

T. Jerry Jackson Commissioner Department of Rebenue State of Georgia 410 Trinity-Washington Building Atlanta, Georgia 30334 (404) 556-4015

January 4, 2000



RE: Commissioner's Determination pursuant to O.C.G.A. 48-6-71 regarding Eight and Ninth Supplemental Indenture, Dated Relating to the Grantee.

Grancee

Dear

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 of dated November 1, 1999, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Eighth and Ninth Supplemental Indenture, dated as of Relating to the

Grantor, and the instrument, the beneficial holder of which is the

Trustee, Grantee, as

respectfully, is public property and exempt from the Georgia intangible recording tax imposed by O.C.G.A. 48-6-61.

T Jerry Jackson Commissioner