



Bart L. Graham
Commissioner

State of Georgia
Department of Revenue

Suite 15300
1800 Century Boulevard
Atlanta, Georgia 30345
(404) 417-2100

July 30, 2007

[REDACTED]

Re: Commissioner's Determination pursuant to O.C.G.A. § 48-6-71, regarding the Thirty-Ninth Supplemental Indenture between [REDACTED] ([REDACTED]), Grantor, and [REDACTED] as successor to [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 July 11, 2007, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Thirty-Ninth Supplemental Indenture, between [REDACTED] ([REDACTED]), Grantor, and [REDACTED], as successor to [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