



Department of Revenue  
State of Georgia

410 Trinity-Washington Building  
Atlanta, Georgia 30334  
(404) 656-4015

T. Jerry Jackson  
Acting Commissioner

January 17, 1997

[REDACTED]

RE: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71 regarding a First Amendment to Consolidated Mortgage and Security Agreement ("First Amendment"), dated as of December 1, 1996, by and between [REDACTED] as mortgagor, the [REDACTED], an instrumentality and wholly-owned corporation of the United States of America, the United States of America, acting through the Administrator of the [REDACTED], formerly known as the [REDACTED] ("[REDACTED]"), formerly known as the [REDACTED] as successor by merger to the [REDACTED], [REDACTED], and [REDACTED] formerly known as [REDACTED], as trustee under [REDACTED] and [REDACTED] as mortgagees, creating a security interest in real property located throughout the State of Georgia.

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

[REDACTED]  
January 17, 1997

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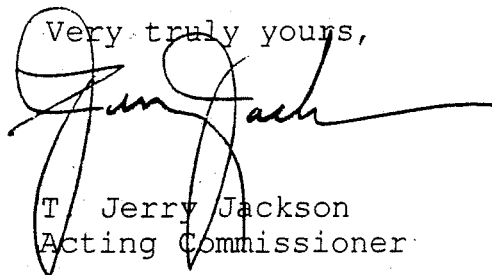
recording tax imposed by O.C.G.A. § 48-6-61, it is my determination, based on the information presented in your letter dated November 16, 1996, along with the accompanying documents, that:

(1) The Georgia intangible recording tax will not be due upon the filing for record of the First Amendment with respect to the 1996 [REDACTED] issued by [REDACTED] to the [REDACTED] in a principal amount of up to [REDACTED] because the obligee thereunder is a public authority and the [REDACTED] therefore is public property and exempt from the Georgia intangible recording tax imposed by O.C.G.A. § 48-6-61.

(2) The Georgia intangible recording tax will not be due upon the filing for record of the First Amendment with respect to the [REDACTED], the [REDACTED], the [REDACTED] and the [REDACTED] all issued by [REDACTED] because such notes are exempt from Georgia intangible recording tax as previously determined by the Commissioner.

(3) The Georgia intangible recording tax will not be due upon the filing for record of the First Amendment with respect to the [REDACTED] issued by [REDACTED] because [REDACTED] previously paid the Georgia intangible recording tax due on such notes.

Very truly yours,



T. Jerry Jackson  
Acting Commissioner

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