companies as being innovative we rather think of the likes of Apple, 3M, Danone, Federal Express, Nokia, Inditex, Virgin, Toyota, Nintendo and BMW. We also find some examples very nearby: AUSA, Metalquimia, La Farga Lacambra, Ficosa, Vertisub, etc. It is true that there are product categories and market segments where innovation is easier received by clients and consumers than others. It is also known that small and big companies have different levers to encourage innovation internally. However, there are innovating patterns in a vast majority of industries, both in consumer products and in industrial and service companies, no matter if they are public or private.

Innovating companies share a set of distinct characteristics that make them different from the more conventional ones. From an external point of view we could say that as users, consumers or analysts we associate innovating behaviour to some characteristic features (see chart 1). There are few chief executives, entrepreneurs or managers who do not wish such values for their company or organisation. The problem is how to start the process, direct the efforts and bring about the commitment to progress towards innovation when innovation has always been neglected by many of our companies and organisations.

Innovating means to do things differently from the past, so experience in more conventional professional careers is not very useful as a reference to innovate. Yet despite a growing awareness of the importance of innovation, many companies

Chart 1. Features of innovating companies

- > They surprise with creative contributions providing solutions to both traditional and new problems
- They are quick in grasping market opportunities
- > They swiftly change their management focus, especially as to market access
- They use multiple ways of creating added-value for clients
- > They look for an impact on the market on a regular basis
- They make the company attractive, both internally and externally
- Their people show enthusiasm for their work as well as self-confidence, which they believe will reflect on results

Innovating means to introduce new ideas to add value for clients, society and the company itself.

still do not make significant progress in this field or at least do not achieve as much as the increasing requirements of their environment demand. It is therefore necessary to switch efforts and reduce those devoted to overall awareness-raising programmes to the benefit of innovation.

It is now time to implement innovation, to help companies and organisations learn how to innovate by themselves and to do it in an efficient and profitable way so the process becomes consolidated and reaches a point of no return. Whenever an innovation process is well implemented it is clearly beneficial to the company. This is based on both empirical work¹ and practical experience from related companies.²

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When a company enters an innovation process it usually starts focusing on the key result area that is most critical according to the strategy it pursues, be it related to products, essential service aspects or any other business development issue. In all cases the services a company offers are the result of putting together multiple functions. As any area of the company can be revitalised by applying new ideas and innovation serves multiple goals beyond competitiveness, the need to create a setting to which everyone in the company can contribute turns out soon to be a necessity. Creating an innovating culture becomes an important point in the agenda of any senior executive and many board members.

Change towards an innovating culture

According to the most widespread notion of *culture*, this term stands for a set of values and beliefs, acquired by people during time, that become facts upon which our business can be built. Edgar Schein, one of the most renowned MIT academicians thanks to his contributions to this field, understands culture as a «pattern of basic assumptions – be they discovered, invented or developed by a given group as it had been learning to tackle problems of external adaptation and internal integration – working reasonably well to be considered valid and thus to be shown to new members as being the correct way of perceiving, thinking and feeling in relation to these problems.»³ How to change values and beliefs that have become basic assumptions to our people? It is quite difficult to change the people's mindset. Values and beliefs are part of people, they are within people and therefore difficult to change.

There is a good deal of senior managers who think that the best way of changing their company's culture is to replace people. In their opinion, changing mentalities requires sacking people opposed to change and replacing them by new ones who are more open towards the new situation that is to be implemented. Without denying that there are usually people in high-ranking positions reluctant to modifying the set order and if they become true obstacles to necessary change it is highly probable that it becomes indispensable to do a selective change of people, the big challenge for a good manager is to create the conditions to meet the targets counting on the people they have. It is therefore necessary to mobilise a majority within the company in favour of an exciting key project for the future of the organisation – all this by developing people, not replacing them.

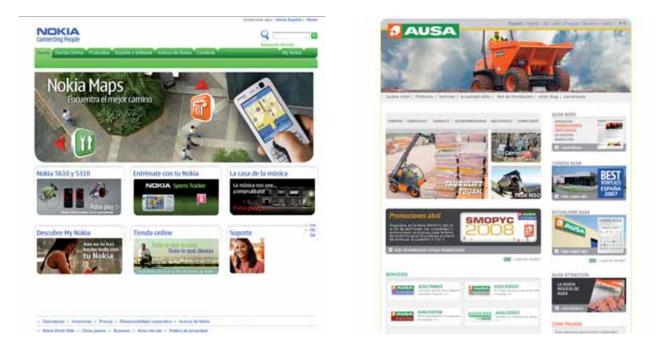
Although it is true that culture translates into a set of values and beliefs that tell us what is to be expected from people as well as what is legitimate and permitted to the company, these values and beliefs of people are the result of an accumulation in time of a given *way of functioning in management.*⁴ Managers, with their daily practice and their example, that is, with their formal and informal relations, are telling all the time what they appreciate and expect from their employees. The values and the mentality of our people in the company are the result of the accumulation of experiences they have been making at work.

Clayton Christensen, professor of innovation at Harvard, comes to a similar conclusion as he asserts: «Culture is made up of procedures, or ways of working together, and criteria shared to take decisions, used successfully time and over and adopted as basic assumptions.»⁵ To change the culture of our organisations and companies, replacing people is not the only and by no means the best way. Changing the culture requires to change the way of managing people, and this means essentially to change the way managers operate.

The safest way to raise an innovating culture is to implement management practices encouraging the intended innovating behaviour

This shows one of the biggest shortcomings many companies have but it also opens up new opportunities. Implementing specific management systems to foster innovation is a much more solid and safe way than pretending to change the people's mindset. Turning around business culture and making it more favourable to innovation does not require «a generation» anymore, nor can we afford to take all this time. It is urgent to help companies bring about quick change so they can adapt to new requirements. The safest way to raise an innovating culture is to implement management practices (involving progressively all levels with different tools) encouraging the intended innovating behaviour. By changing the way we manage (in any aspect: the way we set targets, plan, allocate resources, evaluate collaborators, reward, set the degree of accountability and autonomy, manage information, etc.) we are shaping the culture, be it consciously or unconsciously, which is the case much more often.

The same conclusion is drawn when thinking of highly innovating companies. There are two basic ways of achieving the distinctive capacity that characterises them. The first and most obvious is the culture established as a result of the personality of a founder (or a reduced founding team) with a high entrepreneurial spirit. The values and beliefs of companies such as Apple and Virgin are intimately linked to the character and action of their founders. It is impossible to think of Apple without Steve Jobs nor of Virgin without Richard Branson.



When we think of widely recognised companies as being innovative we rather think of the likes of Nokia or, in Catalonia, AUSA.

The second way is a culture that goes beyond the founding personality and lasts over time. It can be said that the values have become part of the company's DNA, they have become institutionalised. Does anybody know who the founders of companies like 3M and Danone were? Does anybody know who the top executives driving now these companies are? Neither is it known nor do the names as such matter.

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The key question is how to develop a capacity to innovate in a way that it lasts over time beyond the people who initially drove it. Research made by myself suggests that the answer to the challenge of having our companies last over time thanks to innovation is not hiring any big star but, much more importantly, implementing a set of specific managing practices to develop in a firm and constant way the capacity to innovate, that is, to **institutionalise a management of innovation.** The great challenge of getting a wide majority of employees within the company to carry out innovating initiatives in large business areas requires, rather than a great deal of leadership (which is also necessary being a process of change), especially abilities to manage and organise innovation. The latter two are much more scarce than the first.

If we wish to develop individual and organisational capacities so the company is able to renew and regenerate whenever circumstances recommend to do so, it is as crucial to bring about a mentality change among the senior management (to get rid of mindsets preventing from seeing anything different from what brought success in the past) as to set out a sustained process to implement values, principles and practices encouraging innovation increasingly. If they do not be-

Chart 2. Required results of a widespread ongoing innovation process⁷

- Generating a project and initiative portfolio as a reflection of the contribution by different areas of management to the key result areas in the company
- Implementing an own tailormade system according to the company's needs and aspirations and ensuring the continuity of the process over time
- Changing values, principles and competencies of people so there are ever more contributions, both individually and collectively
- Within the evolution towards an increasing capacity to innovate, a company will hardly make any progress without a firm and aware process leadership.

come institutionalised, the founders' values will disappear with time and after the entrepreneurial leader there will be only «burnt reed», as Esteve Masifern, a great master, mentor and executive, now professor emeritus at IESE, put it. What will happen to Apple when Steve Jobs is not around anymore? Let us just think of the results this very same company had when John Sculley replaced Jobs in the beginning of the 1990s.

What do we need to change to make culture more innovating?

The previous discussion leads us to the conclusion that a first crucial aspect is to understand that, in order to introduce effective progress for innovation into any organisation, the most important is to focus our efforts not on replacing people but on introducing management patterns that encourage and organise correctly an increasing contribution to innovation in the company. Managing innovation goes far beyond R&D management and becomes a way of leading people that binds targets, creativity and employees within tasks far away from everyday business. A company can only benefit from innovation if it is able to generate new ideas in line with its goals, translate these ideas into innovation projects and introduce these initiatives into the market effectively. Moreover, the best contribution of innovation to the successful pursuit of business goals is obtained through widespread ongoing innovation.⁶

Within this evolution towards an increasing capacity to innovate, a company will hardly make any progress without a firm and aware process leadership. This process needs to pursue and meet different targets, some closer to the more traditional way of perceiving innovation, others rather related to conceiving it as a transformation process (see chart 2).

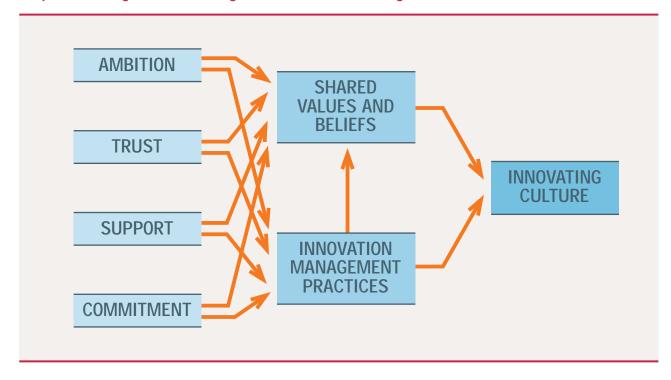
To raise an innovating culture, people need to be mobilised for a programme for change and the innovation process needs to be guided by some formal elements to ensure that targets are met.

Two of the different approaches towards innovation (one as a senior management system bringing an order into the different stages of the process, another as a system that creates altogether different factors driving the capacity to innovate) have been the object of previous works that have already been referred to. Here we will focus on a third one that deals with organisational aspects: the responsibilities of management to change the people's working methods so as to encourage organisational and individual capacity to innovate. Innovation requires working with heart and method. To make progress there, people need to give their best for the process. Key employees need to wish and be able to undertake the necessary changes. Senior management therefore needs to be aware that managing people bears both hard (formal organisation) and soft elements (informal organisation). Formal aspects bring about the fitting and balance between the different elements to an organisation (e.g. bringing introduced change in line with the goals) while informal aspects contribute to providing people with stimuli and freedom where formal organisation has left gaps (cf. BMW, Danone and Metalquimia in chart 1). A clear definition is as important as enough flexibility.

Raising an innovating culture means changing management practices in two ways. On the one hand, people need to be mobilised for a programme for change. This is not an easy task since it requires that people leave their comfort zones and enter areas they are not acquainted with. On the other hand, the innovation process needs to be guided by some formal elements to ensure that targets are met.

Management of change towards an innovating culture

The management lays the foundations of an innovating culture developing and implementing a set of values, principles and practices taken then over by employees, strengthening cohesion among the latter and determining how to make progress in the new process. The success of cultural change de-



Graph 1. Management of change towards an innovating culture

The success of cultural change depends on the ongoing and increasing contribution of key players favourable to innovation. pends on the ongoing and increasing contribution of key players favourable to innovation (members of innovation project teams, employees with ideas and initiative, heads of departments providing resources, communication facilitators between teams and departments, support units, etc.). Innovation as a programme for change is based on four basic pillars so these players keep attached to the process. These pillars have been proposed by Ghoshal & Bartlett⁸ for generic processes of change but they also apply to innovation.

• Firstly, it is up to the management to raise the level of ambition in the company and with its employees. There is no innovation without ambition. If a company is conformist with the results obtained it will feel no need for introducing changes. Managers and employees will tend to be more passive and push for what used to lead them to success. Active players will feel forceless to challenge, review and innovate management processes and patterns.

▶ Secondly, the management needs to have trust in the players participating most actively in innovation. Only if the team members and employees with initiative feel that they are trusted by management will they have the strength to go on trying to obtain success in adversity. The management can act on trust through different related values, principles and practices (cf. chart 1 for examples from Procter&Gamble and La Farga Lacambra).

▶ A third pillar in the process of change is a firm support by management. This support will be necessary to overcome reluctance by those against modifying the relations and processes innovation requires. It is also important that the allocation of resources to innovation is in accordance with its relevance (e.g. in development, exploration or training) compared to more urgent and less uncertain investment alternatives.

• The fourth, last and most important pillar has to do with unmistakable commitment by management towards innovation. If innovation is transformation, senior management needs to satisfy to its full extent the need for introducing change into current business practices to make innovation happen. As long as this commitment exists, innovation will be a priority on the senior management agenda and the needs of active innovation players will be better served. The management will then fulfil its role (e.g. giving immediate feedback to people giving ideas, playing a role in protecting innovation as project sponsor).

Senior management needs to be aware that the different players in the company are observant of how senior executives are consequent with these rules, adapting their commitment to innovation to that of senior management.

Procedures for innovation management

If raising an innovating culture should be the aim of any senior management team in any company or organisation, then this effort needs to go along different complementary innovation management patterns. Contrarily to the previous sections that have been focusing on what is to be achieved, the following will point out how to do it. To this end two management patterns are introduced that add to the set of values, principles and practices of managing action explained so far.

Companies without a longstanding innovation tradition require different management procedures to push for a fully innovating culture. They need a pattern to relate high-level goals with concrete management tasks in areas considered of big interest. A procedure to clearly define responsibilities and tasks over the innovation process is further needed.

Senior management pattern in innovation

Innovation is a tool to serve a company's goals. It can be done in many different ways so it is neces-

sary to define some clear guidelines for it, otherwise creativity leads to confusion. Strategic planning is not done at companies to guide innovation but for other reasons, so a previous effort is necessary to turn strategic needs into guidelines for innovation.

The directives or strategic lines serve as a point of departure to generate creative ideas. It is thus very usual to hold creativity sessions focused on a very relevant subject for the company, as is a strategic line as mentioned, an important problem or a concrete measurable goal. In all cases, employees invited to creativity workshops work on a creative focus linking company targets with actions at a more operative level.

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Creativity sessions usually generate a much higher number of ideas than actions able to be carried out. The next step is thus to select the ideas that will become innovation projects. The ideas chosen have to comply with various criteria that need to consider different aspects such as the priorities of the company, the impact on the market, their feasibility, urgency and required resources as well as some internal aspects in order to reach ongoing contributions.

The last stage focuses on managing innovation projects and initiatives. It includes formal aspects for defining and planning projects as well as organisational and managerial aspects for adequate development, going down to reaching the market and closing the project. In some cases, related to more complex company structures, there are mechanisms to widely disseminate the initiatives generated so as many units from the rest of the company as possible can take advantage of them. For instance, IBM Spain has incentives shared between those generating and those adopting an idea, and Ikea follows the principle of «take up your ideas from other Ikea stores with pride and use them in yours».

In order to be effective, such a general procedure needs to be adapted to the specifics of each company. This is a goal that has been pursued since 2000 under the initial drive of public institutions such as CIDEM and private ones like chambers of commerce, business associations and technology centres. In the last eight years, as many as a hundred Catalan and about fifty Valencia companies and organisations from different industrial, consumer good and service branches have adopted the procedure to develop and implement an own pattern for ongoing innovation. At the same time companies offering additional services have come up, providing for instance experts in finding creative radical solutions whenever they were not generated by an internal procedure or IT platforms giving support to innovation by linking the different stages of the process.

Implementing the elements of an organisation to innovate

Innovation is not about doing more (more hours, more resources, etc.) but about doing it differently. It is not about willingness to work but a change of perspective. It is not possible to innovate by expanding what we do in everyday business. Work needs to be organised in a different way.

Our companies and organisations have created structures that allow them to do similar tasks on a regular basis, minimising unexpected events in a productive way. Innovation moves along totally opposed rules: it tries to work with new ways of doing things, pursues surprising solutions opening up new ways towards creating value. In a word, innovation requires a specific organisation, different from that ruling daily business.

There are four key aspects to be considered. The first is the creation of an innovation committee as

Chart 3. Examples of innovation management values, principles and practices

Flexibility to decide on one's own work at BMW

«Great freedom and a stimulating environment for employees are important ingredients to innovation management. This translates for instance into the introduction of a high degree of flexibility in working times (in fact, there are over three hundred different working time schemes). Further, projects have been allowed that were initially unknown to the management.» Burkhard Goschel, executive committee member, BMW AG for Development and Purchasing.

A firm will by Procter&Gamble to adopt change based on innovation

«People have to be willing to come and see you with an idea. They need to know that you are going to listen to them and that their idea has a real chance. They need to believe that you are ready to change some of your own processes to give this idea a chance if it deserves it.» Gianni Ciserani, Brand Strategy, Learning to listen to new ideas, November 2005.

Fostering problem-solving networks at Danone

Danone has developed a whole set of tools to assist managers in exchanging best practices and solutions to problems in an informal way, such as sessions with simulations of leaving a bottle, a person asking for help to specific solution providers, shirts with needs printed on them or the creation of a mock market where donors and receptors meet with the aid of liaison people. The initiative has been so successful that the HR department is thinking of how to extend it outside the company towards other areas together with specific innovation tools. Source: Knowledge Management at Danone, case 9-608-107 at Harvard Bus. School, 2007 p. 8-11.

Developing specific tools at Metalquimia

«Six years ago, the company implemented a strategic innovation plan under the direct command of the chief executive. A specific area for innovation was created with own production workshop facilities to reduce conflict to a minimum. There is an innovation committee since 1998. It is key to tackle different stages simultaneously to optimise the process and make headway towards a culture involving everybody in the company.» Josep Lagares, director general of Metalquimia (Girona, Catalonia).

Management style stimulating people's open-mindedness

«When someone comes with a problem they are asked to give not one but two possible solutions. If there is only one there is usually a mental blockade towards the proposed solution. This is not the case when two solutions are given.» Pilar Almagro, director general, Vertisub (Ripollet, Catalonia).

The role of the management facilitator at La Farga Lacambra

«Management needs to explain thoroughly its decisions on innovation. All proposals are answered. If an idea is not accepted we tell the reason. People are most motivated by having their ideas acknowledged and implemented. Management has to prevent a blockade of the process due to a big amount of obstacles ideas encounter before being introduced into the market.» Oriol Guixà, CEO, La Farga Lacambra (Les Masies de Voltregà, Catalonia).

the main governing body to manage the whole process in the company. It is a body that should be well represented by senior management but it shall not be a replica of the board of directors in order to avoid daily business issues to interfere with innovation matters.

The innovation committee is to overlook the correct deployment of each stage of the process and plays a paramount role in different aspects such as approving the innovation project and initiative portfolio, the allocation of resources to projects, the link between strategy and capture of ideas, process follow-up and evaluation and especially progress towards an innovating culture. As the main sponsor of innovation it looks after the modification of basic processes and management systems (e.g. incentives) for innovation to make progress. Without this committee, innovation would progressively fall prey to multiple potential foes such as pressure by daily business, the urgency to produce results, reluctance to change and complacency.

Innovation is about a change of perspective. Work needs to be organised in a different way.

The second aspect is the operative unit to implement the innovation project or initiative. The most commonly used formula has traditionally been to nominate a senior executive to take charge of it. By now the evolution has moved towards different patterns according to the attributions and the authority of the head of project. The project coordinator is quite a widespread figure who has to seek support from different departments needed to carry out the project. The more complex the project, the more necessary high ranks will become to coordinate activities horizontally and to integrate objectives. This leads us to the convenience of implementing innovation project teams. The teams need somebody who is clearly in charge and whose authority has positive effects on the organisation's operation and good progress of the projects.⁹ It is important that teams report to a general instance such as the innovation committee and not to an executive director since this could create an imbalance in priorities when leading the project. Good project management implementation has strong cultural implications that go beyond the tangible results the projects may produce.

Providing innovation with continuity requires some rules of procedure. This is a document containing the rules and basic tasks of all new functions for spearheading innovation (innovation committee, project teams, heads of project, units facilitating resources, idea manager, etc.). A useful tool to clarify responsibilities of different players in the process of change brought about by innovation is the table of responsibilities¹⁰ that contains the agreements reached as to what kind of authority different players have in relation to different decisions to be taken. This tool is also known as RASCI or RACI (Responsible, Accountable, Supportive, Consulted, Informed) model.

One last important organisational aspect is to carefully select the criteria that are to guide the implementation of organisational changes. A key aspect is the alignment of supporting elements with the organisation to be innovated. Four aspects need to be put together to lead progress to a given new working method in an orderly manner: accountability structure, management systems, management style and employees and the layout of their job. This means looking at how to modify the systems to allocate resources, information, incentives and developing capacities to assist in the change of mentality required by innovation. After all, what is stated is that moving to an innovating culture requires implementing at the same time a pattern as well as some organisational principles and practices to innovate. These are three aspects of one same reality: management responsibilities to make our companies and organisations more innovating. There are not many alternatives if we want to progress successfully and keep our current living standard.

Conclusions

Heading towards an innovating culture is, despite its big challenges, an unavoidable task to most senior management teams. Good innovation management requires:

• Incorporating progressively specific values, principles and practices to foster innovation, which are very different from current culture in many companies.

• Innovating methodically, which means implementing an orderly procedure to bind matters that are highly relevant to the company, by capturing creative ideas that are to meet these challenges and by launching innovation projects or initiatives.

Developing organisational practices that foster principles different from those guiding daily business but also have to be taken on wholeheartedly by people so they can make innovation and everyday business compatible.

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Notes

- 1. JONASH R. S.; SOMMERLATTE T. (LITTLE, A. D.). The Innovation Premium. Perseus Books, 1999.
- 2. Such is the case of companies having won the IT Award for Innovation, 2001-2005, CIDEM, Generalitat de Catalunya.
- 3. SCHEIN, E. Organizational Culture and Leadership, San Francisco. Jossey-Bass Publishers, 1988.
- 4. MASIFERN, E. «Dirección Estratégica», note of the IESE Research Division, SN-54, January 1984.
- 5. CHRISTENSEN, C. M. «What is an Organization's Culture?». Harvard Business School, 9-399-104.
- 6. Vilà, J.; MacGregor, S. «Business Innovation: What it brings, What it takes», IESE Alumni Magazine, July 2007, p.8-12.

10. JOYCE, W. J. Megachange: How Major Companies Transform Their Workforce. Free Press, 1999, p. 146-151.



^{7.} These items are included in different works written by the author together with José Antonio Muñoz-Nájar, such as: «El Sistema de Innovación: Competencias organizativas y directivas para innovar». *Revista de Antiguos Alumnos del Iese*, March 2002, p. 13-24. Further in «Gestión por Iniciativas Estratégicas: Innovar por Sistema», *Revista de Antiguos Alumnos del Iese*, July 2004, p.20-24. Nevertheless, the subject is dealt with in-depth in a joint book that is under work now.

^{8.} GHOSHAL, S.; BARTLETT, C. A. Linking Organizational Context and Managerial Action: The Dimensions of Quality of Management. *Strategic Management Journal*, Summer 1994, vol. 15, no. 5, p. 91-112.

^{9.} CLARK, K. B.; WHEELWRIGHT, S. C. «Organizing and Leading 'Heavyweight' Development teams». *California Management Review*, Spring 1992, p. 9-28.