



State of Georgia

Department of Revenue

Suite 15300

1800 Century Boulevard

Atlanta, Georgia 30345

(404) 417-2100

February 15, 2006

Bart L. Graham  
Commissioner

[REDACTED]

Re: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding the Thirty-Third Supplemental Indenture, between [REDACTED] ( [REDACTED] ), Grantor, and [REDACTED], Trustee, Grantee, relating to the [REDACTED] and the [REDACTED]

Dear [REDACTED]:

In reply to your request pursuant to O.C.G.A. § 48-6-71 with respect to the application of the Georgia intangible recording tax imposed by O.C.G.A. § 48-6-61, it is my determination, based on the information presented in your letter dated January 19, 2006, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Thirty-Third Supplemental Indenture, between [REDACTED] ( [REDACTED] ), Grantor, and [REDACTED] Trustee, Grantee, relating to the [REDACTED] and the [REDACTED] because such Notes are issued to the [REDACTED], an instrumentality of the government of the United States of America, and the [REDACTED], an agency of the government of the United States of America, and thus are exempt from the Georgia intangible recording tax imposed by O.C.G.A. § 48-6-61.

Sincerely,

Bart L. Graham

BLG/RJL/mb