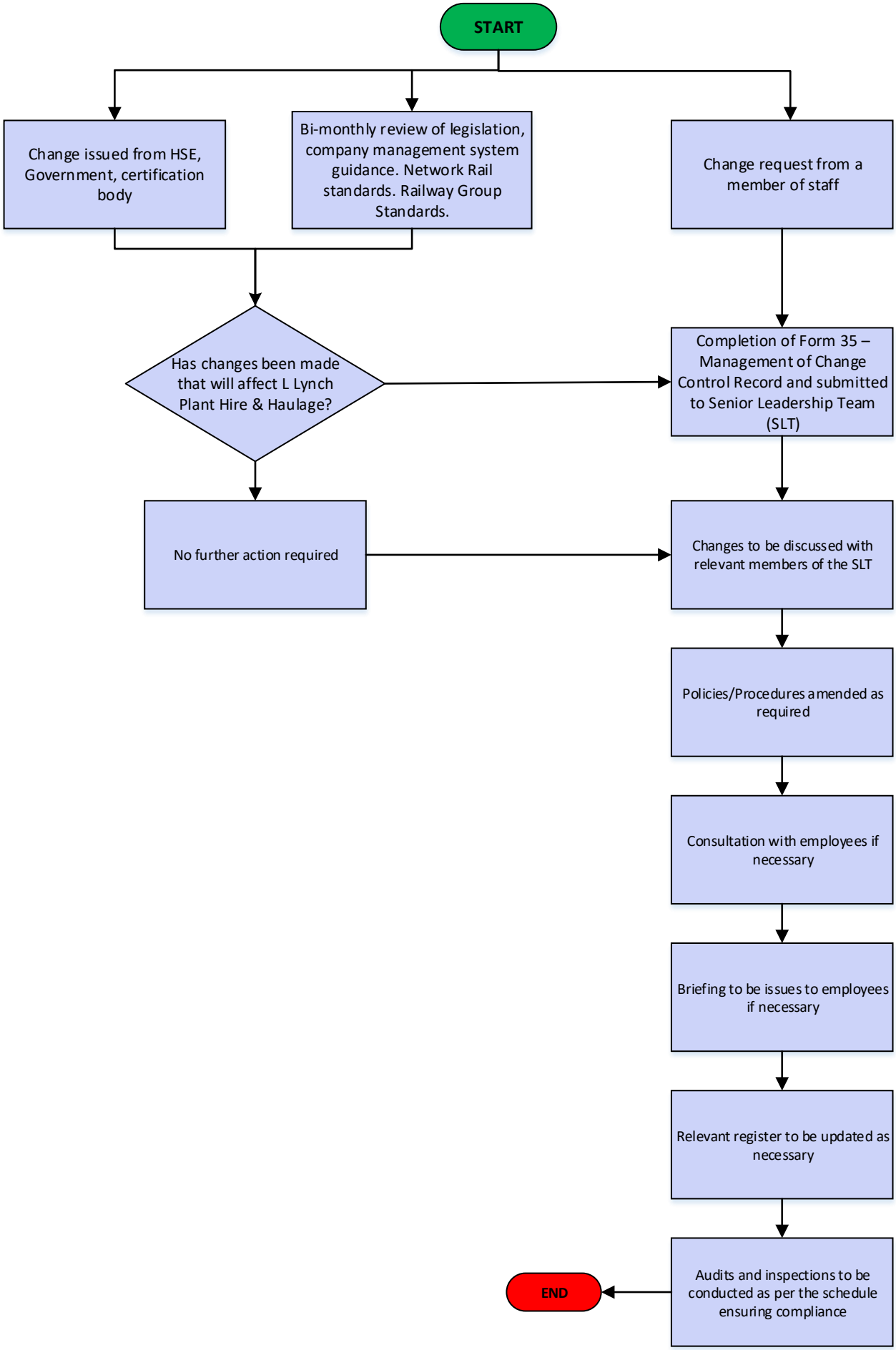WP39 Change Management - External