

# First Annual Report on EPA Actions Implementing the Pesticide Registration Improvement Act - Fiscal Year 2004

The Consolidated Appropriations Act of 2004, signed by President Bush on January 23, 2004, established a new section 33 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), which creates a registration service fee system for applications for specified pesticide registration, amended registration, and associated tolerance actions. Under this new system, fees are charged for covered applications received on or after March 23, 2004, and for certain pending applications received before that date. EPA is required to make a determination on the application within the decision times specified. The fee system is authorized until September 30, 2010, although the decision times under the system do not apply to applications received after September 30, 2008. This new system is known as the Pesticide Registration Improvement Act of 2003 (PRIA).

Under section 33(k) of PRIA, the Agency is required to publish an annual report describing actions taken under this section during the past fiscal year. Specifically, the Agency is directed to include several elements in the report, including a review of the progress made in carrying out its obligations under the Act, a description of the staffing and resources related to the costs associated with the review and decision-making pertaining to applications, and a review of its progress in meeting the reregistration and tolerance reassessment timeline requirements. This first annual report will cover the time period from January 23, 2004, through September 30, 2004.

## Early Implementation Efforts

The President's approval of the Consolidated Appropriations Act of 2004 triggered a 60-day implementation period for EPA prior to the effective date of PRIA (March 23, 2004). During this 60-day period, the Agency undertook a number of steps to implement PRIA. Those steps are described in this section of the annual report. The Agency's first step was to create a number of intra-Agency workgroups to develop recommendations for certain aspects of the new registration systems. Committees established included: front-end processing and screening procedures; waivers and refunds; funds management; and communications.

### **Front-End Processing and Screening Procedures**

To facilitate the implementation of PRIA, the Agency established new front-end screening procedures for new pesticide applications. Interpretations of the 90 PRIA registration categories were developed by an intra-agency workgroup composed of staff from the Office of Pesticide Programs and the Office of General Counsel. Preliminary interpretations were published on the Agency's website on March 22, 2004. As the Agency gains experience with the application of these interpretations to incoming registration requests, the Agency intends to publish updates on its website (<http://www.epa.gov/pesticides/fees/categories/index.htm>). Expert teams from the three registering divisions (Antimicrobials Division, Biopesticides and Pollution Prevention Division, and Registration Division) have been established to screen all incoming applications, to determine if the request is subject to PRIA, and to assign the application to a PRIA category (if appropriate). Typically within 48-72 hours from receipt of the application, the registrant is sent an invoice requesting payment of the appropriate PRIA registration service fee. The Agency's internal tracking system, known as the Office of Pesticide Programs Information Network (OPPIN), was re-tooled to track all PRIA applications to ensure compliance with the PRIA decision time review periods. The Agency also enhanced OPPIN to mail invoices electronically to applicants.

In addition, the Agency revised its procedures for the initial screening of all data submitted to the Agency by registrants. With the new PRIA resources, the Agency enhanced its existing data management contract to reduce the study processing time to 10 days. This step now ensures that complete data packages are ready to enter the review process at the beginning of the specified decision time review period if the

applicant has correctly formatted the data submission.

## **Funds Management/Funds Utilization**

Section 33(c) of PRIA established the Pesticide Registration Fund. Congress established this fund in the Treasury of the United States to carry out the provisions of PRIA. All registration service fees received by the Agency are deposited in this fund. Expenditures from the fund can be made to cover the costs associated with the review and decision-making pertaining to all applications for which registration service fees have been paid. To facilitate the creation of this Fund, the Agency worked with the Mellon Bank to establish the fund, create billing procedures, and coordinate communications on fee receipts between the Bank and the Agency. This latter piece was particularly critical as the fee payment receipt triggers the start of decision time review period.

## **Waivers and Fee Reductions**

The Consolidated Appropriations Act of 2004, signed by President Bush on January 23, 2004, established a new section 33 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), which creates a registration service fee system for applications for specified pesticide registration, amended registration, and associated tolerance actions. Under this new system, fees are charged for covered applications received on or after March 23, 2004, and for certain pending applications received before that date. EPA is required to make a determination on the application within the decision times specified. The fee system is authorized until September 30, 2010, although the decision times under the system do not apply to applications received after September 30, 2008. This new system is known as the Pesticide Registration Improvement Act of 2003 (PRIA).

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## **Communications and Outreach**

On March 11, 2004, the Agency held a workshop to educate affected stakeholders and the public on PRIA implementation and impacts. This workshop was attended by nearly 500 people. Topics ranged from an overview of the new statute, revised application submission procedures, guidance on the review of waivers, and the Agency's initial considerations for how to allocate resources from the Pesticide Registration Fund to the worker protection program and the inert ingredients review program. The Agency's presentations can be found on the EPA website at: <http://www.epa.gov/pesticides/fees/index.htm>.

As required by the statute, on March 17, 2004, the Agency published the schedule of covered applications and registration service fees. In addition, since the statute suspended the Agency's authority to collect tolerance petition fees, the Agency issued a final rule on March 17, 2004, suspending the tolerance petition fee collection regulations.

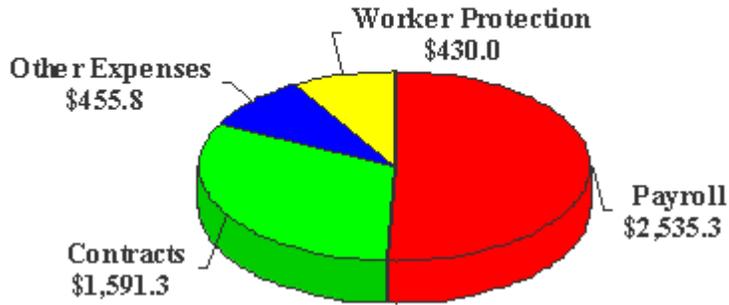
The Agency also established a website dedicated solely to PRIA implementation. The site is <http://www.epa.gov/pesticides/fees>. Through this website, the public can submit questions regarding PRIA implementation. Questions are typically answered within 24 hours.

## **Financial Overview**

During fiscal year 2004, the Agency received \$14.7 million in new registration service fees. From these new fees, the Agency spent approximately \$5 million, carrying the remaining balance of \$9.7 million

forward to fiscal year 2005. The chart below summarizes the Agency's FY2004 expenditures from the Pesticide Registration Fund (figures presented are in thousands):

## FY2004 PRIA Expenditures



The majority of the expenditures from the Pesticide Registration Fund were spent on payroll costs and to expand data review output through contracts. The Agency also invested heavily in upgrading its information management system (the Office of Pesticide Programs Information Network) to be able to track compliance with the PRIA decision time review periods.

### Waivers of Registration Service Fees

In response to requests for fee waivers and fee reductions, as authorized by PRIA, the Agency waived \$1.5 million in registration service fees. The Agency reviewed over 200 waiver requests, granting over 85 percent of the waivers requested. Agency decisions to grant waivers were reviewed, on average, in 52 days. Agency decisions to deny waiver requests were reviewed, on average, in 67 days, slightly above the PRIA standard of 60 days. Since the end of fiscal year 2004, the Agency has revised its internal procedures to ensure that waiver decisions are always made within the 60-day statutory review period.

## Progress in Meeting Decision Times

Number of PRIA Actions Completed in FY2004.

The Agency completed 208 decisions subject to PRIA during the fiscal year. All decisions were made within the statutorily-mandated decision review times. The chart below summarizes the number of decisions completed by PRIA category.

### Progress in Meeting Decision Times area

PRIA Category	Number of PRIA Applications Completed in FY2004
R1	2
R2	4

<b>R7</b>	1
<b>R17</b>	1
<b>R18</b>	1
<b>R20</b>	1
<b>R24</b>	2
<b>R26</b>	1
<b>R30</b>	72
<b>R31</b>	62
<b>R32</b>	1
<b>R33</b>	3
<b>R34</b>	29
<b>R35</b>	4
<b>A53</b>	7
<b>A54</b>	2
<b>A57</b>	5
<b>B59</b>	3
<b>B60</b>	1
<b>B66</b>	3
<b>B67</b>	1
<b>B68</b>	1
<b>B69</b>	1
<b>TOTAL</b>	208

Appendix A contains a list of all applications subject to PRIA reviewed during FY2004 and includes the decision times for each application. Number of PRIA Applications Pending at the End of FY2004.

The following table summarizes the number of pending registration applications in each of the PRIA categories. As of September 30, 2004, 1,081 applications subject to PRIA were pending in the Agency's registration queue.

<b>PRIA Category</b>	<b>Number of PRIA Applications Pending at the End of FY2004</b>
<b>R1</b>	31
<b>R2</b>	13
<b>R5</b>	1
<b>R6</b>	7
<b>R9</b>	1
<b>R11</b>	2

<b>R14</b>	3
<b>R15</b>	2
<b>R17</b>	81
<b>R18</b>	51
<b>R19</b>	18
<b>R20</b>	17
<b>R23</b>	30
<b>R24</b>	2
<b>R26</b>	9
<b>R28</b>	9
<b>R29</b>	6
<b>R30</b>	81
<b>R31</b>	243
<b>R32</b>	13
<b>R33</b>	32
<b>R34</b>	110
<b>R35</b>	49
<b>R36</b>	2
<b>R37</b>	4
<b>A38</b>	1
<b>A41</b>	12
<b>A42</b>	15
<b>A48</b>	2
<b>A49</b>	5
<b>A50</b>	3
<b>A51</b>	1
<b>A52</b>	1
<b>A53</b>	23
<b>A54</b>	32
<b>A55</b>	5
<b>A56</b>	4
<b>A57</b>	36
<b>B59</b>	15
<b>B60</b>	20
<b>B63</b>	5
<b>B65</b>	1

<b>B66</b>	1
<b>B67</b>	48
<b>B68</b>	8
<b>B69</b>	1
<b>B70</b>	1
<b>B71</b>	4
<b>B72</b>	3
<b>B73</b>	1
<b>B75</b>	2
<b>B80</b>	2
<b>B81</b>	4
<b>B84</b>	1
<b>B86</b>	2
<b>B88</b>	5

#### **Pending Inert Ingredients at the End of FY2004**

PRIA section 33(k)(2)(A)(ii) also requires the Agency to provide the number of inert ingredients pending review by the Agency. As of September 30, 2004, the Agency had 44 petitions for new inert ingredients (37 received prior to the PRIA effective date and 7 received subsequently)

## **Process Improvements in the Registration Program**

Section 33(e) of PRIA directs the Agency to identify and evaluate reforms to the pesticide registration process, with the goal of reducing decision reviews times for pesticide registration applications. The Agency has made considerable progress during the fiscal year in improving its operations. It has undertaken a number of steps, both internal and external, to explore, develop, and implement improvements in the registration process.

In identifying process improvements, the Agency will not compromise the scientific quality of its assessments as a means towards reducing decision time review periods. The Agency believes that, in terms of receiving recommendations for process improvements, the best means of gathering together suggested improvement areas was through the Federal Advisory Committee Act (FACA) process.

#### **Formation of a Process Improvement Workgroup**

A major effort during FY2004 was the creation of a new workgroup under the auspices of the Pesticide Program Dialogue Committee to evaluate process improvements in the registration program. This Process Improvement Workgroup is composed of members of individual registrant companies, pesticide trade associations, public interest groups, and Agency staff. Meetings are open to the public and are held approximately every 3-4 months. The first meeting of the Process Improvement Workgroup was held in August 2004. Reports from these meetings can be found on the Agency's website at: <http://www.epa.gov/oppfead1/cb/ppdc/pria/index.html>.

Industry stakeholders identified many areas for improvement in the registration process, ranging from in-processing of applications, how applications should be reviewed, and the involvement of the registrants in the decision-making process. Many of the process improvements proposed by the Agency complemented

these issues. The Agency continues to work with all stakeholders to evaluate these and other potential improvements to the registration process.

### **Process Improvements Implemented within the Registration Program**

A key process improvement has been improved coordination between EPA and the IR-4 Program. Historically, the registration application to add a new IR-4 supported use to a label has not been submitted simultaneously with the IR-4 tolerance petition. Often times, the label request has arrived several months to years after the IR-4 tolerance petition has been submitted to the Agency. This delay in the label submission ultimately affects the Agency's ability to act on the tolerance petition submitted by IR-4 in a timely manner. The IR-4 program volunteered to perform a new coordination function in which they will submit the registration request on behalf of the registrant simultaneously with the IR-4 tolerance petition. This coordinated submission will ensure the timely start of the decision time review period under PRIA and will give minor use growers greater predictability of when to anticipate a registration decision.

### **Scoping Meetings**

Scoping is the process of examining and often re-examining the specific action to determine what specific work is required to complete the action. Another aspect of scoping is determining how this work can be completed in the most efficient manner possible and defining a schedule for the action based on this determination. The Agency has begun to use existing alternative processes – the low toxicity screening group and the Alternative Risk Integration and Assessment (ARIA) Team –to think of new and innovative ways to review registration requests more efficiently. The Agency's scientific organizations have also begun scoping exercises, such as problem formulation and risk tiering, to evaluate new registration submissions.

### **[bppdconsistency@epa.gov](mailto:bppdconsistency@epa.gov)**

The Biopesticides and Pollution Prevention Division (BPPD) created a service, known as [bppdconsistency@epa.gov](mailto:bppdconsistency@epa.gov), to respond to issues concerning Biopesticide registration inconsistency that affect processing of submissions. The Division's biopesticide Regulatory Action Leaders (RALs) meet on a regular basis to discuss issues raised through this service and provide an answer usually within two to three weeks. BPPD posts the resolution of issues at: <http://www.epa.gov/pesticides/biopesticides/>.

## **Progress in Meeting Tolerance Reassessment and Food Use Reregistration Timelines**

### **FY2004 Accomplishments**

During Fiscal Year 2004, the Agency made significant progress in completing risk assessments and risk management decisions for pesticide reregistration. The Agency completed 17 Reregistration Eligibility Decisions (REDs). During Fiscal Year 2004, the Agency issued tolerance reassessment eligibility decisions (TREDs) for 18 active ingredients and 8 pesticide inert ingredients. These decisions resulted in the completion of 467 tolerance reassessments

### **Status of Reregistration**

Through the end of FY2004, the Agency has completed 244 REDs and must issue 137 more REDs to complete reregistration by the end of FY2008. EPA's goal is to complete 30-40 reregistration eligibility decisions each year during fiscal years 2005 and 2006 for pesticides with associated tolerances, and to complete a total of 40 REDs in FY2007 and FY2008 for pesticides with no food uses or tolerances. This will satisfy PRIA requirements and support the Agency's tolerance reassessment and reregistration goals. EPA's schedule for completing these decisions can be found on the Agency's website at: <http://www.epa.gov/pesticides/reregistration/product-rereg-schedule.htm>.

## **Status of Tolerance Reassessment**

Through the end of FY2004, the Agency has completed a total of 7,092 tolerance reassessment decisions to date, addressing 73% of the 9,721 tolerances that require reassessment. EPA is accomplishing tolerance reassessment through both the registration and reregistration programs; by revoking tolerances for pesticides that have been canceled, by reevaluating pesticides with pre-FQPA REDs, and through other decisions not directly related to reregistration or registration.

More specifics on the Agency's progress in meeting its performance measures and goals for pesticide reregistration will be published in the Federal Register, as required by section 4(l) of FIFRA.

## **Other Considerations**

### **Use of Outside Reviewers**

During the course of FY2004, the Agency explored mechanisms for enhancing its work share efforts with Canada's Pest Management Regulatory Agency (PMRA) and the California Department of Pesticide Regulation (CDPR). Currently, there are 6 active ingredients being jointly evaluated by the EPA and PMRA as part of the Joint Review Program under the North American Free Trade Agreement. Through this process, EPA makes its own registration decision.

In further exploration of the use of outside reviewers, during fiscal year 2004, EPA worked with CDPR to expand their capacity to review residue chemistry studies and conduct dietary risk assessments in support of registration decisions. During FY2004, 11 crop combinations were reviewed through this joint effort. In addition, the two agencies collaboratively reviewed two new biopesticide active ingredients during FY2004.

In addition, during FY2004, the Agency detailed a senior manager to the Pesticides Section, Health and Consumer Protection Directorate, European Commission (EC) to build on the existing work sharing activities and lines of communication between EPA and the EC. Areas of focus included facilitating the exchange of risk assessments and advancing the sharing of workload between EPA and the EC to achieve more consistency in pesticide regulatory decisions for the registration and reregistration of pesticides, evaluation and registration of new active ingredients, guidelines on methodologies used in evaluations, and activities involving inert ingredients.

### **Performance-Based Contracts**

In March 2004, the Office of Pesticide Programs solicited proposals from other program offices within the Agency that might want enhanced funding to support the Agency's PRIA implementation efforts. The Office requested that other programs submit proposals describing the additional services that could be provided to assist in providing enhanced registration services, the resources necessary to provide these additional services, and a description of the performance measures that could be implemented to monitor the provision of these services.

In response, the Office of Pesticide Programs entered into a memorandum of understanding (MOU) with the Agency's Office of Acquisition Management (OAM) to award, modify, and initiate contract actions in support of PRIA. OAM agreed to negotiate accelerated performance agreements with contractors within 30 days; exercise additional quantities options with 48 hours of request, among other considerations, while maintaining the existing contract performance standards in place before PRIA passed. OAM agreed to submit bi-weekly monitoring reports to OPP. For provision of these enhanced services, the Agency allocated OAM one full-time equivalent (FTE) from resources supporting PRIA.

A second area under PRIA where the Agency has employed the use of performance-based contracts is in the area of processing and indexing support for studies and other technical documents submitted in support of registration decisions. Utilizing resources from the Pesticide Registration Fund, the Agency increased contract funding to lower the average study processing time from 20 days to 10 days. Through

a combination of hiring new staff and the learning curve for the new hires, it took a few months to meet the new turnaround time for all data. Since August 1, 2004, the contractor has consistently met the accelerated processing schedule for all new incoming data. From August 1, 2004 to January 28, 2005 the Agency received 2,110 studies subject to PRIA. The contractor was able to process these studies, on average, within 1.84 days. Through this effort, technical evaluators have more time to review the scientific information submitted in support of registration applications, ensuring a higher quality technical assessment.

## Appendix A: Decision Review Types for Actions Completed During FY2004

As required by Section 33(k) of PRIA, the following table provides the decision times for each application reviewed during Fiscal Year 2004. Note that negative decision times indicate that the Agency completed the action before it received payment or a waiver was granted. Completion of a registration action before payment is received typically occurs in situations where a voluntary fee payment has been offered for an application that was pending with the Agency prior to March 23, 2004 (the PRIA effective date). As EPA improves its reporting capabilities, the Agency reserves the right to update this completions table, as necessary.

### Key to the Table

M = New Active Ingredient application subject to the mandatory fee provisions

N = Application received on or after March 23, 2004

V = Voluntary payment request

PRIA Code	Type	Decision Number	Registration Number	PRIA Start Date	PRIA Due Date	Agency Completion Date	Decision Time (in days)
A53	N	341185	57787-30	5/3/2004	8/1/2004	7/7/2004	65
A53	N	341214	3008-88	4/16/2004	7/15/2004	6/30/2004	75
A53	N	342524	70404-8	5/13/2004	8/11/2004	7/7/2004	55
A53	N	343307	81343-1	8/2/2004	10/31/2004	9/29/2004	58
A53	N	343695	67420-2	8/23/2004	11/21/2004	8/31/2004	8
A53	N	344559	75340-4	6/24/2004	9/22/2004	8/10/2004	47
A53	N	346240	6836-322	8/24/2004	11/22/2004	9/1/2004	8
A54	N	341359	5383-118	4/20/2004	10/17/2004	6/30/2004	71
A54	N	343308	67619-11	6/2/2004	11/29/2004	9/3/2004	93
A57	N	341429	10324-25	4/21/2004	10/18/2004	9/9/2004	141
A57	N	342806	5813-54	5/25/2004	11/21/2004	8/26/2004	94
A57	N	342971	71654-7	5/26/2004	11/22/2004	8/10/2004	76
A57	N	343962	1258-841	6/11/2004	12/8/2004	9/9/2004	90
A57	N	344452	1258-1224	6/11/2004	12/8/2004	9/9/2004	90
B59	M	215459	73314-1	7/21/2004	11/13/2005	5/24/2004	-58
B59	V	340102	75624-1	6/1/2004	9/24/2005	5/28/2004	-4
B59	V	340103	75624-2	6/20/2004	10/13/2005	9/17/2004	90
B60	M	218667	74200-1	8/2/2004	7/28/2005	9/20/2004	49
B66	V	333929	69579-2	5/19/2004	8/17/2004	7/28/2004	70
B66	N	341434	75499-14	5/26/2004	8/24/2004	8/17/2004	84
B66	N	341710	69592-19	4/27/2004	7/26/2004	6/25/2004	59

<b>B67</b>	V	214368	2217-857	9/1/2004	2/28/2005	9/24/2004	23
<b>B68</b>	N	346377	2724-448	8/2/2004	1/29/2005	8/30/2004	28
<b>B69</b>	M	331295	75108-1	6/2/2004	11/29/2004	9/15/2004	105
<b>R01</b>	M	214531	264-808	7/8/2004	8/22/2007	6/30/2004	-8
<b>R01</b>	M	218937	400-512	9/2/2004	10/17/2007	9/10/2004	8
<b>R02</b>	M	211688	62719-499	6/17/2004	2/2/2007	9/27/2004	102
<b>R02</b>	M	219301	33657-10	8/16/2004	4/3/2007	9/17/2004	32
<b>R02</b>	V	220039	33657-17	8/16/2004	4/3/2007	9/17/2004	32
<b>R02</b>	V	340127	33657-16	8/16/2004	4/3/2007	9/23/2004	38
<b>R07</b>	M	211862	100-1175	6/15/2004	8/4/2006	8/5/2004	51
<b>R17</b>	V	329609	279-3279	6/3/2004	7/18/2007	9/30/2004	119
<b>R18</b>	N	341117	7501-173	4/13/2004	3/29/2007	8/18/2004	127
<b>R20</b>	V	328694	264-678	8/2/2004	7/18/2007	7/30/2004	-3
<b>R24</b>	V	211995	352-627	7/20/2004	9/8/2006	8/18/2004	30
<b>R24</b>	V	212007	59639-130	8/2/2004	9/21/2006	9/30/2004	58
<b>R26</b>	N	342803	6218-36	7/28/2004	7/18/2006	9/7/2004	42
<b>R30</b>	V	211791	66222-95	5/7/2004	8/5/2004	5/17/2004	10
<b>R30</b>	V	211971	66222-97	5/17/2004	8/15/2004	5/28/2004	12
<b>R30</b>	V	219059	66222-89	5/17/2004	8/15/2004	5/11/2004	-6
<b>R30</b>	V	330302	2749-521	7/27/2004	10/25/2004	8/23/2004	27
<b>R30</b>	N	340982	79676-1	4/13/2004	7/12/2004	7/9/2004	87
<b>R30</b>	N	340991	79676-2	4/13/2004	7/12/2004	7/9/2004	87
<b>R30</b>	N	341284	66222-103	4/19/2004	7/18/2004	7/15/2004	87
<b>R30</b>	N	341287	34704-854	4/19/2004	7/18/2004	5/4/2004	15
<b>R30</b>	N	341293	51036-429	4/19/2004	7/18/2004	5/21/2004	33
<b>R30</b>	N	341294	72155-64	6/2/2004	8/31/2004	8/18/2004	77
<b>R30</b>	N	341361	51036-430	4/20/2004	7/19/2004	5/21/2004	32
<b>R30</b>	N	341362	79676-3	4/20/2004	7/19/2004	7/16/2004	87
<b>R30</b>	N	341500	46075-5	4/20/2004	7/19/2004	7/6/2004	77
<b>R30</b>	V	341583	524-554	5/27/2004	8/25/2004	7/15/2004	48
<b>R30</b>	N	341706	1021-1813	6/15/2004	9/13/2004	7/12/2004	28
<b>R30</b>	N	341760	9688-218	5/17/2004	8/15/2004	5/19/2004	3
<b>R30</b>	V	341851	66330-54	6/9/2004	9/7/2004	8/10/2004	61
<b>R30</b>	N	341926	73049-414	5/3/2004	8/1/2004	6/3/2004	31
<b>R30</b>	N	342100	79676-4	5/6/2004	8/4/2004	6/30/2004	56
<b>R30</b>	N	342101	52287-17	5/6/2004	8/4/2004	6/21/2004	46
<b>R30</b>	N	342111	52287-18	5/3/2004	8/1/2004	6/21/2004	49
<b>R30</b>	N	342433	9198-222	5/17/2004	8/15/2004	8/9/2004	84
<b>R30</b>	N	342460	59913-12	5/13/2004	8/11/2004	8/5/2004	84
<b>R30</b>	N	342461	34704-857	5/10/2004	8/8/2004	5/18/2004	9
<b>R30</b>	N	342464	34704-858	5/10/2004	8/8/2004	6/28/2004	49
<b>R30</b>	N	342465	264-828	5/13/2004	8/11/2004	6/8/2004	26
<b>R30</b>	N	342466	264-827	5/13/2004	8/11/2004	7/7/2004	56
<b>R30</b>	N	342575	66222-105	5/17/2004	8/15/2004	6/30/2004	45

<b>R30</b>	N	342608	34704-856	5/12/2004	8/10/2004	8/6/2004	87
<b>R30</b>	N	342609	239-2690	5/14/2004	8/12/2004	8/5/2004	84
<b>R30</b>	N	342610	149-15	5/17/2004	8/15/2004	8/4/2004	80
<b>R30</b>	N	342611	34704-855	5/12/2004	8/10/2004	8/6/2004	87
<b>R30</b>	N	342612	239-2691	5/14/2004	8/12/2004	8/5/2004	84
<b>R30</b>	N	342701	46059-1	5/19/2004	8/17/2004	8/10/2004	84
<b>R30</b>	N	342858	34704-860	5/25/2004	8/23/2004	5/26/2004	2
<b>R30</b>	N	342860	34704-861	5/25/2004	8/23/2004	8/17/2004	85
<b>R30</b>	N	342861	34704-859	5/25/2004	8/23/2004	8/18/2004	86
<b>R30</b>	N	342862	42750-77	5/25/2004	8/23/2004	7/12/2004	48
<b>R30</b>	N	342964	9688-220	6/14/2004	9/12/2004	8/16/2004	63
<b>R30</b>	N	342965	9688-219	6/14/2004	9/12/2004	8/16/2004	63
<b>R30</b>	N	343094	34704-862	5/28/2004	8/26/2004	8/26/2004	91
<b>R30</b>	N	343095	34704-863	5/28/2004	8/26/2004	8/26/2004	91
<b>R30</b>	N	343125	71085-24	5/20/2004	8/18/2004	6/8/2004	19
<b>R30</b>	N	343129	71376-1	5/28/2004	8/26/2004	8/9/2004	73
<b>R30</b>	V	343259	52287-16	8/23/2004	11/21/2004	9/28/2004	35
<b>R30</b>	N	343262	51036-432	6/7/2004	9/5/2004	8/11/2004	65
<b>R30</b>	N	343263	33657-35	8/16/2004	11/14/2004	9/9/2004	25
<b>R30</b>	N	343264	33657-36	8/16/2004	11/14/2004	9/9/2004	25
<b>R30</b>	N	343371	33657-37	8/16/2004	11/14/2004	9/7/2004	23
<b>R30</b>	N	343372	33657-34	8/16/2004	11/14/2004	9/7/2004	23
<b>R30</b>	N	343462	74843-3	6/3/2004	9/1/2004	8/16/2004	74
<b>R30</b>	N	343536	869-245	6/8/2004	9/6/2004	7/27/2004	50
<b>R30</b>	N	343765	79676-7	6/10/2004	9/8/2004	7/23/2004	43
<b>R30</b>	N	343767	79676-6	6/10/2004	9/8/2004	7/21/2004	42
<b>R30</b>	N	343768	79676-5	6/10/2004	9/8/2004	7/20/2004	40
<b>R30</b>	N	343906	79676-9	6/15/2004	9/13/2004	7/26/2004	41
<b>R30</b>	N	343907	79676-10	6/15/2004	9/13/2004	7/26/2004	42
<b>R30</b>	N	343908	79676-8	6/15/2004	9/13/2004	8/10/2004	56
<b>R30</b>	N	343909	67572-82	9/7/2004	12/6/2004	9/30/2004	23
<b>R30</b>	N	343997	81198-1	6/17/2004	9/15/2004	8/6/2004	50
<b>R30</b>	N	343998	81198-2	6/17/2004	9/15/2004	8/6/2004	50
<b>R30</b>	N	344538	239-2692	6/30/2004	9/28/2004	9/21/2004	83
<b>R30</b>	N	344539	1381-189	6/23/2004	9/21/2004	8/6/2004	45
<b>R30</b>	N	344856	79676-11	6/28/2004	9/26/2004	7/6/2004	8
<b>R30</b>	N	344857	79676-12	6/28/2004	9/26/2004	9/10/2004	74
<b>R30</b>	N	344885	34704-864	6/30/2004	9/28/2004	9/17/2004	80
<b>R30</b>	N	345016	9688-221	7/5/2004	10/3/2004	7/29/2004	24
<b>R30</b>	N	345044	40849-77	7/21/2004	10/19/2004	9/14/2004	56
<b>R30</b>	N	345285	34704-865	7/9/2004	10/7/2004	8/25/2004	47
<b>R30</b>	N	345652	52287-19	7/20/2004	10/18/2004	8/17/2004	29
<b>R30</b>	N	345679	79676-13	7/15/2004	10/13/2004	8/25/2004	41
<b>R30</b>	N	346792	3862-175	9/13/2004	12/12/2004	9/21/2004	8

<b>R31</b>	V	211674	75395-1	6/7/2004	4/3/2005	6/23/2004	16
<b>R31</b>	V	211723	228-404	7/6/2004	5/2/2005	9/3/2004	59
<b>R31</b>	V	211781	44616-22	8/16/2004	6/12/2005	7/12/2004	-35
<b>R31</b>	V	211785	75395-2	6/7/2004	4/3/2005	6/23/2004	16
<b>R31</b>	V	211934	51036-427	7/12/2004	5/8/2005	8/3/2004	22
<b>R31</b>	V	212019	100-1177	6/8/2004	4/4/2005	8/13/2004	66
<b>R31</b>	V	214068	75240-1	5/13/2004	3/9/2005	6/2/2004	20
<b>R31</b>	V	214081	75240-6	5/13/2004	3/9/2005	6/15/2004	33
<b>R31</b>	V	214087	75240-4	5/12/2004	3/8/2005	6/15/2004	33
<b>R31</b>	V	214088	75240-5	5/13/2004	3/9/2005	6/15/2004	33
<b>R31</b>	V	214134	270-371	6/7/2004	4/3/2005	8/23/2004	77
<b>R31</b>	V	214401	270-373	6/7/2004	4/3/2005	8/23/2004	77
<b>R31</b>	V	215192	100-1170	5/4/2004	2/28/2005	9/29/2004	147
<b>R31</b>	V	218168	6297-7	6/4/2004	3/31/2005	6/25/2004	21
<b>R31</b>	V	218626	51036-387	7/6/2004	5/2/2005	6/30/2004	-6
<b>R31</b>	V	220210	62719-480	5/5/2004	3/1/2005	6/9/2004	35
<b>R31</b>	V	220229	62719-482	6/1/2004	3/28/2005	7/29/2004	59
<b>R31</b>	V	328887	33658-21	7/6/2004	5/2/2005	9/21/2004	77
<b>R31</b>	V	329754	40849-75	7/21/2004	5/17/2005	9/14/2004	55
<b>R31</b>	V	329761	40849-76	7/21/2004	5/17/2005	9/14/2004	55
<b>R31</b>	V	330143	121-87	5/27/2004	3/23/2005	6/16/2004	20
<b>R31</b>	V	330403	9688-211	5/27/2004	3/23/2005	6/18/2004	22
<b>R31</b>	V	331642	228-414	6/14/2004	4/10/2005	6/10/2004	-4
<b>R31</b>	V	332357	58190-3	6/14/2004	4/10/2005	9/2/2004	80
<b>R31</b>	V	332765	228-411	6/14/2004	4/10/2005	9/27/2004	105
<b>R31</b>	V	332795	72167-31	8/27/2004	6/23/2005	9/8/2004	12
<b>R31</b>	V	332821	9688-213	5/25/2004	3/21/2005	6/18/2004	24
<b>R31</b>	V	333337	100-1187	6/3/2004	3/30/2005	8/13/2004	70
<b>R31</b>	V	333513	100-1190	6/4/2004	3/31/2005	8/13/2004	69
<b>R31</b>	V	333552	228-416	6/14/2004	4/10/2005	9/8/2004	87
<b>R31</b>	V	333719	228-417	7/1/2004	4/27/2005	9/8/2004	69
<b>R31</b>	V	333924	79604-1	5/13/2004	3/9/2005	5/7/2004	-6
<b>R31</b>	V	334416	79604-2	5/13/2004	3/9/2005	5/19/2004	6
<b>R31</b>	V	334428	100-1191	6/3/2004	3/30/2005	6/24/2004	21
<b>R31</b>	V	334746	228-418	6/14/2004	4/10/2005	9/8/2004	87
<b>R31</b>	V	334847	100-1194	6/7/2004	4/3/2005	6/30/2004	22
<b>R31</b>	V	335761	100-1195	6/4/2004	3/31/2005	7/29/2004	54
<b>R31</b>	V	336254	59639-133	5/25/2004	3/21/2005	7/13/2004	49
<b>R31</b>	V	336363	432-1391	5/27/2004	3/23/2005	5/13/2004	-15
<b>R31</b>	V	336557	51036-428	7/12/2004	5/8/2005	8/5/2004	24
<b>R31</b>	V	338193	228-424	6/14/2004	4/10/2005	8/2/2004	50
<b>R31</b>	V	338227	79604-3	5/13/2004	3/9/2005	6/15/2004	33
<b>R31</b>	V	339559	62719-516	2/4/2005	12/1/2005	7/7/2004	-212
<b>R31</b>	V	340113	239-2689	6/4/2004	3/31/2005	9/3/2004	90

<b>R31</b>	V	340857	100-1201	5/4/2004	2/28/2005	7/1/2004	57
<b>R31</b>	N	340980	7501-209	4/13/2004	2/7/2005	4/22/2004	9
<b>R31</b>	N	340999	54287-RA	6/20/2004	4/16/2005	9/7/2004	79
<b>R31</b>	N	341211	71368-50	4/27/2004	2/21/2005	6/30/2004	65
<b>R31</b>	N	341212	264-823	4/16/2004	2/10/2005	6/29/2004	74
<b>R31</b>	N	341458	352-636	4/21/2004	2/15/2005	8/3/2004	105
<b>R31</b>	N	341711	432-1407	4/27/2004	2/21/2005	9/22/2004	148
<b>R31</b>	N	341924	2935-535	5/3/2004	2/27/2005	7/30/2004	88
<b>R31</b>	V	342343	228-428	7/8/2004	5/4/2005	8/25/2004	48
<b>R31</b>	N	342432	7969-225	5/17/2004	3/13/2005	9/17/2004	124
<b>R31</b>	N	344243	69526-9	6/25/2004	4/21/2005	8/10/2004	46
<b>R31</b>	N	347427	432-1416	9/1/2004	6/28/2005	9/22/2004	21
<b>R31</b>	V	211780	228-406	7/8/2004	5/4/2005	8/31/2004	54
<b>R31</b>	V	335172	228-419	7/8/2004	5/4/2005	9/8/2004	62
<b>R31</b>	V	343254	228-429	7/8/2004	5/4/2005	9/9/2004	63
<b>R31</b>	V	343255	228-430	7/8/2004	5/4/2005	8/13/2004	36
<b>R31</b>	V	343494	228-432	7/8/2004	5/4/2005	9/9/2004	63
<b>R31</b>	V	343517	228-431	7/8/2004	5/4/2005	9/9/2004	63
<b>R32</b>	V	218772	4691-167	9/1/2004	12/25/2005	9/10/2004	9
<b>R33</b>	V	211939	2217-863	8/4/2004	7/25/2006	8/13/2004	9
<b>R33</b>	V	214369	270-374	6/7/2004	5/28/2006	8/23/2004	77
<b>R33</b>	V	333751	2217-870	8/4/2004	7/25/2006	9/9/2004	36
<b>R34</b>	V	195962	100-895	5/5/2004	9/2/2004	8/19/2004	106
<b>R34</b>	V	335270	9688-193	5/25/2004	11/21/2004	4/9/2004	-46
<b>R34</b>	V	335478	66222-36	5/7/2004	11/3/2004	6/1/2004	25
<b>R34</b>	V	335830	432-1409	5/27/2004	11/23/2004	9/8/2004	104
<b>R34</b>	V	336272	264-777	5/12/2004	11/8/2004	5/7/2004	-6
<b>R34</b>	V	336963	55541-2	6/2/2004	11/29/2004	7/8/2004	36
<b>R34</b>	V	338391	66222-54	5/7/2004	11/3/2004	5/20/2004	14
<b>R34</b>	V	338625	100-999	5/12/2004	11/8/2004	9/10/2004	120
<b>R34</b>	V	339531	100-902	5/5/2004	11/1/2004	4/29/2004	-6
<b>R34</b>	N	341740	75066-2	5/25/2004	11/21/2004	9/21/2004	119
<b>R34</b>	V	341775	400-480	6/7/2004	12/4/2004	6/28/2004	21
<b>R34</b>	N	342054	432-1318	5/5/2004	11/1/2004	5/13/2004	9
<b>R34</b>	N	342059	432-1312	5/5/2004	11/1/2004	5/13/2004	9
<b>R34</b>	N	342399	1021-891	5/12/2004	11/8/2004	9/17/2004	128
<b>R34</b>	N	342618	70829-5	5/25/2004	11/21/2004	7/7/2004	44
<b>R34</b>	V	342762	400-175	6/7/2004	12/4/2004	7/8/2004	31
<b>R34</b>	N	343302	11678-18	6/9/2004	12/6/2004	8/2/2004	54
<b>R34</b>	N	343679	73342-1	6/10/2004	12/7/2004	7/21/2004	41
<b>R34</b>	N	343960	59639-41	6/16/2004	12/13/2004	9/3/2004	80
<b>R34</b>	N	344064	71995-33	6/18/2004	12/15/2004	9/16/2004	90
<b>R34</b>	N	344946	66222-85	6/29/2004	12/26/2004	7/13/2004	14
<b>R34</b>	N	345480	1021-1758	7/20/2004	1/16/2005	6/21/2004	-29

<b>R34</b>	N	345506	19713-329	11/22/2004	5/21/2005	9/27/2004	-57
<b>R34</b>	N	345602	100-1017	7/19/2004	1/15/2005	8/25/2004	37
<b>R34</b>	N	345943	59639-107	7/22/2004	1/18/2005	9/22/2004	63
<b>R34</b>	N	347424	73049-295	9/1/2004	2/28/2005	9/23/2004	22
<b>R34</b>	N	345944	59639-123	7/22/2004	1/18/2005	9/22/2004	63
<b>R34</b>	N	345945	59639-108	7/22/2004	1/18/2005	9/23/2004	64
<b>R34</b>	N	347160	72500-9	9/1/2004	2/28/2005	9/1/2004	0
<b>R35</b>	V	208310	352-597	5/13/2004	1/3/2006	6/1/2004	19
<b>R35</b>	V	336276	264-765	5/4/2004	12/25/2005	4/26/2004	-9
<b>R35</b>	V	340164	264-819	5/4/2004	12/25/2005	4/26/2004	-9
<b>R35</b>	V	342887	241-346	4/19/2004	12/10/2005	9/10/2004	145