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Scott McCallum, Governor
Brenda J. Blanchard, Secretary

Wisconsin
Department of Commerce

March 23, 2001

The Honorable Judith Robson
Senate Chair
Joint Committee for Review
of Administrative Rules
Room 15 South, State Capitol
Madison, WI 53707

The Honorable Glenn Grothman
Assembly Chair
Joint Committee for Review
of Administrative Rules
Room 15 North, State Capitol
Madison, WI 53708

Dear Chairpersons Robson and Grothman:

The last biennial budget requested the Department of Commerce to prepare a report on interest costs in the PECFA program and to provide that report to the Joint Committee on Finance and the Joint Committee for Review of Administrative Rules. The report was to include recommendations for action that could be taken to "reduce interest costs incurred by claimants under the program under section 101.143 of the statutes including a review of schedules for making progress payments to claimants".

The Department has waited to prepare the report until it had more information on the impact of the changes that were included in the last budget bill. Changes such as the provision of bond funds to reduce the claim backlog and the implementation of additional strategies for moving sites to closure including risk based decision making have obvious impacts on interest costs and needed to be assessed. Although additional issues can always arise, we believe our report provides a snapshot of PECFA interest costs and sound recommendations for interest expense reduction.

If there are questions or items that you wish to discuss, please contact the Department so that we can provide you the information that you need.

Sincerely,

Brenda J. Blanchard
SECRETARY

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March 23, 2001

The Honorable Brian Burke
Senate Chair
Joint Committee on Finance
Room 316 South, State Capitol
Madison, WI 53702

The Honorable John Gard
Assembly Chair
Joint Committee on Finance
Room 315 North, State Capitol
Madison, WI 53702

Dear Chairmen Burke and Gard:

The last biennial budget requested the Department of Commerce to prepare a report on interest costs in the PECFA program and to provide that report to the Joint Committee on Finance and the Joint Committee for Review of Administrative Rules. The report was to include recommendations for action that could be taken to "reduce interest costs incurred by claimants under the program under section 101.143 of the statutes including a review of schedules for making progress payments to claimants".

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Sincerely,

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SECRETARY

Interest Costs Within the PECFA Program

Overview

A central tool used by the PECFA program, in accomplishing its goal of assisting site owners and operators to complete the remediation of their properties, has been the reimbursement of interest costs. The PECFA program is a reimbursement fund in that it allows an owner to apply to the fund for "reimbursement" of expenses that they incurred in conducting their remedial efforts. Because the responsible party must first complete and pay for the remedial work, it is necessary for most individuals to have a means of carrying their costs until they are able to qualify for reimbursement from the fund. Although a few individuals may have the resources to self-finance their remediations, this is certainly not the norm.

Responsible parties obtain financing to allow them to conduct their remediation and this results in loan origination fees, loan renewal fees and interest charges. In most cases, these costs are not directly paid by the borrower but rather are capitalized into the loan (paid for out of the loan commitment itself rather than the owner writing a check and paying the costs to the lending organization). The interest costs that accumulate during the life of the loan and the loan origination and renewals fees result in a total interest package that has general eligibility under the PECFA program.

Although interest reimbursement has always been an element of the PECFA program, additional attention has been directed to these costs in recent years. The increased attention resulted from the escalation in the "percentage of total costs reimbursed" by the program that are interest and other loan related costs. The trend in interest costs is illustrated by the following table:

Table 1

State Fiscal Year	Percentage of Total Program Cost
SFY 01	31.00% (July through January Information)
SFY 00	27.43%
SFY 99	18.08%
SFY 98	13.51%
SFY 97	9.91%
SFY 96	7.67%
SFY 95	8.22%

In addition to the comparison of the percent of interest costs, it is helpful to consider the growth in absolute dollars spent on interest. In SFY 95, the interest costs (including loan origination and renewal fees) totaled $5,137,980. In SFY 00, the loan cost had grown to $43,563,109. Viewed in either the context of the percentage of total costs or absolute dollars reimbursed, interest costs are an issue.

In exploring the interest issue, the PECFA program looked at a number of different topics and their relationship to the control of interest costs and the implications of making a change in current rules or practices. The core question is, can changes be made that will reduce interest or help control claimant interest costs while still allowing the program to achieve its legislative purpose.

The topics selected for discussion include:

1. Claim review backlogs and the reduction of backlogs through the use of bond funds.
2. Interest rate reimbursement levels.
3. Time to complete remediation work and the filing of claims at progress points.

Claim Review Backlog

A series of factors created the dramatic escalation in the interest costs incurred by PECFA program in the last few program years. As PECFA had warned, as early as 1991, that increasing claim demand had placed the program in a position where it was not able to fund all of the claims that were being presented to the program. The static funding available to the program was pitted against an increasing backlog starting in SFY 94. By the winter of SFY 2000, reviewed claims, which were ready for payment but could not be paid because of a lack of funds, had reached $209,000,000. This growth in the backlog was fueled by the submittal of claims that reached as high as $28,720,000 in one month.

The extraordinary level of claim demand was a result of many factors including:

- A reliance on active engineered treatment systems to remediate properties.
- The long term nature of remediations.
- A lack of tension to bring sites to closure.
- Lack of effective systems for requiring claimants and consultants to use the lowest cost remedial approach for a site.
- Lack of risk based decision making in remedial design selection and closure decisions.

This level of claim demand, when placed against the annual funding of slightly over $94,000,000 per year, resulted in a backlog of approximately 2.2 years worth of payments. Although major changes were made to the progress points at which claims could be filed with the program, claims were still being received by PECFA at over $75,500,000 per year. Given the continuing claim demand, the assumption was that if the backlog was not infinite it was at least a decade in duration.

The outgrowth of the backlog was that claimant interest costs increased substantially. The program was not able to pay down the balances that were generating the interest charges and interest expense continued to accrue and compound. Remediation work continued and the base that generated the interest charges continued to expand at the same time the fund was already over subscribed. Interest expenses continued to be capitalized into loans and the dramatic increase in interest expense that is reflected in Table 1 was created.

There were a series of responses to the claim backlog including changes in statutes and administrative rules that were aimed at additional cost control and incorporating risk analysis into remediation decisions. Also in response to the backlog was an authorization of bonding to generate the necessary funds to eliminate the backlog. In total, $270,000,000 was authorized. Subsequent to the authorization, $170,000,000 was issued through a "Revenue Bond Series A" with an interest rate of 5.53287%. An additional $80,000,000 of the remaining authorization was issued in "commercial paper" with a weighted average rate of 4.384375%. Using simple weighting based upon the volume of dollars outstanding, the blended interest cost associated with the bond funds is 4.7518%.

The bond funds provided to PECFA had a number of direct benefits. The funds:

- Reduced the financial burden on claimants by allowing them to be paid in a timely manner.
- Allowed the remediation process to continue on many sites where work had stopped or would have stopped because of a lack of reimbursements from the fund.
- Reduced the "carrying cost" of the backlog from the average interest rate on a PECFA loan to the blended bond rate of $4.7518%, which generated savings for the program.

In estimating the savings generated by the reduced rate of the bond funds, it is first necessary to determine what the blended interest rate was on the PECFA backlog. Although there is no true average interest rate on PECFA loans as rates have varied based upon administrative rule caps and the prime rate (at various points in time, interest rate reimbursement has been limited to two points over prime, one point over prime and currently one point under prime or four percent depending on the gross revenues of an applicant) it is possible to develop an approximation.

For purposes of comparison, an estimate of the average PECFA loan cost was developed by averaging 100 claims in the current claim review line. Although this sample post dates the claims paid off through bonding, information suggests that "historic" loans that date back prior to the bonding period are still moving through and that current interest rates do not vary greatly from earlier rates. Using the 100 claim sample, the average rate is 9.9225%. Comparing the blended bond rate and the derived sample demonstrates savings, in interest cost, through bonding of 5.1707%. This savings is dramatic when considering that the dollar amount of the backlog was $209,000,000 and that at least a share of that amount would have been outstanding for more than 2 years.

Another way of viewing the interest savings from the use of bond funds is by deriving the impact of bonding on future costs. In this approach we attempt to compare the cost of bonding with future PECFA costs if bonding had not been used to reduce the claim backlog. Attachment 1, to this report, is the detailed analysis of this question.

The analysis that has been prepared looks at the savings created by the $270,000,000 bond issue and the reduction in compound interest that is achieved through applying funds to a claim backlog that would have otherwise remained in place and generated additional costs for the fund. In the analysis, we project that the fund will continue to experience claim demand higher than its ability to pay (without additional bonding).

NOTE: For the purpose of the analysis, claim demand is assumed to be an average of $8,000,000 per month through 2012 and interest cost is projected at 10%. These assumptions are used for the purpose of demonstrating the costs saved through bonding and are not a formal estimate of future claim demand.

The savings generated by the bonding are measured by the amount of interest that is avoidable through 2012 based upon the bond funds being available to reduce the claim backlog. Because of the avoidance of compound interest, the savings by the end of the term are calculated to be $226,000,000.

Although different assumptions can be made regarding the rate at which claims are received, the total number of claims that will be received and the interest rate on claims, the relative savings are still significant and reflect the impact and advantage of keeping claims on a "pay as reviewed basis". The bonding not only returned funds to the claimants but also will "pay back" an additional 80% in interest savings over the course of the program.

<u>Conclusion: Maintain the claim review process on a pay as you go basis.</u>

<u>Interest Rate Reimbursement Levels</u>

One of the traditional interest cost control strategies has been placing limits on the interest rate, loan origination and renewal fees that can be reimbursed under the fund. Early in the program, the reimbursement of interest costs was allowed at 2% over prime. That early level was subsequently reduced to 1% over prime and in the last budget bill a further reduction was made to either 1% under prime or 4% depending on the gross revenues of the claimant.

Changes in interest costs that can be reimbursed have a direct impact on total program cost. The impact, however, takes a relatively long time to be observed. Because a large number of sites have existing loans at any point in time it takes an extended period for the existing loans to be fully utilized and new loans written or additions made which causes them to fall under the new caps.

The last budget bill changes are an example of the delayed impact of the interest rate caps. In a recent sample of 194 claims (included as Attachment 2), the number of sites that had loans that fell under the new interest cap provisions was very low. A total of only four sites were actually operating under the new caps. In comparison, a total of 48 sites (24.7%) were self-financing and charging no interest to the fund.

The low percentage of sites falling under the new interest provisions can be partially attributed to the bond funds and the elimination of the PECFA backlog. Paying off the backlog resulted in the rejuvenation of a number of PECFA loans that had reached their maximum limits. The bond payments resulted in freeing up room under the original loan commitment. Because a number of loans were written so that the claimant could "borrow, repay and re-borrow" paying down the loan amount resulted in claimants being able to continue on with their remediation utilizing their original loans and not being subject to the reduced reimbursement.

Although there is certainly a correlation between interest rate caps and PECFA costs, the impact is not straight line. There are also some risks associated with interest caps. The first risk is that the cap might be set too low and that lenders will move monies to other types of loans and restrict or eliminate the ability of site owners to obtain remediation loans. This risk is increased when the cap rate is set in relation to prime (e.g. 1% under prime) and prime is falling. PECFA is a reimbursement program and it relies on the claimant being able to finance the remediation. If the majority of claimants are not able to obtain loans, the remediation process comes to a stop.

A second risk is that with an interest reimbursement level keyed to large claimants (4% for those over $25,000,000 in revenues) the impact may not be reduced but rather increased interest costs. The goal of limiting interest reimbursement to the largest owners will not be achieved if the message received is that 4% interest charges are expected from the largest claimants. When 24.7% of the sites are charging no interest, a process which would shift these companies from 0% to 4% could cost the program significant dollars.

Up until the most recent changes in interest rate caps, claimants had been routinely able to obtain financing within the cap amounts. Consequently, a reduction in interest rates resulted in both a reduction in cost to the claimant and the corresponding cost to the fund. The recent cap changes, however, do not follow the same path. Although current information is limited, current lending practices appear to vary by institution. Some financial institutions are providing loans at prime or one point over prime and others appear to be making loans at one point under prime.

One of the clear goals of the last cap changes was to increase owner involvement in their remediation. This is an important goal and responds to an issue that the program has experienced throughout its history. The caps at one point under prime and 4%, however, do establish a situation where, for the first time, interest costs may be reduced to the fund but increased to the claimant.

Conclusion: Interest rate caps need to be set at levels that encourage lending to the average claimant. Exclusion of the largest companies from recovery of interest costs should be considered but the level of what constitutes "large" should be carefully considered and should not incorporate municipalities.

Progress Payments

One of the code changes made in 1998 was a modification of the points at which a claimant could apply for progress payments from the PECFA fund. Although the PECFA statute calls for claimants completing their remediation before applying for reimbursement from the fund, it did include a provision for progress payments in instances of financial hardship. In implementing this provision, the PECFA program has taken a broad interpretation of financial hardship. Only the very largest claimants are denied regular progress payments.

Although there has never been disagreement that a system of progress payments is beneficial, the question has always been what constitutes a milestone and how often on-going activities should be claimed. In 1998, when the fund was under severe financial pressure, the subject of progress payments was revisited and the system of payments modified. The 1998 changes were made to refocus attention on remediation progress (rather than on the simple spending of money) and foster a continuity of work and performance on a site. In 1998:

- The progress payment for reaching a $100,000 in expenditures was eliminated: this milestone emphasized spending money rather than remediation success.
- Two years of actual sampling, monitoring or operation and maintenance were required before a claim could be submitted. Previously the simple passage of time and not actual work qualified some sites for claim submittal.

Although the change in progress payments established a different process and focused attention on actual remediation efforts, concerns were raised on the extent to which interest costs were increased by the reduction in payments for persons who were in long term monitoring and remediation.

As a means of considering the progress payment question, we again looked at the 194 claims that had recently gone through claim review. In that review, we found that:

- 40 claims (21%) were filed within 3 months of meeting a milestone.
- 46 claims (24%) were filed within 4 to 6 months of meeting their milestone.
- 31 claims (16%) were filed within 7 to 9 months of meeting the criteria for a submittal.
- 16 claims (8%) were filed within 10 to 12 months after reaching their milestone.

- 47 claims (24%) were filed 13 to 24 months after the milestone was reached.
- 14 claims (7%) were filed two years or more after they reached their milestone.

A chart showing the time periods within which claims were filed is included as Attachment 3.

From the data that is available, it appears that interest costs could be reduced for a segment of owners by allowing claimants to file after only 1 year of monitoring or operation and maintenance. The data would seem to indicate that up to 69% of the sites could potentially reduce their interest costs by being able to claim earlier payments if they maintain their same promptness of claim submittal. This percentage, however, is overstated as a segment of owners are already provided that flexibility.

Under the current administrative rules, claimants who employ "no more than 4 individuals, who are not immediate family members, at any time during the year prior to claim submittal" are allowed to submit annually for long term monitoring and operation and maintenance. This provision allows small businesses and non-businesses to file on a yearly basis when in long term monitoring or operation and maintenance.

A second point which is key when considering the impact of a change in the progress payment schedule is that only a share of the sites, who are filing claims, are actually in long term monitoring or operation and maintenance. With the shift away from engineered treatment systems, there are significantly fewer sites with "operation and maintenance costs" to claim. For those sites in long term monitoring, this action is now generally associated with monitoring for natural attenuation and does not generate the higher dollar costs of earlier monitoring activities.

A final point to consider regarding modifying progress payment schedules is that a change will pull higher claim costs into the fiscal year in which the change is made. This will impact the dollars needed for claim payment and may put the program is a position where it will again develop a backlog of claims waiting for revenue in order to be paid. If this took place, any "savings" provided by the earlier claim filing would be negated by the delay in claim payment. In addition, sites that are not in long term monitoring or operation and maintenance could be net losers because they would not be filing their claims earlier but they could be impacted by a delay in payment.

Although it is important to consider the potential savings that might occur with earlier progress payments, it is equally important to avoid interest costs associated with the untimely filing of claims. In the sample of 194 claims, some were filed almost 3 years after they reached a milestone. This unnecessary delay clearly caused extra interest costs to be incurred.

Conclusion: Providing annual progress payments for claimants involved in long term monitoring and operation and maintenance might reduce interest costs for some owners. Any creation of a new backlog, however, would negate the interest savings and penalize the owners not in long term monitoring or operation and maintenance. Any change in progress payments must continue to make the milestone "work based" and not simply the passage of time. Interest costs can be reduced by creating a deadline for claim submittal, after a milestone is reached, that reduces or eliminates interest reimbursement if a claim is not filed in a timely manner.

Conclusions

Over the life of the PECFA program, interest costs have grown from a moderate cost tool for accomplishing the program's purpose to a very significant and expensive part of the program. This increase in interest cost can be attributed to a number of factors including the over subscription of the PECFA program and the corresponding inability to make prompt reimbursements. Also contributing to the high level of interest costs has been the frequently long time that it has taken to implement effective remedial work after the claimant secured loans.

Although interest expense has grown to higher than acceptable levels, it remains an essential part of the program. Most claimants simply do not have the ability to self fund their remediation. Without participation by lenders and attendant interest costs (and loan fees) remediations would not be moving ahead and groundwater protection would be severely reduced. Given that interest expense is a valid part of the program, actions can be taken to reduce the interest cost levels currently being experienced. Specifically, the following points should be considered:

1. Maintain the program on a pay as reviewed basis through the use of bond funds to supplement regular claim payment funds. Allowing a backlog of reviewed claims to build quickly escalates and compounds interest costs.
2. Maintain the progress payment focus on actual work performed.
3. A change to allow annual progress payments for claimants in long term monitoring and operation & maintenance is possible but there is a reduced number of claimants that will be impacted and there is the potential that some claimants might be penalized by the action.
4. Require claim submittal within a prescribed time period after a progress payment milestone is reached.
5. Set interest rate caps at levels that will maintain lending for claimants that can not self-fund their remediations.
6. Eliminate reimbursement of interest costs for the largest non-municipal claimants.

Attachment 1
Analysis of Interest Savings through use of Bond Funds

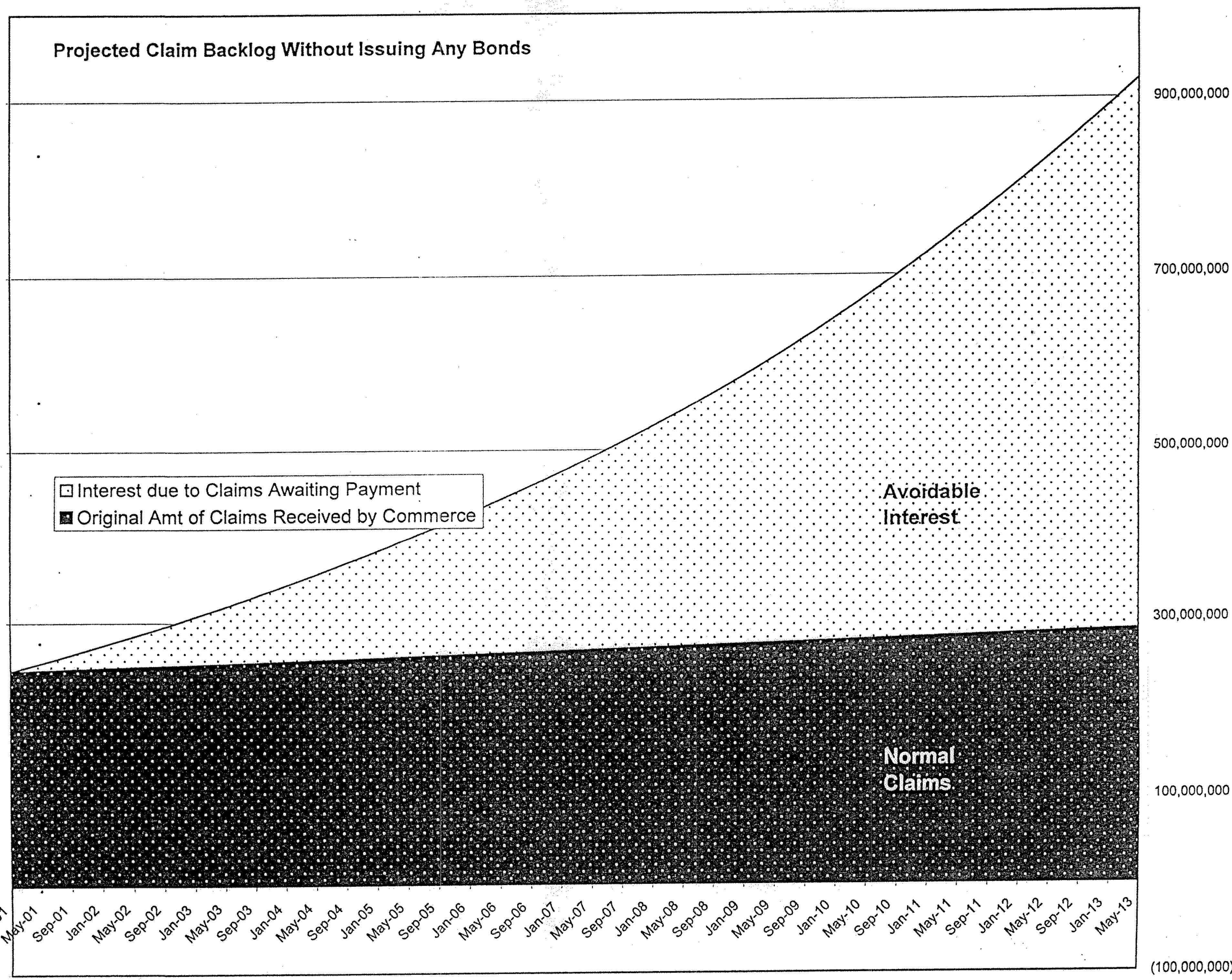
	PV 3/1/00	29-Feb-00	Mar-00	Apr-00	May-00	Jun-00	Jul-00	Aug-00	Sep-00	Oct-00	Nov-00	Dec-00	PV 2001-12
Claims Pd by Bonds	263,670,073		87,151,000	79,995,000	40,286,000	(37,168)	13,925,696	(1,654)	4,188,225	5,398,464	(1,633)	6,138,000	34,000,000
Claims Received			11,334,000	5,527,000	8,495,000	9,193,000	6,473,000	9,544,000	6,620,000	8,931,000	7,340,000	8,920,000	
Unaudited Claims	34,283,491	34,761,000	37,896,000	32,983,000	33,852,000	34,165,000	32,595,000	34,274,000	32,691,000	34,848,000	35,004,000	37,250,000	
Claims Reviewed	914,604,874	**208,997,000**	8,199,000	10,440,000	7,626,000	8,880,000	8,043,000	7,865,000	8,203,000	6,774,000	7,184,000	6,674,000	683,527,084
												avg claims recd	8,000,000
Allotment - debt serv	481,676,853		(15,629)	11,768,503	264,355	14,303,829	107,817	9,213,155	3,526,350	3,702,949	9,619,950	5,179,633	463,585,600
Allotment, $94 mill	679,049,204		7,844,000	7,844,000	7,844,000	7,844,000	7,844,000	7,844,000	7,844,000	7,844,000	7,844,000	7,844,000	656,358,687
Bond NPV 3/1/00	**66,000,000**												
Projected Backlog on 7/1/12				cost of claims	10.0%								
Bonds	(695,125,518)												
No Bonds	(921,542,503)												
DIFF DUE TO BONDS	**$ 226,000,000**												

The above time value of money assessment on the level of pure interest savings the $270,000,000 bond issue created predicts a $226 million difference in the backlog of claims on July 1, 2012; the difference is directly attributable to the bond issue and is entirely a difference in compounded interest costs.

In reaching the conclusion, for March 2000 through December 2000, actual cash flows are compared to hypothetical cash flows without the bond proceeds available.
From January 2001 through July 2012 predicted cash flows based on best available information are compared to hypothetical cash flows without the bond proceeds available.

In both scenarios the dollar amount of claims received continues to exceed the dollar amount of claims the PECFA program can pay. Because of this, in both scenarios additional interest cost will accrue on claims once Commerce has received them. These interest costs are theoretically avoidable if revenue was available to the PECFA program to immediately pay the approved claims.
The difference is the bond issuance eliminated the $209 million backlog of claims awaiting payment on 3/1/00, reducing the starting dollar amount that avoidable interest costs accrue on.
Because of the principle of compounded interest by the end of the lifetime of the bonds the difference in additional interest costs on claims awaiting payment is significant, approximately $226 million.

The above calculation contains several assumptions:
- the overall interest cost on claims is and will be 10% for the life of the bonds
- the incoming claims will stay steady at the average of March 00 - Dec 00; $8,000,000 per month
- the PECFA program has the ability to review claims as received
- the beinnial appropriation 20.143 (3) (v) will stay constant at $94,131,700 per year
- debt service on the bonds will continue to be discounted against the biennial appropriation 20.143 (3) (v)
- no more bonds will be issued beyond the currently authorized $270 million
- smoothing daily fluctuations in cash flows into monthly cash flows does not make a material difference
- no policy or program changes that materially affect program expenses or revenues will be undertaken



Projected Claim Backlog Without Issuing Any Bonds
Interest due to Claims Awaiting Payment
Original Amt of Claims Received by Commerce
Avoidable Interest
Normal Claims
900,000,000
700,000,000
500,000,000
300,000,000
100,000,000
(100,000,000)
Jan-01
May-01
Sep-01
Jan-02
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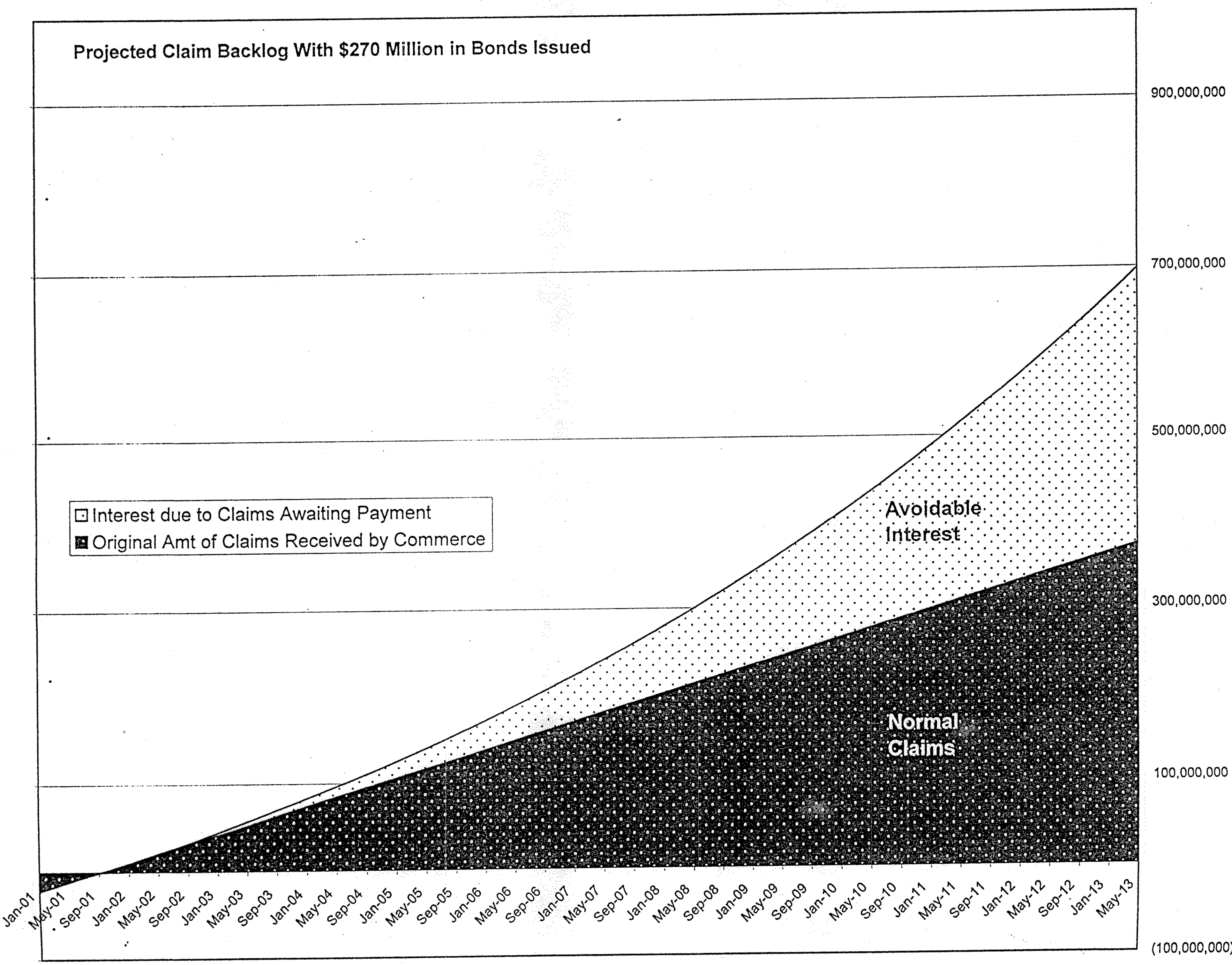

Projected Claim Backlog With $270 Million in Bonds Issued
900,000,000
700,000,000
500,000,000
300,000,000
100,000,000
(100,000,000)
Interest due to Claims Awaiting Payment
Original Amt of Claims Received by Commerce
Avoidable Interest
Normal Claims
Jan-01
May-01
Sep-01
Jan-02
May-02
Sep-02
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Attachment 2
Sample of Current Claims

Sample start date: 12/19/00
Sample end date: 1/30/01

Interest data for claims submitted

Claim Number	Milestone reached	Date milestone was reached	Date PECFA received claim	Total claim amount	Total interest claimed	Total bank fees Claimed	Most recent interest rate in	Total amount Claimed less interest/fees	% Interest
53586-9437-06	Final	6/22/00	11/1/00	$17,055.47	$0.00	$0.00	0.00	$17,055.47	0%
53233-2407-29	Final	12/9/99	10/26/00	$45,992.77	$0.00	$0.00	0.00	$45,992.77	0%
54153-9235-60	partial/ O&M	11/1/98	10/31/00	$198,575.33	$0.00	$0.00	0.00	$198,575.33	0%
54913-8300-02	Final	7/7/00	12/7/00	$7,962.03	$0.00	$0.00	0.00	$7,962.03	0%
54311-7807-24A	Final	7/7/00	11/2/00	$3,012.84	$0.00	$0.00	0.00	$3,012.84	0%
54311-7807-24B	Final	7/7/00	11/2/00	$3,672.40	$0.00	$0.00	0.00	$3,672.40	0%
24830-8915-00	Final	7/29/98	10/31/00	$23,322.06	$0.00	$0.00	0.00	$23,322.06	0%
54013-9999-03	2 YR O&M	1/1/00	11/1/00	$47,519.26	$0.00	$0.00	0.00	$47,519.26	0%
53403-2553-00-A	2 YR O&M	12/1/99	11/8/00	$38,569.52	$0.00	$0.00	0.00	$38,569.52	0%
53403-2553-00-B	Final	9/29/99	11/8/00	$24,648.30	$0.00	$0.00	0.00	$24,648.30	0%
53964-9703-26	2 yrs o&m	9/12/00	11/9/00	$99,062.73	$0.00	$0.00	0.00	$99,062.73	0%
54937-2008-09	Final	9/8/00	11/7/00	$10,223.84	$0.00	$0.00	0.00	$10,223.84	0%
54929-9209-51	Final	4/5/00	11/20/00	$7,284.44	$0.00	$0.00	0.00	$7,284.44	0%
53551-1630-32	Final	11/17/99	11/3/00	$76,753.67	$0.00	$0.00	0.00	$76,753.67	0%
53717-1603-22	Monitoring 2 Year Cycl	5/3/99	11/7/00	$51,602.62	$0.00	$0.00	0.00	$51,602.62	0%
54871-9999-74	Final	3/10/99	6/27/00	$44,497.96	$0.00	$0.00	0.00	$44,497.96	0%
54968-9999-27	Final	11/3/99	11/20/00	$29,229.95	$0.00	$0.00	0.00	$29,229.95	0%
53140-4048-01	Final	2/2/00	11/20/00	$17,600.20	$0.00	$0.00	0.00	$17,600.20	0%
53704-4403-01	Final	3/8/00	12/20/00	$13,629.90	$0.00	$0.00	0.00	$13,629.90	0%
54656-0354-40	HOME O&M 1 yr	6/1/00	12/27/00	$1,349.50	$0.00	$0.00	0.00	$1,349.50	0%
53233-2409-38-A	Final/CLOSED	12/3/99	10/9/00	$38,249.28	$0.00	$0.00	0.00	$38,249.28	0%
53233-2409-38-B	Final/CLOSED	12/3/99	10/9/00	$55,493.42	$0.00	$0.00	0.00	$55,493.42	0%
54901-6451-24	SI	8/24/00	11/22/00	$37,134.27	$0.00	$0.00	0.00	$37,134.27	0%
54950-9999-25	Final	7/18/00	11/22/00	$26,649.10	$0.00	$0.00	0.00	$26,649.10	0%
53066-3040-02	Final	11/4/98	11/22/00	$42,549.44	$0.00	$0.00	0.00	$42,549.44	0%
54956-2614-04	Final	12/10/97	11/27/00	$35,270.96	$0.00	$0.00	0.00	$35,270.96	0%
54546-0107-06	Closed Remedial Actio	3/3/00	11/16/00	$56,200.88	$0.00	$0.00	0.00	$56,200.88	0%
53114-1532-25	Final	11/29/00	12/27/00	$16,316.11	$0.00	$0.00	0.00	$16,316.11	0%
53208-2122-02	partial	1/31/00	10/20/00	$80,977.80	$0.00	$0.00	0.00	$80,977.80	0%
54729-9999-03	Final	6/12/00	11/29/00	$19,726.52	$0.00	$0.00	0.00	$19,726.52	0%
53051-6102-66	Final	5/22/98	11/29/00	$14,689.40	$0.00	$0.00	0.00	$14,689.40	0%
54017-7233-29	Final	10/6/00	12/26/00	$11,894.38	$0.00	$0.00	0.00	$11,894.38	0%
54495-3346-40	O&M 2 yr cycle	9/1/99	11/30/00	$23,444.16	$0.00	$0.00	0.00	$23,444.16	0%
53029-1927-00	Final	11/30/99	12/1/00	$33,598.44	$0.00	$0.00	0.00	$33,598.44	0%
53703-2344-23	Final	11/11/99	12/1/00	$16,512.30	$0.00	$0.00	0.00	$16,512.30	0%
53225-300800A	Final	3/8/00	11/30/00	$6,586.50	$0.00	$0.00	0.00	$6,586.50	0%
53225-3008-00B	Final	3/8/00	11/30/00	$71,806.91	$0.00	$0.00	0.00	$71,806.91	0%
53221-3615-05	Final	8/8/00	12/4/00	$10,087.75	$0.00	$0.00	0.00	$10,087.75	0%
54401-2761-19	Final	11/2/99	11/29/00	$86,942.21	$0.00	$0.00	0.00	$86,942.21	0%

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Sample end date: 1/30/01

54732-0576-01B	Final	4/6/00	1/2/01	$22,543.48	$0.00	$0.00	0.00	$22,543.48	0%
53919-9503-70	Final	5/5/00	1/5/01	$8,589.25	$0.00	$0.00	0.00	$8,589.25	0%
54304-3592-01	Closed	11/19/99	12/7/00	$7,824.90	$0.00	$0.00	0.00	$7,824.90	0%
53575-1409-21	Final	9/26/00	12/5/00	$63,117.85	$0.00	$0.00	0.00	$63,117.85	0%
54745-0252-00	O&M	4/1/00	12/7/00	$52,225.13	$0.00	$0.00	0.00	$52,225.13	0%
54703-3110-04B	Final	3/1/00	11/24/00	$6,921.55	$0.00	$0.00	0.00	$6,921.55	0%
54220-2398-05	final	9/5/00	1/10/01	$33,802.12	$0.00	$0.00	0.00	$33,802.12	0%
53538-2636-12	o/m	12/5/99	12/8/00	$58,358.22	$0.00	$0.00	0.00	$58,358.22	0%
54136-1219-03	closed remedial action	10/28/99	12/11/00	$30,749.42	$0.00	$0.00	0.00	$30,749.42	0%
54467-9999-01	Final	10/5/99	12/11/00	$37,896.35	$392.72	$927.00	4.00	$36,576.63	1%
54552-1922-51	SI/RAP	4/27/99	10/30/00	$40,583.32	$952.75	$2,313.29	8.75	$37,317.28	2%
53964-9037-12	Final	5/16/00	10/30/00	$10,954.62	$651.01	$8.00	9.00	$10,295.61	6%
53818-1348-41	Final	6/8/00	11/13/00	$13,990.63	$940.70	$0.00	9.50	$13,049.93	7%
54728-9999-16	Final	7/11/00	1/3/01	$48,111.89	$3,165.27	$800.00	7.5 orig 9.75	$44,146.62	7%
54217-9122-85	Final	3/15/99	9/11/00	$26,691.47	$2,195.86	$742.00	10.50	$23,753.61	8%
54656-8152-37	Final	1/25/00	10/19/00	$8,777.85	$816.63	$0.00	10.50	$7,961.22	9%
54180-1132-90	Final	8/3/00	12/11/00	$18,083.55	$1,549.52	$867.00	9.00	$15,667.03	9%
53126-9790-10	2 yrs O&M	8/21/00	11/6/00	$77,248.61	$7,285.00	$2,890.36	10.00	$67,073.25	9%
54512-9719-20	RAP	5/9/99	11/13/00	$40,862.18	$4,055.62	$1,423.80	9.75	$35,382.76	10%
53923-9680-42	Final	7/28/00	10/23/00	$41,504.29	$3,949.70	$1,140.26	10.50	$36,414.33	10%
54180-1060-25	Final	8/22/00	12/8/00	$31,484.11	$3,075.20	$1,268.00	9.00	$27,140.91	10%
54124-9376-00	SI	3/23/00	12/4/00	$46,309.80	$4,549.96	$1,762.54	10.00	$39,997.30	10%
54872-8216-97	Final	10/5/00	1/5/01	$79,993.46	$8,060.27	$3,198.01	9.50	$68,735.18	10%
53558-9446-19	Final	7/12/99	11/2/00	$16,029.11	$1,759.73	$505.40	8.50	$13,763.98	11%
54521-8852-43	Final	2-29-99	12/11/00	$14,134.62	$1,569.16	$1,008.00	9.00	$11,557.46	11%
54560-9630-21	Final	11/27/00	1/5/01	$17,141.23	$1,888.25	$1,387.98	10.00	$13,865.00	11%
54027-2451-31	Final	9/26/00	11/28/00	$47,506.82	$5,808.73	$0.00	9.50	$41,698.09	12%
53147-9999-01	Final	8/14/00	11/2/00	$59,835.04	$7,297.94	$2,807.28	10.50	$49,729.82	12%
54162-9601-71	O & M	9/1/00	11/15/00	$140,536.06	$16,812.23	$4,823.53	10.50	$118,900.30	12%
54935-4905-21	Final	11/9/00	12/8/00	$86,254.31	$10,131.34	$3,358.25	10.50	$72,764.72	12%
54401-5297-09	Final	6/23/00	11/29/00	$23,552.79	$3,019.64	$1,428.00	10.00	$19,105.15	13%
54703-5975-01	2 yr o&m	7/1/99	12/8/00	$37,990.37	$5,019.06	$0.00	8.5 note 4% max.	$32,971.31	13%
53214-5144-30	O&M	9/1/99	10/20/00	$21,054.65	$2,999.86	$426.00	10.50	$17,628.79	14%
54843-9260-44	Final	10/10/00	12/27/00	$45,006.27	$6,243.10	$1,518.28	10.00	$37,244.89	14%
53214-5144-30	2 yrs monitoring	9/1/99	10/28/00	$21,359.70	$3,304.91	$426.00	11.50	$17,628.79	15%
53038-9755-94	Final	8/22/00	11/16/00	$29,059.59	$4,499.65	$1,624.57	10.50	$22,935.37	15%
54732-9999-20	Final	8/5/99	1/2/01	$75,672.89	$11,246.62	$637.50	8.5 note 4% max.	$63,788.77	15%
54113-1049-25	Final	6/4/99	11/8/00	$88,632.54	$14,268.20	$1,100.00	11.00	$73,264.34	16%
53002-9784-61	lender terminated fund	12/7/00	12/14/00	$50,074.89	$8,193.57	$3,019.32	9.00	$38,862.00	16%
54915-999-81	closed	12/1/98	12/5/00	$40,331.16	$6,478.36	$599.00	10.50	$33,253.80	16%
54446-9439-10	FINAL	11/17/99	1/8/01	$48,741.06	$7,721.89	$0.00	10.00	$41,019.17	16%
53120-2562-44	final	12/23/99	12/27/00	$51,562.30	$8,291.84	$2,102.49	9.50	$41,167.97	16%
54401-4228-11	final	1/27/00	1/12/01	$43,458.93	$7,034.90	$1,902.06	9.50	$34,521.97	16%

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53923-9680-42	Final	7/28/00	10/23/00	$44,794.01	$7,540.51	$839.17	10.50	$36,414.33	17%
53139-9515-07	Final	7/14/00	12/27/00	$54,907.27	$9,092.11	$0.00	8.50	$45,815.16	17%
53139-9591-08	Final	7/14/00	12/27/00	$51,573.74	$8,859.18	$0.00	8.50	$42,714.56	17%
54495-7839-11	Final	9/11/00	11/30/00	$59,453.30	$10,490.26	$0.00	10.00	$48,963.04	18%
53212-3865-16	SI completed/out to bid	10/28/98	10/23/00	$40,446.44	$7,438.27	$2,069.37	10.00	$30,938.80	18%
54301-4512-12	Final	6/19/00	12/7/00	$75,050.24	$13,309.34	$3,157.20	10.50	$58,583.70	18%
53035-9747-45	SI	8/28/00	11/14/00	$55,259.69	$9,838.94	$1,685.67	10.50	$43,735.08	18%
54725-9999-08	Final	9/15/00	12/28/00	$39,506.11	$7,001.59	$1,628.25	10.00	$30,876.27	18%
54302-3248-78	Final	10/11/00	1/5/01	$30,129.24	$5,488.97	$0.00	9.75	$24,640.27	18%
54220-6331-46A	Final	4/29/00	11/20/00	$81,103.18	$14,719.70	$3,232.52	9.50	$63,150.96	18%
54220-6331-46B	Final	4/29/00	11/20/00	$69,497.66	$12,641.36	$3,089.87	9.50	$53,766.43	18%
54313-8903-51	Final	6/13/00	12/5/00	$73,895.16	$14,064.38	$575.86	10.50	$59,254.92	19%
54470-9733-77	Monitoring 2-yrs	3/20/00	10/17/00	$96,368.72	$18,369.49	$0.00	10.00	$77,999.23	19%
54017-7603-01	Impl& 2 yrs o&m	9/30/00	11/20/00	$132,779.51	$25,377.37	$0.00	10.00	$107,402.14	19%
54732-0576-01	Final	8/5/99	1/2/01	$10,382.58	$1,984.69	$112.50	8.5 note 4% max.	$8,285.39	19%
54470-9733-77	Monitoring 2-yrs	3/20/00	10/17/00	$96,368.72	$18,369.49	$0.00	10.00	$77,999.23	19%
53217-2539-25	Final	8/7/00	11/13/00	$30,552.34	$6,029.74	$3,111.80	9.00	$21,410.80	20%
54166-2204-40	Final	7/14/00	12/6/00	$91,620.92	$18,428.89	$2,348.37	10.50	$70,843.66	20%
54520-1243-00	Final	5/15/00	11/29/00	$15,622.46	$3,054.35	$440.00	10.00	$12,128.11	20%
54601-8225-05	O/M	9/7/00	11/30/00	$232,876.69	$48,305.22	$0.00	8.50	$184,571.47	21%
53959-1451-75	Final	10/5/99	1/8/01	$36,310.04	$7,581.77	$1,743.20	9.50	$26,985.07	21%
54534-10-1901	RA plus 2 yrs O&M	8/18/00	12/7/00	$351,489.89	$72,662.54	$0.00	9.10	$278,827.35	21%
54481-3657-24	CLOSED REM ACTION	2/23/00	2/14/00	$36,801.35	$7,831.19	$900.00	10.00	$28,070.16	21%
53714-1826-30	2yrs O & M	8/18/00	10/27/00	$144,611.97	$30,609.50	$4,800.00	12.00	$109,202.47	21%
54915-7718-20	Final	7/28/00	12/20/00	$42,178.49	$9,487.42	$552.95	10.00	$32,138.12	22%
53221-1703-01	Final	5/24/00	10/23/00	$69,821.43	$15,773.05	$3,287.18	10.00	$50,761.20	23%
54911-4724-40	Final	4/26/00	10/24/00	$68,879.70	$15,568.90	$2,834.12	10.50	$50,476.68	23%
53711-1703-02	Final	7/13/00	10/31/00	$63,312.38	$14,277.22	$3,037.45	9.00	$45,997.71	23%
54143-2016-11	Final	4/6/00	12/21/00	$52,695.01	$12,171.38	$0.00	10.75	$40,523.63	23%
53963-9801-28	Final	6/23/00	10/10/00	$75,175.10	$17,349.04	$850.00	10.00	$56,976.06	23%
53039-1202-12	SI	8/3/98	11/22/00	$89,065.97	$20,640.98	$750.00	prime/variable	$67,674.99	23%
53403-3340-01	Final	10/6/00	11/20/00	$40,452.22	$9,401.00	$843.08	11.00	$30,208.14	23%
53913-2106-05	2 yr O&M	6/30/00	11/28/00	$410,788.90	$98,396.23	$11,506.16	9.25	$300,886.51	24%
54455-1440-24	Final	6/12/00	11/28/00	$56,252.69	$13,228.02	$765.51	11.00	$42,259.16	24%
53020-0248-94	Final	10/1/00	12/1/00	$9,452.79	$2,252.32	$0.00	10.50	$7,200.47	24%
53110-3032-72	closed remedial action	11/2/99	10/23/00	$144,336.56	$34,200.73	$4,220.47	9.75	$105,915.36	24%
54638-9999-05	Financial Hardship	7/17/98	11/16/00	$304,447.86	$75,818.33	$0.00	7.75	$228,629.53	25%
53955-9999-18a	Closed Remedial Actio	9/12/00	11/30/00	$102,494.26	$25,149.32	$1,133.19	10.50	$76,211.75	25%
53955-9999-18b	Closed Remedial Actio	9/12/00	11/30/00	$14,438.57	$3,635.51	$163.81	10.50	$10,639.25	25%
54893-8015-61	2 yr o&m/actually 3 yrs	11/1/98	12/11/00	$183,714.48	$45,017.76	$0.00	10.50	$138,696.72	25%
54950-9754-40	Final	8/29/00	10/17/00	$177,077.35	$45,418.44	$1,262.93	10.50	$130,395.98	26%
53804-9792-61	Final	10/16/00	10/24/00	$60,470.10	$15,646.34	$0.00	8.50	$44,823.76	26%
53965-9104-33	Final	3/23/98	11/16/00	$11,653.07	$3,068.87	$0.00	9.50	$8,584.20	26%

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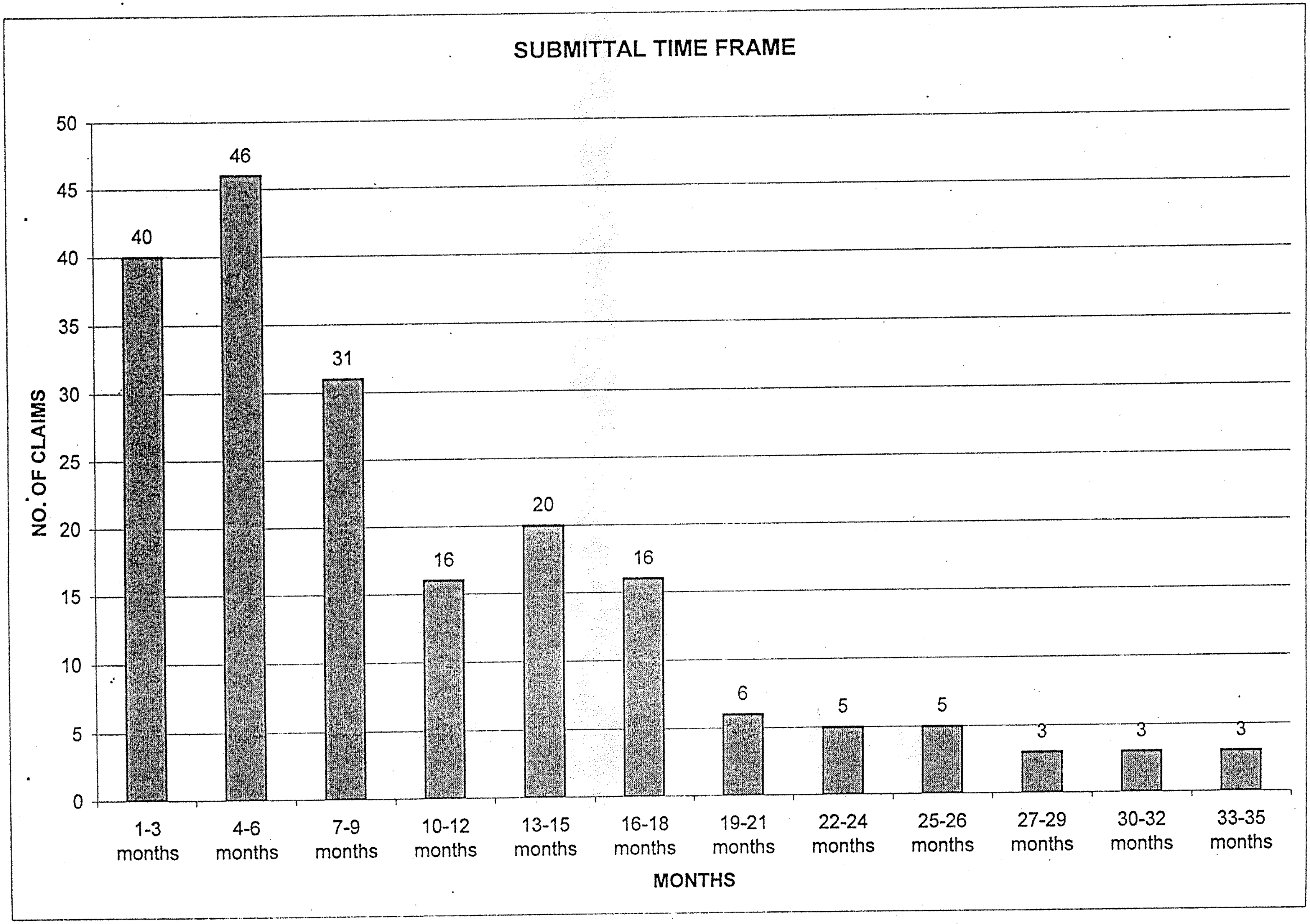
54119-9220-92	2 Years O & M	7/27/00	12/7/00	$207,550.84	$54,456.69	$5,484.51	10.50	$147,609.64	26%
53032-9709-92	Closure	10/19/00	12/6/00	$46,429.65	$11,855.45	$0.00	8.50	$34,574.20	26%
53939-9999-21	2-yr monitoring	1/1/00	10/24/00	$107,807.76	$29,279.05	$0.00	10.75	$78,528.71	27%
54130-9999-79	Final/NFA	12/10/97	11/20/00	$86,568.14	$23,419.82	$825.88	8.75	$62,322.44	27%
54914-3251-25	Final	6/16/99	10/18/00	$117,828.71	$33,167.27	$5,156.11	9.50	$79,505.33	28%
53943-9781-77	Final	10/11/00	11/29/00	$65,414.85	$18,563.91	$1,617.44	11.50	$45,233.50	28%
54914-3909-39	Final	1/6/00	11/6/00	$175,506.30	$49,228.36	$4,826.39	10.50	$121,451.55	28%
53080-2016-20	Final	6/15/00	10/24/00	$56,879.29	$16,202.00	$2,186.43	9.25	$38,490.86	28%
54512-9999-09	Final	6/9/00	7/17/00	$380,385.39	$113,532.21	$12,648.81	10.50	$254,204.37	30%
54610-9999-15	Final	7/21/00	10/19/00	$36,777.58	$11,092.72	$250.79	11.50	$25,434.07	30%
54968-9999-02B	Final	7/7/99	11/15/00	$101,713.51	$30,486.85	$2,293.15	11.00	$68,933.51	30%
53209-6516-27	SI/RAP	3/20/98	11/8/00	$49,581.30	$15,129.65	$3,480.21	8.75	$30,971.44	31%
54220-3319-01	Final	4/26/00	10/23/00	$82,484.52	$25,638.40	$0.00	10.50	$56,846.12	31%
54701-9680-51	Final	8/24/98	10/9/00	$179,566.72	$57,576.85	$0.00	9.00	$121,989.87	32%
54479-9525-09	Final	1/27/00	10/12/00	$85,497.60	$27,416.94	$1,135.01	8.00	$56,945.65	32%
54843-8324-63	SI	11/5/99	10/31/00	$66,500.32	$21,487.82	$5,106.38	11.50	$39,906.12	32%
53207-6286-00	Final	7/15/99	10/30/00	$14,951.58	$5,157.16	$0.00	10.50	$9,794.42	34%
53530-9756-28	Final	6/22/00	11/2/00	$7,116.27	$2,443.62	$0.00	9.50	$4,672.65	34%
53207-6286-00	Final	7/15/99	9/29/00	$14,951.58	$5,157.16	$0.00	9.00	$9,794.42	34%
54935-2473-71	Final	6/2/00	12/1/00	$104,300.99	$35,903.84	$0.00	8.50	$68,397.15	34%
53139-9707-11	Closed Remedial Actic	3/5/99	11/29/00	$192,475.70	$65,558.56	$3,885.00	10.50	$123,032.14	34%
54235-9324-96	Final	7/31/00	12/14/00	$23,701.09	$8,192.42	$0.00	10.00	$15,508.67	35%
53597-1102-04	2 yr O & M Cycle	10/31/99	12/5/00	$71,745.89	$25,689.99	$4,450.00	9.25	$41,605.90	36%
54911-3907-39	closure	10/11/00	11/21/00	$29,530.59	$10,952.49	$739.21	10.50	$17,838.89	37%
53934-9637-28	Final	3/31/00	10/18/00	$54,305.50	$20,827.33	$1,794.38	11.50	$31,683.79	38%
53223-3714-85a	closure	2/8/00	11/2/00	$30,442.67	$11,695.41	$0.00	10.00	$18,747.26	38%
54971-0245-03	Final	9/8/00	12/8/00	$105,114.49	$40,223.89	$1,935.62	9.50	$62,954.98	38%
53072-3435-21	Final	12/6/99	5/5/00	$86,182.40	$33,293.43	$294.00	10.00	$52,594.97	39%
54304-4799-05	Final	3/27/00	10/19/00	$190,001.29	$76,674.02	$12,080.48	11.50	$101,246.79	40%
54981-1517-19	Final	6/19/99	11/20/00	$68,587.35	$27,521.95	$0.00	10.50	$41,065.40	40%
53142-3701-03	O & M	3/17/00	11/6/00	$200,614.18	$82,205.50	$2,750.00	9.75	$115,658.68	41%
53051-9999-33	Final	5/18/00	11/9/00	$102,807.74	$42,082.63	$0.00	7.75	$60,725.11	41%
53716-4805-80	Final	9/26/00	11/29/00	$70,372.48	$29,010.81	$7,778.00	11.00	$33,583.67	41%
54568-9586-45	Final	9/15/00	11/6/00	$80,442.68	$33,325.67	$1,756.11	10.00	$45,360.90	41%
54140-1850-41	2 yr o&m	5/24/00	11/20/00	$51,807.08	$21,600.10	$0.00	11.50	$30,206.98	42%
53144-4144-16	Final	3/8/00	11/13/00	$31,605.81	$14,047.77	$1,698.39	9.00	$15,859.65	44%
54956-3008-26	o&m	12/1/97	11/13/00	$155,073.01	$56,010.28	$0.00	10.50	$99,062.73	45%
53704-4725-50	Final	7/25/00	11/27/00	$101,743.92	$45,393.24	$5,196.72	10.00	$51,153.96	45%
23074-1043-05	Final	7/21/99	11/24/00	$93,469.68	$41,638.55	$0.00	8.50	$51,831.13	45%
53076-0128-85	CLOSED REM ACTION	6/5/00	12/6/00	$29,510.16	$13,409.24	$0.00	10.25	$16,100.92	45%
54481-5359-97	Final	4/17/00	10/24/00	$44,713.78	$20,644.13	$3,421.39	10.00	$20,648.26	46%
54230-0149-05	Final	5/3/00	10/1100	$79,951.30	$37,871.40	$0.00	10.50	$42,079.90	47%
53527-9999-78	Final	3/22/00	10/30/00	$173,038.14	$81,343.96	$12,286.98	11.50	$79,407.20	47%

Interest data for claims submitted

Sample start date: 12/19/00
Sample end date: 1/30/01

53034-9999-66	Final	5/2/00	10/26/00	$97,271.48	$47,316.07	$6,000.00	7.75	$43,955.41	49%
53105-1541-00	Closed/NFA	11/30/99	12/8/00	$42,336.02	$20,641.84	$3,555.07	9.25	$18,139.11	49%
54136-1420-03	Final	8/16/00	12/4/00	$96,839.72	$48,006.61	$6,529.48	10.50	$42,303.63	50%
54971-9527-96	Final	8/25/99	10/31/00	$129,743.96	$66,024.92	$2,843.76	9.00	$60,875.28	51%
53597-9137-05	O & M	5/25/00	10/31/00	$85,181.20	$43,125.20	$3,501.75	10.00	$38,554.25	51%
53146-1703-30	closed	7/12/00	12/7/00	$364,810.53	$190,920.08	$18,581.81	10.50	$155,308.64	52%
54303-4099-56	Final	7/23/99	10/17/00	$80,103.79	$43,215.45	$3,823.55	11.50	$33,064.79	54%
53558-9432-16	Final	8/29/00	11/30/00	$94,568.06	$51,173.40	$2,966.05	10.00	$40,428.61	54%
53115-1915-33	Final	3/20/00	11/28/00	$51,175.22	$27,949.07	$3,398.47	10.00	$19,827.68	55%
54968-9999-02	Final	2/24/00	12/11/00	$52,816.27	$29,326.60	$2,293.15	10.00	$21,196.52	56%
53933-9622-30	Final	3/13/00	11/14/00	$25,798.39	$14,802.81	$385.05	10.00	$10,610.53	58%
54301-3396-69	Final	8/14/00	11/9/00	$62,697.90	$37,867.41	$1,878.49	10.50	$22,952.00	60%
54422-8824-29	O&M	5/15/00	11/6/00	$17,050.32	$10,259.42	$1,442.80	9.25	$5,348.10	60%
54001-4816-01	Final	8/25/00	11/10/00	$42,630.49	$25,949.93	$0.00	10.00	$16,680.56	61%
54115-1202-48A	Final	7/20/00	10/19/00	$51,119.47	$31,171.60	$0.00	8.50	$19,947.87	61%
53951-9998-00	Final	7/26/99	11/22/00	$28,079.35	$17,168.67	$1,213.03	9.50	$9,697.65	61%
54467-9518-54	Final	2/25/99	11/30/00	$50,052.67	$30,381.94	$648.92	8.50	$19,021.81	61%
54220-5699-05	Final	6/27/00	10/23/00	$70,626.83	$43,774.64	$3,990.13	11.50	$22,862.06	62%
54115-1202-48A	Final	7/20/00	10/19/00	$51,819.92	$31,872.05	$0.00	8.50	$19,947.87	62%
53214-1550-79	Final	1/1/99	11/3/00	$23,953.60	$15,446.10	$0.00	11.50	$8,507.50	64%
53014-9999-11	closed	7/22/99	11/13/00	$71,090.64	$48,048.81	$1,000.00	10.00	$22,041.83	68%
54126-9406-38	Final	4/6/00	11/6/00	$63,166.40	$44,930.45	$1,589.04	10.00	$16,646.91	71%
53715-1890-22	Final	3/18/99	11/15/00	$78,171.69	$55,955.50	$3,300.00	10.00	$18,916.19	72%
53125-9999-26	Financial Hardship/O&	2/5/99	10/30/00	$39,151.99	$28,267.84	$4,401.37	9.00	$6,482.78	72%
54986-0450-40	Final	4/5/00	11/22/00	$70,483.34	$51,610.30	$0.00	11.00	$18,873.04	73%
53225-3724-31	Closed	9/8/99	12/5/00	$132,271.88	$108,564.31	$7,266.34	8.75	$16,441.23	82%

Attachment 3
Claim Submittal Time Frames


SUBMITTAL TIME FRAME
NO. OF CLAIMS
50
45
40
35
30
25
20
15
10
5
0
40
46
31
16
20
16
6
5
5
3
3
3
1-3 months
4-6 months
7-9 months
10-12 months
13-15 months
16-18 months
19-21 months
22-24 months
25-26 months
27-29 months
30-32 months
33-35 months
MONTHS

Diplomatic Mail

22 May Ø1

The Honorable, Judy Robson
— State Senator —
State Capitol / Room 15 South
U.S. Post Office Box № 7882
Madison, Wisconsin, USA (53707.7882)

IN THE MATTER OF: State Criminal Activities, INTER ALIA ___

Dear Senator Robson:

Now that our Intel Groupe has been interviewed ___ and ___ Austrian affidavits have been received by the U.S. federal Government, and your State Agencies ___ by International & Domestic Journalists in preparation for their News Release, may I take this opportunity to Alert your good offices of the very real State Government Scandal & Exposé . . . .

Please take a little time to review the following, and then communicate with the listed Corporate Personnel;

1.) HTTP://WWW.SKOLNICKSREPORT.COM/MRICH.HTML
"MARC RICH IS CIA RICH," 1/26/01

2.) HTTP://SKOLNICKSREPORT.COM/MR fingered.HTML
"MARC RICH AND OTHERS --- fingered by a letter," 2/28/01

I. FOR U.S. GOV'N EXHIBITS, Related documentation, U.S. DISTRICT COURT CASE № CV-99-1914-C, ETC. ___ PLEASE CONTACT THE Following:

A) ATTORNEY PATRICIA CAMERON (949.831.7517)
B) ATTORNEY JAN MORTON HEGER (949.249.9170)

II. CORPORATE FINANCE DIRECTORS ~
1.) REVEREND FATHER JOHN A. O'BRIEN (314.922.9080)
2.) AMBASSADOR EVA S. TELEKI (301.972.2364)
3.) CEO, JACK RICHARDS (405.840.9966)

III. CORPORATE FINANCIAL ADVISORS ~
1.) TOM HENEGHAN (708.423.2573)
2.) LEE WILLIAMS (847.882.5279)
3.) GERALD SALCHERT (920.999.5020)

IV. MERRIMACK College, Professor DAN TAMBASCO (978.475.4755)

V. PAST STATE, federal, diplomatic, foreign References Readily Available to openly SUPPORT my TRUTHFUL ACTIVITIES & diplomatic COMMUNICATIONS.

THANK YOU FOR YOUR UNDERSTANDING
— AND — HEADS UP !!

SINCERELY YOURS,

AMBASSADOR [signature]
DIPLOMATIC PASSPORT No 04362 & 12535
MINISTRY OF FOREIGN AFFAIRS
INVESTITURED: PARIS, FRANCE // JUNI, 1993

CC: THE HON., GEORGE W. BUSH, JR.
THE HON., DICK CHENEY
THE HON., JOHN ASHCROFT, ET AL

LEO WANTA (303787)
FLCI 2B/40B
P.O. BOX # 147
FOX LAKE, WISCONSIN, USA
53933.0147

FOX LAKE, WI
JUN 2
2001
53933

THE HONORABLE, JUDY ROBSON
WISCONSIN STATE SENATOR
STATE CAPITOL / ROOM 15 SOUTH
U.S. POST OFFICE BOX No 7882
MADISON, WISCONSIN, USA
(53707.7882)

RE: U.S. DEPT. OF THE TREASURY
LEE E. WANTA (S-31-IANO)
OFFICE OF INTERNAL AFFAIRS
FRANK B. INGRAM (FBI/SA32NV)
[illegible]

STEPHEN W. JONES,
Plaintiff,

V. CIVIL CASE # ______________

YVETTE DUESTERBECK, WDOC Employee.
H. BLOYER, Registrar, "
hompe, A-Unit, SMCI "
G. Berge, Warden, SMCI "
And
J. Doe #1, Bussiness Office Dir. WDOC Employee
Jane Doe # 1, "
And
John. Doe # 1. Office of Legal Counsel, WDOC
Defendants.

LETTER - GRIEVANCE OF ONE: STEPHEN W. JONES

TO THE HON. J. B. ROBSON
WI STATE SENATOR, STATE CAPITOL
P.O. BOX 7882, MADISON, WI 53707-7882

DEAR SEN.

You are not the typical individual to formally write to about a prisoner grievance; however, with respect to around six open records requests to H. Bloyer, SMCI Registrar, atleast four or maybe five legal loan requests accompanying those was referred to hompe, SMCI Alpha Unit for his approval per Department of Correction (DOC) Administrative Code 309.51.

H. Bloyer, wished to have his signature as opposed to the unit 3rd shift sergeant on duty who usually takes care of all other similar responsibilities -- a deley or delays took course since my first request dated December 28, 2000, Through Febuary 12, 2001 -- then, on or about Febuary 12, 2001 an Inter-office memo was sent to me from Y. Duesterbeck, SMCI Record Office stating:

"In recent discussion with Office of Legal Counsel, it was brought to our attention that the cost of Open Records Requests cannot be paid for by debts to your legal loan. Therefore, your recent Open Records request is being returned to you without action."

Febuary 14, 2001
Letter-Grievance
TO: HONORABLE SEN. J. B. ROBSON
Page Two

cc: Unit Manager hompe
Wardens Office
ICE Office

Just to fill You in, the record reques mentioned copies of any and all DOC-112 DOC-112'A maintained while I was on C Status and Observation from July 23, through August 31, 2000 and, names the institution Preview Committee memb who demoted me from step 2 to on 12/15/00. With respect to the f requests they are Logs kept on inmate while either on Observation status, or The Law in Wisconsin under the Open R section 19.37(1) will not permit me file a Petition For A Writ of Mandamus Oral denial. The Latter record reque to H. Bloyer (not necessarily in that orde asked about the Preview meeting since (Stephen W. Jones # 197264) was persona a subject of the same; ironically, I wrote to the social worker, hompe, n only they turned me away with callou but, however, so did the shift se too. Needless to say, so is H. Bloye using the office of records to so do.

Therefore, my doc Complaints will through the systemic cracks as the Febuary 12, 2001 Correspondence Memo has been already sent to the Ins Inmate Complaint Department (ICE) from Record Office.

Febuary 14, 2001
Grievance
TO: Hon. Senator J.B. ROBSON
Page Three

Basically, those inmate complaint on file with SMCI discussed what my Letter previously mentioned in that H. was not happy with the requests re to Hompe, who sat on the DOC-184 or did not sign one until 1-7-01, e

When I originally signed the Le Loan Agreement per Funds for Legal C ondence and Copying, it was my be as well as understanding inmates cou be provided record requests; and th filing open records requests. Not o did H. Bloyer not fill the record requ but also, H. Bloyer did not state wit <u>sufficient</u> <u>specificity</u> required by t Wisconsin Statutes here reason for th denial via the Record Request Respo DOC Form so that I could appeal th denial to the Department of Correction Record Custodian, Mr. Wm. D. Ridgely. I await his reply to a Letter recen sent regarding H. Bloyers inactions.

Moreover, the Legal Loan Policy is in my guesstimation, ambiguous, it sim

> " The Division of Adult Institutions shall l to $200 annually to indigent inmates for photocopies and postage to allow them ac the courts for Litigation related to th cases.

DOC-864 I.M.P. Proc. #: DOC 309 IMP 29, 1. 1 of 12-1-00.

Febuary 14, 2001
Letter - Grievance
TO: Honorable Sen. J. B. ROBSON
Page Four

Everysince entering the WSP syste
and /or. applying for a Legal Loan fo
submitting Legal correspondence, Laws
Complaints whatever to the state o
other Courts, copying institution rec
were approved... Columbia C.I.; Gr
Bay C.I.; and Waupun C.I.; now th
I have an investigation of medical
complaints, I would appreciate ha
the DOC-112 and DOC-112A's for
Legal purposes related to my own ca

I assert that H. Bloyer and so
body else used the definitions of
Photocopies stated in The DOC-864
a catalyst for the denial; which i
way is not a proper record respo
under the Open Records law statute

My remaining questions are as
Am I within the guidelines under DOC 3
29 per my record request for copies
if so, how can I re-assert my reco
requests and get either the copie
a proper Record Request Request in
to proceed on appeal to Mr. Wm. D. R

Your attention to this letter has been
upstanding and appreciate by one:

Stephen W

SMCI Resi.

Cc: Hon. J.B. Robson, WI Senator
sincerely / copied

JONES, STEPHEN W. #197264
Supermax Corr. Inst. (SMCI)
P.O. Box 9900
Boscobel, WI 53805-9900

MADISON WI
PM
FEB
BOSCOBEL
FEB 15'01
WI
U.S. POSTAGE
0.34
METER
6068489

THIS LETTER HAS BEEN
MAILED FROM THE
WISCONSIN PRISON SYSTEM

The Honorable Ms. J.B. ROBSON
WISCONSIN SENATOR,
Chairman of The WI Administrative Rules
Committee per the Department of
Corrections.
C/O STATE CAPITOL, P O BOX 7882
MADISON, WI 53707-7882

Writing Materials

53707/7882