

### : : बाबुक्त (बर्पीस्य) का कार्यालयं, वस्तु एवं सेवा करवीरकेन्द्रीय उत्पाद शुल्कः: O/O THE COMMISSIONER (APPEALS), GST. & CENTRAL EXCISE

द्वितीय तल, जी एस टी भवन / 2<sup>nd</sup> Floor, GST Bhavan रेस कोर्स रिंग रोड / Race Course Ring Road

## राजकोट / Raikot - 360 001

Tele Fax No. 0281 - 2477952/2441142Email: commrapp13-cexamd@nic.in





अपील / फाइलसंख्या/ <sup>क</sup> Appeal /File No. V2/82/BVR/2022 मूल बादेश मं / O.I.O. No. BHV-EXCUS-000-ADC-VM-020-2021-22 विनोक/Date 3/3/2022

अपील आदेश संख्या(Order-In-Appeal No.):

### BHV-EXCUS-000-APP-130-2022

आदेश का दिनांक / Date of Order: 26.12.2022

जारी करने की तारीख / Date of issue:28,12,2022

श्री तिव प्रताप सिंह, आवुक्त (अपील्म), राजकोट द्वारा पारिम /

Passed by Shri Shiv Pratap Singh, Commissioner (Appeals), Rajkot.

म अपर अपुक्त/ संयुक्त अपुक्त/ उपायुक्त/ सहायक आयुक्त, केन्द्रीय उत्पाद शुरूक/ सेवाकर/त्रस्तु एवंसेवाकर, राजकोट / जायनगर / गांधीधाम। द्वारा उपरसिख्ति जारी मुख आदेश से सुजित: /

Arising out of above mentioned OTO issued by Additional/Joint/Deputy/Assistant Commissioner, Central Excise/ST / GST, Rajkot / Jamnagar / Gandhidham :

व्यंगीलकर्ताकेप्रतिवादी का नाम एवं पता /Name & Address of theAppellant&Respondent :-

M/s. Dipakbhai Nathuram Aswani, 1, Shiv Chambers, Opp. People's Bank, Wadhwan,Dist.: Suxendranagar, Gujrat- 363031

इस आवेश(अपीन) से व्यक्ति कोई व्यक्ति निम्निवित तरीके में उपयुक्त प्राधिकारी / प्राधिकरण के समझ अपीन वायर कर सकता है।/ Any person aggrieved by this Order-in-Appeal may file an appeal to the appropriate authority in the following way.

ं सीमा शुल्क , केन्द्रीय उत्पाद शुल्क एवं मेबाकर अपीसीय न्यायाधिकरण के पति अपीस, केन्द्रीय उत्पाद शुल्क अधिनियम , 1944 की धारा 35B के अंतर्गत (A) एवं विसे अधिनियम, 1994 की धारा 96 के अंतर्गत निम्नानिकित जगह की आं सकती है।/

Appeal to Customs, Excise & Service Tax Appellate Tribunal under Section 35B of CEA, 1944 / Under Section 86 of the Finance Act, 1994 an appeal lies to:-

(i) वर्गीकरण मृत्यांकम से सम्बन्धित सभी मामले नीमां शुंक्क, केन्द्रीय उत्पादन शुक्क एवं सेवाकर अपीतीय न्यायान्निकरण की विशेष पीठ, वेस्ट व्यॉक नं 2, आर॰ के पुरेम, नई विश्वी, को की जानी चाहिए।/

The special bench of Customs, Excise & Service Tax Appellate Tribunal of West Block No. 2, R.K. Puram, New Delhi in all matters relating to classification and valuation.

(ii) उपरोक्त परिच्छेद 1(a) में बताएं नए अपीवों के असावा शेव सभी अपीवों सीमा शुल्क, केंद्रीय उत्पाद शुल्क एवं मेवाकर अपीतीय त्यायाधिकरण (सिन्टेट) की पश्चिम क्षेत्रीय पीठिका, ,द्वितीय तस, बहुमानी मनन असावा अहमवाबाद- ३८००१६को की जानी काहिए।/

To the West regional bench of Customs, Excise & Service Tax Appellate Tribunal (CESTAT) at, 2<sup>nd</sup> Floor, Bhaumail Bhawan, Asarwa Ahmedabad-380016in case of appeals other than as mentioned in para- 1(a) above

(iii) विद्यानाधिकरण के सुमझ अपील प्रस्तुत करने के लिए केन्द्रीय उत्पाद शुक्क (अपील) नियमावंती, 2001, के नियम 6 के अंतर्गत निर्धारित किए गये प्रवृत EA-3 को चार प्रतिवा में दर्ज किया जाना चाहिए। इसमें से कम ते कम एक प्रति के साथ, जहां उत्पाद शुक्क की माण, ज्याज की माण और लगाया गया जुर्माना, क्याप के साथ या उत्पाद की कर्माए का तर्ज कर्माण एक अंचेचा 50 लाख वा प्रति के साथ में उत्पाद की माण और लगाया गया जुर्माना, क्याप 3 नाथ के प्रति के साथ करी शासा के हादायक रजिस्टार के नाम से किसी भी सार्विजनक क्षेत्र के के इस द्वारा जारी रेखांकित विद्या जाना का सिर्ध की साथ प्रति के साथ की साथ क

The appeal to the Appellate Tribunal shall be filed in quadruplicate in form EA-3 / as prescribed under Rule 6 of Central Excise (Appeal) Rules, 2001 and shall be accompanied against one which at least should be accompanied by a fee of Rs. 1,000/- Rs.5000/-, Rs.10,000/- where amount of dutydemand/interest/penalty/refund is upto 5 Lac, 5 Lac to 50 Lac and above 50 Lac respectively in the form of crossed bank draft in favour of Asst, Registrar of branch of any nominated public sector bank of the place where the bench of any nominated public sector bank of the place where the bench of the Tribunal is situated. Application made for grant of stay shall be accompanied by a fee of Rs. 500/-

अपीलीय स्थायांश्रिकरण के समक्ष अपील, जिल्ल अधिनियम, 1994 की धारा 96(1) के अंतर्गत सेवाकर नियमवानी, 1994, के नियम 9(1) के तहत निर्धारित प्रथम 8.T, -5 में बार प्रतियों में की जा सकेगी एवं उसके प्राथ जिल आदेश के विरुद्ध अपील की गयी हो, उसकी प्रति साथ में संसप्त करें (उनमें में एक प्रति प्रमाणित होनी बाहिए) और वनमें से कम से कम एक प्रति के साथ, जहां सेवाकर की मौग , ज्याज की मौग और संगाया गया जुमाना, उपए 5 नाल या उत्तर के साथ का प्रति मान के प्रति संस्था कर वाला 50 नाल क्या का अधिक है तो कम्या: 1,090/- कपमे, 5,000/- कपमें अधित 10,000/- कपमें का पात का प्रति संस्था के प्रति संस्था करें। निर्धारित प्रति संस्था करें। निर्धारित प्रति संस्था करें। निर्धारित श्रीक की साथ की साथ के महायक रिजस्टार के साथ की साथ की साथ की साथ की साथ की साथ की साथ में किसी भी मार्याजनक सेवा के बेक द्वारा जारी रेखांकित बेक द्वारा किसी की मार्याजनक सेवा के साथ की उन शाखा में होना काहिए जहां संबंधित अपीलीय न्यायाधिकरण की शाखा स्थित है। स्थान आदेश (स्टे ऑडरें) के सिए आवेदन-पत्र के साथ 500/- कपए का निर्धारित शुन्क जमा करना होगा।/

The appeal under sub section (1) of Section 86 of the Finance Act, 1994, to the Appellate Tribunal Shall be filed in quadruplicate in Form S.T.5 as prescribed under Rule 9(1) of the Service Tax Rules, 1994, and Shall be accompanied by a copy of the order appealed against (one of which shall be certified copy) and should be accompanied by a fees of Rs. 1000/- where the amount of service tax & interest demanded & penalty levied of Rs. 5 Lakhs or less, Rs.5000/- where the amount of service tax & interest demanded & penalty levied is more than five lakhs but not exceeding Rs. Fity Lakhs, Rs.10,000/- where the amount of service tax & interest demanded & penalty levied is more than five lakhs hut not exceeding Rs. Fity Lakhs, Rs.10,000/- where the amount of service tax & interest demanded & penalty levied is more than five Lakhs rupees, in the form of crossed bank draft in favour of the Assistant Registrar of the bench of nominated Public Sector Bank of the place where the bench of Tribunal is situated. / Application made for grant of stay shall be accompanied by a fee of Rs.500/-.

B)

अपीत्स

(i)

(ii)

भारत सरकार कीपुनरीक्षण आवेषण :
Revision application to Government of India:
इस आवेश की पुनरीक्षण आवेषण निमानिकेत बाममा में, केदीय उत्पाद शुक्त बामिन्यम, 1994 की धारा 35EE के प्रथमपूरंतक के अंतर्गतववर सचिव,
भारत सरकार, पुनरीक्षण आवेषन इंकाई, विश्व मंत्रावय, राजस्य विभाग, चौथी मंजिल, जीवन चीप भवन, संसद मार्ग, नई दिण्ली-110001, को किया
जाना चाहिए।
A revision application lies to the Under Secretary, to the Government of India, Revision Application Unit,
Ministry of Finance, Department of Revenue, 4th Phoor, Jeevan Deep Building, Parliament Street, New Delhi110001, under Section 35EE of the CEA 1944 in respect of the following case, governed by first proviso to subsection (1) of Section-35B ibid: (C)

यवि मान के किसी नुक्सान के भामने में, जहां नुक्सान किसी मान को किसी कारवाने से मंदार गृह के पारणमन के दौरान या किसी अन्य कारवाने या किर किसी एक मंदार गृह से दूवरे भंदार गृह पारणमन के दौरान, या किसी भंदार गृह में या मंदारक में भान के प्रसंस्करण के दौरान, किसी कारवाने या किसी भंदार गृह में मान के मुक्सान के मानक में/ In case of any loss of goods, where the loss occurs in transit from a factory to a warehouse or to another factory or from one warehouse to another during the course of processing of the goods in a warehouse or in storage whether in a factory or in a warehouse (i)

भारत के बाहर किसी राष्ट्र या क्षेत्र को निर्मात कर रहे माल के बिनिर्माण में प्रयुक्त कही मास पर भरी गई केन्द्रीय उत्पाद शुक्त के हुट (रिवेट) के मामले में, जो भारत के बाहर किसी राष्ट्र या क्षेत्र को निर्मात की गयी है। / In case of rebate of duty of excise on goods exported to any country or territory outside India of on excisable material used in the manufacture of the goods which are exported to any country or territory outside India. (ii)

वदि उत्पाद शुल्क का भुगतान किए बिमा भारत के बाहर, नेपास या भुटान की मास निर्यात किया नया है। / In case of goods exported outside india export to Nepal or Bhutan, without payment of duty. (111)

सुनिश्चित उत्पाद के उत्पादन शुन्क के भुगतान के लिए जो काटी केडीट इस अधिनियम एवं इसके विभिन्न भावधानों के तहत मान्य की गई है और ऐसे आदेश जो अगुरू (अपील) के द्वारा विच अधिनियम (म॰ 2),1998 की धारा 109 के द्वारा नियत की गई तारीख अथवा समायाविधि पर या बाद में पारित किए गए हैं। किए गए हैं। Credit of any duty allowed to be utilized towards payment of excise duty on final products under the provisions of this Act or the Rules made there under such order is passed by the Commissioner (Appeals) on or after, the date appointed under Sec. 109 of the Finance (No.2) Act, 1998. (iv)

उपरोक्त अनेवन की वो प्रतिवां प्रपन्न संस्था EA-8 में, जो की केन्द्रीय उत्पादन शुक्क (अपीक) नियमावर्षी, 2001, के नियम 9 के बंतर्गत बिनिर्दिष्ट है, इस आवेश के संप्रेषण के 3 माह के अंवर्गत की जानी चाहिए। उपरोक्त अवेवन के सांच मूर्च अवेश व अपीस अवेशा की वो प्रतियां संनग्न की जानी चाहिए। साथ ही केन्द्रीय उत्पाद शुक्क बोबेनियम, 1944 की बारा 35-EE के तहत निर्धारित शुक्क की अवायगी के सक्त्य के वौर पर TR-6 की प्रति संनग्न की जानी चाहिए। 7 The above application shall be made in duplicate in Form No. EA-8 as specified under Rule, 9 of Central Excise (Appeals) Rules, 2001 within 3 months from the date on which the order sought to be appealed against is communicated and shall be accompanied by two copies each of the OlQ and Order-in-Appeal. It should also be accompanied by a copy of TR-6 Challan evidencing payment of prescribed fee as prescribed under Section 35-EE of CEA, 1944, under Major Head of Account. (v)

पुनरीक्षण आवेदन के साथ निम्निविद्यत निर्धारित शुरूक की बदायगी की जानी चाहिए। जहाँ संबंध रकम एक सांख रूपये या उदसे कम हो तो रूपये 200/- का भुगतान किया जाए और यदि संबंध रकम एक लाख रूपये से ज्यादा हो तो रूपये 1000 -/ का भुगतान किया जाए। The revision application shall be accompanied by a fee of Rs. 200/- where the amount involved in Rupees One Lac or less and Rs. 1000/- where the amount involved is more than Rupees One Lac. (vi)

(D)

1975, के अनुसूची-। के अनुसार सूक्ष आदेश एवं स्वयन आदेश की प्रति पर निर्धारित 6.50 रुपये का यथासंगोधित न्यायानय शुल्क अधिनियम, 1975, के अनुसूची-। के अनुसार मूझ आदेश एवं स्वगन आदेश की प्रति पर निर्धारित 6.50 क्यये का न्यायानय सुरू टिक्टि नगी होना चाहिए। / One copy of application or O.I.O. as the case may be, and the order of the adjudicating authority shall bear a court fee stamp of Rs.6.50 as prescribed under Schedule-I in terms of the Court Fee Act, 1975, as amended. Œ)

तीमा शुरूक, केन्द्रीय उत्पाद शुरूक एवं तेवाकर अधीतीय त्यायाधिकरण (कार्य विधि) वियमावती, 1982 में वर्णित एवं बत्य संबन्धित मामलों को सम्मिनित करने वासे नियमों की और भी ध्यान सार्थानित किया जाता है। / Attention is also invited to the rules covering these and other related matters contained in the Customs, Excise and Service Appellate Tribunal (Procedure) Rules, 1982. (F)

उच्च अपीलीय प्राधिकारी को अपील पालिल करने से संबंधित व्यापक, विस्तृत और नवीनतम प्रावधानों के लिए, अपीलाणी विभागीय नेवसास्ट www.cbec.gov.in को देख तकते हैं ।/ For the elaborate, detailed and latest provisions relating to filing of appeal to the higher appellate authority, the appellant may refer to the Departmental website www.cbec.gov.in. (G)



# : अपील आदेश / ORDER-IN-APPEAL ::

M/s. Dipakbhai Nathuram Aswani Wadhwan Dist. Surendranagar (hereinafter referred to as "Appellant") has filed the present Appeal against Order-in-Original No. BHV-EXCUS-000-ADC-VM-020-2021-22 dated 03.03.2022 (hereinafter referred to as 'impugned order') passed by the Additional Commissioner, Central GST, HQ. Bhavnagar (hereinafter referred to as

- The facts of the case, in brief, are that the Income Tax Department 'adjudicating authority'). shared the third party information/ data based on Income Tax Returns/ 26AS for the Financial year 2015-16 of the Appellant. Letter dated 30.03.2019 was issued 2. by the Jurisdictional Range Superintendent requesting the Appellant to provide information/ documents for the Financial year 2015-16. A summon dated 23.09.2020 was also issued to the Appellant to provide the details. However, no reply was received from the Appellant.
  - In absence of data/information, a show cause notice dated 29.12.2020 was issued to the Appellant, demanding Service Tax and cess to the tune of Rs. 1,37,52,166/- under Section 73(1) of the Finance Act, 1994 (hereinafter referred to as 'the Act') alongwith interest under Section 75 of the Act. It was also proposed to impose penalties under Section 78, 77(2) and 77(1)(c) of the Act upon the Appellant.
  - The adjudicating authority vide the impugned order confirmed Service Tax demand of Rs. 10,27,194/- under Section 73(1) along with interest under Section 75 of the Act and dropped the demand of Rs. 1,27,24,972/. The Adjudicating Authority imposed penalty of Rs. 10,27,194/- under Section 78 and penalty of Rs. 10,000/- each under Section 77(2) and 77(1)(c) of the Act.
  - Being aggrieved, the Appellant has preferred the present appeal on various grounds as stated below:
  - The Adjudicating Authority erred in confirming the demand based on the wrong understanding that the Appellant had claimed exemption under Entry No. 12(a) of the Notification No. 25/2012-Service Tax despite the fact that they had never claimed that but they were claiming exemption under entry no. 13(a). The Adjudicating Authority has not recorded any reason why they are not entitled for exemption under Entry No. 13(a) of the said Notification.
  - The Adjudicating Authority erred in confirming the demand for services provided of construction/ repair/ maintenance of roads merely because of the fact that such activities are also undertaken for the attached structure like entry gate, guard cabin and protection wall despite the fact that in terms of Section 66F(3) such services are naturally bundled and shall be treated as services elated to roads only which is giving essential character of the contract.

The Show Cause Notice was issued without any investigation and merel (iii) based on third party data despite it is well settled principle that such Show Cause Notice cannot be issued in violation of judicial discipline as per decision in the case of M/s. Amrish Rameshchandra Shah (Bombay High Court), Sharma Fabricators & Erectors Pvt. Ltd. - 2017 (5) GSTL 96 (Tri.-All.) etc. were bought to the notice of the Adjudicating Authority. (iv)

The Adjudicating Authority erred in invoking extended period of limitation despite the fact that there is not an iota of evidence which suggests suppression On their part since they were under bona fide belief that their services were exempted. The Adjudicating Authority also erred in imposing penalty under Section 78(1) of the act and other penalties despite the fact that neither there is suppression on their part nor any tax is payable.

6. The matter was posted for hearing on 13.12.2022. CA Punit Prajapati appeared for pational hearing in a virtual mode and reiterated the submissions made in the appeal. He submitted that the Appellant was providing road construction service to Government Department which are exempt and the Adjudicating Authority had dropped demands in all 90 cases, except this one. He submitted that in the present case forest department has awarded contract for. construction of road alongwith boundary wall. However, Adjudicating Authority has denied exemption considering it as construction of wall only. Actually wall is integral part of the road. Even if it is treated as composite contract, the same has to be classified as road construction service according to the main activity. Even if the same is not accepted, Adjudicating Authority should have charged tax on proportionate basis after allowing the applicable rebate. Therefore, he requested to set aside the Order-In-Original and allow the appeal.

I have carefully gone through the case records, impugned order and 7. appeal memorandum filed by the Appellant. I find that the issue to be decided in the case on hand is whether the activity carried out by the appellant is liable to Service Tax or otherwise.

I find that Show Cause Notice had been issued without verifying any data or nature of services provided by the Appellant as the same had been issued only . 8. on the basis of data received from the Income Tax department.

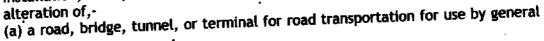
I find that out of total demand of Rs. 1,37,52,166/-, the Adjudicating Authority vide the impugned order, dropped the demand of Rs. 1,27,24,972/and confirmed the demand of 10,27,194/-. The confirmed demand is in three parts. First is the income of Rs. 26,940/- received from Shri Ajaykumar Hiralal Thakur as shown in Form 26AS on which TDS under Section 194H was deducted and the Appellant had not submitted any reply/ documents for claiming exemption from Service Tax and hence the Adjudicating Authority confirmed the demand of Rs. 3,906/-. I find that the Appellant has not contested this demand



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in their grounds of appeal nor submitted any documents for claiming exemption thereon. Therefore, I am of considered view that the Appellant is liable to

- The second part of the confirmed demand is on income of Rs. 40,792/-9.2 earned from Project Implementation Unit. I find that the Appellant has not submitted any documents before Adjudicating Authority for claiming exemption from Service Tax. On going through the appeal memorandum, the Appellant has not submitted any grounds/ supporting documents for claiming exemption on this also. Therefore, I find that the Appellant is liable to Service Tax of Rs. 5,915/- as demanded in the impugned order.
- 9.3 The third part of the confirmed demand is on income of Rs. 70,16,364/earned by the Appellant from Deputy Conservator of Forests and the Appellant has not submitted any work order/ contract/ agreement issued by the RFO, Surendranagar before the Adjudicating Authority. However, the Appellant submitted 9 invoices in this regard before the Adjudicating Authority as per which the work carried out by the Appellant is construction of approach C.C. Road, security Guard cabin, entry gate and Protection Wall at Surendranagar, Thangadh, Chotila, Dhrangadhra and Kharaghoda Range Forest Office. The Adjudicating Authority found that such construction of Guard Room Protection Wall falls under "construction related to a civil structure or any other original works meant predominantly for use other than for commerce, industry, or any other business or profession" and the said service provided to the Government, a local authority or a governmental authority was exempted upto 31.03.2014 under Clause 12(a) of the Notification No. 25/2012-Service Tax dated 30.06.2012 and the said exemption was withdrawn by virtue of Notification No. 6/2015-Service Tax dated 01.03.2015 w.e.f. 01.04.2015 by omitting the entry No. 12(a) of the Notification No. 25/2012-Service Tax.
  - I find that the Appellant produced copy of tender acceptance letter dated 04.12.2015 issued by the Deputy Conservator of Forest, Surendranagar wherein the subject is mentioned as "construction of approach C.C. road, security guard cabin, entry gate and protection wall work". It is the findings of the Adjudicating Authority that this work falls under Entry No. 12 (a) of the Notification No. 25/2012-Service Tax whereas, the contention of the Appellant is that this work falls under Entry No. 13(a) of the said Notification. The sub-clause (a) of Entry No. 12 was omitted vide Notification No. 6/2015-Service Tax dated 01.03.2015 w.e.f. 01.04.2015. To verify the claim of the Appellant the entry No. 13 is re-produced below:
    - 13. Services provided by way of construction, erection, commissioning, installation, completion, fitting out, repair, maintenance, renovation, or





public:

- I also find that the work assigned to the Appellant is a composite work 9.5 order for construction of approach C.C. road, security guard cabin, entry gate and protection wall for various Range Forest offices falling under Surendranagar Range Forest. This works carried out by the Appellant is meant predominantly for use other than for commerce, industry, or any other business or profession which is to be used by the Government authority and/or general public only. Therefore, there is force in argument advanced by the Appellant and accordingly, the Appellant is not liable to pay Service Tax on the income earned from RFO, Surendranagar.
- In view of the above discussions and findings, I set aside the impugned 10. order confirming the demand of Service Tax of Rs. 10,17,373/- and I uphold the impugned order confirming the demand of Rs. 3,906/- and Rs. 5,915/- as discussed in para supra, alongwith interest and penalties under Section 78, 77(2) and 77(1)(c) of the Act. However, due to re-calculation of Service Tax amount, I extend benefit of reduced penalty as envisaged under proviso to Section 78 of the Act subject to fulfilment of the conditions of the said proviso.
- In view of discussions and finding, I partially set aside the impugned order and partially allow the appeal filed by the Appellant.
- अपीलकर्ता द्वारा दर्ज की गई अपील का निपटारा उपरोक्त तरीके से किया जाता है। 12.
- The appeal filed by Appellant is disposed off as above. 12.

सत्यापित / Attested

(शिव प्रताप सिंह)/(Shiv Pratap Singh),

Superintendent · Central GST (Appeals)

आयुक्त (अपीज़)/Commissioner (Appeals)

By R.P.A.D.

Rajkot

To, M/s. Dipakbhai Nathuram Aswani, 1, Shiv Chambers, Opp.: People's Bank, Wadhwan, Dist.: Surendranagar-363031.

सेवा में. मे॰ दीपकभाई नथुराम असवाणी, 1, शिव चेंबर्स, पीपल्स बैंक के सामने, वढवाण, जिला: सुरेन्द्रनगर-363031 ।

#### प्रतिलिपि:-

- 1) मुख्य आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, गुजरात क्षेत्र, अहमदाबाद को जानकारी हेतु।
- 2) आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, भावनगर आयुक्तालय, भावनगर को आवश्यक कार्यवाही हेत्।
- 3) अपर/संयुक्त आयुक्त, वस्त् एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, भावनगर को आवश्यक कार्यवाही हेत्।
- सहायक आयुक्त, वस्तु एवं सेवा कर एवं केन्द्रीय उत्पाद शुल्क, सुरेन्द्रंनगर मण्डल को अवश्यक कार्यवाही हेतु।
- गार्ड फ़ाइस।

