

Similarly, AAA supports AASHTO comments, which correctly note at page 6 that the application of the proposed power limitation "is a potentially devastating recommendation". AASHTO comments also properly note at page 7 that these restrictions would require wide area systems to purchase and develop four to six times as many transmitter sites simply to cover the same area of operation. This can become prohibitively expensive, particularly for nonprofit, membership supported organizations such as AAA. AAA supports APCO comments at pages 29-30 noting that proposed power limitations would result in tremendous expense, and may potentially preclude effective system coverage. APCO also correctly notes at page 30 that proposed power limitations would increase the need for spectrum (thereby contradicting the goals of refarming) since microwave or other control frequencies would be needed to connect the new sites.

Similarly, AAA concurs with comments at page 4 of Bell Atlantic opposing power limits, since the proposed restrictions do not recognize diversity of private radio users, and because proposed restrictions would result in substantially reduced coverage areas for some systems. Licensees would need to expend great sums to construct fill-in transmitters and to rebuild coverage areas. In particular, AAA concurs with Bell Atlantic's urging of total abandonment of power limits. AAA concurs that such restrictions are entirely inappropriate.

AAA also concurs with Coalition comments at page 16 opposing the Commission's proposed power limitations, as well as the comments of E.F. Johnson at page 20, and LMCC which likewise oppose these limitations. As a member of LMCC, the AAA supports the LMCC proposed "safe harbor" table as a second-best option. AAA's first-best option is complete elimination of proposed power restrictions. To the extent that the record reflects nearly unanimous opposition to power restrictions, those restrictions should be dropped.

AAA likewise concurs with APCO comments at page 30 urging a public safety exception to proposed power restrictions. Unlike the small California town cited by the Commission as transmitting well beyond jurisdictional limits, and unlike many PLMRS licensees with established delivery or service routes, the AAA auto clubs do not know where an emergency response next will be required. AAA auto clubs dispatch to wherever there are automobiles. Thus, as part of its public safety function, AAA service areas should be expanded, not constricted.

AAA also concurs with comments of MCI at page 3 opposing maximum ERP limits because they do not take into account necessary coverage areas, frequency congestion, shape of the coverage area, or the extraordinary number of additional stations that must be constructed to meet these new onerous limits. In particular, AAA concurs with the MCI opposition to the January 1, 1996 deadline for meeting the new ERP

limits. AAA believes that all such ERP restrictions should be abandoned. However, if some form of power limits are imposed, a more reasonable implementation schedule also should be mandated, to allow for planning, budgetary and equipment amortization considerations.

AAA concurs with numerous comments opposing the proposed reduction of power because such onerous limitations have not been explained or justified by the Commission. As AAA noted in its initial comments, anecdotal evidence of a single small town in California using an apparently overpowered system does not constitute a basis for a finding of widespread abuse of power limits. Moreover, no refarming objective would be furthered by these proposed power restrictions. Exclusivity and frequency reuse over a geographic area would not be promoted by these power restrictions. PLMRS licensees with existing service areas would feel compelled to continue serving those service areas, not to cut back on coverage.

Likewise, AAA concurs with TIA comments at page 18 opposing proposed ERP/HAAT limits, because they "do not adequately address the issues of operational requirements, system costs or spectrum efficiency." As TIA correctly points out, these proposed onerous power restrictions would result in additional transmitter sites with greater coverage, actually reducing spectrum re-use. Furthermore, the multiple site networking may necessitate use of microwave spectrum, in contravention of the Commission's goals to transition

microwave bands to other uses. Existing PLMRS licensees would go to great expense to purchase new transmitters and lease new sites just to fill in existing coverage. The FCC cannot mandate by fiat that existing PLMRS licensees should transmit over smaller delivery routes, political jurisdictions or other business service areas, simply to superimpose a grid model of what the FCC presumes to be optimum power usage. Rather, the power must be sufficient to cover existing business service areas. Very little spectrum would be freed up by these power restrictions. Indeed, the record shows that proposed restrictions would result in direct loss of spectrum.

AAA concurs with UTC comments at page 40 opposing proposed uniform power/height limits because they are arbitrary, unrealistic, not proven to produce a net gain of available spectrum, likely to result in significant cutbacks in coverage, and inconsistent with the primary purpose of the refarming docket.

The AAA notes that given (1) nearly uniform opposition to power limits; (2) the absence of adequate explanation for these proposals; (3) the absence on the record of credible evidence that most systems are overpowered; (4) existing Commission rules prohibiting overpowered systems; and (5) that implementation of proposed power limits would contradict refarming goals, such requirements may be construed as arbitrary and capricious. AAA respectfully urges in the

strongest way that proposed power limits must be abandoned entirely.

V. THE RECORD SUPPORTS LMCC'S PROPOSAL TO MIGRATE TO 12.5 KHZ BANDWIDTH

In contrast to the absence of fulfillment of any refarming objectives by power limits, channel splitting certainly furthers the Commission's stated goal of increasing spectrum efficiency. However, significant concerns have been raised on the record regarding forced conversion to narrowband (6.25 KHz) by PLMRS licensees who are not in a position to do so. Thus, AAA wholeheartedly supports LMCC's proposed migration plan for the UHF band. The LMCC proposal would ensure relatively orderly and graceful migration, with less of a disruption in equipment manufacturing plans and capital spending budgets than would the Commission's initial proposals. In particular, AAA concurs with the LMCC proposal that the Commission initiate follow up rulemaking by January

CONCLUSION

Exclusive auto club use of its frequencies should be continued. AAA frequencies should be placed in (1) the current Automobile Emergency Radio Service, or (2) the Public Safety Radio Service, or (3) a newly created business safety

In light of the foregoing, it is respectfully submitted that the Commission adopt the foregoing recommendations.

Respectfully submitted,

**The American Automobile
Association**

By: Norman C. Halpern

Title: Sr. V.P., Corporate Management

Counsel:

John A. Prendergast, Esq.
Julian P. Gehman, Esq.
Blooston, Mordkofsky, Jackson
& Dickens, of counsel
2120 L Street, NW
Washington, D.C. 20037
(202) 659-0830

Filed: July 30, 1993

EXHIBIT 1



Automobile Club of Southern California

P. O. BOX 2890 • LOS ANGELES, CALIFORNIA 90031-0890

EMERGENCY ROAD SERVICES
DEAN HOLTE, DIVISION MANAGER
RECEIVING AND DISPATCHING OPERATIONS
(213) 741-8217

July 9, 1993

Mr. Paul Kindschy
Director, National Road Services
American Automobile Association
1000 AAA Drive
Heathrow, Florida 32746-5063

Dear Paul:

We are responding to your request for information regarding the refarming/public safety issues.

Enclosed you will find a number of ACSC internal documents highlighting public safety as an issue. Also, enclosed is a two-page excerpt from ACSC's "Ten-Five" publication issued quarterly to our contractors. They contain complimentary letters from our members.

In addition, I would like to point out the following:

1. ACSC renders service to an average of 12,000 calls per month on freeways or restricted access highways. This represents approximately 4.5% of our dispatched volume. These calls come to us through the freeway callbox system, as relays from officers at the scene, and from members calling from nearby pay phones or from cellular phones.
2. ACSC averages 2,000 service requests per month that are classified as "HOT" calls. These are calls where members are fearful for their safety, and ACSC and the contractor network respond by "dropping everything else" to expedite service to the member. We have received hundreds of compliments from members indicating their appreciation for our Club's concern for safety. Many members are aware that police departments do not have the resources to dispatch a police car

Page Two

It is interesting to note the largest majority of our "HOT" calls are "baby-locked-in-car," and when it comes to getting the children out, members call us, not 911 for rescue. These members clearly place us in the "public safety" business.

3. With the number of tow truck drivers out' on the road, they often are among the first to come upon the scene of an accident. Not only do they contact us by radio to relay a "10-33" to the police departments, but also will stay at the scene directing traffic or assisting in any way possible until the police arrive.

Please contact me if I can be of further assistance.

Best regards,



Dean Holte

DH:ssh
Enc.
pc: Sharon Supple
s:\kindsy

Compliment Mailbag . . .

One dark, cold night, I cleverly ran my car over an embankment in the Five Points Shopping Center parking lot. I called AAA and Joe Green from BJ's

I have never really felt compelled to write a letter to anyone about their service, until now. I would like to express my appreciation for Jim Lienhardt of B & B Tow-

I wanted to let you know that I appreciated the prompt and courteous service I received from Charlie Imber of Roy's Towing, Thousand Oaks. I was back on the road in 20 mins. This is one of

I had broken down on Highway 111 with a blown tire. I called the Auto Club and Jose Zepeda of Sawyer's Garage in El Centro was there in ten minutes. I was very thankful for this fast arrival since it was an unseasonably hot 114 degrees. He assisted me in getting into the cab of his truck and he left the air conditioning on so I could sit in comfort while he changed my tire. It would not be possible for an individual to be treated nicer than how Jose treated me on that hot day on the freeway.

I was very pleased with the service I received from Craig Temple of Caldwell's Auto Body & Towing, Santa Ana. The young man did a skillful job of towing the vehicle out of a tight spot and also was very courteous and pleasant.

The other night, enroute to a National University Ph.D. Management program, my wife experienced automobile problems. I was delighted to hear the lengthy and detailed compliments about the well-kept tow truck and the impeccable, courteous driver. He also drove her two blocks so she would have a safe, comfortable waiting area. As a retired Captain of the United States Navy, I have made a career of deciphering average and above-average. Greg Perry of B & B Towing in San Diego is absolutely impressive. This is the first letter of this nature I have ever written. A paradigm of the 90's is satisfactory customer service. Greg Perry is doing it right!

Recently, I ran out of gas on the freeway. Armando Beltran of South L.A. Tow started my car and then offered to follow me to a gasoline station nearby to fill up my tank when I expressed concern about my location. After filling up my car, I offered Armando a tip, which he refused, saying this was a part of his job. With all the crime in L.A., I was extremely nervous about my personal safety. I greatly appreciated the prompt service from Armando, his helpful attitude and concern for my safety. I have told many people about the outstanding service I received.

While on our way to a matinee performance at the Ahmanson Theater, my mother and I became stranded when my car broke down. Joe Carrera of Sid's Tow Service, Inc., Los Angeles, responded to my call. Mr. Carrera went out of his way to patiently explain our options. We ultimately decided to have the car towed to Sid's facility for overnight storage and transport to the garage the next morning. When we expressed concern about getting to the theater, Joe was kind enough to drive us there. We were somewhat embarrassed to discover when we got there that we had been less than two blocks away, but Mr. Carrera was too much a gentleman to suggest that we walk. Joe Carrera is a credit to your company.

The other morning I experienced a left rear blow-out while driving 70 mph on the freeway. I managed to make it to the right shoulder near a callbox. I called the Auto Club and in practically no time at all, John Wallace of Hisham's Towing in Gardena was standing in front of me. He was courteous, professional and very concerned for my safety. It was a pleasure to be helped in the midst of a nasty scene by a man like John. I commend him.

My daughter locked her keys and my two grandsons in her car. In a panic, I called the Auto Club and then went to reassure my daughter. By the time I reached them, Mike Stout of Mandic Motors, Inc. of Huntington Beach was already there and had the doors open. Then, to reassure my two-year-old grandson, Mike showed him his truck lights. Now all we hear is "tow truck" from my grandson. Thanks for responding so quickly to a stressful situation.

Majid Pazavi of Airport Union Towing in Los Angeles arrived promptly and was very pleasant to do business with. He was courteous, efficient and made an otherwise unpleasant experience not so bad.

I just wanted to say a big THANK YOU to Elias Hajar who helped me when I had car trouble in West Los Angeles. He was just great! He checked everything out very carefully and managed to fix it so we could drive home that same night. If everyone at Westwood Club Service is as great as Elias, the Club must be proud to have them as a service provider. I feel proud to be a member of such a wonderful organization. Keep up the good work.

I had to call the AAA because my car had a dead battery. In under fifteen minutes, Rick Brock from American Desert Towing in Palm Desert arrived at my front door. It was a pleasure to see a likeable young man providing service with a friendly smile on his face. He should be given a lot of credit.

I had to call the Auto Club for service and they sent out Tyco Heald of DJ's Auto Body in Hemet. He was very polite and helpful. After getting the car started he offered to follow me to my place of business to ensure I got there safely. The car did not stall, thank goodness, but if it had, Tyco was behind me the entire time. It was wonderful to meet such a fine young man.

Mark Henley from Piro's Automotive, Inc. in Hemet is the greatest! He brought my gasoline, put it in the gas tank and made sure the car started. This doesn't sound like much, but he was so polite and caring. Keep this one!



ACTIVITY REPORT

20 March 1991

by
James Hoke
Service Patrol

To: Rod Centeno
Terry Abajuela

On the evening of March 20th at about 7:15 pm I received a phone call at home from Steve File, ERS R&D Manager. Mr. File related the problems that were occurring on I-8 east of Alpine, and asked if I would be willing to help due to the heavy snow activity in the mountains. There were numerous traffic collisions, disabled vehicles, and vehicles stuck in the snow. CHP was already overwhelmed with accidents and other problems, and the ICS that covers that area only had one truck with chains capable of operating that night.

I was glad to respond, and after getting approval from my superior, I gathered together items I might need (snow/rain gear, blankets, jackets, medical kit, and some extra road flares) and arrived on scene at approximately 9:00 pm. I proceeded working the area on I-8 from East Willows Road to Suckman Springs, a distance of 15 miles, from the time I arrived on scene until 1:00 am.

The fast pace at which things were happening hindered me from keeping a more accurate time log, and getting plate numbers did not seem practical for safety reasons due to the inclement weather and poor visibility. That night more than a foot of snow fell, causing the poor visibility, and the snow plows seemed few & far between allowing for a lot of snow accumulation. CHP and Caltrans were both made aware of my presence in the area, and were glad to see the Auto Club there to help.

Attached is the order of events as they occurred.

1. Caltrans asked me to look for a woman who was alone in her car ,stuck in a ditch. I found the vehiol they described, but the CHP had already picked her up.
2. I then helped two women that were stuck at the view point in a white Ford truck.
3. I then checked every vehical along side the road, to be sure that they were empty. A total of 7 cars damaged or stuck in the snow.
4. After that I escorted a CHP officer to Buckman Springs, he had the missing woman motorist.
5. Turning west from Buckman Springs and heading up the grade towards Pine Valley, a two lane stretch of freeway, I found the road blocked by a Mazda Miata. I towed the woman driver up the hill, and then escorted her to a motel, pulling her out of the snow two more times on the way,
6. On my way out of Pine Valley, I found a flat bed pick up stuck on the side of the road with two occupants and I hooked up and towed them to freshly plowed I-8.
7. I returned to Buckman Springs and headed west up the grade towards Pine Valley and found three semi-trucks abreast, blocking the road completley. The one on the left was empty so I hooked my chain on and pulled him up the road to the right shoulder, out of traffic, once again clearing the way for the backed-up cars and trucks to continue on their way.
8. In all I pulled four semi-trucks up the grade, west of Buckman Springs, three of them to the top of the hill. Each time it reopened the traffic lanes. On the last I towed, I had to free him from the snow a total of four times.

While I was towing the big trucks I did realize that there was potential for damaging my Club vehical, although with the amount of snow that was on the road at the time and with the weight behind me, my tires were spinning in the snow not on the pavement, I felt that the chances of damage were small.

In all I made six trips up and down the grade between Pine Valley and Buckman Springs. After I unhooked from the last truck, W/B I-8 W/O Pine Valley creek, I drove to Willows rd. turned east and made one more pass from there to Buckman and back. Finding nobody in need of help, I checked one last time with San Diego dispatch before heading home. The time was 1:00am, with a one hour drive home ahead of me. I spent a total of four hours on scene.

Doris S. See
12559 Catalpa Pl.
Chino, CA 91710

RECEIVED

JUL 17 1992

CSA Chino

To Whom It May Concern:

I am writing in response to a situation that happened to me this weekend.

My two daughters and I were returning from San Diego Sunday evening 7/12/92. At approximately 8:00 PM I lost all power in my van while traveling north on I-15 through Lake Elsinor area. Luckily my sister and her children were in another car and saw we were having trouble and pulled off the road to assist me. We all loaded into her car and drove to a phone to call AAA.

I explained to the operator on duty I was a single parent with small children and my car was stranded in a very secluded area off the freeway with limited lighting and to please hurry.

Once we returned to my van it was only a matter of minutes

~~Dworsky Associates~~
Architecture and Planning
3530 Wilshire Boulevard, Suite 1000
Los Angeles, California 90010-2300
213-380-9100
213-380-7250-FAX

Dworsky

April 12, 1993

"K"
1324
Amanda
Cultrani

Ms. Debi Colwell
American Automobile Association
Los Angeles Office
2801 S. Figueroa Street
Los Angeles, California 90007

Re: Kilo, South L.A. Tow
6219 S. Vermont Avenue 90044

Dear Ms. Colwell:

Last Friday, I ran out of gas on the Harbor Freeway in South Central Los Angeles (The Vernon Exit on South Bound Harbor Freeway). The service I received from the Southern California Automobile Club was outstanding!

Kilo of L.A. Tow Company was at my car in 15 minutes. Kilo started my car and then offered to follow me to a gasoline station nearby to fill up my tank when I expressed concerns about the dangerous location. After filling up my car, I offered Kilo a tip, which he refused, saying this was a part of his job.

With all of the crime in Los Angeles, I was extremely nervous about my personal safety during this entire incident. I greatly appreciated the prompt service from Kilo, his helpful attitude and concern for my safety. If there are awards given to your service providers, I believe that Kilo should be given the highest honor. He not only provided the basic services in the AAA agreement, but he went beyond the call of duty by his very professional and caring attitude.

I greatly appreciated your services last Friday and have told many people about the outstanding service I received from Kilo and your company.

Sincerely,


Sara J. Smith (Sally)
#70285890-0090

cc: Kilo, South L.A. Tow

Ⓢ

Daniel L. Dworsky FAIA, Nathaniel M. Abrahms AIA, Doug Dworsky AIA, Robert A. Levine AIA, Robert L. Newcom AIA, Robert Rosenberg AIA, Gregory C. Sarao AIA, R. Michael Walden AIA, Architects Laurie Salmore

516 S. Indiana St.
Anaheim, Ca 92805
Sept. 14, 1992

Dear Sirs:

We have been members of AAA for 24 years and Friday, Sept. 11 was the first time we have called for assistance.

Our car stalled on Carson Blvd. in Hawaiian Gardens causing a problem in the morning traffic. AAA was called and help arrived in less than ten minutes. As my husband is very ill and cannot walk without assistance, the driver, Tony Quenga, helped him to the tow vehicle, boosted him in and after I was seated hooked up our car.

We were on our way for my husband's chemotherapy at Charter Hospital less than one mile away and Tony drove us right to our destination.

Answer

November 18, 1992

November 13, 1992

TO: Dale A. Edrich, Field Manager
Contract Station Relations
Orange County

RE: 724 Leisure World Union
Driver Recommendation

I would like to commend the following drivers from ICS 724: Scott Herrick, Darren Ellis, and Jason Landon who stopped and jacked a car off two seriously injured pedestrians that had been run over while waiting at a bustop at Seal Beach Boulevard and St. Cloud Street in Seal Beach on 11-12-92.

According to the drivers, they just happened to be passing by when they saw a big cloud of smoke. Jason immediately ordered a 10-33 while Scott ran to the car and saw a female pedestrian with the passenger front tire buried in her chest. Scott ran to the truck and got a floor jack and began jacking up the passenger side of the car. Jason and Darren got a second jack and began jacking up the other side of the vehicle as well as blocking it off, while Scott tried to console the injured pedestrians.

Upon arrival of the paramedics, Scott, Jason, and Darren assisted them in extricating two pedestrians for helicopter life-flight to the hospital.

I would like to recommend that we show our appreciation to these three drivers for their response and heroic actions which exemplifies the image that the Club values and strives to display.



Dan Bolten, Supervisor
Contract Station Relations
Orange County

DB:es

01\0000\780007

July 25, 1992

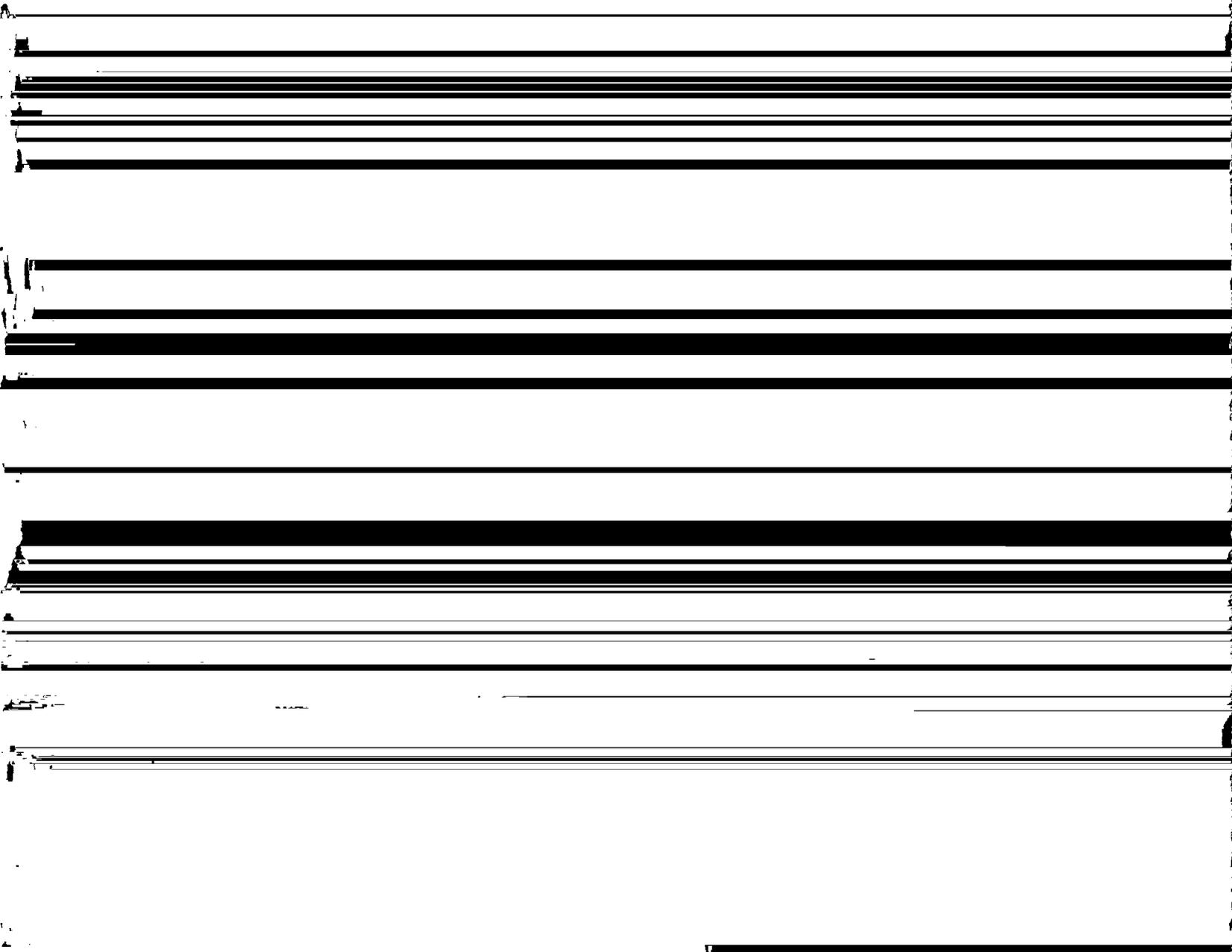
Automobile Club of Southern California
P.O. Box 2690
Los Angeles, CA 90051

RECEIVED
AUG 13 1992
ERS REGION IV
RECEIVED
AUG 11 1992

CONTACT STATION RELATIONS

Gentlemen:

I want you to know how pleased I am with the service I've received as a member of the Auto Club. Too often consumers are quick to criticize and

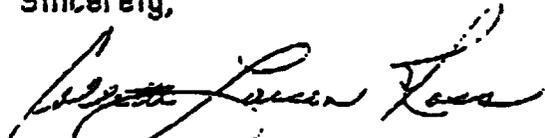


informed me he already had someone on the way. Lexi, who was standing right next to me, was beginning to struggle with her breathing. It's difficult for me to express how desperate I felt.

I had only been on the phone with the Auto Club for perhaps three to five minutes when a tow truck pulled up. The driver jumped out of the truck and by the time I could thank the dispatcher I was talking to and get to my car, my door was open and Lexi was back on her oxygen. The Shell station attendant, my daughters, and I were all absolutely amazed at how quickly we'd gotten help. I'm certain it would have taken longer to get an ambulance to us. I can't adequately express how much I appreciate the incredible service I received. I wish now I'd gotten the names of the dispatcher, the station attendant, and the truck driver so I could thank all of them personally. The entire ordeal reconfirms my belief that there are ordinary people out there who, when a need is there, prove themselves to be extraordinary.

Please consider me a very satisfied member of the Automobile Club of Southern California. Thank you for your fine service and for employing such caring, competent people.

Sincerely,


Collette Larsen Ross

RECEIVED
AUG 13 1992
ERS REGION IV

EXHIBIT 2

PRIORITY CALLS

Depending upon the priority number (0-5), the calltaker will normally notify the supervisor as soon as a priority situation has been discovered. The supervisor will notify the dispatcher and ask for an estimated wait time to tell the member.

Use the following procedures when handling priority calls:

CHOICE 1

Dispatcher should notify the nearest available truck to the caller's location. If the call is a PRIORITY #0, 1 OR 2, notify the driver immediately that this is a priority call; Give the location, type of service, type of situation (baby locked in car, etc.) and ask for an estimated wait time. Notify the supervisor of the estimated wait time as soon as it is relayed to you by the driver. Advise the driver that it is imperative he communicate enroute and at X2 time on #0 - 2 Priority calls.

If the call is marked PRIORITY 3. it is a SPECIAL CALL and should

CHOICE II - (USE FOR PRIORITY #0, #1 AND #2 ONLY)

If the station nearest the location is unable to run the priority call within our time frame (10-15 minutes max.), announce over the radio "We have a priority call", and give the location and ask "Can any ACMO X2 at this location within 10 minutes?" Give the call to whomever is nearest and willing.

Keep the supervisor informed of the status of the call and notify him/her upon X-2 and X-3 of the priority call. All priority calls must be (1) documented on the Daily Dispatch Log and (2) a printout of the call displaying the X2 time must be pulled and 2 copies should be made and marked attention "Field Operations - Priority Call" and Attention "Comm. Center Mgr. - Priority Call". A copy should also be printed displaying the X3 time. The supervisor will retain this copy.

SCOPE OF SERVICE

PRIORITY #0, 1 AND 2 calls will be made to non-members as well as

*John: June '93
61 priority 0-1*

EDOSP ACTIVE CALLS: 6 AGED: 1 UNDISPATCHED: 0 06/27/93
EDOSM ===== 14:55
ALL NUMBER: 270129 ~~PR-378-378-378~~ STATUS: ACTIVE
ARRANGE M TINGLE 0292668317 (913)451-6007 RES
4 11418 FLOYD DRIVE 11576H OVP -
LOCATION: LOT 56
SUB -
SOLLEM: KEYS S08
CAR OF CAR: 98 COLOR: RED MAKE: PONT MODEL: GRAND AM
IN DEST: BABY LOCKED IN CAR AND MOTOR RUNNING//LOCKOUT
INCIDENTS:

=====

SUPERVISORS NOTE:
ET/ELAPSE: 30 / 00:07 1442 NC 00000/ 018 KNIP:
ALL TIME : 14:41 / 06/27/93 1442 MG 00000/ S08 KNIP:
LAT/TIME : 02 / 14:48 1442 DQ 71724/ S08 RNDL:
ART/GARZ : 71724 / 71418 1443 DD 71724/ S08 RNDL:
PHONE : (913)881-7103 RES 1448 02 71724/ S08 RNDL:
DSP TIME : 14:43
-ID S08 STA 00000 SEL

DISPATCH NOTE:
ALL = STATUS STA TRK NEW U-ID
-RWD 2-BWD 3-DSP 4-SHW 5-ASG 6-GRD 7-AGE10 8-AGE0 9-STAT 10-WIN 11-PRE 12-EXT

GARAGE NUMBER: 71724 DATE: 6/28/93
GARAGE NAME: Overhead Park South DEDUCT: \$ _____
GARAGE CITY: _____ CREDIT: \$ 25.00

_____ DAMAGE	_____ EQUIPMENT
_____ OVERCHARGE	_____ IMPROPER REPAIRS
_____ C.O.D.	_____ RADIO MAINTENANCE
_____ MILEAGE	_____ MISCELLANEOUS

* Primita LMD # 200120