



Bart L. Graham
Commissioner

State of Georgia
Department of Revenue

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December 26, 2007

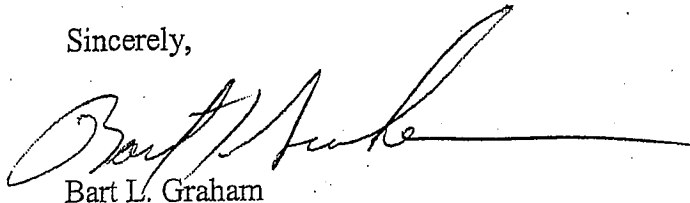
[REDACTED]
[REDACTED]
Re: Request for a Commissioner's Determination per O.C.G.A. § 48-6-71, concerning the Eighteenth Supplemental Indenture, dated as of December 1, 2007, relating to the [REDACTED] and the [REDACTED] between [REDACTED], Grantor, and [REDACTED], Trustee, Grantee

Dear [REDACTED]

In reply to your firm's 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 December 11, 2007, along with the accompanying documents, that:

The Georgia intangible recording tax will not be due upon the filing for record of the Eighteenth Supplemental Indenture, relating to the [REDACTED] and the [REDACTED] between [REDACTED] between [REDACTED], Grantor, and [REDACTED] Trustee, Grantee, 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